Practical Strategies for Conducting Effective and Ethical Anti-Corruption Risk Assessments in High Risk Jurisdictions

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Q & A with Industry Leaders

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• Jonathan Drimmer, Partner, Paul Hastings LLP, and former Deputy General Counsel and Chief Compliance Officer, Barrick Gold Corporation
• John Vanderbeek, Vice-President Compliance, Kinross Gold Corporation
• Kristine Robidoux, Senior Compliance and Regulatory Counsel, Gran Tierra Energy Inc.
Risk Assessments Introduction

Can you describe your company's (or former company's) approach to risk assessments?

Risk Assessments Introduction

What are some of the biggest challenges you face when conducting risk assessments and how do you overcome those challenges?
Risk Assessments Introduction

Why do you engage external counsel to conduct a risk assessment
What are your general practices for engaging external counsel?

Securing buy-in from the Company

What strategies do you have to secure buy-in from the top?
What do you do if you encounter business executives who don't necessarily understand the importance of risk assessments, or why they are necessary?
Securing buy-in from the Company

Do you have tips for achieving buy-in from lower level personnel, who are often the ones on the front lines and in the roles that carry the most risk?

Securing buy-in from the Company

Have you experienced any particular cultural issues with getting buy-in from overseas employees? What strategies have you used to address these challenges?
Conducting Risk Assessments

What are some of your recommended best practices for approaching interviews?

Conducting Risk Assessments

What strategies do you have for dealing with personnel who you suspect are not being fully candid because of their lack of familiarity with you?
Conducting Risk Assessments

Do acute issues arise during risk assessments that require attention prior to the reporting stage? Can you provide some examples, as well as how they were addressed?

Conducting Risk Assessments

After the risk assessment has been completed, what are some of the biggest challenges you have faced with implementing the findings?
Conducting Risk Assessments

How often should a risk assessment be completed and when are some key times to conduct one?

Whistleblowing and Risk Assessments

When conducting a risk assessment, what do you look for in a whistleblower program?
Whistleblowing and Risk Assessments

How has the rise in whistleblowing affected risk assessments and how they are carried out?

Dealing with the Authorities

When dealing with the authorities in your jurisdiction (DOJ or RCMP), what are the top questions they have about risk assessments?
Dealing with the Authorities

When the DOJ or RCMP are assessing the strength of a compliance program, how do they view risk assessments?

Conclusion

Any other advice?
Conclusion

Questions?