When a team of auditors assesses a company’s compliance program, it’s natural to ask the question, “How do they know what they’re talking about?” There’s a high degree of trust, because of their professionalism and your faith in the firm. But still, many may wonder.

At Ernst & Young (EY) in Brazil, the firm found a way both to build the expertise of its team and instill client trust: It has begun a program of sending its auditors to the SCCE Basic Compliance and Ethics Academy, which is conducted in Sao Paulo each year. It’s also having teammates earn their Certified Compliance & Ethic
Leading the charge is Fernando M. Caleiro Palma, Executive Director in the Compliance practice at EY. Fernando was a graduate of the SCCE 2011 Sao Paulo Academy. At that time, he was a part of the compliance team for Archer Daniels Midland. Back then the opportunities to train compliance officers were few and far between, and in many ways, they still are. “Nowadays our Brazilian community is still struggling to find robust and reliable compliance educational opportunities. Imagine four years ago,” said Palma. The SCCE Academy was and is a game changer. “With an experienced team and a great amount of professionalism, SCCE inaugurated in Brazil the first and complete opportunity for professionals to dive in and through all elements of a robust compliance program.”

Palma also made the effort at the time he attended the Academy to take the CCEP® exam (there was no CCEP-I® exam then) and passed it. He found it had “an important and positive impact” on his work.

For Palma, sending members of his team to the Academies was literally a “professional dream come true” with benefits for both EY and its clients. “This is a clear communication that in order to help our clients to achieve the right results in the right way, and also to help them build (or strengthen) their compliance programs, we will swim upstream and offer a talented group of compliance practitioners certified in the most well-recognized compliance and ethics certification in the world.

“It shows our capacity, knowledge, and EY’s commitment to doing its part in building a better working world.”

**Legislation**

The EY initiative comes at a time of intense focus on compliance in Brazil. A new anti-corruption law, known as the Brazilian Clean Companies Act (the Act), has passed. The Brazilian government itself even sent three members of the Office of Controller General to the 2014 SCCE Sao Paulo Academy.

The Act is already having an impact, Palma reports. “Companies operating in Brazil already have started to see compliance as a competitive advantage, becoming more strategic and necessary, not only to mitigate financial and reputational risk, but also to ensure that the right results will be achieved the right way.”

Other recently passed pieces of legislation are also having an impact on compliance programs in Brazil. Palma explains that the country has passed new legislation covering conflicts of interests of government officials, anti-money laundering, and a new law relating to the access to data.

Outside of the legislative sphere, according to Palma, “Brazil continues to attract significant foreign investment, especially with respect to multinational companies.” A robust compliance program is increasingly an expectation of these firms.

At the same time, though, the business environment can be challenging in Brazil,
which itself is a driver of compliance programs. Palma explains that, “It remains a highly regulated and bureaucratic environment in which conducting business requires varied and frequent contact with government officials on all levels.” In addition, because of the size of Brazil, there are significant regional differences, which pose their own challenges.

**A wide range of compliance matters were discussed, as is the case for all SCCE Academies.**

A wide range of compliance matters were discussed, as is the case for all SCCE Academies. As a result, the EY participants reported that there were a wide range of new ideas to both help them develop personally and to help them better serve their clients.

For Elton Brogliatto, one key piece of learning that was driven home was “the importance of non-retaliation policy and its dissemination through top and middle management to guarantee the effectiveness of the hotline.”

Tiago Gaspar left with a better sense of how to structure the compliance cycle and the interaction of Compliance with other departments.

A deeper appreciation of “how to structure policies, procedures, a code of conduct, and the role of the CCO and the Compliance area” was gained by Renata Franco Salgado Leite.

Marcelo Merzari left with a deeper understanding of the importance of the board’s buy in.

But no matter what the individual pieces of data that resonated move, the attendance of the EY attendees reflected much more than Fernando Palma’s professional dream come true. It reflected an increased focus on compliance in Brazil, not just by companies, but by those who serve them as well.

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