BUILDING EFFECTIVE TRAINING PROGRAMS

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Katherine M. Kelton, Vice President, Compliance, Aramark

Compliance at Aramark: Program Overview

- ## Structure
  - Reports functionally to chair of audit & corporate practices committee and administratively to general counsel
  - Hybrid approach – center-led function, dedicated roles embedded in divisions
  - Aligns with U.S. Sentencing Guidelines

- ## Objectives
  - Promote core values through effectuation of Business Conduct Policy
    - Connect commitment to service excellence to commitment to ethics and compliance
  - Enable a structured, transparent process to protect Aramark brand and maximize shareholder value in a sustainable, responsible way
  - Prioritize improvement of key business processes and controls ('closed loop')

Compliance at Aramark: Training

- **Structure/Process**
  - Stakeholders
    - HR – training & organizational development
    - Legal
    - Compliance
    - Content owner
  - Roles & Responsibilities
    - Regulatory updates
  - Accountability

- **System**
  - Audience identification
  - Translation
  - Delivery and tracking

4

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Agenda

- Finding a System

- Determine Roles and Responsibilities

- Staying Current

- Training the Right People

Finding a System

System

- Excel
- Access database
- Learning Management System (LMS)

Define Roles & Responsibilities

Stakeholders

- Subject Matter Experts (SMEs)
  - Compliance
  - Legal
  - Business people
- Human Resources
- Learning & Development

Staying Current

Resources

- Internal & External
    - Roles and Responsibilities

Training the Right People

- Use your system

- Use your resources

- Create a matrix

BUILDING EFFECTIVE TRAINING PROGRAMS

Suzanne Rich Folsom, General Counsel, Chief Compliance Officer & Senior Vice President - Government Affairs, United States Steel Corporation

Overview

- Getting Started
- Effective Risk Assessment
- Setting the Tone
- Maintaining the Program

Getting Started

Does your company have:

- International operations and/or sales?

- A business model relying on third parties?

- Government-related customers or vendors?

- M&A transactions involving international targets?

- Does the organization have adequate internal controls implemented?

- What is my budget?

- Do I conduct live training, in person or both?

- What are people calling the hotline about?

Risk Assessment

Elements of an Effective Risk Assessment

- Interviews
- Policy Review
- Risk Rating
- Response

Maintaining Our Program

Areas of Focus

- Safety
- Environmental
- FCPA
- Antitrust
- Anti-corruption
- Lobbying

Communication

- Compliance tips
- Email messages
- Policy updates

Monitor

- Hotline
- Training completion rates

Owning the Program

Role of the Board
- Tone from the top
- Fiduciary duties

What constitutes reasonable oversight?
- Regularly including ethics and compliance updates on board meeting agendas
- Reviewing and approving the code of conduct and other significant compliance-related policies
- Assessing the structure and resources of the compliance program
- Review training materials and training efforts