



COMPLIANCE APPLICATION: Why, When & How

SCCE Dubai

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mubadala.com



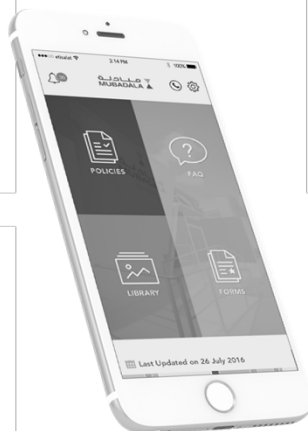
Why?



WHY AN ETHICS & COMPLIANCE APPLICATION...

Millennials

- The number of hours we spend on our mobile phones
- Everything is being digitized. Everything is an Application
- It's a way to reach millennials and to evolve as a function



Ease of Accessibility

- Forms at your fingertips
- Allows ethics & compliance disclosure forms to be submitted via mobile device
- Upload relevant pictures to disclosure forms
- Contains key contact details

Policy Summaries

- Requires you to condense your Code of Conduct into its palpable points
- Contains policy briefs on relevant ethics & compliance policies
- Make your points and references digestible—"bite size"

Push Notifications

- Allows the Ethics & Compliance Office to push notifications to a wider audience
- FAQ section addresses common questions related to policies and disclosures
- Flow charts to deal with commonly encountered issues

When?



WHEN YOUR PROGRAM IS SOPHISTICATED ENOUGH ...



Code of conduct is launched (internally and externally)



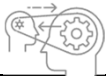
Policy structure is in place



Policies have been launched and trained



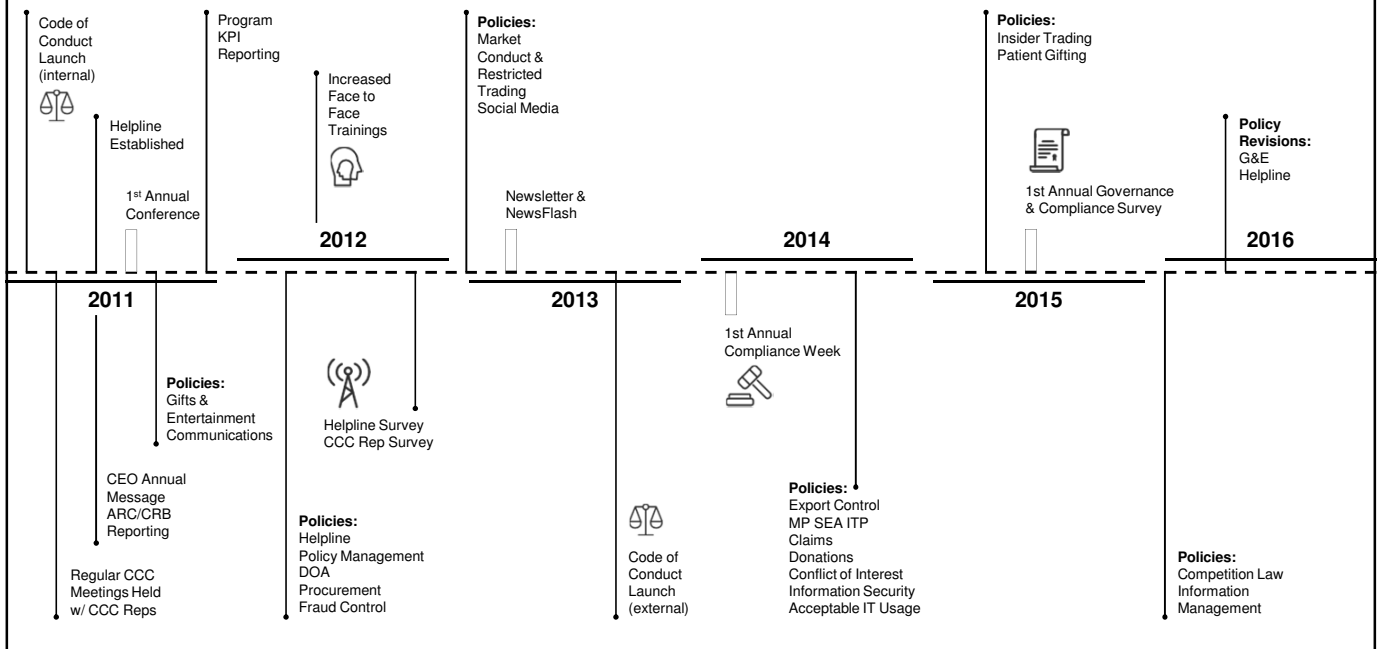
Forms are ready & socialized



Staff to respond & address queries



OUR JOURNEY



How?




MUBADALA

HOW: LESSONS LEARNED

Have a Launch Plan

1

PLAN

Determine How To Maximize Application Downloads

2



MAXIMIZE

Make the Content Engaging

3



ENGAGE

Reassure Everyone that It Is Not a Surveillance Application

4



REASSURANCE

Continue to Update Application

5



UPDATE

Push Notifications, Quizzes, Etc. Are Key

6

EXTRAS

HOW: THE LOGISTICS



HIRE A DEVELOPER

If there is no in house expertise, hire someone who specializes in developing applications that are content heavy

Work with the developer to have a clean, structured layout



CUSTOMIZE CONTENT

Develop unique content

Whether it's a newsletter or quiz or push notification, have content that is not available elsewhere and tailored to the application



EMBED WORKFLOWS

FAQ are not enough

Embed workflows that anticipate your employees' questions and give them the answers

Do this for all major topics including Conflicts of Interest and Gift & Entertainment

(See Examples)

USE OF CONFIDENTIAL INFORMATION AND MUBADALA GROUP RESOURCES

FACTS

Hamdan, an employee at the Mubadala Group, is sharing policies and procedures with a new government entity. He is also assisting them on the weekends and using his expertise to guide them through the policy implementation process

IS THERE A CONFLICT?

Yes, there is a conflict because Hamdan is sharing confidential information which belongs to the Mubadala Group for which he has not sought permission to share

WHAT SHOULD HAMDAN DO?

- Hamdan should not disclose, use, or share any Mubadala Group confidential information outside of his role with Mubadala
- Hamdan should confirm the information he intends on sharing is reviewed and approved by the Ethics & Compliance Office prior to it being shared
- Hamdan should abide by the Information Management policy
- Hamdan should attend the Information Management training conducted by the Ethics & Compliance Office
- Hamdan should submit a Conflict of Interest disclosure for review so the potential conflict can be properly managed

GIFTS, ENTERTAINMENT, SPONSORSHIPS, AND HONORARIA

FACTS

Mona, a Mubadala Group employee, organized a meeting with a potential supplier. The CEO of the potential supplier gave a Montblanc pen to Mona in front of a number of people from both companies as a thank you for her contribution in arranging the meeting

IS THERE A CONFLICT?

Yes, this could be a conflict as this could be perceived as a bribe to influence business discussions with the Mubadala Group

WHAT SHOULD MONA DO?

- Mona should respectfully decline the Montblanc pen from the potential supplier
- Mona should disclose this interaction with her business leader



Thank you