COMPLIANCE & ETHICS

JCTFVA FY24

TOP FOCUS AREAS

- **Awareness.** Create and maintain a pervasive awareness of the program, its practices, and the mean by which to report concerns.

- **Integration.** Develop shared understanding of what it means to operate in compliance with law and regulation and in accordance with ethical principles.

- **Identification.** Identify and remediate compliance and ethics risks, vulnerabilities, and lapses.

FY24 COMPANY GOALS

1. Create and maintain awareness of the Compliance and Ethics Program, compliance and ethics requirements and expectations, and the means by which to report concerns.

- Ensure awareness of ethical sales practices and leading with integrity.
- Regularly communicate the importance of compliance with Privacy Principles including participation in Global Privacy and Information Security communication campaigns (e.g., Privacy Awareness, Spring Cleaning, Security Awareness).*
- Ensure full participation in, *and timely completion of,* Code of Conduct, Anti-Corruption, Fair Competition, Federal Government Contracting, Data Privacy, and Optional Protection Product Sales Practices training.
- Utilize CE Toolbox communication materials to drive awareness of compliance and ethics principles and participate in Corporate Compliance & Ethics Week Nov. 5-11.

2. Ensure compliance with law and regulation and adherence to ethics principles.

- Develop and implement procedures and controls to ensure compliance with the Code of Conduct, and Anti-Corruption, Competition, Federal Government Contracting, Data Privacy, and Optional Protection Product Sales Practices policies.
- Develop and implement the suggested actions on the Group Privacy Framework, including proper handling of privacy questions, concerns, or incidents. *
- Periodically measure employee knowledge of key compliance and ethics requirements and expectations (e.g., Microsoft 365 Form surveys/ quizzes).
- In response to findings of non-compliance with law and regulation, misconduct, and ethical lapse, take appropriate disciplinary action, implement remedial measures, and leverage "lessons learned" to educate employees on expectations.

3. Proactively identify compliance and ethics risks, vulnerabilities, and lapses.

- Utilize Internal Audit data-analytics tools ("Continuous Monitoring" reports) to identify activity that may indicate non-compliance with law and regulation, misconduct, or ethical lapse.
- Utilize the Privacy Third-Party Data Sharing Inventory Template to identify areas of potential risk.*

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- Develop and utilize Group-specific data-analytics tools and audits to identify activity that may indicate non-compliance with law and regulation, misconduct, or ethical lapse.
- Develop and utilize mechanisms to identify improper sales practices, including the use of customer complaint tracking.
- Conduct root-cause analysis for investigations and document and discuss as part of CEC meetings.