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?
### Wildly Strategic Compliance Officer Risk Ownership Chart – Media Mogul Company Ltd.

<table>
<thead>
<tr>
<th>Risk</th>
<th>Current Owner</th>
<th>Explicit Assignment</th>
<th>Needs and Next Steps</th>
</tr>
</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>
</tr>
<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>
</tr>
<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>
</tr>
</tbody>
</table>

### COLLABORATION:
**Four Key Functions**

- 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 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
Legal

• Part of Group Legal
  • From standalone function to CCO reporting to GC
  • CED 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
<table>
<thead>
<tr>
<th>Kristy Grant-Hart</th>
<th>Angelika Flamm</th>
</tr>
</thead>
<tbody>
<tr>
<td>London Office: +44 (0)203 514</td>
<td><a href="mailto:Angelika.flamm@royalmail.com">Angelika.flamm@royalmail.com</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:dianatrevley@SparkCompliance.com">dianatrevley@SparkCompliance.com</a></td>
</tr>
<tr>
<td></td>
<td>Los Angeles Office: +310-299-</td>
</tr>
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<td></td>
<td><a href="http://www.SparkCompliance.com">www.SparkCompliance.com</a></td>
</tr>
<tr>
<td></td>
<td><a href="mailto:kristygh@SparkCompliance.com">kristygh@SparkCompliance.com</a></td>
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Thank You! Keep In Touch!