




## IDEAS FOR SUCCESS IN THE IMPLEMENTATION OF AN INTEGRITY PROGRAM

2019 São Paulo Brazil Regional Compliance & Ethics Conference  
August 30, 2019



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### Agenda

- Presentations
- Introduction
- Training & Communication
- Ethics and Compliance Ambassadors
- Compliance Officers Collaboration
- Q&A

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## Presentations

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- Daniele Pescadinha has a law degree, a LLM in International Business in University of British Columbia and extension in Trade Commerce in British Columbia Institute of Technology and Compliance Training Certification by - LEC - Legal, Ethics and Compliance.
- In 2014, Daniele joined in Dover Fueling Solutions Corporation, as Regional General Counsel & Compliance Officer responsible in Brazil and Latin America Region for all legal aspects of the business, providing expertise in consultancy, legal advice and any necessary actions as a result of decisions by senior management, developing legal strategies for contract negotiations and business partner relationships, representing the company in Court of law and also with administrative and regulatory authorities and coordinating outsourced legal services to control time, cost and management report and also providing analysis and negotiation of these contracts.
- In Compliance, responsible for compliance and enforcement of Code of Conduct, Compliance Training and Communication Program, as well as performing ethics investigations.
- Daniele is a responsible coordinator in Rio de Janeiro of Compliance Women Committee and active participant of compliance study groups and initiatives in Brazil as Ethos Institute and Corporate Movement for Integrity and Transparency.
- In this year, Daniele was nominated of award of Compliance Champion of Year in Women in Compliance Awards.
- Contact: [daniele.pescadinha@doverfs.com](mailto:daniele.pescadinha@doverfs.com)



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## Presentations

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- Kelly Gama has a law degree, a post-graduate diploma in Corporate Law in Brazil and is a Certified Compliance & Ethics Professional International (CCEP-I).
- Kelly started her career at renowned law firms in the corporate and regulatory areas.
- In 2008 Kelly joined BP, British oil and gas company, as Legal Counsel for Brazil, Caribbean & South America providing in house legal support, being also responsible for Ethics, anti-bribery and Competition Law consultation and trainings. Kelly participated in regional and global projects, including an assignment to South Africa in 2013.
- In 2016 Kelly joined Alstom, French transport/mobility sector company, as Legal & Compliance Officer responsible for the compliance area in the Latin America Region covering the Integrity Program and the coordination of E&C related claims (anti-trust and criminal).
- Kelly is active participant of compliance study groups and initiatives in Brazil – Ethos Institute, UN Global Compact - Brazil Network, as well as, international initiatives – 2018 Transparency International School on Integrity in Lithuania and the 2019 Compliance Week Annual Conference in Washington, D.C.
- Contact: [kelly.gama@alstomgroup.com](mailto:kelly.gama@alstomgroup.com)



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## Presentations

- Mayra Collino joined Siemens in 2010 as an administrative assistant in Sao Paulo, Brazil and had a career change when she had her first contact with Compliance area in 2012.
- Since 2016 she has been part of Compliance team as Sr. Compliance Analyst at Siemens Brazil. In this role she is responsible for Compliance Training & Communication Program, Ambassadors Program, Compliance Risk Assessment, Collective Action and special projects such as Pro-Etica and EduComEtica (ethical social board game to children).
- Mayra also supported Mobility area including due diligence process, conflict of interest, AML, Gifts and Hospitalities, Human Rights and others. Mayra has earned an Executive Training Program of Governance, Risk and Compliance Certification at KPMG Business School, a Certified Compliance & Ethics Professional International (CCEP-I), and a Compliance Officer Training Certification by LEC - Legal, Ethics and Compliance.
- A very active person on collective action initiatives, Mayra is part of UN Global Compact Communication Group - Network Brazil, Alliance for Integrity, Ethos Institute. Outside of work she enjoys traveling had experienced living in China and US.
- Contact: [mayra.santos@siemens.com](mailto:mayra.santos@siemens.com)



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## Introduction



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# Introduction

 ef·fec·tive·ness  
/iˈfektɪvnes/

*noun*

the degree to which something is successful in producing a desired result; success.  
"the effectiveness of the treatment"

*synonyms:* **success**, successfulness, **efficacy**, productiveness, fruitfulness, **potency**, **power**;

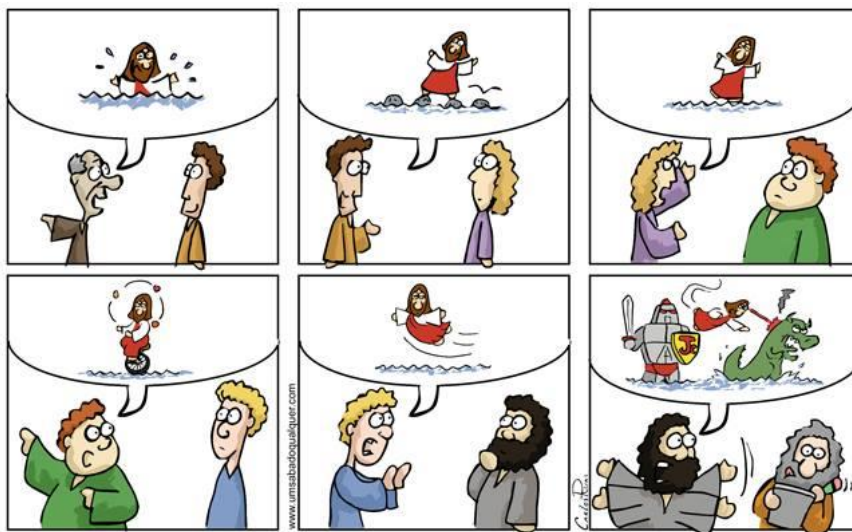


- Brazilian Clean Companies Act and New DoJ Guidelines.

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## Training & Communication

How is your Compliance Awareness doing?



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## Training & Communication

Training – what else can you do to reach employees?



Start

**Code of Conduct**  
Test before  
onboarding



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## Training & Communication

Don't forget you have different audiences.



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## Training & Communication

Don't forget you have different audiences.

Antes



Depois



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## Training & Communication

What can you do to engage your employees?

### Sign the White Board

Ask employees to demonstrate their support to the Code of Conduct by signing at board



### CEO, Compliance & You

Invite employees to have lunch with the CEO and the Compliance Officer to have a informal conversation about ethic in business & compliance

### Compliance Games

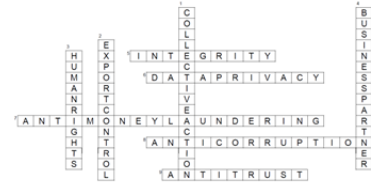
Invite employees to play a board or digital game.



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# Training & Communication

## What can you do to engage your employees?



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## Ethics and Compliance Ambassadors

- Objectives:
  - Support the implementation of the Integrity Program
  - Promote the Integrity Culture
  - Be a key contact regarding E&C questions
- Examples of Activities:
  - Integration and Awareness sessions.
  - Participation in the Communication channels (Teams and Chatter).
  - Support to E&C activities (trainings, campaigns, E&C Day, etc.).
  - Monthly and quarterly conference calls.
  - “Logbook” (consults received).
- But first:
  - Establish rules for the Program and TRAINING.

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# Ethics and Compliance Ambassadors



Unrestricted

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# Ethics and Compliance Ambassadors



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## Compliance Officers Collaboration

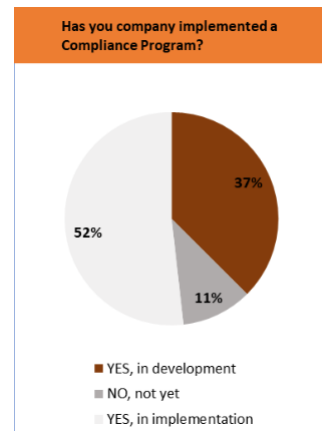
- Compliance Woman Committee
  - ✓ Inclusion and Social responsibility



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## Compliance Officers Collaboration

- Periodically bench marketing with other companies.
- Collective actions.



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## Compliance Officers Collaboration

- Get + share ideas and best practices.
- Discuss issues and Updates.
- MAKE FRIENDS!!



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## Questions & Answers



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THANK YOU!

