

EVERSHEDS
SUTHERLAND

Is your business in good shape?

Find out with our Global
Compliance Solutions



Introduction

The regulatory burden on business is increasing, along with the need to understand risk and compliance across global workforces and operations. Whilst human rights and modern slavery are becoming more prominent risk categories to consider during due diligence and post-deal integration, the new General Data Protection Rules will see potential fines for breaches rocket from £500,000 to £18 million or 4% of group annual turnover.

When you factor in the strict regulations that apply in different jurisdictions across anti-bribery and corruption, competition, anti-money laundering, trade, sanctions and health and safety – and the serious punishments for individuals and companies who fail to comply – it is easy to see why risk and compliance has become such a minefield for businesses, especially those operating in multiple jurisdictions.

As one of the biggest global law brands in the world, we understand these challenges and have worked with our clients and a leading technology provider to develop Global Compliance Solutions – which can meet your corporate risk and compliance needs, through a bespoke program offering different approaches.

Global Compliance Solutions offers Gold, Silver and Bronze programs dependent on your risk appetite and budget. At the Bronze level, for a fixed price, you will receive an automated RAG rated report with legal analysis and mitigating action plans. Building upon this information the Silver and Gold offerings provide more bespoke analysis, documentation reviews, workshops, interviews and detailed ‘deep dive’ audits of a particular area combining SME lawyers and consultants.

Technology

Eversheds Sutherland has worked with market leading technology provider 3GRC to develop Global Compliance Solutions which uses Web enabled cloud – based Risk Management portal technology to enable high levels of automation for the client in analysing their risk and compliance exposures.



Global Compliance Solutions



Paul Worth, Global Co-Head of Litigation

Highlighting the key functionality of Global Compliance Solutions

"We were impressed with the calibre of both the legal and compliance support we received from Eversheds Sutherland. Having the legal expertise and compliance assurance team under the same roof was extremely effective – we really like the model. Eversheds Sutherland provided a seamless one stop shop in circumstances where we otherwise would have had to instruct separate law and consultancy firms."

**Head of Compliance,
Major Financial Institution**

Why choose Eversheds Sutherland's Global Compliance Solutions?



Bespoke

A risk and compliance review program tailored to your business model needs and requirements



Enhancement to the M&A process

Ability to enhance an M&A transaction through focused compliance integration



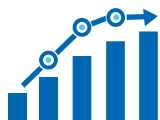
Scale and speed of delivery

A packaged global solution using our scale and global reach of 66 offices across 32 countries we can mobilize resources quickly



Cost-effective

Fixed fee one package solution involving 'deep dive' audit programs across multiple disciplines



Efficient

Market leading technology allows automated risk analysis across key corporate risk areas, lowering exposure to unknown risk



Depth of risk and compliance experience

We are trusted advisors to some of the world's largest institutions and work with them to proactively manage and mitigate legal and regulatory risk; assess and influence regulatory policy and manage the implications of legal and regulatory change. We have vast experience in all areas of corporate compliance including:

- [anti-bribery and corruption](#)
- [money laundering and sanctions](#)
- [data privacy and GDPR](#)
- [competition law](#)
- [modern slavery](#)
- [health, safety and environment](#)
- [crisis management](#)
- [product safety](#)
- [pay audits](#)



On-line tools and resources:

- [GDPR hub](#)
- [anti-bribery@work training](#)
- [business and human rights hub](#)
- [guide to environmental law](#)
- [global sanctions guide](#)
- [competition law online toolkit](#)
- [Ethics at work](#)

Our services

We have developed three levels of review service. You can either decide on a particular level of service at the outset or deploy the review services sequentially, starting with Bronze and using it to identify areas or geographic regions where you require a more focused and bespoke approach. Whichever approach you decide upon, we develop the review program in conjunction with you so it fits with your precise business model and review requirements. We also build on previous review/audit activity and due diligence that you have undertaken to ensure that we provide the most cost effective and efficient program for you.



Example RAG rated risk report

Offering	Bronze	Silver	Gold
On-line electronic survey	🏅	🏅	🏅
RAG rated risk report based on survey	🏅	🏅	🏅
Board focussed executive summary	🏅	🏅	🏅
Key Legislation identified	🏅	🏅	🏅
Risks and Issues dashboard identifying high, medium and low risks	🏅	🏅	🏅
Action and implementation plans	🏅	🏅	🏅
Presentation of the findings to key decision-makers	🏅	🏅	🏅
Data gathering exercise and desktop review of documentation	🏅	🏅	🏅
Interviews with key personnel		🏅	🏅
Coordinate and host workshops for decision-makers to identify risk areas		🏅	🏅
Detailed summary report from interviews and consultations		🏅	🏅
Design of Target Operating Model and Compliance/Risk Framework			🏅
Policy and Procedure development			🏅
Training, Education and eLearning program			🏅
On-going monitoring review program			🏅
Internal Audit programs			🏅

Our capabilities: case studies

Our team has advised many large corporates on multi-jurisdictional risk and compliance:

Cisco - We are currently on a two year engagement with Cisco, obtaining compliance and legislative detail for 50+ countries using a bespoke RAG-rated questionnaire, with the outcomes being delivered globally to their compliance teams via our online compliance portal.

UDG Healthcare - We have successfully delivered a global compliance model and framework design for 20+ countries spanning EMEA, APAC and the Americas for UDG Healthcare plc, who manufacture medical devices. This included legal risk assessment, development of an in-country regulatory risk register and compliance strategy due diligence model.

DuPont - We undertook an eight-month project with DuPont in the US. The project incorporated full development of legal and compliance Health, Safety and Environment (HSE) Corporate retention schedules across 20+ EMEA countries with training support. Additionally, in eight UK and Ireland locations we undertook on-the-ground compliance audit implementation.

AB Volvo - We acted on one of EC's largest competition law investigations to date, leading to the Global Competition Review award for "behavioural matter of the year 2017".

Global diversified industrial manufacturer - We conducted a risk investigation into whistleblowing allegations in China. The investigation involved advising on English, US and Chinese law and co-ordinating investigations across countries.

Global industrial manufacturer - We worked with the manufacturer across 25+ EMEA countries performing risk assessments and evaluating their current global operating licenses and permits.

Walt Disney Company - We have successfully worked with their Records and Information Management Compliance department in California on delivery of its records retention schedules for 60+ countries spanning EMEA, APAC and the Americas.

Major energy sector client - We conducted a due diligence risk assessment, supply chain mapping and human rights governance gap analysis including delivery of training on the UK Modern Slavery Act and human rights global reporting standards.

Major publishing organization - We provided legal advice and guidance on their human rights and modern slavery reporting obligations including mapping their value chain, drafting a slavery and trafficking risk report, directing future audit and due diligence actions and reviewing their first modern slavery statement.

Key features of Global Compliance Solutions



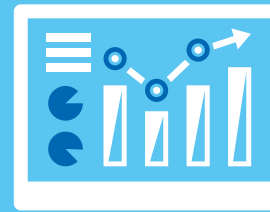
Security

Cloud-based risk platform technology accessible globally



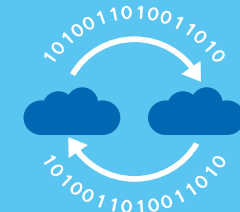
Expertise

Combination of legal and consulting subject matter expertise including lawyers, risk managers, compliance specialists and internal auditors who have helped to design 'Global Compliance Solutions'



Customization

Customizable surveys tailored to your business' needs



Knowledge transfer

Provision of structured training and equipping underlying business units to effectively manage legal, corporate and compliance risk. Thought leadership is used to influence regulatory policy and plan for future change both strategically and pro-actively



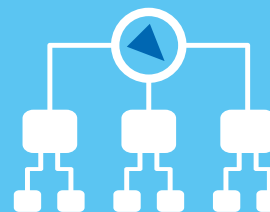
Automation

Risk based RAG rated automated functionality and automated risk register



Legal privilege

All reports generated will be legally privileged



Benchmarking

Ability to benchmark and stress test compliance frameworks against industry standard

Testimonials

"I was positively impressed by the quality and precision of the services, from simple things like written communications to the professional skills of the project leads, as well as how the whole team was led and managed. From the cost point of view, it was very rigorous and well explained, cost by cost, hour by hour."

DuPont de Nemours International Sàrl

"The health check provided an independent viewpoint on our current position, including our strengths and weaknesses relative to other legal departments. From this position, we were able to decide on the best course of action for implementing improvements to our operating model"

**General Counsel,
major construction company**

"They absolutely exceeded our expectations in terms of how they went about the work and their outputs. The level of detail was so much more than I ever expected to see."

**Head of Legal, Wholesale Markets,
Lloyds Banking Group**

"I was really impressed with the 'one stop shop' solution offered by Eversheds Sutherland, which provided us with a very effective combination of Subject Matter Expert lawyers and experienced compliance consultants to deliver our full Modern Slavery requirements, including a detailed legal risk assessment and 'RAG rated report' of our Third Party Supply Chain."

**James Jordan, Group Legal Director and Company Secretary,
Taylor Wimpey**

What happens next?

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Eversheds Sutherland (International) LLP is part of a global legal practice, operating through various separate and distinct legal entities, under Eversheds Sutherland. For a full description of the structure and a list of offices, please visit www.eversheds-sutherland.com.

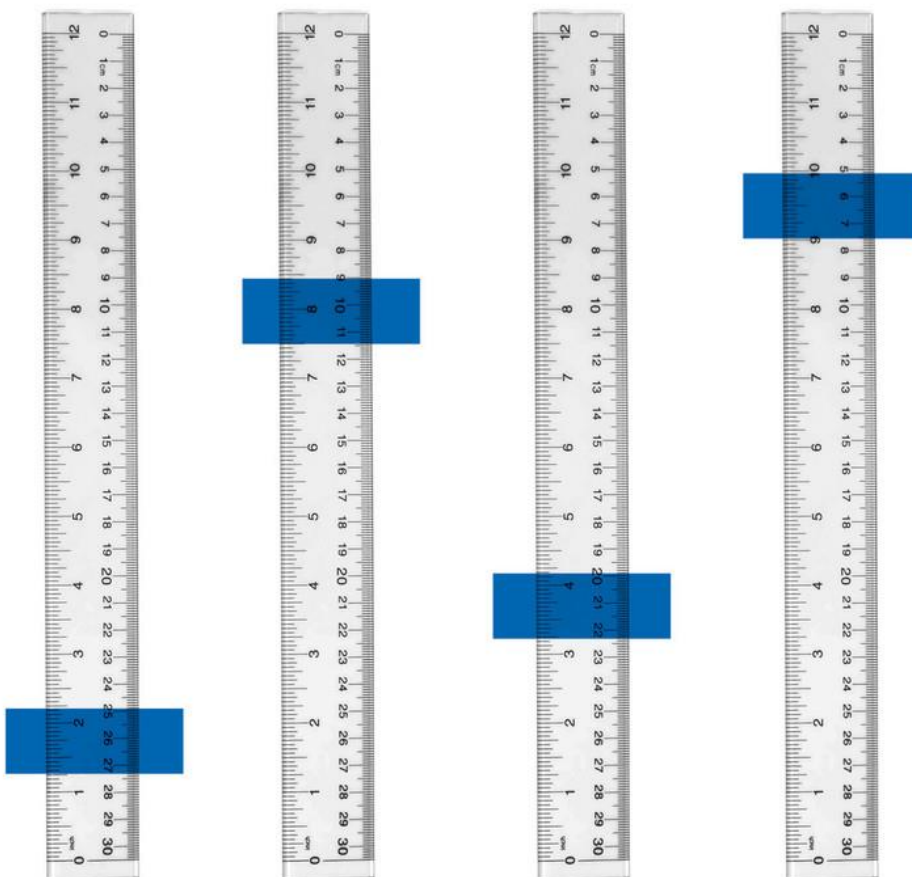
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EXAMPLE

Global Compliance Solutions Risk & Compliance Health Check

REPORT

[DATE]



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EXAMPLE

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EXAMPLE

1. **Executive Summary**

FREE TEXT – specific to survey results, highlighting high risk areas.

EXAMPLE

2. **Understanding the background (THESE ARE WRITTEN FOR ALL AREAS AND WILL BE SPECIFIC FOR EACH AREA)**

“Modern slavery” is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Victims are coerced, deceived and forced against their free will into providing work or services. Modern slavery is a crime and a violation of fundamental human rights.

Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

The Modern Slavery Act aims to prevent modern slavery, protect victims and sets out a range of serious criminal offences and penalties, including imprisonment. The Act requires organisations that are in scope to publish an annual statement explaining what they have done during the previous financial year to ensure that modern slavery is not occurring in their (i) own organisation and (ii) supply chains.

The Act is not prescriptive but provides a list of information that “may” be included in the statement:

- the organisation’s structure, its business and its supply chains;
- its policies in relation to slavery and human trafficking;
- its due diligence processes in relation to slavery and human trafficking in its business and supply chains;
- the parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk;
- its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate; and
- the training about slavery and human trafficking available to its staff.

Where a company fails in its obligation to publish a statement under the Act, an injunction can be issued by the UK Secretary of State to enforce the duty to prepare a statement. There are no fines or penalties that can directly be issued under the Act in relation to a non-compliant public statement. There is no provision under the Act for a private right of action.

However, NGOs, unions and other pressure groups will monitor reporting under the Act. A failure to report fully or the discovery in a supply chain of modern slavery contradicting a statement is likely to cause reputational and brand damage.

Whilst the statement required under the Act is not a financial statement for the purposes of the UK Companies Act 2006, potentially it could amount to a false or misleading statement made for the purpose of inducing a person to invest or to hold onto their investment.

In the US, consumer actions have been filed against companies for knowingly making false statements when making disclosures about the steps taken to prevent the use of slave labour in their supply chains.

EXAMPLE

3. Risk Calculations

Eversheds Sutherland utilise a 5x5 Risk Matrix to identify levels/severities of risk. This is calculated by considering the category of probability or 'likelihood' on a scale of 0-5, against the consequence or 'impact' of the risk on a scale of 0-5. This type of risk matrix allows each business risk to be scored on a 0-25 scale of severity and ensures that risk is measured in a consistent format across the assessment scope.

A full overview of each risk scoring and associated severity can be found below:

		OVERALL IMPACT SCORING				
		1	2	3	4	5
L I K E L I H O O D	5	MEDIUM 5	HIGH 10	HIGH 15	CRITICAL 20	CRITICAL 25
	4	MEDIUM 4	MEDIUM 8	HIGH 12	HIGH 16	CRITICAL 20
	3	LOW 3	MEDIUM 6	MEDIUM 9	HIGH 12	CRITICAL 15
	2	LOW 2	MEDIUM 4	MEDIUM 6	HIGH 8	HIGH 10
	1	LOW 1	LOW 2	MEDIUM 3	MEDIUM 4	HIGH 5

Risk Impact Areas

Each organisational risk used within the assessment scope has been assigned impact scoring using an index of 5 impact areas. An overview of the impact areas used within this assessment and the associated scoring definitions can be found below:

- Asset or Financial Loss**

Used to measure the financial loss to the organisation if the risk was to occur.

1 - Negligible	2 - Minor	3 - Moderate	4 - Significant	5 - Acute
No or insignificant impact to revenue stream, loss or assets. No or insignificant financial penalties applied.	Impact to revenue stream or assets easily absorbed. Financial penalties noticeable but not going to cause undue distress to the business.	Impact to revenue stream or assets may impact other business areas or key processes. Financial penalties may cause damage.	Impact to revenue stream or assets causes significant impact to other business areas or key processes. Financial penalties cause significant damage.	Impact to revenue stream or assets causes acute damage throughout the organisation. Financial penalties or sanctions severely hinder the business.

- Continuation of Services**

The impact to the ongoing operation and services provided by the organisation.

1 - Negligible	2 - Minor	3 - Moderate	4 - Significant	5 - Acute
Minimal impact to availability or continuity of supporting systems or processes.	Minor impact to availability or continuity of supporting systems/processes which can be rectified.	Impact to availability or continuity of supporting systems/processes which cannot be rectified. Impact to limited environment.	Significant impact to availability or continuity which cannot be rectified. Impacts the wider community and/or public facing systems.	Severe impact to availability or continuity which cannot be rectified. Impacts a vast majority of services or processes within the business.

EXAMPLE

- Quality of the Services**

What would be the impact on the product and/or service provided by the organisation.

1 - Negligible	2 - Minor	3 - Moderate	4 - Significant	5 - Acute
Minimal impact to the quality of services provided by the business or third parties operating on the behalf of the business.	Quality of services is perceived to be reduced by a small number of clients or third parties. Limited processes are affected.	Quality of services is perceived to be partially reduced by a large number of clients or third parties. May extend to a wider number of processes.	Quality of services is perceived to be significantly reduced by most clients or third parties. Either a specific service process is severely affected or a wider number to a lesser degree.	Severe impact to a majority of services provided by the business or third parties operating on the behalf of the business. A vast majority of clients or third parties affected.

- Health & Safety**

Is there an impact to the health and safety of the staff, client, third party, or public

1 - Negligible	2 - Minor	3 - Moderate	4 - Significant	5 - Acute
Minimal impact to health or potential for injury.	Minor, short term impact to health or potential injury which does not result in work absence.	No permanent impact to health or potential injury which results in temporary work absence.	Potentially permanent impact to health or injury which can result in permanent work absence.	Potential loss of life or permanent disability.

- Reputation**

Used to define the reputational damage to the organisation, or brand of the organisation.

1 - Negligible	2 - Minor	3 - Moderate	4 - Significant	5 - Acute
Minimal detrimental impact to the reputation of the business. No impact to relations with third parties.	Minor impact to the reputation of the business within a smaller community or local area.	Detrimental impact to a wider community or region. Impact to relations with clients or third parties.	Detrimental impact on a national scale resulting in wide scale loss of confidence.	Severe detrimental impact on a national or international scale. Widespread loss of confidence with the the business brand.

Risk Likelihood Scorings

In addition to measuring the impact of organisational risks, Eversheds Sutherland utilise a 'likelihood' score to determine the possibility of the risk occurring based on the current controls or scenario of the organisation. This is also measured on a 0-5 scale.

Definitions of how these values have been assigned to organisational scenarios are detailed below:

Likelihood score	Descriptor	Frequency
1	Rare	How often might it/does it happen
2	Unlikely	This will probably never happen/ recur
3	Possible	Do not expect it to happen/ recur but it is possible it may do so
4	Likely	Might happen/ recur occasionally
5	Almost certain	Will probably happen/ recur but it is not a persisting issue in circumstances
		Will undoubtedly happen/ recur, possibly frequently

EXAMPLE

4. Dashboard Results

The following reporting has been created using the risk data generated across the entire assessment scope. Creating reports at this level enables Eversheds Sutherland to make observations at an organisational level, understanding key areas within the business where remediation efforts should be prioritised or where commonalities of risk can be addressed.

Assessment Scope Averages

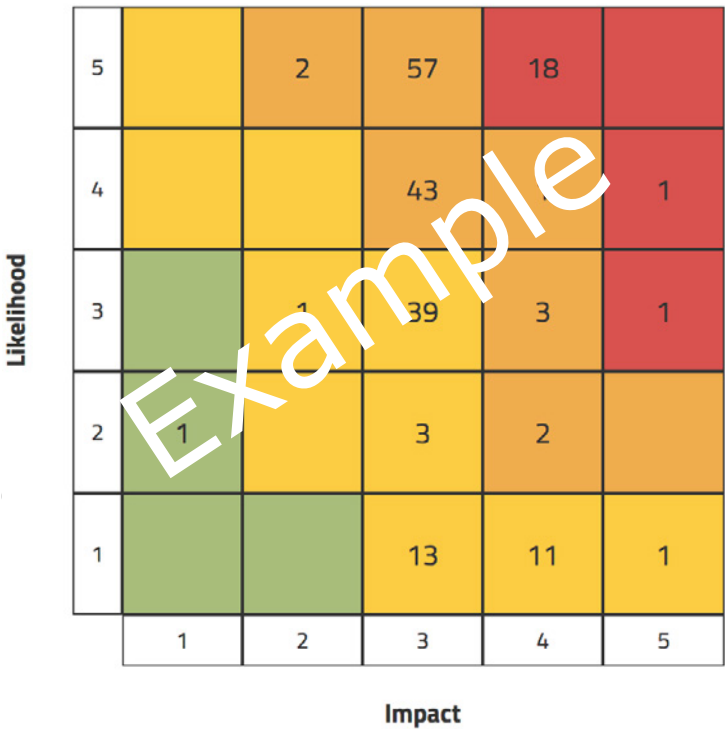
The data below summarises the average risk score, likelihood, and overall impact across the entirety of the assessment scope. As detailed within the above 'Risk Calculations' section, Average Risk Score is measured on a 0-25 scale, and Average Likelihood and Impact are each measured on a 0-5 scale.



[Summary Text] The average risk score of the organisation is currently determined as 11.52, which is a **High Severity** rating. An average likelihood score of 3.84 indicates that controls to mitigate the organisational risks are consistently insufficient, triggering at a near 'Likely' occurrence of the risk occurring or being exposed.

Risk Heatmap

The Risk Heatmap shows where the highest number of individual risks features within the Likelihood vs Impact Risk Matrix. Organisations should prioritise addressing risks present within the upper right area of the heatmap, as this indicates where the highest impact organisational risks also have the highest likelihood of occurring.



[Summary Text] A total of 20 risks have been identified as 'Critical' to the business. There are 18 risks with an impact rating of 4, which have been issued with an 'Almost Certain' likelihood of occurring.

There are also an additional 2 risks with an Impact Rating of 5, which have 'Likely' and 'Possible' chance of occurring.

EXAMPLE

Organisational Summary

The organisational unit summary details the number of risks, total risk score, and average risk score across the assessment scope.

Name	Number of risks	Total risk score	Average risk score
■ Acme Inc	121	1416	12
■ ACME Third Party	55	656	12
■ Third Party 6	18	212	12
■ Third Party 2		15	15
■ Third Party 3	1	12	12
■ Third Party 4	1	8	8

Providing this data in order of risk score, provides the organisation with key organisation units where remediation efforts should be prioritised. It should also be noted that where a small number of risks are shown associated to a business unit, and a high average or total risk score is present, there is likely to be a high-risk score associated to individual risks which could be 'quick wins' for remediation exercises.

[Summary Text] Acme Inc is responsible for a significantly higher number of risks across the assessment scope. An average risk score of 12 indicates that these may be commonly 'High' severity and that there is considerable work to be done in resolving risks and reducing these down to a level which is viewed as 'Acceptable' by the organisation.

Risk Commonalities

Identifying commonalities of risk across the assessment scope can provide huge value in reducing risk across a larger scale. Targeted awareness/educational packs of information that can easily be distributed to all organisational units can help business units reduce risk internally while external remediation efforts are focused on the 'high risk' organisational areas.

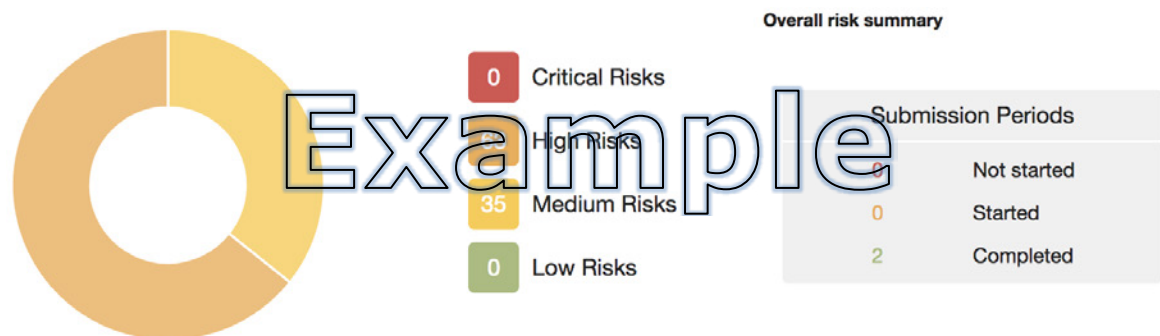
Name	Number of risks	Total risk score	Average risk score
ABMS - 2.1 - Adopting an anti-bribery policy and implementing the ABMS	23	213	9
ABMS - 2.2 - top management statement	1	18	12
Technical control capabilities to enforce tenant data retention	2	24	12
Formal cryptography policy	2	36	18
GDPR - Data controllers	2	28	14
GDPR - International	2	40	20
GDPR - DPO	2	24	12
GDPR - DP by Design and DPIAs	2	28	14

[Summary Text] Anti-Bribery and Modern Slavery risks were most commonly identified across 23 different business units, indicating an immaturity in processes/controls to mitigate this type of risk.

EXAMPLE

5. Assessment Risk Register

The below risk register is an export of all risks generated as a result of the assessment, organised by criticality. Each risk shown has a unique Risk ID for internal reference and to identify the risk details within the platform, the risk severity (including total score), the description of the risk and current organisational status, and the status of the risk. Tracking at what stage in the remediation workflow a risk is at.



Risk ID	Score	Risk Description	Risk Scenario	Risk Register	Status	
125	12 - High	No or Insufficiently Managed Information Security Policy Information Security	Selected options: Our Information Security policy is reviewed on at least an annual basis	Information Security Risk Register	Open	3
129	12 - High	No or Insufficient Consideration of Special Interest Groups Information Security	Selected options: We formally review our special interest groups on at least an annual basis	Information Security Risk Register	Open	0
136	9 - Medium	No or Insufficient Process for Constituents to Review and Accept Policies & Requirements Information Security	Selected options: Constituents are required to review Non-Disclosure or Confidentiality agreements on at least an annual basis	Information Security Risk Register	Open	0
137	15 - High	No or Insufficient Security Awareness Training Programmes Information Security	Selected options: None of the above	Information Security Risk Register	Open	0

EXAMPLE

141	9 - Medium	No or Insufficient Process to Manage Hardware/Software Assets Information Security	Selected options: Our inventory of hardware/software assets is owned by a specific resource or team	Information Security Risk Register	Open	0
142	3 - Medium	No or Insufficient Asset Management Programme Information Security	Yes, our Asset Management programme is reviewed on at least an annual basis	Information Security Risk Register	Open	0
143	9 - Medium	No or Insufficient Accountability for Information Assets Information Security	Selected options: Our assets handled by the business are reviewed and accounted for on at least an annual basis	Information Security Risk Register	Open	0
144	9 - Medium	No or Insufficient Acceptable Use Policy for the Use of Assets Information Security	Selected options: An Acceptable Use policy is in place and reviewed on at least an annual basis; An Acceptable Use policy is communicated to all relevant users	Information Security Risk Register	Open	0
145	9 - Medium	No or Insufficient Asset Return Policy Information Security	Selected options: Our Asset Return policy or procedure includes formal processes for changes, migrations and leavers to return assets	Information Security Risk Register	Open	0
146	9 - Medium	No or Insufficient Classification Policy Information Security	Selected options: An Information Classification policy is in place and reviewed on at least an annual basis; Our Information Classification policy is supported by processes for handling and transmission	Information Security Risk Register	Open	0
147	9 - Medium	No or Insufficient Security Labelling Process Information Security	Selected options: Our userbase is made aware of the Information Security Labelling process upon employment and on at least an annual basis; Conformity of our users against the Information Security Labelling process is audited on at least an annual basis	Information Security Risk Register	Open	0
148	6 - Medium	No or Insufficient Policy to Manage the Handling of Assets Information Security	Selected options: Access restrictions are in place for sensitive or critical assets; Authorised recipients of assets are documented	Information Security Risk Register	Open	0
153	12 - High	No or Insufficient Policy in Place to Manage Access Control Information Security	Selected options: Our Access Control policy is approved by senior management	Information Security Risk Register	Open	0
154	9 - Medium	No or Insufficient Controls to Manage and Monitor Remote Access Information Security	Selected options: Our organisation has remote access in use and is subject to two factor authentication for users connecting to systems or assets containing sensitive information	Information Security Risk Register	Open	0
155	6 - Medium	No or Insufficient Process to Manage Unique User ID's Information Security	Yes, unique IDs are used for all non-administrative functions (not auditable)	Information Security Risk Register	Open	0

EXAMPLE

Example Appendix

Provided responses to support the above assessment and risk data are found below:

No.	Answered by	Question	Answer
1	Emma Lawrence	If your organisation has an Anti-Bribery policy in place, which of the following elements are included?	Our Anti-Bribery policy is reviewed on at least an annual basis
2	Emma Lawrence	If your organisation has a competent Compliance Manager (with access to top management) in place to implement the Anti-Bribery Management System (ABMS) and provide advice and guidance to staff relating to bribery, which of the following elements best describe this?	None of the above
3	Emma Lawrence	Have top management made a statement to staff, and in the public domain, to demonstrate its support for the Anti-Bribery policy?	The Executive Management Team have made a statement to staff The Executive Management Team have made a statement to the public domain
4	Emma Lawrence	Has education, training or guidance been provided to all staff associated with the Anti-Bribery policy in relation to avoiding bribery?	None of the above
5	Emma Lawrence	Have responsibilities for overseeing compliance with the Anti-Bribery policy on a day-to-day basis been established?	Day-to-day responsibilities have been defined Responsibilities are reviewed on at least an annual basis
6	Emma Lawrence	Are there established bribery risk assessment procedures?	Formal bribery risk assessment procedures have been documented Bribery risk assessment procedures are reviewed on at least an annual basis
7	Emma Lawrence	Is there evidence of risk assessment controls to reduce risks to an acceptable level?	Risk reduction over time is demonstrable Acceptable thresholds are defined
8	Emma Lawrence	If your organisation comprises of more than one independently managed component organisation, are there competent managers appointed in each component organisation to oversee compliance with the Anti-Bribery policy?	None of the above

Confidential and privileged

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