

How to Create a

Robust E&C Program

in 10 Steps

A well-designed ethics and compliance (E&C) program employs policies and procedures (including assignments of responsibility, training, and incentives) to ensure complete integration of E&C principles into the company's operations that are adhered to by leadership and employees alike - setting a clear message that misconduct is not tolerated and will be investigated thoroughly.

Ensure your E&C Program meets the ECI Blue Ribbon Panel Report's 5 principles ☑

These are:

- illese ale.
- StrategyRisk Management
- Culture
- Speaking Up
- Accountability



Mitigate against risks



Go beyond a 'box-ticking' exercise

Your E&C Program should be well designed, adequately resourced, empowered to function effectively, and measurable.





When it comes to identifying risks, allocate time and resources to risk assessment and prevention.





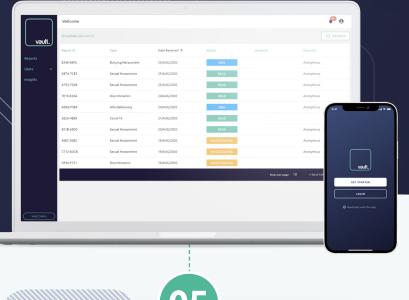
All employees - regardless of location, language, and responsibilities - should be able to easily access and understand company

Tech solutions such as

Vault Platform have employee

apps that make centralizing

policies and procedures easy.



Provide appropriate

E&C professionals, managers, and employees have access to appropriate training, offline

training to all employees

and online, to build awareness of the process for reporting and investigation.



Reporting and Resolution process Adopt a secure reporting channel that ensures the confidentiality of the reporter's

identity, allows you to communicate with

Offer a Robust Incident

them (anonymously if required), and gives you real-time data on the status of ongoing investigations and specific categories of incidents.

Old-fashioned hotlines won't

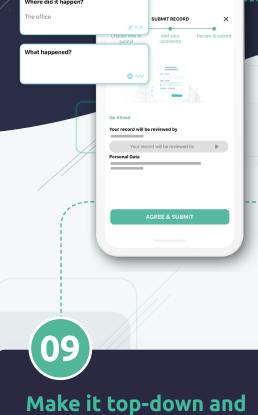
cut it. Tech solutions like Vault

Your reporting solution should also allow third parties and partners to report incidents of misconduct to your organization, as well as

partner reporting

receive follow-up communications.

What time did it happen?



Platform enable anonymous reporting and communication with employees to make closing the loop on investigations easy and trackable.

in case of Mergers and Acquisitions

An effective risk assessment process is carried out during the due diligence process of mergers and acquisitions - multiple compliance programs may need to be

Carry out risk assessments

integrated.

Once the program

Once the program is launched, your organization needs to build trust in the

program to make sure it is adopted top-down and bottom-up (by leadership and rank-and-file employees).



The Board of Directors and other relevant parties have oversight

Consider what experience or training Board members have to ensure adequate capability of oversight.

challenges, regardless of the size of the business.
Any questions about how to get started?

Vault Platform is ready to provide turnkey solutions to E&C