Program Area/Element	Task (KPI if bolded)	Lead	Support
Governance, Oversight & Resources	**Create and adopt action plan annually (with updates as needed); values embedded or in a separate action plan**	JRO	Country Leads
	Conduct meetings with Board and reporting to Senior Management	JD	JRO
	Identification of resources/budgeting, annually	JD	KK
	Update and distribute KPIs annually (including focus on values/effectiveness)	JD	JRO
	Head Office AC Committee meetings	JD	JRO
Program Policies & Guidance	Review, update and distribute through automated tool simplified compliance procedures and standards	RM	CV
Conduct at the Top & Messaging	**Create and implement communication plan, including senior leadership messaging**	Country Leads	*Comms*
	Leadership training, 360s, promotion decisions, PCs to include compliance and values	JRO	KK
	Draft and publish compliance newsletter	RM	
Hotline & Reporting	Collect, review and report information gathered in NAVEX	KK	
	Improve data gathering process, metrics, and analysis, and increase company reporting (NAVEX, GAN, BPR, quarterly reports, KPI status assessments, investigation transparency, etc.)	CV	KK
Training & Advice	**Develop three-year training plan, including focus on values and shorter trainings to facilitate effectiveness testing. Review and update embedded annual plan**	RM	KK
	Deliver training to employees and third parties (live and online) based on annual mapping exercise	KK	CV
	Create and roll-out Compliance App; update content annually	CV	
Testing	**Correct/address all significant AC and HRA assessment findings within six months of identification**	JRO	*RM&A*
	Adjust testing approach - (a) values based testing (leadership values, PCs, site performance against values), and (b)effectiveness of each program element	JD	JRO
	Review assessment program process, including self-assessments, and establish annual plan. Execute plan and track status and outcomes, including VPSHR and HRA	JD	*JRO*
Enhanced Processes	**PEP questionnaires, due diligence and controls completed for required employees/potential employees**	KK	*Human Resources*
	Employees in Positions of Trust go through the appropriate due diligence process	KK	*Human Resources*
	Follow AAE process, including requests submitted prior to spend, using GAN	JRO	CV
	Build and implement HRV incentive programs for positive compliance accomplishments/steps taken	JD	JRO
Monitoring	**Vendors onboarded correctly and HRVs have appropriate due diligence and controls implemented, including enhanced and individualized controls for HRVs**	JRO	CV
	Review appropriate HRV payments, petty cash expenditures and employee expenses (gov't-facing employees) on at least a quarterly basis	JRO	CV, *Finance*
	Conduct anti-fraud employee monitoring and employee/potential employee monitoring (PEPs)	GS	JRO, KK, *Human Resources*

	Third party monitoring (anti-fraud)	JD	JRO
Investigations, discipline and remediation	Conduct head office investigations and report updates and outcomes in NAVEX	GS	KK
	Enter all investigation data into NAVEX, including those from country/site	KK	Country Leads
	Implement Compliance Advisory Committee	JD	JRO

Deadline/Frequency	Status	Notes
Annually, Jan 2019	Complete	
Quarterly	In progress	
Jul-19		
Jan-19	Complete	
Quarterly		
Dec-18	In progress	Simplified, integrate values, use technology, localize for effectiveness
Annually, complete by Dec 2018	In progress	
Jul-19	In progress	Honour code and demonstration of leadership
Quarterly	In progress	
Monthly	In progress	Analytics reporting
	In progress	
Oct 2018, annually Feb 2018	In progress	
Ongoing, complete by Dec 2018	In progress	
Oct-18	Near completion	
Ongoing, complete by Dec 2018	In progress	
Ongoing		
Ongoing, complete by Dec 2018	In progress	
Ongoing, complete by Dec 2018	In progress	
Ongoing	In progress	
Ongoing, complete by Dec 2018	In progress	
Ongoing, complete by Dec 2018	In progress	
Quarterly	In progress	

Ongoing	In progress	Improve transparency, completion rates. Capture data (including HR) & use analytics for reporting/trends
Ongoing	In progress	
		Generate confidence in outcomes