



Dear Participants,

Thank you for attending our session, '**Driving Best Practices in Business Integrity**' on 6 June 2022.

We hope that you found the session informative and insightful. Our primary goal was to bring together compliance practitioners from leading KSA companies to showcase their journey and practices in anti-corruption and business integrity.

Key outcomes from the session:

- Learn more on the business case for anti-corruption and integrity and its impact on business performance.
- Get a deeper understanding of the company's journey, processes and tools used to embed and drive effective integrity culture and practices in their companies
- Connect with likeminded professionals to exchange ideas and experiences

Speakers:

- Jaleel Ghani - General Manager for Corporate Ethics & Compliance
- Baker A Sindi - Sr. Manager, Compliance Programs MEA
- Wasif Muhammad - Chief Risk Compliance Officer
- Camilla Cavanagh - Director with KPMG Lower Gulf specializing in Fraud risk, Governance and Compliance

Key Insights from the session:

stc: Jaleel Ghani - General Manager for Corporate Ethics & Compliance

- Role of corporate and compliance culture within companies is key to business integrity
- Effective corporate and compliance culture leads to higher productivity, profitability, lower attrition, increased trust within the company and overall goodwill. Trust is the most difficult part of culture to bring within the organisation – critical questions to consider are:
 - What kind of decision making exists within the organization?
 - How transparent are our policies and processes?

- What kind of compliance culture do you have in your organisation?
- How do you address the HR issues within your organisation?
- stc launched their compliance programme during the pandemic based on the best practices in the region
- The policy is developed for all members of the organization regardless of their role and hierarchy
- The policy was further shared with each member stating the 'need', 'use' and 'structure' of the policy
- The policy considers 16 integrity risk areas that are grouped into 4 categories –
 - Integrity commitment to our Customers and Communities
 - Integrity commitment in The Marketplace
 - Integrity commitment to our Investors
 - Integrity commitment in the Workplace
- Each policy statement provides guidance to employees when dealing with specific risk areas such as corruption, conflict of interests and outlines stc's expectations from employees in such instances
- Employees are encouraged to use the designated Speak Up channels to report integrity concerns
- The Code also emphasizes stc's zero tolerance for retaliation for raising integrity concerns or participating in a compliance investigation.
- Employees are encouraged to think about these questions while tackling integrity related questions/challenges:
 - Does this violate our code of ethics?
 - Is this against our values and culture?
 - Is this illegal?
 - Would I be uncomfortable if this became public?
 - Could this adversely affect my or the company's reputation?
 - Could this adversely affect our stakeholders?
 - And if you're still unclear, seek help from your manager or the legal affairs team
- The Elements of the Ethics and Compliance program framework include:
 - Training
 - Communication
 - Speak Up
 - Regulatory Excellence
 - Compliance Reviews
 - Program Evaluation
- The frameworks provided are supported by underlying practices, procedures, and other controls and all employees are made aware of this
- Leader's need to walk the talk – therefore it is key that the leaders set the example for integrity and employees take their cues from them
- Emphasis on training is given to ensure all employees are aware and updated. Structure followed by stc:
 - New employee integrity training
 - Basic online integrity training
 - Advance online integrity training
 - Live awareness sessions
 - Employee disclosures

- To ensure the policy and procedures are understood and available to everyone, the communications team at stc develops collateral and ensures all members of the organisation have access to the documents and the document is made available for internal and external stakeholders.

SABIC: Baker A Sindi - Sr. Manager, Compliance Programs MEA

- SABIC built their compliance program over few years adding different elements to the code of ethics and integrity structures
- They initiated the process by developing a code of ethics, training programs and policies and procedures employees need to be aware of further leading to global leadership structures, risk management, integrating an integrity culture and identifying certified business leaders
- SABIC also conducted a survey to address integrity, ethics, and compliance issues in the company with the focus on hierarchy and reporting mechanisms
- The integrity survey is run every 3 years to benchmark and evaluate the business integrity practices followed
- Based on the results from the survey, they further finetuned their business integrity structures, and their Legal-Compliance team enables the business and functions with policies to comply with and tool to use, such as the ethical leader toolkit.

Tamer Group - Wasif Muhammad - Chief Risk Compliance Officer

- Tamer Group shared the practical aspects of the implementation of anti-bribe, corruption and money laundering processes and policies
- They encourage all their stakeholders to share their understanding/thoughts and challenges with the new policies developed
- They further developed a conflict of interest undertaking which is further implemented every year with the C-suite members
- The purpose of engaging C-suite in the company is for information and practices to seep into the programs and teams they manage and the overall culture of the company
- Some of the employees get trained on anti-bribery and corruption on a regular basis and this training is further shared with members of the company and integrated in the culture
- TRACE certification on anti-corruption and bribery has been acquired to ensure ethical practices are followed and communicated
- Whistle blowing policy called Ethics Speak up is set to review complains with critical stakeholders across departments
- Continuous workshops and awareness sessions are conducted to train employees and critical stakeholders, and all related documents are kept updated on a regular basis
- Majority of collections from customers are routed through banking channels thereby largely eliminating any AML complicity risk
- Major business payments are made through banking channels (local and international)
- Counterparty KYC and SOF compliance risk is transferred to the Banks involved
- SOPs for cash collection and handling are implemented and cash collections are reconciled daily
- These practices and documents are continuously updated, and trainings are conducted on a regular basis

KPMG - Camilla Cavanagh -Director with KPMG Lower Gulf specializing in Fraud risk, Governance and Compliance

- Governance is more than an organizational chart at KPMG
- Good governance requires that checks and balances exist at every level to help ensure transparency and objective monitoring of the actions and culture of the organization
- KPMG's code of conduct affirms that it is every individual's responsibility to say something when he/she sees or experiences conduct that is inconsistent with a particular law, regulation, professional standard, or any behaviour that may be incompatible to the KPMG values
- KPMG's code of conduct emphasizes on the company's values, and they drive the daily behaviours, guide decisions, and shape the company's character

The session ended with a power packed panel discussion on ethics, compliance, values, and integrity in business practices followed by companies.