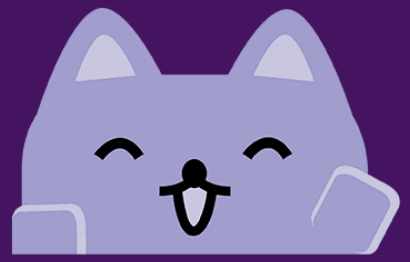
The Atlanta Compliance & Ethics Roundtable's 16th Annual Best Practices Workshop

October 20, 2023

GTRI Conference Center

Atlanta, GA

GET OUT OF YOUR LMS AND INTO YOUR ORG



BROADCAT

Hi, there!

About us

Jaycee

Director of
Customer Success

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Director of
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Get out of your LMS and into your ORG

You know the risk.

How do you change behavior?

think strategically about comms to drive training

measure behavior changes; not completion rates

review examples and start a roadmap

Training & Communication Planning

1. Pick your highest risks
2. Decide how to address them
3. Select who you need to message
4. Focus on tasks, behaviors, and timing
5. Keep it short to make it stick!
6. Pick familiar comm tools to do it
7. Measure success with metrics that matter

Pick your highest risks

1

Risk assessment

Look at hotline call data and volume

Culture Survey data

Confirm local laws/regs/policies

Audit findings

What are you hearing?

Decide how to address risks

2

Not every problem requires training.

Ask yourself:

- Can this be addressed with internal controls?
- Can business processes be created/improved?
- Does the policy need to be simplified?
- Are there legal training requirements?
- Can I simply use reminders and other comms?

Select who you need to message

3

What specific behaviors do we need to influence?

Which people do the thing that creates or mitigates risk?

Focus on tasks, behaviors, and timing 4

Focus on tasks

Stop focusing on risks. Start systematically training people on what they actually do.

Show it when they need it

Make it available when employees are about to do something risky—not just according to a schedule.

Monitor your processes

Integrate it into your business processes, your workflows, and the other parts of your compliance program.

Keep it short to make it stick!

Repetition

Elaboration

Associations

Multiple modes

Short sessions

Pick familiar comm tools to do it

5

Email

Text/chat

Collaborate on tools

Morning team huddles

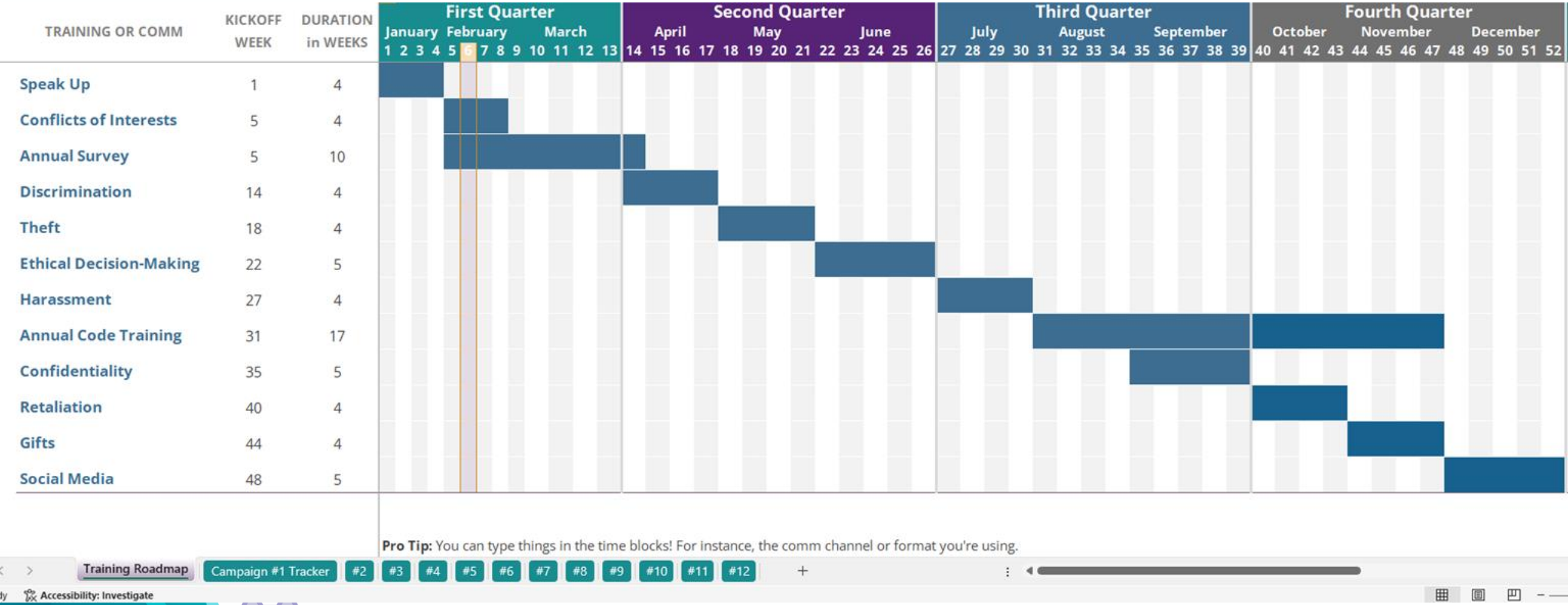
Routine all-staff meetings

Web portals

Apps

Here’s what it looks like

Birds-eye view



Conflicts of Interests

Broadcat Tool	Tokens	Format	Delivery Method	Audience	Complete
What tools are you using?	*# of tokens*	*Select format*	*How are you getting this tool to your employees?*	*Which groups of employees will receive this?*	*Mark when deployed*
If it's disclosed, it can be managed	8	Job Aid	Manager-led discussion	All managers; Sales; BizDev; Finance; Procurement; Gov Relations	☐
Conflicts - Do any of these apply to you?	8	Video	Annual disclosure notice email	All managers; Sales; BizDev; Finance; Procurement; Gov Relations	☐
COI email signature reminders	2	Awareness Piece	Leader email signatures	Email recipients	☐
What happens when I make a disclosure?	8	Job Aid	Disclosure portal; Code; Resource Library	All employees	☐
Assessing Conflicts of Interest	8	Job Aid	Meeting handout	HR; Interest review committee	☐
Conflicts - Plain and simple	12	Mini Module	LMS	All employees	☐
How to manage conflicts of interest	7	Mini Module	LMS	Managers	☐

Notes:
Topic also covered in New Hire Training

Training Roadmap | Speak-up Campaign #1 | COI Campaign #2 | #3 | #4 | #5 | #6 | #7 | #8 | #9 | #10 | #11 | #12

Measure success with metrics that matter 7

	Measure Effectiveness Based on Behavior Change			
Title	Success Indicators	Baseline	Results	Assessment
What's the name of this training?	How will you measure effectiveness?	What are the metrics before training is delivered?	How did the baseline metrics change?	Was your training effective?
What's Acceptable? Gifts and Entertainment Guide	Fewer unallowable gifts submitted for reimbursement and/or disclosed in gift portal.	12 unallowable gifts given last year	7 unallowable gifts given at year end	Yes! We'll also send out a reminder before the holidays and the sales director will speak directly to team members who gave unallowable gifts.

OK! Now, let’s practice…

Time to ideate and interact!

Think about one high risk you have:

- What behaviors do I need to encourage?
- Who needs to be encouraged to behave like this?
- What are the ways I can encourage them (controls, training, communications, resource enhancements, etc.)?
- How should these be delivered? And when?
- How can I leverage the communication tools this audience likes to use?
- What metrics will tell me this worked?

TIP! Focus on utility. Put yourself in the recipient's shoes and build from there.

Planning Your Comms Strategy

What behaviors do I need to encourage?

Who needs to be encouraged to behave like this?

What are the ways I can encourage them (controls, training, communications, resource enhancements, etc.)?

How should these be delivered? And when?

How can I leverage the communication tools this audience likes to use?

What metrics will tell me this worked?

What have we learned?

Key Takeaways

Do you know what risks you need/want/should focus on, and how?

Have you explored all the ways to connect with your colleagues?

Remember:

Don’t forget the human experience!

Your comms should help your employees feel empowered to reach out!

BROADCAT

Get out of your LMS and into your ORG

Thanks for welcoming us today!

Questions?

Visit thebroadcat.com

Send us an email

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EVOLVING GLOBAL DUE DILIGENCE LEGISLATION

Panelists

Sam Parker

Senior Manager, Sales Engineering, OneTrust

D’Ree Cooper

Vice President, Global Employment & Global Compliance & Ethics, Travelport

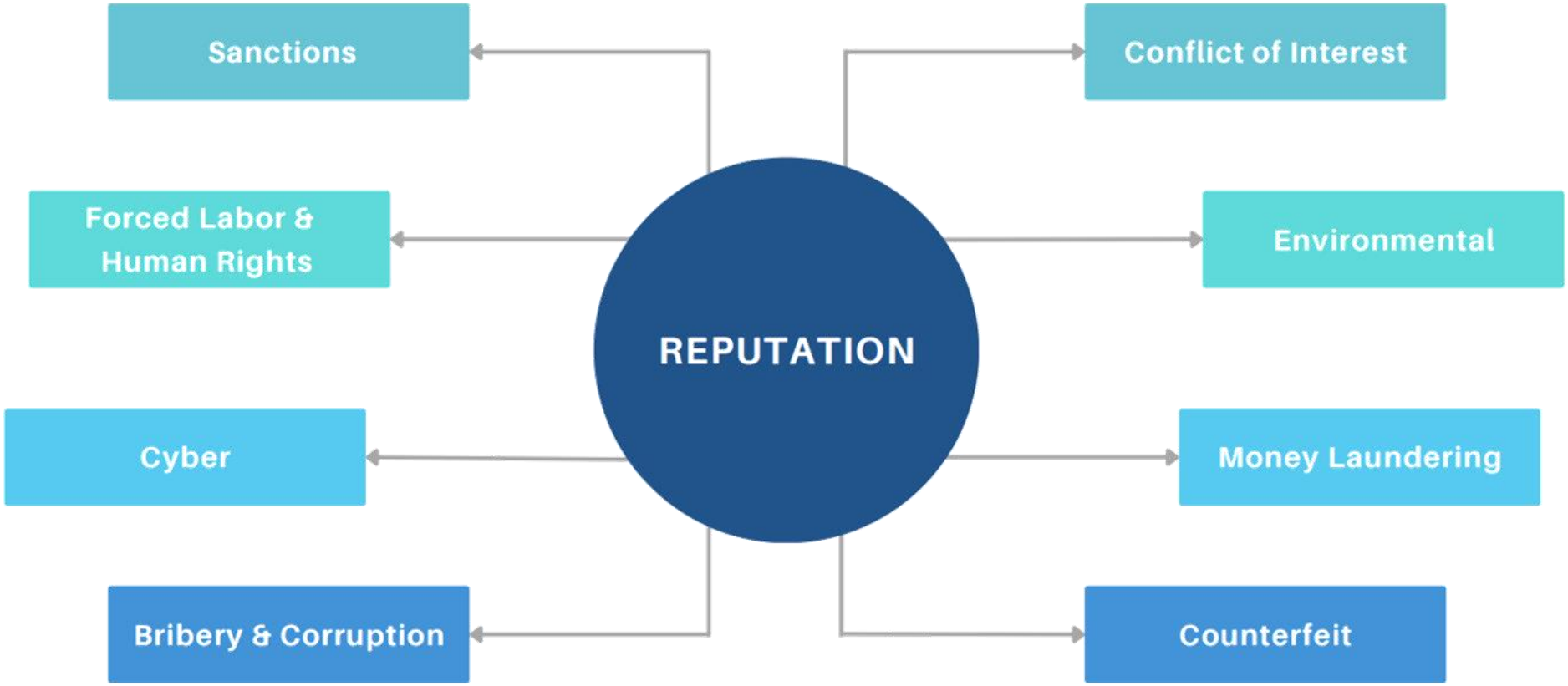
Adria Perez

Partner, Kilpatrick Townsend

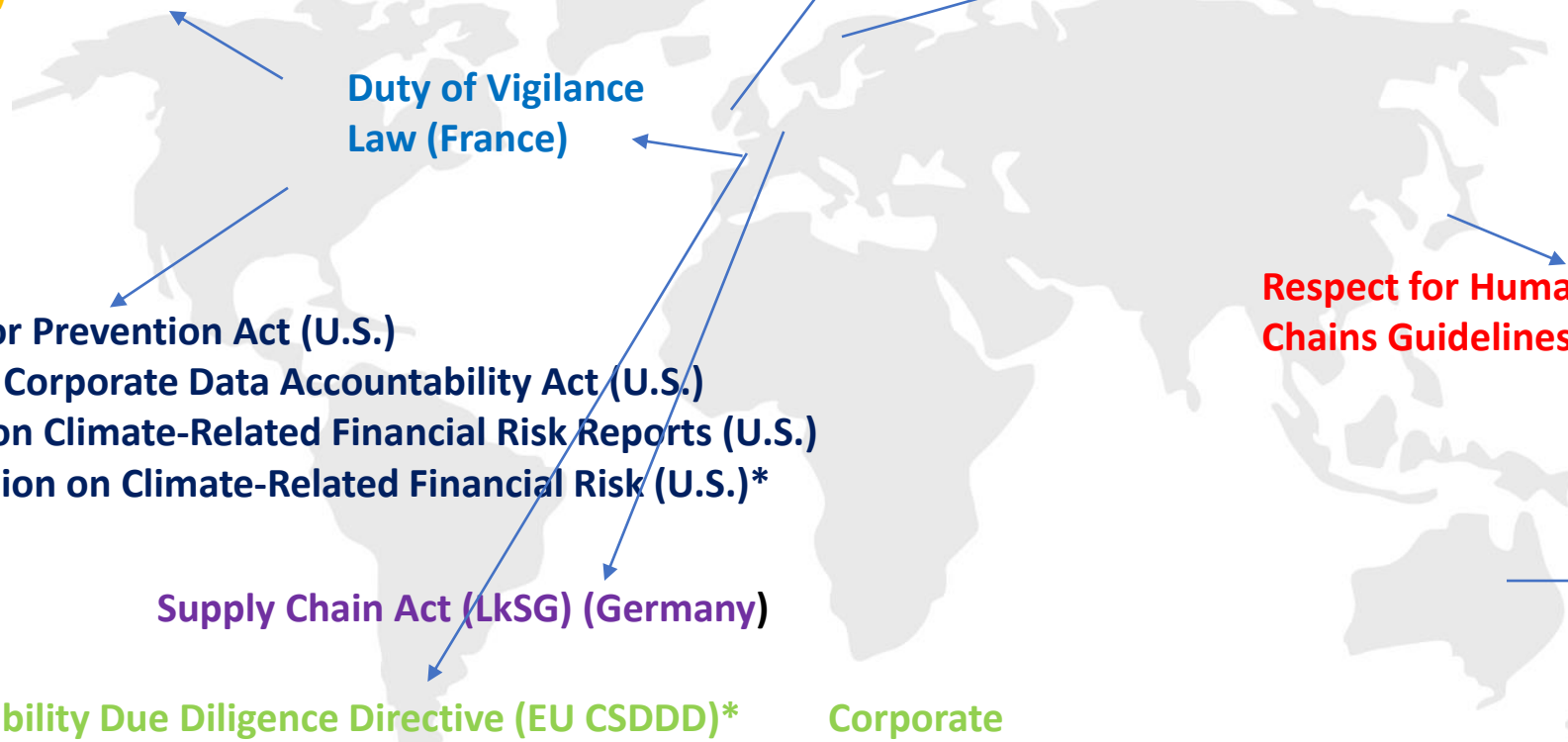
A Few Things to Note

- “Suppliers” is a broad term.
- Do not forget about “flow down” supplier requirements.
- Besides the supply chain laws, enforcement authorities issue guidance that stresses the importance of due diligence, such as the U.S. Department of Justice’s Evaluation of Corporate Compliance Programs.

Potential Supply Chain Risks



Examples of Supply Chain Laws



Swiss Code of Obligation

Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)

Modern Slavery Act (UK)

Duty of Vigilance Law (France)

Uyghur Forced Labor Prevention Act (U.S.)
California's Climate Corporate Data Accountability Act (U.S.)
California's SB 261 on Climate-Related Financial Risk Reports (U.S.)
Proposed FAR Revision on Climate-Related Financial Risk (U.S.)*

Respect for Human Rights in Responsible Supply Chains Guidelines (Japan)*

Modern Slavery Act (Australia)

Supply Chain Act (LkSG) (Germany)

Corporate Sustainability Due Diligence Directive (EU CSDDD)*

Corporate Sustainability Reporting Directive (EU CSRD)

Best Practices

Inherent Risk Calculation

Collect Baseline Data to Calculate Inherent Risk and Inform the Depth of Screening

Screening & Triage

Screen Third Parties for Red Flags Relating to Corruption, Ethics, Compliance and ESG

Risk-Based Assessment

If Needed, Conduct an Assessment Based on Screening Results and Identified Risks

Enhanced Due Diligence

If Needed, Conduct Enhanced Due Diligence for Riskiest Third Parties

Ongoing Monitoring

Activate Ongoing Screening to Monitor Third Parties for New Risks as They Arise

Company vs. Supplier Compliance with These Laws

Company

- Code of Conduct/Supplier Code of Conduct
- Third-Party Due Diligence Procedures
- Contractual Obligations & Certifications
- Compliance KPIs that are Part of Supplier Performance Management
- Third-Party Objective Certifications
- Monitoring Procedures for High-Risk Suppliers
- Process to Gather, Test & Report Data from Suppliers

Supplier

- Policies and Procedures that Comply with the Applicable Due Diligence Laws
- Process to Gather, Test and Report Data to Customers/Clients
- Third-Party Due Diligence Procedures for Sub-Suppliers
- Contractual Obligations & Certifications with Sub-Suppliers
- Participate In and Require Third-Party Certifications for Sub-Suppliers
- Monitoring Procedures for High-Risk Sub-Suppliers

Five Key Steps

1. Determine which laws apply to your company and when
2. Conduct a gap analysis (even if it is basic)
3. Conduct a risk assessment (even if it is basic) to determine which high-risk suppliers (or sub-suppliers) are the priority
4. Establish a communication channel between the legal, compliance, risk, procurement and sales departments concerning suppliers
5. Determine which due diligence mechanisms you need to use or enhance

AI READY FOR LAUNCH: LEVERAGE INNOVATION. SAFEGUARD INFORMATION.

Introducing…

BRENNAN STEWART

Introducing…

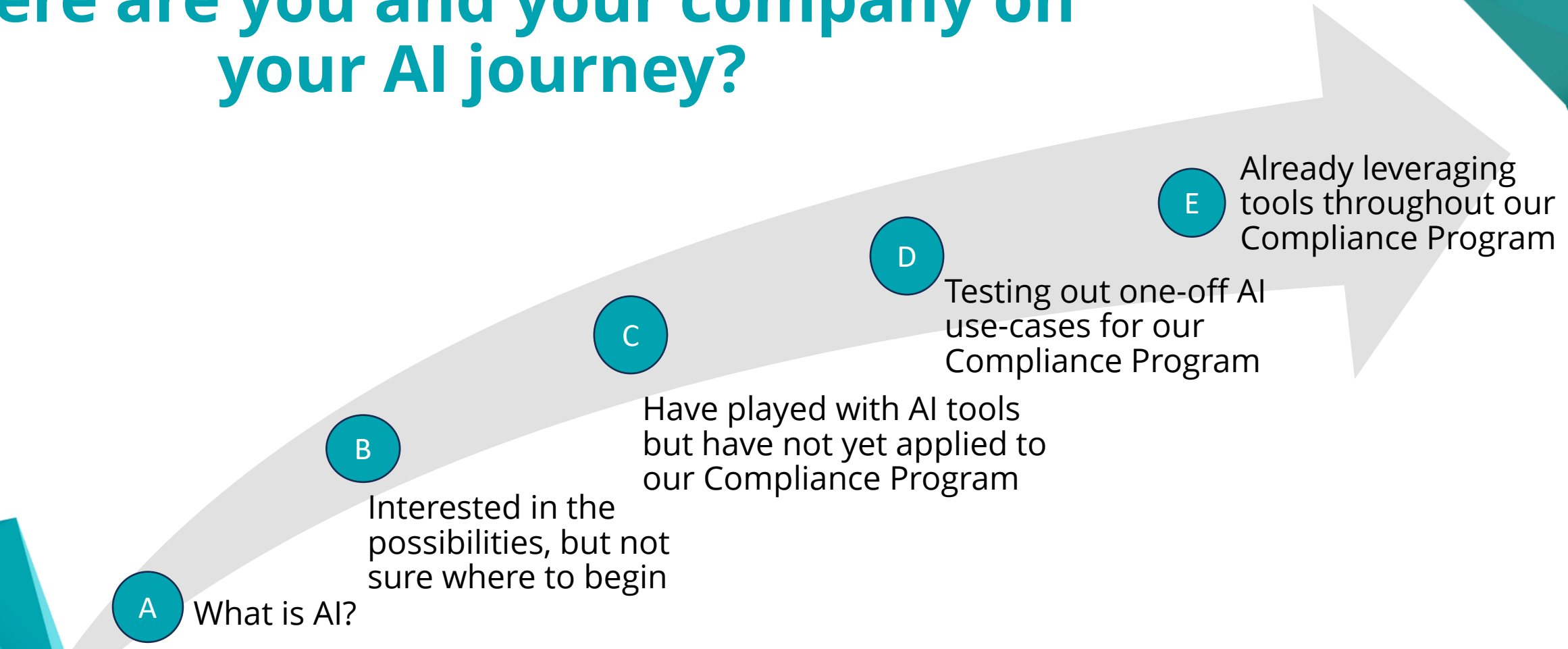
TODD SWINT

Introducing…

KEVIN YOUNG

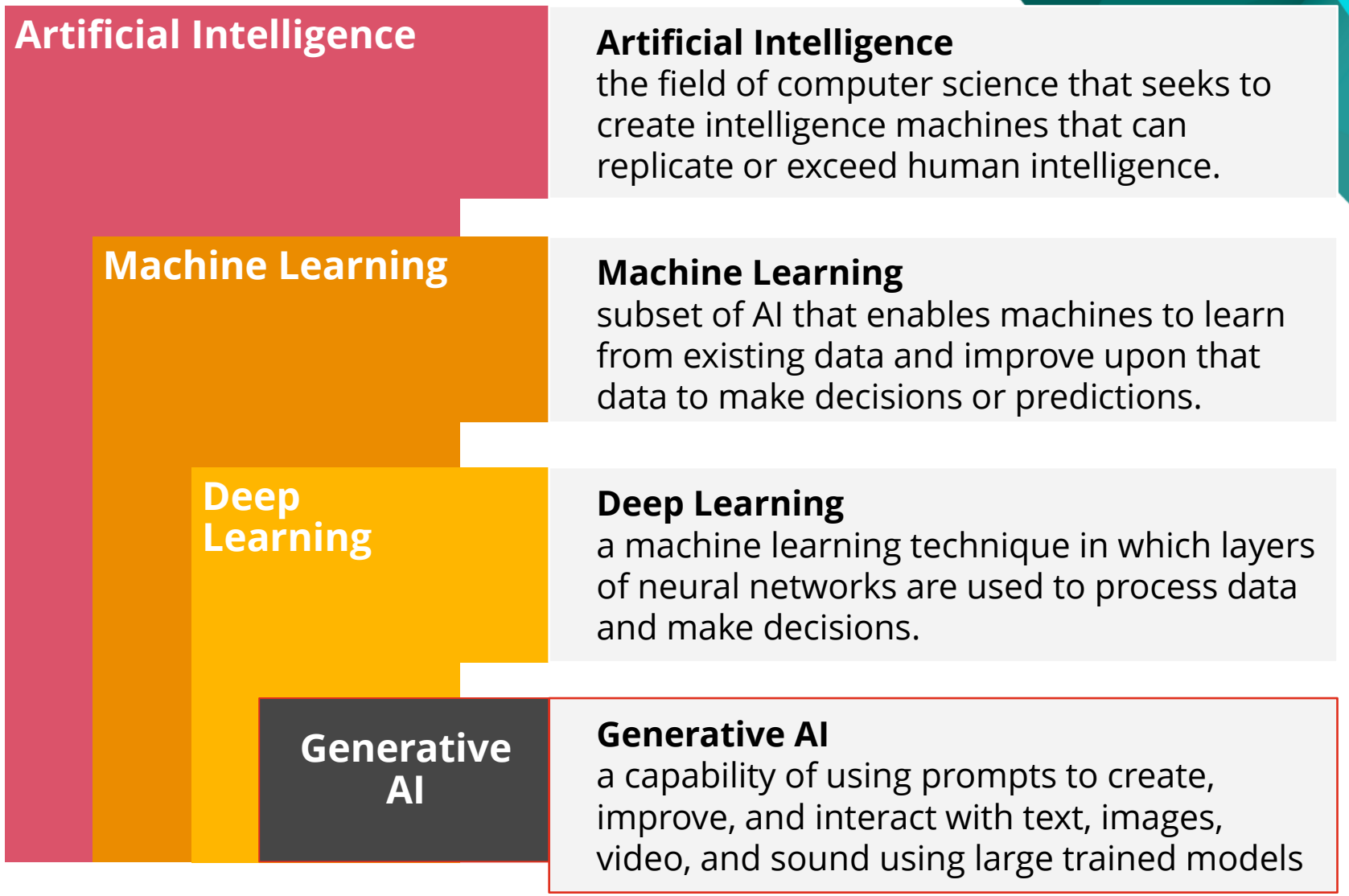
A quick poll…

Where are you and your company on your AI journey?



So what is Generative AI?

Generative AI is a subset of Deep Learning that involves training a model to generate new data that is similar to the training data is was given. This type of AI can be used to create art, music, text and even entire virtual worlds, among other applications.



Artificial Intelligence
the field of computer science that seeks to create intelligence machines that can replicate or exceed human intelligence.

Machine Learning
subset of AI that enables machines to learn from existing data and improve upon that data to make decisions or predictions.

Deep Learning
a machine learning technique in which layers of neural networks are used to process data and make decisions.

Generative AI
a capability of using prompts to create, improve, and interact with text, images, video, and sound using large trained models

Priorities

Model Cards

Einstein Opportunity Scoring

Einstein Opportunity Scoring helps sales teams and managers focus on the right opportunities so they can close more deals. Each opportunity is given a score from 1 to 99, which indicates how likely a deal is to close. Scores are available on opportunity records and list views. Customers can use scores with reports, Process Builder, and workflows. If you use Collaborative Forecasts, opportunity scores are also available on the forecasts page.

For more information about how Einstein creates opportunity scores, see Salesforce Help.

If you have questions or comments about the Einstein Opportunity Scoring model, contact Salesforce Customer Support or reach out to the Trailblazer community.

Model Details

Team Developing the Model

Sales Cloud Einstein engineering

Single-Customer and Global Models

Single-customer models are built using only the specific customer's data. Customers must meet the data requirements in order to use a single-customer model. If they don't have enough data, the global model is used by default.

The global model is built using data from multiple eligible Salesforce customers and is anonymiz
set of factors, including having sufficient data. Salesforce customers can opt out of having their
Customers who opt out of contributing their data can still use global models.

Both the single-customer and global models work the same way. Both are retrained on a regular ca
applies to single-customer models and global model, unless otherwise noted. For additional infor
on page 3.

Initial Release and Updates

- Single-customer model: Spring '17
- Global model: Spring '21
- Minor changes can occur throughout the release.

EDITIONS

Intended Use

Primary Intended Users

- Sales managers and sales reps
- Sales operations

Primary Intended Uses

- Identifying at-risk opportunities and revealing neglected deals that can help sales
- Prioritizing opportunities when there's a high volume of deals
- Understanding sales patterns across all opportunities

Out-of-Scope Uses

Opportunity Scoring is meant to be used to manage deals and deal flow. Uses other t
nonstandard sales processes or nonstandard use of the opportunity Stage field are ou
users who create records for deals only as the deals are being won and users not app

Factors

When building the model, we look at past closed opportunities (both closed-won and cl
following data. Be aware that some of the data is used for only single-customer models.

- Each opportunity's record details (both standard and custom fields), history, and relat
- The related account's record details and some record history
- Details about the related products, quotes, and price books

When an individual opportunity receives a score, the score is shown with several key fact
opportunity and indicate the reasons for the particular score. Providing the reasons for th
and take any necessary action.

Sometimes an opportunity has a score but doesn't show any or all key factors. This result
factors for any of them to help users understand how the score was calculated. Or, it coul
therefore, too difficult to summarize.

Factors contribute to the score in both positive and negative ways. A factor that is positiv
another. For example, a deal with an enterprise customer requires extra steps, such as leg
These extra steps delay the close date. But, because the delayed close date signals that th
with a higher score. However, for a deal with a small- or medium-sized business (SMB) cu
delayed close date is associated with a lower score.

Training and Evaluation

Model Training

To train and evaluate the single-customer model, we use a sample of data from the customer's own Salesforce data. Of the total sample data, 80 percent is used for training and 20 percent is used for testing and evaluation. We train multiple single-customer models with different configurations. We use the one with the best model performance metrics, as determined by the model tournament.

To train and evaluate the global model, we use data from multiple Salesforce customers that represent various industries. Of the total data, 75 percent is used for training and 25 percent is used testing and evaluation.

Model Tournaments

To ensure that we use the highest quality models, we evaluate each model against our model performance metrics. This evaluation process is known as a model tournament. First, we evaluate the single-customer models. When certain conditions are met, the performance of the "winning" single-customer model is evaluated against the global model. A combination of Area Under Precision-Recall (AUPR) and standard deviation (STD) is used for the tournament. Even though the global model is built and regularly tested for accuracy, the single-customer model often performs better than the global model.

A single-customer model can't be built if the Salesforce customer doesn't have enough data. In that case, the tournament between the single-customer model and the global model isn't run, and the global model is chosen. To see what data is required to build a single-customer model, see Data Requirements for Sales Cloud Einstein.

Evaluation Versus Runtime

When models are built, we evaluate performance against a sample of test data. For Einstein Opportunity Scoring, the sample data includes opportunity history for closed-won and closed-lost opportunities. This evaluation is used as a basis for the performance metrics used in the model training and model tournament. When the model is deployed, it's used to push scores to open opportunities. If the open opportunities have characteristics that are very different from the opportunities used for model training, performance metric results can differ in runtime. Models are re-trained regularly so that they're a better fit for recently closed opportunities.

Ethical Considerations

We attempted to avoid bias and other ethical risks by not including demographic data in the model. To avoid potentially reinforcing any unknown or unidentified biases in the model, human judgment should be applied to understanding and acting upon the model's outputs.

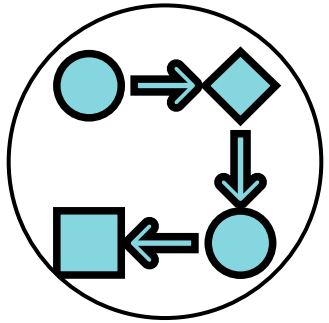
Priorities

Defense

- ✓ Get personally familiar with GenAI
- ✓ Update your company policies
- ✓ Create a plan to approve GenAI use (Task Force?)
- ⊘ (Don’t) Think “what is the best tool at this time”?
- ✓ Think about what is best for your program and backend into that.

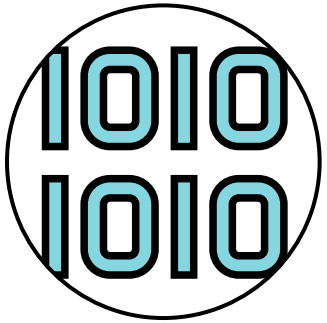
Priorities

Offense



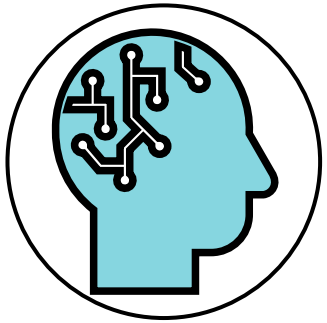
AI

- Automated workflows
- Q&A
- Translations



Machine Learning

- Test policies for weaknesses/clarity
- Investigations
- Risk Assessments
- Anti-trust detection
- Third party DD



GenAI

- Extracting insights (distil information from articles, conferences, etc.)
- Communications/engagement

Generative AI may not be self-aware, but can support knowledge work like no system before.

Capability	Use Cases
Text	• Contact center dialog • Improve Marketing content • Produce product documentation • Test plan creation • Summarize service requests • Analyze customer feedback
Code	• Generate programming code • Improve and optimize SQL • Explain and document code • Update code to new standards Convert code to a new language
Image	• Visualize scenarios based on data • Generate design & layout prototypes for apps & dashboards • Modify brand images
Data	• Validate data • Understand differences in data • Fill in missing data points • Summarize data

Law firm innovation