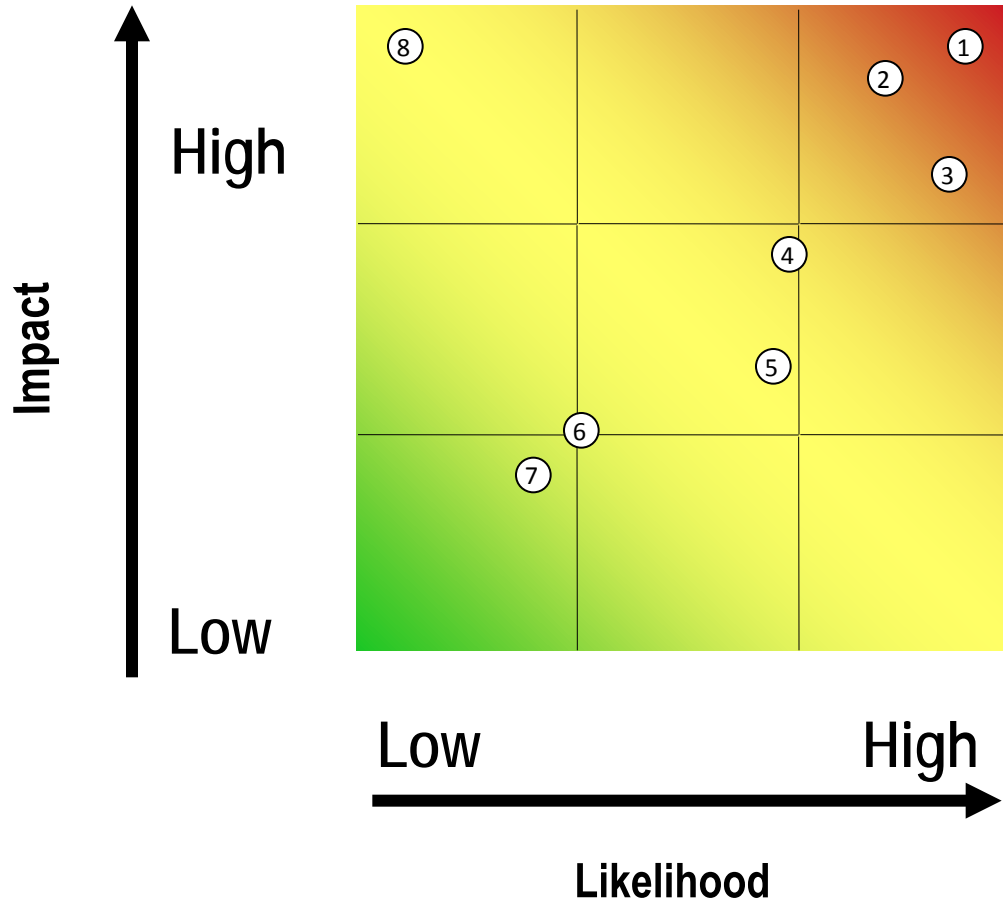


Risk Exercise: *Sample Risk Assessment*

High	CORRUPTION/BRIBERY PRIVACY/DATA PROTECTION CULTURE/TONE
Medium	INCENTIVE PROGRAM CONFLICTS OF INTEREST
Low	RECORDS RETENTION SOCIAL MEDIA ANTITRUST/COMPETITION LAW

Risk Exercise: *Sample Heat Map*



EXAMPLE

- 1 – Corruption/Bribery
- 2 – Privacy/Data Protection
- 3 – Culture/Tone
- 4 – Incentive Program
- 5 – Conflicts of Interest
- 6 – Records Retention
- 7 – Social Media
- 8 – Antitrust/Competition Law

Risk Exercise: *Sample Risk Mitigation*

PRIORITY	RISK/ISSUE	SAMPLE HIGH-LEVEL MITIGATION STRATEGIES
1	CORRUPTION/ BRIBERY	<ul style="list-style-type: none"> ○ Identify industry compliance failures in areas of corruption/bribery and present risks/trends to senior leaders along with mitigation plan ○ Develop/implement policies and procedures for Anti-Corruption/Bribery Program to include Due Diligence practices when engaging with vendors and third-parties ○ Develop and deliver focused training/awareness on anti-corruption/bribery topics throughout the organization to include third-parties ○ Incorporate Company compliance standards into all third-party contracts ○ Establish process for ongoing monitoring and auditing of Program effectiveness
2	PRIVACY/ DATA PROTECTION	<ul style="list-style-type: none"> ○ Engage qualified experts to review and assess full scope of breach and related impact/liabilities; leverage third-party external support ○ Identify systemic root cause of breach; report/disclose as appropriate ○ Establish and implement internal controls to manage/mitigate risk area moving forward (<i>e.g., technology controls, policies, procedures, training, software</i>) ○ Identify/recruit fully qualified internal resource to lead and manage Company risk area; vet qualifications consistent with acceptable standards/best practices
3	CULTURE/ TONE	<ul style="list-style-type: none"> ○ Establish board/leadership training and awareness activities; focus on oversight responsibilities, tone, E&C program effectiveness, etc. ○ Present value proposition and needs for E&C Program; secure adequate resources ○ Conduct a Company-wide culture assessment to understand current state; establish plan/process for ongoing monitoring and assessment activities ○ Develop/integrate a new Code of Conduct to include training of employees at all levels of the organization; facilitate/establish a Company Values Statement

Risk Exercise: *Sample Risk Mitigation*

PRIORITY	RISK/ISSUE	SAMPLE HIGH-LEVEL MITIGATION STRATEGIES
4	COMPANY INCENTIVE PROGRAM	<ul style="list-style-type: none">○ Review/assess current state of Company incentive program to include parties involved in development/management, processes, protocols, launch, communications, and results/metrics to date (<i>payouts, accounts opened, etc.</i>)○ Engage with leadership on related E&C risks and potential likelihood/impact to organization; recommend modifications/changes to existing program○ Implement independent E&C oversight and management protocols and controls to prevent potential wrongdoing and mitigate risk; includes ongoing monitoring○ Ensure E&C participation/input on all Company incentive programs moving forward
5	CONFLICTS OF INTEREST	<ul style="list-style-type: none">○ Inventory existing (<i>potential</i>) COI issues and create mitigation plans○ Establish policies and procedures for addressing and managing conflicts of interest to include proper reporting channels, review, waivers, etc.○ Develop/implement a process for ongoing COI disclosures and related management○ Review global COI policies for cultural considerations and assure consistency with corporate level polices and procedures○ Implement Company-wide training and awareness program focused on COI

Risk Exercise: *Sample Risk Mitigation*

PRIORITY	RISK/ISSUE	SAMPLE HIGH-LEVEL MITIGATION STRATEGIES
6	RECORDS RETENTION	<ul style="list-style-type: none"> ○ Inventory existing policies and procedures by business unit; evaluate consistencies, practices, etc., across the organization ○ Determine if any existing practice or past action has resulted in a violation of law ○ Secure resource(s) to lead/implement a centralized RIM Program and infrastructure ○ Establish centralized policies and procedures related to RIM and retention standards ○ Implement/deliver applicable training and awareness across the organization regarding RIM policies, practices, expectations, etc.
7	SOCIAL MEDIA	<ul style="list-style-type: none"> ○ Evaluate existing uses of social media for business purposes to include impact, media sources, use of Company assets, and employees involved ○ Establish Company-wide policy/procedure regarding the use of social media during work hours (<i>both for business and personal purposes</i>); implement policy/procedure ○ Provide Company-wide training/awareness regarding policy, expectations, etc. ○ Establish appropriate technology controls and related risk mitigation efforts
8	ANTITRUST / COMPETITION LAW	<ul style="list-style-type: none"> ○ Engage with leadership; recommend immediate cancellation of upcoming rally ○ Review/investigate history and current state of proposed rally with competitors; includes parties involved, any past meetings, potential wrongdoing, etc. ○ Establish/implement Company-wide policy/procedures regarding direct and indirect interaction/engagement with competitors and related risks ○ Provide targeted and Company-wide training/awareness on antitrust and competition law compliance; target priority audiences