



Glencore's bespoke ethics and compliance training boosts employee engagement globally

An LMS platform powered by tailored content drives efficiency and quality in trainings

Background

Glencore is one of the world's largest global diversified natural resource companies and a major producer and marketer of more than 60 responsibly sourced commodities that advance everyday life. Through a network of assets, customers and suppliers that spans the globe, it produces, processes, recycles, sources, markets and distributes the commodities that enable decarbonization while meeting the energy needs of today.

Glencore companies employ around 135,000 people, including contractors. With a strong footprint in over 35 countries in both established and emerging regions for natural resources, our marketing and industrial activities are supported by a global network of more than 40 offices.

Glencore's customers are industrial consumers, such as those in the automotive, steel, power generation, battery manufacturing and oil sectors. They also provide financing, logistics and other services to producers and consumers of commodities.



Glencore's Training Challenges

Glencore has invested significant resources over the last number of years to build and implement a best-in-class ethics and compliance program and has made significant investments in systems.

Glencore recognized that to effectively embed ethical behaviors as a strategic corporate and cultural objective, it would need to adopt a refreshed approach, one which worked globally and communicated the company's values and expectations to everyone in a simple and effective way. One of the solutions to tackle this challenge was to work strategically with two key partners, Cornerstone and SAI360, to identify the training needs, design appropriate and engaging learning content, and deliver it to the target audiences in an impactful manner.

Glencore reviewed several off-the-shelf content offerings but quickly discovered that they didn't meet the needs identified. In addition, most of the content seemed to only focus on specific industries such as financial services and pharmaceuticals, which did not reflect Glencore's core business. Furthermore, there was not enough focus in these off-the-shelf trainings on how employees can turn to the company's values for guidance in decision making.

Turning to Cornerstone and SAI360

To address its training challenges, Glencore turned to Cornerstone and its expansive content partner network. Through this first move, Glencore implemented Cornerstone's widely used Learning Management System (LMS) to digitally transform training across its workforce. The LMS offered Glencore the ability to group its employees in different categories thereby allowing for targeted training assignments.

Cornerstone also offers an app that would enable some of Glencore's frontline and more remote workers to access training courses on their mobile devices. The LMS functions as a one-stop shop for employees and, because of this ease of use, was a clear choice for Glencore.

Other benefits Glencore saw in Cornerstone included:

- A large and experienced support team with key project management skills.
- The ability to host large quantities of content on servers globally, making it more accessible.
- Varying administrative rights at the corporate, regional, and local levels to ensure a smooth global rollout of annual compliance training completions.
- Email notifications and automated reminders, escalations, and managerial oversight to review, assign and track training.
- Robust reporting within the LMS that allows Glencore to track in-depth information about employee progress and knowledge retention.
- The ability to access the effectiveness of its training through deployment of feedback surveys.

Glencore realized that the success or failure would be determined by its approach to a number of specific logistical challenges, including:

- **Geographically remote locations** with low bandwidth that could not handle video-and image-heavy content due to internet connectivity.
- **Diverse sets of employees** requiring training to be translated into 11 languages.
- **A large variety of employee roles** that necessitated Glencore's training be tailored and relevant for individual groups.
- **A large global presence that made tracking and reporting training progress essential and required streamlined delivery.**
- **A large population of frontline workers, most of whom don't have access to online training.**

Cornerstone and SAI360 have collaborated through a strategic partnership for several years, leveraging each other's expertise as needed. As a leader in the compliance industry and a trusted partner, the volume and variety of courses and topics in SAI360's library of content is unmatched. SAI360 also has the in-house expertise and capability to transform and manage a training program of Glencore's size and scope.

As a global compliance specialist, SAI360 is able to offer:

- A comprehensive compliance content library.
- Bespoke and configurable content to match Glencore's unique needs.
- Top-tier translation services supporting 60+ languages.
- An Instructional Design team to craft an engaging learning experience supported by a robust network of legal SMEs.
- Dedicated Customer Success Manager for training initiatives.
- An internal Project Management team committed to managing the full life-cycle of the project.
- Solutions for co-branded content.
- Continuous library updates with the latest regulatory changes and new, relevant scenarios.

Glencore now had two companies working in tandem to improve its employee compliance training experience. Cornerstone provided the system that allowed for better training management as well as program access for geographically distributed employees, while SAI360 worked with Glencore to tailor trainings to specific roles and their risk exposure.

Combining Cornerstone and SAI360

This expert partnership has been pivotal to helping Glencore achieve its compliance training aspirations. Training content quality has risen to the standards the company was aiming for with more focus and relevance for its employees. Through SAI360, Glencore now offers its employees four core courses: Code of Conduct, Anti-Corruption and Bribery, Conflicts of Interest, and GDPR/Data Protection and Privacy. These have each been customized to fit the unique needs of Glencore and are better targeted towards the employees who present the highest risk for each of these subjects. An added feature is the ability to track employee confidence in the behavioral decisions they make during the scenario-based learning.

This has been a journey for all involved. SAI360 and Glencore first focused on streamlining the comprehensive 45-minute learning sessions which proved too time-intensive and detailed for employees. The companies then worked together to design an experience that focused on behaviors more than theory, focusing on real-life situations that employees might encounter at work. By cutting out the excess information that didn't help their employees do their jobs, most trainings were reduced to 15-minute sessions.

Glencore had also emphasized to SAI360 and Cornerstone the need for an effective training assignment and tracking system, to further improve employee satisfaction as well as ensure that each course was tailored to the right audience. This was a key requirement for Glencore. Subsequently, 50,000 employees and contractors were classified in the LMS by function and/or roles, based on the company's compliance risk rating.

Cornerstone and SAI360 partnered to enhance Glencore's compliance training program by delivering creative solutions, clear communications and measurable goals.

HOW CORNERSTONE AND SAI360 DELIVERED

The optimization of content with bespoke branding and improved data collection met the expectations set out by Glencore. Together, SAI360 and Cornerstone designed and implemented a customized system for Glencore featuring:

- **Transparency through Reporting** – It is now possible to track employees who may not have company email addresses, and link users from various HR systems. Data tracking and reporting are now much more sophisticated than before.
- **Improved Assigning** – The system now has the option to assign trainings to various groups within Glencore. This has helped accommodate the company's employee risk classification system and deliver trainings to the right people.
- **Translations** – The system supports 11 translations for Glencore's diverse teams.
- **Compliance Assistance** – SAI360 ensured that Glencore would continue to have a dedicated compliance contact for project management of training initiatives.
- **Engaging Content** – Content is now available in an engaging format that is user-friendly and easy to understand.
- **An Updated Library** – A significant amount of custom content had to be created for Glencore's program, leveraging the continual updates to SAI360's library that focus on recent regulatory changes and pertinent scenarios. In addition, Glencore developed its own training in-house, targeted at high-risk employees.
- **Improved Analytical Capabilities** – The content created for Glencore was designed for maximum data output. Through the LMS and SAI360's content, Glencore is able to view and report on the number of attempts on any interactive activities and measure how much information employees have retained.

Our unified approach to risk sets us apart

Today's complex risk landscape demands more. SAI360 leads the way with an integrated GRC platform and Learning solution that spans the entire risk and compliance spectrum.

Risk Management Solutions

- Risk & Compliance Management Solutions
- Enterprise & Operational Risk Management
- Regulatory Compliance
- Policy Management
- Third-Party / Vendor Risk Management
- Internal Controls
- Internal Audit
- Incident Management
- Conflicts of Interest (COI)
- Gifts and Hospitality
- IT & Cybersecurity
- Business Continuity Management

Ethics & Compliance Learning Solutions

- Anti-Bribery & Anti-Corruption
- Competition & Anti-Trust
- Conflicts of Interest
- Data Protection & Privacy
- Exports, Imports & Trade Compliance
- Harassment & Discrimination