

A background image of a modern meeting room with large windows. A woman with glasses is standing and presenting to a group of people seated around a table. The scene is dimly lit, with light coming from the windows and overhead lamps.

# Untangling the Disclosure Process: Best Practices and a New Approach

September 10, 2020



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## Today we'll cover:

- Disclosure Basics
- Avoiding the Disclosure “GAP”
- Automating Disclosures
- Disclosure Best Practices
- Demo of informed360 Dynamic Disclosures
- Questions
- Final Thoughts

# Basics: What Needs to be Disclosed?

## Disclosure Types

- Conflicts of Interest (Actual/Perceived/Potential)
  - Employee
  - Customers
  - Suppliers/Vendors
  - Outside Employment
- Gifts and Entertainment (Business Courtesies)
  - Giving
  - Receiving
- Charitable Donations
- Political Contributions
- Government Contacts
- Trade/Industry Associations

# Basics – Importance of Disclosures

- **Reinforces Compliance** with Policies and Procedures
- **Protects Employees** and the Business
- **Supports Risk Identification** and Remediation
- **Delivers a Documented Process**
- **Reinforces Speak-up Culture** and Ethical Behavior
- **Provides Meaningful Insights** into Business Activities
- **Helps prevent large penalties, fees and reputational damage**

# Disclosures: An Evolution

## Progression of Disclosures

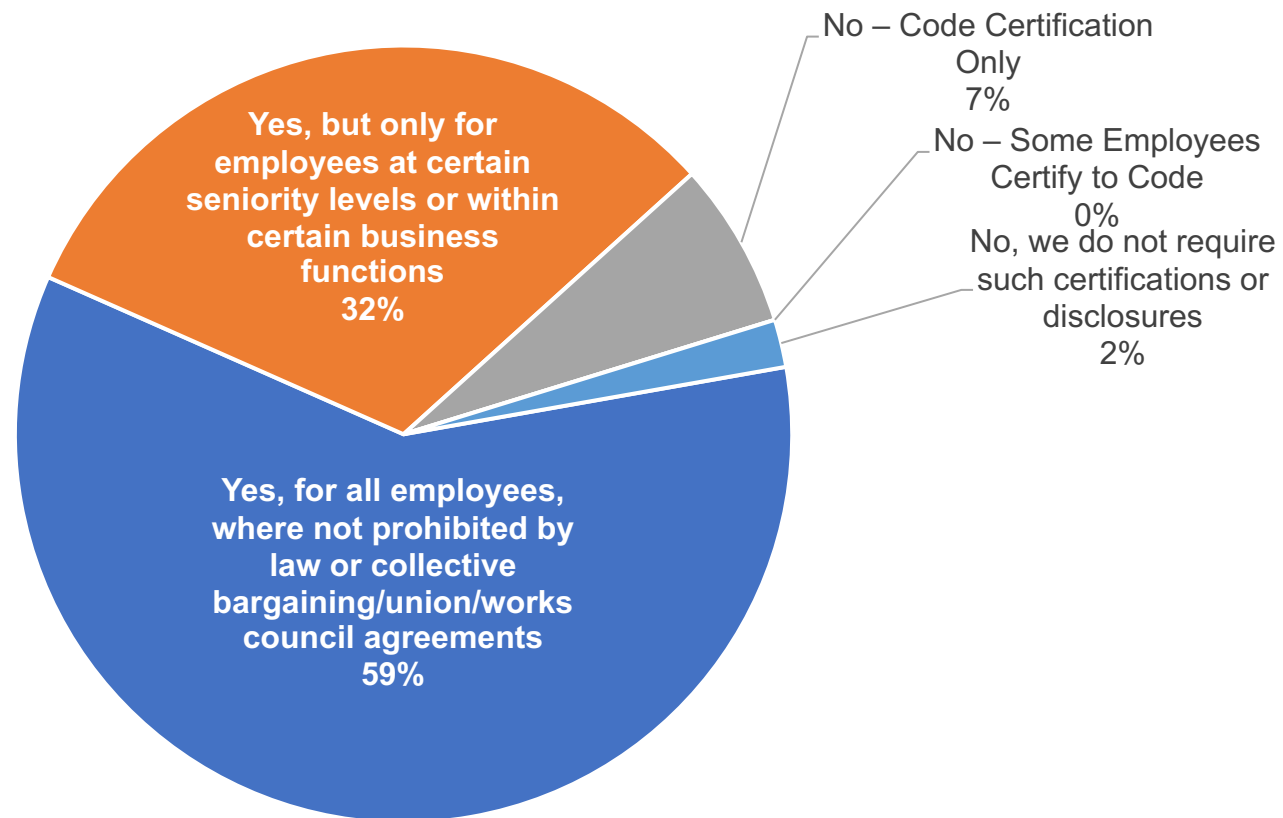
- Informal “Let us know”
- Siloed disparate often manual Systems
- Consistent, centralized system

# Conflict of Interest Disclosures



Q4B.5 - Does your company require conflict of interest certifications and/or disclosures (separate from a Code of Conduct acknowledgement) from employees?

*number responding = 132*



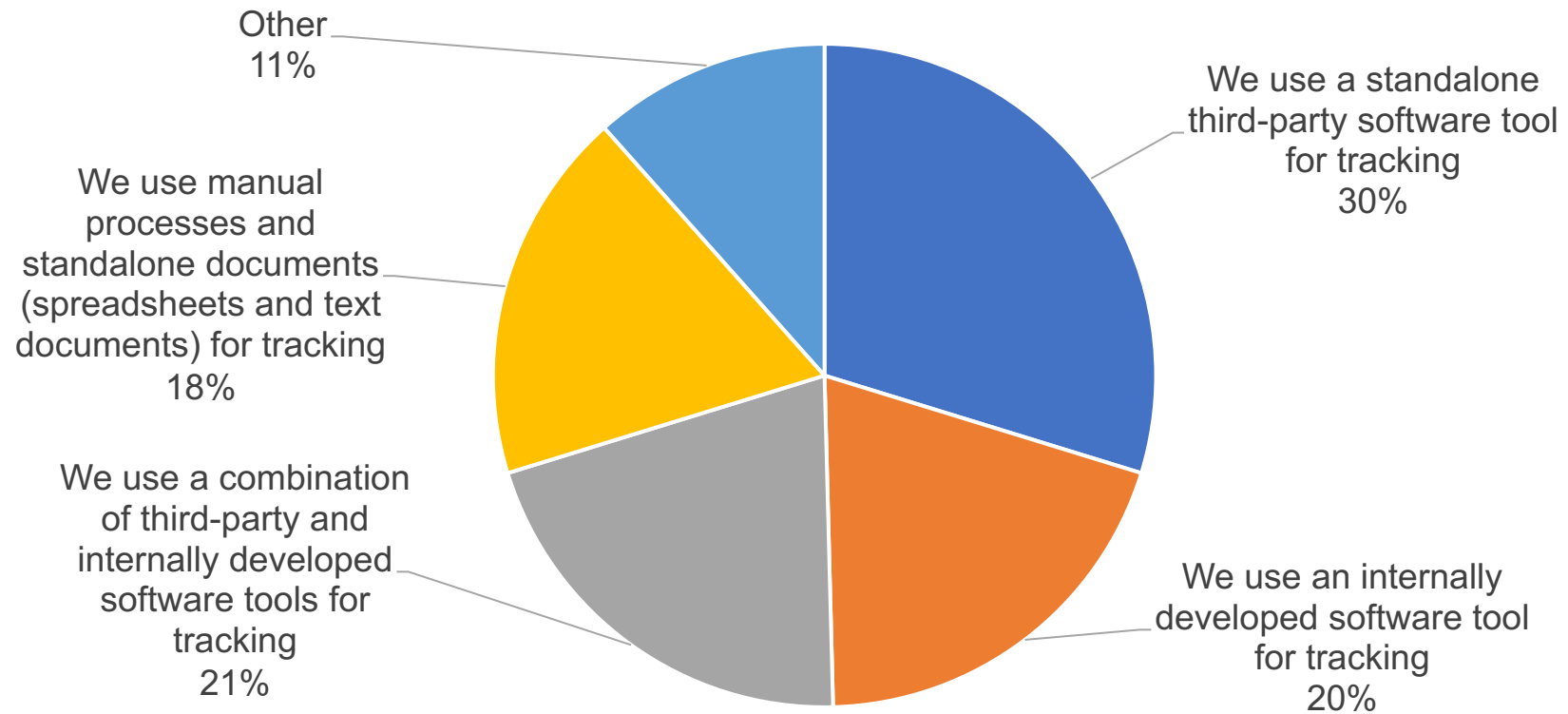
*92% of 2020 WME Honorees require some or all employees to provide conflict of interest certifications or disclosures*

# Technology: COI Tracking



Q4B.8 - What technology does your company use to track conflicts of interest certifications and/or disclosures?

number responding = 121



# COI Disclosures



Q4B.7 - How frequently does your company require these conflicts of interest certifications and/or disclosures?

Please select all that apply.

number responding = 130

Prior to closing any significant transaction, deal, or agreement

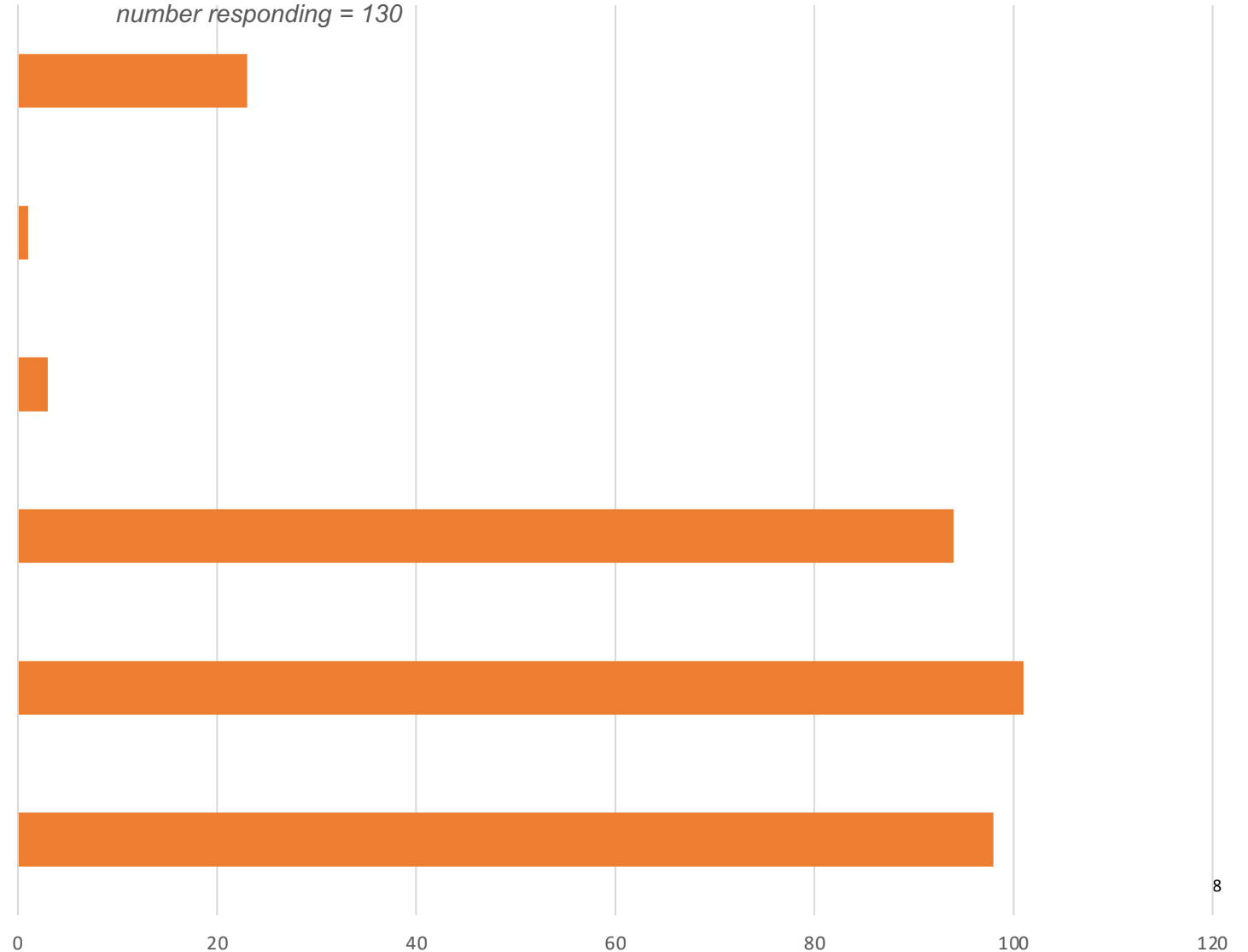
Every three years

Every two years

On as-needed basis

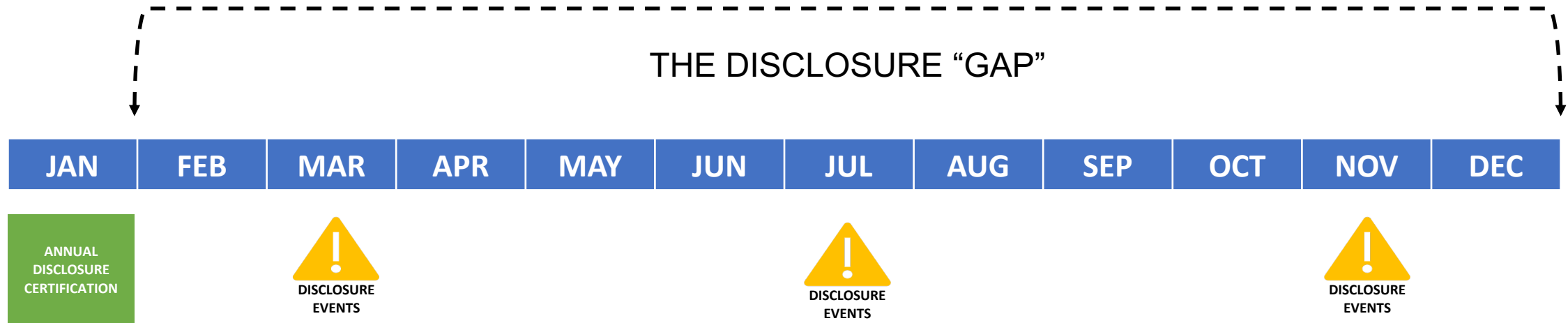
Annually

Upon joining the company





# Disclosure Frequency



## Conflicts of Interest -- Close the "Gap"

- New Employee Certification and Disclosure
- Ad Hoc Disclosures as Conflicts Arise
- Annual Certification and Disclosure
- M&A Due Diligence

## Gift & Entertainment, Political Contributions, Charitable Donations

- Prior Approval
- Immediately After
- New Customer Acquisition
- Election Year

# Disclosures Best Practices

- Tie the disclosure process to the underlying business activity
- Make the disclosure process easy to access and complete
  - Automate the process and workflow/approvals
  - Avoid the temptation to ask 100 questions
- Communicate with the employee
  - Keep the workflow/approval process transparent
  - Train employees on conflicts of interest and other disclosures
- Track remedial measures and controls related to disclosures

# Automating Disclosures

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## Why Automation?

- Drive Employee Engagement
- Improve Productivity
- Faster Turnaround
- Documented Defensible Process
- Better Data and Analytics
- Optimize Resources

## Why now?

- Low Activity
- Remote Working Driving Digitization and Automation
- Eventual Return to Normal



# Disclosure Workflow

## Disclose

Quickly and easily complete all disclosures in a device-friendly interface

## Review

Configurable approvals with automatic notification and communications with a complete audit trail

## Follow-up

Create and manage follow-up actions associated with disclosures

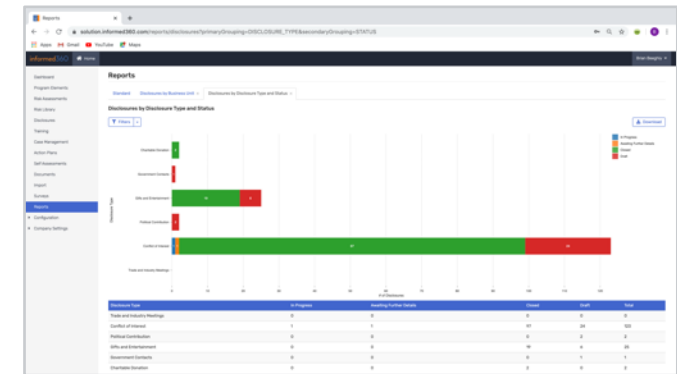
## Analyze

Slice and dice the data to understand substantive and operational trends

## Report

Leverage best practice reports or build your own

ID	Name	Disclosure Type	Risk	Approval	Created Date	Expires
2000-0001-001	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-002	Bob Reynolds	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-003	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-004	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-005	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-006	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-007	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-008	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-009	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM
2000-0001-010	Andrew Nebbett	Conflict of Interest - Supplier	Open	Open	February 10, 2020, 10:22 AM	March 10, 2020, 10:22 AM



# Convenient, Central and Consistent

## INTEGRITY IN OUR ACTIONS

### CONFLICTS OF INTEREST

When conducting Waste Management business, you must always act in the Company's best interests. Conflicts of interest can arise when your personal interests or relationships interfere with your loyalty to Waste Management. An example of a conflict of interest

## Policies

A "conflict of interest" can arise when your personal interests or relationships interfere with your loyalty to Waste Management. An example of a conflict of interest

## Training

- ✓ Anti-bribery, anti-corruption
- ✓ Charitable contributions
- ✓ Conflicts of interest
- ✓ Corporate opportunities
- ✓ Gifts and entertainment
- ✓ Outside business interests
- ✓ Political campaign activities

## Expenses

Date	Description	Amount
Aug 21, 2016	Hotel - San Francisco	\$932.77
Aug 21, 2016	Hotel - San Francisco	\$32.31
Aug 21, 2016	Hotel - Dallas, Texas	\$68.23
Aug 21, 2016	Warehouse - San Francisco	\$518.70

## Communications



### Issue Highlights

**Annual Administrator Conflicts of Interest Disclosure Process**  
The Annual Administrator Conflict of Interest Disclosure Process will launch next month; designated administrators will receive a request to complete a brief Annual Questionnaire, which is due on June 10, 2016.

### Conflict of Interest Certification

Certification that read and understand company's Conflict of Interest Policy

Page: 2 of 5  
Progress: 40%

## Certifications

The companies Conflict of Interest Policy can be reviewed [here](#).  
Customers are anyone that purchases our solutions.

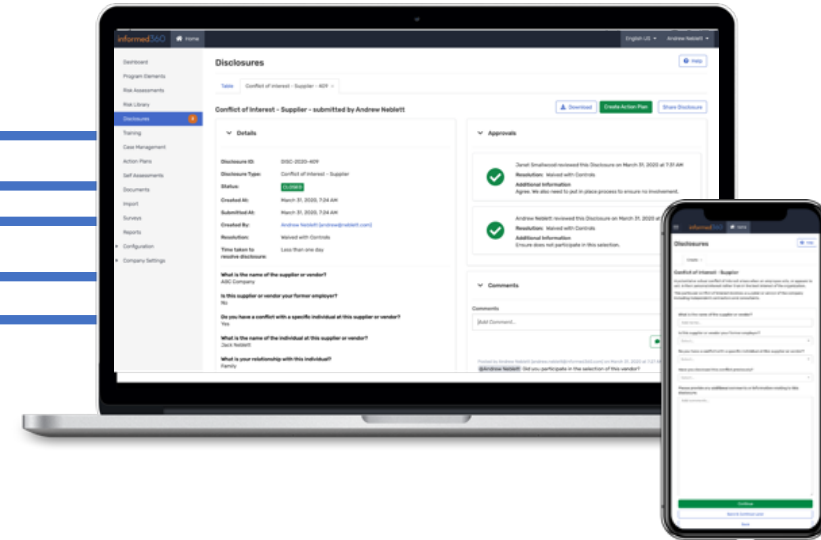
2.1. In the past twelve months in any role at informed360, have you supervised, hired, evaluated or been involved in decisions about payment, compensation or promotion of any family member or anyone with whom you have a close personal relationship?

No

Previous Next

Link to Other Systems

Connect to SSO and HRIS



Accessible Anywhere on Any Device

# Dynamic Disclosures Demo

# Questions

# Final Thoughts

- Define your automated process and map your workflows
- Conduct pilot tests, tweak forms, and then go-live
- Make it easy and keep it simple for employees and reviewers
- Communicate with the employees
- Maintain transparency and consistency
- Track remedial measures related to disclosures
- Continuously improve – analyze data and act on it
- Don't wait – act now



# Contact Information



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 Thank You

# Technology: Gifts and Entertainment



Q4E.14 - What technology do you use to track gifts and entertainment given to or provided by your employees? Please select all that apply.  
number responding = 125

