

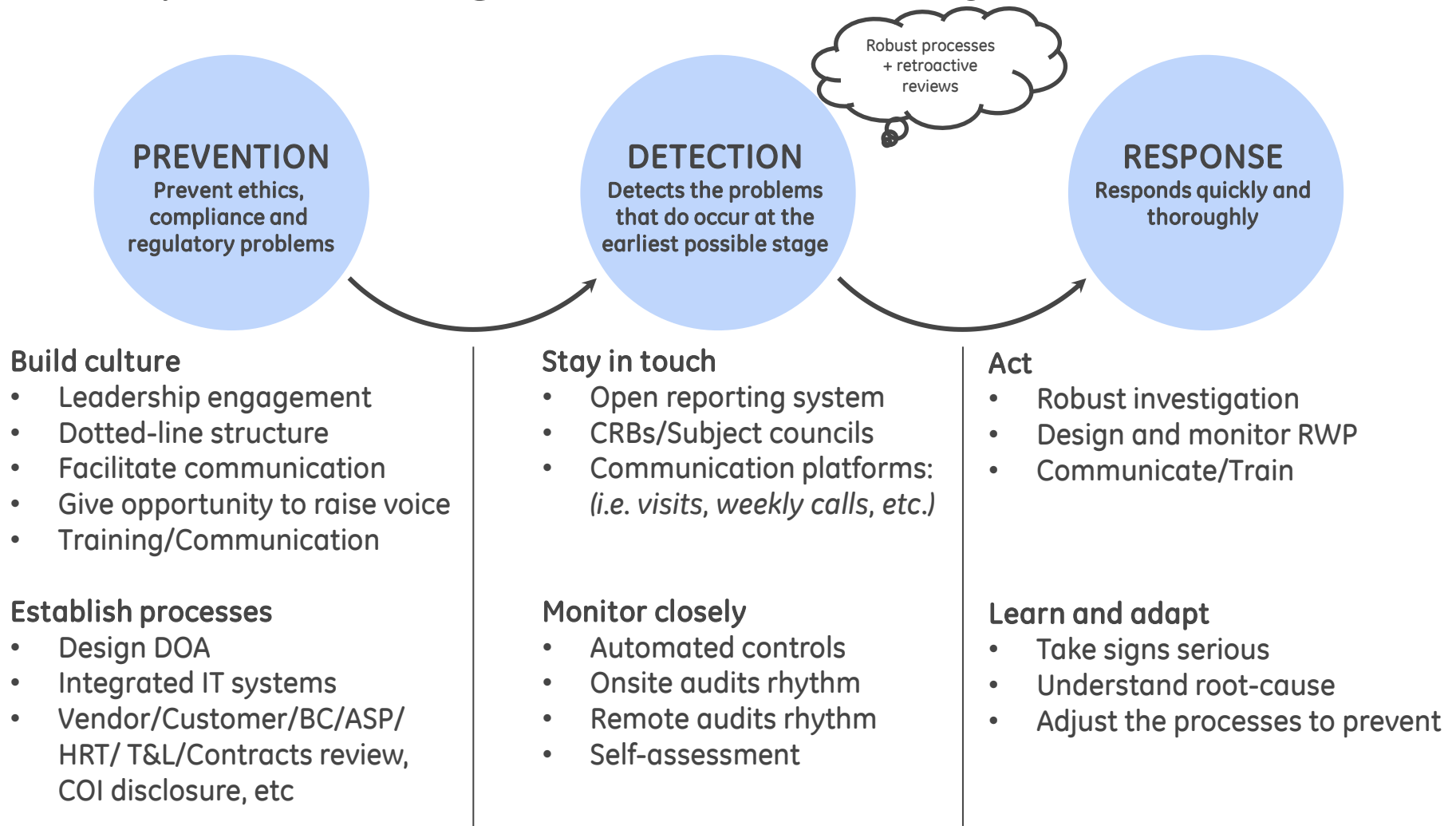


Compliance Controls. Remote office

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Imagination at work.

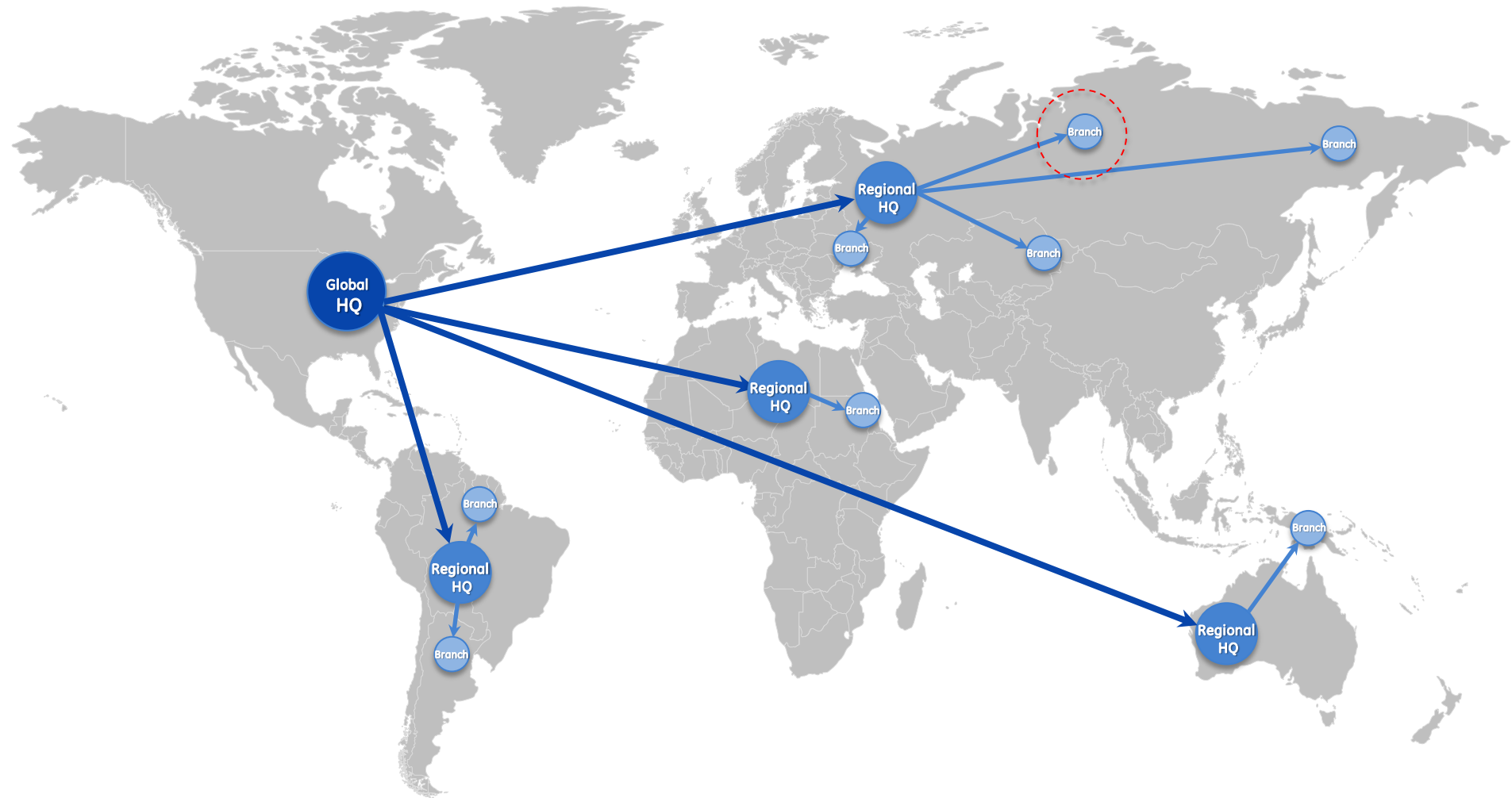
Compliance Program Common Objectives



... provide proactive support... be engaged...



Pivot your mindset



Consider you are the remote office. What makes your HQ feel comfortable about compliance?



Understand Landscape and Adapt Strategy

Location

City



Town



Village



- Culture
- Infrastructure
- Authorities
- Labor market
- Suppliers

Activity

Manufacturing



Office



Warehouse



- Culture
- Regulation
- Reporting
- Processes/Risks
- Suppliers

Population

Big team



Small team



Group



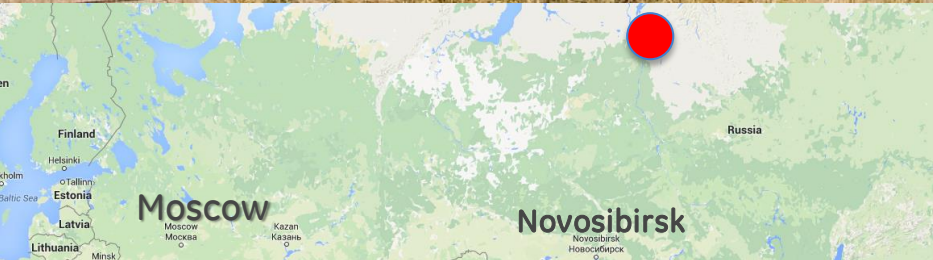
- Culture
- Team environment
- Access to others
- OR opportunities

... all supported by region specific risks and known business practices...



Congratulations! You are CCO for Turukhansk

Unfortunately, it's for 1 week only...



Location: 1500km north to Krasnoyarsk
How to get: water(navigation period) / air
Population: approx. 4500
Climate: min -57C ... max +35,5C



Compliance Program. Prevention



Build culture

- Leadership engagement
- Dotted-line structure
- Facilitate communication
- Give opportunity to raise voice
- Training/Communication

Establish processes

- Design DOA
- Integrated IT systems
- Vendor/Customer/BC/ASP/HRT/ T&L/Contracts review, COI disclosure, etc

Notes:

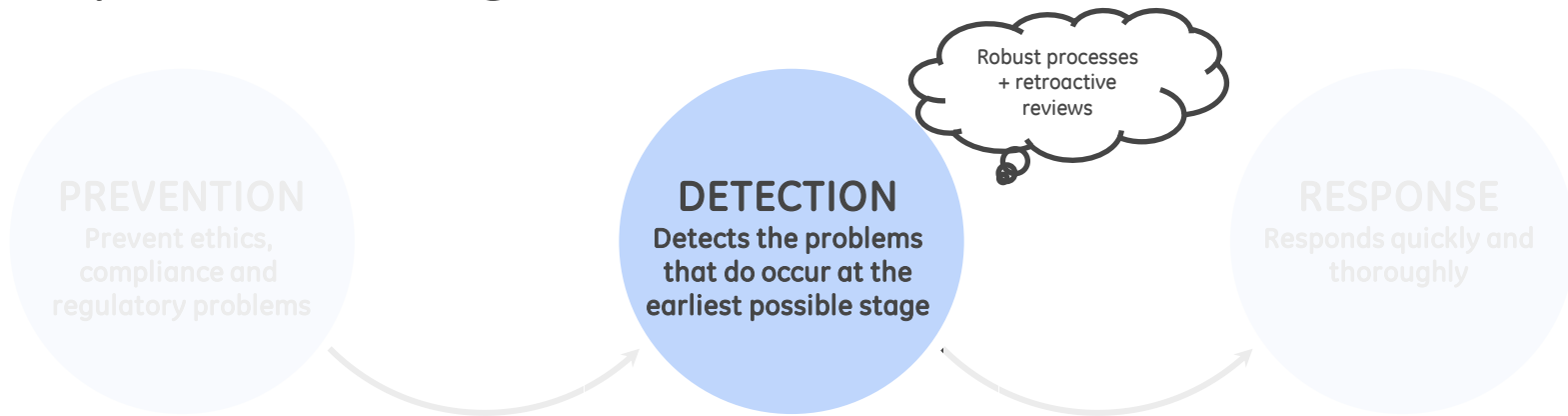
*Leader is a compliance ambassador ... consider internal person
Cross-team communication promotes culture. Network
Communication with HQ sets examples, shares practices
Create variety of channels ... consider barriers
Use any opportunity for Live training. Be accessible*

*Keep critical/high risk decisions with function in HQ
Engineer alternatives to ensure systems can be accessed
Keep HQ hosting the processes*

... provide proactive support... be engaged...



Compliance Program. Detection



Stay in touch

- Open reporting system
- CRBs/Subject councils
- Communication platforms: (i.e. visits, weekly calls, etc.)

Monitor closely

- Automated controls
- Onsite audits rhythm
- Remote audits rhythm
- Self-assessment

Notes:

Create variety of channels ... consider barriers
Keep the rhythm
Use any opportunity to touch the base

Ensure enterprise processes and tools are utilized. HQ approval
Have an audit plan and stick to it
Use remote audits to identify potential gaps and act

... provide proactive support... be engaged...



Compliance Program. Response



Act

- Robust investigation
- Design and monitor RWP
- Communicate/Train

Learn and adapt

- Take signs serious
- Understand root-cause
- Adjust the processes to prevent

Notes:

*Have a deeper look where possible
Identify area of improvement and ensure implementation
Communicate, what was inappropriate, and consequences*

*... you might not have the full picture
... it might go beyond single process or one individual's failure
... keep in mind: "culture is the safeguard when processes fail"*

... provide proactive support... be engaged...

