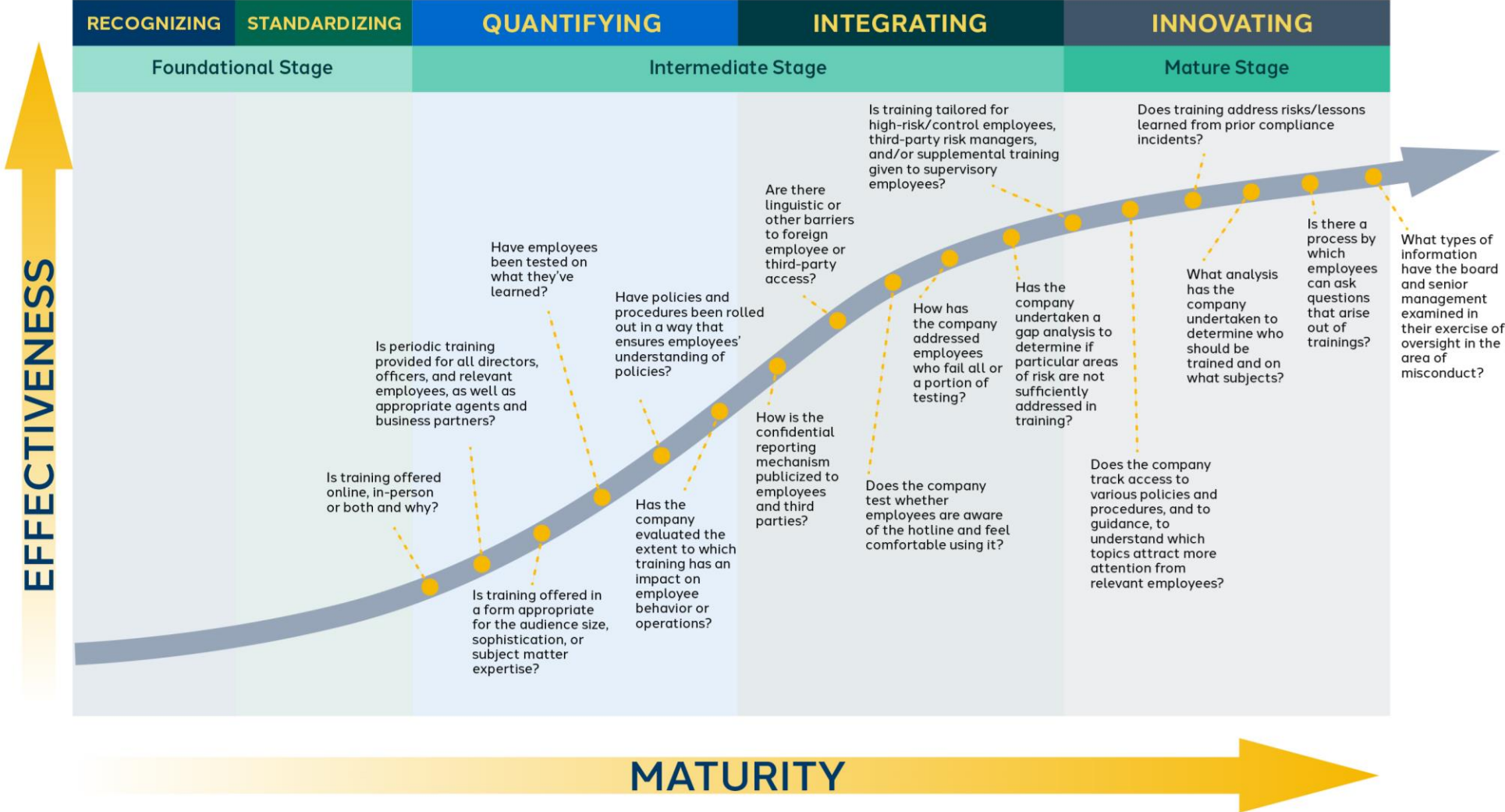


# COMPLIANCE TRAINING PROGRAM MATURITY VS. DOJ EXPECTATIONS



As maturity increases, training programs better mitigate business and regulatory risks and evidence compliance to the DOJ.



	<b>RECOGNIZING</b>	<b>STANDARDIZING</b>	<b>QUANTIFYING</b>	<b>INTEGRATING</b>	<b>INNOVATING</b>
Curriculum Content & Design	Training materials/content limited to a copy of Code of Conduct policies and procedures.	Generic training content and materials cover fundamental people risks (e.g., data privacy, bribery, money laundering).	Broad spectrum of E&C topics relevant to company. Embedded disclosure allows employees to report ethical concerns during E&C training. Short, engaging multi-media modules employee scenarios and simulations to help employees apply learning in work situations.	Tied to enterprise-wide risk profile and corporate values. Training modules are designed around learning objectives. Quizzes provide immediate context on wrong answers to reinforce learning. Training and testing on ethical decision support topics.	Includes ESG & sustainability standards. Training modules built directly into disclosure tools (e.g., Conflict of Interest). Content refreshed to reflect changes in risk profile and incorporate lessons learned. Modules provide means to ask questions that arise.
Learning Cohort	New employees.	Ad hoc, siloed subsets of employees.	Directors, officers, and relevant employees, as well as appropriate agents and business partners.	Training is profiled to employee-specific roles and responsibilities (e.g., managers and gatekeepers). Content is globalized for foreign employee and third-party learners.	Risk-based gap analysis determines who should be trained and on what subjects.
Training Frequency	Onboarding of new employees.	Sporadic.	Routine cadence, annually and/or semi-annually.	Microlearning episodes offered between routine trainings to reinforce retention.	Continuous or on-demand.
Learning Spaces	Code of Conduct policies shared informally, in person or through email.	In-person department meetings. Self-study materials.	On-line and asynchronous, possibly reinforced with in-person meetings and/or self-study materials.	Mix of learning spaces (video conference, intranet, LMS, in-person meetings) to maximize engagement.	Includes mobile devices and social collaboration tools such as Slack and Workplace. Code of Conduct interactive microsite is easily accessible and searchable and tracks employee interaction by policy/topic.
Data Analytics	Signed attestations that employees have read and understood Code of Conduct policies, rules and procedures.	Ad hoc tracking of training activities such as completion rates.	Training quizzes track and measure understanding of topics. Effectiveness data is siloed but accessible for aggregation of trends and behavioral indicators.	Collated on single dashboard. Confidence-weighted scoring pinpoints areas of risk/vulnerability within learning cohort.	Training is tied to Risk Management software to evaluate training impact on risk. Board reporting elevates oversight and understanding of impact.