MANAGING THIRD PARTY COMPLIANCE PROGRAMS ON A GLOBAL SCALE

Allan Matheson, CEO
Blue Umbrella

COMMON CHALLENGES?

Program design & implementation
Risk-based approach
Cultural nuances
Systems
Regulatory
Diligence

A TYPICAL WORKFLOW

Business Case Justification submitted & approved
Questionnaire & Code of Conduct
Review information, risk rate
Contract
Application & approval
Due diligence process
Training
Monitoring
Review, recertification, renewal
3. CULTURAL NUANCES
### SCOPE – MEDIA CHECKS

<table>
<thead>
<tr>
<th>Media Example</th>
<th>Search Type</th>
<th>Results</th>
</tr>
</thead>
<tbody>
<tr>
<td>Y-Fund Management</td>
<td>State Ownership</td>
<td>Y-Fund Management is 20% owned by DID Investment Company, a state-owned enterprise under the Economic and Information Technology Committee. Retrieved Feb 7 2018: DLYFund, Dalian Economic and Information Commission (SME Bureau)</td>
</tr>
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<td>Alleged transfer of benefits</td>
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<td>The China Securities Regulatory Commission therefore demanded XW Pharmaceutical Co., Ltd. to disclose the transactions between IPGMA Co., Ltd. and XW Pharmaceutical Co., Ltd.’s clients and suppliers in detail, including the transaction background, the amounts, and the balance involved.</td>
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SCOPE – MEDIA CHECKS

Embarrassment by former senior managers of a firm in a David and Goliath battle.

SCOPE – LITIGATION

CONCLUSION
QUESTIONS?

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