

Success Story

Brazil – A Wholehearted Commitment to Compliance, Integrity and Ethics

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Global Estratégias Financeiras

Financial services

- Call centre setting
- Debt settlements
- +400 employees in seven large departments
- Mirian Cidral leads a team of sixteen in the Finance and Controllershship Department and is a member of the company's Ethics Committee.

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Leading the way with a new programme

In our country the financial sector in general has a negative image because many companies behave in a harmful and corrupt manner. Global, however, has always worked on the pillar of transparency with its customers and stakeholders. Due to the nature of our business, we handle large amounts of sensitive financial data from our clients, and we wanted to stand out as a company that operates with transparency and integrity by creating our own compliance programme and integrity policies.

The IntegrityApp: Connecting Global with the Alliance for Integrity

During our search for ways to improve our compliance programme we found TheIntegrityApp and loved its functionalities. This tool allowed us to measure our own compliance level, which in turn served as an opening of doors for the connection between the Alliance for Integrity and Global. We designed ethics and integrity standards and publicised these internally. We then embarked on the Integrity Journey which showed us the far-reaching impact of corruption and how a multisectoral approach will help achieve the best results possible.

Learning the ABCs of compliance

On the Integrity Journey we learnt the foundation of a compliance programme. One of the main activities was to create a Code of Ethics with enough elements and

resources for a complete living document that would be accepted internally and applied throughout the company. This required studying the most important concepts to build the foundations of our compliance programme and business value.

A game to implement the new compliance system

We noted a considerable increase of interest by our top management who then worked on writing the Code of Ethics collaboratively, following all our daily scenarios. It was essential to engage everyone in Global in the topic. We hired a consultancy to develop a scenario-based compliance game with twelve situations in which our staff had to deal with various ethical dilemmas.

The elements that helped us the most in our process towards compliance were the practical lessons and exercises during the Integrity Journey. The DEPE corruption prevention training was extremely valuable since it included the most relevant case scenarios for our company.

Launching the Code of Ethics in the middle of a pandemic

This was a serious challenge, with communication being the most difficult part. It was hard to make it appealing, to get people interested and engaged and to reach a broad

audience within the company. The Integrity Journey was a turning point in terms of attitude towards ethics and integrity in our company. Today these topics are at the centre of our daily activities, in meetings and in our strategic planning. Our employees started to feel proud of our integrity standards and reputation which makes us very happy and encourages us to keep working on our compliance programme.

Publicising the new compliance policies

An essential task is communicating the new compliance standards to our suppliers and external partners. We are still assessing our suppliers' feedback on how more compliance and integrity will impact our relationship with them. We hope to influence our partners and spark a fire towards the construction of a more ethical business environment in our region and turning it in a cultural feature.

Compliance and Integrity: A tiebreaker in business deals

Our commercial department staff, too, has achieved great changes after implementing these steps towards more integrity. The department which is in direct contact with clients realised how clients value this distinction in compliance which will be a deciding factor to close contracts. The reputability of the company has experienced the biggest impact from the strengthening of our integrity programme which has allowed us to feel more confident and more at ease when it comes to the security of our

clients' information. Since we deal with confidential data, we focused on communicating the development of our compliance products (e.g. policies in line with Brazil's upcoming General Personal Data Protection Law (LGDP), compliance measures and more) to our customers and our employees. This helps us to show how we can handle all these operations in a very safe, secure and formal manner and simultaneously grow our business, particularly with large corporations and multinationals.

Integrity and compliance cannot be done half-right

The biggest lesson we learnt through working on our compliance programme is that as a company you must be 100% dedicated to compliance, integrity and ethics and continue to strengthen these values. I am proud of our collaborative approach in developing our Code of Ethics and the implementation of innovative approaches such as the compliance game. These were our success stories. The participation in the Integrity Journey was essential to give us clarity and be able to implement compliance effectively.

My recommendation for other companies is to not look for a one-size fits all solution. Each company has its own requirements and should assess how robust its compliance programme must be, taking into consideration financial resources, time and know how. It will then be able to choose the right priority actions within the scope of integrity and compliance.

