



CUSTOM COMPLIANCE TRAINING

TDI was engaged by a global aviation and hospitality firm to investigate a whistleblower allegation relating to the firm's operations in several emerging markets. Our team worked closely with the firm's executive leadership, general counsel, internal auditors, and local country managers. The investigative efforts spanned multiple countries in Africa and South America. The scope of our services included assessing key elements of the client's existing compliance program, conducting anti-corruption and business ethics training with senior leadership, investigating allegations of commercial fraud and corruption, conducting due diligence on key third party suppliers, and participating in on-site audits.

We developed industry and site specific compliance training materials and presentations that were delivered in-person by a TDI partner to help reinforce the client's compliance culture. We worked with senior leadership on developing key strategies that were aligned with local business practices and cultural norms to promote the firm's commitment to business ethics and compliance. The TDI investigation team also assisted the client's auditing teams in redesigning compliance internal controls and processes to reduce business risks.

Additionally, we designed a programmatic, risk based due diligence program for the client's procurement and supply chain operations. The program and related due diligence reporting captured critical nuances associated with the aviation and hospitality sectors. Our due diligence efforts identified several instances of ultimate beneficial ownership issues that represented significant conflicts of interests between the firm's representatives and contracted third parties. Our team also pinpointed several instances of monopolistic risks within local supply chains and the presence of politically-exposed-persons (PEPs) within several third parties. The collective information obtained from open-source research and confidential human source inquiries, combined with our global compliance experience and cultural insights, allowed the client to reposition their compliance program and enhance their overall business culture.