

COLLABORATION

Can't We Just All Get Along?



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- "An accomplished compliance professional and true expert in her field." - Risk Universe Magazine*

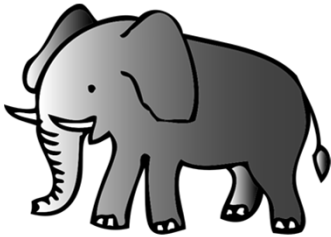


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- Group Compliance Director, Royal Mail Group
- Winner, Compliance Team of the Year, Women in Compliance Awards
- Former attorney at Gibson, Dunn & Crutcher, London



Defining the Risks



Do you really want to eat the whole elephant?

Defining the Risks


- | | |
|-------------------------------------|---------------------------|
| • Bribery | • Bullying |
| • Competition / Antitrust | • Labor and employment |
| • Data Privacy | • Government / permits |
| • Cyber risk / identity theft | • Travel / kidnapping |
| • Trade sanctions / import / export | • Terrorism |
| • Health and safety | • Money laundering |
| • Culture and ethics | • Products liability |
| • Modern Slavery / Trafficking | • Supply chain management |
| • Others? | • Others? |

Wildly Strategic Compliance Officer Risk Ownership Chart – Media Mogul Company Ltd.			
Risk	Current Owner	Explicit Assignment	Needs and Next Steps
Bribery	Compliance	Yes – in the job description and in our anti-bribery policy	None
Competition / Antitrust	Compliance for internal investigations, Legal for regulatory investigations or formal proceedings	Yes- separation of duties is explicitly agreed-to and implemented by Legal and Compliance	None
Data Privacy	Unclear – some compliance, some Information Security and some Information Technology	No- our online privacy policy was written by Legal, but no one is in charge of handling data breach or dealing with regulatory changes	Create a rapid response team for data breach preparation including representatives from Legal, Compliance, Communications, Information Technology and Information Security.

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



Human Resources



Internal Investigations: Roles



EXIT
Exit Interview Data




Separate Your Issues



Whistle-Blower: Final Reports


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



Legal

Separate Your Roles



Can I Help You?



If You're a Lawyer...



If You're NOT a Lawyer...



Procurement

- Arbitrator 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



Procurement

Be Sure They Know the Red Flags fo Modern Slavery



Know Price Sharing / Competition Rules



Create a Conflict of Interest Process



One Due Diligence Process to Rule Them All



Questions and Answers

Thank You! Keep In Touch!

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