Corporate Compliance Programs and Challenges to the Private Sector: Seeking to Meet Expectations

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COMPANIES ARE FILLED WITH MANUALS, BUT... DO THEY UNDERSTAND THE PURPOSE?
It is easy to have a Compliance Program, but it is difficult to comply with it.

Information based on 131 big companies in Chile
WHO IS THE COMPLIANCE OFFICER?
Dentro de la compañía, ¿solo usted decidía hacer aportes a campañas políticas y a partidos políticas?
Sí.

¿Le dijo a funcionarios que esas boletas no correspondían a servicios efectivamente prestados?
Nunca le informé al directorio, ni a algún empleado, ni a ningún directivo de la empresa. No le informé a nadie. Y la razón fue porque yo sabía que este era un financiamiento fuera del Servel, por lo tanto, no tenía motivos para decírselo a alguien más.
Every area is responsible!
We need to understand that, if Compliance is part of the business core, policies and procedures of each area are the base of the Compliance Program.
It must come from the High Administration... And be measurable

- Supplier / Vendor Payments
- Customers (KYC)
- Investments
- Financing
- Gift, Travel and Entertainment expenses
- Sales and Marketing Expenses
- Monetary Incentives / Remuneration Policies
- Performance Assessment
- Globalization / Internationalization
- Conflicts of Interest
- Public Official Relations
COMPANYS ARE WORRIED OF BEING JUDGED BY THE PRESS
PROSECUTORS HAVE TO PROVIDE CERTAINTY ABOUT COMPLIANCE PROGRAMS REQUIREMENTS, BUT AVOIDING CHECK LISTS

THEREFORE IT BECOMES ESSENTIAL TO GENERATE EVIDENCE

WHAT IS NOT MEASURED... IT IS NOT MANAGED