

# Reaching Compliance Goals with TRACE

## A Case Study with Aleatica



Pure transport infrastructure operator **Aleatica** was created with the mission of offering safe and sustainable mobility solutions supported by cutting-edge technology that anticipate customer needs. A TRACE member since it was founded in 2018, Aleatica designs and operates highways and other mobility assets in seven European and Latin American countries.

Aleatica's team has worked to quickly adopt internationally recognized compliance best practices, prioritizing commercial transparency. With the full support of its board of directors and senior management, Aleatica has further bolstered efforts to strengthen corporate integrity, a core company pillar.

As part of these efforts, Aleatica updated its code of ethics & conduct and its anti-corruption policy in 2022 to align with its company values, linking the conduct guidelines to each of the five pillars that guide the company's long-term commitments. Additions included ethical dilemmas and questions and answers to make each of the sections of the new code more understandable.

The company's compliance team leveraged TRACE's **eLearning** curriculum and **Resource Center** to develop a series of **25 face-to-face sessions**, **eight webinars** and **an online course** to train **2,417 employees** on these updates.

**25** face-to-face sessions

**8** webinars

**1** online course

Aleatica's additional training goals in 2022 included:



**reinforcing the company's commitment to corporate integrity and zero tolerance for any type of corruption**



**updating employees on improvements to third party due diligence procedures**



**training managers within the company on how to promote integrity and lead by example**

In addition to mandatory training at regular intervals, Aleatica continues to promote corporate integrity and foster a shared knowledge base among its value chain through ongoing communication of key compliance topics. In 2022, Aleatica's compliance team tracked more than 25 compliance-focused communiques. The topics were diverse, from a video with some of Aleatica's directors explaining key changes to the code of ethics & conduct to other topics related to anti-corruption, conflicts of interest and anti-retaliation.

Additionally in 2022, Aleatica's compliance team conducted ongoing knowledge assessments of its compliance program, completed an intermediary identification and review project, and relaunched its whistleblower hotline under a new provider.

In 2023 and 2024, Aleatica plans to continue its focus on the corporate integrity pillar, including:



**automating parts of its risk assessment and mitigation practices**



**improving the conflicts of interest reporting process to ensure greater traceability and assurance**



**conducting ongoing monitoring of key compliance program elements and adjusting to keep pace with evolving priorities**



**continuing face-to-face compliance training to deliver the greatest impact for employees**

Through TRACE's membership programs, members have unlimited access to our multilingual **eLearning** library and unrestricted access to our online tools, including those for **gifts and hospitality** and for **conflicts of interest**, designed to support the key components of an effective compliance program.

Members are given an unlimited number of **Resource Center** user accounts and receive 25 enrollments for **TRACEpro**, a comprehensive training program for individuals who manage compliance or are regularly exposed to risk. Being part of the TRACE Compliance Community also grants exclusive, complimentary attendance to our annual **TRACE events** held in major business hubs around the world.

To learn more about joining TRACE, visit [www.TRACEinternational.org](http://www.TRACEinternational.org) or write to us at [info@TRACEinternational.org](mailto:info@TRACEinternational.org).