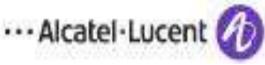
#### **BUILDING COMPLIANCE**



NICOLAS BARRE .....



VP Anti Corruption Program Office (ACPO)

Alcatel-Lucent International Compliance Officer







### A FIVE-YEAR INVESTMENT









## **Main Ingredients**

Tone at the top Build a team / assign responsibilities Describe processes Select a dedicated IT tool Compliance in existing processes Train, train, train ...









### Roadmap

2009 2010 2012 2013 2014

Establishing Foundation

Build on Foundation

Re-define Third Party Compliance Implement Compliance
Third Party Screening

Refine & complete Compliance
Third Party Screening

- Third Party
   Screening &
   Selection Process
   issued, covering
   third party
   resellers
- Expansion to include other business groups engaging sales third parties: Enterprise, RFS, ASN
- Phase-out of agents & consultants

- Monitor Y1 report
- Prohibition on use of Agents & Consultants and former A&C in any role
- Requirement to screen all third parties

- Monitor Y2 report
- Third Party
   Screening
   Processes,
   Screening Tool and
   Third Party Register
   Implemented
- Monitor Y3 report
- Third Party Screening
   Processes updated
- Completion on TPST roll-out Implementation including other non sales third parties
- Ongoing actions on the sanitization of the third party register data









## **Screening Tool - Building Blocks**

Questionnaires: CPQ - ACAF

Risk Rating - Due Diligences

**Approvals Flows** 

Trainings - Acknowledgment

**Decision Check List** 

**Escalation Process ...** 









### **Business Units Acceptance**

- Requires business acumen and good knowledge of business drivers
- Consensus amongst stake holders

# **And mainly**

 Business Units must 'see' the added value of Compliance in their daily life





