
Assisting you in Mapping Corruption Risks and Implementing Your “Sapin 2” Compliance Programs

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- Experts in criminal risk prevention and management.
- Defense of corporate entities and their directors facing allegations of white-collar crimes.
- All communications are protected by attorney-client privilege.
- A structure specialized in compliance founded in 2014.
- Over **50 comprehensive "Sapin 2" risk maps delivered.**
- 150+ "Sapin" 2 training sessions conducted.
- A suite of tools and templates at your disposal.

Your legal and operational partners
in designing and implementing your "Sapin 2" compliance programs.

01

Distribution of online questionnaires

➤ Comprehensive questionnaires covering about 100 controls and best practices for corruption prevention and detection, and **review of over 40 “aggravating” and “mitigating” risk factors**, to be distributed across the entire group.

02

Interviews with key stakeholders

- CEO
- General Counsel
- Audit & Risk Director
- Procurement Director
- Sales Director
- Quality Director
- CFO
- HR Director
- Division Heads, etc.

03

Review of Group policies and procedures

- Procurement policy and procedures
- Management of expense reports
- Sales policy
- DOA (procurement, recruitment, expense reports, etc.)

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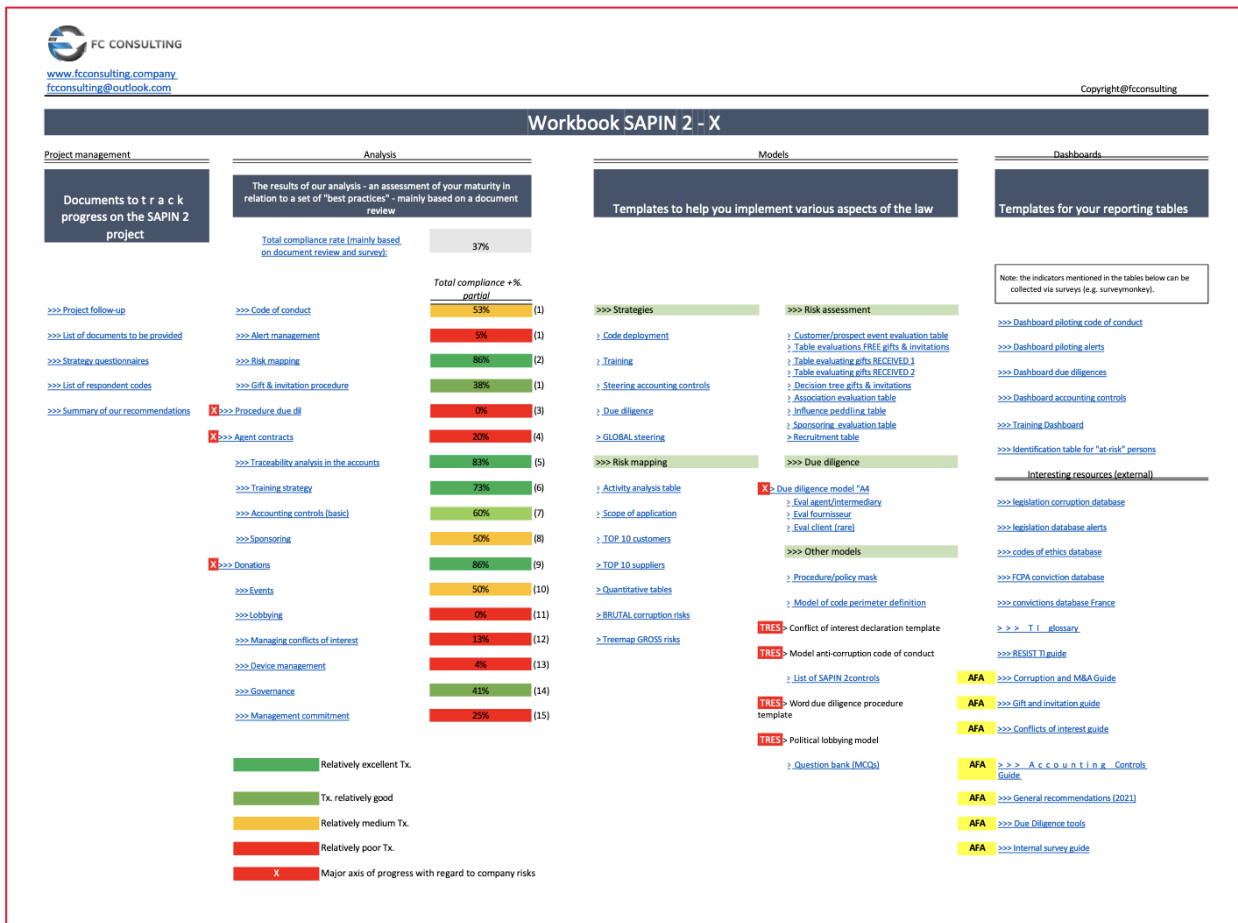
40 risk factors analyzed
(e.g.: economic dependence of suppliers, degree of customer concentration, etc.)

360+ maturity points reviewed

TAILORED MAPPING OF GROSS AND NET CORRUPTION RISKS

A highly operational approach focused on the “aggravating” and “mitigating” factors of corruption risks.

OUR RISK MAPPING ANALYSIS FILE



This file includes:

- Semi-automated analysis tools to assess your compliance maturity (360+ criteria analyzed),
- A risk summary (40 factors analyzed),
- Decision-making support tools,
- Useful links and resources, etc.

Delivered upon completion of the mission, this documentation will empower you to manage your compliance
WITH FULL AUTONOMY!

OUR "SAPIN 2" RISK MAPPING TEMPLATE

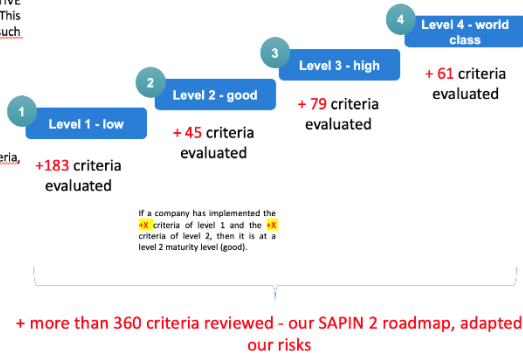
Introduction: presentation of the "SAPIN 2" maturity model in use

Fconsulting has developed a model to assess the RELATIVE maturity of our corruption prevention/detection systems. This model has been built on the basis of various publications such as:

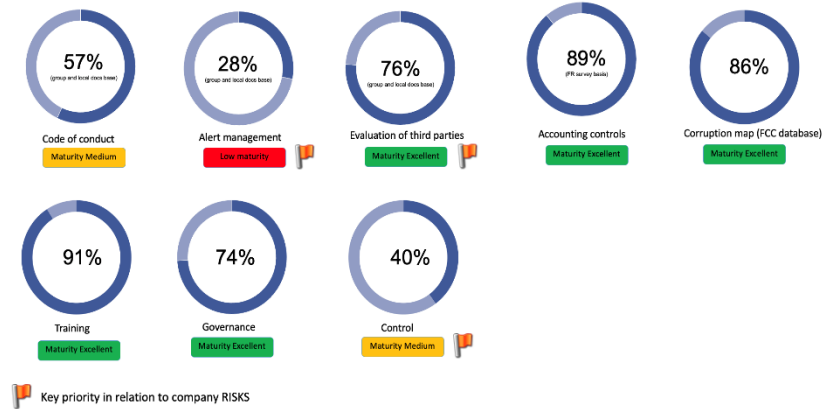
- AFA recommendations,
- The AFEF-MEDEF guide published in October 2017,
- The UK bribery act guidance,
- Guidelines from TI, OECD...

The model used includes more than 360 analyzed criteria, classified around the following main themes:

- Code of conduct
- Alert management
- Risk mapping
- Evaluation of third parties
- Training
- Accounting control
- Gifts and invitations
- Lobbying
- Facilitation payments
- Conflicts of interest
- Governance
- Control
- Management commitment.



SUMMARY OF OUR EVALUATION (% compliance / + 360 criteria)

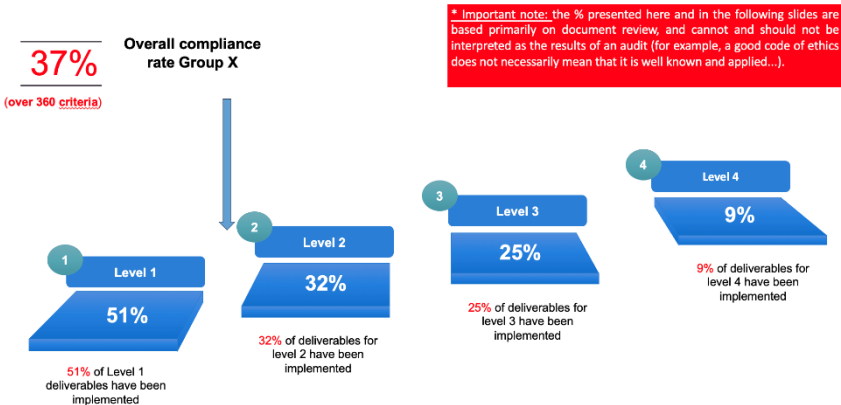


➤ A 50+ page document = your business model broken down through the lens of corruption risk,

➤ A visual, action-oriented document that facilitates decision-making,

➤ A document adopted by over 50 clients.

GLOBAL summary of the results of the maturity of our prevention/detection systems



SIX (here 828)		Industry convictions (or equivalent) for corruption		% of customization of goods and services sold	
Use of agents/business introducers	Existence of manual payments	Lobbying activities	Donations to political parties	Public assistance	Managers from the public sector / doing A/R
Regulatory framework	Access to cash (or cash equivalents)	Customers/CA's located in "high-risk" countries	Existence of "high-risk" financial situation	Degraded financial situation	Production of negative externalities
Possession of "valuable" information	Licenses, permits, etc. required to carry out all or part of the activity (issued)	FREE gifts and hospitality	Sales compensation structure	Disposal process planned or underway	Donations to associations

TOTAL 40 factors analyzed

Risks reviews: 3 (red), 1 (orange), 1 (yellow), 36 (green) Risks low

- **Tailored support for designing and/or bringing into compliance the devices required under the “Sapin 2” Law, based on the delivered risk map:**
 - ✓ **Code of conduct** applicable to all company employees and third-party collaborators wherever the company conducts business activities, including abroad;
 - ✓ **Disciplinary system** to sanction violations of the company’s code of conduct by employees;
 - ✓ Internal **whistleblowing system** to collect reports from staff members about conducts or situations that violate the company’s code of conduct;
 - ✓ **Third-party due diligence procedures** to assess the integrity of third-parties (customers, leading suppliers and intermediaries, etc.);
 - ✓ **Training and awareness-raising programs** aimed primarily at managers and staff members most exposed to the risks of corruption and influence peddling;
 - ✓ Internal or external **accounting controls** to ensure that books, records and accounts are not used to conceal corruption or influence peddling;
 - ✓ **Internal control and assessment system of the measures implemented by the company.**
- **Tailored support for regular updates to your risk map in line with applicable legal requirements.**

- ✓ French and EU Corporate Due Diligence Duty: Assistance in drawing up/updating a vigilance plan to prevent risks of serious violations of human rights, serious harm to the environment and to human health and safety;
- ✓ Advice and assistance on environmental compliance (pollution, remediation, waste treatment, classified facilities – i.e. sites that can have damaging impacts on the environment and present potential dangers to the population - etc.) and, more generally, on related criminal, environmental and administrative liability issues;
- ✓ DOA: Review and harmonization of chains of delegations of authority and signature with a view to preventing and mitigating criminal risks for business executives;
- ✓ GDPR Audit and Compliance: Ensuring full compliance with the General Data Protection Regulation.



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Managing Partner



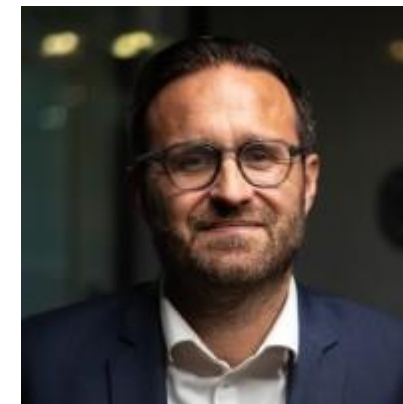
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