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Setting up a compliance
program:
the main steps to be taken

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Setting up a compliance program: the main steps to be taken

**“Being small is no excuse for not
complying with the applicable EU or
national competition rules”**

(European Commission, *Compliance matters - What companies
can do better to respect EU competition rules*, Nov. 2011)

Setting up a compliance program: the main steps to be taken

6-step process tailor-made to your company:

1. risk identification
2. risk assesment
3. risk mitigation
4. monitoring
5. updating
6. deterrence

Setting up a compliance program: the main steps to be taken

Risk identification: identify the potential risks of infringing competition rules faced by your company.

Factors to be taken into account:

- nature, size and organization of the business;
- sector of activity;
- characteristics of the market;
- interaction with competitors.

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Risk assessment: assess the level of the identified risks, rating them as high, medium or low.

Factor to be taken into account: degree and frequency of staff exposure.

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Risk mitigation: reduce the likelihood of the identified risks in a manner adequate to the level of exposure. To this end:

- implement informing and training activities;
- set up policies and procedures;
- consider organization changes.

Setting up a compliance program: the main steps to be taken

Monitoring: verify regularly that program is enforced and remains appropriate and effective.

Updating: adjust the programme if necessary.

Deterrence: bring disciplinary actions and apply penalties in case of infringing internal compliance rules.