

# Identifying and Managing Top International Risks for Global Compliance & Ethics Programs



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**United Parcel Service**  
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# Identifying and Managing Top International Risks

## UPS History

- Began in 1907
- 409,537 employees globally
  - 342,652 domestic U.S.
  - 66,885 international
- Enables global commerce
- Leading provider of global transportation and logistic services
- More than 200 countries and territories worldwide
- Airports Served
  - 400 domestic U.S. – 1,701 flights daily
  - 377 international – 767 flights daily
- International air hubs in Europe, Asia Pacific, Latin America, Caribbean, and Canada



# Identifying and Managing Top International Risks

## UPS Acquisitions

- 2004 Menlo Forwarding – Now Cartage Services & SCS
  - increased international air freight capabilities
- 2004 Sinotrans
  - gained direct control of international express operations in Asia
- 2005 Stolica
  - strengthened domestic network in Poland
- 2005 Lynx
  - strengthened package deliveries in U.K.

# Identifying and Managing Top International Risks

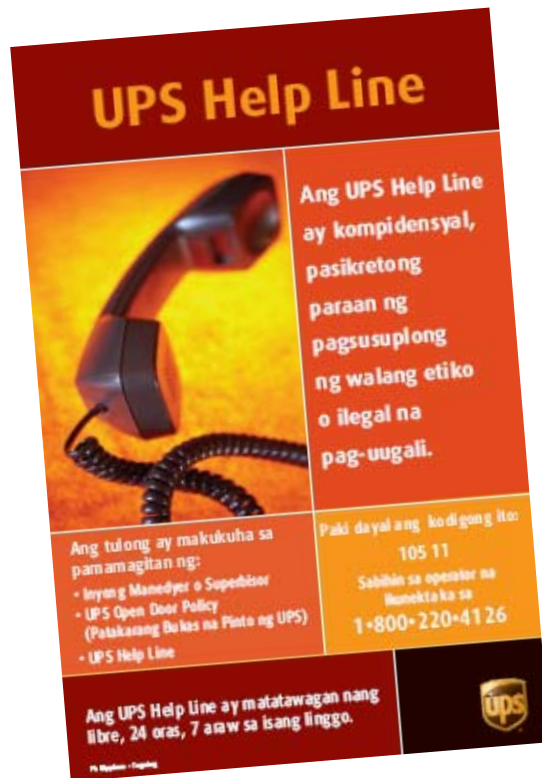
## Components of UPS Compliance Program



- Code of Business Conduct
  - available in 12 languages
- Compliance and Ethics Training
  - Antitrust
  - Anti-Corruption
  - Information Use and Security Compliance
  - Insider Trading Compliance
  - Government Contracts

# Identifying and Managing Top International Risks

## Components of UPS Compliance Program



**UPS Help Line**


Ang UPS Help Line ay kompidensyal, pasikretong paraan ng pagsusuplong ng walang etiko o ilegal na pag-uugali.

Ang tulong ay makukuha sa pamamagitan ng:

- Inyong Manedyer o Supervisor
- UPS Open Door Policy (Patakaran ng Buksang Pinta ng UPS)
- UPS Help Line

Paki dayal ang kodigong ito:  
105 11  
Sabihin sa operator na  
Ibuneta ka sa  
1-800-220-4126

Ang UPS Help Line ay matatwagan nang libre, 24 oras, 7 araw sa isang linggo.



- Business Ethics Questionnaire
- Report and Certification Program
- UPS Help Line
  - CNIL in Europe
- Records Management
- Regulatory Compliance Review



**UPS Help Line**  
1-800-220-4126

The UPS Help Line is a confidential, anonymous way to report unethical or illegal behavior.

Help is available through:

- Your manager or supervisor
- The UPS Open Door Policy
- The UPS Help Line  
1-800-220-4126

The UPS Help Line is available toll-free, 24 hours, 7 days.

1-800-220-4126




UPS Help Line - Microsoft Internet Explorer provided by UPS

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Address [http://compliance.inside.ups.com/compliance/content/b\\_upshelpcodes.htm](http://compliance.inside.ups.com/compliance/content/b_upshelpcodes.htm) Links »

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 **business conduct & compliance program** [UPS Help Line]

**Work with your manager.**

- [Anti-Corruption Manual](#)
- [Anti-Harassment Policy](#)
- [Antitrust Guidelines](#)
- [Bus. Ethics Questionnaire](#)
- [Code of Business Conduct](#)
- [Communications](#)
- [Department Directory](#)
- [Gifts & Gratuities](#)
- [Government Contracts](#)
- [HAZMAT Topics](#)
- [Info Use & Security](#)
- [Insider Trading Compliance](#)
- [Motor Carrier Compliance](#)
- [Political Activities Compliance](#)
- [Records Management](#)
- [Report & Certification](#)
- [Standards & Procedures](#)
- [Training Programs](#)
- [Trans of Alcoholic Beverages](#)
- [Trans of Tobacco](#)
- [UPS Help Line](#)
- [UPS Store Ownership](#)
- [UPS Sustainability Report](#)

**UPS Help Line  
Country Access Codes**

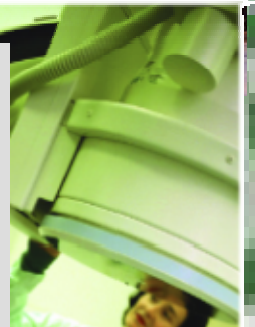
Country	Access Code
Argentina	0 800 55 54 288
Australia	1 800 881 011
Austria	0800 200 288
Bahrain	800 00 001
Bangladesh	157 0011
Belgium	0 800 100 10
Belarus	8 800101
Bolivia	800 10 1110
Brazil	0 800 8888 288
Canada	1 800 220 4126 (direct call)
Chile	800 225 288
China	108 888
Colombia	01 800 911 0010
Costa Rica	0 800 0 114 114
Czech Republic	00 800-222-55288
Denmark	8001 0010
Dominican Republic	1 800 872 2881

Done Local intranet



DEA

# GLOBAL



Federal Sentencing Guidelines

# Identifying and Managing Top International Risks

## Reducing Risk



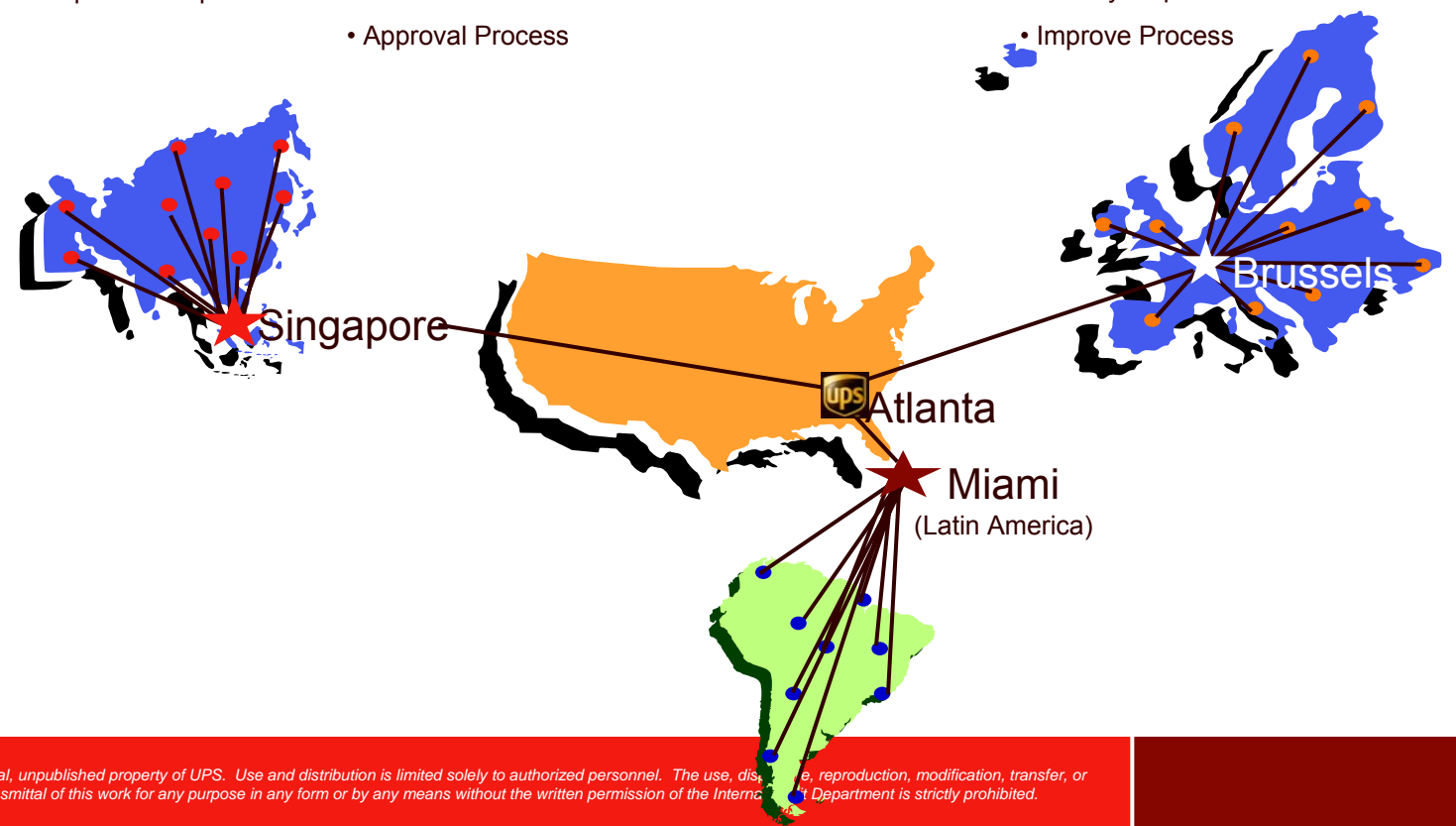
- Regulations
- Process Owner
- Existing Procedures
- Compliance Gaps

- Compliance Program
- Procedures
- Manuals / Reports
- Audit Tools
- Approval Process

- Schedules
- Training Materials
- Web Postings
- PCMs

- Perform Training
- Track Progress
- Check Validity
- Identify Gaps
- Improve Process

- Self Audit
- Region / Corporate Oversight
- Corrective Action Process





# Identifying and Managing Top International Risks

## Focus Areas of International Regulatory Compliance

### Six Focus Areas of the International Regulatory Compliance Assessment

- Health and Safety
- Environmental
- Dangerous Goods
- Records Management
- Data Protection/Privacy
- Motor Carrier Compliance

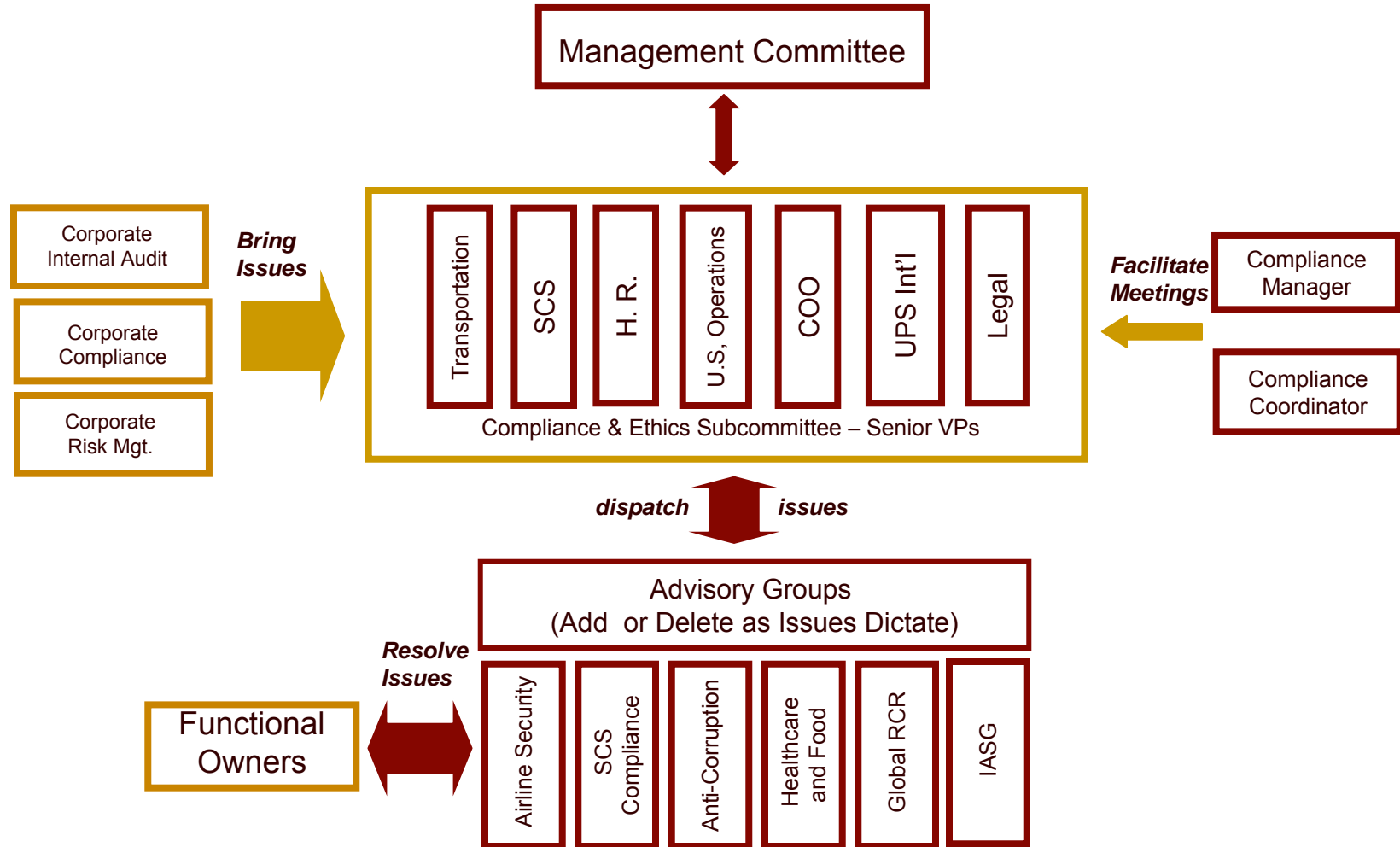


# Identifying and Managing Top International Risks Compliance and Ethics Department

Steve Donovan VP Compliance and Ethics															
Anna Svard Thompson				Tom Murphy							Bob Gordon				
Global Ethics Manager				Compliance Manager U.S. Domestic Small Package and SCS; UPSCO; UPS Freight							Compliance Manager International				
Group Manager				Alex Burgess		Peter Harris		Chris Summerrow			Mark Wixsom	Jeff Nutter	Scott McKittrick	Li Min Chong	Achim Schaezel
Area of Responsibility	Global Ethics	Learning & Development	UPS Help Line	Economic & Financial	Employee	Transportation Ground Air Ocean		Integration	Environmental	Product	Special Assignment Anti-Corruption	Regulatory Monitor (RCR)	Americas	Asia	Europe
Manager	Blake		Davis	Swift	Bunch	Kirk			Fernandez			Scardina			
Supervisor	Ward			Hawkins						Collins		Snider			
Admin				Garrison											
Representative Programs (not inclusive)	Code of Conduct CSR BEQ Report & Certification Messaging External Affairs	Strategies Content Mgt. Tools		IASG Banking Anti-Trust Anti-Corruption Insider Trading Privacy Records Mgt	Safety ADA HIPAA Fair Employment Practices	Licensing Security Brokerage Customs Abandoned Freight	Acquisitions Gap Analysis Risk Mgt Implementation	Fuel Systems Storm Water Waste Water Spills Haz Waste Remediation	Regulated Goods Pharma Healthcare Food	Program Development Tiered Country Deployment	U.S. Package U.S. SCS Int'l Package Int'l SCS		Small Package SCS Implementation and Monitoring	Small Package SCS Implementation and Monitoring	Small Package SCS Implementation and Monitoring
UPSCO	TBD			Denny Stephens											
UPS Freight	TBD			Phil Warren											
CSI	TBD			Bob Pannell											
SCS	TBD			Fred Lamb								Mike Peacock			

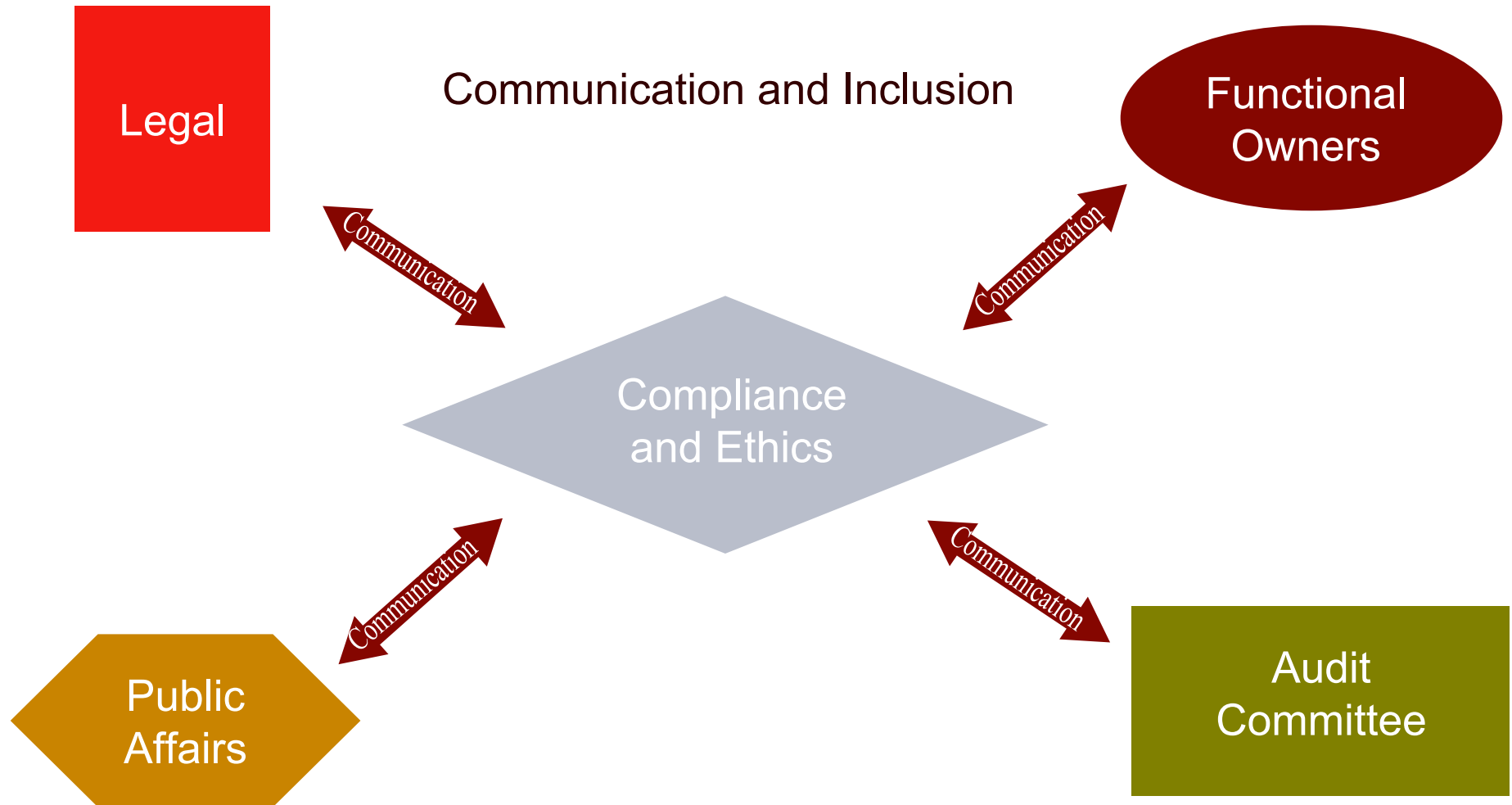
# Identifying and Managing Top International Risks

## Corporate Compliance Committee



# Identifying and Managing Top International Risks

## Importance of Communication and Inclusion



# Identifying and Managing Top International Risks

## Take-A-Ways

- Know your process
- Executive oversight
- Keep tools global – Not U.S. deployed globally
- If you stop “improving” . . . you might be “behind”

# Identifying and Managing Top International Risks

## Questions?

Thank you      Gracias      Danke      **Merci**  
Teri ma kasi h      *Xie-xie*      Dankie      Tack  
Dank u      Domo arigatou  
*Obrigado*      Grazi      Dankon  
Shukran      Hvala Vam  
Mange takk      Agui j e  
Tak      ***Maraming Salamat***