A Unique Journey to Compliance
Solutions for Small and Medium-Sized Companies

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Control Risks

Agenda

- Compliance challenges facing today’s businesses
- Case study – ‘We need a compliance system…’
- Resilience strategies and risk mitigation solutions
Compliance challenges facing today’s businesses

**Internal**
- Finding the necessary people
- Integrating compliance into governance structures
- Changing mind-sets and time-honoured habits
- Funding

**External**
- Corruption
- Sanctions and export controls violations
- Anti-trust
- Fraud
- Data theft and cyber-extortion
Case study – ‘We need a compliance system…’

The starting point
- A medium-sized business in Europe
- Operations in Europe, the Americas and Asia
- No formal compliance structures
- Some policies and procedures in place
- Low awareness of implications of extra-territorial anti-corruption legislation
- Need for compliance recognised by board and shareholders
Case study – Building blocks for a compliance system

The journey to a ‘good practice’ compliance system

- Setting the foundations
  - Determining the organisational self-image
  - Defining roles and competencies
  - Identifying and assessing the right risks
  - Building the structure
  - Designing the rules and guidance
  - Putting communications channels in place
  - Preparing the roll-out
- Putting on the roof and landscaping the gardens
  - Getting the message across
  - Training
  - Roll-out review

Case study – Getting the foundations right

Answering the important questions

- What kind of a company are we?
  - Doing as you’re told or thinking for yourself

- What is the remit of compliance?
  - Just because it comes with a fine does not mean it’s a compliance problem

- What are the compliance risks?
  - Find and assess
Case study – Safety nets are stronger than walls

Designing the compliance system
- Policies and procedures
  - More guidance and fewer prohibitions

Communications channels
- Who to ask for advice?
- How to report concerns?

Preparing the roll-out
- Who does what?
- Designing the training programme
- Making sure of delivery
- Getting and acting on feedback

Case study – Bringing compliance to life

Getting the message across
- Communicating the new system
  - Tone from the top
  - Using multiple channels
  - Don’t forget customer and suppliers…

Training
- Terrific training turns theory into practice

Review and feedback
- Making sure the message has spread
- Starting the continuous improvement process
Case study – ‘Yes, but…’

Some comments on common concerns

- ‘It will cost too much’
- ‘It will stop us doing business’
- ‘It is impossible to implement’

Resilience strategies and risk mitigation solutions
Resilience strategies and risk mitigation solutions

Ensuring that the system lives and functions
- Keep working on the ‘compliance culture’
  - Work ethic trumps paper policies
- Keep fostering awareness
  - Keep periodic training and communication fresh
  - Keep listening
- Be seen to act on concerns
  - Respond to reported concerns
  - Protect whistleblowers from retaliation
  - Take clear and visible steps to remedy issues and incidents

Outward-facing measures
- Send a clear message to customers, suppliers and stakeholders
- Make use of right to audit and compliance clauses
- Conduct risk-based third party due diligence

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