

## **Adriana Dulic** CHIEF COMPLIANCE OFFICER **EPOCH PAYMENT SOLUTIONS**

### MORE ABOUT ME

#### If you could tell your past self one thing, what would it be?

It would be not to worry so much and trust that everything is going to work out. I come from a country that no longer exists and looking back, there were so many unknowns and obstacles that made it very unlikely that I would ever get to live the life that I get to live today. But if you work hard and do the right thing day in and day out even when nobody's watching, things do tend to work out for the best.

#### The interview for your dream job ends with a solo karaoke performance – which song would you perform?

It would have to be "The Best" by Tina Turner.

#### What is your biggest ever extravagance?

Hands down my biggest extravagance so far had been racing in a multi-stage race in Antarctica a little over a year ago but it was well worth it to be walking among the penguins in the footsteps of Ernest Shackleton.



# **Asked & Answered** THE SECRET SAUCE OF COMPLIANCE

#### What is your secret sauce for compliance?

I think it's all too easy to miss the forest for the trees so to speak or rather get lost in minutiae of a never-ending barrage of new regulations and compliance mandates. So I would say that my secret sauce of compliance is to be clear-headed about who, why and how we do things that we do.

In other words be clear about all of the stakeholders (company's board of directors, management, customers/clients, internal staff members including sales, regulators, auditors and community as a whole including consumers) and the fact that the interests of all of those stakeholders may be different and in some ways conflicting and then find the way to balance it all and to make everyone satisfied which is extremely challenging to do.

#### What new subject matter expertise are you working on to stay at the cutting edge of your practice?

At the moment, it is all about artificial intelligence which is on everyone's minds these days both in terms of how to make best use of it as well as how to make sure it is being used in a compliant manner given the fact that it is all so new and most of the countries around the world are still grappling with what to do with it and how to regulate it. There is also an added wrinkle in it in having to also figure out how to best protect your company from bad actors exploiting the use of artificial intelligence to beat any of your company's due diligence efforts and requirements.

#### What is the ideal relationship between Compliance and Legal teams?

As an attorney and as someone that's been involved in both legal and compliance, I must say that I have always found these types of questions to be perplexing especially because my experience has almost exclusively been with a company where many of us simultaneously wear many hats out of sheer necessity because things have to get done and there are only so many of us around to get them all done.

#### If you weren't a compliance professional, what would you be and why?

I'm pretty much the biggest fan of National Geographic and would probably be doing pretty much anything at, for or with National Geographic.

#### Is Artificial Intelligence a pro or a con to the compliance profession and why?

I suppose it is yet to be determined. In many ways, it (at least) holds a promise of being very beneficial to the compliance profession in that it automates routine tasks, makes us more efficient and (hopefully) leads to better decision-making since its sheer computational power allows for a lot more variables to be taken into account than any human ever could which should lead to better detection of any risk, anomalies and truly suspicious behavior.

On the other hand, there's a potential danger in relying too heavily on this technology that's often very opaque, complex and very difficult to understand as to how it comes up with its decisions or recommendations. And then there's obviously an ongoing debate of its potentially negative impact on workforce in general (not just in compliance profession).

There's actually a book I can recommend on this topic which explores both sides of the coin "A World Without Work – Technology, Automation and How We Should Respond" written by Daniel Susskind.

#### What are your predictions for the future of compliance in your industry?

Add to that the fact that in most organizations (especially those outside of heavily regulated industries), most general counsels hold a title of a chief compliance officer as well. In other words, it has been my experience that the line between legal and compliance is often blurry, if not non-existent.

For a society to function properly, rules of the road (so to speak) have to exist and there will always be a need to figure out how to best comply with them as well as monitor for continued compliance. The good news is that for the foreseeable future nothing can beat the ingenuity of a human being in accomplishing those tasks. The bad news is that as the world continues to shrink and technology continues to evolve, it is becoming increasingly challenging to do so.

## THE RESULTS

We asked.....

To what extent should compliance and ethics programs have oversight of employee off-channel communications? (e.g. social media)

<b>Ongoing ac</b> tive surveillance
Clear policy, no surveillance
Reactive, only when flagrant
Reactive, only when flagrant

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## JANUARY 2024