“the future is meaningful and mutually beneficial co-operation. Notwithstanding the current political turmoil caused by Brexit, criminal justice and law enforcement remains high on the agenda for the UK. In this increasingly ‘shrinking’ and technologically sophisticated world, we believe further cooperation and interest from multiple authorities is inevitable for a company that uncovers cross-border crime issues. An equally sophisticated and coordinated response is required by the company and its legal teams. ~ Lisa Osofsky
What we will cover today?

**INCIDENT**

**PLAN**

**INVESTIGATE**

**REPORT**

**REMEDiate**

- Assess and evaluate known facts
- Plan scenarios
- Decide investigative steps
- Set responsibility and scope
- Communicate
Scoping & executing the data collection

- Sources of data
- People
- Forensic collection
- Triage information collected

Collecting relevant materials

<table>
<thead>
<tr>
<th>Data Sources</th>
<th>Data Types</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electronic Data</td>
<td>Structured Data</td>
</tr>
<tr>
<td>Paper Documents</td>
<td>Semi-Structured Data</td>
</tr>
<tr>
<td></td>
<td>Unstructured Data</td>
</tr>
</tbody>
</table>
IT Forensics Challenges

What are the challenges that you might face?

Technology Assisted Review & Machine Learning

- Skilled reviewers train the system
- Hone the population of responsive and non-responsive documents
- Massive reduction in documents to review
- Regulators approve
- Language recognition
Report and RemEDIATE

REGULATOR CONSIDERATIONS

MULTI-JURISDICTIONAL CONSIDERATIONS

Following through with remedial measures

- Risk mitigation, procedural and substantive policies, procedures and action plans
- Socialisation, training and record keeping on policies and personal liability
- Local focus – language, local risks and appropriate thresholds

Culture & Tone

- Tone from where?
- Compliance status and reporting

Importance of ‘getting ahead of the curve’

- Internal threats
- External risk assessment: market, country, competitor, political, product and sector risks
- Listen to customers, investors, regulators, employees, wider market
- Proactive analytics - If you have data, you have to use it
- Periodic review and gap analysis
Closing an investigation

- Reporting strategy and style
- Fines and reparation
- DPA/ monitorship/ declination
- Restoring reputation
- Culture of compliance
- Proactive review
- Market exit

Avoid the same issue from repeating and avoid any situation from turning into a crisis!