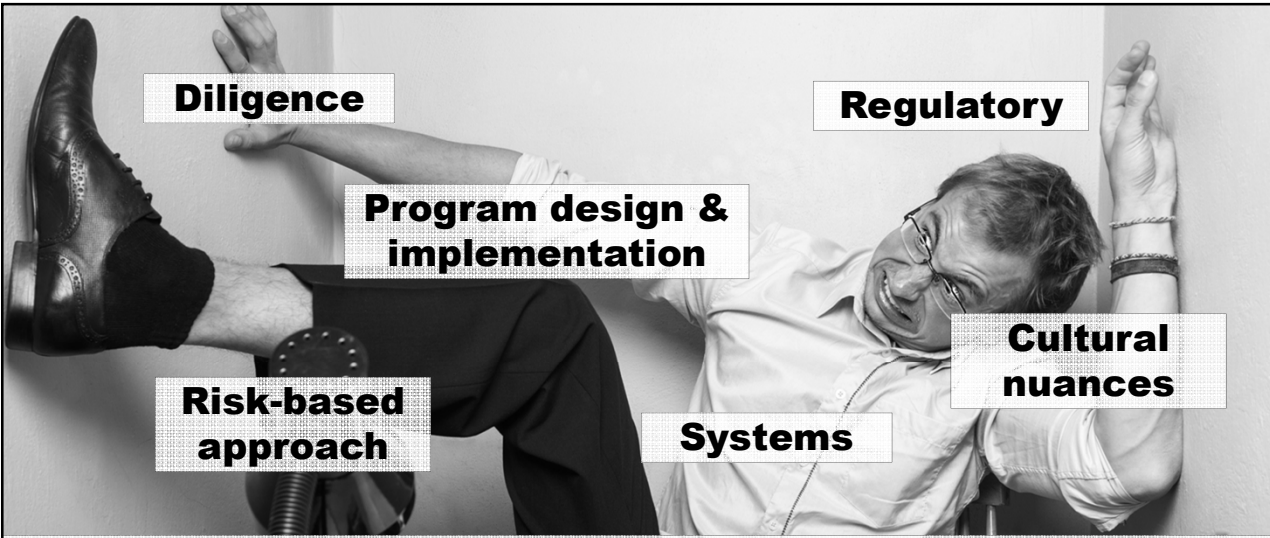




# **MANAGING THIRD PARTY COMPLIANCE PROGRAMS ON A GLOBAL SCALE**

 blue umbrella

Allan Matheson, CEO  
Blue Umbrella



**Diligence**

**Regulatory**

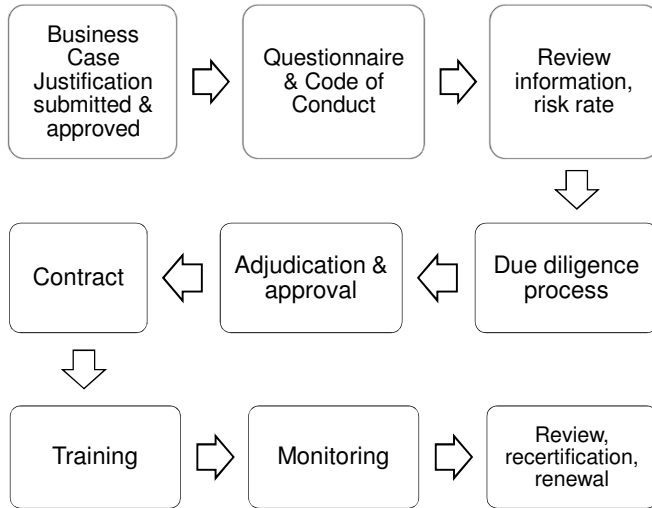
**Program design & implementation**

**Cultural nuances**

**Risk-based approach**

**Systems**

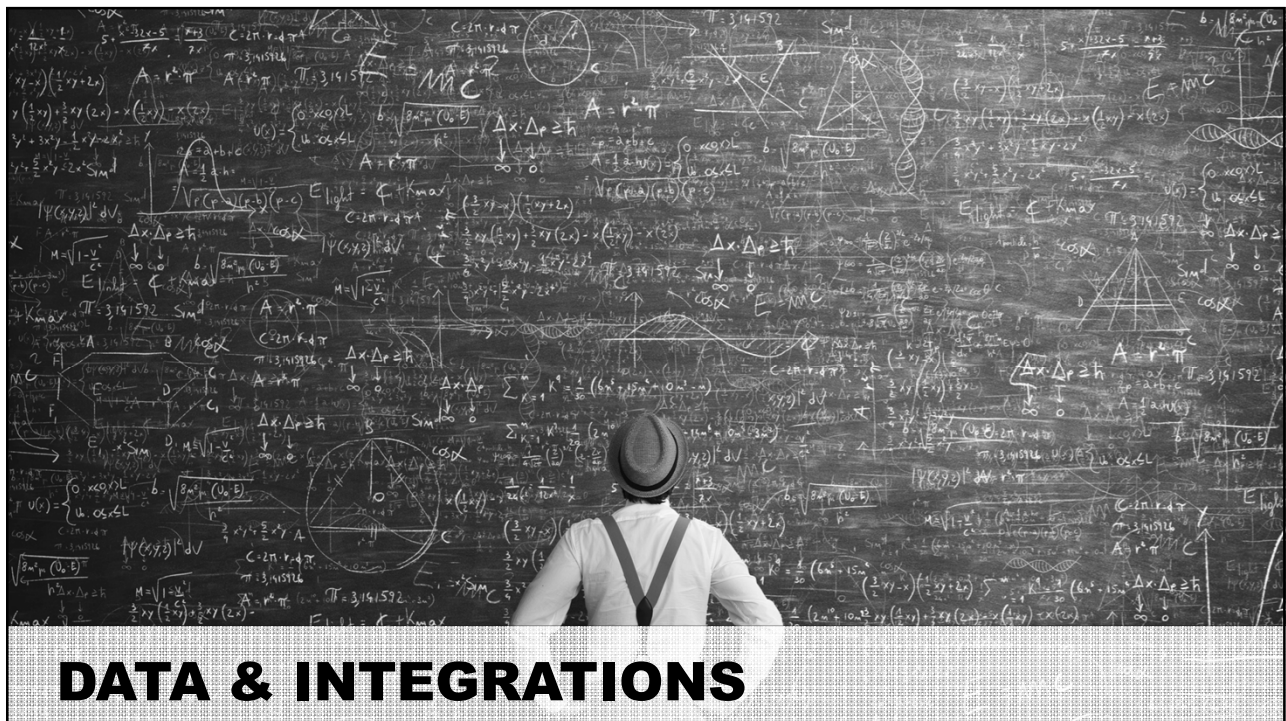
## **COMMON CHALLENGES?**



## A TYPICAL WORKFLOW



## 1. PROGRAM DESIGN & IMPLEMENTATION









### **3. CULTURAL NUANCES**



### **4. RISK BASED APPROACH**



# SCOPE – MEDIA CHECKS

Media Example	Search Type	Results	Source(s)
State Ownership	Full local language media & internet search	Y-Fund Management is 20% owned by DID Investment Company, a state-owned enterprise under the Economic and Information Technology Committee.	Retrieved Feb 7 2018: <a href="#">DLYFund</a> Retrieved Feb 7 2018: <a href="#">Dalian Economic and Information Commission (SME Bureau)</a>
	Media Database	No findings in brand name database	
Media Example	Search Type	Results	Source(s)
Alleged transfer of benefits	Full local language media & internet search	The China Securities Regulatory Commission therefore demanded XW Pharmaceutical Co., Ltd. to disclose the transactions between SPLCMA Co., Ltd. and XW Pharmaceutical Co., Ltd.'s clients and suppliers in details, including the transaction background, the amounts, and the balance involved.	Dated Oct 17 2017: <a href="#">China Securities Regulatory Commission</a>
	English Language Derogatory Media	English media has no relevant finding	
Media Example	Search Type	Results	Source(s)
Embezzlement by former senior managers	Full local language media & internet search	A Sina (新浪) article dated 5 March 2010 reported that three former senior managers of J Mining embezzled from SXEP Co., Ltd.. Zoo Loo, a former Chairman, was sentenced to 18 years' imprisonment with reprieve and had property worth CNY 1 million (approximately USD 145,234.90) confiscated by the Higher People's Court in December 2009 for embezzlement and falsifying capital contribution. Zoo Boo, a former Vice President, was sentenced to 16 years' imprisonment with reprieve and had property of CNY 500,000 (approximately USD 72,617.45) confiscated for embezzlement and falsifying capital contribution. Loo Zoo, a former Vice Chairman, was sentenced to one year's imprisonment with a two-year reprieve and had illicit gains confiscated for falsifying capital contribution.	Dated Mar 5 2010: <a href="#">Sina Finance</a>
	Media Database & English Language Derogatory Media	Publicly listed company - derogatory findings only available in local language	

# SCOPE – MEDIA CHECKS

大连育龙中小企业发展基金管理有限公司

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公司简介

大连育龙中小企业发展基金管理有限公司成立于2015年6月，是大连育龙中小企业发展基金的管理人。公司注册资本2亿元。目前已全部实缴到位。各股东出资情况如下：

序号	股东名称	实缴出资比例
1	大连长源物流有限公司	51%
2	大连市工业发展投资有限公司	20%
3	深圳中新佳成资产管理咨询有限公司	10%
4	大连海昌集团有限公司	10%
5	大连康南堂堂开发有限公司	9%
	合计	100%

**State Ownership**  
Y-Fund Management is 20% owned by DID Investment Company, a state-owned enterprise under the Economic and Information Technology Committee.

# SCOPE – MEDIA CHECKS



## 湖北威尔曼制药股份有限公司首次公开发行股票申请文件反馈意见

中国证监会 www.csrc.gov.cn 时间: 2017-10-17 来源:

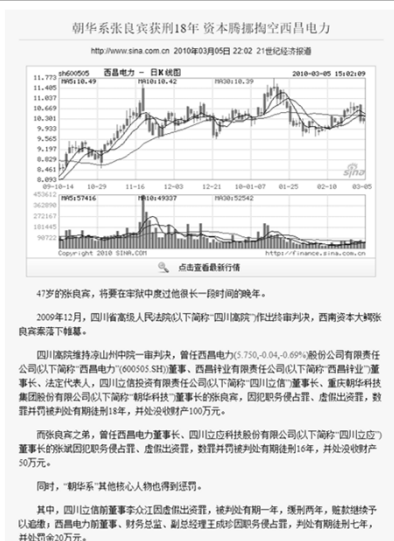
湖北威尔曼制药股份有限公司首次公开发行股票申请文件反馈意见, 具体见附件。

[湖北威尔曼制药股份有限公司首次公开发行股票申请文件反馈意见.doc](#)

## Alleged transfer of benefits

The China Securities Regulatory Commission therefore demanded XW Pharmaceutical Co., Ltd. to disclose the transactions between SPLCMA Co., Ltd. and XW Pharmaceutical Co., Ltd.'s clients and suppliers in details, including the transaction background, the amounts, and the balance involved.<sup>2</sup>

# SCOPE – MEDIA CHECKS



## Embezzlement by former senior managers

A Sina (新浪) article dated 5 March 2010 reported that three former senior managers of J Mining embezzled from SXEP Co., Ltd.. Zoo Loo, a former Chairman, was sentenced to 18 years' imprisonment with reprieve and had property worth CNY 1 million (approximately USD 145,234.90) confiscated by the Higher People's Court in December 2009 for embezzlement and falsifying capital contribution.<sup>8</sup> Zoo Boo, a former Vice President, was sentenced to 16 years' imprisonment with reprieve and had property of CNY 500,000 (approximately USD 72,617.45) confiscated for embezzlement and falsifying capital contribution. Loo Zoo, a former Vice Chairman, was sentenced to one year's imprisonment with a two-year reprieve and had illicit gains confiscated for falsifying capital contribution.



Sam Tsang/SCMP

## **SCOPE – LITIGATION**



## **CONCLUSION**





## QUESTIONS?



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