Advanced investigations in multi-national companies

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Agenda

- Introduction
- Internal Or External Resources?
- Investigative Steps
- Potential Issues & Critical Success Factors
- The Tech Data Perspective
Publicly traded
TECD (Nasdaq)

#88 on the FORTUNE 500

$37.2B in sales for Fiscal 2019

Operations in
40+ countries

125,000+ customers

Portfolio of
150,000+ IT products

100+ countries served

14,000+ colleagues worldwide

One of FORTUNE’s “World’s Most Admired Companies”

A Global Partner with Local Expertise

SUPPORTING PARTNERS AROUND THE WORLD

Americas
6,000 colleagues
45% of sales
ARGENTINA | BRAZIL | CANADA
CHILE | COLOMBIA | COSTA RICA
ECUADOR | MEXICO | PERU
UNITED STATES

Europe
7,000 colleagues
51% of sales

Asia Pacific
1,000 colleagues
4% of sales
AUSTRALIA | INDIA | INDONESIA | NEW ZEALAND | SINGAPORE | THAILAND | VIETNAM | MALAYSIA

AUSTRIA | BELGIUM | BULGARIA | CROATIA
CZECH REPUBLIC | DENMARK | FINLAND | FRANCE
GERMANY | HUNGARY | IRELAND | ITALY | LUXEMBOURG
NETHERLANDS | NORWAY | POLAND | PORTUGAL | ROMANIA
SERBIA | SLOVAKIA | SLOVENIA | SPAIN | SWEDEN
SWITZERLAND | TURKEY | UNITED KINGDOM
The investigation team - Questions

- Need to report to the regulator?
- What is the nature of the allegations?
- What skills are needed to complete the investigation?
- Expertise & sector knowledge?
- Where do you find the resources – internally or is external support needed?

**Required Skills**

- Language requirements
- Interview skills and experience
- Legal knowledge: local laws and rules of evidence and practice of enforcement authorities
- IT - Forensics
- Sector specific knowledge
- Area of expertise

**Availability, skills and independence of internal resources**

- Legal
- Ethics & Compliance
- HR
- Security (IT Security and Corporate Security)
- Internal Audit
- Controlling & Finance
- Operations
## Internal Functions

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<td>Deep knowledge of the systems and the operations. Able to review results from previous audits.</td>
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## Resources

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### Points to consider

- Knowledge of the organization, the people and the culture
- Costs
- Trust
- Availability
- Language skills
- Forensics skills
- Conflicts of interest/Bias/Maintaining confidentiality

- Independence
- Experience
- Attorney-Client Privilege
- Ability to represent the company in potential criminal/civil/employment court proceedings
**INVESTIGATIVE STEPS**

**PREPARATION**
- Preliminary analysis of allegations
- Informing stakeholders
- Case plan, including goals
- Budget & timing

**DATA COLLECTION**

**DATA ANALYSIS**

**DETERMINATION OF DISCIPLINE**

**REPORTING**

**INTERVIEWS**

**LESSONS LEARNED**
DATA COLLECTION

INVESTIGATIVE STEPS

- Multiple sources of data
- Data Privacy
- Communication
- Maintaining confidentiality
- Gathering of available documents & data
- Selection of data and documents to be collected

DATA ANALYSIS

INVESTIGATIVE STEPS

- Identify and analyze gaps
- Maintain chain of custody
- Ensure data privacy requirements are met
- Email/electronic data – special tools used
- Other
INVESTIGATIVE STEPS

INTERVIEWS

- Strategy and sequence
- Location and team
- Other

REPORTING

- Reporting to management and the Board
- Reporting to regulator
- Form
DETERMINATION OF DISCIPLINE

- Local legal framework
- Disciplinary decisions
- Potential cases against employees and third parties

LESSONS LEARNED

- Changes to procedures and processes based on findings
- Share "lessons learned" with employees
- Communication
Potential issues

**EVIDENCE**
- Direct evidence not always available
- Destruction of information by employees involved

**INVolVEMENT OF EMPLOYEES**
- Large scale
- Fear of witnesses to cooperate

**LAWS**
- Local laws
- Works councils

**DATA**
- Availability and access to data

CRITICAL SUCCESS FACTORS

**LEADERS**
- TONE FROM THE TOP

**MANAGERS**
- MOOD IN THE MIDDLE

**CREATe AN ETHICAL & COMPLIANT CULTURE IN WHICH EMPLOYEES FEEL FREE TO SPEAK UP**

**REPORTING OPTIONS**
- Manager or anyone on the management team
- Ethics & Compliance Department
- Ethics Advisors
- HR, Legal, Ethics Line
130+ Ethics Advisors Around the World

We are:
- A knowledgeable source of information and guidance for all Tech Data policies
- Here to support you with information and training
- Here to make sure your voice is heard

We are not:
- Training enforcers
- Investigators

Questions?