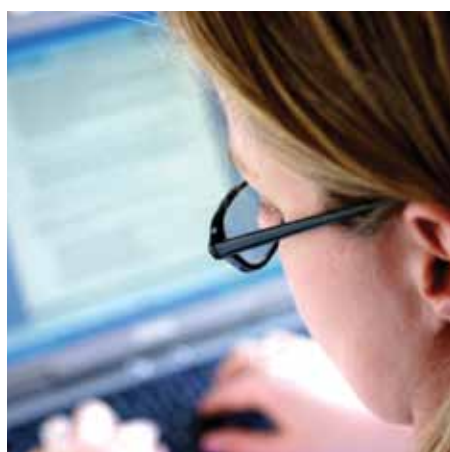


EduNetwork

Tools for Automating Third Party Compliance Training



Deliver Critical Training to Resellers and Agents

With heightened focus on anti-corruption and third party channels, organizations today need to train and share critical compliance policies with their agents and resellers around the world.

EduNetwork is a suite of web-based tools that enable compliance teams to capture third party profiles, conduct risk assessments, and automate the delivery of compliance training and compliance activities to third party agents and resellers. All activities are captured in an audit-ready format, so your team can demonstrate commitment to third party compliance.

Address the Compliance Risks of Third Party Distributors

Many compliance teams today know that training third parties is as critical as training employees, as third parties are now being implicated in many anti-corruption investigations. And yet, they struggle to implement anti-corruption and related policy training throughout the distribution network.

The largest hurdle is gaining the ability to capture – and maintain – the records of the individual resellers, agents and consultants who are acting on the company's behalf. Without accurate learner data, compliance teams cannot effectively track the compliance training that occurs to third parties. Complicating this issue are firewall policies, dispersed regional locations and third party turnover.

That's why UL Quality, Compliance and Learning has created EduNetwork: a series of tools that enable compliance teams to easily capture third party learner information for the purposes of delivering company-specific compliance training. In this way, companies can demonstrate to internal and external auditors that they have conducted anti-corruption due diligence programs that span across the global distributor network.

Key EduNetwork Features and Benefits

Enterprise-Wide Learning Features: EduNetwork is available within ComplianceWire®, UL Quality, Compliance and Learning's award-winning LMS for regulated industries. For new clients, this means gaining access to dozens of proven features, such as support of multiple training types (documents, computer-based courses, classroom events, etc.), 30+ language interface options, and dozens of standard reports. For existing clients, EduNetwork can be added to your existing ComplianceWire system, which greatly reduces the learning curve for your key administrators, while providing a centralized repository that houses both employee and non-employee records.

Built-In Security: EduNetwork enables you to segment third party training groups for security reasons. For example, you can prevent one third party administrator from being able to view or edit the individuals within another third party.

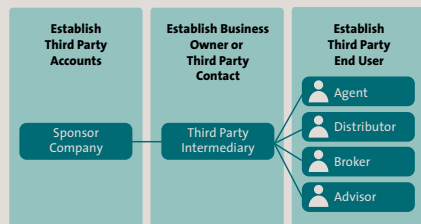
Automated Third Party Training and Communication: EduNetwork empowers the third party's business sponsor to establish the account and then identify the number of learners required. The authentication codes are automatically e-mailed to each individual so they can self-register and then login to take training. These tools remove the burden from the compliance team.

Ability for Learners to Maintain Their Profiles: During the registration process, the individual learner must include attributes that you define; the learner can also establish their user ID (typically their e-mail) and a password; they will use this information to login to the training system to take the assigned training. As the learner's information changes, they have the ability to maintain it in the system, reducing the administrative burden for compliance teams.



Option to Store Content Securely: Our optional “content hosting service” enables clients to upload SCORM courses, internal control documents, and even CVs on our secure servers, so that non-employees can access files without interfering with your company’s firewall policies.

Keep Accurate Records That Demonstrate Compliance: When a learner completes an assignment, an electronic signature is required, which generates an audit trail for unimpeachable recordkeeping. Administrators can then retrieve this information through standard and customized reports to present to regional compliance administrators, senior management and auditors.



Delegate Communication and Training Management to Business Sponsors

Compliance teams can leverage a third party's business sponsor to deliver training schedules and expectations to the third parties for which they are responsible.

As this flow chart demonstrates, the Third Party Intermediary (TPI) can input general third party details, such as address and key product lines serviced. The TPI then sends an e-mail to a key contact who can distribute the authentication codes to the third party.

How EduNetwork Works

STEP 1: Defining Your Self-Registration Page

Your company may have unique information to capture about each third party, to help with assignments and reporting purposes. With the help of UL, you can have these unique attributes built into the self-registration page, such as “Third Party Type” (supplier, reseller, contractor, etc).

You can also add your company’s branding to the self-registration page, to reinforce your company’s image throughout your network.

EduNetwork’s Self-Registration enables the learner to:

- Enter standard information (first name, last name, address, etc.)
- Enter up to 15 fields defined by the company (type of supplier, region, department, manager, etc.)
- Select from a company-defined User Group (for assignment purposes)
- Establish the learner’s login credentials (User ID and Password)
- Edit this information based on a frequency defined by the company

STEP 2: Designating a Third Party Intermediary

You may have already identified a business sponsor at your company who is responsible for the third party relationship. Or you may have a key relationship manager who works for the third party itself. Either way, this individual manages the relationship, and as such, can play a role in establishing the training program for the individuals within the third party.

Initially, the third party intermediary will enter third party information into ComplianceWire, and also identify the number of “learner seats” required for that third party. It may be that not all individuals within the third party require compliance training, and this third party intermediary can help determine the actual number.

Once this number is established, the third party intermediary can indicate that number in ComplianceWire. The result is that ComplianceWire will automatically:

- Generate unique authentication codes for each individual so that they can each “self-register” within the ComplianceWire system using the code.
- Send e-mails to the business sponsor containing these codes so they can forward the codes to the appropriate individuals within the third party. The individuals can use the web link and codes to self-register and complete their profile.
- When the learner successfully registers, the account is activated and training can be assigned.

EduNetwork’s Administrator Tool enables you to:

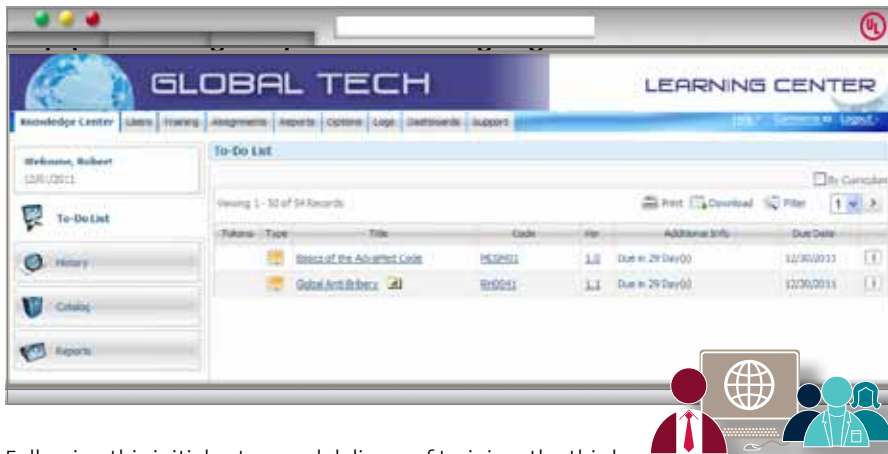
- Establish a Third Party account (e.g. name, company, location, etc.)
- Designate the number of learners within the Third Party
- Assign the Third Party key contact
- Assign the Third Party business sponsor



STEP 3: Assigning Targeted Compliance Training

Your compliance team may have established a compliance training matrix – that is, a grid that defines which training items must be taken by third parties, based on their roles, product line, geographic region, etc. Training items could include anti-corruption policies, technical specifications or an electronic consent form.

EduNetwork enables you to group these items into a single “curriculum” and then assign it to learners based on how they answered the self-registration page. When these assignments are made, ComplianceWire automatically generates “notification” e-mails that are sent to each learner, prompting them to visit ComplianceWire to login and begin taking the training.



Following this initial set up and delivery of training, the third party intermediary can then check a number of critical items, such as:

- Which individuals have started and completed their compliance training?
- Which individuals within “High-Risk” categories have completed training?
- Who is overdue on their training assignments?
- Automatic e-mails can be sent to these individuals, as defined by the administrator within ComplianceWire.
- A compliance dashboard (shown below) enables key senior managers and business sponsors to gain a graphical compliance status, then drill down to view more specific user information.



SURVEY SHOWS EXECUTIVES ARE UNPREPARED

Based on a 2010 KPMG survey of 214 executives in the US and UK to identify compliance challenges, respondents demonstrated a heightened sense of awareness of the compliance risks associated with third parties, representatives, and agents, and yet:

- Two in five respondents do not distribute anti-corruption policies to agents, distributors, vendors, brokers, joint venture partners, or suppliers.
- Three in five respondents with anti-corruption compliance training programs do not require any third party representatives to participate in this training.
- Three in five respondents with “right to audit clauses” in third party contracts have not exercised this right.

Source: KPMG: Global Anti-Bribery and Corruption Survey, 2010



Our Health Care Compliance Library

One of several options available in EduNetwork are UL's standard Health Care Compliance courses, which have formed the backbone of more than two dozen clients' ethics and compliance programs.

Our courses are designed by experts in adult learning, and employ proven instructional design methodology and mastery to foster deep processing and understanding of the material, and actually result in behavior change. UL works with leading subject matter experts to update our courses as regulations and guidelines change.

Key compliance course topics include:

- PhRMA, AdvaMed and EucoMed Codes
- Privacy Guidelines for Sales Representatives (HIPAA)
- Interactions with Health Care Professionals
- Regulation of Advertising and Promotional Activities
- FCPA and Anti-bribery
- UK Bribery Act
- Bloodborne Pathogens for Health Care Workers
- Contracting with Health Care Professionals
- Operating Room Conduct
- Anti-kickback Statute and OIG Compliance
- Off-label Marketing
- Adverse Event and Medical Device Reporting

Automating the Risk Assessment Process

EduNetwork features an optional tool, SmartForms, which automates the risk assessment process for compliance teams. With SmartForms, a learner is automatically placed into a low, medium or high "risk group," based on answers given to an assigned form. The actions performed for this risk group could include compliance training or other activities taken by the compliance team.

With SmartForms, you assign "rules" to the form so that when the learner provides a specific answer, that learner will be added to a user group, which was designated for a follow up action (advanced training, a one-on-one call with a compliance specialist, etc). When the learner completes the form, he or she provides an electronic signature, which is unimpeachable and secure, simplifying recordkeeping and administrative tasks.

The end result is a completely automated risk assessment process, that provides the Compliance Officer with visibility into compliance and risk through robust management reports and dashboards that categorize learners by the type of conflict and other risk factors.

EDUNETWORK: SUMMARY OF KEY FEATURES

- ComplianceWire captures records that link third party entities, business sponsors and individual learners within third parties.
- Ability to define the number of learners for each third party.
- Ability to define a third party intermediary within your organization who can notify third parties of compliance requirements.
- Ability to perform risk assessments that drive learners into appropriate roles for targeted training.
- Individuals within third parties can self-register and provide details that drive automatic targeted training assignments.
- Training and communication activities are tracked for audit reporting purposes.
- ComplianceWire reporting functions, including training completion status, are available, and can be scheduled.
- Compliance dashboard captures third parties for senior management and compliance oversight.