

Exploding Training Myths

How Marathon Oil, Phillips 66 and
Other Organizations Build Affordable
Compliance Training that Works



Steven Gyeszly
Chief Compliance Counsel



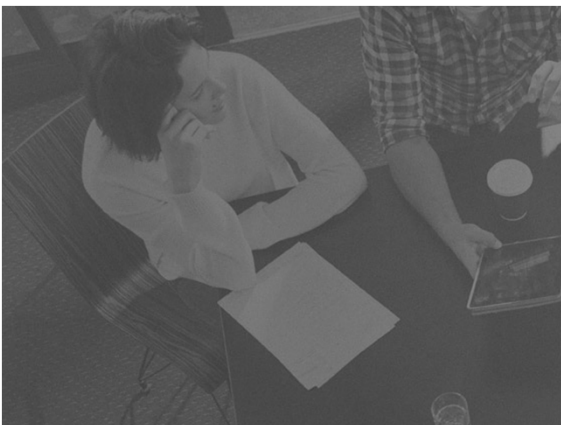
Adriana Herrera
Vice President, Compliance and
Ethics Officer



Moderator



Dan Brown
Strategic Relationship Officer



Agenda FOR TODAY

**OUR
SURVEY**

**WHAT TRAINING ISSUES
DO YOU WANT TO
ADDRESS IN TODAY'S SESSION?**

**SURVEY
QUESTION**

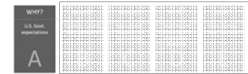
Which of the training issues below do you find most challenging?

WHY? U.S. Govt. expectations A	WHAT? Content - Look & feel; substance B	WHEN? Amount and frequency of touch-points C	WHO? Targeting and capturing the appropriate audience D	HOW? More training, fewer resources E
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SURVEY QUESTION



When it comes to U.S. Government expectations, my biggest challenge is:

Understanding what these expectations are

Relaying these expectations to senior management

Embedding these expectations in our training program

Documenting that we have met these expectations

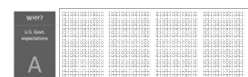
Maintaining a balance between compliance standards and business needs

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BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS



WHY?

U.S. Govt.
expectations

A

U.S. GOVERNMENT EXPECTATIONS

- U.S. Sentencing Guidelines
- Dept. of Justice Manual
- Dept. of Justice/Securities Exchange Commission FCPA Resource Guide
- Dept. of Justice "Evaluation of Corporate Compliance Programs"
- Enforcement Actions

SURVEY QUESTION



When it come to **Content look & feel, and substance**, my biggest challenge is:

Finding a good content vendor partner

The increased quality expectations of my leaders

The balance between customization and standardization

The need to do more than a 'one and done' annual course (i.e. behaviour change)

Updates (and localization)

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BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS



WHAT?

Content - Look & feel; substance

B

LOOK & FEEL

- Internal expectations vs. external requirements
- Going beyond traditional live or online training
- Out of the box = out of sight, out of mind

SUBSTANCE

- Quality over quantity
- Customize, customize, customize
- Update, update, update

[illegible]

Building consensus on what they should be

Integrating compliance into other areas such as culture and operations

Touchpoints are reactive and not proactive

Building support and buy-in at senior levels

Time to launch: it takes too long to get from incident to targeted campaign response



C

WHEN?

Amount and frequency of touch points.

Amount and frequency of touchpoints

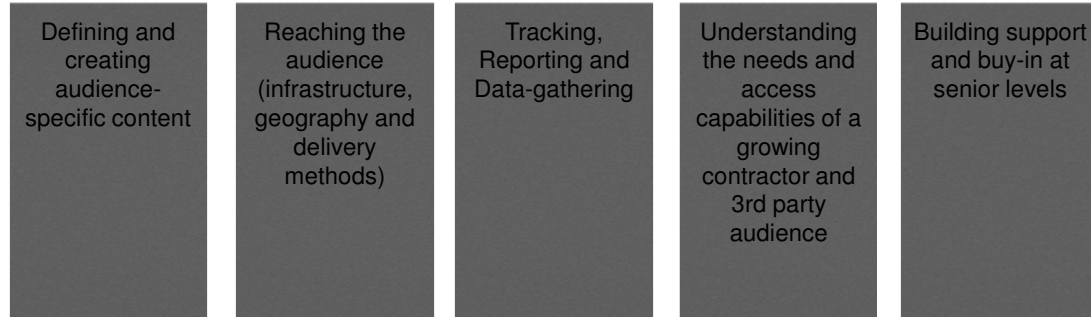
C

- “Too much is not enough”?
- Obtaining buy-in to ensure sufficient amount and frequency
- Compliance training as component of a broader campaign
- Strategies

SURVEY QUESTION

WHO?	Targeting and capturing the appropriate audience
D	

When it come to **Targeting and capturing the appropriate audience**, my biggest challenge is:

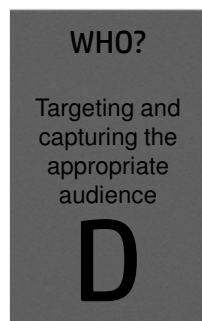


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BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS

WHO?	Targeting and capturing the appropriate audience
D	



TARGETING

- Overlooked aspect of training
- Appropriate targeting can provide significant credibility

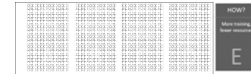
CAPTURING

- Strategies
- “Acceptable” completion rate
- Burden of responsibility in ensuring completions
- Strategies

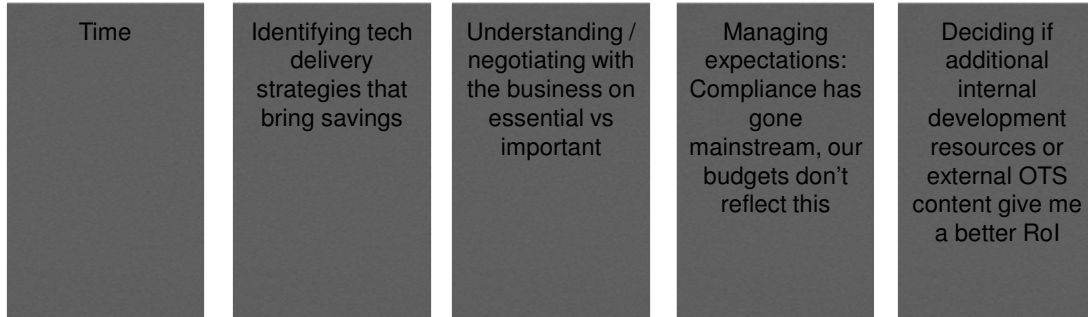
SPECIAL AUDIENCE CONSIDERATIONS

- Board
- New employees
- Contractors
- Other third parties

SURVEY QUESTION



When it comes to delivering the same, or often even more training, while working with resource and budget freezes or cuts, my biggest challenge is:

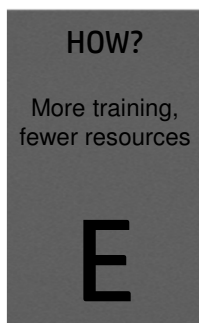
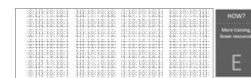


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BUILDING AFFORDABLE COMPLIANCE TRAINING THAT WORKS



INTERNAL COST SAVINGS

- Build in savings during initial planning
- Willingness to take a risk
- Leveraging internal resources
- Strategies

EXTERNAL COST SAVINGS

- The Miracles had it right – “Shop Around”
- New technologies
- Outsourcing
- Strategies

WHERE NOT TO SKIMP

- Translation
- Completion efforts
- Strategies

WHAT HAVE WE **LEARNED?**

A banner image with a dark grey background. On the left and right sides, there are faint, grayscale images of people. In the center, the text "SURVEY WRAP UP QUESTIONS" is written in large, bold, white capital letters.

SURVEY WRAP UP QUESTIONS

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**SURVEY
WRAP UP QUESTIONS**

How would you describe your compliance training strategy?

Consistent, articulated, measurable A	Confused and inconsistent B	What strategy? C	Meh. Select key elements are in place, but we have a way to go D
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**SURVEY
WRAP UP QUESTIONS**

How is compliance training perceived in your organization?

A necessary evil A	A useful reminder of the rules and expectations B	A great way to boost our compliance culture C	Not taken seriously D
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SURVEY
WRAP UP QUESTIONS

You know your compliance training program is effective because...

We measure carefully and gather hard data	We have anecdotal evidence but no hard data	Actually, we <i>don't</i> know if our program is effective	Ha! It is hard enough to just deliver the training
A	B	C	D

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SURVEY
WRAP UP QUESTIONS

We have a strong culture of compliance in our organization:

Strongly Agree	Agree	Disagree	Strongly Disagree
A	B	C	D

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Thank You!



Steven Gyeszly



Chief Compliance Counsel

Steven is Chief Compliance Counsel for Marathon Oil, a global energy exploration and production company. In this role, Steven develops and leads a pragmatic compliance program with initiatives that are deployed across the entity. Prior to joining Marathon Oil, Steven served in escalating compliance leadership roles at a global oilfield services provider where he helped build a global compliance framework from the ground up while simultaneously responding to multiple government investigations. Before moving in-house, Steven worked at an international law firm where he focused on advising and defending clients in government investigations and commercial litigation.



Adriana Herrera



Vice President, Compliance and Ethics Officer

Adriana Herrera is Senior Global Compliance Analyst at Phillips 66. In her role, she is responsible for various facets of the compliance program.

She previously held positions at Weatherford International and Reliant Energy.

Adriana received a Bachelor's Degree from LeTourneau University and her paralegal certification from The Center for Advanced Legal Studies. She has been in the Compliance industry since 2000 and received her CCEP in 2005.

Moderator



Dan Brown



Strategic Relationship Officer

Dan has an extensive background in e-learning, blended learning, classroom education and learning design for adult audiences.

He oversees the learning strategy for partnerships with large, global companies that have delivered business savings and returns in excess of \$500 million.

In his spare time he wishes he had enough patience to meditate.