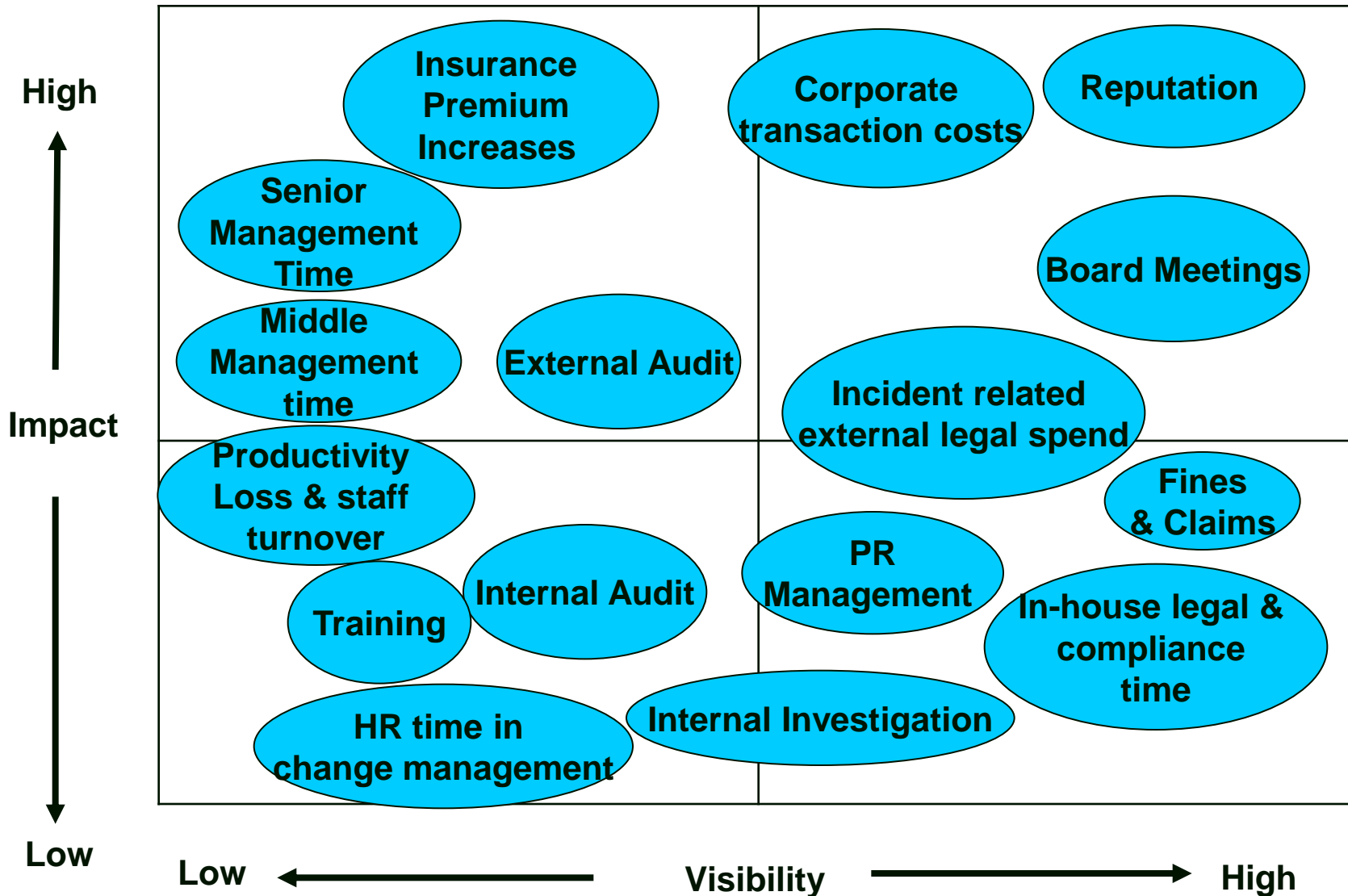


A world map serves as the background, showing continents and oceans. Three business professionals are positioned in front of the map: a man on the left, a man in the center, and a woman on the right. They are all wearing dark suits. The text 'Clarity - Coverage - Control' is overlaid in white on a semi-transparent dark band across the middle of the image.

Clarity - Coverage - Control

Paul Smith, Eversheds LLP
June 2010

The true cost of compliance



Corporate Compliance Challenges

Clarity

- ✓ Identifying the wealth of international compliance obligations
- ✓ Implementing successful cross cultural strategies

Coverage

- ✓ Deploying a compliance program that covers international legal and regulatory frameworks

Control

- ✓ Management information and reporting against KPIs to show return on investment

Compliance Project Benefits

Enhanced Coverage, Clarity & Control

Clarity

- **Aligned** principles, policies & processes
- **Clear** program of action with targeted sub-projects
- **Demonstrated** good compliance
- **Zero tolerance** of non-accountability
- **Systems investigations** addressing root causes

Coverage

- Wide **coverage** with overarching co-ordination

Control

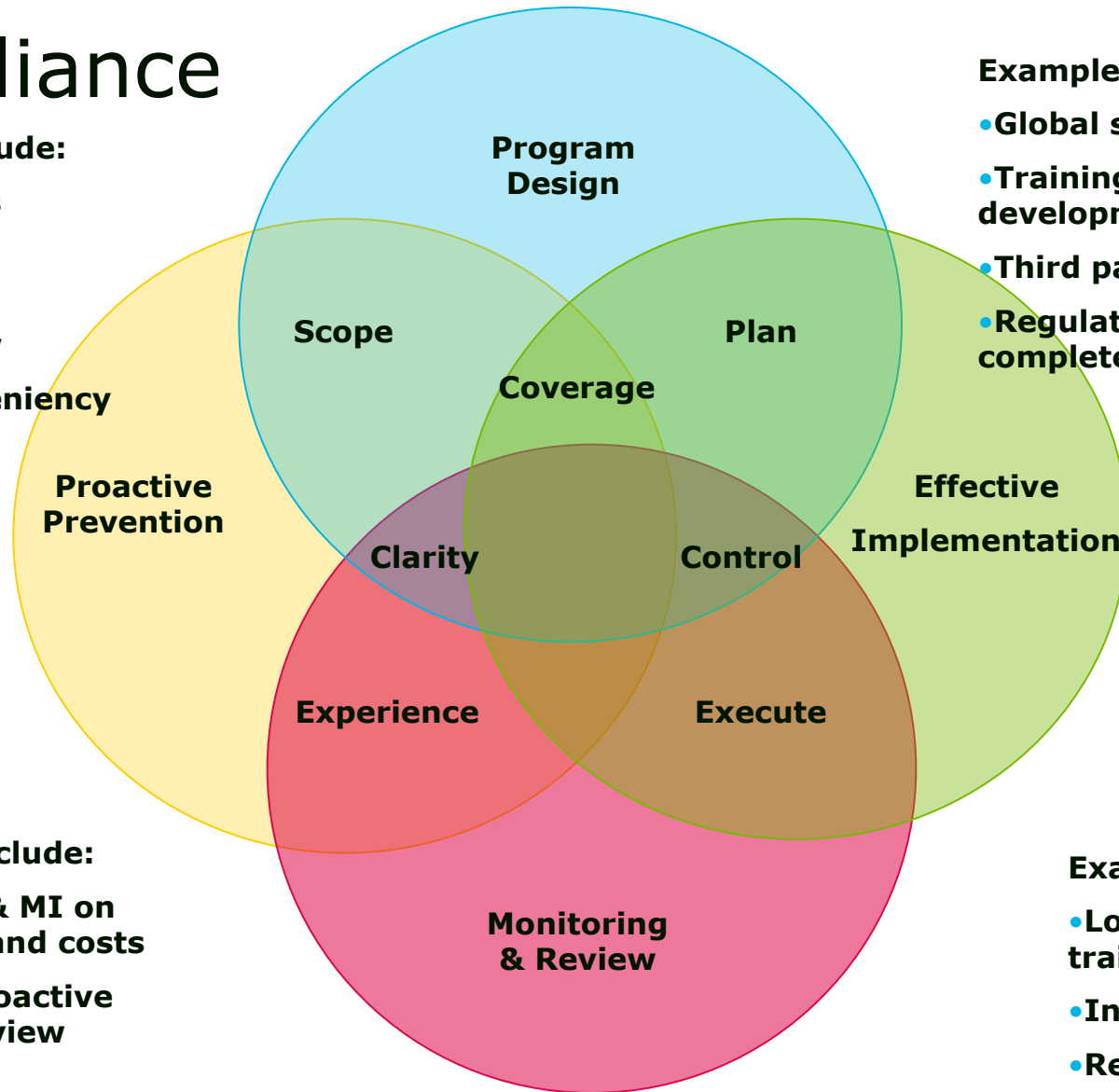
- Strategy based on **management information & KPIs**



Compliance

Examples include:

- Effectiveness evaluation
- GAP analysis
- Policy review
- Amnesty & leniency program



Examples include:

- Global suite of policies
- Training module development
- Third party due diligence
- Regulatory requirements completed

Examples include:

- Reporting & MI on experience and costs
- ECA and Proactive litigation review

Examples include:

- Local language training
- Investigations
- Reports
- Mock inspections

Top Compliance Issues

Key focus areas

- Bribery & corruption
- Anti-trust/Competition
- Trade compliance
- Data privacy
- Document retention
- Third Parties



Clear compliance measures and goals

Initial KPIs

- Compliance modules created
- Clients trained in compliance
- Compliance sessions held
- Compliance policies created
- Compliance policies revised
- Applications filed
- Permits obtained
- Audits conducted
- Process improvements



Key Compliance Milestones

A clear project plan



- Establish functions, roles and responsibilities – Q1
- Evaluation and Risk Matrix – Q1
- Global redraft of key policies – Q1
- Further policy development - Q2
- Regional/ National Customisation, if and to the extent necessary - Q2-3
- Program roll out, training development and implementation – Q1-3 and FY2011
- Continuing monitoring and evaluation – FY2011



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