OBJECTIVES COMPLIANCE FUNCTION

1. Developing and maintaining DNB’s compliance and integrity policy
2. Raising integrity awareness amongst DNB staff
3. Identifying compliance and integrity risks and advising on how to mitigate these risks
4. Operating DNB’s rules of conduct and monitoring whether or not the rules of conduct are complied with by employees.
DEVELOPING AND MAINTAINING DNB’S COMPLIANCE AND INTEGRITY POLICY

- C&I department not automatically a natural partner for other departments
- Make sure compliance is consulted in significant developments and projects
- Make sure this consultation is integral part of governance procedures.
RAISING THE INTEGRITY AWARENESS AMONGST DNB STAFF
AWARENESS

➢ Ensure good communication previous to workshops

➢ Exemplary role of management is essential
Awareness of integrity issues needs maintenance
INTEGRITY AS A CORPORATE VALUE

This apple will remind us of our core values: respect, customer service, and teamwork.

The apple's core is the part you throw away.

Not always. Sometimes I accidentally eat it.

Maybe the stem can represent our loyalty to the company.
WHAT KIND OF CORPORATE CULTURE IS NECESSARY?

"SWELL! YOU GOT THE MEMO ABOUT OUR NEW BURBERRY CORPORATE CULTURE."
CULTURE-HOUSE

- Responsibility
- Accountability

Spirit of the Law

Balanced Actions
- Openness to discussion
- Leading by example
- Feasibility
- Transparency
- Enforcement

Consistent Actions
THE ROOF = THE AIM

Responsibility and accountability
THE SUPPORTING BEAM = THE SPIRIT OF THE LAW
THE OUTER WALLS = DECISION MAKING

balanced and consistent actions
FIVE FOUNDATIONS

- Openness to discussion
- Leading by example
- Feasibility
- Transparency
- Enforcement
IDENTIFYING C&I RISKS AND ADVISING ON HOW TO MITIGATE THESE RISKS

Risk self assessment are less time consuming but also less effective in this stage of the compliance function
RISK ANALYSES

Divisions

DNB
Horizontal
Risks
OPERATING DNB’S RULES OF CONDUCT AND MONITORING COMPLIANCE

Fast response is essential
WHAT IS YOUR EXPERIENCE WITH C&I UP TO NOW?