



NAVEX Customer Success Story

Scaling Compliance: Pilot's Journey to Integrated Risk & Compliance Management

"We use NAVEX One to find our risk and compliance hotspots and track our metrics all the way down to each division, region and store. I don't know that we could do what we do as effectively as we do it without NAVEX One. We were creating reports from scratch – but NAVEX takes care of at least 80% of it all."

Michael Sayne

Deputy General Counsel, Corporate Compliance



Highlights



Industry

Retail, energy and logistics



Employees

30,000+



Challenge

Pilot needed a strong risk and compliance program to support its fast growth while meeting the high standards of its parent company and improving risk and compliance data insights.



Outcome

Pilot maintains a data-driven compliance program that exceeds many NAVEX benchmarks and maintains high team member engagement, proactive risk management and a commitment to continuous improvement.

Solutions

NAVEX One®

- Whistleblowing & Incident Management
- Ethics & Compliance Training
- Third-Party Screening & Monitoring

About Pilot Company

Pilot is a leading brand in the retail, energy and logistics sectors. It operates in nearly 900 locations across North America, catering to travelers in 44 U.S. states and five Canadian provinces. As a leading fuel supplier, Pilot distributes more than 12 billion gallons of fuel, diesel exhaust fluid (DEF), biodiesel and other renewable energy sources annually.

Challenge

Pilot's rapid growth presented several challenges to maintaining a consistent and effective risk and compliance program. By 2013, it became clear that its efforts to assess risks, provide team member training and create effective policies were struggling to keep pace with new requirements due to resource limitations and patchy risk and compliance awareness.

Pilot's existing reporting methods were underutilized, with the previous "Alertline" rarely being called. Investigations were often handled by operational leadership whose primary focus wasn't case management. Pilot recognized this could lead to inconsistency, risking potential conflicts of interest and slowly eroding team member trust in the hotline system.

In terms of dedicated resources, Pilot had operated without an established compliance department throughout its then 55-year existence. This resource constraint meant that even when whistleblowing and case management software was initially introduced, opaque procedures and policies in the wider compliance program meant case managers and reporters alike were never completely confident in navigating or using the system effectively.

While Pilot continuously worked to implement and mature its compliance program, its acquisition by Berkshire Hathaway meant the organization would need to reevaluate and evolve how it approached risk and compliance. Pilot needed to ensure its risk and compliance program met the highest ethical standards to protect both its reputation and that of its new parent company.

Outcome

To build a culture of compliance, Pilot invested in both internal resources and external solutions – including NAVEX One – to support its goals. A dedicated Ethics and Compliance Office was established and is currently led by the Deputy General Counsel of Corporate Compliance. Pilot rebranded the reporting hotline as the "PFJ Listens Integrity Line" and publicized its purpose throughout the organization via updated posters and publication of access by simply scanning a QR code. In 2021, the office created the Employee Relations Services (ERS) team to manage investigations, identify areas for improvement, and review every background check, ensuring greater consistency and compliance with EEOC guidelines. The compliance team has expanded and now includes dedicated team members across North America.

Following the acquisition, Pilot transitioned to Berkshire Hathaway's NAVEX One Whistleblowing and Incident Management platform in 2023. It then invested in promoting the new system to boost awareness, updating posters in all facilities and providing decals in all commercial vehicles.

To improve its team member training program, Pilot invested in an enterprise license for NAVEX One Ethics and Compliance Training. To date, it has distributed over 30 courses and 100,000 individual e-modules, customizing content with Pilot's own branding and policies and translating them into multiple languages.



Whistleblowing & Incident Management

Build, measure, and grow your speak-up program to foster trust, shared responsibility, and the highest standards of ethical conduct with NAVEX's industry leading whistleblowing and incident management software.



Ethics & Compliance Training

Strengthen organizational culture, meet legal requirements and inspire behavior change by deploying online ethics and compliance training. Our robust library of courses set the industry standard for quality.



Third-Party Screening & Monitoring

Easily identify third parties that share your vision and safeguard your most valuable partnerships with NAVEX's third-party screening and monitoring software, which enables you to adopt a risk-based approach to third-party due diligence.

"I thought at first that I wouldn't have a clue how to add custom content or would certainly struggle, but it's remarkably easy. That's one of the best things about the tool NAVEX has created. In just a few minutes I can add Pilot's logo, add our preferred acknowledgment language, attach our policy and even insert a custom intro to the training," said Michael Sayne, Deputy General Counsel, Corporate Compliance.

Some of the key training modules used by Pilot include code of conduct content, conflicts of interest and state-specific anti-harassment behaviors and reporting expectations, all deployed through Pilot's internal LMS. Pilot has also adopted a two-pronged approach of proactive yearly training on core topics. These include the creation of an annual risk and compliance training plan for all team members, plus reactive training used to address specific issues as they arise in specific locations or departments.

To strengthen third-party due diligence, Pilot implemented further NAVEX One software, integrating it with the accounts payable and human resource systems via API to automate screening and KYC efforts.

"Before NAVEX, we'd run all this data in a report and get a ton of false positives, hundreds of them that all needed to be reviewed one at a time. NAVEX One Third-Party Screening and Monitoring does that initial review based upon risk-based parameters, significantly decreasing the time required to complete reviews but also giving me peace of mind that our process is far more thorough and timelier," said Sayne.

The organization also added supplementary KYC processes to enhance trade-related due diligence, including a resource that allows compliance representatives to monitor trader communications for concerning content. During 2023-2024, Pilot also adopted a new vendor code of conduct that every third party must agree to abide by, extending the reach of risk and compliance program efforts beyond its internal workforce.

Results

Pilot's dedication to building and scaling its risk and compliance program has delivered impressive results. In 2022 and 2023, it achieved over 99% team member completion rates for its risk and compliance training courses. In 2024, it exceeded its even greater target of 99.6% completion despite launching over 20,000 compliance training modules. Using NAVEX One, Pilot has also experienced no backlog in third-party risk screening process, successfully vetting over 70,000 third parties each year.

"The NAVEX One platform has saved hours of time while ensuring less risk and greater compliance with the law," Sayne said.

Pilot's improved incident management process is also much more effective. With an average report volume of 15.9 cases per 100 team members in the last 12 months, the ERS team maintains an average case closure time of approximately 11 days. Meanwhile, Pilot's anonymous reporting rate is significantly lower than the NAVEX benchmark (31% over the last year and reaching a low of 25% in May 2024), indicating high team member trust and confidence. Pilot's ERS team is now able to drive continuous improvement using data from NAVEX One Whistleblowing and Incident Management software, creating a monthly dashboard for operations where trends and areas of relevance are highlighted.

“The ERS Team uses case data to conduct monthly retrospectives of investigations to ensure that the team is always improving,” said Sayne.

They also use NAVEX One analytics to benchmark performance, set goals and identify locations or issues needing focused attention, conducting monthly reviews of investigations and pivoting training and awareness around findings. More broadly, Pilot has also revamped the company’s corrective action and cash handling policies in response to new data insights.

“We track everything we can possibly track. We set metric goals and use data to set the performance goals for the ERS team,” he said.

Pilot’s compliance team has developed methodologies for graphically reporting the annual performance of compliance, including metrics that reflect ethical conduct and loop in company culture – the intent being to prove the value of this often-qualitative metric to its leadership team. These reports, similar to the company’s existing KPI reports, use a color-coded system for quick assessment against benchmarks and internal goals.

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Looking ahead, Pilot is focused on using data from NAVEX One Whistleblowing and Incident Management to develop more granular reporting, such as detailed substantiation rates and anonymous or identified reports by issue type. To further enhance its compliance infrastructure, Pilot recently implemented a new trade compliance system with hopes to incorporate AI. For its training program, Pilot is incorporating surveys for its team members and leaders to gather their opinions related to the quality and relevance of the training assigned and is also developing an end-of-year compliance training assessment to test knowledge retention, aiming to pinpoint priority areas in greater detail in the future. Perhaps most importantly, in 2025, Pilot is working on a year-long project to assess and ultimately improve the maturity of its compliance program, going so far as to implement a KPI goal related to its maturity score that will impact short-term incentive payments. Pilot is bringing awareness across the organization on the importance of compliance and that every team member is responsible for creating a culture of compliance.

To learn more about what NAVEX offers or to schedule a demo, please visit www.navex.com or call us at U.S. +1 866 297 0224 or EMEA +44 (0) 20 8939 1650.

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