eLearning



Award-winning eLearning

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



One 2024 GOLD Human Capital Management (HCM) Excellence Learning and Development Award in the Best Unique or Innovative Learning and Development Program category for our Compliance Life Cycle Learning Plan.

One 2024 SILVER Human Capital Management (HCM) Excellence Learning and Development Award in the Best Association Professional Development Program category for our TRACEpro program.



One 2023 GOLD Technology Excellence Learning and Development Technology Award in the Best Advance in Learning Management Technology for Compliance Training category for our TRACE Learning Management System (LMS).

One 2023 GOLD Human Capital Management (HCM) Excellence Learning and Development Award in the Best Advance in Compliance Training category, for our latest anti-bribery compliance eLearning module, "Mission Possible."

One 2023 SILVER Human Capital Management (HCM) Excellence Learning and Development Award in the Best Learning Team category.

Table of Contents

About TRACE elearning	1
Hosting, Administering and Managing Training	2
TRACE eLearning Resources	3
Full-Length Courses	4
Refresher Courses	16
Microlearning	21
Compliance Hot Topics	22
Compliance Minute Series	23
Training Aids	24
Videos Series	25
Compliance Games	27
Supplementary Compliance Materials	30
Pre-recorded Webinars	31
TRACE eLearning Rollout	32
User System Requirements	32
Training Benefits Included with TRACE Membership	33
TRACE Training Packages	34

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:

- 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.



Reduce Risk



Raise Awareness



Reinforce Compliance

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 here.

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 and SSO connections
- 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 selfselection*

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 data 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.

^{*}See our TRACE Training Packages Info Sheet to learn more.

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



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



Hundreds of webinars covering a wide variety of compliance topics



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



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



10 complimentary TRACEpro enrollments

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

TRACE eLearning core languages* are English, Chinese (Simplified), French, German, Japanese, Portuguese and Spanish. 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.

^{*}All TRACE courses in our core languages are compliant with WCAG 2.1 Level AA 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.

TRACE 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
- UK Criminal Finances Act

TRACE 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 1 & Part 2)
- U.S. Trade and Export Controls

TRACE Compliance Series 3

- Global Anti-Corruption Overview
- Mission Possible Busting Bribery

TRACE Compliance Supplement Series

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

TRACE Ethics Series 1

Sexual Harassment Prevention

TRACE Ethics Series 2

Respect in the Workplace

To view the earlier versions, email the TRACE Compliance Training team at training@TRACEinternational.org.

^{*}An earlier version of this course is available, "TRACE Compliance Series 1: Anti-Money Laundering."

^{**}An earlier version of this course is available, "TRACE Compliance Series 1: Avoiding Trafficked Labor."

^{***}An earlier version of this course is available, "TRACE Compliance Series 1: Conflict Minerals."

Anti-Bribery Challenge

(Employee and Third Party Versions)*







12 LANGUAGES

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





*Employee version of "Anti-Bribery Challenge" is available in 17 languages.

Anti-Bribery for Shipping and Logistics







18 LANGUAGES

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"





Data Protection & Privacy







09 LANGUAGES

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 will equip 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
LANGUAGES

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









Insider Trading









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
Autiture and competition law is primarily focused on identifying the line between
Superson competition and autocompetitive or predutery conduct that reduces competition to
the detriment of consumers.

Cikk on each image below to learn more about the purpose of this body of loss.







Guided through the course by a narrator posed as a member of a corporate compliance team, learners will 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 several years now with its impact being felt across a multitude of sectors and practice areas. Corporate anti-corruption efforts and personal data protection are 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.

During 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 anti-bribery 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





UK Criminal Finances Act







04 LANGUAGES

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.

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.

- 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

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.

Course Objectives:

- 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





*Employee version of "Anti-Corruption Training (ACT)" is available in 21 languages.

Anti-Money Laundering*







07
LANGUAGES

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 antimoney 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, "TRACE Compliance Series 1: Anti-Money Laundering." To view the earlier version, email the TRACE Compliance Training team at training@TRACEinternational.org.

Forced Labor & Human Trafficking*







16 LANGUAGES

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 will explore 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, "TRACE Compliance Series 1: Avoiding Trafficked Labor." To view the earlier version, email the TRACE Compliance Training team at training@TRACEinternational.org.

Global Conflict Minerals Regulation*

ALL LEARNERS TOUL COURSE LANGUAGES LANGUAGES

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, "TRACE Compliance Series 1: Conflict Minerals." To view the earlier version, email the TRACE Compliance Training team at training@TRACEinternational.org.

Sanctions Compliance

(Part 1 & Part 2)



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 will 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 1 and 2.

Course Objectives:

Part 1:

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

Part 2:

- 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 will 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 your 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







07
LANGUAGES

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 will explore the latest trends in global anti-bribery compliance and how to spot 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 her 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 throughout the course, 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 anti-bribery 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)







07
LANGUAGE

Offered as part of TRACE's Compliance Companion series, this course has been specifically crafted for compliance and legal professionals and business leadership as a companion module to TRACE's Forced Labor & Human Trafficking course.

Developed for a management level audience, this course provides a top-level overview of key points and issues relevant to forced labor and human trafficking with a goal of raising awareness and highlighting topics any leader in the global business field today should be aware of.

- 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, 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



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.

Course Objectives:

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



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.

TRACE Compliance Refresher Series 1

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

TRACE Compliance Refresher Series 2

Conflicts of Interest*

TRACE Compliance Refresher Series 3

- Global Anti-Bribery Challenge
- Anti-Corruption (ACT) Regional 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

** An earlier version of this course is available, "TRACE Compliance Refresher Series 2: Anti-Bribery Challenge Regional Spotlights."

To view the earlier version, email the TRACE Compliance Training team at **training@TRACEinternational.org**.

^{*} An earlier version of this course is available, "TRACE Compliance Refresher Series 2: Conflicts of Interest."

TRACE Compliance Refresher Series 1

Anti-Bribery

(Employee and Third Party Versions)*







04 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





*Employee version of "Anti-Bribery" is available in 7 languages.

Gifts & Hospitality







10 LANGUAGES

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 antibribery 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*







08 LANGUAGES

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, "TRACE Compliance Refresher Series 1: Conflicts of Interest." To view the earlier version, email the TRACE Compliance Training team at training@TRACEinternational.org.

Global Anti-Bribery Challenge







05 LANGUAGE

In this course, the learner works through a real-life business case as a multinational company employee who is tasked with reviewing the 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 full-length and refresher course every other year, and 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







07

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

To note each section includes **TRACE Bribery Risk Matrix Rankings** for all countries addressed in the section.

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



*An earlier version of this course is available,

"TRACE Compliance Refresher Series 2: Anti-Bribery Challenge Regional Spotlights." To view the earlier version, email the TRACE Compliance Training team at training@TRACEinternational.org.

Microlearning MODULES

Microlearning modules are designed to provide users with "bite-sized" compliance information during a time of growing online training fatigue. Condensed into only a few minutes, these modules feature subject matter experts who offer learners guidance and best practice recommendations on various compliance topics.

Compliance Hot Topics*

- ESG
- Occupational Health and Safety
- Speak Up

Compliance Minutes Series

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

Training Aids

- Building a Compliance Training Program
- Red Flags To Watch Out For

Video Series

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

^{*}English version of each course available as one combined module.

Compliance Hot Topics*







Addressing current compliance "hot" topics trends, these short modules tackle top of mind topics global compliance officers face on a day-to-day basis. Deploy these modules as part of your an annual compliance training, or as stand-alone refresher course.

ESG

With increased consumer, investor and regulatory attention on environmental, social and governance (ESG) factors, it's everyone's responsibility to ensure the company is doing business ethically and in compliance with applicable laws. In this module, you will learn what ESG is, how ESG impacts the world, ESG red flags to look out for and how you can help your company conduct business ethically and transparently.



Occupational Health and Safety

In the post-COVID, hybrid work landscape, ethical organizations support their colleagues' and employees' physical safety and psychosocial health. Through this module, you will learn practical steps to advocate for a balanced, mindful approach to working in this newly fluid stage, where respecting every colleague's approach to wellness is more crucial than ever.



Speak Up

Good corporate custodians are committed to maintaining internal procedures that encourage employees to cite and report ethical violations. In this module, you will learn how to apply specific skills to recognize bribery in the real world and become a confident "whistleblower."



^{*}English version of each course available as one combined module.

Compliance Minute Series









These two-minute microlearning modules are based on episodes from TRACE's Podcast: *Bribe, Swindle or Steal* and provide users with "bite-sized" compliance information.

Bribery Mistakes	Learn what steps to take after a company discovers a bribe has been paid Featuring: Nathaniel Edmonds, <i>Partner, Litigation Department</i> , Paul Hastings
Culture of Compliance	Learn how to create a culture of compliance within your organization Featuring: Jonathan Drimmer, <i>Partner</i> , Litigation Department, Paul Hastings
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, <i>Partner</i> , 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 Featuring: William B.F. Steinman, <i>Partner</i> , 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, Senior Counsel, Global Compliance Risk Management, Energizer Holdings

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 To Watch Out For



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











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.

Bribery's Deadly Consequences











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.

Defining a Foreign Official











Based on TRACE's highly-popular training aid, "Three Questions about the FCPA's Definition of a 'Foreign Official," this short video provides an in-depth 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.

FIFA's Compliance Failures











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.

How to Say No (Part 1* & Part 2)











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

^{*}Part 1 of **"How to Say No"** is available in 9 languages.

Toxic Transactions









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. This video is appropriate for employees at all levels.



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 epsiode 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.

*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 knowledge to navigate safely to the end of the road!



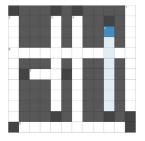
Anti-Bribery Key Terms Flash Cards

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 anti-bribery terms in this interactive matching exercise.



Antitrust and Compliance Crossword Puzzle

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



Bribe Buster Game

Match key bribery terms to the correct definition to win the "Bribe Buster" badge.



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.



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 procedure by putting the steps of an investigation in the correct order.



TRACE Third Party Compliance Risk Road Map

Prove your knowledge of 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

Take a short quiz to learn more about your "breed" of compliance.



Would You Risk It?

You will be presented with a few scenario-based questions. For each question, you will be presented with 2 answer choices. Carefully select your answer based on your knowledge of the topics covered. 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.

*This game is also available in Chinese (Simplified), French, German, Italian, Portuguese and Spanish.

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
- Can a Charitable Donation be a Bribe?
- Compliance Event Toolkit
- Compliance STAR Poster
- Do's and Don'ts of Addressing Internal Reports
- Encouraging Employees to Report Misconduct
- ESG & You
- Forced Labor Red Flags
- · Guide to Setting a Tone at the Top

- · Human Rights Due Diligence Reporting
- · Managing Third Party ESG Risk
- Red Flags: Watch Out for Signs of Trouble!
- · Resisting Bribery
- · Responding to Bribe Demands
- Shades of Red: How to Mitigate Red Flags
- Speak Up, Listen Up, and Don't Give Up
- · Three Questions About Foreign Officials
- What Happens in Vegas
- What is a Conflict of Interest?

TRACE Guides

- Anti-Corruption Compliance and Third Party Intermediaries
- Assessing Third Party Risk
- The Compliance Officer's Guide to Innovative Training
- Three Dilemmas for Gifts Hospitality Policies and How to Solve Them
- 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.

- FCPA Enforcement Year in Review
- "Hot Button" Sanctions Issues
- Launching a Global Compliance Ambassador Program

 The Tension between Data Privacy and Anti-Corruption Compliance

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'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.

Senior Director of Legal Services & Governance, The Cooper Companies

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	_	_	

^{*}Special accommodations available for training users with limited or no internet access. Please email the TRACE training team at training@TRACEinternational.org for more information on available options.

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
- 10 complimentary TRACEpro enrollments
- · Conflicts of Interest (COI) Tracker

Customizations			
Training Site / Homepage	Basic Course*	COI Tracker	
 Widget updates SSO and API Automated recurring course enrollments (Up to 4) Automated recurring emails (Training and COI Tracker) (Up to 4 each)* Automated custom reports Gamification Teams/Managers 	 Company logo added to course top banner Custom "Welcome" and "Closing" message/screen Addition of company policies to course resources Removal/modification of slides in TRACE course(s) (less than 5 slides)** 	 Up to 3 languages/form Custom COI Certificate*** Company logo, widgets, buttons added to homepage and COI tracker launch page Two instructional guides (user/admin)*** One Custom Power User profile 	

Additional benefits/customizations may be added as made available.

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

***Available for up to 3 languages per course/form. For customizations to more than 3 languages/course/form see training packages on the next page

^{*}Translations to be provided by members

^{**}Excluding audio updates

TRACE Training Packages

Additional benefits/customizations may be added as made available. Benefits shown in the chart below and on the next page are subject to change. Quantities are flexible and based on member-specific needs. Not seeing the specific customization you have in mind? Please contact the **TRACE Compliance Training Team** to further discuss.

	TIER 1	TIER 2	TIER 3
LMS Customizations			
Creation of a member-specific training guide for the LMS	Х	X	Х
Custom course certificates (1 per course)	X	X	X
Custom eLearning badges (1 per course)	X	X	X
Content management (hosting of non-TRACE courses on the LMS, by # of courses)	10	20	40
Custom email notifications/reminders (up to 4 included with membership)	Up to 5	Up to 10	Up to 20
Custom TRACE LMS language wrapper menus *	3	6	Unlimited
Custom data fields (LMS)	Up to 2	Up to 3	Up to 5
Custom course survey/quiz deployed through TRACE LMS (up to 50 questions per survey/quiz)	1	3	5
Dedicated rollout support (rollout per year) **	1	2	Ongoing
Choice of upgraded functionality for TRACE LMS Power User [†]	1 PU feature	Up to 3 PU features	Up to 5 PU features
Additional instance/training site on the LMS		1	2
Dedicated LMS account manager			Х

Course Customizations

Member Internal LMS Course Wrappers ^{††}	Up to 6 languages/ course	Up to 15 languages/course	All languages/ courses
Basic customizations (up to 3 languages/course included with membership)	Up to 6 languages/ course	Up to 15 languages/course	All languages/ courses
Custom policy/code of conduct course updates ¶	Up to 2 courses ^{¶¶}	Up to 5 courses ¶¶	Up to 10 courses ¶¶
Custom policy/code of conduct course creation §		Up to 2 courses §	Up to 4 courses §
Full customization of a TRACE course		Up to 5 languages	Up to 10 languages
Creation of custom member training course (compliance-related topics only) §§			1
Creation of custom gaming interaction/avatars for course			X

	TIER 1	TIER 2	TIER 3
COI Tracker (All translations to be provided by mem	nber)		
Number of forms (one language per form)	Up to 6 forms/ languages	Up to 12 forms/ languages	Unlimited
Custom email notifications (up to 4 included with membership)	Up to 6	Up to 12	Unlimited
Custom completion certificates	Up to 2	Up to 4	Up to 10
Additional custom instructional guides	1	Up to 2	Up to 5
Dedicated launch support (per year)	1	2	Unlimited
Additional Power User profiles	Up to 2	Up to 3	Up to 4
Custom data fields	-	1	2
Custom survey (for gathering feedback)	X	X	X
Additional Benefits			
Utilization of pre-recorded TRACE webinars as training material on the TRACE or Internal LMS (Mp4 or SCORM)	Up to 5	Up to 10	Up to 15
Additional TRACEpro enrollments (10 included with membership)	Up to 25	Up to 75	Up to 150
45-minute strategy call with a senior TRACE representative (not legal advice)			Х
Senior-level TRACE representative to speak at member event virtually (upon request, and subject to availability, in-person may be possible, but Company to fund travel-related expenses)			Up to 2
All translations to be provided by member.		Pricing (per year	ar)
If a member requests additional substantive edits after	+ US\$4,000	+ US\$10,000	+ US\$20,000

If a member requests additional substantive edits after final approval of any customization/project hereunder, TRACE will assess a fee of US1,000\$ for each additional round of edits requested.

Pricing (per year)		
+ US\$4,000	+ US\$10,000	+ US\$20,000

All benefits shown are subject to change. Quantities are flexible and based on member-specific needs.

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.

^{*}No language limitation. Limited to available TRACE courses

^{**}Dedicated rollout support includes creation of user accounts, course enrollments, report creation/scheduling

[†] Upgraded functionality for TRACE LMS Power Users includes LMS course editing, access to groups, newsletters, channels, learning plans and observational checklists

^{††}Limited to member internal LMS size

Modification of up to five slides, up to five mins of voice over, updates to all policies included in the course as requested

[¶]One course in a single language counts as one course, the same course in an additional language will count as a 2nd course (all translations to be provided by member)

[§]Up to 30 slides, up to 15 mins of voice over, inclusion of up to 10 policies

^{§§}One language, up to 30 slides, up to 15 mins of voice over, inclusion of up to 10 policies, one gaming interaction, one guiz up to 10 questions (member to 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.

Follow us on: in 🗶 🖸







For more information:



+1 410.990.0076



training@TRACEinternational.org



www.TRACEinternational.org



151 West Street, Annapolis, MD, USA 21401