Education and Training in Your Compliance and Ethics Program

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Agenda

- Introduction
- Evaluation of Corporate Compliance Programs - April 2019
- Risk-Based Training
- Form/Content/Effectiveness of Training
- Communications About Misconduct
- Availability of Guidance
- Conclusion
- Questions
Three Fundamental Questions

1. “Is the corporation's compliance program well designed?”

2. “Is the program being applied earnestly and in good faith?” In other words, is the program being implemented effectively?

3. “Does the corporation’s compliance program work” in practice?
Evaluation of Corporate Compliance Programs - April 2019

“Is the corporation’s compliance program well designed?”
- Risk Assessment
- Policies and Procedures
- Training and Communications
- Confidential Reporting Structure and Investigation Process
- Third Party Management
- Mergers and Acquisitions

Evaluation of Corporate Compliance Programs - April 2019

- Risk-based training
- Form/Content/Effectiveness of Training
- Communications about Misconduct
- Availability of Guidance
Risk-Based Training

- Risk assessment process drives training that is delivered
  - New hires
    - Right From The Start
    - TSM 101 and TSM 201
  - New Managers
    - You Lead The Way
  - Quarterly Process for all employees
    - Tailored to specific segments of the organization
    - Focused on risk areas unique to a sales force

Form/Content of Training

- Form/Content
  - In person
    - Lecture
    - Group Participation
    - Group Activities
  - Online
    - Video
    - eLearning
    - Knowledge Check
  - Other
    - Posters
    - C&I Playlist within the LMS
    - Previous training
    - Policy/Code Of Conduct
    - Fun/Engagement
Video Placeholder
“Do The Right Thing”

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Content Example - The Field

- Quarterly Training
  - Month 1 - Introduction
    - Read the policy and think about how it applies to your role
    - Commercial (**Play Commercial)
  - Month 2 - Deep Dive
    - Full Training - either through an eLearning or in person with your team
    - Full Episode (**Play Episode)
  - Month 3 - Knowledge Check
    - Interactive Quiz - taken individually
    - eLearning where characters from THE FIELD ask the questions
    - Must answer 8 of 10 questions correctly, or retake the training

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Quarterly Training

Month 1 - Introduction
- Read the policy and think about how it applies to your role
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Month 2 - Deep Dive
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Video Placeholder

“THE FIELD” - Full Episode
Content Example - The Field

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Content Example - New Employee Training

- TSM 101
  - In person, in conjunction with skills training
  - Examples
    - How does Kyle handle compliance opportunities?
- TSM 201
  - In person, in conjunction with skills training
  - Breathing Under Water
    - Film viewing (show trailer)
    - Review with experts from Law Department
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Video Placeholder
“Breathing Under Water”
Content Example - New Employee Training

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Effectiveness of Training

- Effectiveness
  - Completion
  - Knowledge Check
  - Practical Application/Supervisor Validation

![Bar Chart]

Training Gaps (abr: Compliance) - EMPTHY REPORT INDICATES NO GAPS

[Bar Chart Image]
Communications About Misconduct

- Share Key Performance Indicators (KPIs)
  - # of allegations
  - # of violations
  - # of separations
  - Policies that were violated that resulted in separations

Availability of Guidance

- Intranet site
- Policy Library
- Survey
  - Does my manager set a good example of ethical behavior?
  - Does our culture support reporting potential violations of the Code of Conduct, company policy, or the law?
  - Are reports of potential violations of the Code of Conduct, company policy or the law investigated and acted upon?
  - Do you ever feel pressured to compromise the Code of Conduct, company policy or the law?
Conclusion

- Make sure training is the right answer for the problem you are trying to solve
- Training should be engaging
- Be learner centric not topic centric
- Consider adding humor and gamification to training
- Consult with L&D, they will know how best to connect with your audience
- Understand your budget, and what you can do with it
  - Don’t be afraid to ask for more. The cost of a compliance failure is always more than the cost of prevention.

Questions?