

EMERGING RISKS FROM NON-FINANCIAL REPORTING



A White Paper

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*A Resource for Internal Auditors and Others Interested in
Non-Financial Performance and Reporting*



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Emerging Risks: Non-Financial Reporting (What's Internal Audit to Do?)

1.0 Introduction, Objectives, and Polling Questions

The objectives of this white paper are to demonstrate:

- Why Non-Financial Reporting (NFR) warrants attention from Internal Audit (IA); and
- How IA can provide value to organizations by addressing NFR.

To do so, the paper presents highlights of selected NFR drivers and frameworks, perspectives on risk assessment, and provides suggestions on initial focus areas.

At a recent presentation to internal auditors from a cross-section of industries, Informal polling questions revealed that:

- Fewer than 10% had done an audit of NFR, Sustainability, environmental, social, or related issues
- Fewer than 20% had considered it in an annual risk assessment
- Fewer than 10% felt they could describe NFR to their CAE or the Board
- About one in six had heard a presentation on the topic before. [Of these, most had heard other presentations I have made at other IIA meetings throughout California and the U.S.]



Because the NFR field is changing so fast, this paper focuses much content on developments, trends, and emerging risks that have arisen just since January 1, 2016. That is a period of only about 15 months!



2.0 SELECTED NON-FINANCIAL REPORTING DRIVERS

Most of us know that the Environmental Protection Agency promulgates and enforces regulations on environmental quality. The Occupational Safety and Health Administration (OSHA) does the same for workplace safety. Equal Employment Opportunity (EEO) covers many parameters of the workplace.

Fewer people are aware of how regulations promulgated by other agencies can include environmental, social or governance provisions. Many of these require companies to develop and implement compliance programs, and to report externally on these “non-traditional” subject areas.

2.1 Dodd-Frank Conflict Minerals

Background

Section 1502 of Dodd-Frank deals with “conflict minerals”. Stakeholders noted that tin, tantalum, tungsten and gold (“3TG”) are used in computers, cell phones, and an array of products – and that some of these minerals are mined in the Democratic Republic of Congo (DRC) under conditions that constitute substantial human rights abuses. Furthermore, rebels holding sway at the mines contribute to regional instability, and pose a threat to national security. As directed by the statute, the SEC developed a rule to implement the statute. The SEC rule requires companies to identify applicable products, investigate country of origin, and (if necessary) conduct additional due diligence. If companies elect to conclude their products are “DRC Conflict Free”, they must procure an Independent Private Sector Audit (IPSA¹). The rule requires regulated companies to make annual filings to the SEC. The rule also affects many thousands of companies that are not publicly traded, but that are in the supply chain of those that are.



What's New?

Acting SEC Chairman Piowar has requested comments on the SEC Rule, in light of personal observations and stories that the rule has resulted in a de facto embargo of the DRC. Comments are due March 17, 2017.

¹ My firm conducted one of only four (4) IPSAs in the first reporting period, and has conducted an IPSA for each of the first three reporting periods. See www.DFCMAudit.com.



There is a purported draft of an Executive Order that could defer all reporting to SEC for two years. The European Union has passed a conflict minerals rule; there have been reports that the EU could reconsider their rule if the rigor behind the U.S.'s rule is relaxed.

There have been suggestions in some states that they implement laws to replace the SEC rule if it is weakened or withdrawn.

Even if the SEC rule is deferred or repealed, some major consumer-facing brands have already announced their intention to continue sourcing 2TG as conflict free.

2.2 SEC Regulation S-K

Background

Regulation S-K (very simply speaking) is an SEC regulation that (among other things) provides a “roadmap” of how publicly-traded companies should evaluate issues for materiality for purposes of disclosing the company’s perspective on risks, plans to address those risks, and/or the potential impact of future performance of the company. For anyone who has read a 10-K report, it would come as no surprise that Regulation S-K is cumbersome, resulting in the need for disclosures of the same issues in different parts of the filing – among other things.

What’s New?

The SEC published a Concept Release in April 2016, as part of an initiative seeking to reduce the complexity of regulations and simplify reporting. The SEC listed six specific issues for comment. Sustainability as a topic for financial disclosures was one of those six issues. Of the 200+ pages in the Concept Release, Sustainability accounted for a little more than a dozen pages. Of the non-form letters the SEC received, approximately two-thirds concerned Sustainability in financial filings. The overwhelming majority of these letters supported more disclosure in financial filings.





2.3 Modern Day Slavery and Human Trafficking (MDSHT)

Part One: California

Background

California broke ground in 2010 when it enacted the Transparency in Supply Chains Act.

CA-TISCA requires certain companies in California to investigate the possibility of MDSHT in their supply chains. The law empowers the state attorney general to bring actions, and also provides an online mechanism to submit possible violations. The law suggests Tier 1 supplier certifications, and training. The law requires statements posted on the home page of company websites. In a state where the real estate adage “location, location, location” holds especially true, this author notes that there is no more prized location than the home page of a company’s website.

What’s New?

After the postings had been required for some time, an NGO performed research on over 1,000 postings. The NGO, Development International, published a report that included compliance-based criteria, scores and rankings of California companies. On March 8, 2017, Development International released their second annual report, with ~1,900 companies included in their survey set. The study listed a Top 50 that had done an exemplary job. Overall, though, scores were lackluster for compliance, as were on criteria that evaluated a maturity level of disclosures. Company performance scores on the California law are now publicly available.

Part Two: UK

Background

The UK passed the Modern Slavery Act in 2015. The law applies to companies doing any business in the UK, if their revenues exceed a threshold (provided in pounds, but ~\$40 million US) worldwide. The law applies to any sector: manufacturing; professional services; hospitality; etc. The law requires annual submittals, signed by a member of the Board, to a government entity. Submittals follow the fiscal year, beginning with those ending March 31, 2016. UK guidance suggests six topics for inclusion in disclosures. The issues don’t align exactly with those in California’s law.





What's New?

Although the UK law does not include a deadline for submittals, there is a “soft suggestion” of no more than six months after fiscal year-end. The submittals have started to come in, and NGOs are developing tools that allow ready access to companies’ statements. One group has already begun to review, analyze, and rate the disclosures. Of the first 83 statements, only one-fourth met the requirement for the proper signature, and less than one-eighth included anything on each of the six suggested disclosure criteria.



There are at least two B2B information sharing tools in development. These will provide a mechanism for companies to request information from their suppliers. They will also open the floodgate to requests from customers – for similar information on the same issue, but in two different formats.

Already this year, France has passed a law on MDSHT, and other countries have indicated interest.

Part Three: Federal Acquisitions Act

Background

Any company providing goods or services to the U.S. Government is subject to Federal Acquisition Regulations (FAR). Already extensive, FAR continues to be expanded. In January 2015, Combatting Trafficking in Persons was added to the list. It applies to companies providing goods with value in excess of \$500K from outside the U.S. The provision requires a compliance plan, due diligence, certification at outset of contract, annual certifications from subcontractors, and disclosure of offenses.

What's New?

These FAR provisions are becoming more common in contracts, including contracts from prime contractors to subcontractors. Companies must now begin to understand the issue, information sources, and what constitutes reasonable programs, due diligence, escalation procedures, and reporting.



2.4 EU Non-Financial Reporting Directive

Background

The demand for public reporting of non-financial information has grown in Europe, too. EU Directive 2014/95 requires the public reporting of non-financial and diversity information. Goals of the NFR Directive are for companies to identify sustainability risks and increase investor and consumer trust. Topics for disclosure include description of policies, outcomes, risks, due diligence processes. The financial auditor reviews some sections, and checks others to make sure they are included. Member states may require more assurance.



What's New?

Member states were required to transpose the EU Directive into their own directives by December 2016. The directive takes effect for companies for fiscal years ending in 2017. More guidance is expected on disclosures related to climate change. And the EU has already scheduled an effort to review the effectiveness of NFR disclosures for late 2018.



3.0 SELECTED NON-FINANCIAL REPORTING FRAMEWORKS

There are many frameworks for reporting of non-financial information. This section provides a very high-level overview of three. The summary of these frameworks are my perspectives, and do not represent official views of the organizations discussed.

3.1 Global Reporting Initiative

Background

The Global Reporting Initiative (GRI) was established in 1997, with the goal of encouraging voluntary external reporting of environmental, social, economic [beyond financial] and governance (often called “ESG”) issues.

GRI published reporting guidelines – essentially an inventory of all the issues a corporate citizen might want to report. Some reporting parameters were mandatory for organizations wishing to state their reports were “in conformance with” GRI. Other parameters were voluntary.



GRI published revisions of the guidelines as issues gained prominence, stakeholders expressed an interest in information, or as data and information became available. GRI released their fourth major version of guidelines (G4) in 2013. Two major changes in G4 were:

- Materiality: the introduction of “materiality²” as a means for companies to determine which issues warranted reporting, and
- Meaningful narrative: an emphasis on solid reporting of management approach to Sustainability in general, and for topics identified as important.

These changes were designed, at least in part, to counter a growing perception that GRI reports consist more and more of marketing puffery than a demonstration of solid commitment to ESG issues.

GRI reports that over 7,500 organizations worldwide use GRI for their ESG reporting.

What’s New?

GRI released new guidelines in October 2016. The new guidelines are not intended to be a major change, but there are two aspects that could yield dramatic changes in the future of ESG reporting.

² The word “material” is a matter of some contention within the NFR community. It has a specific meaning in U.S. Securities law, and if used otherwise, some attorneys caution that it could create or imply certain legal conclusions. GRI has used the word “material”, but the author uses “significant” in its GRI meaning from this point forward.



Modular: Whereas prior versions of the GRI guidelines had been released all at once, the new approach treats guidance on each topic as a module. If drivers, reporting parameters, or stakeholder expectations change for one topic, the guideline for that topic can be changed. For example, MDSHT is rapidly entering the limelight. Guidance can be refreshed on that quickly and without re-publishing the entire guidance.

How Significance is Determined: If a company reports only the issues it cares about, that's a marketing piece. If a company is to report for the benefit of stakeholders, then it should report on ESG information the stakeholders care about. GRI notes that this has always been their premise, but it is front-and-center in the new guidelines. Determining "significance" is not from the inside out; it is outside-in.

The guidelines keep the emphasis on discussion of management approach. Not only do companies have to engage with stakeholders, they should describe who the stakeholders are/ were; how they were chosen; and summarize the

Sector	Significant: We Decided	Significant: Stakeholders Decided
Banking	Customer relations Cybersecurity	Fees for low-income customers Information privacy Employee language skills
Food	Food safety Diversity in employment	Healthy choices Food country of origin Animal welfare

outcomes of that engagement. The table shows an example of what significant issues might be using the inside-out and the outside-in approach.



3.2 The Sustainability Consortium

Background

The Sustainability Consortium (TSC) was established in 2009, with the mission of transforming consumer goods industry, so the things we purchase at retailers, use – and discard – are more sustainable. TSC currently boasts over 100 members, including Walmart, Kroger, Unilever and Mars.

TSC recognized that sustainability impacts vary with the type of consumer product. They developed over 150 product categories, with approximately eight to ten sustainability parameters for each. TSC considers all social and environmental impacts across the life cycle. TSC took a holistic approach in identifying these parameters, working with NGOs, industry, and respected parties in the scientific



community. TSC collaborates with SAP to support a platform that enables “many-to-many reporting”, reducing the reporting burden on companies in the retail supply chain.

What’s New?

TSC published “Greening Global Supply Chains: 2016 Impact Report” in late 2016. The report notes the need for consistent, reliable information. There are over 450 eco-labels for products, with over 200 attributes for “eco-friendly” food alone! The report evaluated over 1,700 suppliers for where sustainability impact occurred in their supply chain, and how much information was available about it. As TSC rolled out the report, they noted that there were a few companies leading the pack, with most companies far behind.



The two photos are screen shots showing presentation of key data. You don’t even have to read the chart; the color-coding tells the story. There is a long way to go to learn about the sustainability impact of consumer goods, let alone to reduce its impact. TSC has prepared one-page guides that retailers, their analysts, and buyers can use to inquire about sustainability information. Companies anywhere in the supply chain for

retail goods (including packaging and transportation) can expect to see a substantial increase in the expectation for meaningful data and information soon.

This author notes that, although some company-specific information may be obtainable via request from TSC, it will be a routine matter to report this external to the company to customers. “Non-financial reporting” need not be public to be impactful.

3.3 Sustainability Accounting Standards Board (SASB)

Background

The Sustainability Accounting Standards Board (SASB) was created in 2011 – six short years ago – to promote disclosure on sustainability factors in SEC filings for publicly-traded companies. The SASB premise is that existing securities law requires disclosure and discussion of “material” issues [using “material” as defined by the U.S. Supreme Court in the context of investors considering decisions]. Whereas GRI has been a taxonomy to enable a company to report





any issue of concern to any stakeholder group, SASB's singular focus has been on investors, with no new law, regulation, or agency action required.

This author notes that many in industry had noted that sustainability is a “fuzzy issue” and there were really no acceptable, supportable ways to separate material issues from fluff. SASB recognized that the traditional way of categorizing industries contributed to the problem – so they created their own. The SASB's Sustainable Industry Classification System™ categorizes industries according to similar sustainability risks. For example “energy” can include exploration and production, as well as refining. The two present different types of risks for environmental and social issues. However, if exploration and production is classified with mining, it would be easier to establish sustainability risks common to both. Similarly, refining and chemicals manufacturing share sustainability attributes and risks. The inset [provided courtesy SASB] is a handy reference-at-a-glance of which issues are considered material for each industry.

The SASB Materiality Map is a grid showing the materiality of various issues across different industries. The issues listed on the left include: Governance and Ethics, Environmental, Social, Human Capital, Business Model and Innovation, and Leadership and Governance. The industries listed at the top include: Agriculture, Chemicals, Consumer Goods, Energy, Financials, Healthcare, Industrial, Technology, and Transportation. The map uses a color-coded system to indicate the materiality of each issue for each industry.

SASB proceeded to use a rigorous approach to identify material issues, considering regulatory framework, fines and penalties, extent of shareholder proxy filings, and other criteria.

Oh – and lest you dismiss SASB's venture as tech hackers or video gamers with nothing better to do – the Board includes two former SEC chairs, the chair of FASB, a leader of a large state investment fund, and Michael Bloomberg. The primary author of the COSO Enterprise Risk Management framework is now on the SASB board.

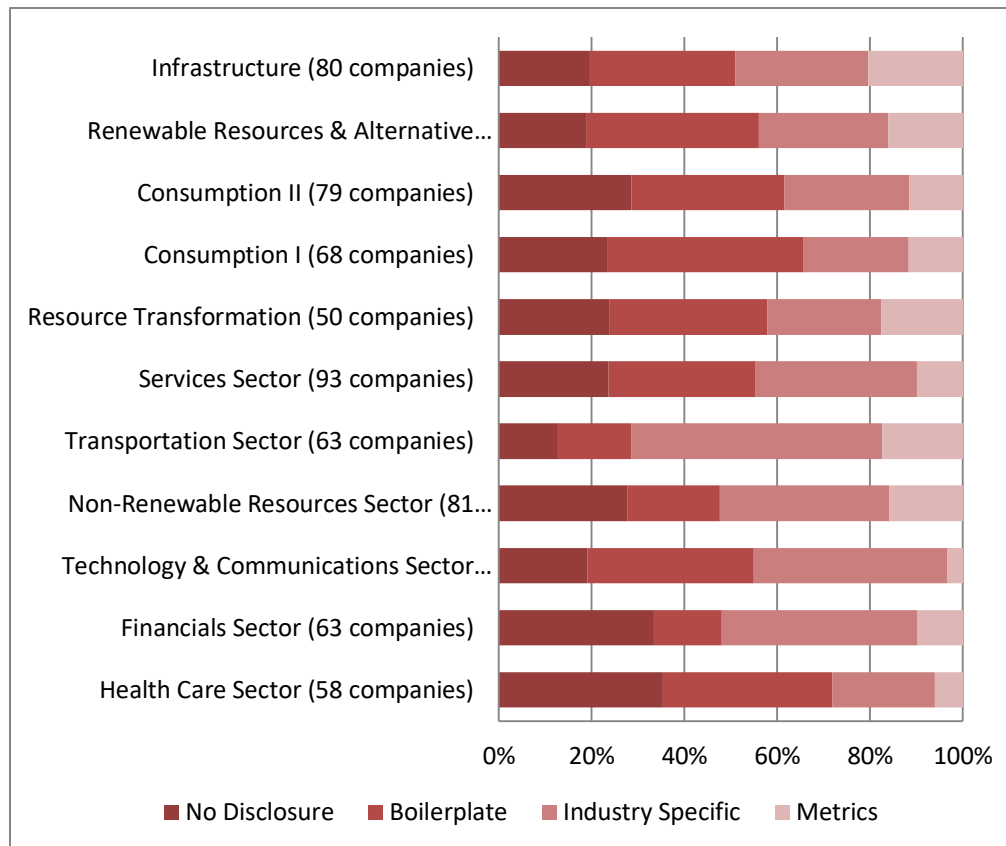
What's New?

SASB completed provisional sustainability accounting standards for the last of 79 industries/ sectors in 2016. These standards are now open for comment, with the plan on migrating these to final standards in about a year.

SASB noticed that almost half of the downloads of their standards were coming from outside the U.S., mostly from Europe. This suggests that stakeholders preparing for the EU NFR directive (either to prepare their reports, or analyze those companies who do) are looking for the high-impact issues to include.



SASB released “State of the Disclosure” report in December 2016, establishing a groundbreaking resource on how thousands of companies are doing with their sustainability accounting disclosures today. The short answer? Not great. The inset (again, courtesy of SASB) shows that, for most



industries, the prevailing approach was to provide boilerplate language, if anything at all.

SASB launched yet another effort in early 2017. The SASB’s Standards Navigator research platform allows subscribers to quickly find sustainability accounting disclosures in any

10-K, see their current rating (boilerplate, industry specific, etc.), and compare the state of these disclosures with other peers.

Consider that six short years ago, investors interested in sustainability disclosures had to determine their own criteria, interpret materiality, search for disclosures – and then hope that there were disclosures at other companies that enabled a semblance of reasonable comparison. This is now available with a few mouse clicks to researchers and analysts – including anyone with a Bloomberg terminal.



4.0 PERSPECTIVES ON NFR RISK

4.1 Risk Assessment Models and Non-Financial Reporting

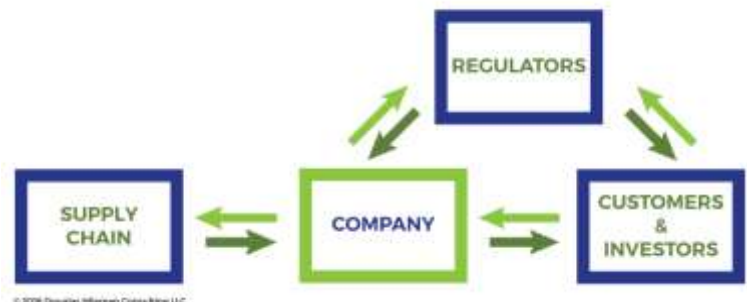
Background

The COSO Enterprise Risk Management (ERM) cube has been a familiar sight for over a decade. Alas, revisions of COSO ERM framework could mean that the cube's days are numbered. This author likes the simplicity of this model. Not to be equated with the simpler cube for internal controls, the model shows four categories of risks, which are easy to relate to:

- 1) Strategic/ Business Strategy
- 2) Operations
- 3) Reporting
- 4) Compliance



Having worked in corporate compliance, and supported many clients in developing programs to address new laws and regulations, I have observed a fairly consistent organizational response to new laws or regulations. Legal determines applicability. Appropriate functional groups identify gaps, and (perhaps other) groups develop and implement programs to comply. There is internal reporting, and review procedures before external reporting (if required). It's a straightforward process, as depicted in the figure.



What's New?

COSO is revising the new ERM framework, with a different graphic. The value proposition is the same.

This author suggests that the revision acknowledges that very nature of risk has changes. Revisiting the four categories of risk from the familiar cube, consider how each one has changed.



- **Compliance** has moved beyond regulatory, with the prevalence of contracts, supply chain / customer agreements, purchase and sale agreements, provisions of insurance policies, etc.
- **Operations** consisting of facilities that are owned and operated in-house are increasingly scarce. In their place are contractors, complex/ deep supply chains, and resources in the gig economy.

Table 1, Categories of Enterprise Compliance & Reporting Risk: Traditional and Current Business Model

Compliance			Reporting	
Laws, Regulations			Financial	
Laws, Regulations	Legal, Contracts	Standards, Codes	Financial	Non-Financial

- **Reporting** includes the default of financial reporting, but more avenues (public and B2B) of non-financial reporting that have become increasingly impactful.
- **Even business strategy** has changed. Technology and social media pose accelerated risks to business strategy, goals, and objectives.

Table 2, Categories of Enterprise Operations and Strategy Risk: Traditional and Current Business Model

Operations			Business Strategy	
In-House			Strategy, Goals	
In-House	Contractors, Gig	Supply Chain	Standard Risks	Accelerated Risks

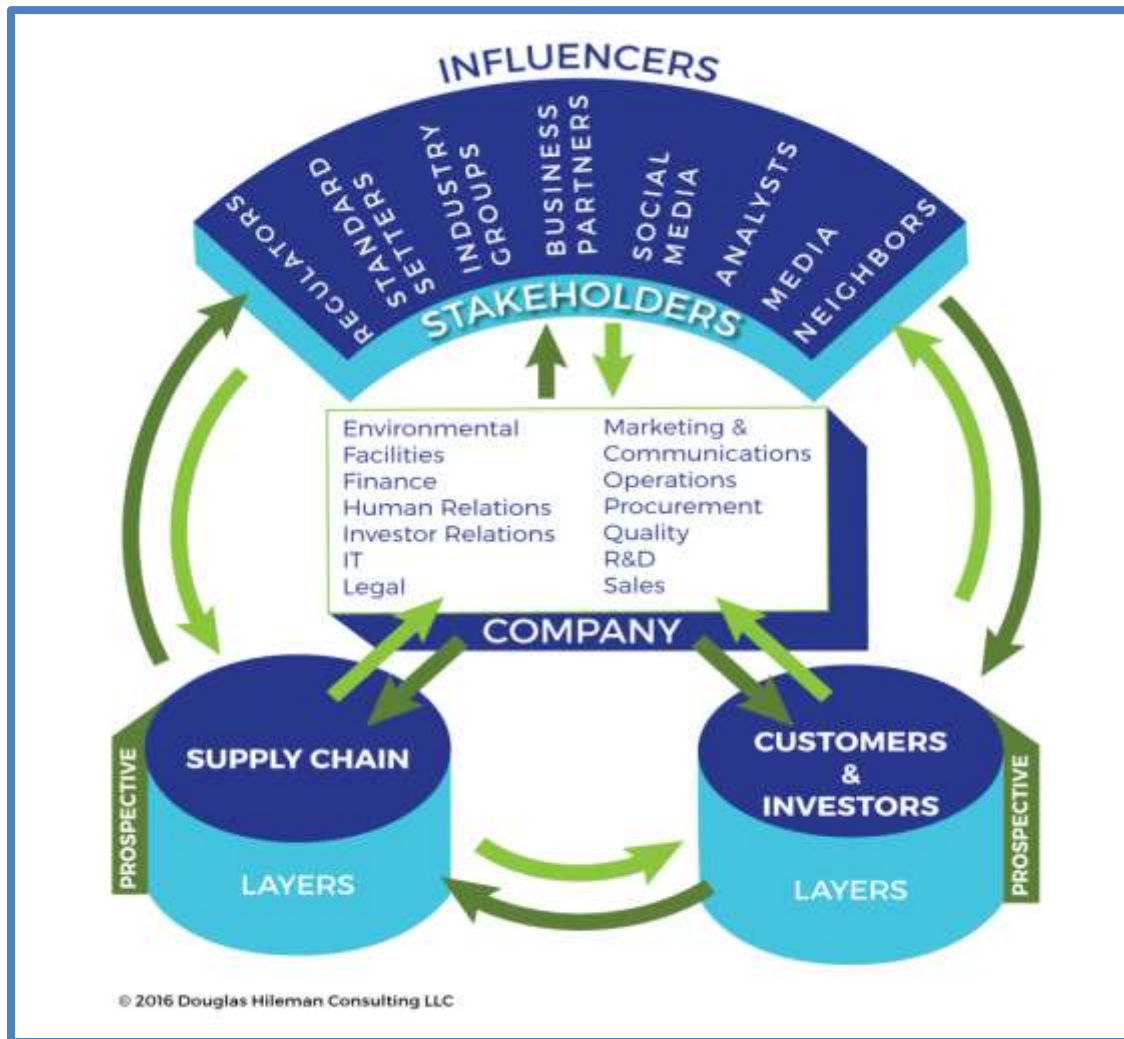
4.2 Risk Assessment Exercises for Non-Financial Reporting

Risk assessment exercises have typically involved identifying inherent risks, scenarios or occurrences, existing controls, and considering residual risks. A team can brainstorm possible additional measures to mitigate risks, evaluate costs and benefits, and make an informed decision on whether to accept the risks or take additional mitigation steps.

In developing a risk matrix for one of the non-financial issues noted elsewhere in this paper, this author identified over 20 risks, such as missing filing deadlines, publishing information via different channels that was (or perceived to be) inconsistent, and potential loss of sales. That was for one rule.



The world of ESG expectations and reporting can be convoluted. Investors can communicate with customers, who communicate with governments and suppliers – and the obligation becomes the company's. The genesis of NFR obligations does not follow the traditional, straightforward approach of beginning with Legal, and wending its way through traditional implementation channels. Instead, the model looks more like the figure below.





5.0 HOW INTERNAL AUDIT CAN PROVIDE VALUE

Risk management involves assessment of risk, consideration of additional practices to mitigate risk, and implementation of additional controls where practical to reduce risks. Anyone can find ways to produce value from NFR, but Internal Audit is in a unique position to do so.

5.1 Internal Audit Mission and Activities

The Institute of Internal Auditors describes Internal Audit's mission as "enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight."

Mission statements from other organizations include familiar words: independent; objective; evaluation; support; efficiency; effectiveness; governance; process; protect; and improve.



Internal Auditors want "a place at the table" – but the place must be earned. If Internal Audit learns about areas of risk that the Board should be aware of – and they are not – then Internal Audit can show leadership by engaging in meaningful discussion to raise awareness, focus on the issue, and advocate for appropriate resources.

Indeed, Internal Audit faces risks if they do not take action. From 2011 to 2016, the percentage of shareholder proposals filed that were related to social and environmental issues has soared from 40% to two-thirds³. If the Board learns of NFR issues and risks first, and asks why they haven't heard about this from you, what is your answer?

5.2 Opportunity: the Flip Side of Risk

The definitions of risk discuss "variations from expected/ target results". Risk management professionals typically focus on the downside – negative developments leading to shortfall, as compared to goals. Opportunity is another aspect of risk, yet it does not get the attention it deserves.

³ Courtesy SASB, from their presentation "SASB 101"



Non-financial reporting is still relatively new. GRI, arguably the predominant framework for non-financial reporting, is twenty years old. Companies have been reporting financial results for centuries, and using generally accepted practices to do so.

As this author notes in this white paper, several landmark studies have been released in/ since 2016 that paint a clear picture of how companies fare in non-financial reporting. The results are increasingly available, and at the fingertips of stakeholders who make impactful decisions. If the general state of NFR is generally low, then what strategic opportunities are available to companies that make it a priority, and treat it as a strategic opportunity?



Potential opportunities abound. They could include inclusion in stock funds, improved customer relations, reduced time and effort meeting customer requirements, more efficient handling of audit requests, reduced insurance premiums, or better attraction and retention of talent. The opportunities may not be obvious. The functional groups that may be able leverage them may not have the resources, tools, or authority to pursue them.

Internal Audit can leverage its mission to help the organization achieve value in many aspects of NFR. It's time for the first step.

5.3 How Does Internal Audit Help?

Internal Audit should recognize non-financial reporting – and the underlying issues – as business issues that pose business risks.

Internal Audit can get a sense of current practice, and what the risks are.

Find out how your organization fares on landmark reports, including the three mentioned in this report. Understand the gaps, their implications, and where you might find more (or better) information about them.



Internal Audit's comfort zone is often with assurance engagements. The criteria are clear and undisputable. Auditors can compile evidence, and form a solid basis for findings and recommendations. Non-financial reporting is not amenable to this. Chapter 2 emphasized many substantial changes that have occurred in just 15 months – and this is a partial list of drivers, laws, contract requirements, and



reporting frameworks. These fast-paced, high-profile issues are well-suited for a consulting engagement.



Specialists with deep knowledge of the risk areas noted above, how they are related and can influence the company can be invaluable. If considering a specialist, ask about experience in risk management, robust reporting (experience in financial reporting can be helpful). Ask their opinion of the typical current state of companies' internal systems and controls; this will provide clues as to whether they know how to find out relevant, useful information. Ask about their traditional working model, and whether it includes co-sourcing and coaching that helps key staff in your organization learn, and improve the programs as they go.



Douglas Hileman, CRMA, CPEA, P.E. has led his firm for over nine years. He draws from over 35 years of experience in operations, compliance, business strategy, enterprise risk management, non-financial reporting, and auditing. He worked at PricewaterhouseCoopers for six years, where he supported financial audits, internal audits, and engagements involving governance, risk management, compliance. He has nine years of experience in industry.

Douglas first wrote a Sustainability report in 2002, drawing from experience in reporting on environmental, safety, and operational practices to senior management and regulators. He has helped develop (and audit) organizational strategies, systems, controls, and effectiveness of Sustainability reporting. Doug has kept pace with the fast-paced field of standards, frameworks, practices, and risks of non-financial reporting. He submitted comments the draft SEC Rule for conflict minerals, as well as for several industry and global frameworks for non-financial reporting. He has over 30 years of experience in various types of auditing, and often works with auditees to help them achieve successful outcomes from critical audits.

Doug often co-sources engagements. Clients find this especially effective for new or emerging areas, or where the organization is developing programs or staff, or dealing with high-profile issues. Services have included non-financial reporting risk assessments; audits of Sustainability reports; developing company programs (conflict minerals, environmental reporting, managing customer audits, periodic supply chain business reviews). He applies standard business practices (risk management, business process flow diagrams) for more efficient and effective programs, and to help clients achieve greater value. Doug was among the very first to consistently consider fraud in audits of operations, compliance, and non-financial reporting.

Doug is a prolific writer of thought leadership, and is often a featured speaker at conferences and professional association meetings. As a member of a global committee of the Institute of Internal Auditors, he co-authored "Internal Audit and the Second Line of Defense."

See www.douglashileman.com for more resources, upcoming events, and to learn how Douglas Hileman can help your organization.

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