

# Culturally Sensitive & Regionally Specific

Jannica Houben, Director, Ethics & Compliance, Europe

Ana-Paola (AP) Capaldo de Aoun, Director, Ethics & Compliance, Americas

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## Introduction



**Jannica**

Director,  
Ethics & Compliance  
Europe

- ✓ Lawyer by training
- ✓ Worked in the Competition Law Department of Clifford Chance for 3+ years
- ✓ Leads the Ethics & Compliance program for Tech Data in Europe
- ✓ Global responsibility for training, policy & communication
- ✓ Specializes in Competition Law, Internal Investigations and Ethics & Compliance training and communication



**Ana-Paola (AP)**

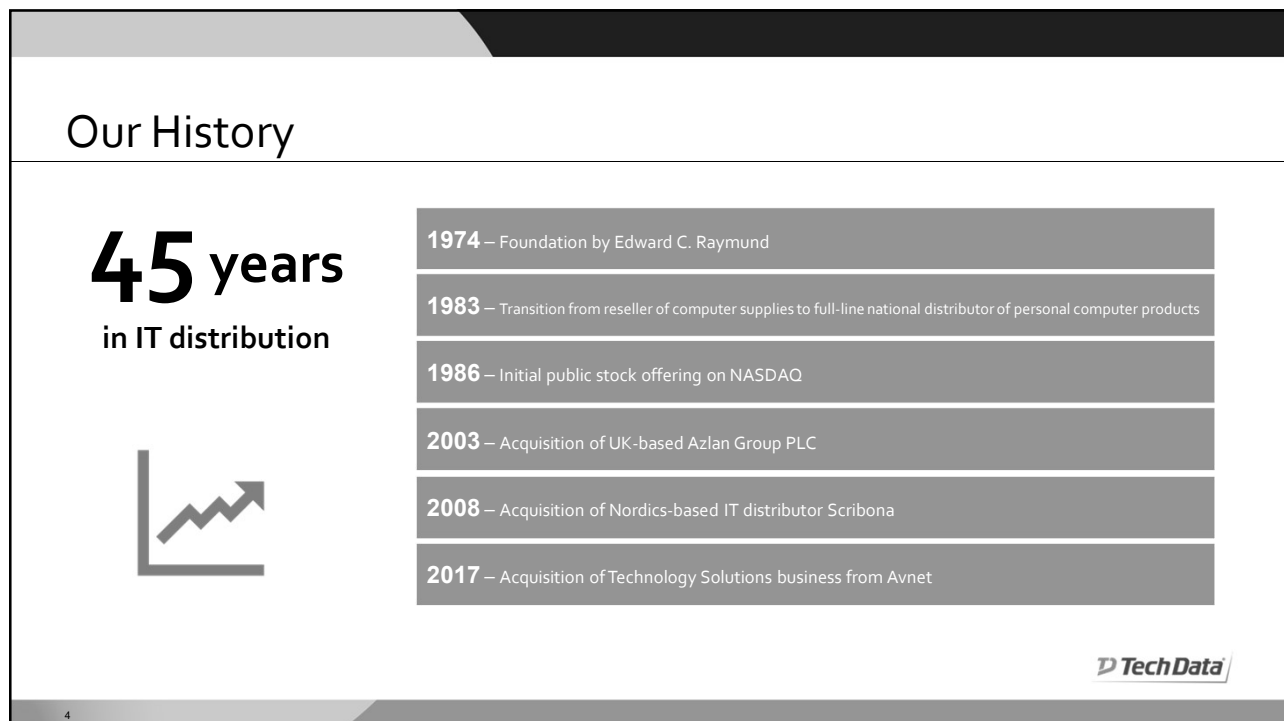
Director,  
Ethics & Compliance  
Americas

- ✓ Lawyer by training
- ✓ Worked at a large education company prior to Tech Data
- ✓ Leads the Ethics & Compliance program for Tech Data in the Americas
- ✓ Global Responsibility for the Company's Due Diligence Program
- ✓ Focuses her work on the FCPA, Internal Investigations, and other regulatory matters

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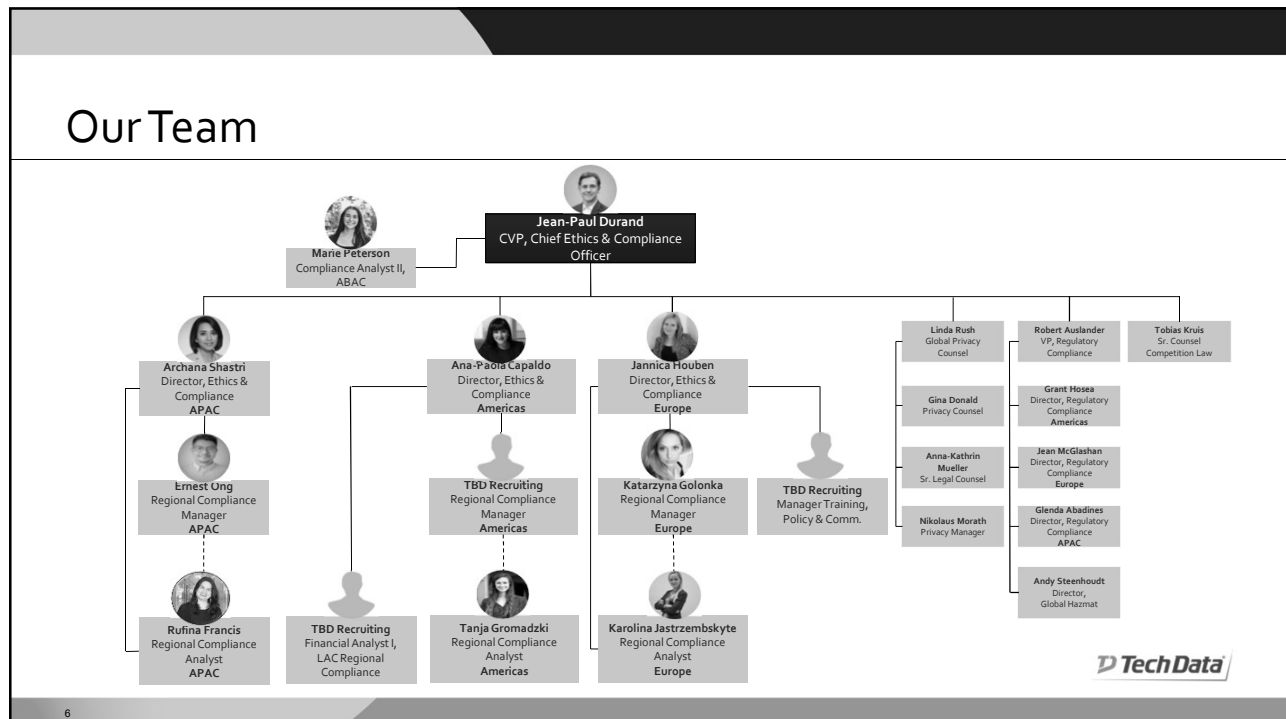
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## Our Shared Values

- ▶ Integrity
- ▶ Excellence
- ▶ Accountability
- ▶ Collaboration
- ▶ Inclusion

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## Our Regions



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## 3, 2, 1... Start!

### Open up with a sample generic training

- Then Xxxx
- Then Analyze individually what would work / what wouldn't based on the location



**Country**



**Audience**



**Training Needs**



**Communication**




**Get on a plane**

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## Know your Country

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- Language
- Cultural backgrounds
- Geopolitical
- Compliance culture

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## Know your Audience

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- Type of employee
- Type of operation
- History of the operation (legacy? Acquired? Small biz to public co?)
- Generational (training mediums/attention span/access to computers)

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## Training needs



- Active shooter training
- Speak Up training & differences in speak up culture around the world; differing benchmarks = differing KPIs
- What kinds of cases / examples do you use in-country; don't come off as 'US-centric'

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## Promoting a Speak Up Culture In a Multinational Company



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## Agenda

### ► Objectives

### ► Introduction

- Ethics and Compliance Program
- Cultural Differences
- Tools | Compliance Visits
- Tools | Posters & Digital Signage
- Tools | Ethics Advisors

### ► Speak Up Training



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## Objectives



### Discuss Tools

Discuss tools for evaluating company culture



### Provide Tips

Provide practical tips of how to improve the Speak Up culture at a multinational company



### Avoid

Avoiding a one size fits all approach



### Engage Management

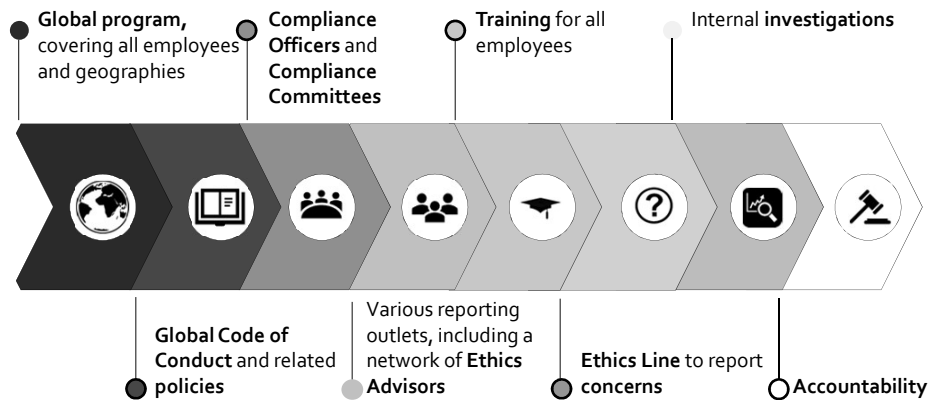
Engaging management to get the message out and foster a Speak Up culture



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## Introduction - Ethics and Compliance Program



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## Introduction - Cultural Differences

### Taking into account cultural differences

- ▶ Translations of materials
- ▶ Languages for training
- ▶ Sensitivity to differences when drafting Code and policies
- ▶ Limited use of Ethics Line due to local laws



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## Introduction – Tools – Compliance Visits

### Agenda

- Meetings with Management
- Meeting with HR
- Instructor-led training by priority
- Strategic meetings with functional groups
- Conduct substantive trainings
  - Anti-bribery and Anti-Corruption
  - Competition Law
- Meetings with REA/EAs – onboarding where needed
- Speak-up Trainings
- 'Compliance Visit Checklist' – Intranet, Posters Display, EA awareness, communication and resource awareness, opportunities to 'Market' the Program



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## Introduction – Tools – Posters & Digital Signage



### Ethics and Compliance Video



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## Introduction – Tools – Ethics Advisors

- ▶ Ethics Advisors are appointed based on the recommendation of local management and the Ethics and Compliance Department.
- ▶ The EA is a point of contact for employees.
- ▶ EAs are involved in ongoing training initiatives, supporting the administration of Program and facilitating associated communication and awareness efforts.



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## Ethics Advisors - Responsibilities

1. Be a resource for employees with compliance-related questions or concerns
2. Conduct New Employee Orientation Sessions
3. Train offline employees in the Logistics Centers (if applicable)
4. Monthly Touchpoints with their REA
5. Support Management with the elearning training
6. Support the Ethics & Compliance Department
7. Quarterly E&C Activities
8. Communication & Awareness



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## Ethics Advisors Global View

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| David Vetter, Chief Legal Officer                          |                          |                                  |                                    |                                |   |                                 |                                    |  |                                      |                                       |                                 |
|--|--------------------------|----------------------------------|------------------------------------|--------------------------------|---|---------------------------------|------------------------------------|--|--------------------------------------|---------------------------------------|---------------------------------|
| Jean-Paul Durand, CVP, Chief Ethics and Compliance Officer |                          |                                  |                                    |                                |   |                                 |                                    |  |                                      |                                       |                                 |
| Jannica Houben, Director, Ethics & Compliance, Europe      |                          |                                  |                                    |                                |   |                                 |                                    |  |                                      |                                       |                                 |
| IBERIA & ITALY REGION<br>REA: George Troughton             |                          |                                  | IR & UK REGION<br>REA: Liane Fawlk |                                | BENELUX REGION<br>REA: Wilco de Reuver              |                                 | CENTRAL REGION<br>REA: Dirk Pethke |  |                                      | FRANCE REGION<br>REA: Samy Bensoussan |                                 |
| Italy  | Portugal                 | Spain & TD<br>EUS&O              | Ireland                            | UK                             | Belgium   | Netherlands                     | Switzerland                        | Austria                                | Germany                              | David Metoudi<br>Bussy St Georges     | Jose Rodrigues<br>Columes       |
| Vincenza Albanese<br>Milan                                 | Ricardo Mendes<br>Lisbon | Laura Fuentes<br>Barcelona       | Glenn Mullins<br>Dublin            | Joshua Herriman<br>Basingstoke | Nico Van<br>Droogenbroeck<br>Aalst                  | Kristel Donnas<br>Breda         | Markus<br>Heimgartner<br>Rohrmoos  | Gefinde Krainer-<br>Steiger Vienna     | Daniel Looch<br>Nottetel             |                                       | Dennis Cals<br>Columes          |
| Raffaella Rana<br>Milan                                    | Jose Ramos<br>Porto      | Armaine Ichon<br>Barcelona       |                                    | Peter Dickson<br>Basingstoke   | Karinne Van<br>Valckenburgh Aalst                   | Bas Van Swol<br>Breda           | Diethild Nieland<br>Rohrmoos       | Johannes Foeger<br>Vienna              | Ralf Krüger<br>Munich                |                                       |                                 |
| Cristina<br>Campomissi<br>Milan                            |                          | Daniel Sanchez<br>Barcelona      |                                    | Rachel Lucas<br>Basingstoke    | OPEN<br>Ternat                                      | Bart Gobel<br>Breda             |                                    |  | Andrea Dammann<br>Munich             |                                       |                                 |
|  |                          | Miguel Pavillard<br>Barcelona    |                                    | Ewa Tywoniuk<br>Magna Park     | OPEN<br>Dieren                                      | Nico van der Baan<br>Norden     |                                    |  | Anna Anstett<br>Leipzig-Eichendorfen |                                       |                                 |
|  |                          | Sergi Crespo<br>Barcelona        |                                    | Jane Sharp<br>Basingstoke      | Koen Oprijns<br>Ternat                              | Gabry Jacobs<br>Eindhoven       |                                    |  |                                      |                                       |                                 |
|  |                          | Lourdes Sanchez<br>Alcorcon      |                                    | Matthew Rackley<br>Basingstoke | Kathleen Leekens<br>Antwerp                         | Elena Södrös Molag<br>Tafelberg |                                    |  |                                      |                                       |                                 |
|  |                          | Pedro Romero<br>Alcorcon, Madrid |                                    | Simon Richardson<br>Warrington | Inge Penne<br>Antwerp                               |                                 |                                    |  |                                      |                                       |                                 |
|  |                          |                                  |                                    | Cheryl Melvin<br>Warrington    |   |                                 |                                    |  |                                      |                                       |                                 |
| NORDICS REGION<br>REA: Rachid Lachen                       |                          |                                  |                                    |                                | EAST REGION<br>REAs: Viki Gajdos & Andrzej Bugowski |                                 |                                    |  |                                      |                                       |                                 |
| Denmark  | Norway                   | Nordic<br>Warehouse              | Finland                            | Sweden                         | SEE   REA: Viki Gajdos                              |                                 |                                    | TK, RO, CZ, PL   REA: Andrzej Bugowski |                                      |                                       |                                 |
| Helle Astrup<br>Aalborg                                    | Vigdis Martinsen<br>Oslo | Rachid Lachen<br>Jerdene         | Olli Huuskonen<br>Espoo            | Ann Schiberg<br>Stockholm      | Serbia  | Bulgaria<br>Viki Gajdos         | Croatia                            | Slovakia                               | Turkey                               | Romania                               | CZ Republic                     |
| Michael Bissak<br>Birkeland                                | Madha Syed<br>Oslo       |                                  | Pia Järvenpää<br>Espoo             | Elizabeth Tylen<br>Stockholm   | Margana Stankovic<br>Belgrade                       | Slovenia<br>Viki Gajdos         | Sergiu Lasc<br>Rijeka              | Igor Cucor<br>Bratislava               | Ozer Ahmet Olgun<br>Istanbul         | Radu Dima<br>Bucharest                | Frantisek<br>Pechacek<br>Prague |
| Camilla Munksgaard<br>Birkeland                            |                          |                                  | Sybil Dagas<br>Lund, Stockholm     |                                |   | Hungary<br>Viki Gajdos          |                                    |  | Ece Kucukoguzcu<br>Istanbul          |                                       | Pavil Holak<br>Prague           |
|  |                          |                                  |                                    |                                |   | Strik Gregory<br>Budapest       |                                    |  |                                      |                                       | Jana Suchankova<br>Brno         |
|  |                          |                                  |                                    |                                |   |                                 |                                    |  |                                      |                                       | Irena Pangracova<br>Prague      |
|  |                          |                                  |                                    |                                |   |                                 |                                    |  |                                      |                                       | Dmytro Fitsek<br>Brno           |

EUROPE

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David Vetter, Chief Legal Officer

Jean-Paul Durand, CVP, Chief Ethics and Compliance Officer

"AP" Ana-Paolo Capaldo, Director, Ethics & Compliance, Americas

| MEXICO & LAC REA:<br>Paulina Salaza Guadalajara |                   | Latin America REA: Jessica Velez<br>Miami |                 |                        | EAST COAST REA:<br>Tim Ayer |                        | Logistics Centers REA:<br>Bradley Shepherd |                      | WEST COAST & VIRTUAL<br>REA: OPEN |                   | Canada<br>REA: Ana Stranaghan<br>Mississauga |                |
|---|-------------------|---|-----------------|------------------------|-----------------------------|------------------------|--|----------------------|-----------------------------------|-------------------|--|----------------|
| Mexico  | Chile             | Costa Rica                                |                 | Miami/<br>LA HQ A1     | Clearwater                  |                        | A2<br>Suwanee                              | A3<br>Swedesboro     | Tempe                             | Broomfield        | Mississauga                                  | Ottawa         |
| Paola Lazzano<br>Insurgentes                    | Joel Herrera      | Rebeca<br>Rodriguez                       | Daniel Quesada  | Maria Lucia<br>Sanchez | OPEN                        | Tony Leonarduzzi       | Amada Castro                               | Kathy Hayes          | Wally Campbell                    | Michelle Garmon   | OPEN   | Kerrie Redmond |
| Karla Kim<br>Insurgentes                        | Aligandro Sicilia | Zeydi Quesada                             | Alexia Martinez | Briana Figueiras       | Robert Alexander            | Bobbi Matthews         | Phil Eaddy                                 | Tracey Kirk          | Noelle Bolduc                     | Chad Forsythe     | Swaleha Kulkarni                             | Toronto        |
| Luis Uribe<br>Guadalajara                       | Argentina         | Ecuador                                   | Brazil          | Caleb Tabio            | John Price                  | Dagnara<br>Andrzejczyn | Mary Catus                                 | A5<br>Forth Worth    | Donald Skinner                    | Amelia Bush       | Fany Weeks                                   | Jeremy Noonan  |
| Julio Gomez<br>Guadalajara                      | Mauro Klainer     | Agustin Garcia                            | Nilma Santos    | Armando<br>Palumbo     | Jennifer Forte              | Gwen Phillips          | A4<br>South Bend                           | Bob Leeming          | Duluth                            | Bruce Rosol       | Vancouver                                    |                |
| Lucero Arellano<br>Guadalajara                  | Peru              | Maria Estrella                            | Ana Vilela      | Colombia               | Cheryl Ganes-Schaaf         | Amy Pierce             | Shanelle Wales                             | Marcella Garcia      | Kathy Bobar                       | San Antonio       | Jesse Dosangh                                |                |
|   | Aligandro Sicilia |   |                 | Andres Zuniga          | Brad Greene                 | AJ Rodriguez           | Brian Perry                                | Bloomington          | LaTangela Page                    | Amelinda Davila   | Steve Ganske                                 |                |
|   |                   |   |                 | Johanna Molina         | John Hughes                 | Casey Swanson          | Justin Pierce                              | OPEN                 | Nancy Thelling                    | Melissa Smith     |  |                |
|   |                   |   |                 |                        | Jim Hus                     | Norma Santiago         | Groveport                                  | A6 Fontana           | Tyson Benton                      | Groveport         |  |                |
|   |                   |   |                 |                        | EJ Moon                     | OPEN                   | Elizabeth Craft                            | Gabriel Lopez        | Amanda Jarrett                    | Cynthia Hendricks |  |                |
|   |                   |   |                 |                        |                             |                        | Chandler                                   | Leoveldina<br>Garcia | Pittsburgh                        | Jarrod Weeks      |  |                |
|   |                   |   |                 |                        |                             |                        | Spyros Pappas                              |                      | Jen Whoolery                      | Debra Baughman    |  |                |
|   |                   |   |                 |                        |                             |                        |  |                      | Raleigh                           |                   |  |                |
|   |                   |   |                 |                        |                             |                        |  |                      | Dan Smith                         |                   |  |                |

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## AMERICAS



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|--|-------------------------|-----------------------------|------------------------------|--|--|-----------------------------|------------------------------|
| David Vetter, Chief Legal Officer                          |                         |                             |                              |  |  |                             |                              |
| Jean-Paul Durand, CVP, Chief Ethics and Compliance Officer |                         |                             |                              |  |  |                             |                              |
| Archana Shastri, Director, Ethics & Compliance, APAC       |                         |                             |                              |  |  |                             |                              |
| China, Hong Kong, Macau<br>Teresa Cheung (HK)              | Singapore               | Vietnam<br>REA – Julie Chia | Thailand<br>REA – Julie Chia | India REA – Husain<br>Dewaswala (Mumbai) | Australia REA – Abrar<br>Syed (Sydney) | Malaysia<br>REA – Susan Lim | Indonesia<br>REA – Susan Lim |
| Ken Yu (Shenzhen)  | Julie Chia REA – TH, VN | Tran Kim Ngoc               | OPEN                         | Ashish Ray (Delhi)                       | Kara Zeng (Melbourne)                  | Dorson Yong                 | Lidya Santoso                |
| Amanda Qian (Shanghai)                                     | Susan Lim REA – ID, MY  |                             |                              | Chandana Mishra (Mumbai)                 | Patricia Coleman (Sydney)              |                             |                              |
|  |                         |                             |                              | Nitin Tripathi (Bangalore)               |  |                             |                              |

## APAC



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# Tech Data Speak Up Training



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## Speak Up Session | Rules of Discussion

- ▶ Be open and honest with your feedback – it is important & anonymous.
- ▶ There will be no reporting of who provided feedback.
- ▶ Your attendance will NOT be tracked.
- ▶ All questions and comments are welcome!
- ▶ No laptops or phones please.
- ▶ Today's discussions and responses are completely **confidential**.



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## Speak Up Session | Why was I selected?

- ▶ Attendees are selected randomly.
- ▶ We requested your RSVP to ensure sufficient headcount for discussion and feedback.
- ▶ You may be invited again, since we do not have a record of who attended a Speak Up Session.



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## Why is this session important?

- ▶ At the forefront of every company should be an **ethical** and **compliant** mindset.
- ▶ Our partners (such as our vendors, customers and shareholders) expect Tech Data to be **ethical** and **compliant** by having a **strong culture of integrity** resulting in higher employee, customer and vendor satisfaction ratings, generating repeat business, positive financial results and a return on shareholders' investment.
- ▶ Violations of compliance-related laws can have serious consequences for the company and for you as an individual.
- ▶ **Speaking up** helps create an ethical culture in the workplace and a positive work environment for all.



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## Our Goal

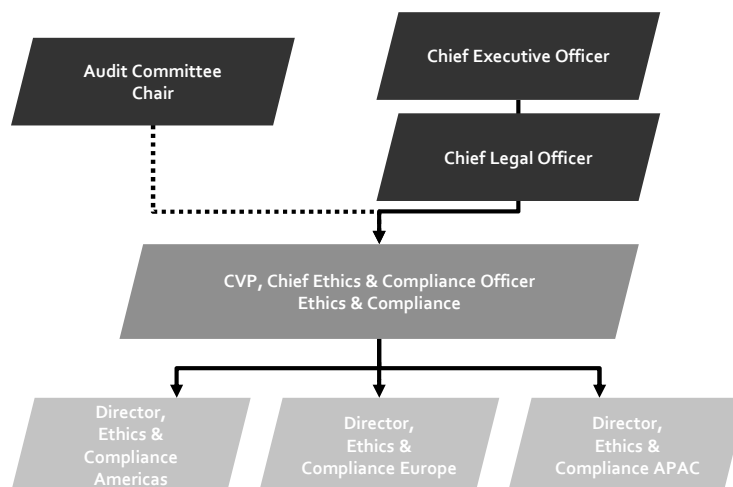
- ▶ **Protect** both the **company** and our **colleagues** from **risks** by ensuring that we are aligned with both **external and internal policies & regulations**.
- ▶ Promote a culture that encourages Tech Data colleagues to take responsibility for **always doing the right thing**.
- ▶ Help you **grow the business in a compliant way**.



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## Tech Data's Approach



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## Today's Objectives

- ▶ Review and discuss your perceptions of Tech Data's culture.
- ▶ Discuss the importance of speaking up if you see or suspect misconduct in the workplace.
- ▶ Learn more about important Tech Data policies and procedures.
- ▶ Your feedback helps us identify cultural trends that allow for us to continuously strengthen Tech Data's compliance culture.

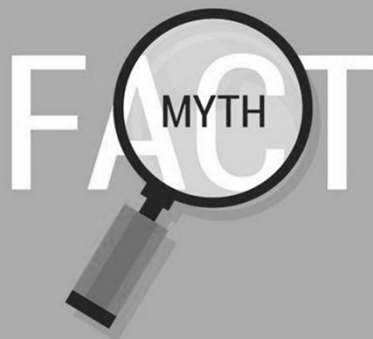


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## Compliance Myths Debunked

Let's debunk some common compliance "myths".  
For each of the following statements, determine whether it is true or false!



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## True or False...

Once the review is complete, management receives a copy of the final investigative report.

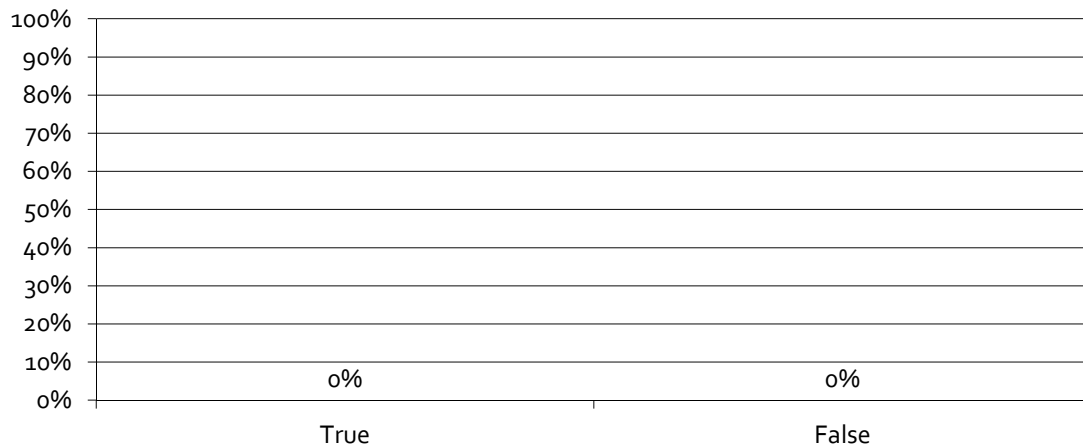
1. True
2. False

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Once the review is complete, management receives a copy of the final investigative report.



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## True or False...

**My future employer will be notified of any reports that I was a part of while employed at Tech Data.**

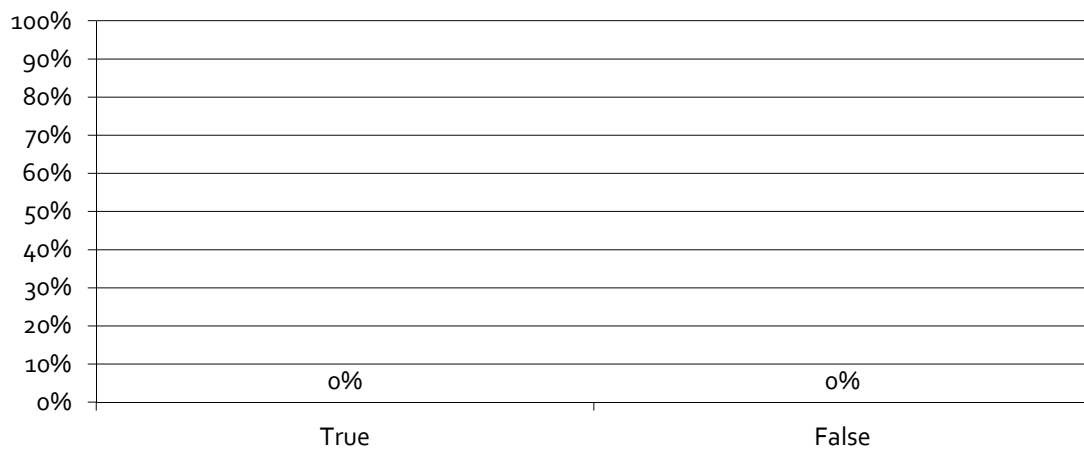
1. True
2. False



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**My future employer will be notified of any reports that I was a part of while employed at Tech Data.**



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## True or False...

Once a concern is filed with E&C, the reporter will never hear back.

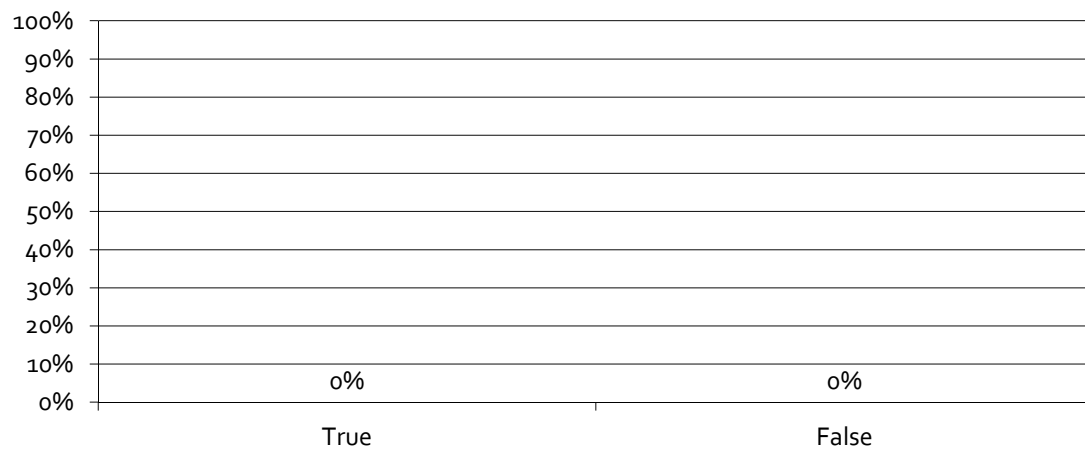
1. True
2. False

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Once a concern is filed with E&C, the reporter will never hear back.



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## E&C Report Lifecycle

1. Initial response sent to reporter acknowledging receipt of concern / allegations / guidance request
2. Identify a lead investigator (i.e., HR vs E&C)
3. Develop a case plan
4. Investigate
5. Write a final investigative report / memo / summary
6. Brief management (as appropriate) for determination of action to be taken, where relevant
7. (If applicable) Execute and document any necessary actions to be taken
8. Send final response to reporter
9. Document all of the above in our system of record

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### Question 1

I know where to report misconduct in the workplace.

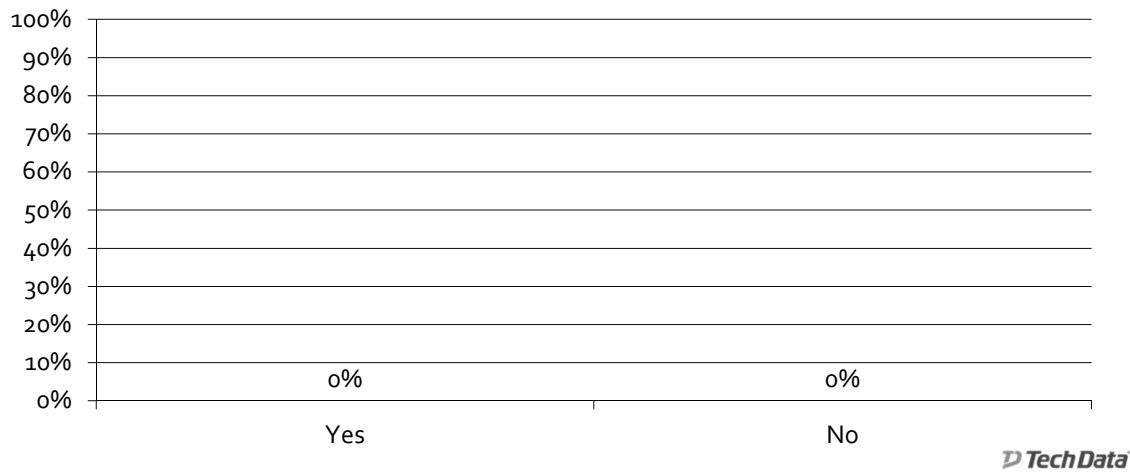
1. Yes
2. No

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### I know where to report misconduct in the workplace.



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### Question 2

**Which, if any, of the following would likely prevent you from reporting a concern?**

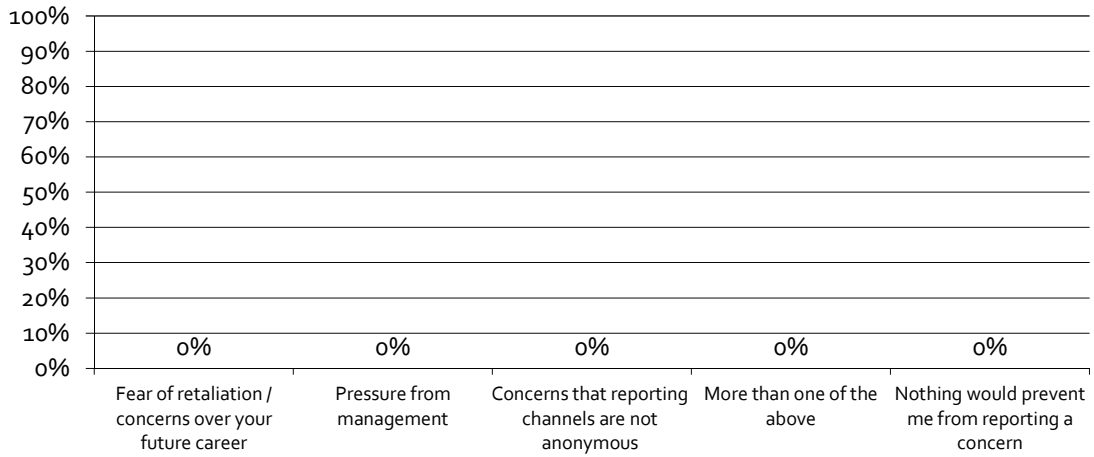
1. Fear of retaliation / concerns over your future career
2. Pressure from management
3. Concerns that reporting channels are not anonymous
4. More than one of the above
5. Nothing would prevent me from reporting a concern

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Which, if any, of the following would likely prevent you from reporting a concern?



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### Question 3

I believe I can report ethics issues without fear of retaliation.

1. Yes
2. No

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**I believe I can report ethics issues without fear of retaliation.**



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## Question 4 | Scenario

A few months ago, something uncomfortable happened at work with my boss so I reported it through the ethics hotline. After submitting my concern everything was fine but now I am noticing that staff meetings are really weird and I am no longer included in our Friday team lunch.

**Is this retaliation?**

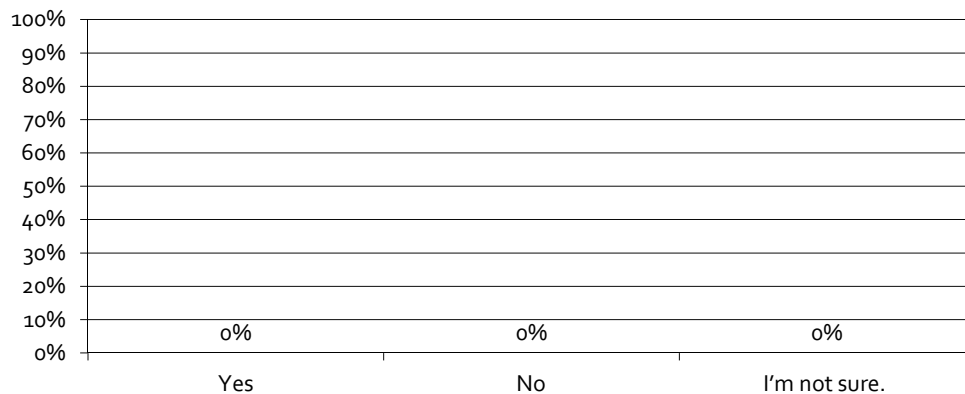
1. Yes
2. No
3. I'm not sure.

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A few months ago, something uncomfortable happened at work with my boss so I reported it through the ethics hotline. After submitting my concern everything was fine but now I am noticing that staff meetings are really weird and I am no longer included in our Friday team lunch.

**Is this retaliation?**



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## Question 5 | Scenario

I'm in a group of 3 people. My team lead is always stressed out, yelling and swearing....telling me I can't take a lunch break because we are so busy; making me stay late but telling me to clock out at my normal time. I can't keep up this pace especially since I am not getting paid for my overtime and bad language is not appropriate in the office. The problem is, if I report the team lead she'll know it was me and things could get worse. Or, she could get fired and then all of her work will be dumped on me.

**What should I do?**

1. Report it and hope for the best.
2. Don't report it and just look for another job.
3. Talk to your teammates and try to figure out why your boss is so stressed out.
4. Report it and also express your concerns about possible retaliation.

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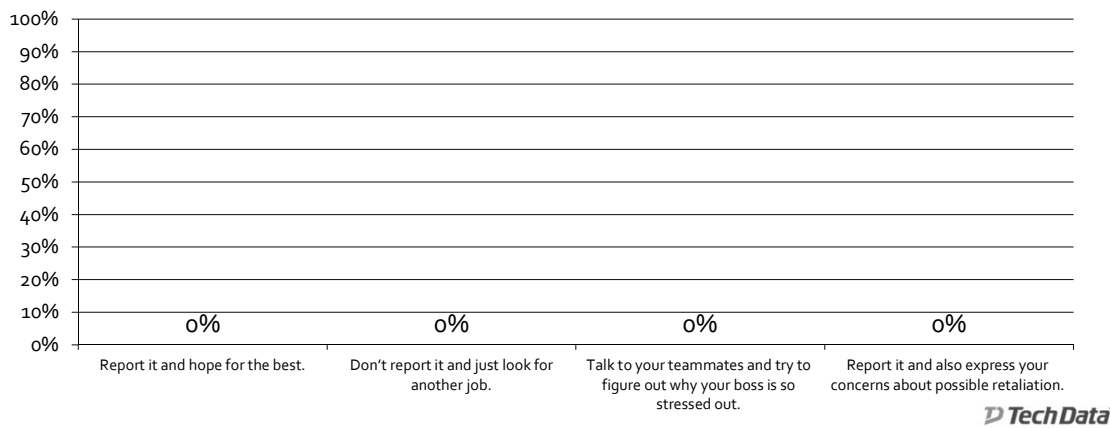
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I'm in a group of 3 people. My team lead is always stressed out, yelling and swearing ....telling me I can't take a lunch break because we are so busy. Making me stay late but telling me to clock out at my normal time. We are all really busy, but I can't keep up this pace. I am not getting paid for my overtime and bad language isn't appropriate in the office. The problem is, if I report the team lead she'll know it was me and things could get worse. Or, she could get fired and then all of her work will be dumped on me.

What should I do?



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## Question 6

During the last 12 months, my manager has spoken to me about the importance of speaking up when I have questions or concerns.

1. Yes
2. No

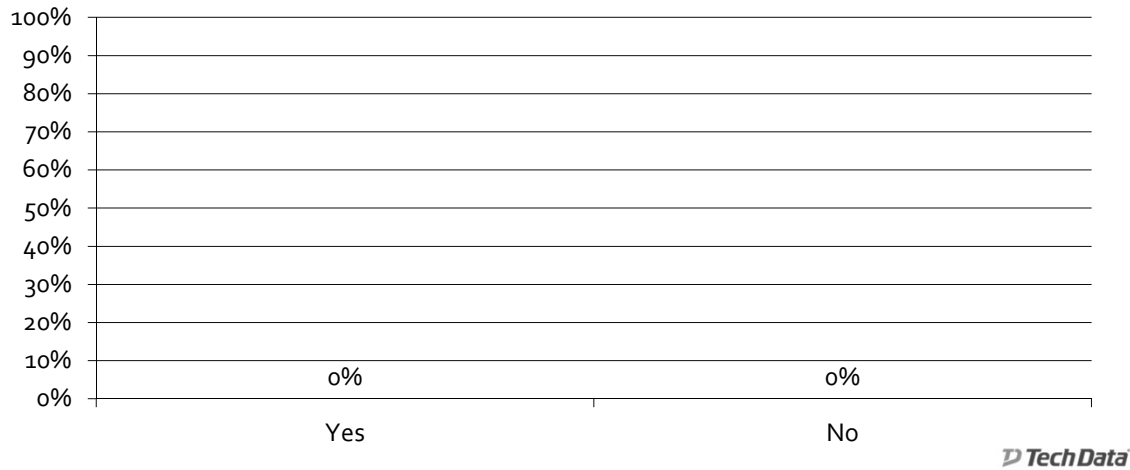


"What if, and I know this sounds kooky, we communicated with the employees."

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**During the last 12 months, my manager has spoken to me about the importance of speaking up when I have questions or concerns.**



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## Question 7

**Are you comfortable with asking for guidance about issues related to Ethics and Compliance?**

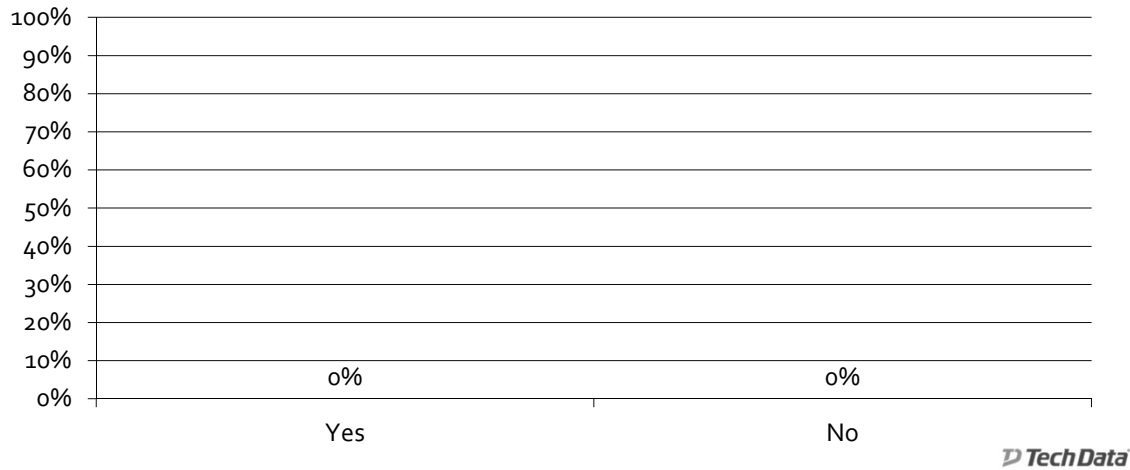
1. Yes
2. No

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## Are you comfortable with asking for guidance about issues related to Ethics and Compliance?



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Concerned something may be unethical, illegal or violate our Code of Conduct?  
**You have many options to speak up.**

# Speak Up. We'll Listen.



### Talk

to your manager, an ethics advisor, human resources, the ethics and compliance department or the legal department



### Call

one of the local numbers found on [TechDataEthicsLine.com](http://TechDataEthicsLine.com)



### Connect

via [TechDataEthicsLine.com](http://TechDataEthicsLine.com) or email [EthicsandCompliance@techdata.com](mailto:EthicsandCompliance@techdata.com)

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## Shared responsibility

We ALL play a CRITICAL role in Speaking Up



Colleagues who are advocates and ambassadors are key to driving our success by promoting an ethical and compliant workplace in which colleagues feel comfortable with speaking up and seeking guidance.

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## Question 8

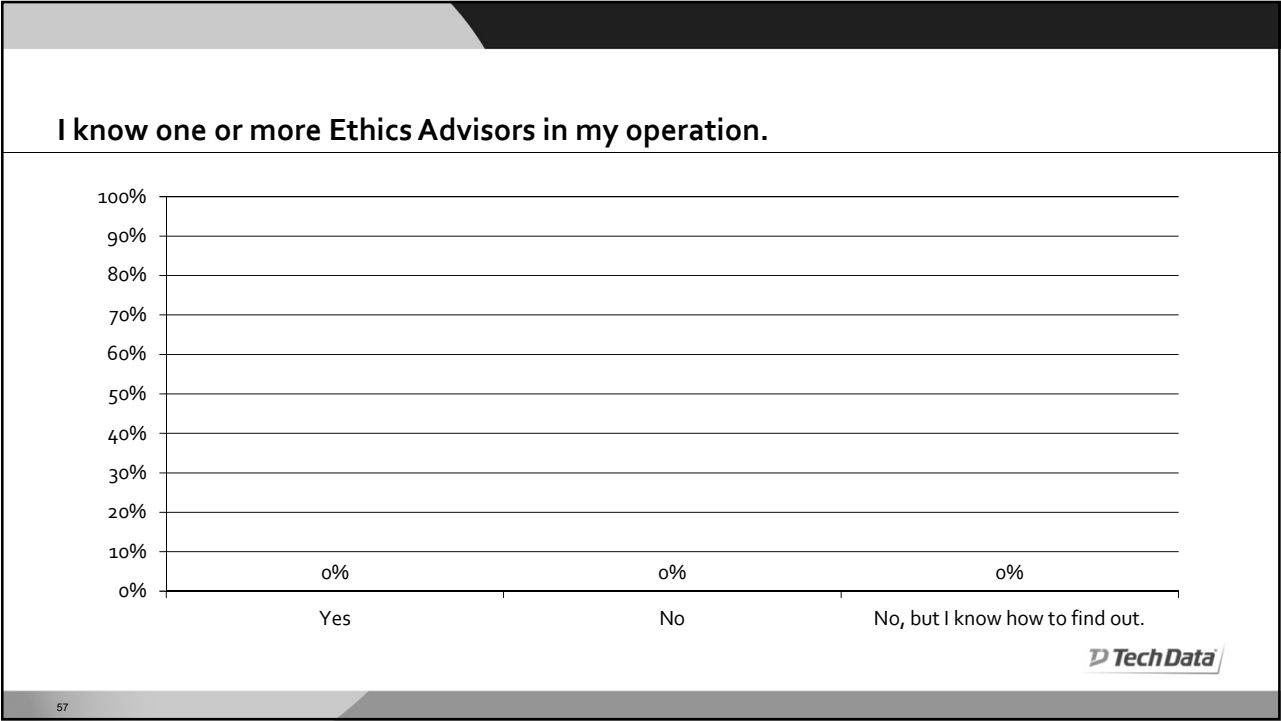
I know one or more Ethics Advisors in my operation.

1. Yes
2. No
3. No, but I know how to find out.

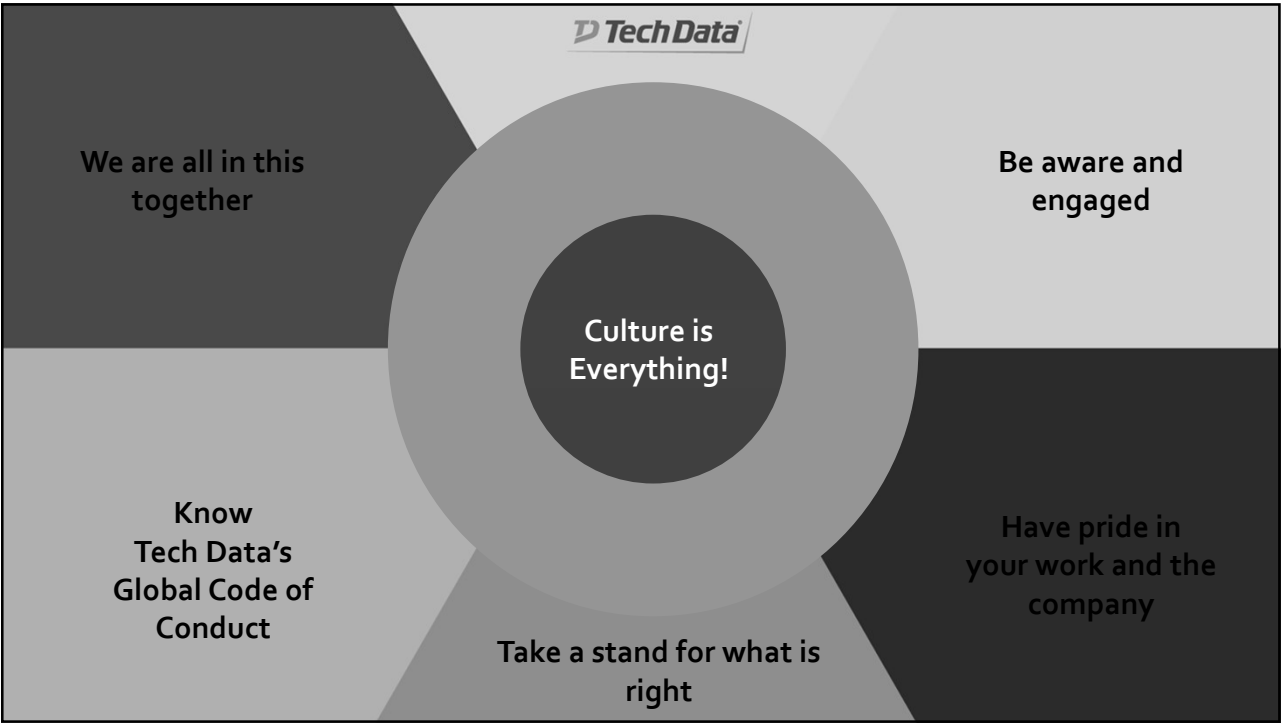
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## Results - Focus Areas

### Three main questions:

- ▶ **I know where to report misconduct in the workplace**
  - Answers: Yes, No
- ▶ **I believe I can report ethics issues without fear of retaliation**
  - Answers: Yes, No (in Americas only) Yes, No
- ▶ **Are you comfortable with asking for guidance about issues related to Ethics and Compliance?**
  - Answers: Yes, No

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## Results - Conclusions

### General conclusions

- ▶ Results Americas/Europe surprisingly comparable
- ▶ In Europe: clear north-south difference
- ▶ Outcome of sessions more or less in line with Ethics Reports
  - In countries where employees indicate a higher fear of retaliation we receive more anonymous reports and less reports in general
- ▶ In some locations reporting options, including the Ethics Advisors are not well-known
- ▶ Employees are seeing things that they are not reporting

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## After the sessions

- ▶ Present the results to local management after the sessions and point out the pain points
  - Management reaction
- ▶ Benchmark country by country



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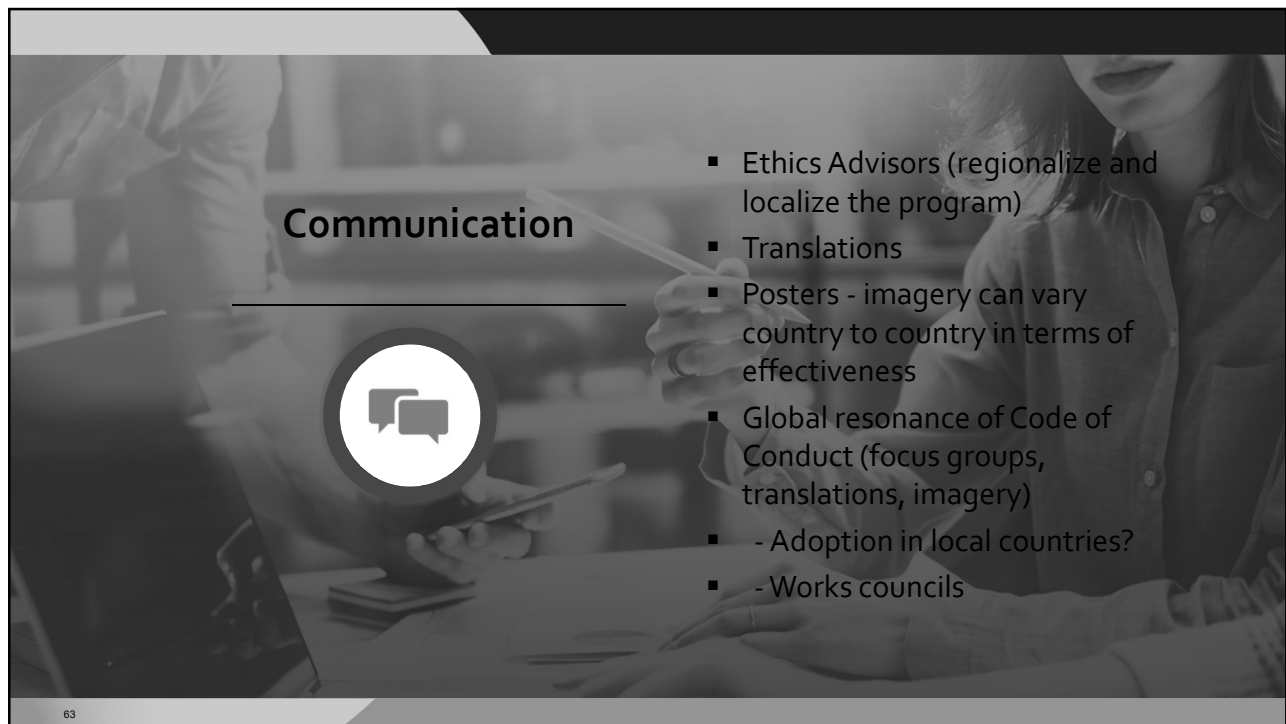
## Next Steps

- ▶ Repeat the process Y/Y to compare the results
  - Measure improvement
  - Integrate with other data points such as Employee Engagement Survey
- ▶ Urge management to focus more on Ethics and Compliance
- ▶ Require management to cascade the Speak Up message down their organizations
  - Check by pulling random employees of the work floor and by talking to the Ethics Advisors
- ▶ Need to ensure management/HR are not blackholes




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## Communication

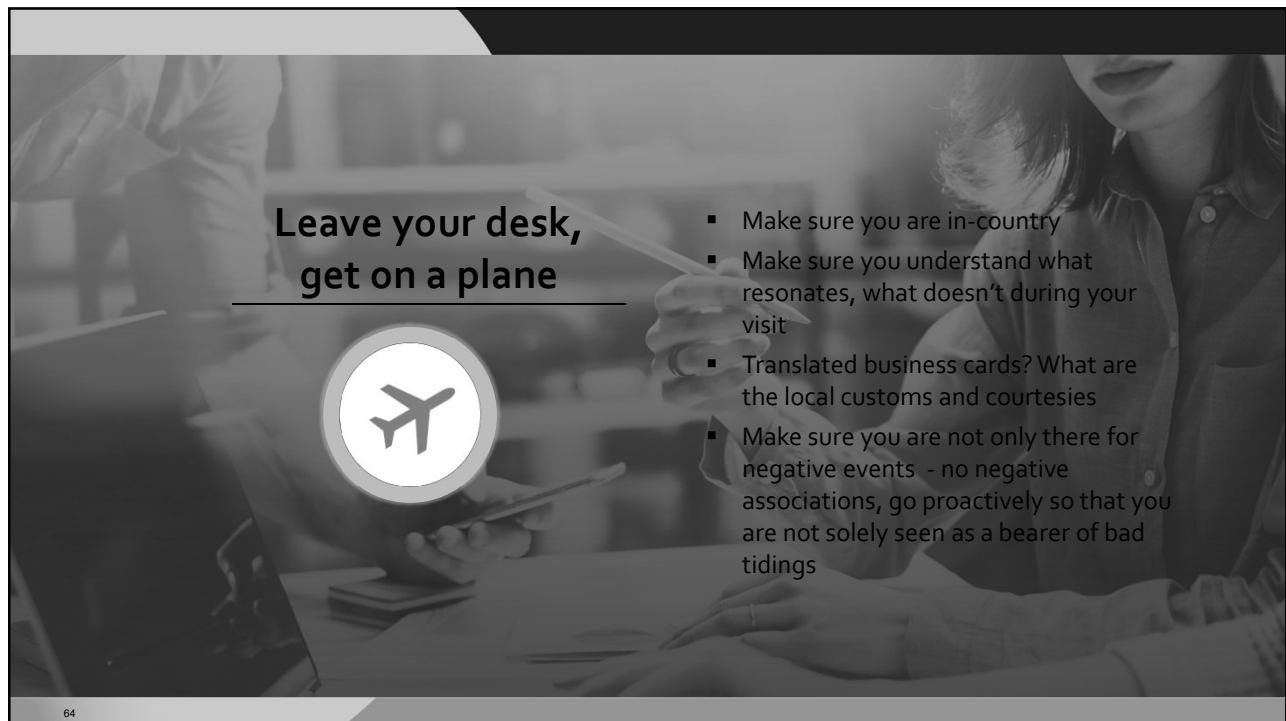
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- Ethics Advisors (regionalize and localize the program)
- Translations
- Posters - imagery can vary country to country in terms of effectiveness
- Global resonance of Code of Conduct (focus groups, translations, imagery)
  - - Adoption in local countries?
  - - Works councils


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## Leave your desk, get on a plane

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- Make sure you are in-country
- Make sure you understand what resonates, what doesn't during your visit
- Translated business cards? What are the local customs and courtesies
- Make sure you are not only there for negative events - no negative associations, go proactively so that you are not solely seen as a bearer of bad tidings

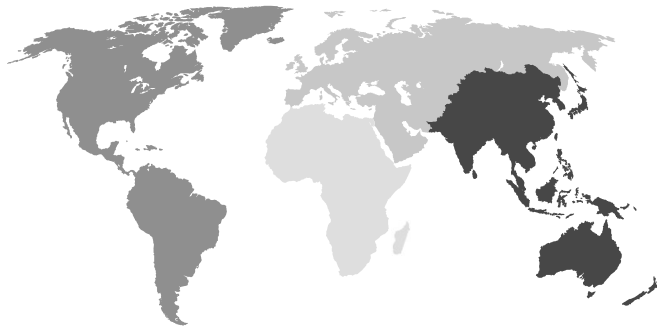
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## How do I learn the art of resonating?

1. Research
2. Idiosyncrasies



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## Idiosyncrasies Europe



- ✓ Originally - People really saw E&C as an American import/corporate function
- ✓ Communication / delivery style - some countries more direct
- ✓ Italy - use local lawyer, but be present to answer questions and to build relationships and visibility; bringing food/refreshment (this might not work in Germany, for example)
- ✓ Think about who is sending the message - does it come from the country manager? Corporate? What has better receptiveness
- ✓ Political climate; Post-war; influence of historical on current culture/climate and attitudes towards Americans, reporting, etc.
- ✓ "Code of Ethics" vs. "Code of Conduct"

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## Idiosyncrasies Americas



- ✓ Face-to-face contact, the art of the relationship
- ✓ Greetings (customs)
- ✓ Geopolitical realities (HISTORY)
- ✓ The importance of words & terms (cohecho, soplon, whistleblower; coima) - making sure training is not striking the wrong tone
- ✓ Level of Formality
- ✓ Attitudes towards corruption / shifts in outlook in BRIC / emerging markets - values shifts
- ✓ Compliance Cafecito

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## Idiosyncrasies APAC

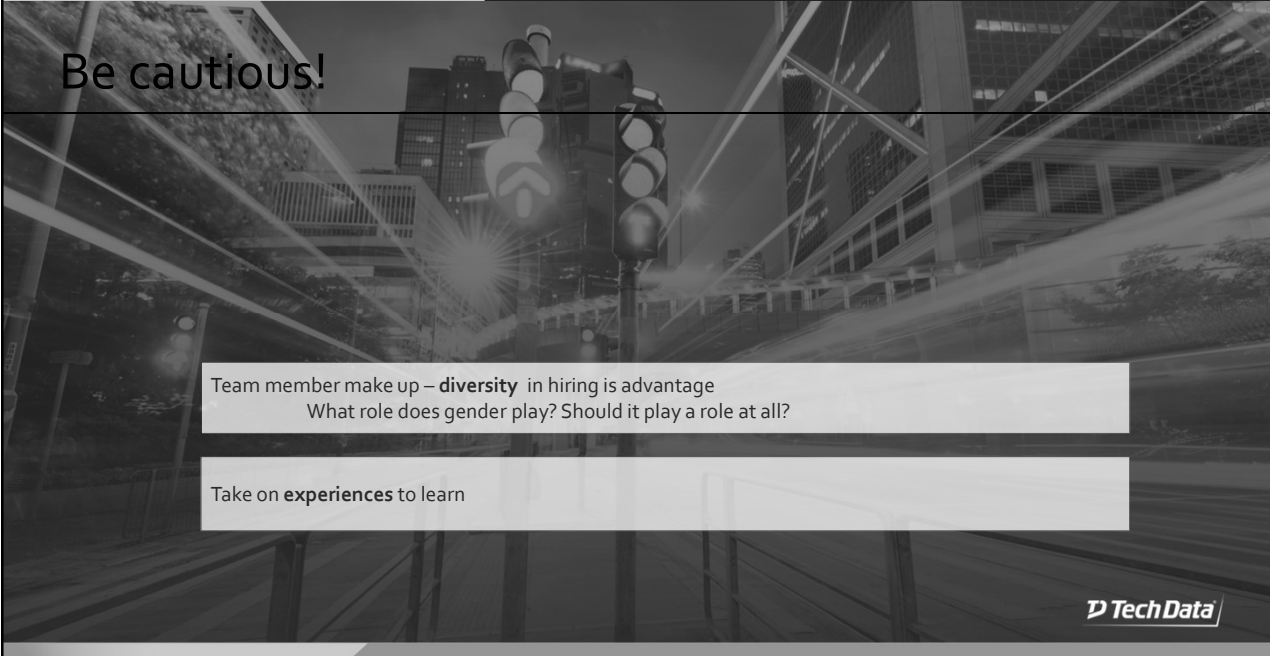


- ✓ Clothing
- ✓ Dinners & hospitality
- ✓ Malaysia - local laws, makeup of the country, translation requirements, quotas

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# Be cautious!

Team member make up – **diversity** in hiring is advantage  
What role does gender play? Should it play a role at all?

Take on **experiences** to learn

**Tech Data**

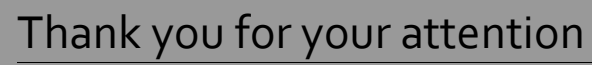
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# Questions?

**Tech Data**

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A large, stylized white graphic on the left side of the slide, resembling a thick, curved arrow or a stylized letter 'F'. The background is a dark gray with a black curved shape in the top right corner.

Thank you for your attention