

Establishment of a Compliance Management



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Compliance is focus on staff members

Please, add the correct signs to make the equation reasonable:

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Success = Integrity * Energy + Intelligence)

Integrity is key for successful compliance



Success = Integrity * (Energy + Intelligence)

„In looking for people to hire you look for three qualities:
integrity, energy and intelligence.

And if they don't have the first, the other two will kill you.”

(Warren Buffett)

Compliance Management needs sound implementation

The Compliance Management System

- Ensures integrity and law-abiding behavior
- Avoids sentences and economic damage
- Requests transparency and open dialogue
- Compliance Management System encloses guidelines:
 - Corporate mission
 - Code of conduct
 - Leadership principles
 - Environmental core values
- The “Tone from the Top” is essential

- Establishment of an independent Compliance Officer
- Introduction of a Whistleblower System based on the principles:
 - Confidentiality
 - Anonymity
 - Voluntary participation
- The Compliance Officer
 - Checks relevance
 - Starts investigations
 - Coordinates measures internally and externally
 - Correctly terminates the cases
 - Deletes data of personal nature

- Elaborates the scope and core topics for training
- Designs trainings contents focussed on tasks of departments
- Includes management in the training
- Elaborates practical cases for better understanding
- Advises departments on treatment of special issues (procurement, sales, technical projects, etc.)

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- Data protection and confidentiality
 - Customer care
 - Fair relationship towards the customer
 - Equal treatment of customers and suppliers in monopoly to ensure a fair competition
 - Fast reaction on customer needs
 - Advise to apply the environmental, economic and technical optimum considering the legal framework
 - Capital market and investors (insider information)
 - Business partners and contractors
 - Employees and safety at work
 - Integrity and avoidance of corruption
 - Public attention, society, human rights
 - Sustainability

- Frequent information about external cases, which could also happen in the own company
- Frequent quiz about compliance topics (small cases which occurred internally, etc.)
- Revision of scope according to experience and environment
- Establishment of a reporting system to the top management
- “life-fire exercises” with specialized consulting support

Compliance Management has to be tightly fixed

