# • TRACE eLearning



## **Award-winning eLearning**

TRACE has been recognized by Brandon Hall Group with five Excellence Awards

GOLD Human Capital Management (HCM) Excellence Learning and Development Awards



**Best Unique or Innovative Learning and Development Program:** Compliance Life
Cycle Learning Plan



**Best Advance in Compliance Training:** eLearning module - "Mission Possible"

GOLD Technology Excellence Learning and Development Technology Award



Best Advance in Learning Management
Technology for Compliance Training:
TRACE Learning Management System (LMS)

SILVER Human Capital Management (HCM) Excellence Learning and Development Awards



**Best Association Professional Development Program:** TRACEpro program



**Best Learning Team** 

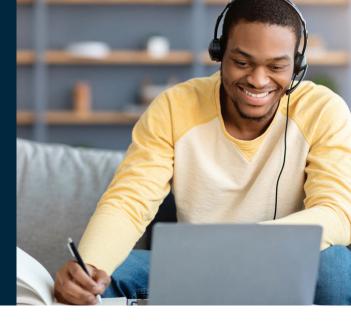
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#### **ABOUT**

## TRACE eLearning



Compliance training helps shield your organization from legal risk, protects your corporate reputation and creates a culture of business ethics. At TRACE, we understand the importance of effective compliance training from both a legal and a business perspective. That's why we offer our members unrestricted access to our award-winning eLearning library and customizable training platform at no additional charge.

Developed in conjunction with subject-matter experts, our training modules offer top-quality content and educational support to global organizations seeking to:



**Reduce Risk** 



Raise Awareness



**Reinforce Compliance** 

- Build a legally defensible eLearning program that can withstand regulatory scrutiny.
- Mitigate the risk of compliance violations by providing employees and third parties with the knowledge they need to comply with key regulations.
- Improve learner engagement and retention by leveraging the most up-to-date learning techniques.
- Keep pace with evolving regulations and innovations in compliance training and eLearning.



TRACE's online training platform has enabled us to rapidly deploy training in local languages on a broad basis to our employees. On the whole, the system has provided incredible value and cost savings in training for us.

Cynthia M. Wallace, Esq.

#### Hosting, Administering and Managing Training

TRACE members receive access to a customizable online training platform that can be used to train an unlimited number of employees and third parties worldwide.

#### **TRACE's Customizable LMS**

TRACE's customizable Learning Management System (LMS) provides a secure, interactive, multimedia and web-based learning environment. Support services provided by the award-winning TRACE team include an in-depth training session and ongoing technical support for administrators and learners. The TRACE LMS interface is available in 39 languages. For a comprehensive overview of the training site home page customizations, see <a href="here">here</a>.

#### **Key Features of TRACE's LMS**

- Full control over the administration of your training site using Administrator account registration or user self-registration for those who prefer a more "hands off" approach
- Automated course enrollments, email notifications and reminders
- Ability to customize your training site homepage, email notifications and reminders
- Learner Engagement features including course surveys, gamification as well as teams and manager oversight directly within the LMS
- Automated/recurring course enrollments

- Custom communication newsletters deployed from the LMS
- Unlimited access; no user limits or per-user fees
- Integration with your internal platforms through API
- Mobile accessibility to the platform via tablets and mobile devices
- Access to various course "bundling" mechanisms including Learning Plans, Catalogs and Course Language Wrappers to support course prerequisites and user language self-selection\*

#### **Tracking & Reporting**

To track and monitor learner progress, the TRACE LMS offers a robust yet easy-to-use reporting tool that allows training administrators to export and save updated records on enrollees. Through the reporting feature, administrators can schedule and run customized reports by selecting and editing data fields, including but not limited to course status, date of completion, last login and more.



If you wish to use your own internal LMS, you may request SCORM files for your desired courses. Please note that as all courses have been designed for TRACE's LMS, you may need to configure the courses to work on your internal LMS. TRACE will not be responsible for providing technical support for courses housed on internal learning management systems.

### **TRACE eLearning Resources**

TRACE offers a variety of resources designed to meet your organization's compliance training needs, including:



More than 50 animated videos and graphic novels



Over four dozen mini guides, case studies, guidebooks and white papers



A host of materials for ongoing compliance communications, including training aids, videos and compliance games



Hours of podcasts exploring diverse topics including corruption, fraud, money laundering and sanctions



Hundreds of webinars covering a wide variety of compliance topics



5 complimentary TRACEpro enrollments

TRACE's eLearning courses are available in several languages to meet the needs of global organizations and ensure comprehension worldwide.

We frequently add new translations to our eLearning library based on member requests. For other language options, please visit our Compliance Training Courses Language Availability webpage or reach out to training@TRACEinternational.org to confirm course language availability.



Our core languages are **English**, **Chinese** (Simplified), **French** and **Spanish** 



All TRACE courses in our core languages are compliant with **WCAG accessibility standards** 

## **Full-Length**

#### **COURSES**

Full-length courses address key compliance issues and introduce employees and third parties to the law while exploring real-life situations that can lead to compliance violations. TRACE course content is updated regularly to keep pace with evolving regulations and innovations in compliance eLearning.

#### **Compliance Series 1**

- Anti-Bribery Challenge for Employees
- Anti-Bribery Challenge for Third Parties
- Anti-Bribery for Shipping and Logistics
- Data Protection & Privacy
- Economic Sanctions

- Global Antitrust & Competition
- Insider Trading
- Intersection of the GDPR and Anti-Bribery
- Third Party Perils
- UK Criminal Finances Act

#### **Compliance Series 2**

- Anti-Corruption Training (ACT) for Employees
- Anti-Corruption Training (ACT) for Third Parties
- Anti-Money Laundering\*
- Forced Labor & Human Trafficking\*\*
- Global Conflict Minerals Regulation\*\*\*
- Sanctions Compliance (Part One & Part Two)
- U.S. Trade and Export Controls

#### **Compliance Supplement Series**

- Forced Labor & Human Trafficking (CSS)
- Guide to Compliant Gifts & Hospitality
- Spotlight on Germany
- Third Party Risk Management

#### **Ethics Series 1**

Sexual Harassment Prevention

#### **Compliance Series 3**

- Global Anti-Corruption Overview
- Mission Possible Busting Bribery

#### **Ethics Series 2**

- Respect in the Workplace
- Diversity and Inclusion in Action

<sup>\*</sup>An earlier version of this course is available, "Compliance Series 1: Anti-Money Laundering".

<sup>\*\*</sup>An earlier version of this course is available, "Compliance Series 1: Avoiding Trafficked Labor".

<sup>\*\*\*</sup>An earlier version of this course is available, "Compliance Series 1: Conflict Minerals".

#### **Anti-Bribery Challenge**

(Employee and Third Party Versions)\*







12 LANGUAGE

Leveraging situational learning and scenario-based techniques to enhance learner engagement and retention, this course provides employees and third parties with guidance on regulatory requirements for anti-bribery compliance, types of behavior that can trigger a violation and suggestions for responding to problematic situations.

As part of the roleplay experience of the course, the learner visits core departments within a multinational organization, evaluating facts and scenarios for potential bribery risks.

#### **Course Objectives:**

- Identify which acts/behavior constitute bribery based on global anti-bribery laws and real world facts
- Understand the skills necessary to effectively analyze situations and avoid potentially problematic situations
- Evaluate the risks bribery poses to both organizations and individuals
- Understand why ethical conduct is important and the pitfalls of unethical conduct





## Anti-Bribery for Shipping and Logistics







18

Utilizing real-life scenarios and case studies to explore the current state of anti-bribery law in key jurisdictions, this course addresses the specific anti-bribery compliance challenges faced by multinational organizations with global customs, shipping or logistics operations.

- Learn what types of behavior and transactions lead to bribery risk within the shipping and logistics sector
- Review steps that can be taken to minimize exposure to bribery in various high-risk regions
- Understand best practice recommendations for proactively identifying red flags and responding to specific scenarios "on the ground"





<sup>\*</sup>The Employee version is available in 18 languages.

#### **Data Protection & Privacy**







13 LANGUAGE

Data protection laws are complex with many differing in terminology, details, interpretation and enforcement approaches. Often having extraterritorial reach and overlapping application, these laws can also be inconsistent from country to country.

Providing a top level overview of data protection law, without focusing on any specific data protection law or their distinctions, this course equips learners with a base level understanding of what data protection is, how data is regulated/protected and steps parties can take to reduce exposure to breach incidents.

#### **Course Objectives:**

- What data protection and privacy mean and why it is important in business practices
- Understand the rules, regulations, and laws that govern data protection and privacy throughout the world
- Comprehend key data protection and privacy terms
- What to do if there is a data breach
- Appropriate measures and safeguards for keeping data safe and secure





#### **Economic Sanctions**







**24** 

The primary objective of this course is to increase awareness of economic sanctions and equip learners with the knowledge and skills necessary to identify and report potential issues to their compliance departments. Learners will gain an understanding of how their jobs may be impacted by economic sanctions as well as common red flags that may lead to sanctions violations.

- Learn what economic sanctions are and their purpose
- Understand which activities/transactions violate global sanctions regulations
- Recognize how day-to-day business activities may be impacted by economic sanctions
- Identify red flags and assess real-world situations to determine if economic sanctions are implicated





#### **Global Antitrust & Competition**









Offering a synopsis of the regulatory landscape in the U.S. and EU, this course provides information, tools and resources a company can leverage as part of one's global antitrust compliance program. Addressing key concepts, definitions, points of risk exposure and compliance best practices under U.S. and EU competition law, it should be noted that this course does not address the entirety of the global antitrust and competition landscape.

As part of the course, learners are presented with optional "breakout" mini-module content presenting a deeper exploration of specific topics and regulatory concepts as well as downloadable resources that can be used as a point of reference to reiterate key concepts and compliance best practices.

#### **Course Objectives:**

- Understand the applicable antitrust/ competition regulatory scheme for the U.S. and the EU
- Recognize scenarios, business transactions and circumstances that can present antitrust concerns
- Learn how to minimize personal and organizational risk by following best practice compliance recommendations

Purpose of Antitrust & Competition Law
Autherst and competition law is juminarily focused on identifying the line between
Vigorous competition and authorogenitive or predatory conduct that reduces competition to
the detriment of commences.

Click on each finage below to form more about the purpose of this body of lew.



#### **Insider Trading**









Guided through the course by a narrator posed as a member of a corporate compliance team, learners explore underlying concepts, cases and scenarios related to insider trading. Largely based off of U.S. law, this course includes a review of real life enforcement actions demonstrating how insider trading cases develop including an assessment of key details to be mindful of that may create risk exposure to insider trading.

An added benefit of this course, it also provides an overview of key corporate policies and practices addressing insider trading including 10b5-1 plans, designated insiders, trading windows, confidential information and tipping and other considerations.

- Understand the basics of insider trading
- Recognize the key elements of insider trading
- Be aware of the consequences and liabilities of insider trading
- Best practice recommendations for avoiding insider trading risk





## Intersection of the GDPR and Anti-Bribery









The European Union's General Data Protection Regulation (GDPR) has been in effect for some time with corporate anti-corruption efforts and personal data protection remaining in tension. Anti-corruption compliance programs must process personal data to detect or prevent bribery, while various data protection regimes restrict, control, and place *very* complex and onerous requirements on any such processing.

In this course, learners explore key points at the intersection of personal data protection and business transparency with a focus on anti-bribery compliance and third party due diligence.

#### **Course Objectives:**

- Understand the key components and main data protection obligations under the GDPR
- Comprehend the tension between antibribery and EU data protection requirements
- Formulate an approach for bringing your existing anti-corruption compliance and third party due diligence program into agreement with the GDPR

#### **Third Party Perils**









Third parties come in many forms and play a key role in the success of most enterprises. Whether acting as an intermediary, sales agent, consultant, or local influencer, third parties often create the highest risk exposure for companies, especially when interacting with a government or government-controlled entity.

In this course, the learner revisits key bribery concepts as various examples and case studies are presented that explore real-life scenarios involving potential third party risks as well as steps that can be taken to reduce such risks.

- Understand why third parties present the highest bribery and corruption risk for most companies
- Learn how risks may arise within the context of various third party relationships and transactions
- Recognize third party red flags and how to proceed
- Appreciate how the effective use of due diligence and ongoing monitoring can reduce third party risk









#### **UK Criminal Finances Act**









Designed as an introductory course, companies can use this module to support the implementation of reasonable prevention procedures in compliance with the UK Criminal Finances Act.

As part of the course, learners receive an overview of the offenses created under Part 3 of the Act, suggestions for meeting specific requirements under the Act, and an understanding of the obligations of employees or persons acting for or on behalf of your company.

#### **Course Objectives:**

- Understand the differences between tax avoidance, tax evasion and tax planning
- Outline expectations for employees or persons acting for or on behalf of your company under the Act
- Address common scenarios that may raise potential issues and how to spot potential offenses





#### **Anti-Corruption Training (ACT)**

(Employee and Third Party Versions)\*







19 LANGUAGE

Addressing both familiar and new anti-corruption compliance topics, this course utilizes real-world examples to reinforce compliance best practices and skills for conducting business ethically.

Offering an optional feature that allows learners the ability to "test out" of the course without being required to complete the entire module once knowledge proficiency is demonstrated, users can also create their own learning path by visiting case scenarios in the order they select.

- Explore key concepts that drive corrupt business practices as you consider
- Each scenario as presented, noting key lessons learned from each case
- What might have been done differently in each case
- How you might respond if you encountered a similar situation





<sup>\*</sup>The Employee version is available in 21 languages.

#### **Anti-Money Laundering\***







O7

In this course, learners explore various money laundering scenarios and the steps that can be taken to ensure one's day-to-day actions comply with global Anti-Money Laundering (AML) compliance recommendations. Real-world case examples teach learners how to identify and respond to possible red flags.

#### **Course Objectives:**

- Understand what money laundering is, including the stages of money laundering
- Recognize the agencies responsible for anti-money laundering regulation and enforcement
- Understand universal anti-money laundering recommendations and how reporting suspicious activity can help
- Comprehend how money laundering affects business, people and communities





\*An earlier version of this course is available, "Compliance Series 1: Anti-Money Laundering." To view the earlier version, write to training@TRACEinternational.org.

#### Forced Labor & Human Trafficking\*







16

Forced labor can take many forms and require the performance of various services or labor through the use of force, fraud or coercion - all of which are wrong and violate an individual's human rights.

In this course, the learner explores both forced labor and human trafficking, terms broadly included under the umbrella of "modern slavery," as you explore definitions and case studies and receive guidance on how to recognize signs of and what to do if you witness illicit behavior.

#### **Course Objectives:**

- Recognize and be aware of forced labor and human trafficking
- Tips for promoting ethical business practices
- How to formulate a plan to avoid forced or trafficked labor
- Understand what to do if you suspect possible slavery risks and how to report them





\*An earlier version of this course is available, "Compliance Series 1: Avoiding Trafficked Labor." To view the earlier version, write to training@TRACEinternational.org.

#### **Compliance Series 2**

## Global Conflict Minerals Regulation\*









Offering a choice of two learning paths – U.S. Law or Laws Outside the U.S. – this course provides guidance and training on conflict minerals risk management in accordance with both U.S. and EU conflict minerals regulation while also offering best practice compliance guidance and recommendations for due diligence processes.

As part of the course, learners can create their own learning path by selecting U.S. Law, Laws Outside the U.S. or both sections, in order to view the content most relevant to you.

#### **Course Objectives:**

#### U.S. Law

- Understanding the U.S. Conflict Minerals Rule
- Complying with the Dodd-Frank Act
- The future of conflict mineral regulation in the U.S.

#### Laws Outside the U.S.

- Requirements of the OECD 5-step framework and additional regulations outside the U.S.
- Other minerals to look out for
- Reporting red flags
- Assessing your compliance program
- Case study applying what you learned





\*An earlier version of this course is available, "Compliance Series 1: Conflict Minerals." To view the earlier version, write to training@TRACEinternational.org.

#### **Sanctions Compliance**

(Part One & Part Two)







07

Sanctions are economic penalties and trade restrictions that governments impose to influence the behavior of other countries, individuals, groups or companies to achieve international goals. The sanctions regulatory landscape is a complex one with many regulations impacting business and the global economy.

In this course, learners explore key sanctions concepts and understand how various types of sanctions impact day-to-day business. Offered in two parts, learners seeking to have the most comprehensive educational experience will take both Parts One and Two.

#### **Course Objectives:**

#### Part One

- Understanding key sanctions terms
- What sanctions are
- Who sanctions apply to
- Why sanctions are necessary
- Types of sanctions
- Where sanctions apply

#### Part Two

- Who imposes sanctions
- How sanctions apply
- Sanctions red flags
- Consequences of violating sanctions
- Sanctions do's and don'ts





#### **U.S. Trade and Export Controls**









Guided through the course by a narrator posed as a member of a corporate compliance team, learners explore U.S. trade laws, how they apply to companies and individuals and their impact on the sale or trade of various products and services.

This course includes an optional gaming interaction, *Would You Risk It?*, that showcases scenarios designed to test the leaner's knowledge of topics covered in the course. Learners can collect badges and points to win the game.

#### **Course Objectives:**

- Understand the basics of U.S. trade compliance
- Recognize the importance of complying with U.S. trade laws
- Appreciate the consequences of violating trade laws
- Recognize ways to protect yourself and your company from the risks of trade violations

#### **Global Anti-Corruption Overview**









Anti-corruption compliance is an ever-evolving field.

Important corruption mitigation measures and anti-bribery rules and regulations need to be shared and reinforced to ensure understanding across your organization.

In this global overview course, learners explore the latest trends in global anti-bribery compliance and gain tips for spotting possible corruption as you are provided with a global review of the anti-corruption compliance landscape.

- Understand the differences in anti-corruption regulations across the globe
- Review corruption red flags to look out for and how to address them should you encounter them in day-to-day business









#### **Mission Possible - Busting Bribery**







10 LANGUAGES

Offering a fresh approach to anti-bribery training that hones in on why combatting bribery is important in a manner that is both relatable and memorable, Mission Possible is based on the story of a new corporate hire named Gloria and the various situations she comes across during her onboarding.

Presented with a few corruption-related red flags throughout their journey, learners are asked to embark on their own "Mission Possible," serving as Gloria's guide helping her navigate the various situations presented throughout the course.

Incorporating an interactive point and alert feature, learners are encouraged to achieve the "Bribe Buster" badge.

This course concludes with an optional video that shows the real-life impact of bribery on business and communities.

#### **Course Objectives:**

- Identify and analyze acts or behaviors that constitute bribery, based on global antibribery laws
- Explore bribery in the real world and how to avoid potential problematic situations
- Evaluate the risks bribery poses to both organizations and individuals
- Understand how to take appropriate steps to prevent bribery and its potential consequences
- Be able to explain why ethical conduct is important and understand the pitfalls of unethical conduct

## Forced Labor & Human Trafficking (CSS)







O7

Specifically crafted for compliance and legal professionals and business leadership as a supplement to TRACE's Forced Labor & Human Trafficking course, this module was designed to provide a top-level overview of key points and issues relevant to forced labor and human trafficking.

Structured for a management level audience, the goal of this course is to raise awareness of how forced labor and human trafficking can arise in day-to-day business, while highlighting key topics leaders in the global business field today should be aware of to ensure their organization is not exposed to risk in this area.

- Understand the global impact of forced labor
- Recognize prominent myths and assumptions about forced labor
- Review global regulatory requirements addressing forced labor
- Be aware of tips to promote best practices to support CSR and compliance across your value chain









## Guide to Compliant Gifts & Hospitality









Developed as a guide for employees, in supplement to TRACE's Gifts & Hospitality Refresher, this course helps learners identify various points for bribery risk exposure specific to the giving of gifts, hospitality and travel.

Real-life situations provide learners with practical guidance based on best practice recommendations and heightened awareness of the bribery risks often associated with this established part of doing business.

#### **Course Objectives:**

- Understand what may be considered a bribe and best practice guidance for addressing gifts and hospitality as part of a company policy
- Recognize relevant points of consideration for crafting an approach to address gifts, hospitality and entertainment globally
- Comprehend risk-based guidelines for addressing situations that may present issues regarding gifts and hospitality





#### **Spotlight on Germany**









Based on a TRACE *Bribe*, *Swindle or Steal* podcast, this animated course provides a historical review of the state of anti-bribery enforcement and compliance in Germany as well other topics including data privacy, antitrust law, investigations and more.

#### **Course Objectives:**

Understand, specifically within Germany:

- The history of the local anti-bribery regulatory landscape
- Bribery investigations and the role of international cooperation
- The evolution of anti-competition enforcement and compliance
- Do's and don'ts for new market entry, including business partner due diligence
- The evolution of data privacy law and regulation





#### **Third Party Risk Management**









For most companies, performing anti-corruption due diligence on every single third party represents an impractical approach. To address this, companies should design a risk-based structure.

Offered as part of TRACE's Compliance Supplement series, this course has been specifically crafted for compliance and legal professionals and business leadership as a companion module to TRACE's Third Party Perils course. Developed for a management level audience, this course examines how an effective third party risk management program can help your company minimize the risks presented by third parties.

#### **Course Objectives:**

- Recognize the difference between lower and high risk third parties and the impact on risk assessment
- Understand how to design a risk-based approach to third party management
- Review red flags to watch out for and controls to implement at various stages of a third party relationship





#### **Sexual Harassment Prevention**









Designed to provide a sense of what anti-harassment training aimed at employees might look like, this module provides a top-level overview of what is and is not considered harassment in the workplace based on NY state regulation.

To note: This training will not necessarily satisfy the laws of every state. Rather, this course presents one approach for training employees on the topic of sexual harassment and can be customized to your specific organization's approach.

- Understand what is considered sexual harassment
- Review scenarios presenting unacceptable behavior
- Steps to take to prevent inappropriate behavior





#### **Diversity and Inclusion in Action**









A commitment to diversity and inclusion begins with a clear statement of a company's values and beliefs – but it does not end there. To truly achieve an environment that fosters and supports diversity and inclusion there must be substance behind the words.

Learn in this course why everyone within an organization – from employee to the board - must work together to achieve and sustain an inclusive environment as the learner explores what diversity and inclusion mean, how these issues arise and steps to take to prevent discrimination and harassment in the workplace.

#### **Course Objectives:**

- Understand what diversity and inclusion mean
- Recognize how diversity and inclusion arise in the workplace
- Appreciate the risks that arise from failing to properly address diversity and inclusion in the workplace
- Tips for preventing discrimination and harassment in the workplace
- How to build inclusion within a diverse and vibrant workplace





#### **Respect in the Workplace**









Workplaces are inherently people-centered environments.

Studies show that performance improves when people feel respected and find dignity in their work. But what constitutes a respectful workplace?

Delving into the components of a respectful workplace, learn in this course what factors contribute to an environment that fosters respect and how to handle common, day-to-day scenarios that may arise as you explore various types of behavior.

- Understand the elements of a respectful workplace and the detrimental impacts of discrimination
- How to operate effectively across individual qualities
- What harassment and discrimination look like in today's workplace
- The difference between uncomfortable and unacceptable behavior
- How to ensure physical safety and security in the workplace, and steps to take to seek help if needed





## Refresher

#### **COURSES**

Refresher courses are designed to provide more detailed guidance on specific anti-bribery compliance issues that tend to be top-of-mind for most organizations. Courses are no longer than 15 minutes and can be used to train employees in higher-risk locations and positions or between annual training cycles. Gamification techniques are utilized to improve retention and results, while also providing a unique learning experience.

#### **Compliance Refresher Series 1**

- Anti-Bribery for Employees
- Anti-Bribery for Third Parties
- Gifts & Hospitality
- Third Party Due Diligence

#### **Compliance Refresher Series 2**

Conflicts of Interest\*

#### **Compliance Refresher Series 3**

- Global Anti-Bribery Challenge
- Anti-Corruption Training (ACT) Refresher:
   Regional Compliance Spotlights\*\*
  - APAC: China, India, Singapore, Japan
  - EMEA:
    - Europe: France, Germany, the UK
    - Middle East: UAE, Saudi Arabia, Qatar
    - Africa: Nigeria, South Africa, Kenya
  - North America: U.S., Canada
  - Latin America: Brazil, Argentina, Mexico

To view an earlier version, write to training@TRACEinternational.org.

<sup>\*</sup>An earlier version of this course is available, "Compliance Refresher Series 1: Conflicts of Interest".

<sup>\*\*</sup>An earlier version of this course is available, "Compliance Refresher Series 2: Anti-Bribery Challenge Regional Spotlights".

#### **Anti-Bribery**

(Employee and Third Party Versions)\*







06 LANGUAGES

Revisiting the compliance missteps of Gloria, a seasoned project manager for a large architectural and engineering firm, the learner in this course is tasked with correcting Gloria's compliance mistakes. The ultimate goal of the course - secure Gloria's release from jail.

Divided into two lessons, each section of the course presents key takeaways, a real-life case study and a set of facts that seek the learner's opinion on how Gloria should handle each situation.

#### **Course Objectives:**

- Learn what bribery is and what types of transactions and requests can constitute a bribe
- Recognize requests for bribes
- Understand common reasons bribes are paid
- Gain awareness on how to respond appropriately to requests for improper payments





\*The Third Party version is available in 8 languages.

#### **Gifts & Hospitality**







11

Designed to reinforce key concepts related to gifts and hospitality best practices, this course allows learners to test the knowledge gained in our fulllength Global Anti-Bribery Compliance Training.

Learners participate in two interactive gaming sequences where they must evaluate various scenarios triggered by gifts and hospitality-related transactions.

- Recognize factors that influence compliance risk in gifts and hospitality practices
- Learn how to make decisions regarding which gifts and hospitality expenses are appropriate
- Understand how to avoid situations that could lead to violations of global anti-bribery laws





#### **Third Party Due Diligence**







10 LANGUAGES

Third party due diligence remains one of the greatest compliance challenges for most multinational organizations.

Simulating the most common scenarios and questions pertaining to third party due diligence, this course prompts the learner to apply a thoughtful approach to solving various third party screening challenges.

#### **Course Objectives:**

- Understand the basics of international anti-bribery laws and how third party due diligence fits into compliance with these laws
- Mitigate compliance risk in actual third party business interactions
- Learn how to make decisions regarding whether or not to investigate a third party further, given background circumstances





#### **Conflicts of Interest\***









Revisiting key concepts and definitions specific to conflicts of interest, this course explores real-life scenarios to provide learners with best practices and expert opinions on responding to potential conflict issues in various situations.

#### **Course Objectives:**

- Learn what a conflict of interest is
- Understand the various types of conflicts of interest
- Review examples of conflicts of interest
- Understand actions to take when faced with a situation involving a conflict of interest
- Consider how being aware of others' conflicts of interest standards can be helpful
- Explore how to respond to conflicts of interest in real-world scenarios





\*An earlier version of this course is available, "Compliance Refresher Series 1: Conflicts of Interest". To view the earlier version, write to training@TRACEinternational.org.

#### **Global Anti-Bribery Challenge**







05 LANGUAGES

In this course, the learner works through a real-life business case as a multinational company employee who is tasked with reviewing actions taken by employees and prospective third parties to determine if they are appropriate or raise a bribery risk to the organization. This course features several learner interactions, gaming components and knowledge checkpoints.

#### **Course Objectives:**

- Identify which acts/behavior constitute bribery based on global anti-bribery laws
- Recognize bribery in the real world and avoid potential problematic situations
- Understand the risks bribery poses to both organizations and individuals
- Be able to explain why ethical conduct is important and understand the pitfalls of unethical conduct





TRACE updates the "Anti-Bribery Challenge" full-length and refresher course every other year. There may be earlier versions still available for use on your platform. To learn more, write to training@TRACEinternational.org.

## Anti-Corruption (ACT) Regional Spotlights\*









Providing a brief overview of anti-bribery laws, regulations and enforcement trends in key countries in regions including Europe, Middle East and Africa EMEA), Asia Pacific and China (APAC), North America and Latin America (LATAM), this course can be deployed as one comprehensive module or 4 microlearning trainings.

#### **Course Objectives:**

Travel around the world to each region as you learn how key countries are combatting corruption, bribery, and unethical business practices as you explore the following topics:

- Recent legislative updates and bribery enforcement trends
- Anti-bribery compliance trends and red flags to look out for
- High risk industries ad notable risks faced by businesses operating locally
- Best practice recommendations for ensuring compliance on the ground in each region

#### **Regions Include:**

- APAC: China, India, Singapore, Japan
- EMEA:
  - **Europe:** France, Germany, the UK
  - Middle East: UAE, Saudi Arabia, Qatar
  - Africa: Nigeria, South Africa, Kenya
- North America: U.S., Canada
- Latin America: Brazil, Argentina, Mexico



To note each section includes

TRACE Bribery Risk Matrix Rankings
for all countries addressed in the section.





<sup>\*</sup>An earlier version of this course is available, "Compliance Refresher Series 2: Anti-Bribery Challenge Regional Spotlights". To view the earlier version, write to training@TRACEinternational.org.

## Microlearning

#### **MODULES**

Microlearning modules are designed to provide users with "bite-sized" information on specific compliance topics. Condensed into only a few minutes, these modules feature proven tips and insights shared by subject matter experts, offering learners guidance and best practice recommendations on various compliance topics.

#### **Compliance Hot Topics**\*

- ESG
- Occupational Health and Safety
- Speak Up

#### **Compliance Minutes**

- Bribery Mistakes
- Culture of Compliance
- FCPA Books and Records
- Sub-Agents and Sub-Distributors
- The #MeToo Era
- Training Fatigue

### Gifts & Hospitality Scenario Series - What Would You Do?

- Supplier Selection: Mixing Business with Personal
- State Government Soiree: Planning the Next Big Event
- Speaker Stipend: Evaluating an Offer
- Sporting Spectators: Gifting Cricket Tickets
- Charitable Choices: Considering a Donation

#### **Data Protection Series**

- Data Protection Essentials
- Managing Confidential Information

#### **Training Aids**

- Building a Compliance Training Program
- Red Flags: Watch Out for Signs of Trouble!

#### **Video Series**

- Bribe Busters Episode 1
- Bribe Busters Episode 2
- Bribe Busters Episode 3
- Bribery's Deadly Consequences
- Corruption Files The Advocate
- Corruption Files The Insider
- Corruption Files The Journalist
- Corruption Files The Watchdog
- Corruption Files The Whistleblower
- Defining a Foreign Official
- FIFA's Compliance Failures
- How to Say No Part One
- How to Say No Part Two
- Toxic Transactions

#### **Data Protection Series**



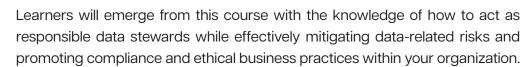
Data protection and privacy-related issues present one of the foremost risks faced by global organizations today given the often-personal nature and volume of data exchanged in day-to-day-business. Addressing key data protection topics, this two-part series tackles real-life issues employees of global organizations face on a day-to-day basis.

Deploy **Part One** to all employees to provide a reminder of key do's and don'ts when handling confidential and organizational data.

#### **Data Protection Essentials**



Designed to provide the learner with a foundational understanding of key data protection concepts and related topics, this course explores critical aspects of data security and privacy laws, including how to best handle confidential information, the diverse types of data governed by global regulations as well as the roles and responsibilities of various parties engaged in data management.









Utilize **Part Two** as a follow-on module for managers to reiterate key data health and safety points organizational leaders should ensure remain top of mind throughout the year.

#### **Managing Confidential Information**



Specifically designed for those in a managerial or leadership position, this course provides a brief introduction to the critical role managers play in ensuring the appropriate handling of confidential information and organizational data.

Learners will leave this course with practical tips for implementing proper data management and security practices across their team as well as suggestions for incorporating data-related points into employee training and awareness campaigns.





## **Compliance Minute Series**









These two-minute microlearning modules are based on episodes from TRACE's Podcast: *Bribe*, *Swindle or Steal* and provide users with practical takeaways addressing key compliance topics.

Bribery Mistakes	Learn what steps to take after a company discovers a bribe has been paid  FEATURING  Nathaniel Edmonds, Partner, DLA Piper		
Culture of Compliance	Learn how to create a culture of compliance within your organization  FEATURING Jonathan Drimmer, Partner, Steptoe		
FCPA Books and Records	Learn about risks associated with the books and records provision of the FCPA and tips for ensuring compliance  FEATURING Richard W. Grime, Partner, Gibson Dunn & Crutcher		
Sub-Agents and Sub-Distributors	Learn about the challenges associated with sub-agents and sub-distributors and steps to take to mitigate risk  William B.F. Steinman, Partner, Steinman & Rodgers		
The #MeToo Era	Learn about the evolution of the #MeToo Movement and compliance tips to reduce risk  FEATURING Misti Mukherjee, Managing Member, Extensio Law		
Training Fatigue	Learn three key tips to avoid compliance training fatigue  FEATURING  Karen Benson, Associate General Counsel, Global Ethics & Counsel, Energizer Holdings		

# Gifts & Hospitality Scenario Series What Would You Do?



An interactive five-part series that presents several scenarios raising possible issues involving gifts, hospitality, travel, or entertainment, the learner is challenged in each part to review the facts presented and then determine if the offer is appropriate.

This course can be deployed as one comprehensive module or five microlearning trainings.

#### **Course Objectives:**

Explore scenarios involving gifts, hospitality, travel and entertainment often occurring in day-to-day business with an eye towards understanding the proper decision to make when:

- Temped to mix business with pleasure
- Offering hospitality to customers/customer's spouses, including government officials
- Considering a request for or giving a donation
- Gifting sporting/event tickets to a current/ potential client
- Planning a corporate-sponsored event and offering a speaker stipend





### Topics (3 minutes each)

#### **Supplier Selection:**

**Mixing Business with Personal** 

#### **State Government Soiree:**

**Planning the Next Big Event** 

#### **Speaker Stipend:**

**Evaluating an Offer** 

#### **Sporting Spectators:**

**Gifting Cricket Tickets** 

#### **Charitable Choices:**

**Considering a Donation** 

#### **Training Aids**

Designed to provide "just in time" guidance for addressing real-life challenges, our training aids are concise modules offering easy to follow, step-by-step guidance for effectively addressing various anti-bribery compliance issues.

## **Building a Compliance Training Program**



Benefit from a step-by-step guide on how to build out a compliance training program



## Red Flags: Watch Out for Signs of Trouble!



Learn what a "red flag" is and steps to take if you think a red flag is present or could arise





#### **Videos Series**

The TRACE video series addresses a myriad of compliance topics, presented in an interactive and engaging format. Ranging from shorts, to hour long segments, these videos can be utilized as a training supplement or as an additional resource offered with a training rollout.

#### **Bribe Busters**



## FIFA's Compliance Failures



















An animated video series consisting of three 5-minute episodes, the series follows four friends who are students by day and international corruption fighters in their spare time.

This brief video explores FIFA's compliance failures over the last several decades, illustrating just how wrong things can go when an organization does not value good governance.

## Bribery's Deadly Consequences



How to Say No
(Part One\* & Part Two)













Leveraging real-life examples to emphasize the devastating consequences of even seemingly small bribes, this short video demonstrates the real-life impact of bribery on business and communities.

A two-part series offering employees and third parties practical strategies for deflecting requests for bribes and potentially inappropriate hospitality.

\*Part One of "How to Say No" is available in 9 languages.

## Defining a Foreign Official



#### **Toxic Transactions**



















Based on TRACE's highly-popular training aid, "Three Questions about the FCPA's Definition of a 'Foreign Official," this short video provides an indepth review of how the U.S. FCPA defines a "foreign official," highlighting relevant factors to consider and sharing guidance on how to consider potential "grey" areas in the definition.

Taking an in-depth look at the topics of bribery and extortion, this hour-long video explores the "high price of bad business" through lively and highly informative interviews with top anti-bribery experts from around the world as TRACE President, Alexandra Wrage narrates with commentary and a review of informative news stories.

#### **Corruption Files**











Created in honor of TRACE's 20th anniversary, Corruption Files delivers riveting firsthand reports from the frontlines against corruption and reveals the real personal impact of financial crime.

#### **The Advocate**

After reporting U.S.-sanctioned mining magnate Dan Gertler's alleged illicit financial network, two bank auditors-turned-whistleblowers came under threat and were sentenced to death in the Democratic Republic of the Congo. Gabriel Bourdon-Fattal with The Platform to Protect Whistleblowers in Africa tells their story.

#### The Insider

Johannes Stefansson alleged that the company he worked for paid bribes to gain access to Namibia's fishing grounds. Years later, he reflects on the Fishrot case—and his suspected poisoning.

#### The Journalist

Azerbaijani journalist Khadija Ismayilova found herself being blackmailed, thrown in prison and later placed on probation for simply doing her job: alleging corruption among the ruling family. In this episode of our Corruption Files series, Khadija tells her story.

#### The Watchdog

How did a U.S.-headquartered management consulting giant's venture in South Africa end with a public inquiry into the Zuma administration and millions of dollars in returned fees? Economist and political scientist William Gumede explains McKinsey's role in "the wasted decade."

#### The Whistleblower\*

A career civil servant-turned whistleblower in Spain found herself battling a nationwide political machine, facing death threats and hiding in a foreign country for years. This is Ana Garrido's story.

<sup>\*</sup>This episode is also available in Spanish.

## Compliance Games

3-10 minute gaming interactions designed to reinforce key concepts and add a dash of fun to compliance training.



#### **Anti-Bribery Compliance Road Map**

Prove your anti-bribery knowledge by safely navigating to the end of the road!



#### **Anti-Bribery Key Terms Flash Cards**

How well do you know anti-bribery compliance key terms? Practice what you know with this fun flashcard interaction.



## Anti-Bribery Key Terms Matching Game

Test your visual memory while reviewing key antibribery terms in this interactive matching exercise.



### Antitrust and Compliance Crossword Puzzle

Beat the clock to test your knowledge of key antitrust compliance terms by reviewing the clues to correctly complete the crossword puzzle.



#### **Assist to Resist Bribery Game**

Setup as a soccer match that relies on your compliance knowledge to successfully resist bribes, assist your team in figuring out the winning combination to score goals and win match! Answer a question correctly to setup the perfect assist to score a goal and possibly win the championship. Answer a question incorrectly and your team may miss their chance at a goal and the championship.



#### **Bribe Buster Game**

Match key bribery terms to the correct definition to become a "Bribe Buster."



#### **Bribe Destroyer**

Test your reflex *and* compliance skills. Have fun by preventing inappropriate gifts from entering your gift box.



#### Gifts & Hospitality Expense Proposal Game

Evaluate proposed expenses for various characters to determine permissible vs. inappropriate gifts and hospitality.



#### **Puzzled by Bribery**

Learn about the importance of standing firm against bribery while taking a short break with this fun, interactive sudoku challenge. Put your mathematical and decoding skills to the test to unlock the secret message at the end of the game.



#### Race Against the Clock to Speak Up!

Can you beat the clock in this fun interaction by answering the questions correctly before time runs out?



#### **Sniffing Out Business Conflicts**

Help Detective Mojo as he sniffs out potential business conflicts for his human owner! Can you spot the conflict before it happens?



## TRACEing the Steps of an Investigation

Test your knowledge of best practice procedures during an investigation by putting the steps of an investigation in the correct order.



## TRACE Third Party Compliance Risk Road Map

Prove your knowledge of anti-bribery third party risks by safely navigating to the end of the road.



#### What Happens in Vegas

Don't "gamble" on corrupt business practices! Learn how to evaluate risks presented in common real-world scenarios during this Vegas strip simulation game.



### What Kind of Compliance Dog are You? Quiz

Curious to know what type of compliance dog you are? Take a short quiz to learn your "breed."



#### Would You Risk It?\*

Presenting various scenarios based on facts involving the trade of goods or technology, test your knowledge to select the best choice. Each time you select the correct answer, you'll be awarded a badge and 10 points. Collect all the badges and accumulate maximum points to win the game.

#### SUPPLEMENTARY

## **Compliance Materials**

Our supplementary compliance materials can help enhance your compliance program and reinforce the lessons learned from online training throughout the year. These materials are available in other select languages and can be translated in any language upon request.

#### **Training Aids**

- A Gift or a Bribe?
- Accounting Red Flags to Watch Out For
- Anti-Money Laundering Risk and Compliance Tips for Day to Day Business Operations
- Can a Charitable Donation Be a Bribe?
- Combatting Forced Labor and Human Trafficking
- Communication Skills for Success
- Compliance STAR
- Data Governance Tips
- Do's and Don'ts of Addressing Internal Reports
- Encouraging Employees to Report Misconduct
- ESG & You
- Forced Labor Red Flags

- Managing Third Party ESG Risk
- Red Flags: Watch Out for Signs of Trouble!
- Reduce Your ESG Risk Profile
- Resisting Bribery
- Responding to Bribe Demands
- Say No to Bribes
- Shades of Red How to Mitigate Red Flags
- Speak Up, Listen Up, and Don't Give Up
- The Basics of Anti-Corruption Compliance Training
- Three Questions About Foreign Officials
- What is a Conflict of Interest?

#### **Guides**

- Anti-Corruption Compliance and Third Party Intermediaries
- Anti-Corruption Compliance Starter Kit
- Assessing Third Party Risk
- Compliance Event Toolkit
- Conflict of Interest Mitigation Plan Guidance
- Forced Labor and Human Trafficking
- Guide to Compliant Hiring Practices
- Guide to Hosting Events
- Guide to Internal Reporting Programs

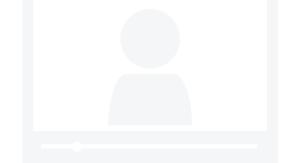
- Guide to Setting a Tone at the Top
- Guide to Trips and Visits for Foreign Officials
- Human Rights Due Diligence Reporting
- The Compliance Officer's Guide to Innovative Training
- The Varieties of Transnational Anti-Bribery Laws
- Three Dilemmas for Gifts Hospitality Policies
- What Happens in Vegas
- What to Know About Sanctions

#### **Mini Guides**

- Five Elements of a Sanctions Compliance Program
- Four Ways to Improve Your Ethics & Compliance Training
- How to Conduct an Effective Corruption Risk Assessment
- Key Red Flags that Could Indicate Bribery Risk

#### PRE-RECORDED

## Webinars



The TRACE Resource Center, available only to members, includes more than 200 hours of pre-recorded webinars. Webinars cover a broad range of anti-bribery issues, including compliance program and risk management, due diligence and anti-bribery fundamentals, industry and region specific challenges, and global regulatory and enforcement trends.

Additional topics addressed by TRACE webinars include data privacy, antitrust and competition law, compliance training innovation, and business risk and audit.

- From the Frontline: Exploring the Current State of Corporate Governance
- Doing Business in Ukraine: A Compliance Perspective
- Embed Compliance Controls throughout your Organization
- FCPA Enforcement Year in Review
- "Hot Button" Sanctions Issues
- Launching a Global Compliance Ambassador Program

- Pivots in Compliance Training Approaches
- Spotlight on Joint Ventures: Anti-Bribery Compliance Considerations
- The Tension between Data Privacy and Anti-Corruption Compliance
- Trade Compliance: How to Navigate the Complexities of Trade & Exports

The webinars listed above are a small sample of the hundreds of pre-recorded webinar available in the TRACE Resource Center. Live webinars on current compliance issues are held regularly throughout the year and are added to our library of recorded courses.

To learn more, visit www.TRACEinternational.org/webinars.

#### **TRACE eLearning Rollout**

- A strategy call is scheduled to gain an understanding of your compliance training needs, including who will be receiving the training, course preferences, training deadlines and other requirements.
- Following the strategy call, a live, interactive meeting with your designated training administrator(s) is scheduled to review the portal in real time and address any additional questions your team may have.
- Once trained, your administrator(s) will be able to add users to your training site, assign courses and update course enrollments.

- The TRACE LMS is able to do a batch upload of users via an Excel spreadsheet (uploaded as a CSV file) that includes additional user information, including termination date, country, title and department.
- Should you prefer to use your LMS for the offthe-shelf TRACE courses, TRACE will provide you with SCORM files. Custom courses can be created as a SCORM 2004 or 1.2. TRACE will not be responsible for any troubleshooting if you choose to house the content on your LMS.

#### **User System Requirements**

Supported Devices*	Supported Operating Systems	Supported Browsers		
Desktops/Laptops				
PCs, laptops	Windows 7, 8, 10, 11	Edge, Chrome, Safari and Firefox (latest versions)		
Tablets & Mobile Devices	Mobile Operating Systems			
iPad	iOS 12 (or higher)	Mobile Safari		
Nexus	Android 8.0 (or higher)	Chrome		
Lenovo Flex 15	-	Edge		
Galaxy S7	_	-		

<sup>\*</sup>Special accommodations available for training users in countries where the app is not available or users with limited or no internet access. For more information on available options, email training@TRACEinternational.org.

### **Training Benefits Included with TRACE Membership**

#### **Included with Your TRACE Membership**

- Unlimited access to TRACE LMS and all courses
- Onboarding and technical support
- One LMS account/training site
- Administrator registration or user self-registration
- **Training Site/Homepage customizations**
- **Basic TRACE course customizations**
- Mobile accessibility
- Complimentary TRACEpro enrollments\*

Customizations				
Training Site / Homepage	Basic Course <sup>*¶</sup>			
<ul> <li>Widget updates</li> <li>API</li> <li>Course editing feature for up to 1 Power User</li> <li>Automated recurring course enrollments (Up to 4)</li> <li>Automated recurring emails (Up to 4)*</li> <li>Automated custom reports</li> <li>Access to LMS Gamification feature (allows member to use TRACE course completion badge)</li> <li>Access to LMS Teams &amp; Managers Feature</li> </ul>	<ul> <li>Company logo added to top course banner</li> <li>Addition of Company Policies to course resources</li> <li>Addition of 1 Company-Specific slide per TRACE course (e.g. Adding a custom welcome or closing message slide to a course, adding a slide that discusses a company's specific procedure, etc.)§</li> </ul>			

Additional customizations may be available based on your membership agreement or via the purchase of a training package.

To view all course customizations available to TRACE members, please review our **TRACE Membership Course Customization Look Book.** 

Standard members receive 5 complimentary TRACEpro seats and Enterprise members receive 10 seats \*Translations to be provided by members

<sup>¶</sup>All basic customizations are available in up to 4 languages

#### **TRACE**

## **Training Packages**

	TIER 1	TIER 2	TIER 3
	US\$8,000	US\$15,000	US\$30,000
LMS Customizations			
Single Sign On	included	included	included
Custom Course Certificates (1 per course)	included	included	included
Content Management (Host Non-TRACE courses on LMS)	up to 10 courses■	up to 20 courses■	up to 40 courses■
Custom Email Notifications/Reminders (4 are included with membership)	1 additional	6 additional	16 additional
Custom TRACE LMS language wrapper menus*	up to 4	up to 8	up to 12
Custom LMS data fields	up to 2	up to 3	up to 5
LMS Power User Upgraded Functionality Features <sup>¶</sup>	1 PU feature	2 PU feature	4 PU feature
Dedicated Rollout Support (rollout per year)§	up to 2	up to 4	ongoing
Additional LMS Training Site Instance (includes basic customizations)	up to 1 additional	up to 2 additional	up to 3 additional
Custom course survey/quiz deployed via TRACE LMS (up to 25 questions per survey/quiz; must be compliance-related and cannot be due diligence deployed to third parties)	1	2	4

One course in a single language counts as one "course" - the same course in an additional language will count as a second course (Company must provide all translations)

<sup>\*</sup>Limited to core TRACE languages and available TRACE courses

<sup>&</sup>lt;sup>¶</sup>Upgraded functionality for TRACE LMS Power Users includes access to custom Insights dashboards, groups, newsletters, channels, learning plans and observational checklists

<sup>§</sup>Dedicated rollout support includes creation of user accounts, course enrollments, and report creation/scheduling

	TIER 1	TIER 2	TIER 3
Course Customizations			
Member internal LMS course wrappers	up to 4 wrappers total (4 languages per course)	up to 8 wrappers total (8 languages per course)	up to 12 wrappers total (12 languages per course)
Basic Course Customizations in additional languages (beyond the 4 core)	up to 5 additional languages	up to 10 additional languages	up to 20 additional languages
Basic Course Customizations for additional courses (in up to 4 languages)	up to 5 additional courses	up to 10 additional courses	up to 20 additional courses
Full customization of a TRACE course (in up to 4 languages)	not included	up to 1 course	up to 2 courses■
Creation of custom code of conduct course using TRACE template*	up to 1 language	up to 2 languages	up to 4 languages
Update of custom code of conduct course using TRACE template§	up to 1 language	up to 2 languages	up to 4 languages
Creation of one custom member training course (compliance-related topics only) <sup>±</sup>	not included	not included	up to 4 languages
A customizable tier that allows for an assortment of package components and			

TIER 4 | + US\$40.000

A customizable tier that allows for an assortment of package components and customizations that are tailored to your company's needs. To discuss a custom tier 4 package for your company, please reach out to <a href="mailto:nreyesleon@TRACEinternational.org">nreyesleon@TRACEinternational.org</a>.

**All translations to be provided by the member.** If a member requests additional substantive edits after final approval of any customization/project under the member's package, TRACE will assess a fee of US\$1,000 for each additional round of edits requested.

Not seeing the specific customization you have in mind? Please reach out to the TRACE compliance training team at training@TRACEinternational.org to further discuss.

<sup>\*</sup>One course in a single language counts as one "course" - the same course in an additional language will count as a second course (Company must provide all translations)

<sup>§</sup>Includes modification of up to 5 slides, up to 5 minutes of voiceover, updates to all policies included in the course, as requested

<sup>&</sup>lt;sup>±</sup>Includes up to 30 slides, up to 15 minutes of voiceover, and inclusion of up to 10 policies, as well as 1 gaming interaction and 1 quiz with a max of 10 questions. Company must provide all course content



TRACE is a non-profit international business association dedicated to anti-bribery, compliance and good governance. Founded in 2001 to make it easier and less expensive to navigate and mitigate business bribery risk, TRACE is credited with establishing anti-bribery standards that have been adopted worldwide. Driven by the needs of its members, TRACE is continuously developing tools and resources that power compliance programs. TRACE is headquartered in the United States and registered in Canada, with a presence on four continents.







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