COLLABORATION

Can’t We Just All Get Along?
Kristy Grant-Hart

- CEO, Spark Compliance Consulting
- Author, Speaker, and former Chief Compliance Officer
- Published expert on ISO 37001 and anti-bribery / slavery
- Former attorney, Gibson, Dunn & Crutcher, Los Angeles and London

“An accomplished compliance professional and true expert in her field.” – Risk Universe Magazine

Angelika Flamm

- Group Compliance Director, Royal Mail Group
- Winner, Compliance Team of the Year, Women in Compliance Awards
- Former attorney at Gibson, Dunn & Crutcher, London
Defining the Risks

Do you really want to eat the whole elephant?

Defining the Risks

- Bribery
- Competition / Antitrust
- Data Privacy
- Cyber risk / identity theft
- Trade sanctions / import / export
- Health and safety
- Culture and ethics
- Modern Slavery / Trafficking
- Others?

- Bullying
- Labor and employment
- Government / permits
- Travel / kidnapping
- Terrorism
- Money laundering
- Products liability
- Supply chain management
- Others?
<table>
<thead>
<tr>
<th>Risk</th>
<th>Current Owner</th>
<th>Explicit Assignment</th>
<th>Needs and Next Steps</th>
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</thead>
<tbody>
<tr>
<td>Bribery</td>
<td>Compliance</td>
<td>Yes – in the job description and in our anti-bribery policy</td>
<td>None</td>
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<tr>
<td>Competition / Antitrust</td>
<td>Compliance for internal investigations, Legal for regulatory investigations or formal proceedings</td>
<td>Yes- separation of duties is explicitly agreed-to and implemented by Legal and Compliance</td>
<td>None</td>
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<tr>
<td>Data Privacy</td>
<td>Unclear – some compliance, some Information Security and some Information Technology</td>
<td>No- our online privacy policy was written by Legal, but no one is in charge of handling data breach or dealing with regulatory changes</td>
<td>Create a rapid response team for data breach preparation including representatives from Legal, Compliance, Communications, Information Technology and Information Security.</td>
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**COLLABORATION:**
Four Key Functions
Human Resources

• Employee Disclosure Committee for WB cases
• Owners of RMG Code of Business Conduct
  • Disadvantages and work arounds
  • Code attestations and ethics pledges for line managers
    “I will lead by example by encouraging my team to speak up whenever they encounter a breach of our Code!”
• Employee survey
• Ethics & Compliance survey
Internal Audit

- Using audits as an assurance tool
  - Feedback on effectiveness of compliance programme
  - Assessing
- Risk Management
  - Part of Internal Audit team
  - How to define Boundaries?
- Protecting legal privilege
  - Supporting Audit with annual audit plan
  - RMG Privilege Protocol
    - Audit/Legal/Compliance – tri-partite cooperation

Internal Audit

PRE-AUDIT

Post-Audit
Catch-Up

Audit-Specific
Training

Add Compliance
Elements
Legal

• Part of Group Legal
  • From standalone function to CCO reporting to GC
  • CEO transition
• Legal v Compliance
  • A lawyer in Compliance working with Legal
    • Who does what?
  • Stress-testing legal assessments
  • Protecting legal privilege
  • Chose the best skills for each job
Procurement

• Arbiter of key controls:
  • Third Party Due Diligence
    • Trade sanctions and other compliance risks
  • Contract clauses
  • Audits/self-assessments
  • Contract Management liaison with business

• Risk Owners:
  • Accountability
  • Resourcing and budget
Questions and Answers
Thank You! Keep In Touch!

<table>
<thead>
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