



**JACKI CHESLOW, CCEP, CCEP-I, CRM
DIRECTOR BUSINESS ETHICS & COMPLIANCE**





Responsible for overseeing Avis Budget Group's global Business Ethics & Compliance and Record & Information Management Programs in more than 25 countries. More than 20 years experience in assessing risk, remediating and monitoring of risks associated with business activities, process and systems, as well as policy management, training and program measurement.

Member of SCCE, NJ Corporate Compliance Roundtable, ARMA International.

<https://www.icrm.org/about> 2

RECORD PROBLEMS = COMPLIANCE PROBLEMS

**Costco to Pay \$12 Million
Penalty for Poor Pharmacy
Controls**

Justice Department cites improperly filled prescriptions, poor record-keeping and inadequate inventory monitoring


Associated Press
Jan. 19, 2017 2:34 p.m. ET

**PG&E recommended for huge fine for
poor record keeping**

By Bob Eggleston Updated 6:08 pm PDT, Wednesday, June 1, 2016

**The ATF's Record-
Keeping Issues
Extend to Its Confidential
Informant Program**

Author: Dino Grandoni, The Washington Post
Updated: April 11 Published April 11



3

RECORD PROBLEMS = COMPLIANCE PROBLEMS

FCPA Pilot Program
failure of which ca

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA
- against -
OCCIDENTAL CAPITAL MANAGEMENT
GROUP LLC,
Defendant.
UNITED STATES OF AMERICA
vs.
TEVA LLC (RUSSIA)



DON'T LET
THIS
HAPPEN TO
YOU

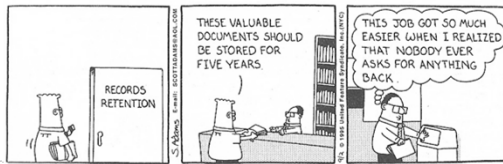
During the investigation, the

cause of issues that resulted in a
big *failures to produce important*,
he instances producing documents
the documents existed and should
enise counsel prior to their

at resulted in delays to the early
id assertions of attorney-client
basis in response to certain Fraud

4

RECORD PROBLEMS = COMPLIANCE PROBLEMS

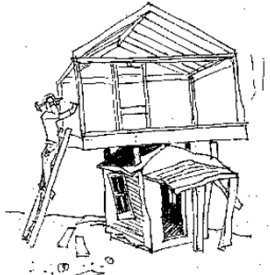


5

RECORD PROBLEMS = COMPLIANCE PROBLEMS



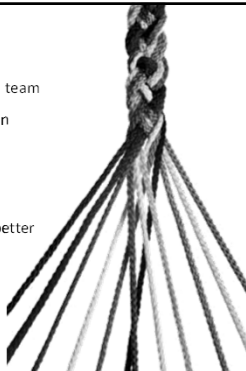
6



RECORD PROBLEMS = COMPLIANCE PROBLEMS

- | Affect risk assessments and investigations
- | Affect the organizations ability to respond promptly
- | Affect the ability to self-report, correct
- | Affect resulting enforcement action: strategy/cost

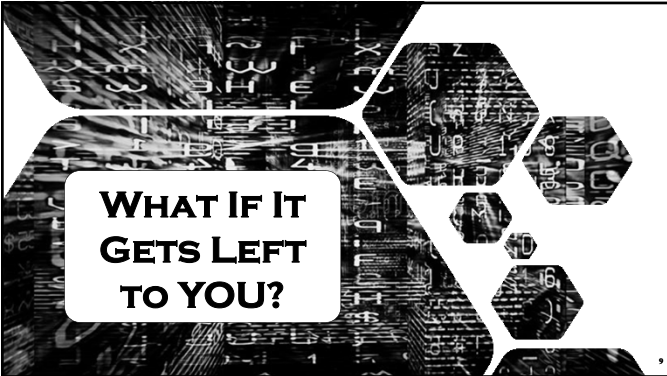
7



EXISTING RIM PROGRAM

- | If you haven't already done so partner with the RIM team
- | Get familiar with the requirements – you'll get buy in quicker if you speak their language
- | Work together to identify synergies between their program and yours
- | The more attention the RIM program gets and the better it is enforced – the more prepared you'll be

8



WHAT IF IT GETS LEFT TO YOU?

9

- A2** maybe illustrate that records mgmt provides a foundation for being able to properly carry out compliance functions. Without that foundation, it's like a "leaning tower" or "house of cards"

Author, 8/24/2018

SO MANY HATS AND ONLY ONE HEAD

- | Policy Management
- | Risk Assessment and Mitigation
- | Training
- | Allegations and Investigations
- | Multiple Risk Areas
 - | RIM Policy and Retention Schedule
 - | RIM subject matter expert on IT projects
 - | Litigation Hold Management
 - | Oversee Record Coordinator Network
 - | Manage offsite storage accounts
 - | Oversee shred program



10

MERGING PROGRAMS

Business
Ethics &
Compliance
Program

Record &
Information
Management
Program



11

MERGING PROGRAMS

- | You need to understand it before you can do it
- | You don't need to be an expert overnight
- | RIM requires on the job learning
- | RIM doesn't just focus on business records – the focus is on all of the organization's information

- | Paper or digital doesn't matter
- | You are already doing it – your program is being documented / recorded
- | The goal of any RIM program is to ensure you have what you need when you need and that you get rid of it when it's no longer needed

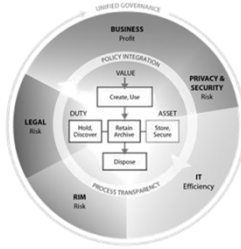
YOU CAN DO THIS

12

THE MERGING OF RIM AND COMPLIANCE

BUILD A SUPPORT NETWORK

- | Partner with IT, Legal, Information Security and Privacy – their goals are your goals
- | GDPR requires local data protection officers – use your record coordinator network - dual roles ensure that the Privacy Office shares responsibility for managing the network
- | Dual messaging, i.e.
 - “The best way to protect your data is to delete”
 - “Ensure GDPR compliance by following the Company's Retention Schedules”
- | In person compliance workshops and training are a great place to build support for your RIM program



Information Governance Reference Model / ©2012 / v. 3.0 / idm.net

13

THE MERGING OF RIM AND COMPLIANCE

CROSS POLLINATE

- | Incorporate clauses related to recordkeeping in all of your policies referencing the RIM Policy and Retention Schedules and providing direction on where to get more help, i.e., intranet, etc.
- | Update your Training
 - | RIM: In addition to litigation hold, discuss the impact of recordkeeping on a bribery investigation or antitrust action – bring compliance into your RIM training
 - | ABAC: Talk about how over and under retention impacts the accuracy and completeness of your records and prevents violations of SEC regulations
 - | Competition: When discussing what to do in the event of a Dawn Raid talk about in how proper RIM practices make it easier to ensure the regulators get only what they are asking for and no more
- | Incorporate RIM into your Risk Assessment – we do a combined Global Privacy and Data Protection section which discusses RIM requirements in some detail

14

THE MERGING OF RIM AND COMPLIANCE

CROSS POLLINATE

Never miss an opportunity to talk about the RIM Program



15

CROSS POLLINATE

Never miss the chance to take advantage of a legal crisis



16

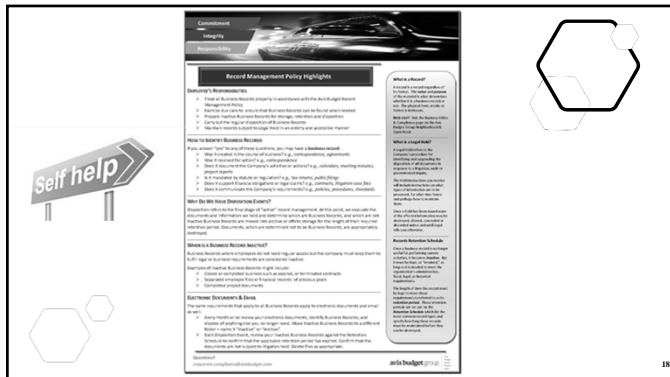
[illegible]





MAKE IT EASY

- | In addition to developing training for all employees as well as one specifically directed at Record Coordinators to build their subject matter expertise, there is a dedicated section of the Business Ethics & Compliance website for RIM:
- | Automated decision tree to determine what is a "business record"
- | Training module on sending and retrieving records to and from offsite storage which demonstrates how to pack boxes, label and arrange shipment
- | Record Coordinator directory by location/department so that employees can get their inquiries addressed by the local SME



17

[illegible]



THE TIME IS NOW

TO ORGANIZE YOUR PAPER AND ELECTRONIC FILES!

Reduce your paper files
on-site and archive
inactive business records

Get rid of
unnecessary
office records

Review electronic records and emails.
Delete unnecessary emails
and archive inactive business records

avis budget group

Records Management

Questions? Contact Corporate Records at avisbudget.com

19

[illegible][illegible]

THE MERGING OF RIM AND COMPLIANCE

DON'T TRY TO DO IT ALL YOURSELF

- Each member of our Compliance team has completed a basic records management course
 - Records Management University provided by Feith Systems & Software, Inc.
<https://www.feith.com/records-management-university-webinar-course/>
 - National Archives provides a Certificate Course in Records Management
<https://www.archives.gov/records-mgmt/training>
 - ARMA International is the world's leading information management membership organization - Membership is \$175 and gives you access to free and paid training, resources and much, much more – www.arma.org
 - Local ARMA chapters hold regularly educational sessions and you do not need to be a member to attend. Find the chapter in your area and see what they are offering - <https://www.arma.org/page/LocalChapters>
 - Establish a group mailbox so that inquiries can be addressed on a timely basis at corporate.records@avisbudget.com by any member of the team

RIM AND THE COMPLIANCE PROFESSIONAL

TAKEAWAYS

- | Consider records retention as critical to your compliance program
- | Build a Support Network
- | Cross Pollinate
- | Make It Easy
- | Don't Try to Do It All Yourself

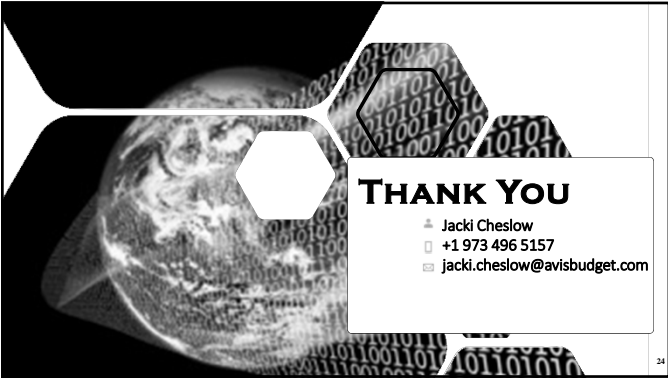


23



Got Questions

23



THANK YOU

Jacki Cheslow
+1 973 496 5157
jacki.cheslow@avisbudget.com

24
