



## ROUNDTABLE RECAP: November 13, 2019 Hosted by Ryder System

### Participating Companies

Accenture  
Arthrex, Inc.  
Carnival Corporation  
Citrix Systems, Inc.  
FedEx  
Hertz Corporation  
Ingram Micro, Inc.  
Millicom  
Phoenix Tower International  
Ryder System, Inc.  
Tech Data Corporation  
Unum Group  
World Fuel Services Corporation

**Topic 1:** Pilar Caballero, Vice President, Chief Compliance Officer & Chief Privacy Officer, Deputy General Counsel, Ryder System, Inc. led a discussion on “Utilizing data & metrics to support your anti-retaliation program: Using data-driven insights into program effectiveness, uncovering unconscious bias and facilitating communication across the organization”.

#### Key Points and Best Practices Included:

- Use of data to help drive a strong compliance culture and Anti-Retaliation Program
- Ryder’s Ethics and compliance Function “owns the retaliation policy”
- Investigation Process includes a unique form, if investigation includes retaliation
- Ryder’s Zero tolerance for retaliation
- Ryder’s uses its hotline data to identify areas of improvement and focus
- Ryder’s Retaliation Report charts :
  - 1) Reporter’s Identity ( Anonymous or Identity reporter at in-take)
  - 2) Reporter’s Employment status at time of report ( active, temporary employee or former employee) and intake method (helpline web, helpline phone or email)
  - 3) Alleged Wrongdoers’s Position level
  - 4) Termination reasons for “Terminated Employees” (includes voluntarily termination)
    - i. Analysis of % of employees still employed after reporting concern
  - 5) Time lapse between report date and termination date
    - Retaliation analysis by chart “ Employment Status of Named reporters”
    - Ryder’s issues a publication of real life stories based on hotlines cases
    - Ryder’s Human Resources team does the most of investigations

#### **Related BELA Resources:**

##### **VF’s Non-Retaliation Policy**

<https://bela.ethisphere.com/vf-non-retaliation-policy-english/>

##### **Focused Fact report on Preventing Retaliation**

<https://bela.ethisphere.com/wp-content/uploads/Focused-Facts-2018-Preventing-Realiation.pdf>

## Lilly's Speak Up Culture

<https://bela.ethisphere.com/speak-up-culture/>

## Lincoln Financial's reinforces the use of hotline and the option to anonymously report a concern

<https://bela.ethisphere.com/lincoln-hotline-video/>

**Topic 2: Ana-Paola (AP) Capaldo de Aoun, Director, Ethics & Compliance Officer, Tech Data Corporation led a discussion on "The New-ish Frontier: Evolutions in Third-Party Risk Management. From Screenings to Due Diligence to Onsite-Interviews, ways our practices have changed and developed, and the practical realities no one ever talks about"**

Techdata's journey towards its evolutions relating to Third Party Risk Management. Key Points and Best Practices included:

- Focusing on screening and Due diligence onsite-interviews
- Techdata support partners around the globe, including Europe and the Americas, Brazil, Argentina
- DOJ guidance has a very robust guidance on third-party
- Focusing on conducting an interview as part of their due diligence process and risk mitigation
- Risk-Based Due Diligence of Third-Party Intermediaries: A scorecard approach
  - High Risk Locations & Industries
  - Government Interactions
  - Types of Third Parties
  - Terms of Transactions
- Appropriate Due Diligence
  - Identify the appropriate Level of Risk
    - Low Level Diligence
    - Medium Level Diligence
    - High Level Diligence
  - Ensure Proper Risk Assessment in Place
  - Determine Which Third-Parties should be interviewed
- Techdata requires Third-Parties to answer questionnaires
- Techdata is focused on educating its third-parties on Anti-Bribery and Corruption: Best Practices Included:
  - Including an anti-bribery statement in the Code of Conduct Policy
  - Online or web-based training
  - Part of an onboarding questionnaire and process
  - Distribute or post printed materials for employees to review

- In-person on-site training
- Certification included in the contract materials
- Compliance Function does “in person visits” to High Risk countries
- Techdata involve the business area owners in the Third-Parties Interview process

**Related BELA Resources:**

**Third Party Risk Management Resources**

<https://bela.ethisphere.com/centers-of-excellence/third-party-risk-management/>

**Focused Facts Third Party Due Diligence and Requirements**

<https://bela.ethisphere.com/focused-facts-2018-third-party-due-diligence-and-requirements/>

**Ethisphere’s Special Report on Third Party Risk**

<https://bela.ethisphere.com/ethisphere-third-party-risk-2/>

**Topic 3: Randy Klatt, Vice President, Ethisphere Services** led a discussion on Maximizing the Effectiveness of Managers, Data Insights Into Leading Practices of World’s Most Ethical Companies.

**Related BELA Resources:**

**2019 World Most Ethical Companies Insights Report – Maximizing the Effectiveness of Managers**

[2019 WME Insights Report Volume 3](#)

For additional guidance on the resources available to the BELA through the Member Hub, please contact

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