COMPLIANCE APPLICATION:
Why, When & How
SCCE Dubai

January 17, 2019

Why?
WHY AN ETHICS & COMPLIANCE APPLICATION...

Millennials
- The number of hours we spend on our mobile phones
- Everything is being digitized. Everything is an Application
- It's a way to reach millennials and to evolve as a function

Policy Summaries
- Requires you to condense your Code of Conduct into its palpable points
- Contains policy briefs on relevant ethics & compliance policies
- Make your points and references digestible—“bite size”

Ease of Accessibility
- Forms at your fingertips
- Allows ethics & compliance disclosure forms to be submitted via mobile device
- Upload relevant pictures to disclosure forms
- Contains key contact details

Push Notifications
- Allows the Ethics & Compliance Office to push notifications to a wider audience
- FAQ section addresses common questions related to policies and disclosures
- Flow charts to deal with commonly encountered issues

When?
WHEN YOUR PROGRAM IS SOPHISTICATED ENOUGH ... 

- Code of conduct is launched (internally and externally)
- Policy structure is in place
- Policies have been launched and trained
- Forms are ready & socialized
- Staff to respond & address queries

OUR JOURNEY

- **2011**: Code of Conduct Launch (internal)  
  - CEO Annual Message
  - ARC/CRB Reporting
  - Regular CCC Meetings Held w/ CCC Reps

- **2012**: Helpline Established  
  - 1st Annual Conference
  - Program KPI Reporting
  - Increased Face to Face Trainings

- **2013**: Policies: Gifts & Entertainment Communications
  - Helpline Survey
  - CCC Rep Survey

- **2014**: Policies: Market Conduct & Restricted Trading Social Media
  - Newsletter & NewsFlash

- **2015**: Policies: Insider Trading Patient Gifting
  - 1st Annual Governance & Compliance Survey

- **2016**: Policy Revisions: G&E Helpline

- **2016**: Policies: Competition Law Information Management
  - Code of Conduct Launch (external)
  - DOA Procurement Fraud Control
  - Helpline Survey CCC Rep Survey
  - Export Control MP SEA ITP Claims Donations Conflict of Interest Information Security Acceptable IT Usage
## HOW: LESSONS LEARNED

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<td>Have a Launch Plan</td>
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<td>Determine How To Maximize Application Downloads</td>
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<td>Make the Content Engaging</td>
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<td>Reassure Everyone that It Is Not a Surveillance Application</td>
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<td>Continue to Update Application</td>
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<td>Push Notifications, Quizzes, Etc. Are Key</td>
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HOW: THE LOGISTICS

**HIRE A DEVELOPER**
If there is no in house expertise, hire someone who specializes in developing applications that are content heavy.
Work with the developer to have a clean, structured layout.

**CUSTOMIZE CONTENT**
Develop unique content. Whether it's a newsletter or quiz or push notification, have content that is not available elsewhere and tailored to the application.

**EMBED WORKFLOWS**
FAQ are not enough. Embed workflows that anticipate your employees’ questions and give them the answers.
Do this for all major topics including Conflicts of Interest and Gift & Entertainment.
(See Examples)

USE OF CONFIDENTIAL INFORMATION AND MUBADALA GROUP RESOURCES

**FACTS**
Hamdan, an employee at the Mubadala Group, is sharing policies and procedures with a new government entity. He is also assisting them on the weekends and using his expertise to guide them through the policy implementation process.

**IS THERE A CONFLICT?**
Yes, there is a conflict because Hamdan is sharing confidential information which belongs to the Mubadala Group for which he has not sought permission to share.

**WHAT SHOULD HAMDAN DO?**
- Hamdan should not disclose, use, or share any Mubadala Group confidential information outside of his role with Mubadala.
- Hamdan should confirm the information he intends on sharing is reviewed and approved by the Ethics & Compliance Office prior to it being shared.
- Hamdan should abide by the Information Management policy.
- Hamdan should attend the Information Management training conducted by the Ethics & Compliance Office.
- Hamdan should submit a Conflict of Interest disclosure for review so the potential conflict can be properly managed.
## GIFTS, ENTERTAINMENT, SPONSORSHIPS, AND HONORARIA

### FACTS
Mona, a Mubadala Group employee, organized a meeting with a potential supplier. The CEO of the potential supplier gave a Montblanc pen to Mona in front of a number of people from both companies as a thank you for her contribution in arranging the meeting.

### IS THERE A CONFLICT?
Yes, this could be a conflict as this could be perceived as a bribe to influence business discussions with the Mubadala Group.

### WHAT SHOULD MONA DO?
- Mona should respectfully decline the Montblanc pen from the potential supplier.
- Mona should disclose this interaction with her business leader.

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Thank you