



INTERNAL OBLIGATIONS

40 DAY CHALLENGE

Day 27 – Level 4



COMPREHENSIVE
COMPLIANCE



OBJECTIVES



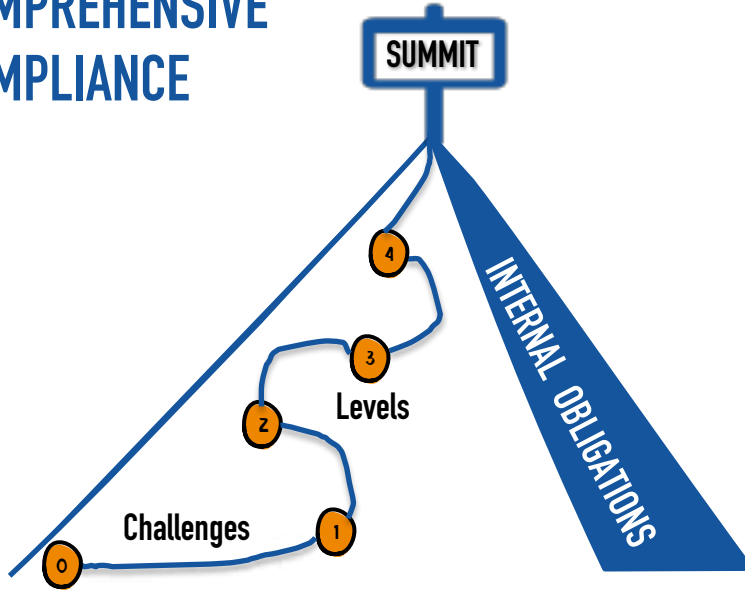
Climber Status



Compliance & Risk Plans



Your Next Challenge



BASECAMP

SCHEDULE



40 DAY INTERNAL OBLIGATIONS CHALLENGE			
DATE	DAY	CHALLENGE	ACTIONS
Wednesday, January 20, 2021	1	Basecamp & Challenge 1	Attend Challenge Stand Up Call
Thursday, January 21, 2021	2		Climb Mountain
Friday, January 22, 2021	3		Complete Challenge Retrospective
Saturday, January 23, 2021	4		Rest
Sunday, January 24, 2021	5		Rest
Monday, January 25, 2021	6	Challenge 2 - Identify Obligations & Metadata	Attend 40 Day Challenge Session # 2
Tuesday, January 26, 2021	7		Climb Mountain
Wednesday, January 27, 2021	8		Climb Mountain
Thursday, January 28, 2021	9		Climb Mountain
Friday, January 29, 2021	10		Complete Challenge Retrospective
Saturday, January 30, 2021	11		Rest
Sunday, January 31, 2021	12		Rest
Monday, February 1, 2021	13	Challenge 3 - Incorporate Obligations	Attend Challenge Stand Up Call
Tuesday, February 2, 2021	14		Climb Mountain
Wednesday, February 3, 2021	15		Climb Mountain
Thursday, February 4, 2021	16		Climb Mountain
Friday, February 5, 2021	17		Complete Challenge Retrospective
Saturday, February 6, 2021	18		Rest
Sunday, February 7, 2021	19		Rest
Monday, February 8, 2021	20	Challenge 4 - Evaluate Compliance Risk	Attend Challenge Stand Up Call
Tuesday, February 9, 2021	21		Climb Mountain
Wednesday, February 10, 2021	22		Climb Mountain
Thursday, February 11, 2021	23		Climb Mountain
Friday, February 12, 2021	24		Complete Challenge Retrospective
Saturday, February 13, 2021	25		Rest
Sunday, February 14, 2021	26		Rest
Monday, February 15, 2021	27	Challenge 5 - Create Compliance & Risk Plan	Attend Challenge Stand Up Call
Tuesday, February 16, 2021	28		Climb Mountain
Wednesday, February 17, 2021	29		Climb Mountain
Thursday, February 18, 2021	30		Climb Mountain
Friday, February 19, 2021	31		Complete Challenge Retrospective
Saturday, February 20, 2021	32		Rest
Sunday, February 21, 2021	33		Rest
Monday, February 22, 2021	34	The Summit - Continuous Improvement	Attend Challenge Stand Up Call
Tuesday, February 23, 2021	35		Climb Mountain
Wednesday, February 24, 2021	36		Climb Mountain
Thursday, February 25, 2021	37		Climb Mountain
Friday, February 26, 2021	38		Complete Challenge Retrospective
Saturday, February 27, 2021	39		Rest
Sunday, February 28, 2021	40		Rest



Weekly Challenges

- #1 Identify Internal Obligations
- #2 Identify Obligations and Metadata
- #3 Incorporate Obligations
- #4 Evaluate Compliance Risk
- #5 Develop Your Compliance Plan
- #6 Sustain Compliance

WEEKLY ACTIVITIES



Monday stand-up call
(GoToMeeting 1-2pm EST)



Create your plan
(challenge worksheet)



Mountain climbing



Friday retrospective
(on-line questionnaire)

CLIMBER STATUS



EVALUTE OBLIGATION RISK

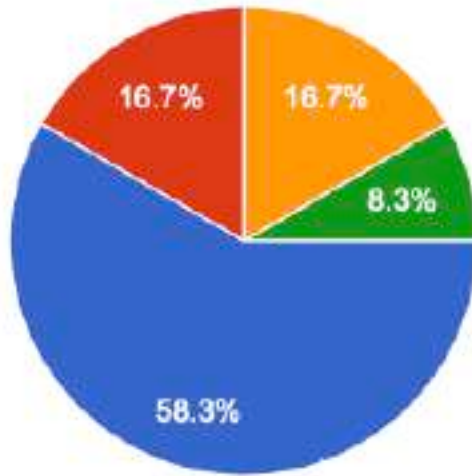
CHALLENGE #4

SKILL	OBJECTIVE
NOVICE	Evaluate obligation risk (qualitative) for all internal obligations
INTERMEDIATE	NOVICE + Identify organizational aspects that are critical to compliance
EXPERT	INTERMEDIATE + Evaluate impact and cost of non-compliance for internal obligations

CLIMBER STATUS



Which CHALLENGE did you work on this week?

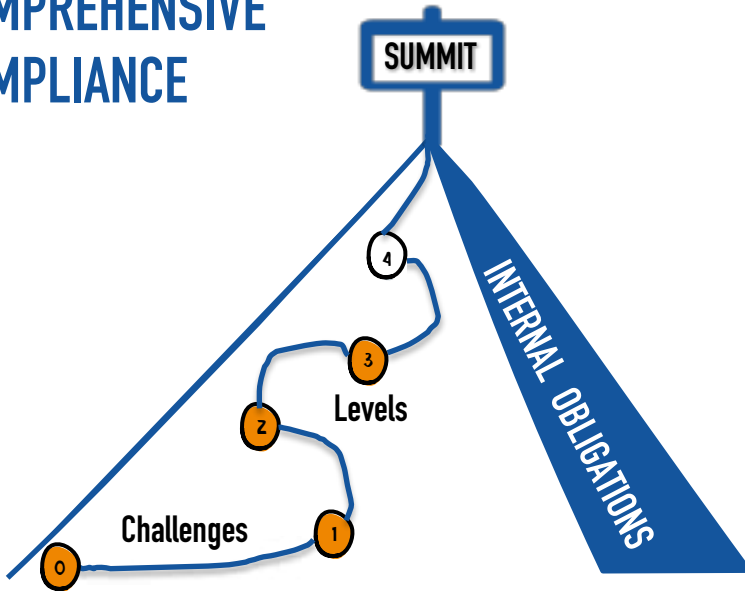


- Challenge 1 - Identify Internal Obligation Sources
- Challenge 2 - Identify Internal Obligations
- Challenge 3 - Incorporate Internal Obligations
- Challenge 4 - Evaluate Obligation Risk
- Challenge 5 - Develop Risk & Compliance Plan
- Challenge 6 - Practice Continuous Im...

CLIMBER STATUS



COMPREHENSIVE
COMPLIANCE



BASECAMP



Update

- How did you do last week?
- What worked or didn't work?
- What lessons did you learn?

COMPLIANCE AND RISK PLAN

COMPLIANCE & RISK PLAN

HIERARCHY OF OBLIGATIONS



ACCEPTING STAKEHOLDER RESPONSIBILITY

ENVIRONMENTAL, SUSTAINABILITY,
GOVERNANCE (ESG)

Stakeholder Expectations

VISION ZERO

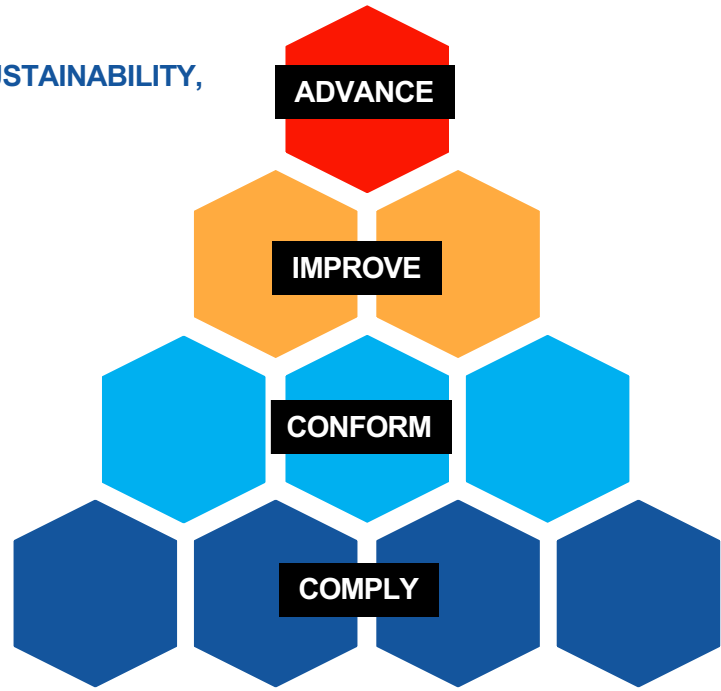
Zero Defects, Zero Violations, Zero
Incidents, Zero Breaches, Zero
Emissions, Etc.

INDUSTRY
STANDARDS

ISO 14000, 19600, 45001, 31000, 9001

REGULATIONS

Legislation, Acts, Licenses, Permits,
Orders



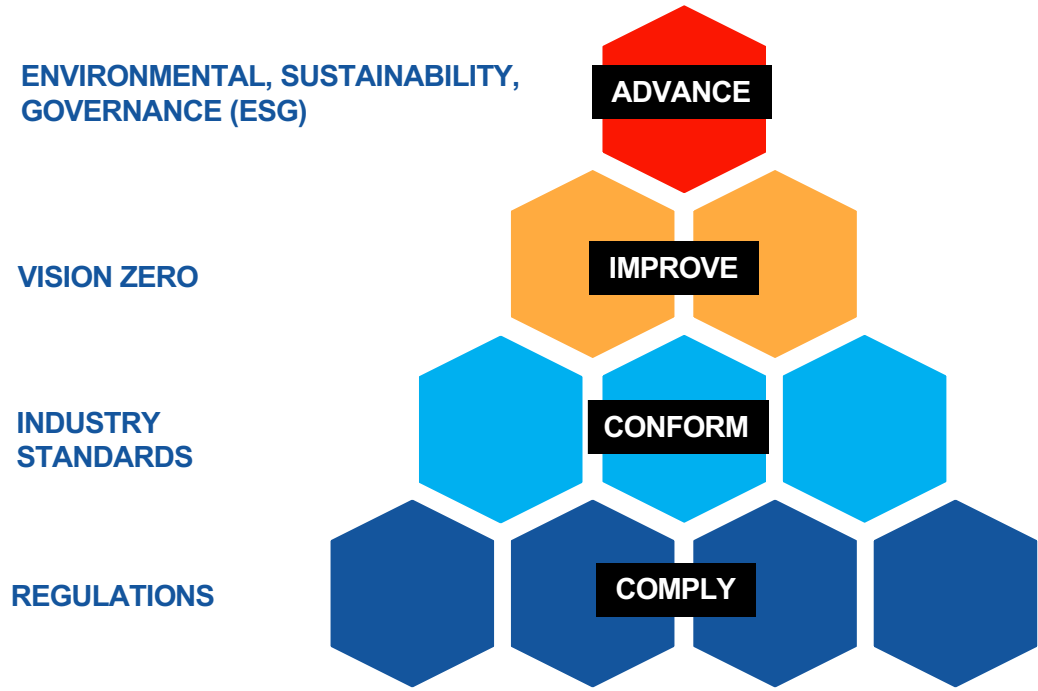
ACCEPTING LEGAL RESPONSIBILITY

COMPLIANCE & RISK PLAN

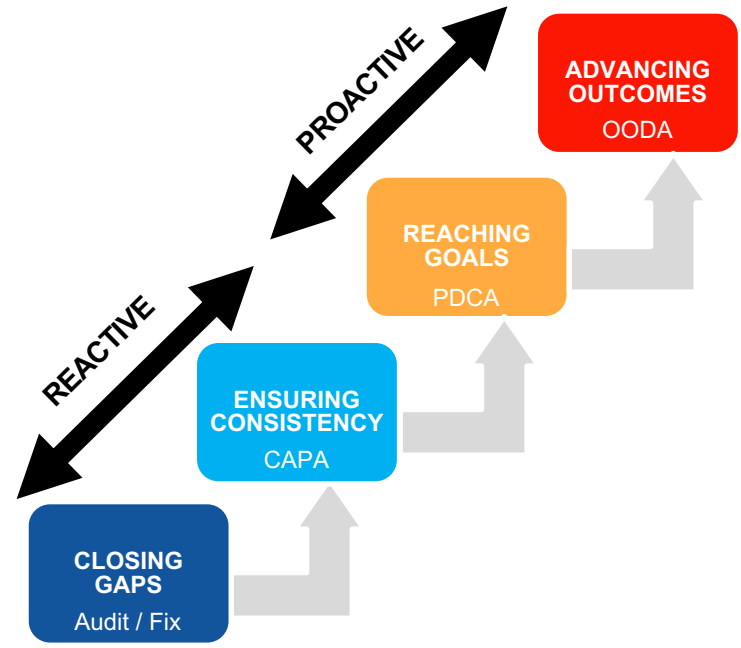
HIERARCHY OF OBLIGATIONS



ACCEPTING STAKEHOLDER RESPONSIBILITY



ACCEPTING LEGAL RESPONSIBILITY



COMPLIANCE & RISK PLAN



**Uncertainty
creates the
opportunity
for risk.**

COMPLIANCE & RISK PLAN

PLANS MAY HAVE DIFFERENT OBJECTIVES



Achieve
measures of
conformance

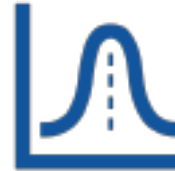
- Close Gaps (CAPA)



Assumes you have the capabilities to achieve the required level of performance but lack consistency.

Achieve
measures of
performance

- Establish Effective Controls



Assumes you have the capabilities but not the consistency or performance to stay between the lines.

Achieve
measures of
effectiveness

- Expand Capabilities



Assumes you do not have the capabilities, performance, or consistency to achieve effective compliance.

COMPLIANCE & RISK PLAN

MEASURES OF COMPLIANCE



Measures of Effectiveness (MoE)
Progress Towards Zero Emissions

Outcome of Compliance



Measures of Performance (MoP)
Ability to Achieve Zero

Technical or Management Capabilities



Measures of Conformance (MoC)
Evidence of Compliance

Obligation Verification

PLANS CONSIST OF OBJECTIVES TO ADVANCE MEASURES OF COMPLIANCE

COMPLIANCE & RISK PLAN

PROJECTS VERSUS CONTINUOUS IMPROVEMENT



Projects

- Delivers new capabilities (technical or management) needed to advance outcomes (i.e. benefits).
- Discrete, has a beginning, means and an end.
- Requires **planning** under uncertainty.

Continuous Improvement

- Delivers improved processes (technical or management) to ensure that the organization stays between the lines.
- Continuous, has a beginning, means but never ends.
- Requires **planning** under uncertainty.

PROJECTS CREATE OPPORTUNITIES FOR COMPLIANCE OUTCOMES

CI INCREASES THE PROBABILITY OF COMPLIANCE OUTCOMES

COMPLIANCE & RISK PLAN

ALL PROJECTS MUST ANSWER THESE QUESTIONS



1. What does DONE look like?

Often in terms of capabilities not just evidence of compliance in units of measure meaningful to stakeholders.

2. How do we get there?

This is our PLAN (i.e. strategy) to get to DONE

3. Do we have enough time, resources and money to get there?

This is our BUDGET to get to DONE.

4. What impediments will we encounter along the way?

This is our RISK PLAN to ensure we get to DONE.

5. How do we know we are making progress?

Measure of our progress to DONE in units meaningful to stakeholders.

**YOUR PLAN
TO CLOSE
CHALLENGE GAPS**



40 DAY INTERNAL OBLIGATIONS CHALLENGE SCORECARD

PARTICIPANT	
Name	Raimund Laqua
Date	Today
Accepted Challenge	Absolutely

INTERNAL OBLIGATIONS ASPECT	CHALLENGE	BEFORE ASCENT (0-5)	AFTER ASCENT (0-5)	IMPROVEMENT (0-5)	COMMENTS
Obligation Sources	1	0	2	2	Identify Gaps
Obligations & Metadata	2	0	1	1	Identify Gaps
Obligations Register	3	0	3	3	Identify Gaps
Obligation Risk	4	0	1	1	Identify Gaps
Compliance Plan	5	0	5	5	Consolidate Gaps
Continuous Improvement	6	0			

STAYING ON TOP OF ALL YOUR INTERNAL OBLIGATIONS

TOTALS		0	7	12	Comprehensive coverage of all internal obligations
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COMPLIANCE & RISK PLAN

YOUR PLAN TO CLOSE THE GAPS



1. What does DONE look like?

2. How do we get there?

3. Do we have enough time, resources and money to get there?

4. What impediments will we encounter along the way?

5. How do we know we are making progress?

COMPLIANCE & RISK PLAN

YOUR PLAN TO CLOSE THE GAPS



OK

1. What does DONE look like?

Measures of compliance identified with defined audit protocols for all high-risk internal obligations.

2. How do we get there?

Plan to get there....

3. Do we have enough time, resources and money to get there?

Budget to get there ...

4. What impediments will we encounter along the way?

Plan to ensure that we get there ...

5. How do we know we are making progress?

Number of high-risk obligations identified in obligations register.

COMPLIANCE & RISK PLAN

YOUR PLAN TO CLOSE THE GAPS



BETTER

1. What does DONE look like?

20% reduction in CO2 emissions associated with operations at the Montreal facility by 2025.

2. How do we get there?

Plan to get there....

3. Do we have enough time, resources and money to get there?

Budget to get there ...

4. What impediments will we encounter along the way?

Plan to ensure that we get there ...

5. How do we know we are making progress?

Measure of actual and planned CO2 emissions over time.

YOUR NEXT CHALLENGE



CREATE COMPLIANCE PLAN

CHALLENGE #5

OBJECTIVE	SKILL	DESCRIPTION
1	NOVICE	Create plan to close the gaps identified during the challenge
2	INTERMEDIATE	NOVICE + Create plan to achieve compliance for all internal obligations.
3	EXPERT	INTERMEDIATE + Develop risk plan to increase the probability that all your obligations will be met.



40 DAY INTERNAL OBLIGATIONS CHALLENGE SCORECARD

INTERNAL OBLIGATIONS ASPECT	CHALLENGE	BEFORE ASCENT (0-5)	AFTER ASCENT (0-5)	IMPROVEMENT (0-5)	COMMENTS
Obligation Sources	1				
Obligations & Metadata	2				
Obligations Register	3				
Obligation Risk	4				
Compliance Plan	5				
Continuous Improvement	6				
SUMMIT					
TOTALS					

PARTICIPANT	
Name	
Date	
Accepted Challenge	

40 DAY INTERNAL OBLIGATIONS CHALLENGE WORKSHEET

ASCENT	
Participant:	
Challenge	
Date:	
Outcome	

CURRENT CONDITION	PLAN	ACTIVITY / PROGRESS	DO
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Assessment (0-5):

NEXT TARGET CONDITION / OBJECTIVE	PLAN
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TROUBLESHOOTING	GAP FROM STANDARD	RAISE STANDARD	INNOVATE
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IMPLEMENTATION PLAN	PLAN
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THREATS / COUNTERMEASURES	PLAN
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ACTIVITY / PROGRESS	DO
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VERIFICATION / VALIDATION	CHECK
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Assessment (0-5):

LESSONS LEARNED / FOLLOW UP (ACTIONS)	ACT
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Q&A

REMAINING CHALLENGES

YOU REACHED THE SUMMIT



COMPREHENSIVE
COMPLIANCE



BASECAMP



OBJECTIVES



Climber Status



Continuous Improvement



Your Continuous Challenge



CONTINUOUS CHALLENGE

SKILL	OBJECTIVE
NOVICE	Develop continuous improvement process for internal obligations.
INTERMEDIATE	NOVICE + Establish process to manage change to obligation sources, obligations, or mission objectives.
EXPERT	INTERMEDIATE + Identify the capabilities needed to always stay in compliance..



40 DAY INTERNAL OBLIGATIONS CHALLENGE SCORECARD

INTERNAL OBLIGATIONS ASPECT	CHALLENGE	BEFORE ASCENT (0-5)	AFTER ASCENT (0-5)	IMPROVEMENT (0-5)	COMMENTS
Obligation Sources	1				
Obligations & Metadata	2				
Obligations Register	3				
Obligation Risk	4				
Compliance Plan	5				
Continuous Improvement	6				
SUMMIT					
TOTALS					

PARTICIPANT	
Name	
Date	
Accepted Challenge	

40 DAY INTERNAL OBLIGATIONS CHALLENGE WORKSHEET

ASCENT	
Participant:	
Challenge	
Date:	
Outcome	

CURRENT CONDITION	PLAN	ACTIVITY / PROGRESS	DO
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Assessment (0-5):

NEXT TARGET CONDITION / OBJECTIVE	PLAN
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TROUBLESHOOTING	GAP FROM STANDARD	RAISE STANDARD	INNOVATE
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IMPLEMENTATION PLAN	PLAN
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THREATS / COUNTERMEASURES	PLAN
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VERIFICATION / VALIDATION	CHECK
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Assessment (0-5):

LESSONS LEARNED / FOLLOW UP (ACTIONS)	ACT
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**CONGRATULATIONS ON COMPLETING
THE 40 DAY CHALLENGE**