



Retail Ethics and Compliance Survey 2018

Ethics and compliance may promote stability
and differentiation in a time of change

September 2018

Dear Compliance, Legal, and Risk Leaders,

The Retail Industry Leaders Association (RILA) and Deloitte¹ are pleased to share with you the results of our **Retail Ethics and Compliance Survey 2018**. In this first-of-its-kind survey for the retail industry, our goal was to understand how retailers are managing uncertainty and risk through their corporate ethics and compliance programs.

Compliance and legal executives from across RILA's membership answered almost 50 questions about their ethics and compliance program structure, governance, and maturity as well as about the role and scope of responsibilities of the chief ethics and compliance officer within their organization. Their responses shed light on companies' investment in ethics and compliance, sources of leverage, notable challenges, and the perceived effectiveness of their ethics and compliance programs.

As you'll see in the executive summary, and the appendix containing detailed survey findings, the results provide a candid look at the current state of ethics and compliance programs within the retail industry. The findings not only provide insights into how retail organizations are managing compliance risk, they also hint at how compliance might promote stability and competitive differentiation in times of change. For additional insights, we interviewed several chief ethics and compliance officers and have provided a few of their observations throughout the executive summary.

We hope the collected insights will give you a sense of how your company's ethics and compliance program compares to your peers and spark fresh ideas for taking your program to the next level.

Regards,

Kathleen McGuigan
Senior Vice President &
Deputy General Counsel
Retail Industry Leaders Association

Kevin Lane
Principal
Deloitte Risk and Financial Advisory
Deloitte & Touche LLP

¹ As used in this document, "Deloitte" means Deloitte & Touche LLP, a subsidiary of Deloitte LLP. Please see www.deloitte.com/us/about for a detailed description of the legal structure of Deloitte LLP and its subsidiaries. Certain services may not be available to attest clients under the rules and regulations of public accounting.

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Executive summary

About the survey

In early 2018, the Retail Industry Leaders Association (RILA) and Deloitte surveyed RILA members about their companies' ethics and compliance programs (compliance programs). Our survey explored the different ways in which retailers' compliance programs have developed and matured in recent years as they confront forces that are reshaping the retail industry and address increasingly varied risks.

We asked retailers about how their compliance programs are designed, implemented, managed, and governed. We were especially interested to learn where they have leveraged people, process, technology, and analytics to modernize their approach to addressing compliance challenges. We also asked them about performance measures, tools, technologies, and other potential productivity levers that can help enable retailers to manage known and emerging risks in a rapidly evolving landscape.

This executive summary touches on the top-line results of the survey and offers insights on potential implications. The detailed results of the survey can be found within the appendix.

Effective compliance programs take an integrated approach to a company's ethics, values, and culture in the context of complying with legal and regulatory requirements.

Compliance maturity: A journey with many starting points

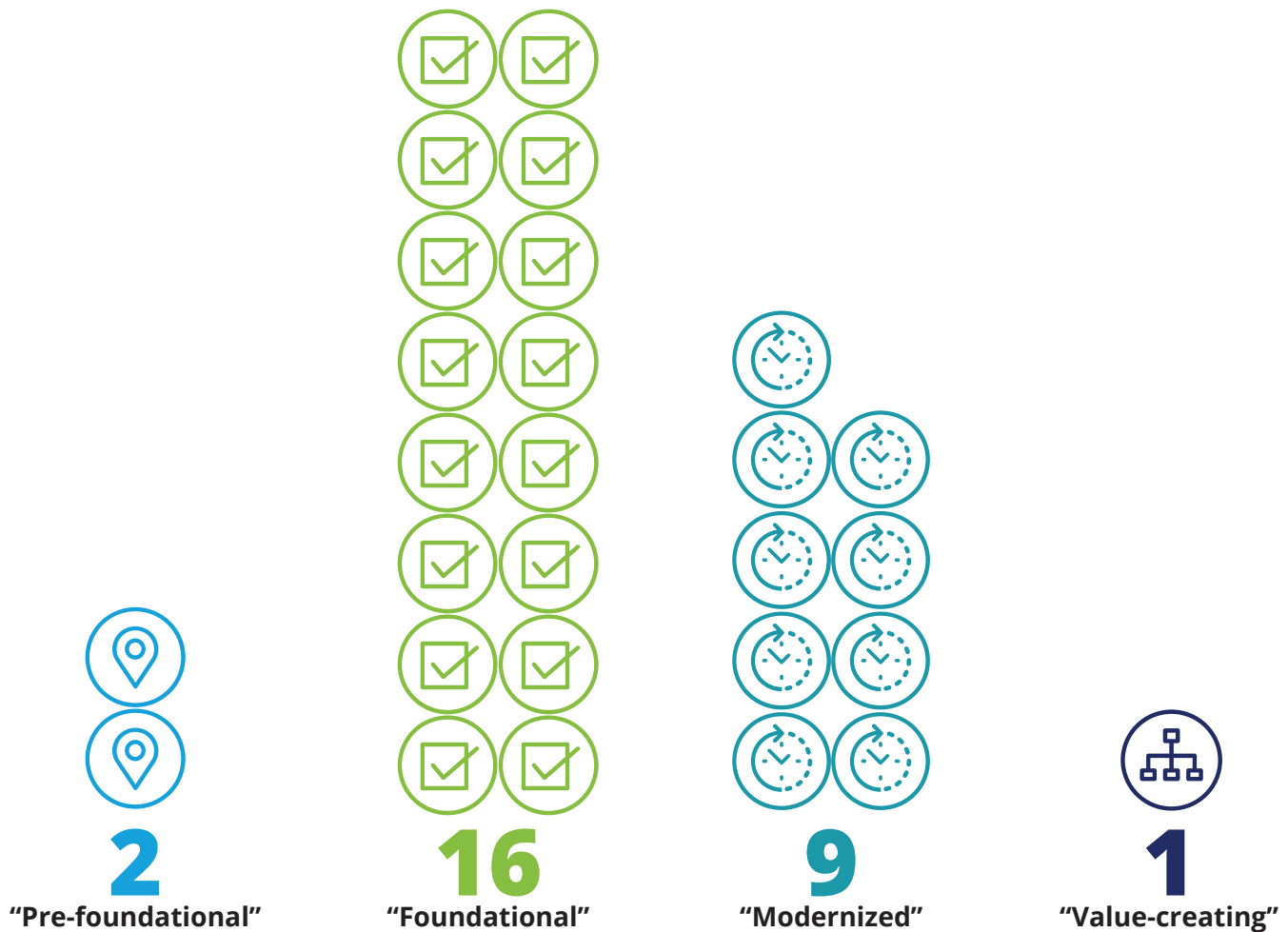
All survey respondents indicate that their companies have risk and compliance programs (question 27).² This makes sense given the wide variety of statutory and regulatory requirements that apply to the retail industry, including those that are broadly applicable. These include employment, environmental health and safety, and product and food safety, and others that apply to more specialized retail operations, such as consumer finance and retail health and wellness/pharmacy.

Historically, retail has not been viewed as a *heavily* regulated industry. However, the industry is a *multi-regulated* one, with regulations touching nearly all areas of operation from pharmacy to distribution centers to products and the workforce. Retail is now subject to a patchwork of applicable laws and regulations developed by international, federal, state, and local authorities. These factors combine to make an organized response to ethics and compliance risks imperative.

Even so, retail compliance programs are at varying states of maturity (question 27). A majority of respondents identify their program as being "*foundational*"—that is, program meets core requirements and expectations; basic operating model identifies roles and responsibilities and includes methodologies to assess, prioritize, and mitigate compliance risks. Just shy of one-third have a program that is "*modernized*," or mature enough to operate in synergy with business units, make use of advanced analytics, and articulate its value through a measurable return on investment (see figure 1). In short, retail compliance programs have considerable room to grow.

² All findings described in this paper are noted parenthetically as here, and the corresponding question can be found in the appendix starting on page 14.

Figure 1. Current state of compliance program maturity [Question 27, N=28]



"Pre-foundational" – Program is in early stages of development and still establishing core elements prescribed in official guidance

"Foundational" – Program meets core requirements and expectations; basic operating model identifies roles and responsibilities and includes methodologies to assess, prioritize, and mitigate compliance risks

"Modernized" – Program reflects elevated, strategic view of compliance; demonstrates enhanced synergies with business units, which promote efficiencies, and rationalized oversight and execution processes; use of advanced analytics

"Value-creating" – Program has achieved advanced level of sophistication with optimized oversight and execution processes; close alignment with overall business strategy with program value articulated through measurable return on investment (ROI)

And grow they must, if they are to cope with a fragmented legal and regulatory environment and the associated regulatory risks, especially in light of several recent high-profile corporate compliance failures across business sectors and the resulting regulations and enforcement scrutiny. Those incidents include data security breaches, sexual harassment, bribery and corruption, food safety violations, and frauds perpetrated on customers.

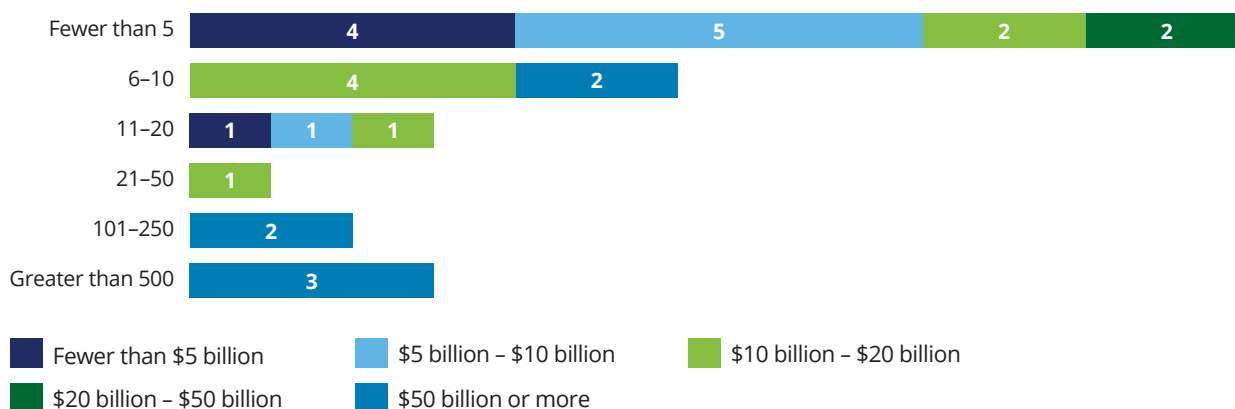
“Recognizing compliance and giving compliance a seat at the table in the organization and in decision-making processes is becoming increasingly important. Having compliance involved up front can help to save time and money later—helping to demonstrate tangible value to the organization.”

Martha Sarra
Vice President and Chief Ethics
and Compliance Officer
The Kroger Co.

Retailers also face challenges because they tend to have multiple operating locations, high employee turnover, and a significant online presence. Perhaps recognizing these factors, nearly four out of ten respondents expect to increase their compliance program budgets in 2018 and beyond (question 25). However, when asked about 2017 total budget for enterprise-wide compliance functions, about a quarter of respondents either did not know what was budgeted for compliance or indicated that there was “no assigned budget” for compliance (question 21). While these retailers may include funding for compliance program-related activities within respective business units’ general operating budgets, a leading practice is transparency in budgeting to determine whether a compliance program is adequately resourced and clearly demonstrates management’s commitment to the compliance program.

On a related point, program staffing is widely distributed (question 13). Two-thirds of respondents indicated that their companies have fewer than 10 people dedicated to the corporate compliance program. When looked at by company size (as defined by annual revenue), at one end of the spectrum a handful of respondents in companies with more than \$50 billion in annual revenue indicate their company has more than 100 people working full-time on the design, implementation, and/or maintenance of their compliance program. Several of those respondents indicate their company has 500 or more. At the other end, a dozen companies across all company sizes (except for \$50 billion or more) have fewer than 5 people doing similar work (see figure 2).

Figure 2. What is the total number of full-time people within your company focused specifically on designing, implementing, and/or maintaining the company’s ethics and compliance program? [Question 13 (sorted by company annual revenue for the most recent fiscal year), N=28]



“Retailers are slowly recognizing the need to have CCOs operate at a high level and independently. But I think the way it shows up in a structure or a model will be different for every retailer.”

Todd Hartman
Chief Risk & Compliance Officer
Best Buy Co., Inc.

Program leadership and structure—different needs, many approaches

Less than a quarter of respondents say their company has a stand-alone chief compliance officer (CCO), responsible only for ethics and compliance (question 8). In most respondents' companies, the job of compliance is added to the existing responsibilities of another company senior executive. Several respondents say the compliance role reports to the company's legal department or general counsel's office (question 9).

It is important to note that this type of organizational structure increasingly is being scrutinized in more heavily regulated industries given that it can generate some tension, since an ethics and compliance team must surface risks while the legal team is duty-bound to minimize them. A dedicated CCO might better reinforce the messaging of compliance being a separate and independent function from other areas of the enterprise—an important factor in

program effectiveness and elevating the stature of the compliance program. If a CCO reports up through a senior company executive, it is critical that there be clear lines of reporting to company senior executives and the board to ensure the independence of the compliance program.

“I am very happy that we have compliance within legal. Our key objective is to be partners with the business and bring value to them. We do not throw our weight around in the legal department, but it helps to be able to use our weight for the business when it helps them. It could make sense for compliance to sit elsewhere for other organizations. But when you have the variety of issues we've scoped in for compliance, legal is the correct fit at our organization.”

Director of Compliance
Fortune 500 Retailer

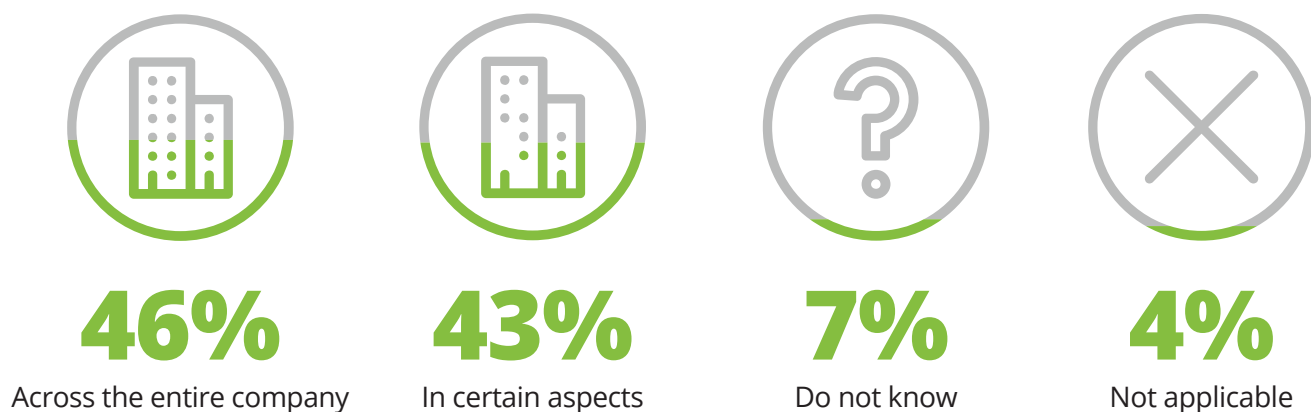
Nearly half of the respondents say that their company's compliance program is viewed as a partner to business units company-wide (see figure 3). The majority of respondents with this view are in larger companies, but a few smaller companies are in the mix as well. It is possible that these companies may simply have figured out a way to execute compliance activities as "built-in" practices without overly burdening the business functions, rather than being viewed as a "bolt-on" program.

All but a few respondents say their company uses web-based training for ethics and compliance (question 41). That training is heavily focused on cybersecurity, privacy, labor, employment, and an overall culture of integrity (question 40). However, more than a third of respondents indicate that training is assigned to all employees without specific connection to results of a risk assessment (question 39) instead of training being targeted to specific employee segments based on identified risk areas, which is considered a leading practice in compliance.

"The dilemma with retail is always the turnover at the store level. How do you train associates in a way that things stick when they are resource- and time-crunched? You're balancing that against the expectations of regulators. We work hard to make training meaningful so that people learn and it sticks. Thinking creatively and helping the business think creatively about delivering their message is far more effective than just training everyone for 25 minutes so we can check the box."

Director of Compliance
Fortune 500 Retailer

Figure 3. Extent that the compliance function is viewed as a partner to the business units [Question 14, N=28]



Program measurement and accountability—room for growth

Almost 60 percent of respondents indicate that their organization makes some attempt to measure compliance program effectiveness (question 42). Nearly 40 percent of respondents are either confident or extremely confident that the metrics provide a true sense of their company's compliance program effectiveness (question 44). They tend to use more traditional effectiveness metrics—analysis of internal audit findings, analysis of self-assessment results, required compliance training completion rates, and so forth—rather than what may be considered as more advanced metrics, such as results of compliance risk assessments (risk rating and control effectiveness), testing and monitoring activities (by the compliance program rather than internal audit), or consideration of the degree to which compliance activities are integrated into business workflows (question 43).

The effectiveness of a compliance program can only be measured when the underlying compliance risk profile is considered and understood. Nearly two-thirds of respondents say their company performs an enterprise-wide compliance risk assessment (question 31). Three-quarters of those whose company performs such risk assessments indicate that they are done at least once a year (question 32), with widespread participation among stakeholders (question 34). In most cases, this is done in conjunction with another assessment process, such as an internal audit risk assessment or a broader enterprise risk assessment (question 33).

“Compliance teams have not always been seen as friendly and approachable. If you can get out of that model and be seen as a business partner who understands the business, really great things can happen. It can facilitate a whole level of interaction and insight that helps you do your job as a compliance officer and helps the company. Also, each year, I try to show my ROI. Because we did X, there was Y benefit to the company. All of that adds up.”

Director of Compliance
Fortune 500 Retailer

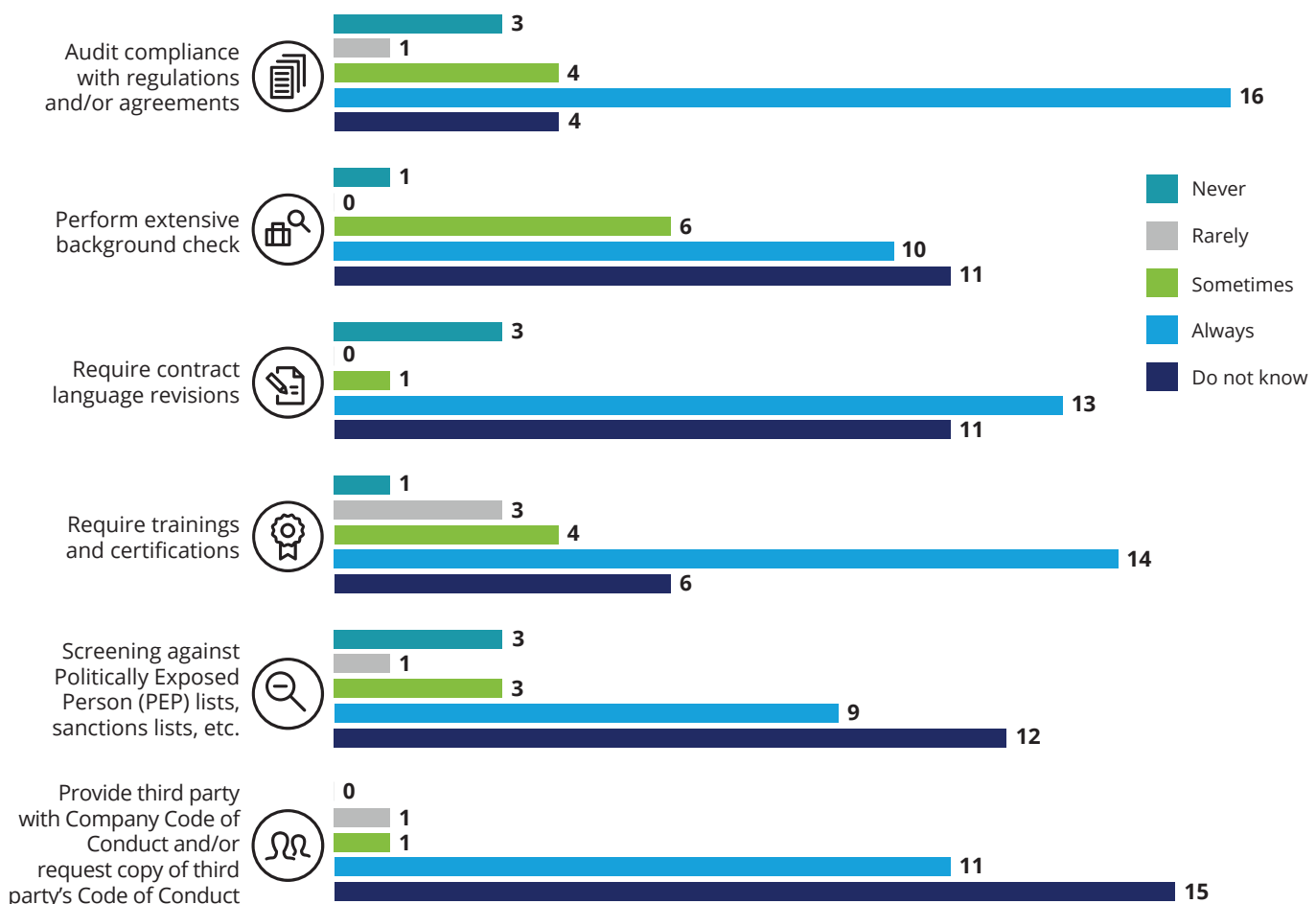
Most respondents say their company's board consistently holds senior leadership accountable for tone at the top (question 19). Yet, when asked whether compliance-related metrics are included in senior management's performance evaluation, 82 percent said no (question 16).

These two findings raise a question about how companies can be holding their senior executives accountable without compliance-related metrics in their performance evaluations—an interesting dynamic that could be explored further in future surveys. It is an important point, because accountability is a critical factor in avoiding complacency and demonstrating the ongoing improvement of a company's compliance program. Increasingly, government regulators, investors, customers, and other stakeholders are pushing companies to regularly assess the effectiveness of corporate compliance programs and

hold executives specifically accountable for ethical and compliant behavior.

Every company in the survey sets the bar for ethics and compliance with a code of conduct (question 18). With regard to third-party risk management, a significant number of respondents indicate that their company always or sometimes either provides third parties with the company's code of conduct or requests a copy of the third party's own code of conduct. This is a cornerstone of managing third-party relationships (see figure 4). But is it enough?

Figure 4. Methods used to identify and manage compliance risks related to third-party relationships [Question 37, N=28]



Many respondents are reassessing their company's joint ventures, suppliers, distributors, and agents based on the applicable underlying risk and degree of oversight needed (question 36). Most companies are also using some kind of technology or automated tool to manage third-party compliance risk (question 47). This is consistent with the roughly 50 percent of respondents who indicate that their company's third-party relationships are a significant compliance concern (question 29).

"The biggest challenge in retail is it's a tough business and it's a thin-margin business. We don't have the luxury of gold-plating programs the way other industries do... If you understand your company's culture and you integrate the values that you know will guide the right ethical behavior into that culture, then you can make a huge impact."

Todd Hartman
Chief Risk & Compliance Officer
Best Buy Co., Inc.

Program improvement—technology and outsourcing play important roles

Technology has become increasingly instrumental in the effectiveness of compliance programs. Here, as in other areas of the survey, findings related to the incorporation of technology into compliance programs varied widely depending on the specific issue area and maturity of a company's compliance program.

For example, nearly all respondents indicate that their company monitors for regulatory changes via a manual process that relies on a balance of information from internal and external sources (question 47). Various technology solutions exist, including regular data feeds, which can increasingly help retailers to stay abreast of the laws and regulations that apply to them, particularly given the myriad of international, federal, state, and local laws and regulations that apply to many companies within the retail industry.

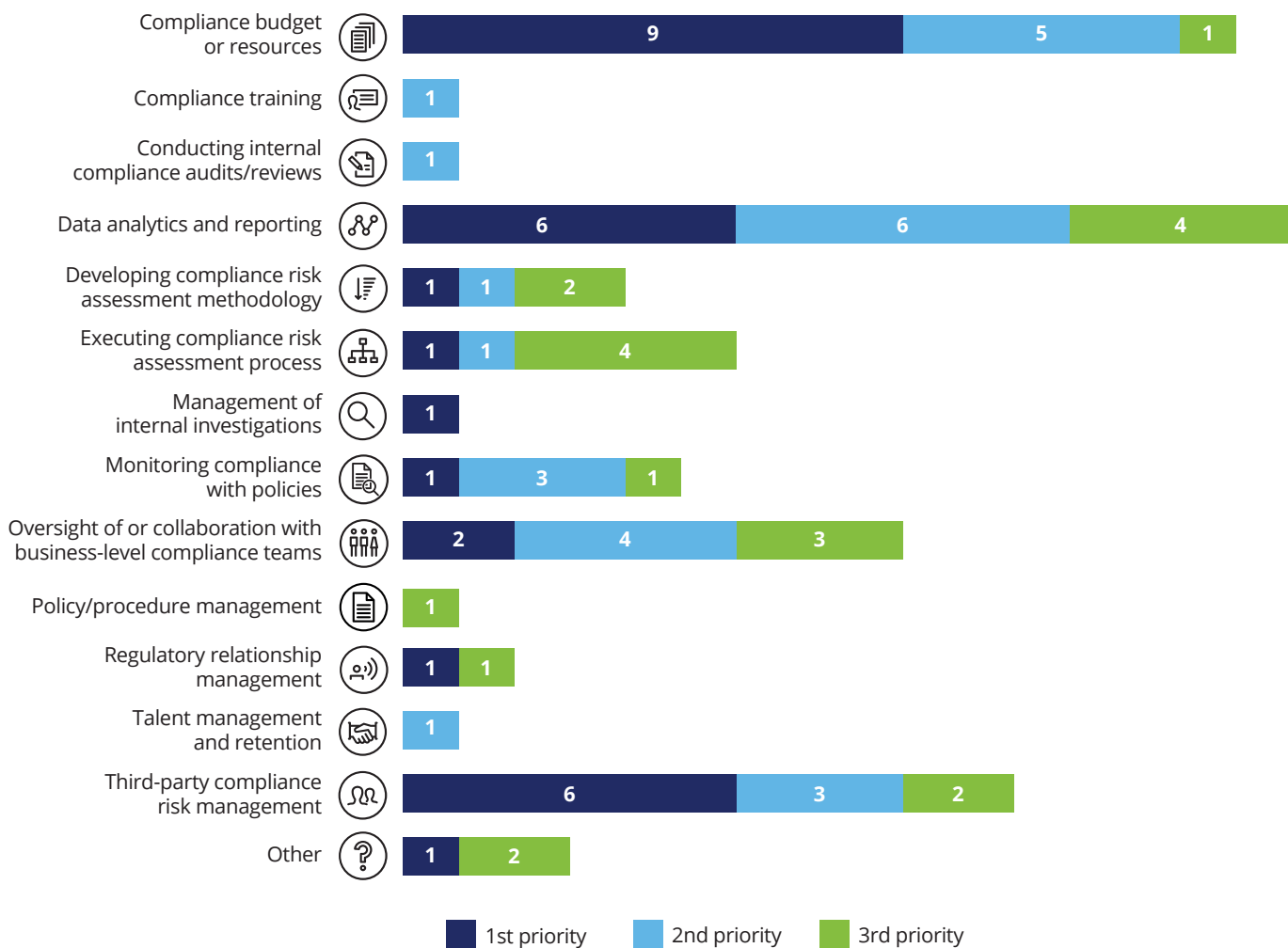
"There is technology out there that's not extremely out of range cost-wise that can help the people in the store understand what compliance activities need to be done and to automate as much as possible. Anything we can do within the compliance team to automate those tasks is greatly appreciated by the business."

Martha Sarra
Vice President and Chief Ethics
and Compliance Officer
The Kroger Co.

Even though most survey respondents say data analytics and reporting are among the top challenges in managing their company's compliance risks (see figure 5), a large majority of respondents say their company's compliance program has only basic technology and data management capabilities (question 45). This may explain why many express no confidence (21 percent)

or only some confidence (36 percent) in the ability of their company's technology platforms and applications to fulfill company compliance responsibilities and reporting requirements (question 46). This also clearly indicates that incorporating more technology is an area of opportunity for retail companies to enhance their compliance programs.

Figure 5. Top challenges in managing the company's compliance risk [Question 29, N=28]



A subset of retailers are doing that by slowly starting to adopt more innovative predictive analytical tools and robotics process automation (RPA)³ or other advanced technology tools for select compliance program components, such as with case/incident management; compliance monitoring, testing, and reporting; employee surveys; tracking legislation and regulations; and third-party risk management (question 47).

“An area that is creating real impact is using analytics measurement and monitoring to determine how we are performing against our ethical culture and compliance expectations. You have to have that capability in the current environment because focusing on culture and compliance is great, but it can also lead to lip service if you aren’t measuring and monitoring how your cultural and compliance efforts are showing up.”

Todd Hartman
Chief Risk & Compliance Officer
Best Buy Co., Inc.

Outsourcing compliance activities is another way for retailers to accelerate the development or improve the efficiency of their compliance programs (questions 30 and 47). For instance, roughly three-quarters of survey respondents say their company outsources or co-sources their employee and ethics helpline. A significant proportion seek outside help for compliance training as well. And, outside vendors provide much of the regulatory change management monitoring that retailers seek.

Looking to the future

Retail companies are at widely varying points in their compliance journeys, spanning the spectrum in terms of compliance program maturity. Retailers’ journeys toward continued maturity of their compliance programs recognize that today’s increasingly global and digitally driven retail environment demands that compliance programs are more than a check-the-box function and a cost of doing business—they are a strategic imperative. Retail companies that have faced compliance challenges in recent years have taken the opportunity to lead through adversity by increasing their scope, visibility, and investment in compliance. They now exhibit many of the attributes associated with more advanced compliance practices and programs across industries.

Beyond their importance in protecting enterprise value, effective programs may even contribute to value creation, a capability that can be a point of differentiation in the marketplace. A structured, programmatic approach to ethics and compliance can help reinforce and activate the imperative throughout the company to help the business collaborate more effectively, make better decisions, and take smarter risks. In this sense, spending wisely on ethics and compliance can represent more than prudent risk management; it can be an investment in building a cohesive, high-performing, and innovative organization that distinguishes itself, and is trusted, in the marketplace.

“Advice for other compliance officers: Keep up the good work. Changes are coming. It’s an exciting time to be a chief compliance officer in a retail organization. If you want to be proactive and not reactive, watch the health care and financial services industries, learn from them, and implement programs that are form-fit for retail.”

Martha Sarra
Vice President and Chief Ethics and Compliance Officer
The Kroger Co.

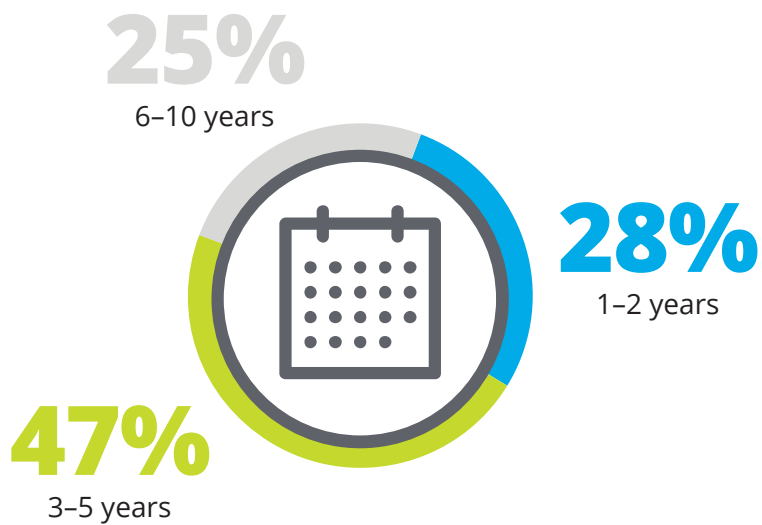
³ RPA is a class of software that can mimic the way people do it with applications, and cognitive intelligence-based applications can help to carry out non-routine work.

Appendix

Question 2. What is your title? N=28



Question 3. How long have you been in your current role? N=28



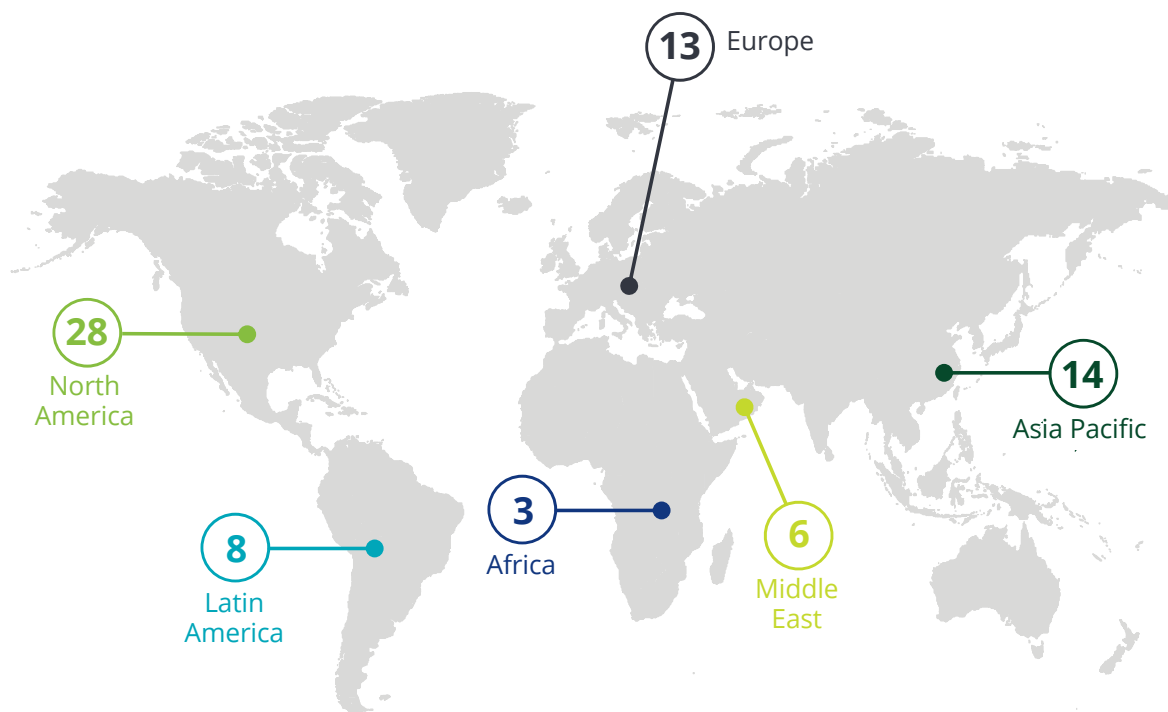
Question 4. Please indicate your most significant functional experience prior to your current compliance role. N=28



Question 5. In what retail sub-sector does your business operate? (Select all that apply.) N=28

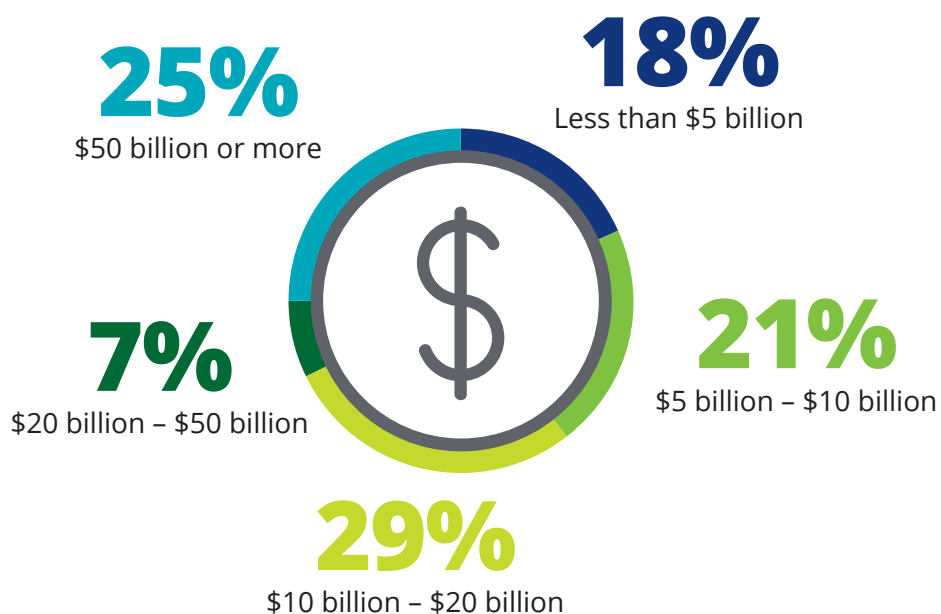


Question 6. In what geographic region(s) does your company do business? N=28*



*Respondents could choose multiple regions and, as such, the total is greater than the number of respondents.

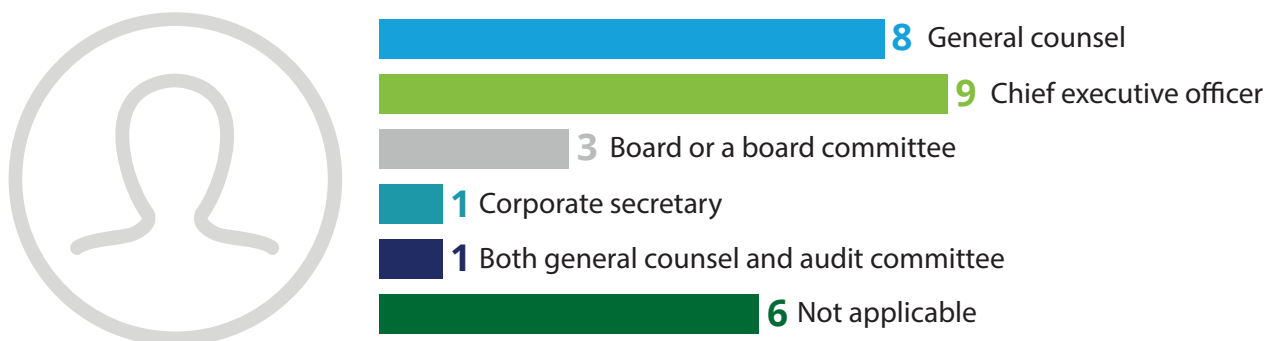
Question 7. What is your company's annual revenue for the most recent fiscal year? N=28



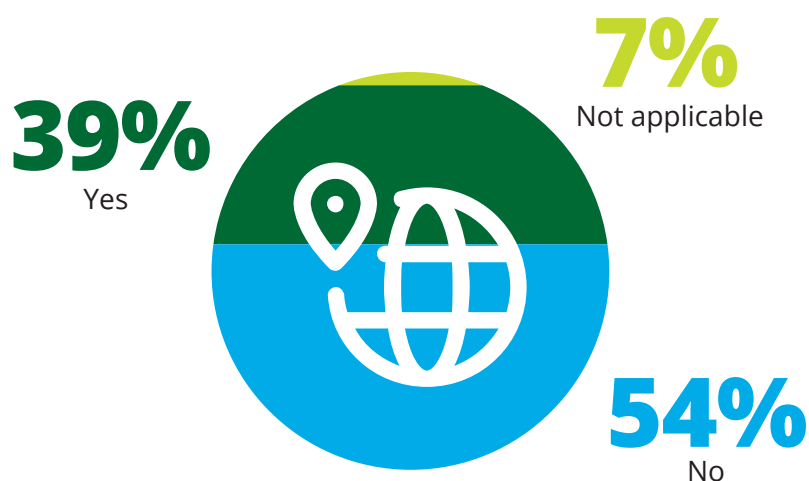
Question 8. At your business, the designated chief compliance officer (CCO): N=28



Question 9. To whom does the designated chief compliance officer directly report? N=28



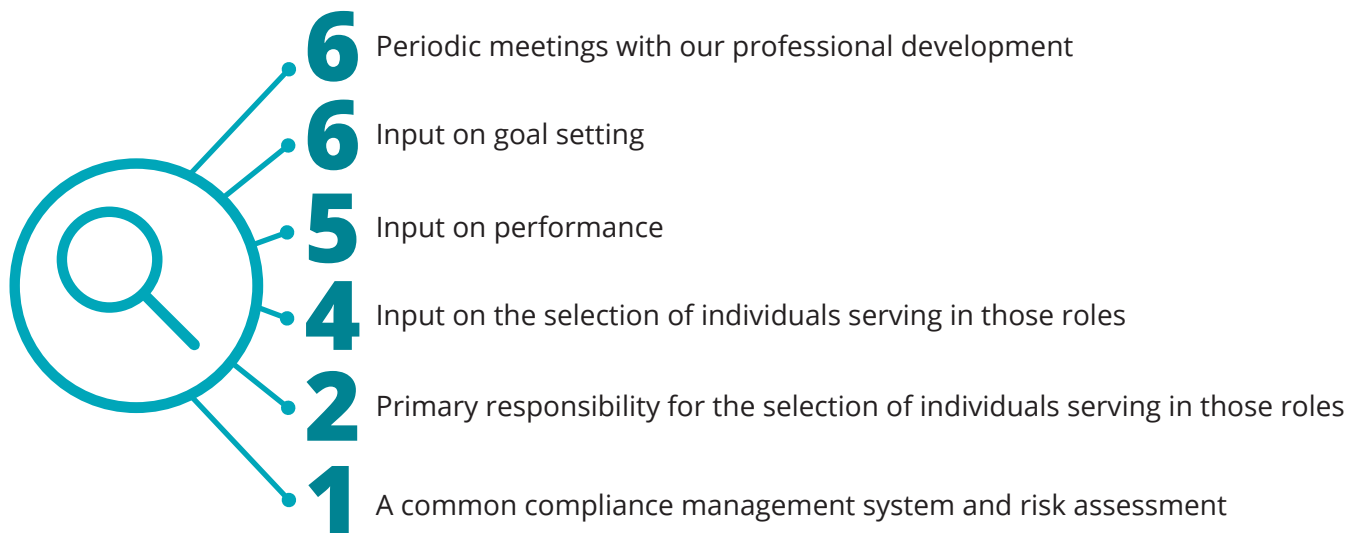
Question 10. Does the company have designated compliance officers in its subsidiaries/business units/geographies? N=28



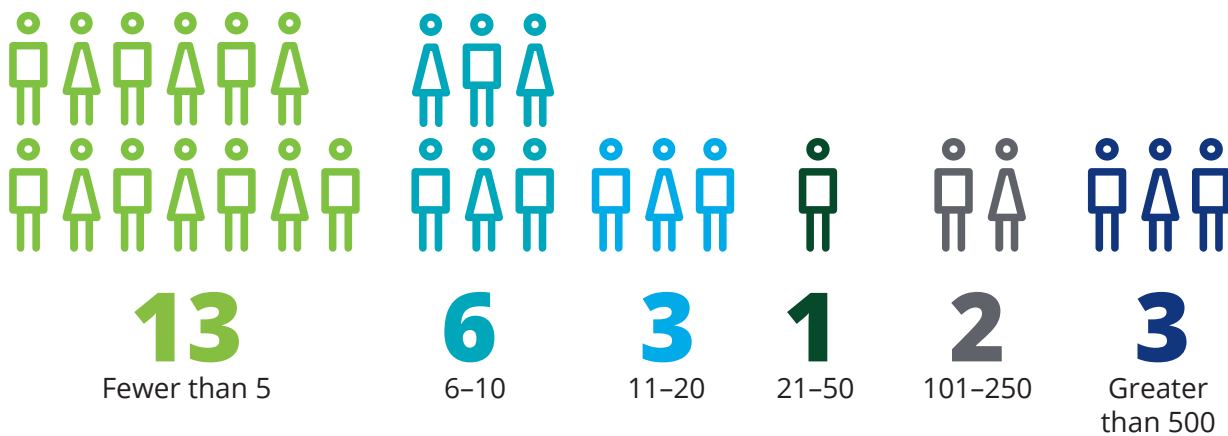
Question 11. To whom do these compliance officers report directly? N=11



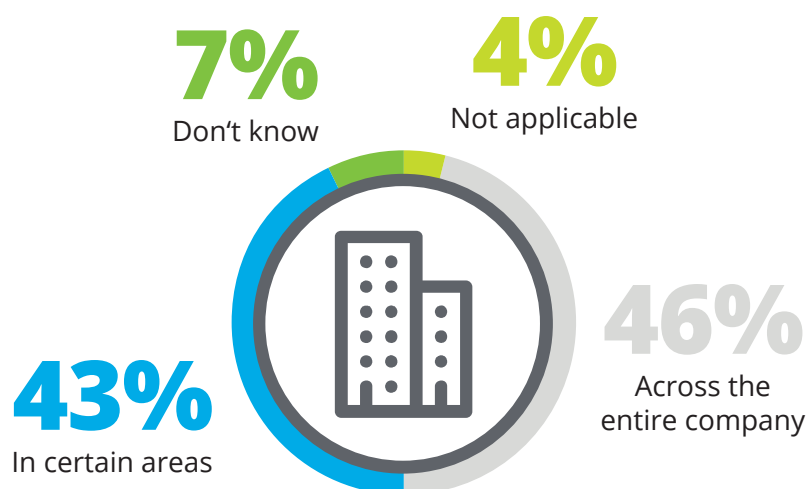
Question 12. What type of oversight does the enterprise CCO provide to the subsidiary/business unit compliance officers? (Select all that apply.) N=7



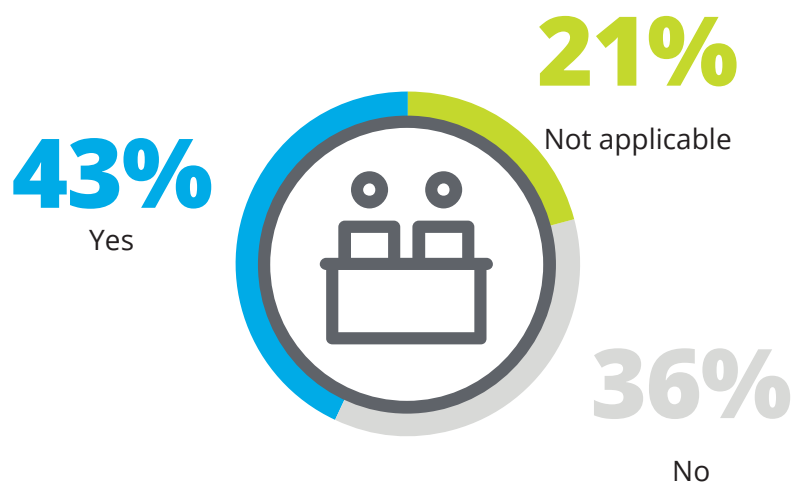
Question 13. What is the total number of full-time people within your company focused specifically on designing, implementing, and/or maintaining the company's ethics and compliance program? N=28



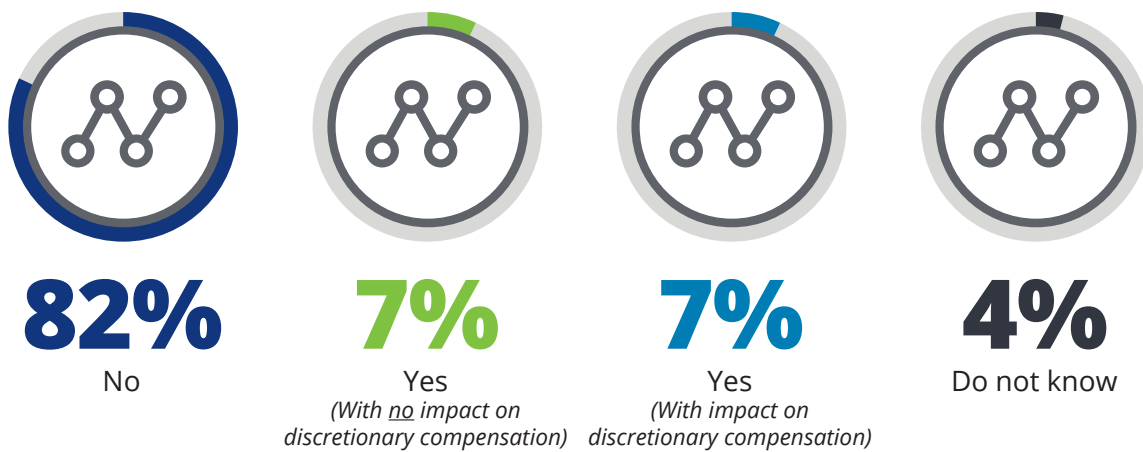
Question 14. To what extent do you perceive that the compliance function is viewed across the company as a partner to the business units? N=28



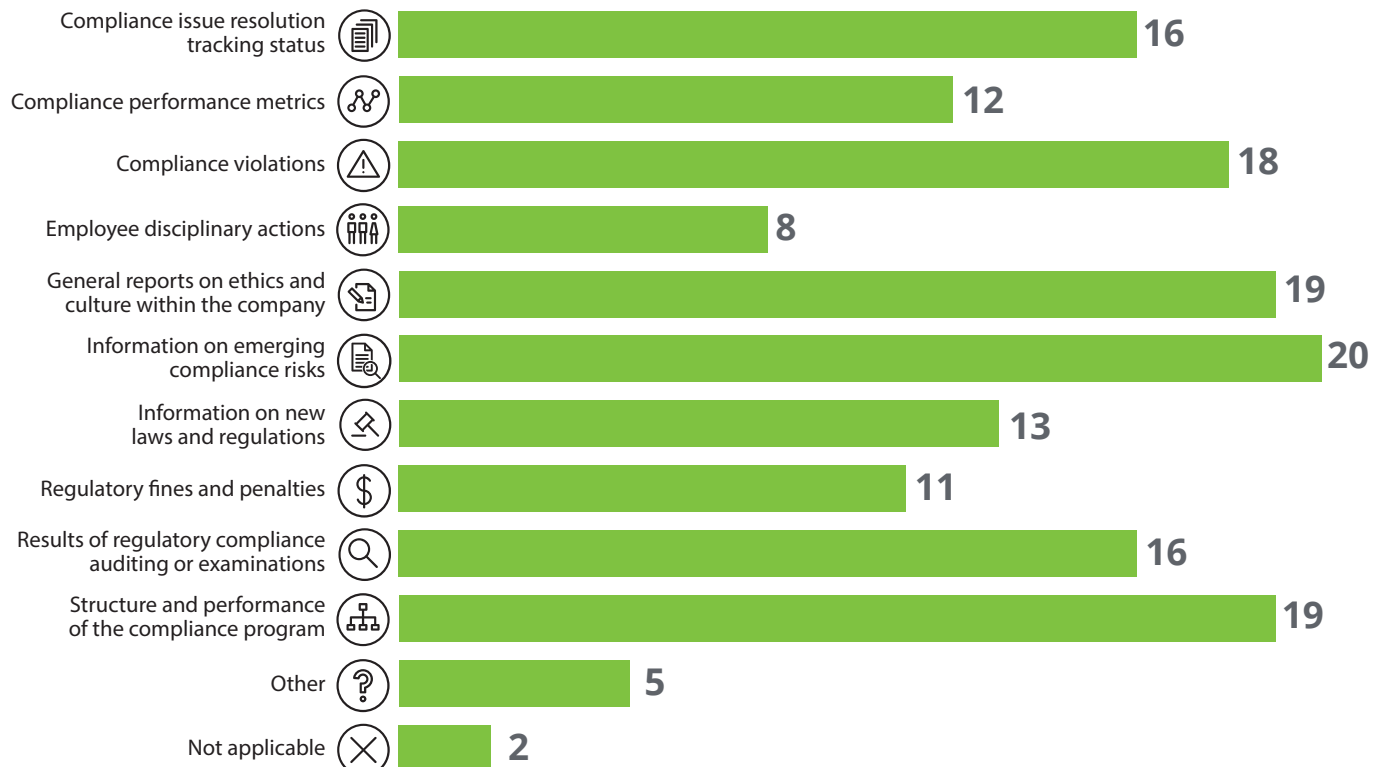
Question 15. Does the CCO hold a seat on the executive management committee? N=28



Question 16. Are compliance-related metrics included in the evaluation of senior management's performance? N=28



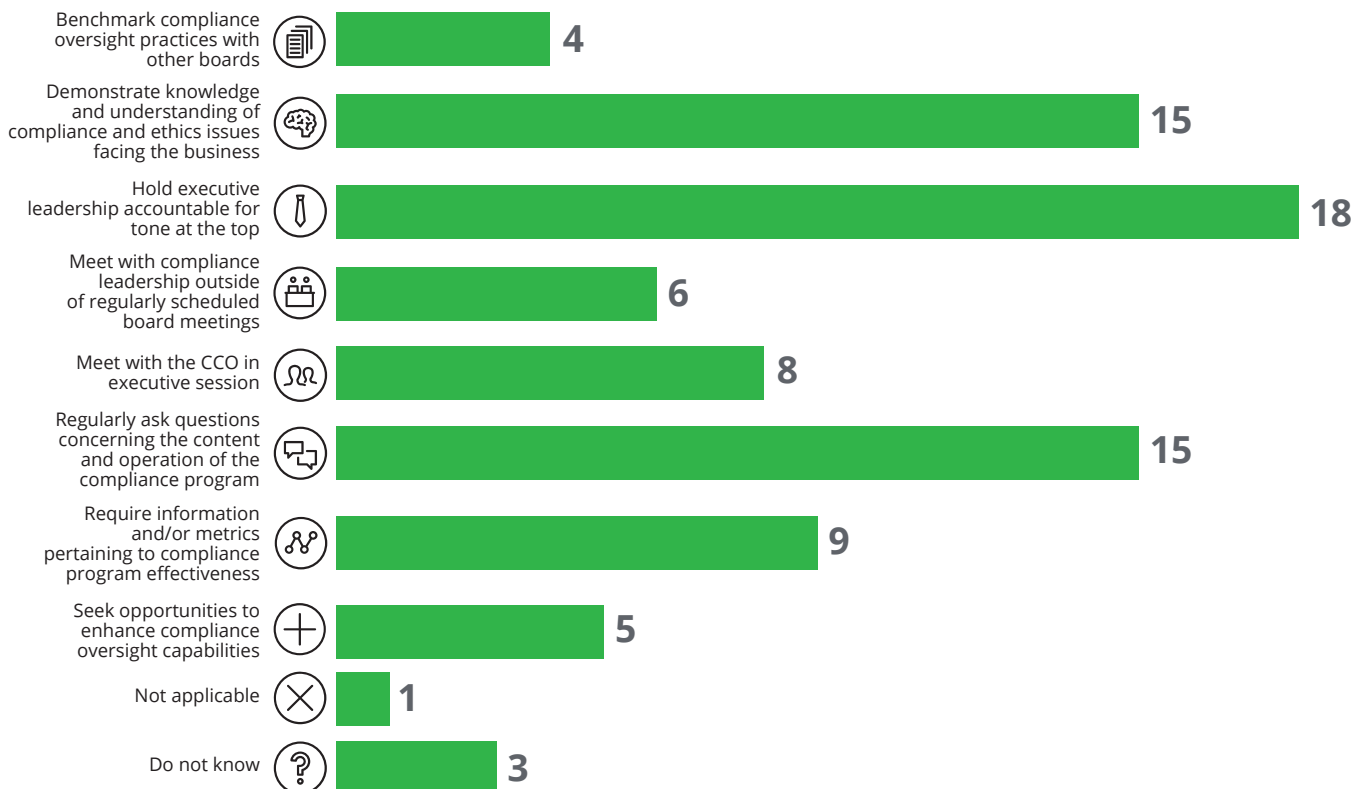
Question 17. What type(s) of compliance program reporting does your CCO provide to the board and/or executive management? N=28



Question 18. Which of the following activities does your company undertake to promote a commitment to ethical conduct and compliance with the law? N=28



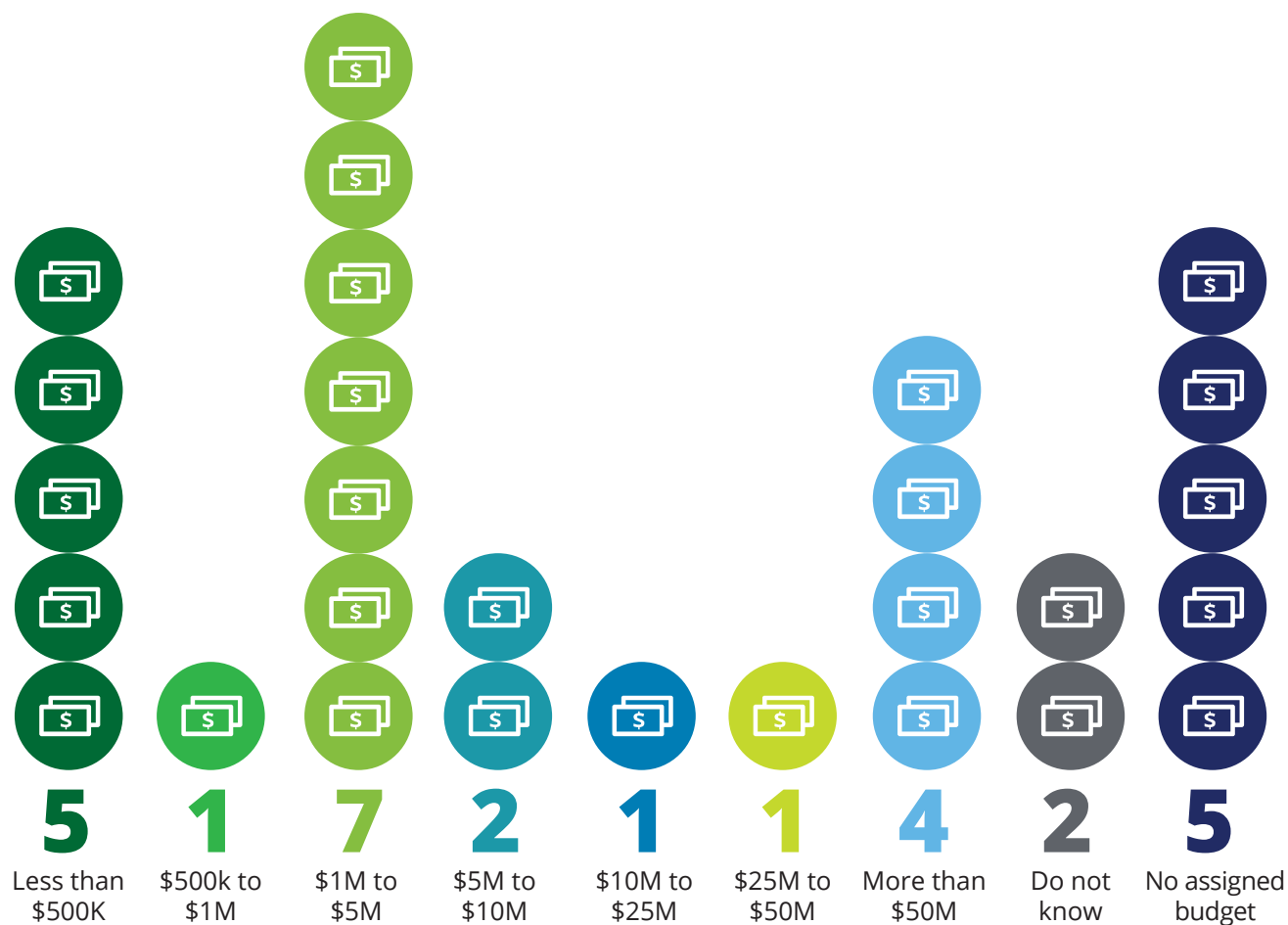
Question 19. Which of the following compliance-related activities and/or behaviors does your board (or relevant board committee) engage in consistently? (Select all that apply.) N=28



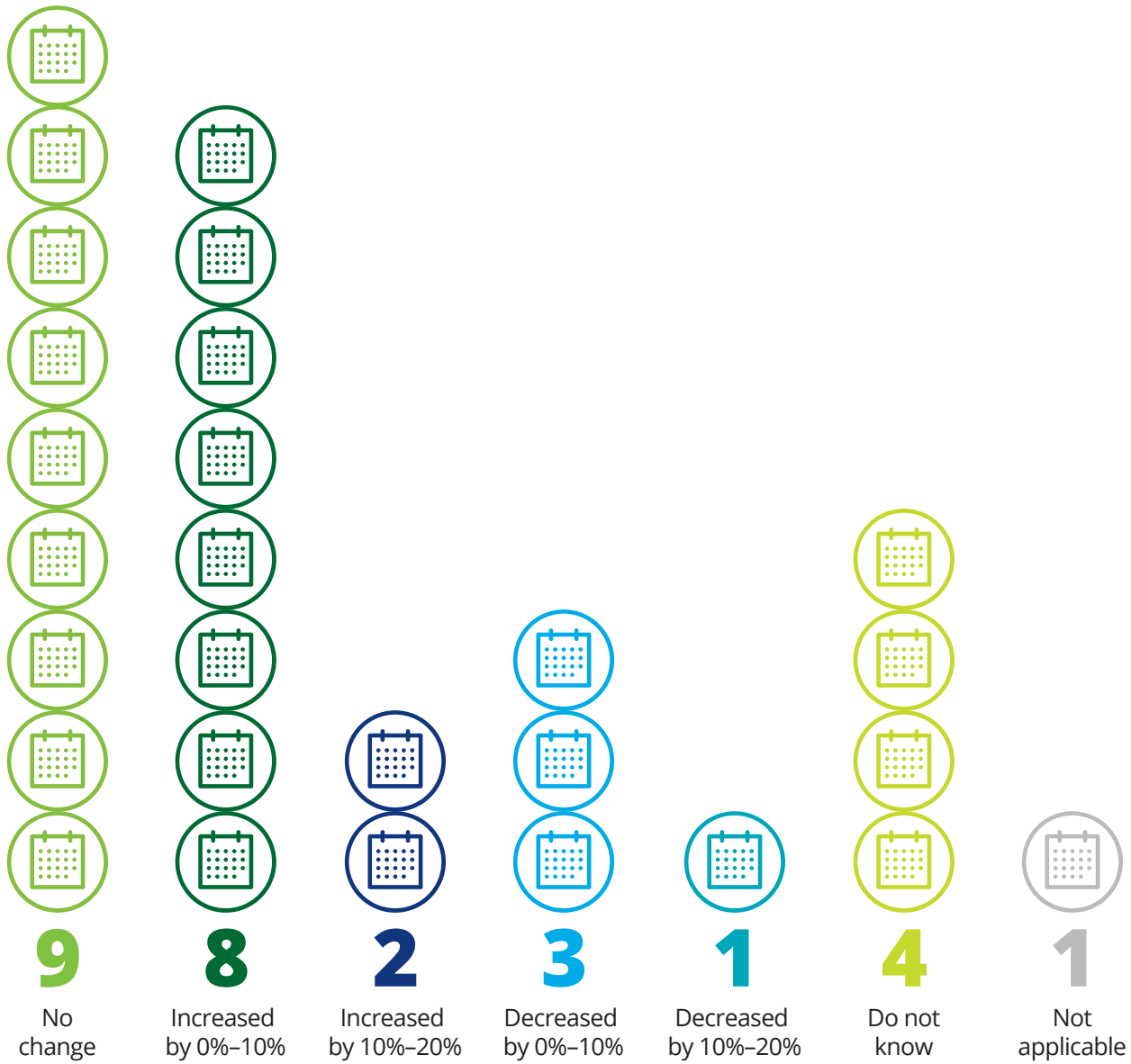
Question 20. Does the board (or relevant board committee) receive continuing education opportunities related to ethics and compliance? N=28



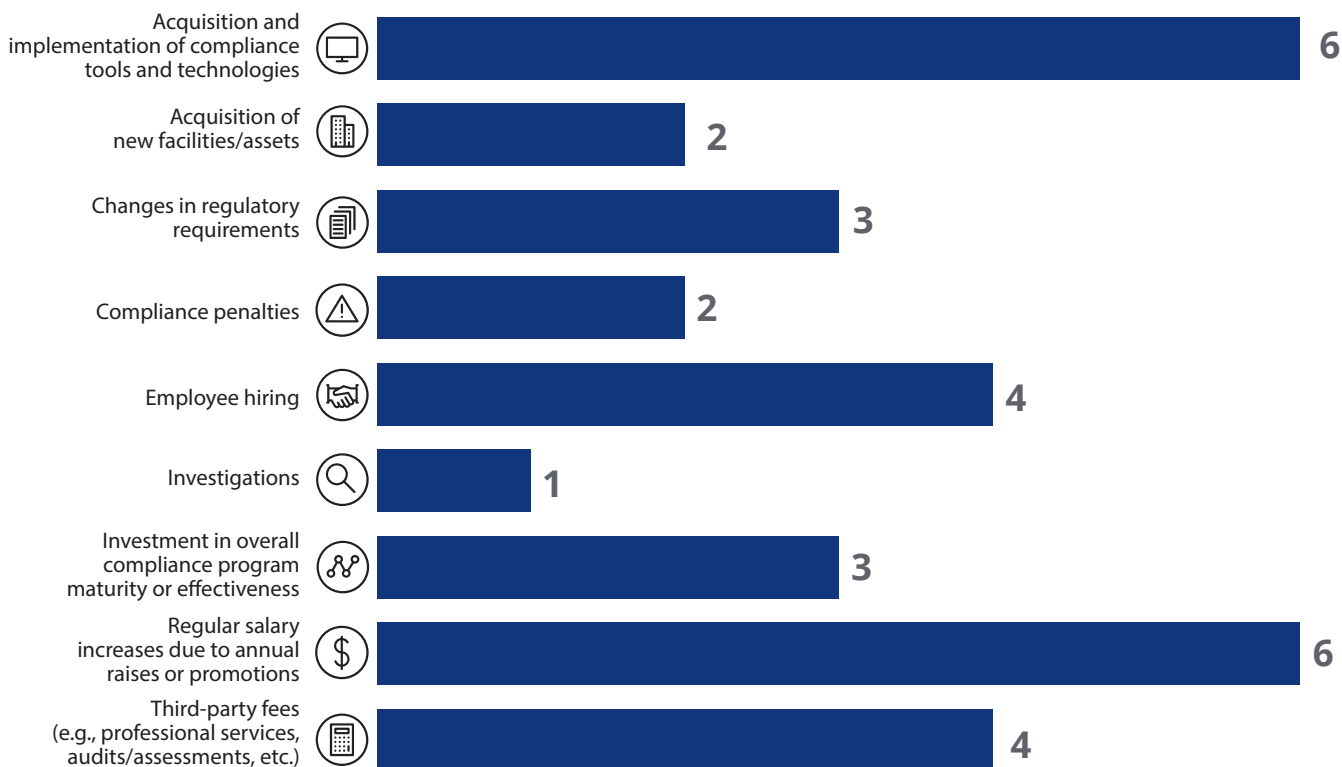
Question 21. What is the 2017 total budget for enterprise-wide compliance function(s) (e.g., processes, salaries, technology)? N=28



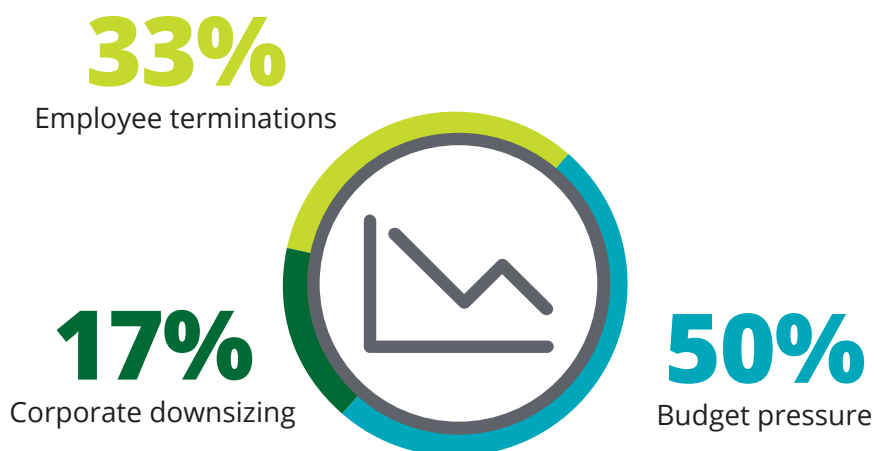
Question 22. How has your company's budget for compliance activities changed over the past 12 months?
N=28



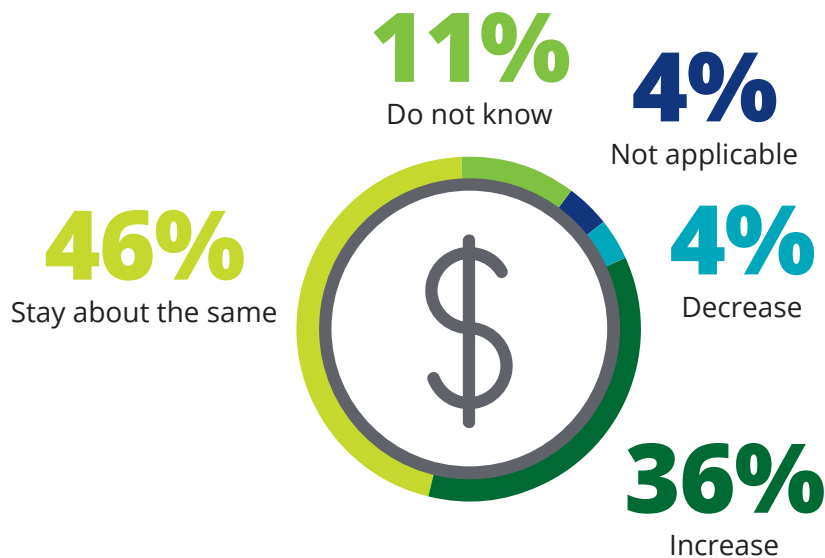
Question 23. Please select the primary factors that influenced the budget increase. (Select all that apply.)
N=10



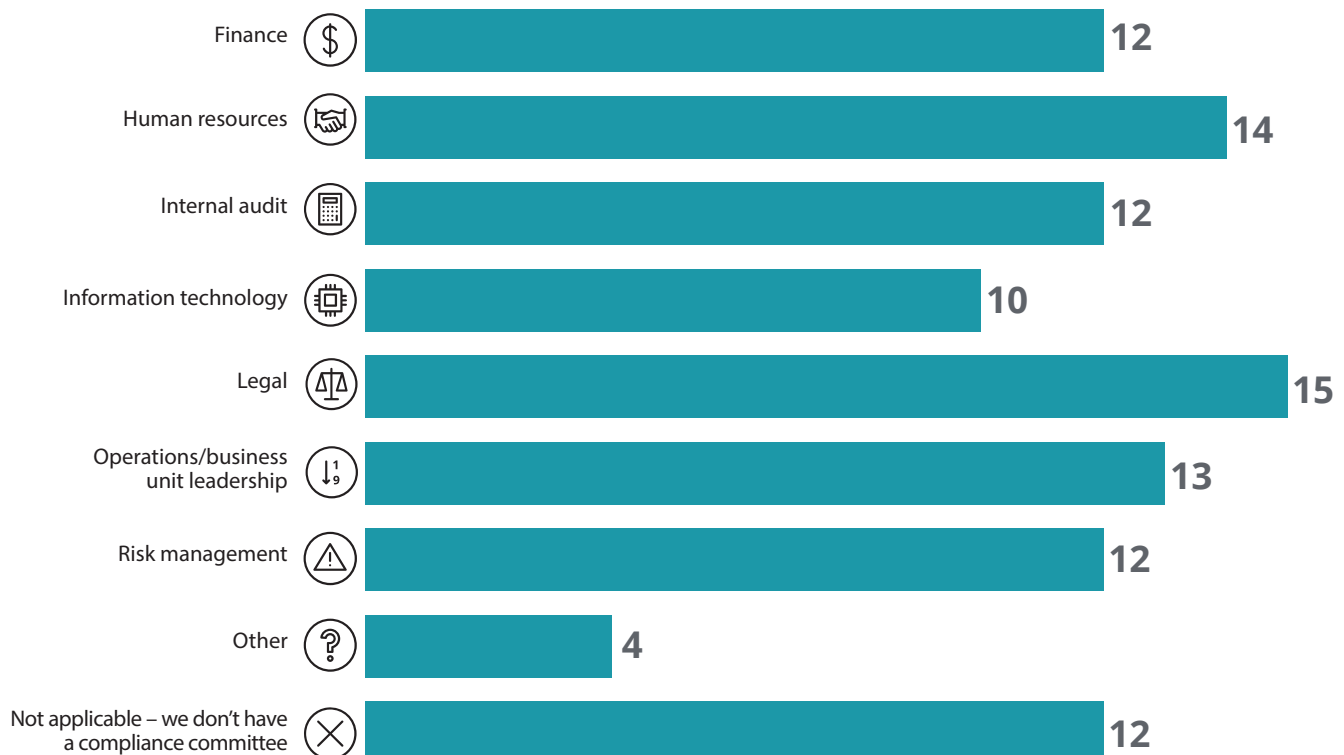
Question 24. Please select the primary factors that influenced the budget decrease. (Select all that apply.)
N=4



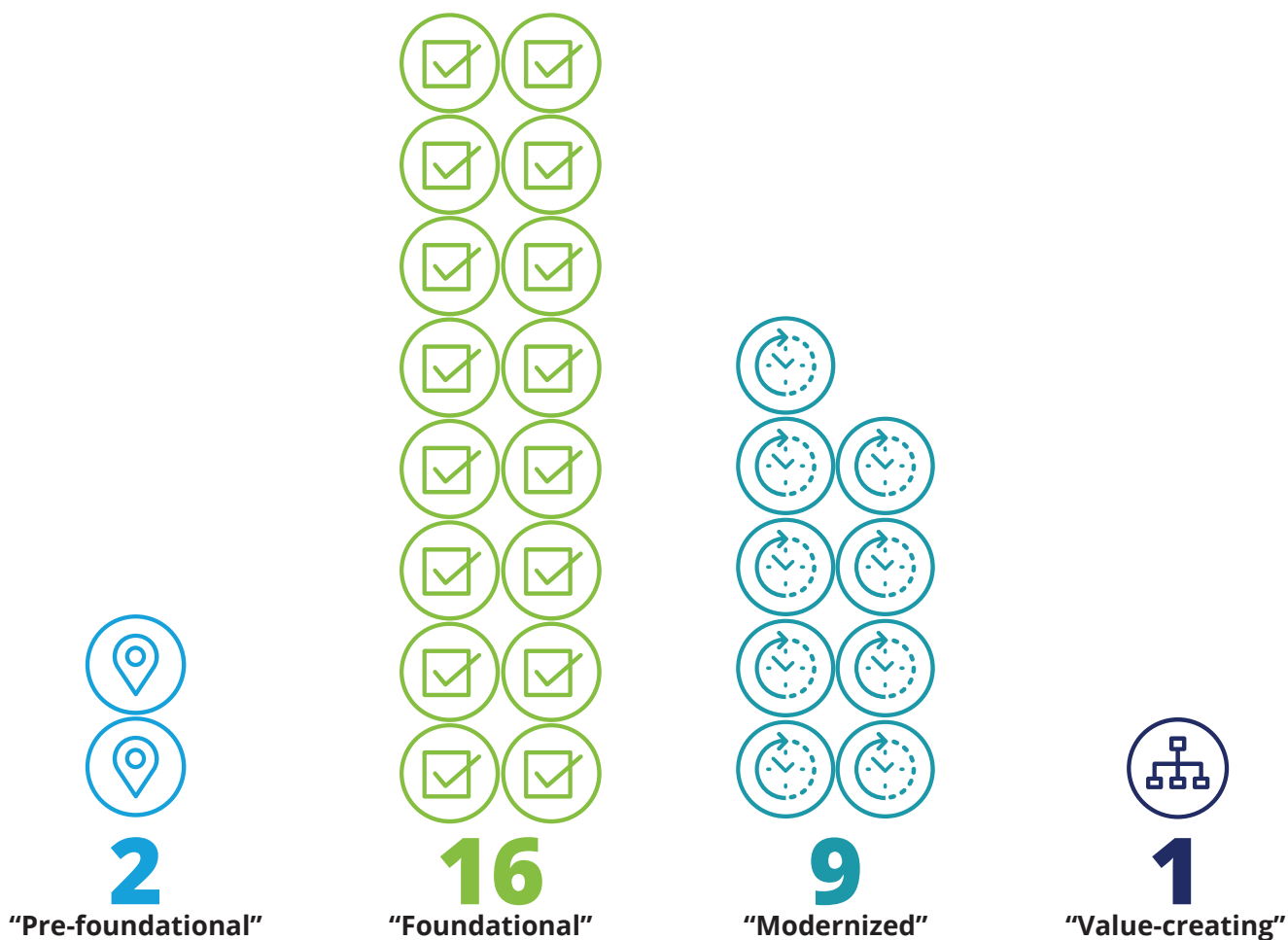
Question 25. In 2018 and beyond, do you expect the total budget to: N=28
(Due to rounding, total exceeds 100%)



Question 26. Which of the following departments or functions serve on the management-level compliance committee? (Select all that apply.) N=28



Question 27. Which of the following most accurately describes the current state of maturity of your compliance program? N=28



"Pre-foundational" – Program is in early stages of development and still establishing core elements prescribed in official guidance

"Foundational" – Program meets core requirements and expectations; basic operating model identifies roles and responsibilities and includes methodologies to assess, prioritize, and mitigate compliance risks

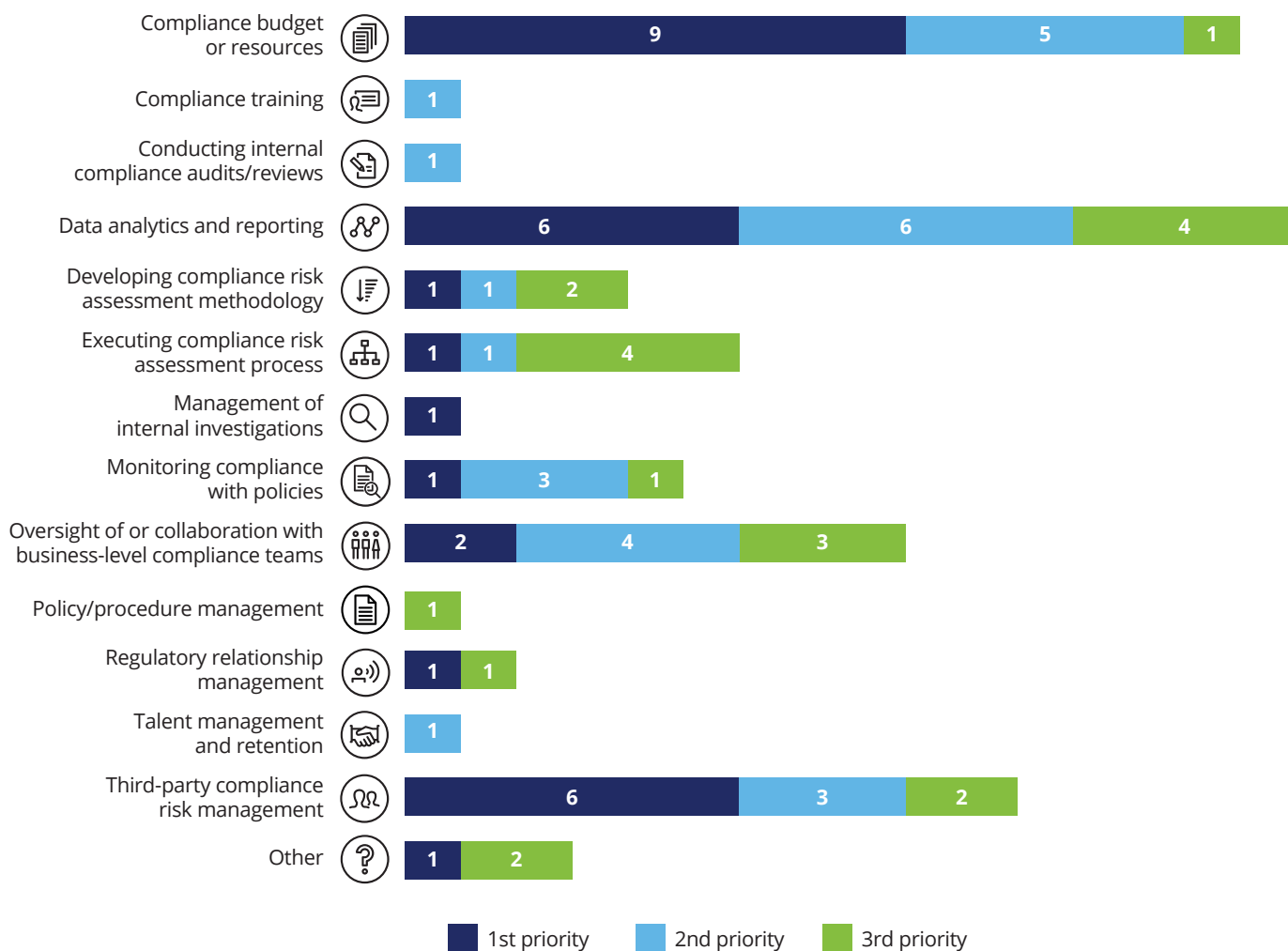
"Modernized" – Program reflects elevated, strategic view of compliance; demonstrates enhanced synergies with business units, which promote efficiencies, and rationalized oversight and execution processes; use of advanced analytics

"Value-creating" – Program has achieved advanced level of sophistication with optimized oversight and execution processes; close alignment with overall business strategy with program value articulated through measurable return on investment (ROI)

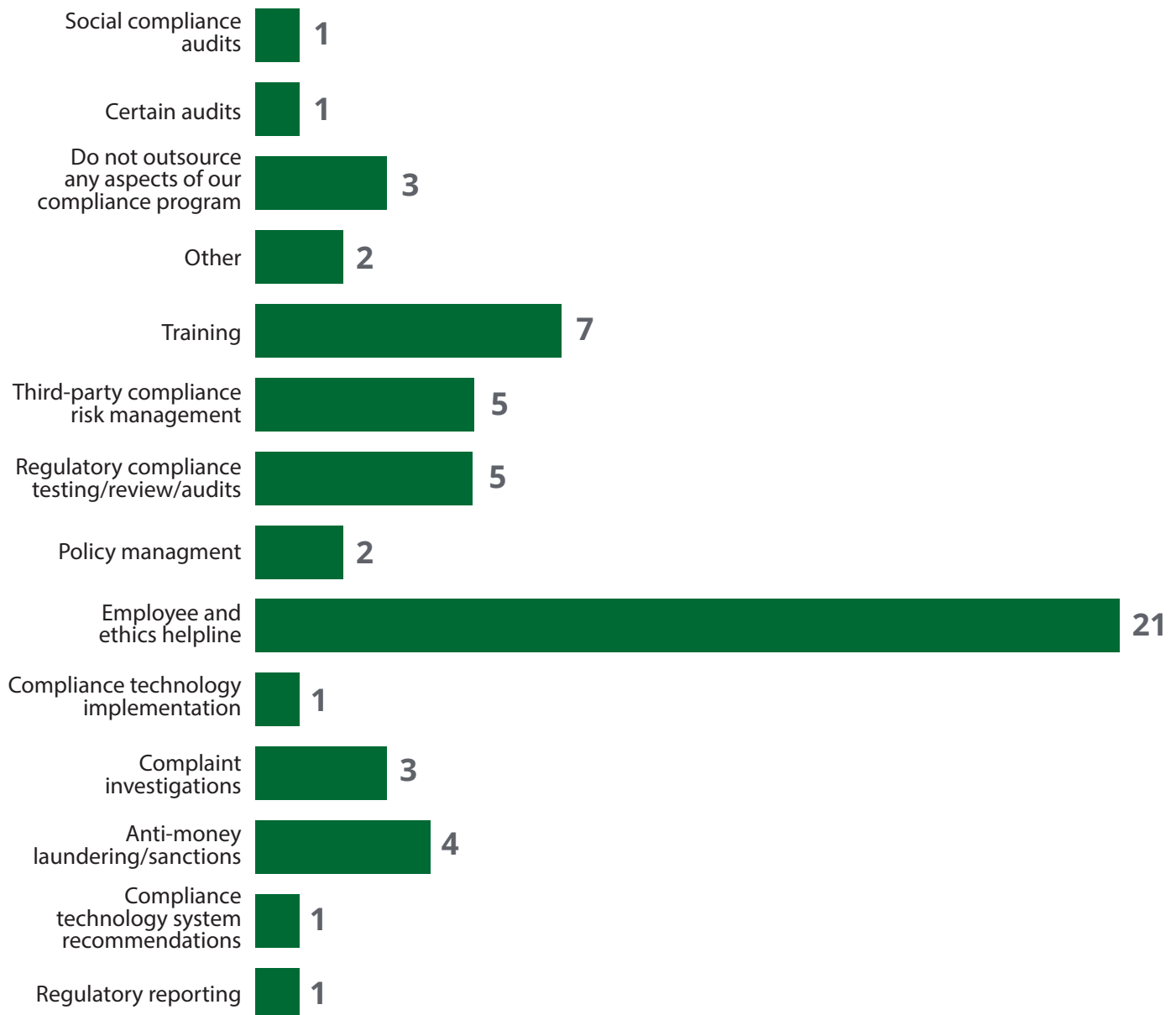
Question 28. For which of the following is the compliance function responsible? (Select all that apply.) N=28



Question 29. Which of the following present significant challenges in managing your company's compliance risks? (Please select your top three in order of priority.) N=28



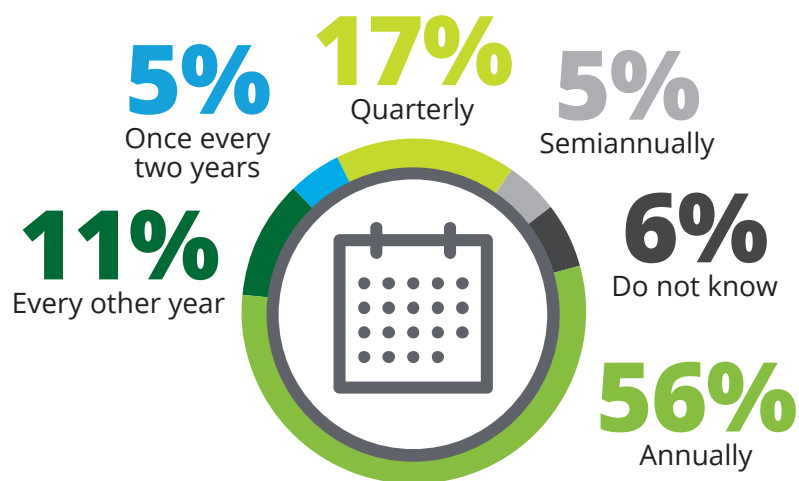
Question 30. Which of the following compliance activities do you outsource or co-source? (Select all that apply.) N=28



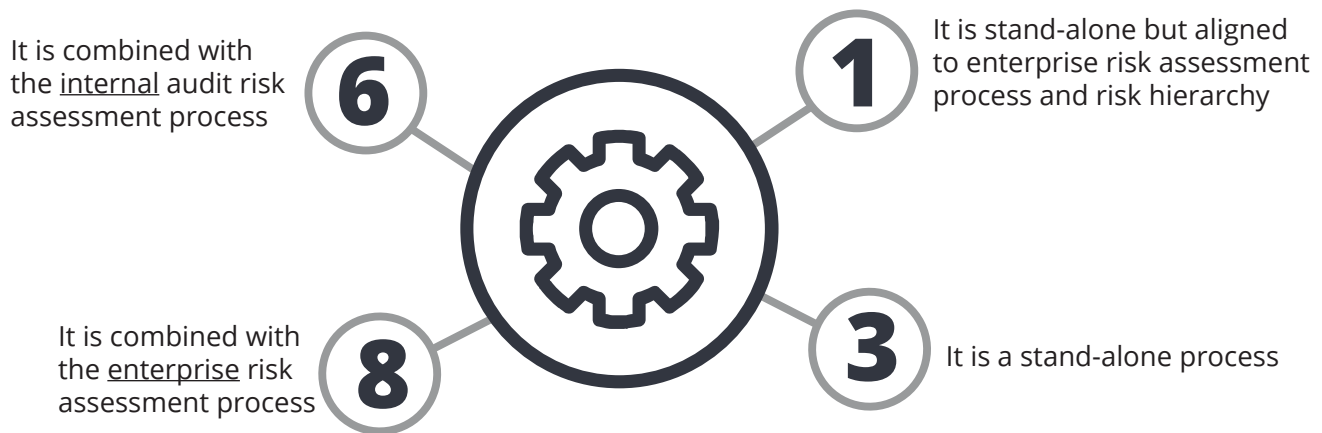
Question 31. Does your company perform an enterprise-wide compliance risk assessment? N=28



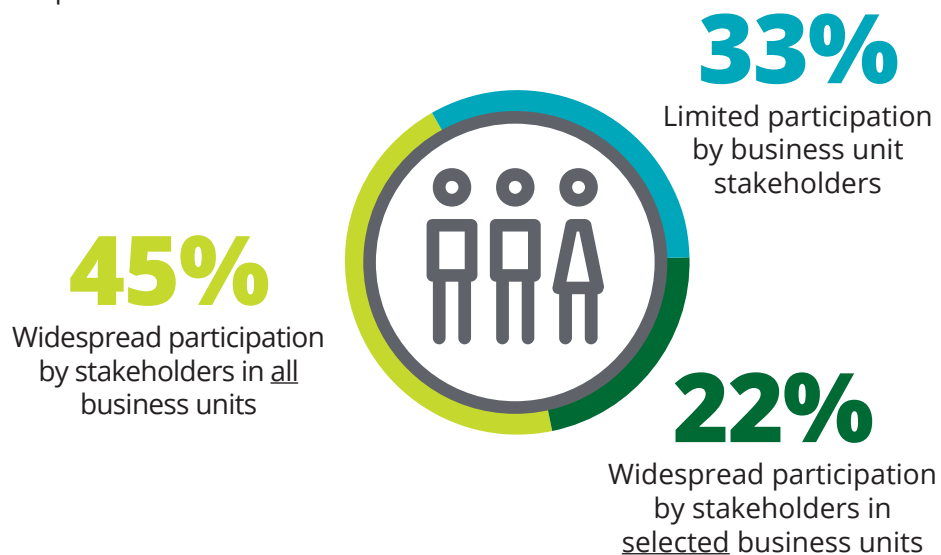
Question 32. How often do you perform an enterprise-wide compliance risk assessment? N=18



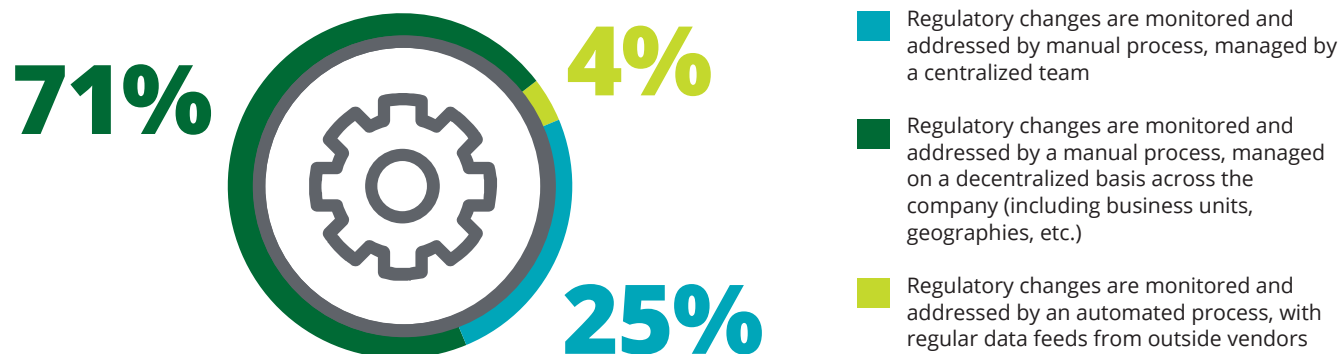
Question 33. Please select the statement that best reflects the company's approach to performing enterprise-wide compliance risk assessments: N=18



Question 34. Which of the following best describes company participation in the enterprise-wide compliance risk assessment? N=18



Question 35. Please select the statement that best reflects the company's approach to regulatory change management: N=28



Question 36. How much is the changing regulatory landscape driving you to reassess your third-party relationships, including joint ventures, suppliers, distributors, agents, or other business relationships? (Select all that apply.) N=28

We are increasing ongoing oversight (e.g., auditing, monitoring) on a prospective basis and strengthening our front-end diligence for new relationships

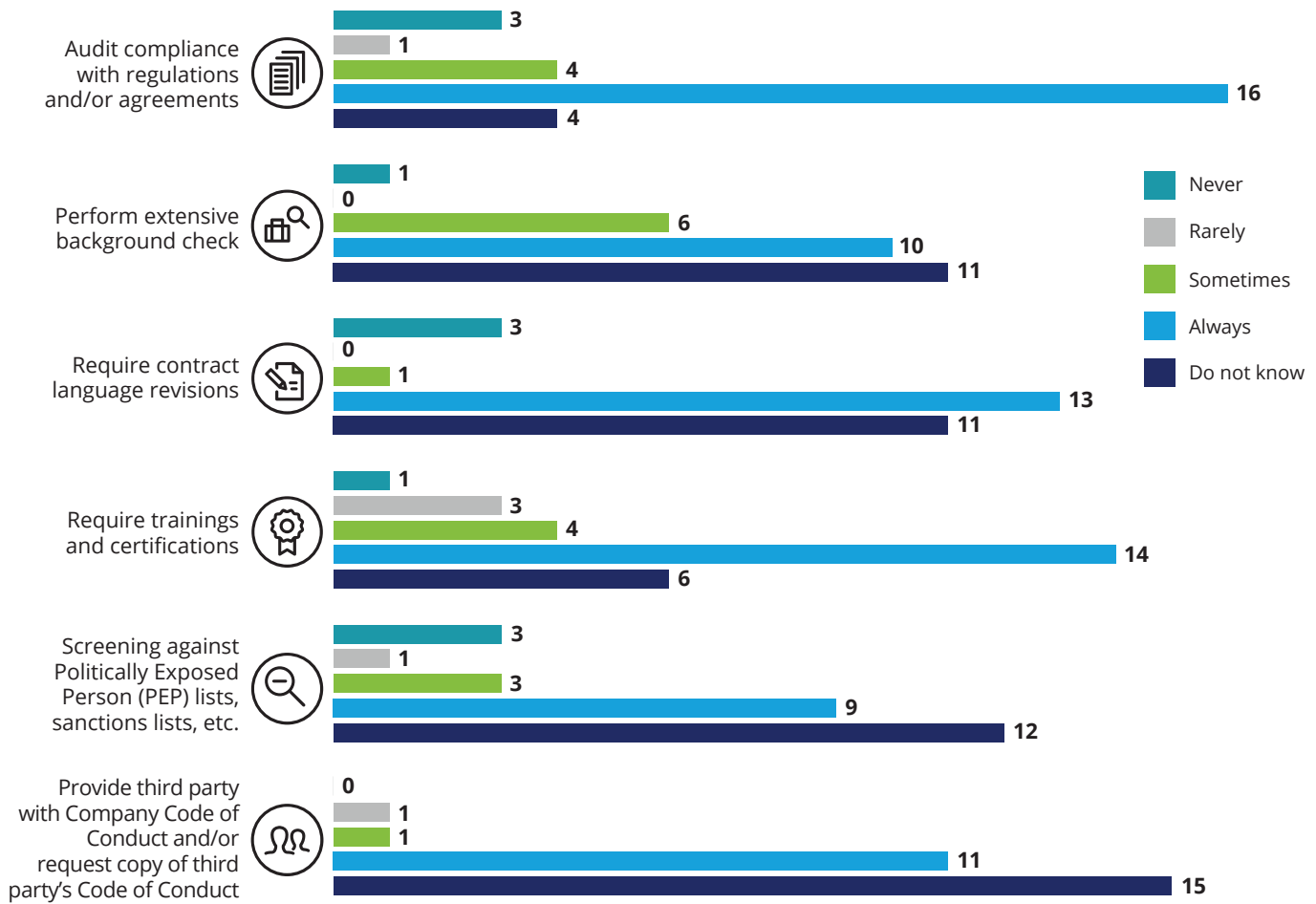


We are reassessing some or all of our existing business partners based on our determination of underlying risk

We are bringing business activities under more direct control and generally reducing our third-party relationships

Do not know

Question 37. Which of the methods do you use to identify and manage compliance risks related to third-party relationships? N=28



Question 38. What risk factors do you use to risk-rank third parties? (Select all that apply.) N=28



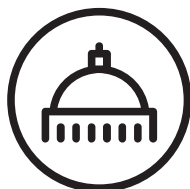
18

Dollar value of
goods or services



24

Geographic locations
(using Transparency
International's Corruption
Perceptions Index or other tools)



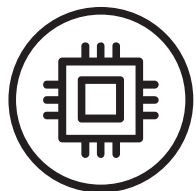
18

Third-party interaction
with government
officials on behalf
of the company



21

Type of service or
product provided



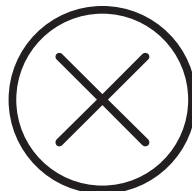
1

Privacy and data
information access,
technology, identity
of third party



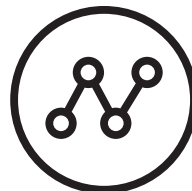
2

Do not know



2

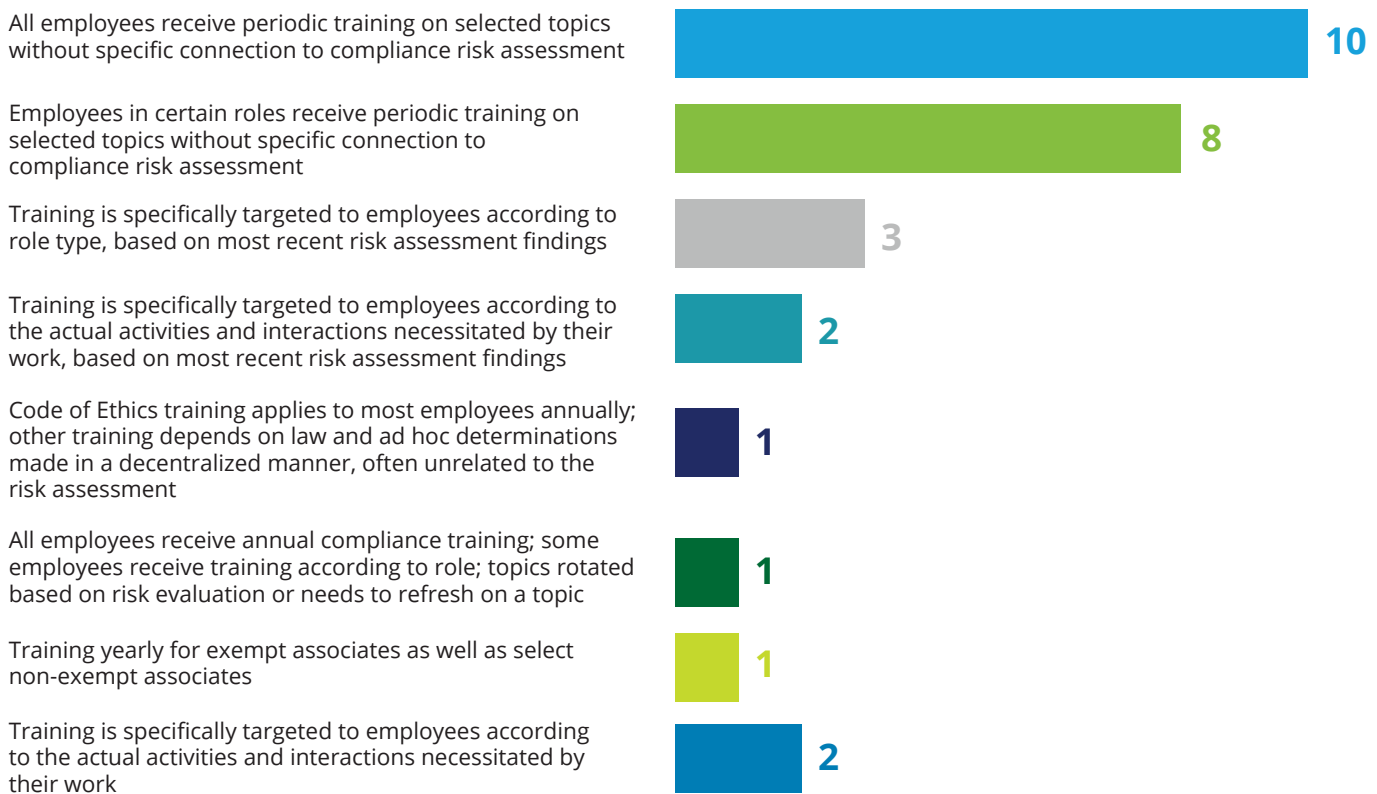
Not applicable



1

Any personally
identifiable information
(PII) given to the
third party

Question 39. On what basis do you assign compliance training to employees? N=28



Question 40. What topics are included as part of your training curriculum? (Select all that apply.) N=28



Question 41. What formats are used for training and delivery? (Select all that apply.) N=28



22

Live, in-person training led by compliance staff



9

Live, in-person training led by business managers



4

Live, in-person training led by a third party



4

Live training held via webinar



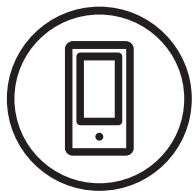
24

Web-based training



5

Interactive/gamification



4

App-based training



1

Skype

Question 42. Do you measure the effectiveness of your compliance program? N=28

61%

Yes

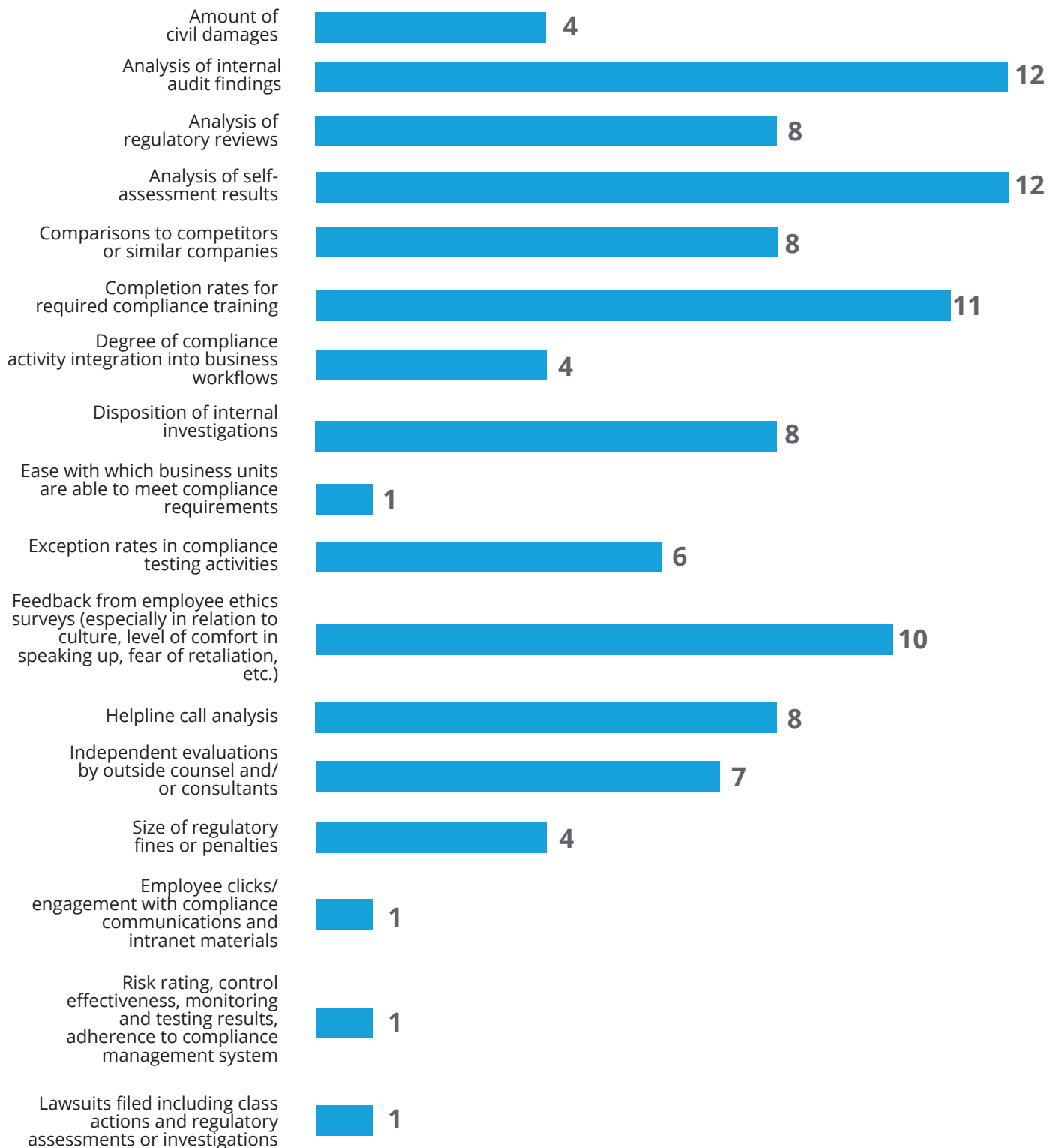
4%

Do not know

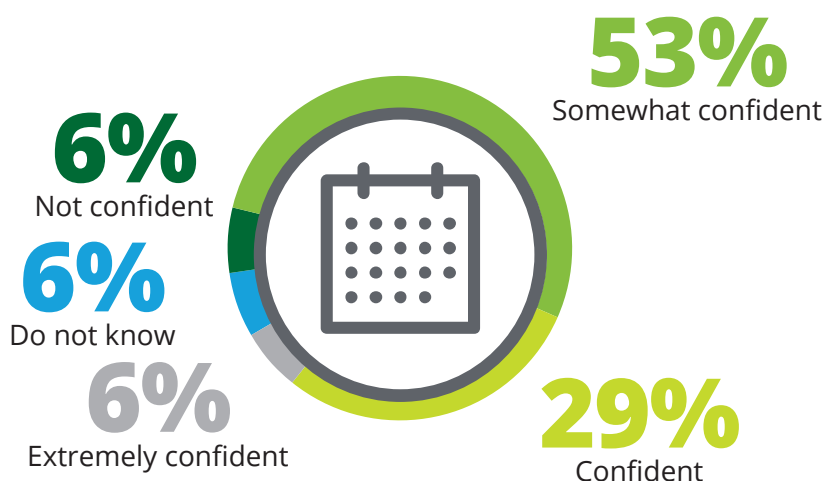
35%

No

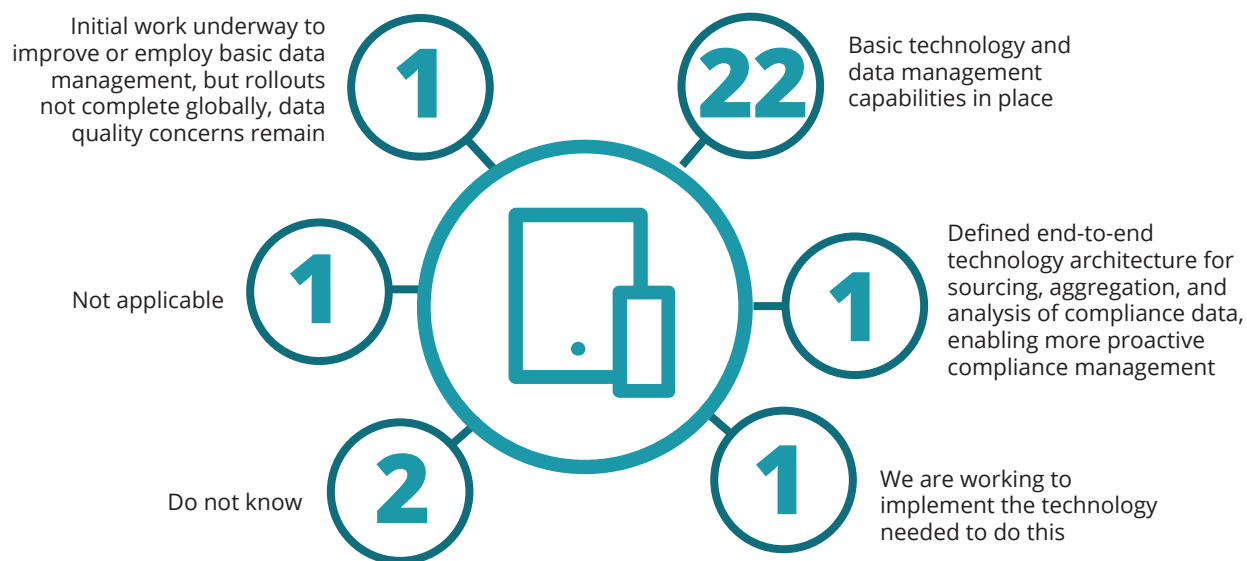


Question 43. How do you measure compliance effectiveness? (Select all that apply.) N=17

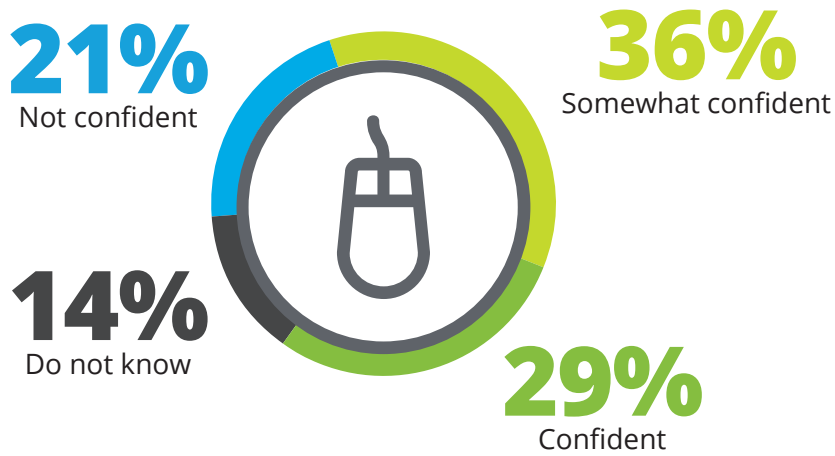
Question 44: How confident are you that these metrics give you a true sense of how well the program is working? N=17



Question 45. In what ways is your compliance program utilizing technology to help fulfill compliance responsibilities and reporting requirements? N=28



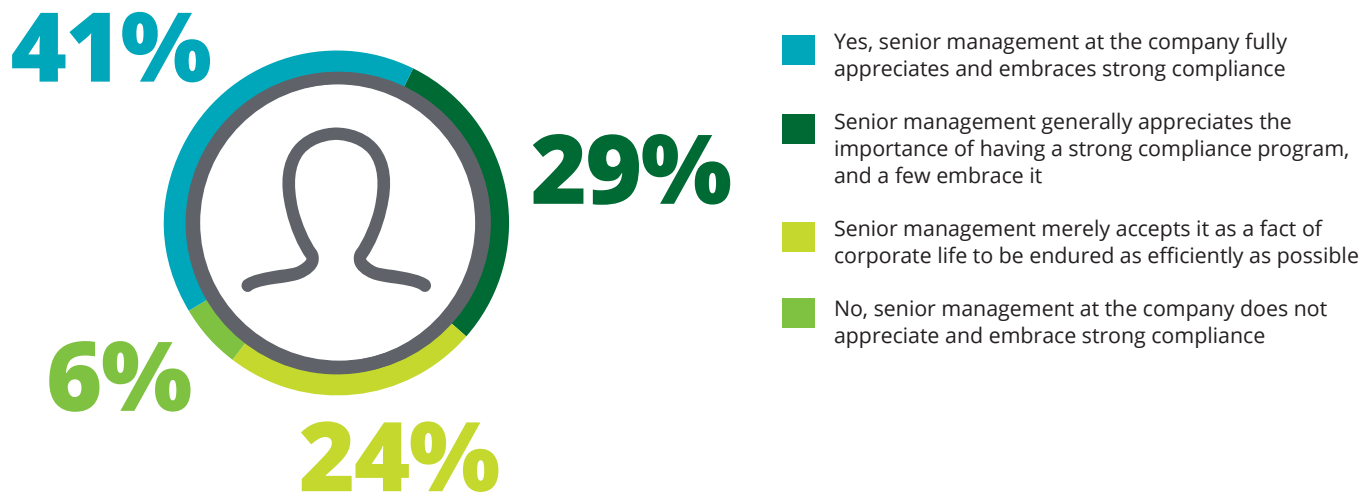
Question 46. How confident are you in the ability of your technology platforms and applications to fulfill your compliance responsibilities and reporting requirements? N=28



Question 47. What categories of tools and technologies, if any, are used to support the following key components of your compliance program? (Select all that apply.) N=28

	No technology or tool is used	Desktop tools (word processing, spreadsheets, etc.)	Internally developed tools	ERP technologies and tools	Other third-party technologies and tools	Use of predictive analytical tools	Use of robotic process automation or other advanced technology tools	Do not know	N/A
Case/incident management	1	4	4	2	23	1	0	1	0
Compliance monitoring, testing, and reporting	4	14	7	5	9	1	0	0	0
Compliance risk assessments	4	14	4	3	4	0	0	1	2
Conflicts of interest	9	10	4	1	6	0	0	0	0
Document management (e.g., policies, procedures, templates)	4	12	9	4	7	0	0	0	0
Employee surveys	1	3	4	0	23	1	0	1	1
In-store compliance audits and reviews	3	7	9	1	10	0	0	4	1
Measuring effectiveness of compliance program	11	12	13	1	3	0	0	1	1
Policy development	7	15	6	0	1	0	0	1	0
Regulatory examination issue tracking	8	8	4	1	3	0	0	3	2
Third-party risk management	2	5	6	4	16	0	1	3	0
Tracking legislation or regulation	9	7	3	1	8	3	0	3	0
Training (e.g., delivery, testing, and tracking)	1	7	12	4	15	0	0	1	0

Question 48. Do you believe senior management at your company appreciates and embraces strong compliance, or merely accepts it as a fact of corporate life to be endured as efficiently as possible? N=17*



Question 49. What do you foresee as your biggest compliance challenge currently? In the future? N=18*



* Question was identified in the survey as optional and allowed respondents to provide an open-ended response. Responses provided were analyzed and organized accordingly.



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