Reputation matters. Remember that what you are doing today will be judged by tomorrow’s standards
Compliance framework

How can an organization protect its reputation as perceived by its customers, business partners, regulators and civil society? Which are the relevant standards an organization has to consider in order to meet societal expectations that often go beyond legal requirements? How can an organization effectively defend itself and its employees against the risk of non-compliance?

### Third parties

#### Risks
- Corruption and Bribery – Fraud
- Contraband / Counterfeit
- Anti-Money Laundering
- Counter-terrorism financing
- Human Rights – International
- Labor Conventions – National legislations on transparency in supply chains

#### Our approach
- Third-party anti-corruption programs
  - Technology-based solutions and enforcement programs
  - Track and trace technology
  - Background checks and corporate intelligence
  - Third-party risk management program
  - Due diligence for business partners
- "Know your Counterpart" and "Know your Customer" programs
- "Know your Supplier" programs
  - Supply chain control and monitoring processes
  - Corporate social responsibility and corporate sustainability program and reporting
  - Third-party risk management framework

### International trade

#### Risks
- Trade sanction laws (international and national)
- Export controls laws (international and national)

#### Our approach
- Sanction laws program
  - Data screening
  - Trade sanction procedure
  - Trade sanction management framework
- Export controls programs

### Corporate ethics

#### Risks
- Employee misbehavior, lack of ethical culture

#### Our approach
- Code of conduct review
- Targeted communication program
- People risk management program (including operating model, tools, reporting)
- Compliance trainings (general and specific)
- Customized compliance training, online or face-to-face
- Senior management compliance seminars
**Governance**

**Compliance assessment**

**Risks**
- Gaps in program design and effectiveness due to systems, resources and operating model
- Inadequate level of internal controls
- Non-compliance with Swiss and foreign countries’ corporate law

**Our approach**
- Compliance maturity assessment
- Compliance program transformation
- Setting up of tailored compliance management systems, based on industry best practice (including collaboration solutions among different functions)
- Compliance policies and procedures
- Integration of compliance controls within existing internal control systems
- Reporting lines (whistleblowing):
  - Internal reporting lines program
  - External reporting lines program
- Company secretarial services

**Anti-bribery, corruption and fraud**

**Risks**
- FCPA – UK Bribery Act
- National anti-corruption legislations
- Non-compliance with Swiss and foreign countries’ corporate law

**Our approach**
- anti-bribery and corruption Program
  - Risk assessment
  - Set up of an anti-bribery and corruption corporate program
  - Red flags identification processes
  - Policy, training and monitoring
  - Data analytics-based monitoring
  - People risk management framework
  - Supplier training and communication
  - Employee training and communication

**Fraud**
- Fraud prevention management system
  - Insider threat management
  - Fraud risk assessment and prioritization
  - Policies and procedures
  - Training and communication

**Compliance organization**

**Risks**
- No or incomplete investigations

**Our approach**
- Forensic investigations
- Internal investigation training program
Reviewing your Compliance Organization

An organization should review its Compliance Organization and Management System on a regular basis to ensure it effectively meets its compliance obligations, mitigates risks of non-compliance by having the right tools and programs in place, without creating unnecessary administrative burden on the corporation's operations. There are various approaches to Compliance Organization reviews, but organizations should, at minimum, perform an annual self-assessment. In addition, companies should consider a voluntary external review of their compliance function periodically (every three years). This type of independent review is based on industry specific standards, guidelines and regulations.

Three Review Pillars

- Architecture
- Implementation
- Effectiveness