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Detecting Thunder Before the Storm :

Effective Antifraud, Compliance, and Ethics functions

Effectiveness

- ✓ **Effectiveness** is getting the job done
- ✓ **Effectiveness** is the capability of producing a desired result
- ✓ The level of quality with which a task or process is carried out that ultimately leads to higher overall **business** performance

KEY STRATEGIC PARTNERSHIPS



COMPLIANCE
AND ETHICS



INTERNAL
AUDIT



EXTERNAL
AUDIT



ERM



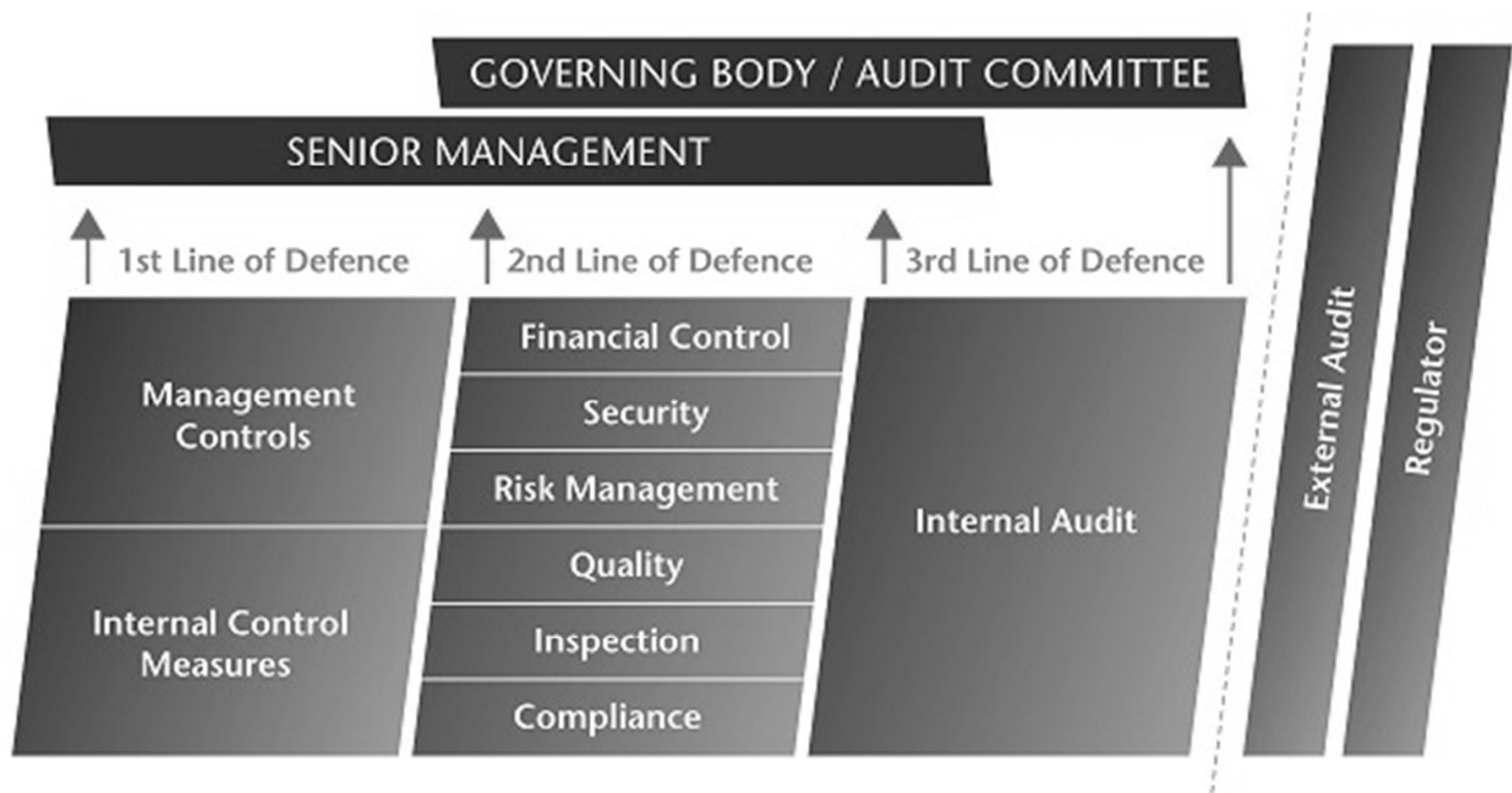
REGULATORS



INFORMATION
SECURITY



OTHER
PARTNERS



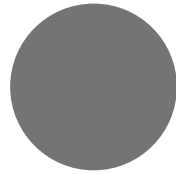
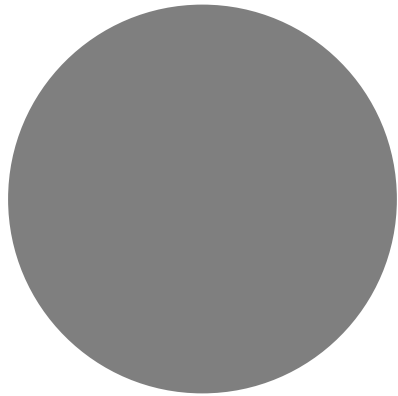
Integration and
collaboration between
Internal audit, Fraud,
Compliance and ethics
function

3 Ways for Integration



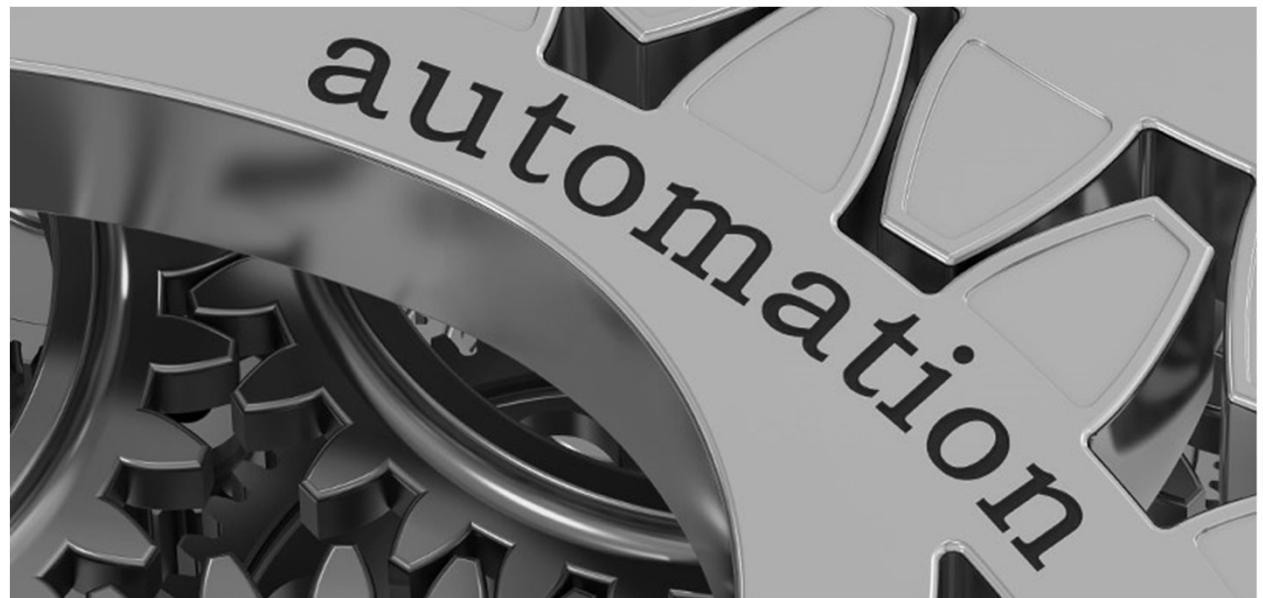


Holistic View



Enterprise Engagement and Collaboration

Optimized
with
Automation





What risks will each partner be responsible for monitoring and/or owning?



Will they be functioning independently and objectively?



What are the reporting responsibilities?



Can this structure maintain the necessary lines of separation?



How will the changes be communicated to impacted stakeholders

DEVELOPING PROGRAM

Understand

Understand the expectations of the company and practice them every day



Recognize

Recognize unacceptable behavior and encourage that action be taken



Prioritize

Prioritize fraud risks and determine those risks that warrant attention



Install

Install controls to mitigate identified risks or suspected fraud risks



Formulate

Formulate actions to take once fraud is detected



Ensure

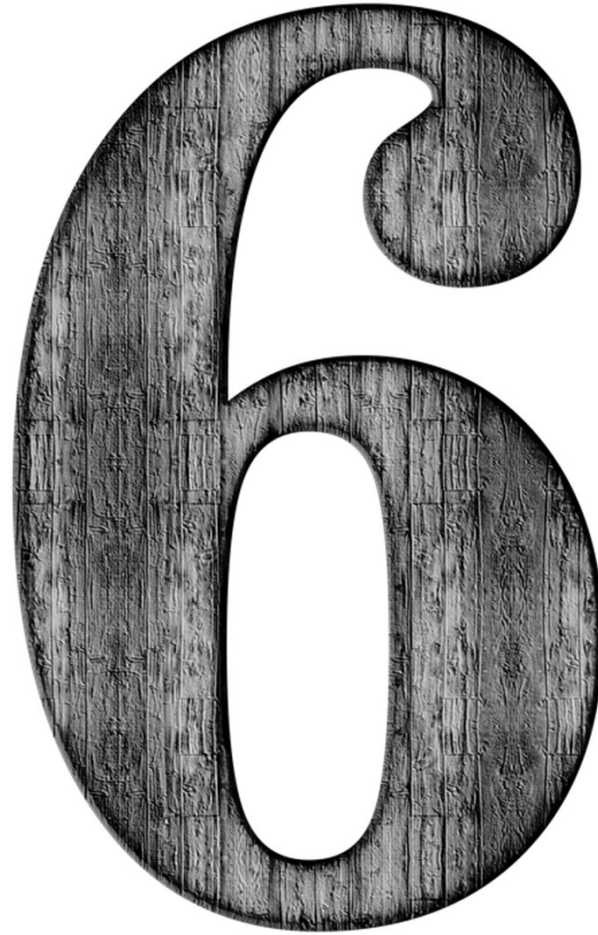
Ensure that these actions are followed if an investigation begins



Share

Share leading practices across business functions and segments

Key ELEMENTS
OF
AN “EFFECTIVE”
PROGRAM



Tone at the
TOP



Code of
Ethics and
Anti-Fraud
Policies



Vehicles for
Reporting
Suspected
Misconduct or
Noncompliance



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Adequate
Risk
Assessment



Standardized
Case
Investigation,
Management,
and Disposition



Evaluation
and
Validation
(Monitoring



A white rectangular card is pinned to a dark, textured corkboard. The card has the words "Thank you" written in a black, cursive script. A single metal pin is visible at the top center of the card.

Thank you