Exploding Training Myths
How Marathon Oil, Phillips 66 and Other Organizations Build Affordable Compliance Training that Works

Steven Gyeszly
Chief Compliance Counsel
MarathonOil

Adriana Herrera
Vice President, Compliance and Ethics Officer

Dan Brown
Strategic Relationship Officer

Agenda for Today
WHAT TRAINING ISSUES DO YOU WANT TO ADDRESS IN TODAY’S SESSION?

SURVEY QUESTION
Which of the training issues below do you find most challenging?

- **WHY?** U.S. Govt. expectations
- **WHAT?** Content - Look & feel; substance
- **WHEN?** Amount and frequency of touch-points
- **WHO?** Targeting and capturing the appropriate audience
- **HOW?** More training, fewer resources

URL: https://www.surveymonkey.com/r/Feb12Q1
When it comes to U.S. Government expectations, my biggest challenge is:

- Understanding what these expectations are
- Relaying these expectations to senior management
- Embedding these expectations in our training program
- Documenting that we have met these expectations
- Maintaining a balance between compliance standards and business needs

URL:
https://www.surveymonkey.com/r/Feb12Q1

BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS

U.S. GOVERNMENT EXPECTATIONS
- U.S. Sentencing Guidelines
- Dept. of Justice Manual
- Dept. of Justice/Securities Exchange Commission FCPA Resource Guide
- Dept. of Justice “Evaluation of Corporate Compliance Programs”
- Enforcement Actions
**SURVEY QUESTION**

When it come to Content look & feel, and substance, my biggest challenge is:

- Finding a good content vendor partner
- The increased quality expectations of my leaders
- The balance between customization and standardization
- The need to do more than a 'one and done' annual course (i.e. behaviour change)
- Updates (and localization)

URL: https://www.surveymonkey.com/r/Feb12Q1

---

**BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS**

**WHAT?**

Content - Look & feel; substance

**LOOK & FEEL**

- Internal expectations vs. external requirements
- Going beyond traditional live or online training
- Out of the box = out of sight, out of mind

**SUBSTANCE**

- Quality over quantity
- Customize, customize, customize
- Update, update, update
SURVEY QUESTION

When it comes to the Amount and Frequency of touchpoints, my biggest challenge is:

- Building consensus on what they should be
- Integrating compliance into other areas such as culture and operations
- Touchpoints are reactive and not proactive
- Building support and buy-in at senior levels
- Time to launch: it takes too long to get from incident to targeted campaign response

URL:
https://www.surveymonkey.com/r/Feb12Q1

BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS

WHEN?
Amount and frequency of touchpoints

C

AMOUNT AND FREQUENCY OF TOUCHPOINTS

- “Too much is not enough”?
- Obtaining buy-in to ensure sufficient amount and frequency
- Compliance training as component of a broader campaign
- Strategies
When it come to Targeting and capturing the appropriate audience, my biggest challenge is:

- Defining and creating audience-specific content
- Reaching the audience (infrastructure, geography and delivery methods)
- Tracking, Reporting and Data-gathering
- Understanding the needs and access capabilities of a growing contractor and 3rd party audience
- Building support and buy-in at senior levels

URL: https://www.surveymonkey.com/r/Feb12Q1

---

**BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS**

**WHO?**
Targeting and capturing the appropriate audience

**TARGETING**
- Overlooked aspect of training
- Appropriate targeting can provide significant credibility
- Strategies

**CAPTURING**
- “Acceptable” completion rate
- Burden of responsibility in ensuring completions
- Strategies

**SPECIAL AUDIENCE CONSIDERATIONS**
- Board
- New employees
- Contractors
- Other third parties
SURVEY QUESTION

When it comes to delivering the same, or often even more training, while working with resource and budget freezes or cuts, my biggest challenge is:

- Time
- Identifying tech delivery strategies that bring savings
- Understanding / negotiating with the business on essential vs important
- Managing expectations: Compliance has gone mainstream, our budgets don’t reflect this
- Deciding if additional internal development resources or external OTS content give me a better RoI

URL:
https://www.surveymonkey.com/r/Feb12Q1

BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS

HOW?
More training, fewer resources

INTERNAL COST SAVINGS
- Build in savings during initial planning
- Willingness to take a risk
- Leveraging internal resources
- Strategies

EXTERNAL COST SAVINGS
- The Miracles had it right – “Shop Around”
- New technologies
- Outsourcing
- Strategies

WHERE NOT TO SKIMP
- Translation
- Completion efforts
- Strategies
WHAT HAVE WE LEARNED?

SURVEY WRAP UP QUESTIONS

URL: https://www.surveymonkey.com/r/Feb12Q1
SURVEY WRAP UP QUESTIONS

How would you describe your compliance training strategy?

- Consistent, articulated, measurable
- Confused and inconsistent
- What strategy?
- Meh. Select key elements are in place, but we have a way to

URL:
https://www.surveymonkey.com/r/Feb12Q1

SURVEY WRAP UP QUESTIONS

How is compliance training perceived in your organization?

- A necessary evil
- A useful reminder of the rules and expectations
- A great way to boost our compliance culture
- Not taken seriously

URL:
https://www.surveymonkey.com/r/Feb12Q1
You know your compliance training program is effective because...

A. We measure carefully and gather hard data
B. We have anecdotal evidence but no hard data
C. Actually, we don’t know if our program is effective
D. Ha! It is hard enough to just deliver the training

URL:
https://www.surveymonkey.com/r/Feb12Q1

We have a strong culture of compliance in our organization:

A. Strongly Agree
B. Agree
C. Disagree
D. Strongly Disagree

URL:
https://www.surveymonkey.com/r/Feb12Q1
Thank You!

Adriana Herrera
Senior Global Compliance Analyst at Phillips 66. In her role, she is responsible for various facets of the compliance program. She previously held positions at Weatherford International and Reliant Energy. Adriana received a Bachelor's Degree from LeTourneau University and her paralegal certification from The Center for Advanced Legal Studies. She has been in the Compliance industry since 2000 and received her CCEP in 2005.

Steven Gyeszly
Chief Compliance Counsel for Marathon Oil, a global energy exploration and production company. In this role, Steven develops and leads a pragmatic compliance program with initiatives that are deployed across the entity. Prior to joining Marathon Oil, Steven served in escalating compliance leadership roles at a global oilfield services provider where he helped build a global compliance framework from the ground up while simultaneously responding to multiple government investigations. Before moving in-house, Steven worked at an international law firm where he focused on advising and defending clients in government investigations and commercial litigation.

Dan Brown
Moderator

Vice President, Compliance and Ethics Officer

Strategic Relationship Officer

Dan has an extensive background in e-learning, blended learning, classroom education and learning design for adult audiences. He oversees the learning strategy for partnerships with large, global companies that have delivered business savings and returns in excess of $500 million. In his spare time he wishes he had enough patience to meditate.

Steven has an extensive background in e-learning, blended learning, classroom education and learning design for adult audiences.

In his spare time he wishes he had enough patience to meditate.