



ACC'S CLO ThinkTank Series 2007

“ENTERPRISE RISK MANAGEMENT FOR THE INSURANCE INDUSTRY”

Hosted by Pat Hatler, CLO of Nationwide Mutual Insurance Company

May 4, 2007

10:00 a.m. – 2:00 p.m.

The Fairmont Washington Hotel- Washington, D.C.

* * * * *

Participants' Briefing Materials

* * * * *

SUMMARY/OUTLINE OF DISCUSSION TOPICS

Enterprise Risk Management for the Insurance Industry

The following outline is intended to provide short overview of some of the issues at the heart of this discussion topic. Enterprise Risk Management is a broad topic that includes areas of risk that may not typically fall within the purview of the legal department except in more incidental ways. This outline focuses primarily on those aspects of risk management that may be most likely to impact the law department and your role as CLO on a day-to-day basis. There may be issues that we have not identified or perspectives on the identified issues that are not adequately represented in the outline: you should feel free to raise these additional thoughts as you like.

This outline is merely intended as a starting point to help you identify discussion topics and tee up your conversation. **

I. Enterprise Risk Management Defined (See Tab 1): How does your organization define enterprise risk management? Are organizations in the insurance industry better poised to manage organizational risks given the nature of their business? Are there any downsides (financial and legal) to having such an enterprise risk management program? Within your organization, does enterprise risk management encompass some/most of the following concepts:

- *A process, ongoing and flowing through an entity*
- *Effected by people at every level of an organization*
- *Applied in strategic setting*
- *Applied across the enterprise, at every level and unit, and includes taking an entity-level portfolio view of risk*
- *Designed to identify potential events that, if they occur, will affect the entity and to manage risk within its risk appetite*
- *Able to provide reasonable assurance to an entity's management and board of directors*
- *Geared to achievement of objectives in one or more separate but overlapping categories*

(From Enterprise Risk Management – Integrated Framework Executive Summary, September 2004, The Committee of Sponsoring Organizations of the Treadway Commission)

From Idea to Implementation: What are some of the key factors your organization has identified to effectively implement an enterprise risk management program? Does your organization's approach include some/many of the following: active top-level involvement by directors and senior management, a culture of accountability, a process for identifying risks, risk and capital modeling, maintaining effective controls, extreme event management, others?

II. Organizational Structure- General (See Tab 2): What is the structure for risk management in your organization? Is there an organizational structure that is more or less effective at promoting a risk conscious culture or risk management? Are insurance

** Resource Links for Tab References may be found at the end of this document.

professionals, who are in the business of underwriting and managing risks – more or less effective in enterprise risk management? Do insurance companies already have the skills that can identify and manage risk on an enterprise wide basis? How does risk management fit with the organization's objectives as a whole?

- A. **Chief Risk Officer (CRO):** Does your organization have a Chief Risk Officer? Who does that person report to? Should the CRO be independent? What is the scope of that person's role? What (if any) is the reporting relationship between the CRO and other risk managers and the law department/CLO? Does management work jointly with the CRO to define and drive an enterprise wide risk management process?
- B. **Risk Management Group:** Does your organization have a centralized risk management group? Who does the head of that group report to? What are the functions of the risk management group? Are they involved in: (1) Setting policy and strategy for risk? (2) Championing risk management at the strategic and operational level? (3) Building a risk aware culture within the organization through training and education? (4) Establishing internal risk policy and structures for business units? (5) Designing and reviewing policies for risk management? (6) Coordinating functional groups and activities that advise on risk management issues within the organization? (7) Developing risk response processes, including contingency and business continuity programs? (8) Preparing reports on risk for the board and the stakeholders? Is this asking too much? Are there tasks that are missing? How does the risk management group co-ordinate between divergent business units, divisions or territorial lines? How does your organization link organizational and business units and priorities with a centralized risk management function?
- C. **Chief Legal Officer/Law Department's Role:** Are you as CLO also the CRO? What are the pros and cons of having the CLO be the CRO? How do you balance these multiple hats? If you're not the CRO, does that individual report to you organizationally? What are the pros and cons of having the CRO report organizationally through the law department? Who is on point to provide legal support to the CRO? Should all work performed by the CRO/risk management group be done under the auspices of the law department/CLO to provide the basis for a privilege claim? Does self-evaluative privilege apply?
- D. **Management's Role:** What role do your organization's C-Suite executives play in risk management? How do they help set the tone and create your organization's culture with regard to risk management? Is there a culture that is more or less effective at promoting risk management? Does this culture exist in the insurance industry? How do executives communicate their expectations regarding risk management? Does your organization incorporate risk management into strategic business plans?
- E. **Board of Directors:** What role does the Board of Directors play with regard to risk management? Who advises the board on risks-- the CLO or the CRO or both? Are there conflicts? How has your role changed in recent years? Does your Board

regularly consult independent outside counsel and/or request their presence during Board meetings to provide independent advice on risks? What types/frequency of reports on organizational risks are provided to the Board? Who presents these reports? What is the role of the law department in developing, reviewing and/or presenting these reports? Are they verbal or written? Are they presented to the full Board or to specific committees? Are outside counsel or outside auditors generally present when these reports are provided?

- F. **Additional Functional Groups; Risk Management Committee:** What other functional groups play leading roles in risk management? Does your organization have an internal audit function and what role do they play? What about security? Do functions such as underwriting and claims management have a role to play in this process and how do they interact? Does your organization have a cross-functional Risk Management Committee to advise on policy and practices? Who is on the committee? How often does it meet and what is its basic charter? What role do you as CLO/does the law department play with regard to the committee and advising the committee?

III. Approach to Risk Management; Policy & Resources

- A. **Scope of Risk Management:** Is enterprise-wide risk management best? Should risk management approaches be tailored, or be grouped by entity, division, business unit, geographic location or by type of risk (financial, operational, regulatory, criminal) or do we leave behind these silos in favor of a holistic approach to considering risks and returns?
- B. **Allocating Resources:** While enterprise risk management is increasingly on the corporate radar, are there specific issues that put enterprise risk management front and center in an organization? How do you prioritize risk management activities? How do risk managers, CROs, CLOs or others in the organization secure the financial commitment to fund enterprise risk management within an organization? How do organizations allocate resources to the risk management group and risk management functions? What has worked in advancing risk management priorities in our organizations? What has not worked? What lessons can be learned?
- C. **Risk Management Policy:** Does your organization have a written policy on risk management that applies company-wide or are there separate policies by unit, division, geographic location or type of risk? How are they divided? Is it necessary for these policies to be in writing? Can we create a risk sensitive culture and avoid written policies? What are the key provisions of the policy? Does it include (1) the standards and approach to risk; (2) standards and approach to risk management; (3) responsibilities throughout the organization or by sector; (4) legal requirements governing the organization; (5) policy statements? More/Less? What process should an organization use to identify the full scope of all of the risks to be addressed by the policy and to prepare the policy itself? What are some of the key drivers to a risk

management policy? How often is it updated? How is it communicated? Who has access to it?

- D. Identifying Organizational Risks; Process:** Risks areas which organizations may be vulnerable can include: Strategic and Reputation; Financial and Liquidity; Operational (including IT and Internet); Corporate Reporting; Business Practices and Regulatory, and more. Has your organization gone through a process to identify organizational risks enterprise-wide? How do you identify risks in a methodic way to ensure that all significant activities within the organization have been identified? Does your organization's approach to identifying risks include classifying risks (e.g., significant or material, etc..) and/or creating some sort of risk matrix? If so, what types of standards or guidelines did your organization use to make these distinctions? How does your organization prioritize those risks in a meaningful way? Structured interviews, internal audits, a separate audit function (and maybe even separate audit functions for financial risks versus other risks) are some options; are there others?
- E. Who Identifies Risks:** Are lawyers too conservative to be charged with identifying risks? What are the pros and cons of using internal vs external resources (e.g., outside counsel, consultants, etc..) to identify risks? While external risk managers may be seen as more objective do they really understand the organization? Are they trying to create risk to create work? Are internal resources biased against change or identifying weaknesses? What information is required to identify risks (e.g., knowledge of the organization, the market, the legal/ social/ political/cultural environment within which the organization exists, strategic and operational objectives, etc..)?

IV. Some Risk Areas Explored: Following are some organizational risk areas that may be top-of-mind for CLOs in the current business environment. The list is not exhaustive, but highlights some discussion issues to consider.

- A. Crisis Management** (See Tab 3) – Does your organization have a crisis management policy and/or teams? Is the team multi-disciplinary and cross-functional? Is the CRO and CLO a part of the team? Is training provided? How often? Do you run formal training exercises? Who is involved? Do you have established protocols and notification systems? Do you have a business continuity/disaster recovery system?

What are the key problem areas for in-house counsel in protecting against crises? Do you have separate protocols for handling crises depending upon the nature of the situation? How does your legal department help the company identify points of vulnerability? What was the process for assessing the key risk areas to develop crisis management and response protocols? Do your greatest concerns relate to high-profile litigation, governmental investigations, financial practices and reporting, natural disaster or force majeure-type events, other? What steps do you take to manage company response, communication and potential liability?

- B. Reputational Risk Management** (See Tab 3) : Has your organization created executive-level committees for handling policy and strategic issues relating to organizational reputation and public disclosure issues? What is your role as CLO on these committees? Who chairs these committees? Are you a working member of the committee or an advisor to the committee? What is the scope of responsibilities/charter for these committees? What is the role of the Board? Who advises the Board on reputational risk issues? Does the organization have a reputational risk policy? Who is involved in drafting and implementing this policy?
- C. Media Relations** (See Tab 4): What is the role of the law department in dealing with the media? Do you provide advice to Public Relations and/or executive management on what to say and not to say? Has the law department developed guidelines for responding to media in a crisis situation? In your view, what are key features any policy should have? Do these policies extend to outside counsel? In what situations might you as CLO be the spokesperson? What are the pros and cons of having a lawyer be the spokesperson? What training do you receive/provide? What are the most typical challenges you/law department faces in connection with providing information to the media? What types of processes have you implemented to help ensure accuracy of information provided? Who makes the final determination on the scope and timing of information release (CLO, CEO, Head of Public Affairs, other?)?
- D. Emails; Corporate Communications** (See Tab 5): Does your company have a policy with regard to use of email? Is it part of a broader records management policy or a separate policy? What are the pros and cons of having a separate policy? What are the key provisions of the policy? How do you enforce it? What types of training do you provide to employees with regard to creating and using email? What security practices do you implement with regard to emails? Do you monitor employee emails? How do you set and manage email retention practices? Is there a need to try to limit email use or is that futile/counterproductive to doing business?
- D. Financial Compliance/Risks** (See Tab 6): What is the law department's role in connection with the company's financial compliance and internal financial controls programs? Does the law department have responsibility for running the company's financial compliance/ controls programs OR does the law department play a supporting role, have no role, or something in between? What policies are in place regarding reporting financial concerns or allegations of financial fraud? Does your company have a separate policy for these matters or is there a broad policy for reporting concerns generally? Is there an obligation/requirement OR an expectation/encouragement to report such concerns? How are the company's policies communicated to employees—through governance policies, Code of Business Conduct/Ethics, etc.? Do you have a separate Code of Conduct for finance professionals and the CEO or does a more general Code of Conduct apply to all employees?

What channels are available for reporting financial concerns? Is there a direct line to the Audit Committee? Is there a direct line to the CLO? Is

there an opportunity to submit a confidential or anonymous report? Are there different mechanisms in place for different parts of the company or is your program implemented globally? (See Section IV below for more on reporting channels)

- E. Corporate & Executive/Director Liability:** How are prosecutorial tactics and criminal cases against executives impacting business processes within your organization? Are you involved in and consulted on more or less matters? Do executives and/or the Board want more in writing? What are some of the key changes your organization has made to address concerns regarding personal liability? Are Directors and/or executives requesting greater protections (via D&O insurance, indemnification agreements or otherwise)? Do they want their own independent counsel present during Board meetings? What practices have you implemented in connection with these requests/to accommodate outside counsel for the Board? What protections do you have as CLO? Are your in-house lawyers covered by D&O insurance or other indemnification protections? Are they concerned about their own personal liability and how do you manage these concerns? How do you balance your role as lead lawyer for the organization in situations when executives or Directors may share sensitive information and want guidance but want those discussions to be maintained as confidences?
- F. Investigations- Regulatory & Internal** (See Tab 7): (a) Regulatory Investigations: What is the role of the risk management team in regulatory investigations? Who manages the investigation? What is the role of the law department? How do you determine whether to staff legal support with in-house or outside counsel? How does your organization manage multi-jurisdictional investigations and the different regulators and law enforcement agencies? Do you have protocols on internal notifications? (b) Internal Investigations – What processes does your organization have to perform internal investigations and root cause analyses? What roles do the CRO and CLO play in this? Does your organization have a preference to establish internal investigations as privileged (all or some)? What types of factors do you consider in determining staffing and the desire for privilege protection? What types of reports does the Board receive of internal investigations? Does your organization have formal processes for after action reviews?
- V. Systems to Prevent/Manage Risks** (See Tabs 8-10): What types of systems and practices are in place to help prevent/manage risks? Are these systems implemented on a company-wide basis? What are the pros and cons of having a company-wide approach to managing risks in a global company?
- A. Code of Conduct; Governance** (See Tab 8): Does your company have a global code of conduct or are there broad global principles on conduct with tailored codes adopted by various business units? What was the process for creating the Code/principles? What was the role of the law department? Does it apply to all employees worldwide? Does it apply to your organizations wholly-owned subsidiaries, others?

- B. Channels for Reporting Concerns (See Tab 9):** What types of systems for reporting concerns are present within the organization? Does the company have an ombudsperson, a helpline, a complaints systems or an intranet portal in place? Is there a whistleblower policy? Who monitors these? How are these set up? What is the role of the law department? Are there other organizational approaches for receiving and responding to concerns? Are blogs and weblogs an opportunity to identify and manage employee concerns or do they create more problems? What is the role of the CRO, CLO/law department in evaluating and responding to reports, or other sources of complaints? What type(s) of training (and who receives it) is in place to help prevent/manage these systems and complaints that arise? Does the company have teams or committees on point for assessing, responding and managing risks?
- C. Sarbox 307 Attorney Professional Conduct Standards: “reporting-up” (and out) rules and exposure to sanctions or disciplinary action**
- **Up-the-ladder reporting systems and channels for reporting (supervisory attorneys, audit committees, CLO, QLCC, etc.):** What types of reporting-up policies have you developed within your legal department? Does your system include written certifications from lawyers within your department? What’s the CLO’s role in facilitating or implementing such policies?
 - **Training and Guidance:** What types of ethics/compliance reporting training is provided to in-house lawyers? How do supervisory lawyers or CLOs distinguish when discussions are 307 discussions versus requests for guidance?
 - **Role of in-house lawyer:** Do “changing” professional conduct standards have a chilling effect on client willingness to seek preventive legal guidance? Do you see this at the C-Suite level?
 - **Interface with outside counsel on Sarbox 307:** Do they sign onto your policy? Do you receive copies of their policies? Are there requirements for them to notify you or designated individuals within the law department simultaneously with performing their own internal review of whether a Sarbox 307 issue has been identified?
 - **Liability Concerns:** Are in-house lawyers asking about corporate protections available to them in light of their increasing exposure (vis-à-vis the SEC and the bar) pursuant to Sarbox 307?
- D. Compliance and Ethics Programs (See Tab 8):** What is your organization’s approach to creating an effective compliance and ethics program? How does your organization create and sustain an ethical culture? What is your role as CLO in developing and implementing these programs? Is your organization’s approach centralized (e.g., with a central compliance and/or ethics function) or de-centralized (with business and functional units on point for developing and implementing their own programs)? Are you the Chief Compliance Officer and/or the Chief Ethics Officer? What are the pros and cons of having the CLO also play these roles?

- E. Training:** What types of training does your organization provide to help prevent against and manage risks? Has your organization taken a global approach to training? Do you use web-based modules, in-person training, other types? What types of training or education guidelines do you have for your Board? Are these guidelines or requirements? Are employees required to periodically complete training and certify compliance or completion? What are the key training modules for your organization? Did you develop these in-house or purchase them off the shelf (and perhaps tweak them)?
- F. Audits:** How often are audits performed? What types of reports are generated on risks and risk management performance? Who generates these reports? How often? Who receives them? What do they contain? Are reports made verbally or in writing? Is there technology available to help out? How does your organization leverage expertise in the organization – accounting, underwriting, claims management, reinsurance expertise - to assist in identification, analysis and reporting of risks? What types of scenarios trigger further analysis or re-evaluation? Is the cost of this approach prohibitive? What has worked in the past?
- G. Metrics:** Does the company use metrics to assess how the company is managing its risks? What are some of the key metrics? Are these metrics enterprise-wide or specific to business operations or risk areas? What type of tracking system/metrics have you developed to monitor and measure risks? Can or should risk management be built into strategic planning processes? Is enterprise risk management linked to an organization's performance management objectives? What is the best way to ensure that senior legal counsel or executives with oversight responsibility are able to easily monitor enterprise wide risk management and detect and address emerging issues?
- H. Reporting:** What is the role of the CRO/CLO/law department in measuring and reporting? What are the best practices? How do we manage internal risk reporting to business levels, senior management and the Board of Directors? What about external reporting? How do enterprise risk management programs and policies interact with regulatory agencies (generally and specific to the insurance industry), rating agencies, corporate governance guidelines and regulations? Is there requirement for public disclosure of risk issues in regulatory filings or in other media? What types of reports are generated on risks and risk management performance? Who generates these reports? How often? Who receives them? Are reports made verbally or in writing? What types of reports are made to the Board? What is the role of the CLO/law department?)
- I. Allocating Risks:** How do organizations allocate residual risks? What are the options for funding the residual risks? Standard off the shelf insurance, manuscript or customized insurance, blended insurance, alternative risk financing (captives or self-funded), capital market solutions. What are the advantages and disadvantages of each? What experiences have people had? What are the limits?

VI. Protections: Insurance & Indemnification (See Tab 10)

A. Directors & Officers Liability Insurance Coverage

- **Scope of coverage:** Do you have a D&O policy that covers you as the CLO, or is your coverage under the policy limited to services you may provide in your executive officer capacity? Does the policy include an exclusion for professional services? How do you distinguish what services you're providing as an executive officer (which might be covered) and as the General Counsel (which may or may not be covered depending on how the policy is written)?
- **Trends in negotiating coverage:** what types of information are underwriters seeking in discussions to cover you as CLO? What types of exclusions? How are premiums being impacted? What are your experiences in negotiating and trying to carve back exclusions relating to your coverage as General Counsel? Success stories/practical considerations in negotiating coverage?
- Who advises on procuring and negotiations: Who is on point to provide legal advice during the procurement and negotiation process for D&O coverage? Are you consulted to advise the company or other C-Suite executives on the scope of the coverage?

B. Indemnification

- **Corporate By-laws:** Do your organization's By-laws include an indemnification of employees and would this extend to you as CLO? What limitations on indemnifications are of concern to you personally?
- **Indemnification Policy:** Does your organization have an indemnification policy that applies generally to C-Suite executives? Does the policy apply more broadly to all employees?
- **Individual Indemnification Agreement:** Do you have a separately negotiated individual indemnification agreement that runs to you as CLO? What are the pros and cons of having this type of agreement? How often do you revisit it? Who negotiated with you on behalf of the company when you were procuring this indemnity?
- **Scope of coverage:** What are the pros of having an indemnification agreement? What are the key terms that you want to see in the agreement? What gaps does it fill that might not be clearly covered in D&O? Does it provide for advancement of attorneys' fees?

C. Professional Liability Insurance

- What are the pros and cons for obtaining this coverage? What were the key issues in negotiating this coverage? Were the negotiations contentious? What type of due diligence did your carrier perform? If this wasn't your first time negotiating for coverage, how did it compare to negotiations for previous years? Are there opportunity areas to advocate for better coverage

options or sticking points in negotiating with carriers that CLOs should be aware of?

- Have you obtained separate professional liability insurance? Has your organization reimbursed you for the premiums?

Links to Resources for Tab 1:

PricewaterhouseCoopers Study – Enterprise-wide Risk Management for the Insurance Industry

<http://www.acc.com/resource/v8650>

(Used with permission from PricewaterhouseCoopers)

Links to Resources for Tab 2:

ACC Article – General Counsel as Lawyer-Statesman

<http://www.acc.com/protected/pubs/docket/may04/ideal.pdf>

ACC Survey – General Counsel as Risk Manager 2004

<http://www.acc.com/resource/getfile.php?id=4961>

ACC Program Material – Best Practices for Managing a Risk Insurance Program

<http://www.acc.com/resource/getfile.php?id=8209>

Links to Resources for Tab 3:

Ogilvy Renault Article – 6 Principles for Successful Crisis Management and Resolution

<http://www.acc.com/resource/v8351>

Ogilvy Renault Article – Damage Control, Corporate Counsel’s Role In Containing and Resolving Corporate Crises

<http://www.acc.com/resource/v8350>

Ogilvy Renault Article – 6 Stages in Preparing and Executing an Action Plan

<http://www.acc.com/resource/v8349>

ACC Article – Leading Practices in Crisis Management and the Role of In-House Lawyers

<http://www.acc.com/resource/getfile.php?id=5908>

NACD Article – Is My Company Really Ready for a Crisis?

<http://www.acc.com/resource/v8604>

Links to Resources for Tab 4:

Ogilvy Renault Article – Dealing with the Media, Corporate Counsel’s Role in Containing and Resolving Corporate Crises

<http://www.acc.com/resource/v8354>

ACC Executive Bulletin – CLO as Spokesperson with the Media: Be Responsive, Prepared and Proactive

<http://news.acca.com/accaexec/issues/2007-03-21.html>

ACC Program Material – Dealing with the Media: Right, Wrong, & Otherwise

<http://www.acc.com/resource/getfile.php?id=6831>

Links to Resources for Tab 5:

Shearman & Sterling Article – Risk Management Tool: How to Educate your Client Not to Create Dumb Documents

<http://www.acc.com/resource/v8627>

Shearman & Sterling Article – Federal Rules of Civil Procedure: E-Discovery Amendments

<http://www.acc.com/resource/v8628>

Corporate Counsel Magazine Article – Corporate Governance D&O Advisor: A Disney Tale

<http://www.acc.com/resource/v8621>

Ogilvy Renault Article – Top Ten Training Tips on E-Communications and Records Management

<http://www.acc.com/protected/clo/recomrecordsmanagetop10.pdf>

Ogilvy Renault Article – Email Retention: Striking the Right Balance

<http://www.acc.com/protected/clo/strikingrightbalance.pdf>

Ogilvy Renault Powerpoint – The Dangers of Electronic Communications

<http://www.acc.com/protected/clo/dngrsofeleccom.pdf>

ACC Article – Top Ten Tips for Corporate Counsel in Dealing with the New FRCP on e-Discovery

<http://www.acc.com/protected/reference/tech/ediscovery.pdf>

ACC Article – Trends in Discovery of Electronically Stored Information

<http://www.acc.com/resource/getfile.php?id=8044>

ACC Article – e-data and Discovery

<http://www.acc.com/resource/getfile.php?id=8043>

Links to Resources for Tab 6:

ACC Executive Bulletin – CLO's Role in Financial Compliance

<http://news.acca.com/accaexec/issues/2006-08-02.html>

ACC Article – Lessons Learned the Hard Way: Ten Flags of Possible Financial Mismanagement & and Fraud

<http://www.acc.com/resource/getfile.php?id=7714>

ACC Article – Providing In-House Legal Support to the CFO & Finance Function

<http://www.acc.com/resource/getfile.php?id=5902>

ACC Article – Responding to Auditor Requests

<http://www.acc.com/resource/getfile.php?id=5829>

Links to Resources for Tab 7:

Shearman publication/article by Molo: Maximizing the Company's Chance of Successfully Resolving a Government Investigation

<http://www.acc.com/resource/v8651>

Ogilvy Renault Bulletin – Tips for Investigators and the People Who Retain Them

<http://www.acc.com/resource/v8622>

ACC Article – What to do when the Whistle Blows: The Dos and Don'ts of Internal Investigations

<http://www.acc.com/resource/getfile.php?id=4853>

ACC Article – Recent Trends in Internal Investigations

<http://www.acc.com/resource/getfile.php?id=8312>

ACC Article – Managing an Internal Corporate Fraud Investigation and Prosecution

<http://www.acc.com/resource/getfile.php?id=8313>

Links to Resources for Tab 8:

Shearman & Sterling Publication – 2006 Trends in the Corporate Governance Practices of the Fortune 100

<http://www.acc.com/protected/clo/2006fortune100corpgovpractices.pdf>

Shearman & Sterling Symposium – Corporate Governance 2006

<http://www.acc.com/protected/clo/corpgovsymposium2006.pdf>

ACC Article – Providing In-House Legal Support for Corporate Governance Initiatives

<http://www.acc.com/resource/getfile.php?id=5901>

ACC Article – Law Department's Role in Developing and Implementing a Compliance and Ethics Program

<http://www.acc.com/resource/getfile.php?id=5909>

Links to Resources for Tab 9:

ACC Article – Leading Practices in Corporate Governance Programs for Reporting Concerns
<http://www.acc.com/resource/getfile.php?id=6527>

Links to Resources for Tab 10:

ACC Article – The Hidden Insurance Issues behind Sarbanes-Oxley and Recent Corporate Governance Reform

<http://www.acc.com/resource/getfile.php?id=5716>

ACC Article – Insurance and Indemnification Practices for In-House Lawyers

<http://www.acc.com/resource/getfile.php?id=6300>