



Compliance Framework

**Reputation matters. Remember
that what you are doing today will
be judged by tomorrow's standards**

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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

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

Anti-Money Laundering
Counter-terrorism financing

“Know your Counterpart” and “Know your Customer” programs

Human Rights – International
Labor Conventions – National
legislations on transparency in
supply chains

“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)

Our approach

Sanction laws program

- Data screening
- Trade sanction procedure
- Trade sanction management framework

Export controls laws
(international and national)

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

Corporate
culture

HR, competition and data protection

Risks

Non-compliance with related regulations – Compliance risks related to employee mobility, overtime, bonuses, etc.

Our approach

- Risk evaluation and health check of existing programs, in line with national and international regulations
- Setting up of a competition law program
- Assessment of liabilities
- Setting up of supporting digital solutions
- Training and communication
- Gap analysis of existing processes in the areas of data retention and data protection
- Technology-based solutions

Anti-bribery, corruption and fraud

Risks

FCPA – UK Bribery Act
National anti-corruption legislations

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

Gaps in program design and effectiveness due to systems, resources and operating model

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)

Inadequate level of internal controls

- Compliance policies and procedures
- Integration of compliance controls within existing internal control systems

Reporting lines (whistleblowing):

- Internal reporting lines program
- External reporting lines program

Non-compliance with Swiss and foreign countries' corporate law

- Company secretarial services

Compliance investigation

Risks

No or incomplete investigations

Our approach

- Forensic investigations
- Internal investigation training program

Governance

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

Compliance

Organization
Programs
Objectives
Risks
Identification

Regulatory Monitoring
Communication
Training
Corporate Culture

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