



Global Compliance™ acquired Brightline Compliance™ in May 2007. Led by former U.S. Department of Justice attorneys, Brightline Compliance has provided online and instructor-led training on ethics and compliance topics to more than one million employees in greater than 500 organizations, including dozens of Fortune 500 corporations.

Who Should Take This Course?

- All employees

From the Headlines

"Section 8B2.1(b)(4) makes compliance and ethics training a requirement."

— Commentary, 2004
Federal Sentencing
Guidelines

An effective compliance and ethics program can reduce fines by up to 95 percent.

— U.S. Sentencing
Commission



Why Train on This Topic?

The Law Requires Training

The amended Federal Sentencing Guidelines:

- Emphasize that simply distributing a written compliance and ethics policy to employees is not legally sufficient
- Make periodic compliance and ethics training a *requirement* for all employees

Effective Training Delivers Return on Investment

An effective training program can greatly reduce the costs of ethical and legal violations. Consider the following:

- One-third of employees report witnessing unethical conduct in the workplace, according to a study by the Ethics Resource Center.
- Negative publicity from unethical corporate behavior has been shown to lower stock prices for a minimum of six months, according to a study by the University of Southwestern Louisiana.



Risk Assessment

Compliance and ethics training is not a “one-size-fits-all” solution. Global Compliance will ensure that your workplace ethics training is customized to the needs of each individual employee. First, Global Compliance’s subject matter and legal experts will create a risk analysis of your training needs. Specifically, they will examine your Code of Conduct and other relevant policies and look at factors such as your industry, geography of operation, and the job functions of your employees. Global Compliance will then provide you an analysis of the topics on which you should train employees.

Course Overview

Most employees do not knowingly violate a law or policy. Instead, many ethical violations occur when an employee is faced with a difficult choice that requires the employee to balance competing interests where the right choice is not clear. Instead of simply preaching to employees the importance of ethical behavior, effective training uses interactive audio-visual scenarios to address the “gray areas” and provides employees practical skills for identifying and resolving these ethical dilemmas.

Course Content

After the risk assessment is complete, Global Compliance will recommend which training modules should be provided to each type of employee. Our continually expanding library of course modules includes:

- Antitrust
- Confidential Information

Policy Receipt and Certification

Global Compliance's training can require employees to electronically acknowledge that they have received your organization's Code of Conduct or similar document and certify that they are aware of any possible violations.

Customization

You may customize the course to include:

- An audio-visual introduction from a high-ranking official welcoming employees to the course
- Instruction on your specific policies on each topic
- Scenarios that are specific to your organization's needs

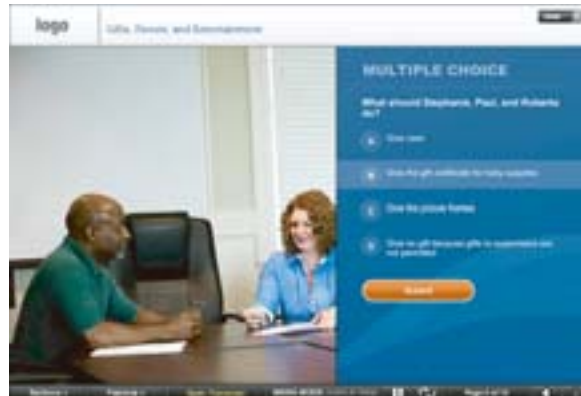
To Learn More

Contact us to view a demo or learn more about this course.



Course Content (continued)

- Conflicts of Interest
- Environment, Health, and Safety
- Equal Employment Opportunity (EEO)
- Ethical Leadership for Supervisors
- Export Controls and Anti-Boycotting Laws
- Fair Dealings
- Financial Integrity
- Foreign Corrupt Practices Act (FCPA)
- Fraud and Abuse
- Gifts and Favors
- Government Procurement
- Insider Trading
- Intellectual Property
- Outside Opportunities
- Record Management and Retention
- Reporting Ethical Concerns
- Sarbanes-Oxley Act
- Technology (Email and Internet Use)
- Use of Organization Property for Personal Use



e-CounselorSM

Global Compliance's e-Counselor is a decision tree that your employees can use at any time to guide them through workplace ethical dilemmas. The e-Counselor is custom built to an organization's specific policies.

Crack the CodeSM

In the Crack the Code exercise, employees must search for the answers to specific questions within your Code. For example, up to what monetary value can a vendor gift be accepted? What telephone number should an employee call to make an accounting fraud complaint? In this exercise, employees become familiar with your Code of Conduct and how to use it to look up questions.

Languages

Global Compliance can deliver its modules in numerous languages and ensure that the course content is localized.

Anonymous Q & A Feature

Global Compliance's courses allow employees to submit questions, even anonymously, and have those questions answered online.

New Refresher Courses Provided Each Year

Global Compliance provides its clients new refresher courses each year. The refresher courses address any changes in the law and new ethical dilemmas that your organization or industry may face.