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

Matthew Kinch | Associate Director
Sam Fox | Director

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

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Compliance challenges facing today’s businesses
### Compliance challenges facing today’s businesses

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

**External**
- Corruption
- Sanctions and export controls violations
- Anti-trust
- Fraud
- Data theft and cyber-extortion

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**Case study – ‘We need a compliance system…’**

This 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 anti-corruption legislation
- Need for compliance recognised by board and shareholders
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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 rollout
  - 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 doesn’t 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 rollout
  - Who does what?
  - Designing the training programme
  - Making sure of delivery
  - Getting and acting on feedback
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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 – Bringing compliance to life

Some comments on common concerns
- ‘It will cost too much’
- ‘It will stop us doing business’
- ‘It is impossible to implement’

Case study – ‘Yes, but...’

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 ethics form paper policies
- Keep fostering awareness
  - Keep periodic training and communication in mind
  - Keep listening
- Be seen to do all the correct
  - 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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