COMPLIANCE OFFICER’S GUIDE

TABLE OF CONTENTS

CREATING YOUR COMPLIANCE TEAM (Alissa)

1. A Culture of Compliance Across All Corporate Departments—compliance officer has clear lines of communication to C Suite, Board, etc.
2. Creating & reinforcing core values for your Compliance team
3. Choosing the right roles and reporting structure
4. Establishing key relationships with other corporate teams who support independent distributors
5. Risk assessment for company of what highest risk is.

ESTABLISHING POLICIES & PROCEDURES ALONG WITH STANDARDS OF CONDUCT (Jemima)

1. Creating written policies & procedures to define your company standards with corporate executives and independent distributors
   1. Guidelines for properly marketing the compensation model
   2. Establishing proper product and earnings claims and designing appropriate disclaimers for corporate and field use
   3. Addressing standards for enrollment, sales and money-back guarantee
   4. Types of Penalties—hold commission payment, termination/suspension, etc. Does the penalty fit the crime. Schedules of penalties.

INTERNAL & EXTERNAL TRAINING AND EDUCATION (Dan)

1. Creating training materials for corporate team members at all levels of responsibility
2. Creating training materials for your field that are customizable by market

EFFECTIVE COMMUNICATION (Rena)

1. Maintaining clear and nimble lines of communication
2. Approaching your field with partnership and compassion
3. Demonstrating the benefits of proactive communication between Compliance and distributors with partnership and compassion
4. Engaging regularly with field leadership
5. Roles in internal field communication

MONITORING & AUDITING YOUR FIELD (Steve/Brian)

1. Maintaining clear and nimble lines of communication
2. Engaging internal and third-party resources for ongoing monitoring of social media content.
3. Monitoring sales patterns for manipulation of compensation
4. Encouraging your distributors to communicate about compliance concerns: Investigation and Recordkeeping
5. Establishing relationships with industry resources to demonstrate the company’s commitment to best practices (DSA, DSSRC, BBB, etc.)

REPORTING AND INVESTIGATIONS (Steve/Brian)

1. Maintaining accurate record keeping validating the enforcement of your policies.
2. Establishing investigatory standards to ensure consistent application within the field ensuring equal treatment to all distributors regardless of rank.