

RIGHTSIZING COMPLIANCE PROGRAMS

Presented by: Miranda Strong & Renee Wardlaw

1

Presenters

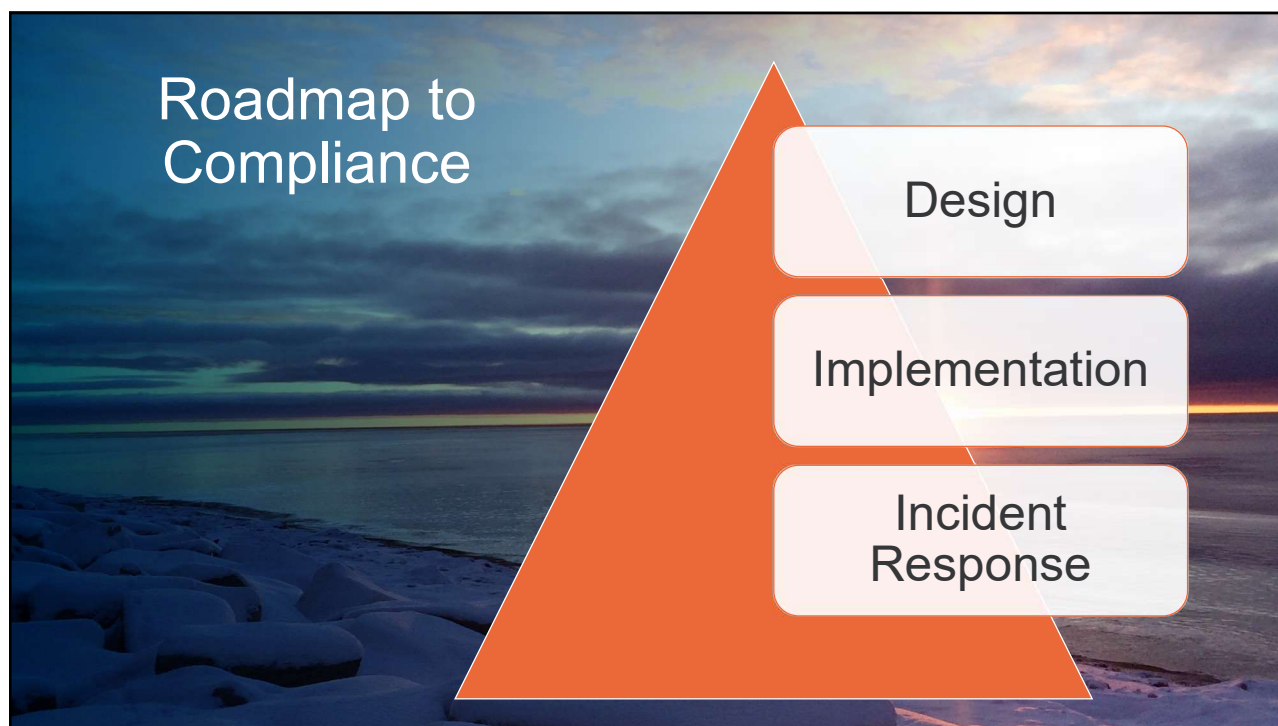


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2



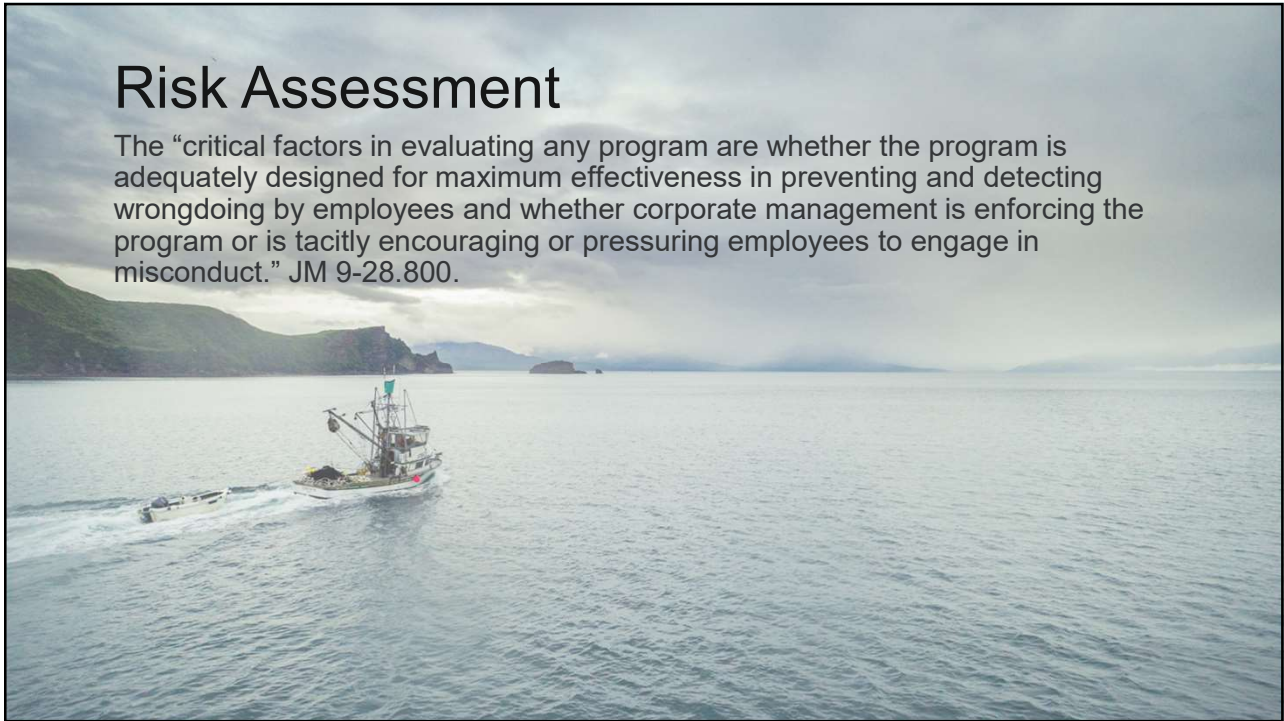
3



4

Risk Assessment

The “critical factors in evaluating any program are whether the program is adequately designed for maximum effectiveness in preventing and detecting wrongdoing by employees and whether corporate management is enforcing the program or is tacitly encouraging or pressuring employees to engage in misconduct.” JM 9-28.800.



5

Risk Assessment

3 I's

- Informed by stakeholders
- Identify gaps
- Initiatives & program priorities



6

Policies & Procedures

The Compliance Department is responsible for the maintenance of written standards – policies, procedures, guidelines

- See U.S. Federal Sentencing Guidelines §8B2.1(b)(1)

7

Policies & Procedures

- Storage
- Standard
- Schedule



8

Training & Communication



9

Training & Communications

- Owner
- Method of Delivery (LMS)
- Content
 - ✓ Required
 - ✓ Optional



10

Keep it Fresh

- Monthly Newsletter
- Anecdotal Stories



11

Reports

- Helpline
- Anonymous
- Ethical Advocate, Navex, etc.
- Anti-retaliation



12

Third-Party Management

- Incorporated in vendor management, procurement
- Controls
- Training
- Compensation/incentives
- Track red flags
- Common problems in FCPA



13

Mergers & Acquisitions

- Compliance needs seat at the table
- Due diligence
- Embedded before and after M&A




14



15

Committed Leadership

- Servant leadership
- Support and empower
- Stand behind principles



16

Annual Leadership & Compliance Conference

- Theme
 - ✓Next Level Leadership: Soaring to New Heights
- Breakout Sessions
 - ✓Tailored to the needs of the specific subsidiary audience
- Servant Leadership
- Fireside Chat with the Executive Team
- Recognition Dinner with Awards



17

Autonomy & Resources



18

Autonomy & Resources

Relationships with other departments



19

A Resource for Subsidiaries

- Compliance Leads
- A conduit to each subsidiary



20

Incentives & Discipline



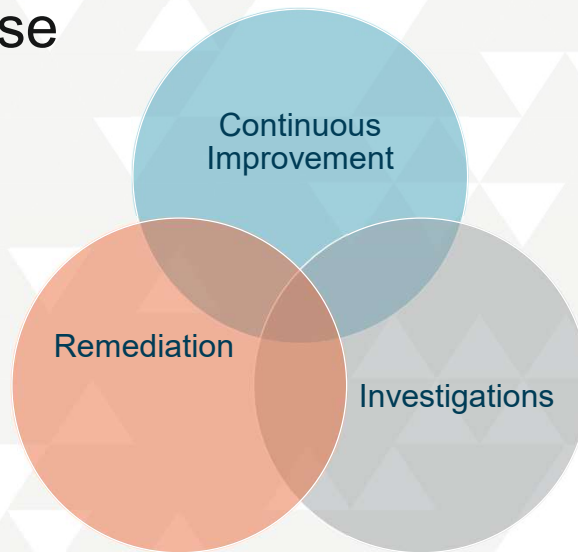
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Incentives & Discipline

- FY 20 Incentives
 - ✓ High Character Leadership Award given at the Leadership & Compliance Conference
 - ✓ Weekly prizes for timely completion of training
- FY 20 Discipline
 - ✓ Internal Investigations in conjunction with appropriate subsidiary personnel
 - ✓ Work with Human Resources, Legal and Management, if applicable, to resolve unethical behavior quickly

22

Incident Response



23

Investigations

- When
- Who
- Scope
- Ensure independence, objectivity, appropriate, and well-documented
- Funded appropriately
- Timely



24

Respond, Remediate & Assess

- Root cause
- Vulnerabilities
- Accountability lapses
- Appropriate, timely discipline
- Prior indications
- Monitor and document
- Use results as metrics



25

Continuous Improvement

- The Compliance Department is dedicated to continuous improvement in all areas of compliance so that compliance can support the strategic plan for BBNC today and in the future
 - ✓ See U.S. Federal Sentencing Guidelines §8B2.1(c)



26

Thank You!

