

News

MAMMEN IN 'FINANCIER WORLDWIDE' ON EFFECTIVE COMPLIANCE PROGRAMS

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Washington Counsel Jennifer Kies Mammen was quoted in the March edition of *Financier Worldwide* regarding the key components of an effective compliance program. It's anticipated that President Joe Biden will be active in pursuing and prosecuting financial crimes, including fraud, bribery and corruption, leaving many to expect increased FCPA enforcement and regulatory oversight. "The most targeted and well thought out programme is effective only if those implementing it have the capacity and authority to do so," Mammen told the publication. "In terms of essential provisions and controls, the programme must include policies and procedures that address the organisation's risks, ongoing risk assessments, third-party due diligence, investigative procedures, and a monitoring and auditing component." Compliance training is an important part of ensuring a company is FCPA compliant. "Providing practical and realistic scenarios as examples in your training is the best way to keep employees engaged and to prepare them to recognise risks and red flags they might see on the job," she said. "Also, live, interactive training can be extremely valuable to the compliance team, as questions and comments from businesspeople during training sessions may provide insight into real-world risks and red flags experienced by employees, or suggest areas of additional concern not adequately addressed by the existing programme."

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MEET THE TEAM



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