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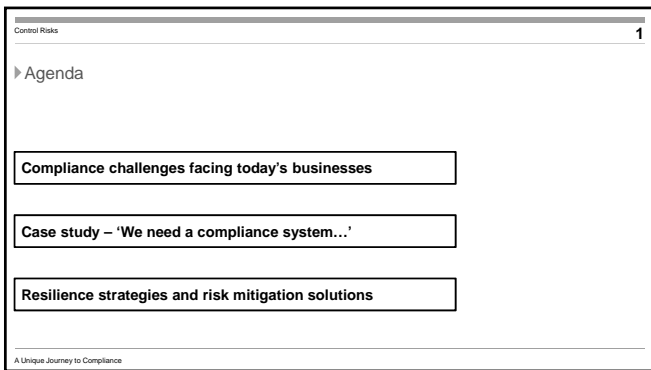
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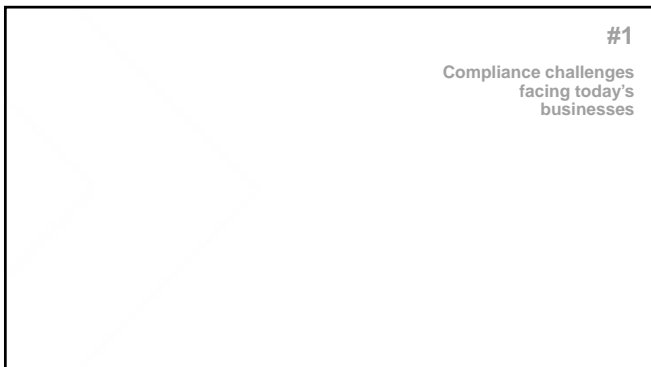
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Control Risks 3

► Compliance challenges facing today's businesses

Internal	External
► Finding the necessary people	► Corruption
► Integrating compliance into governance structures	► Sanctions and export controls violations
► Changing mind-sets and time-honoured habits	► Anti-trust
► Funding	► Fraud
	► Data theft and cyber-extortion

A Unique Journey to Compliance

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#2

Case study – 'We need a compliance system...'

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Control Risks 5

► 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

A Unique Journey to Compliance

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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 roll-out
  - Putting on the roof and landscaping the gardens
    - Getting the message across
    - Training
    - Roll-out review

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► 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

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► 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

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Control Risks 9

▶ 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

A Unique Journey to Compliance

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Control Risks 10

▶ 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'

A Unique Journey to Compliance

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**#3**

Resilience strategies and  
risk mitigation solutions

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» 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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[www.controlrisks.com](http://www.controlrisks.com)

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