



## Greece-OECD Project: Technical Support on Anti-Corruption

# Promoting Compliance, Effective Internal Controls and Ethics in Greek Companies to Tackle Corruption

## Draft Agenda

27-31 March 2017

Athens and Thessaloniki, Greece

The OECD Anti-Corruption Division will organise a consultation workshop in Athens on 27-29 March 2017 and in Thessaloniki on 30-31 March 2017 to promote anti-corruption compliance, effective internal controls and ethics in Greek companies as part of Greece's National Anti-Corruption Action Plan (NACAP). The OECD has committed to supporting the Greek General Secretariat against Corruption and other authorities, and to provide technical guidance to implement the reform agenda in a series of pre-identified areas concerning the private sector.

This Workshop will bring together international experts from the OECD and its member countries, as well as the Greek Government and experienced private sector professionals with extensive experience in matters of compliance and anti-corruption prevention.

Each day of the Workshop is adapted to the needs of different private sector stakeholders:

- Companies of all sizes that want to start a compliance program.
- Companies that would like to refine their existing anti-corruption compliance programs.
- Business Organisations and Professional Associations that want to guide the companies and would like to explore models for future public-private co-operation, such as through collective action initiatives.

The style of the presentations will be highly interactive with actual real-life examples and roundtable discussions that will provide you with valuable and practical instruction that can be applied to your company, business organisation, division or association. Most sessions will draw from the draft OECD "Best-Practices Paper and Guidelines: Promoting Compliance, Effective Internal Controls and Ethics in Greek Companies to Tackle Corruption".

Participants who would like to attend all or part of the workshop should contact Christina Anagnostopoulou ([Christina.Anagnostopoulou@oecd.org](mailto:Christina.Anagnostopoulou@oecd.org) / +302103401226). For further information about the workshop, please contact Kristina Tremonti ([kristina.tremonti@oecd.org](mailto:kristina.tremonti@oecd.org) / +30 210 340 1227) or Claire Leger ([claire.leger@oecd.org](mailto:claire.leger@oecd.org) / +33 1 45 24 78 47).

Location of the workshops:

- Ministry of Telecommunications, General Secretariat of Information and Communication, Fragoudi 11 and Al. Pantou, Kallithea, 10163 Athens
- The Grand Hotel Palace, Monastiriou 305, 54628 Thessaloniki

## **DAY 1 - 27 March: Getting Started with a Compliance Programme**

### ➤ **9.30 – 9.45 Coffee and Registration**

### ➤ **9.45 – 10.00 Opening Remarks**

- OECD: William Loo, Deputy Head of Anti-Corruption Division
- GSAC: Margarita Gasparinatou, General Secretariat Against Corruption
- Nikos Papaioannou, Lawyer, Legal counsel at the General Secretariat of Strategic and Private Investments at Ministry of Finance, Growth & Tourism

### ➤ **10.00-10.45 Session 1. Creating a compliance culture in Greece**

- Moderator: William Loo, Deputy Head of Anti-Corruption Division
- Speakers:  
Maria Alexiou, Chair of Board of Directors, CSR

Maria Alexiou will explain why Greek small- and medium-sized enterprises (SMEs) should mobilize to combat corruption and how they can contribute to a compliance culture in Greece. He will also discuss how to overcome the challenges inherent to the Greek economic context, the costs of non-compliance and the benefits of compliance, as well as the importance of leadership.

### ➤ **10.45 – 12.15 Session 2. The fundamental steps to fight corruption in Small and Medium-sized enterprises**

How can SMEs implement anti-corruption programmes despite their size and limited resources? The OECD and German Technical Cooperation (GIZ) will present their tools that address this important question. The session will end with an example of how the KTPAE, a 60-employee SME, has implemented an efficient internal control system, as well as other anti-corruption measures, and advice the company has for other SMEs that would like to do the same.

Moderator: Claire Leger, Anti-Corruption Analyst, OECD.

Ms. Leger will also present the draft Best-Practices Paper and Guidelines: Promoting Compliance, Effective Internal Controls and Ethics in Greek Companies to Tackle Corruption.

Speakers:

- Noor Naqschbandi, Director, Alliance for Integrity, German Technical Cooperation (GIZ)

- Annabella Pallada, Internal Audit, KTPAE

➤ **12.15 – 13.15 Lunch break**

➤ **13.15 – 14.00 Session 3. Drawing the line between courtesy and bribery**

How should your anti-corruption programme handle grease payments, gifts, hospitality and solicitation? This session will look at how some Greek companies address these issues in the Greek context, and what lessons can be learned for SMEs developing their own compliance programmes.

Moderator: Claire Leger, OECD Anti-Corruption Analyst. Ms. Leger will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of facilitation payment, solicitation and gifts in the draft Best-Practices Paper and Guidelines.

Speakers:

- Epaminondas Chandros, Director of Internal Control, WIND HELLAS
- Irini Kefalogianni, Legal Manager, Coca Cola Hellas
- Dr. Stefanos Charaktiniotis, Senior Associate, Zepos & Yannopoulos Law Firm

➤ **14.00 – 14.45 Session 4. Putting your programme into action: Training and sanctions**

Compliance programmes cannot exist only on paper; they have to be implemented through training and enforcement. But many Greek SMEs have yet to do so, according to the OECD Private Sector Stakeholder Survey. In this session, Greek experts will give short presentations on their experience with compliance training and enforcement. This will be followed by an open discussion on how these measures can be deployed in SMEs with limited budgets.

Moderator: Kristina Tremonti, OECD Anti-Corruption Analyst. Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of training and sanctions in the draft Best-Practices Paper and Guidelines.

Speakers:

- Noor Naqschbandi, Director, Alliance for Integrity, German Technical Cooperation (GIZ)
- Maria Alexiou, Chair of Board of Directors, CSR Hellas (TBC)

➤ **14.45-15.15 Coffee break**

➤ **15.15 – 16.00 Session 5. Expanding your business opportunities with a strong anti-corruption compliance programme**

A sound compliance programme is good for profits not only because it reduces the cost of corruption, but also because it can help companies win new business opportunities. Representatives from multinational companies in this session will explain why. The Ministry of Foreign Affairs will also give advice to SMEs trying to expand overseas in corruption-prone markets.

Moderator: Kristina Tremonti, OECD Anti-Corruption Analyst. Ms. Tremonti will also present the relevant findings of the OECD Stakeholder Survey, and the draft Best-Practices Paper and Guidelines.

Speakers:

- Theodosios Hiotis, Manager of Internal Controls, Papastratos Phillip Morris International
- Christina Kaprou, Compliance Coordinator, AB Basilopoulos
- Leonidas Papakonstantinidis, Head of the Business Department (B8) of the Ministry of Foreign Affairs

➤ **16.00 Conclusions**

## DAY 2 - 28 March, Athens: Improving Your Existing Compliance Programme

- **9.30 – 9.45 Coffee and Registration**
- **9.45 – 10.00 Opening Remarks**
  - OECD: William Loo, Deputy Head of Anti-Corruption Division
- **10.00 – 10.45 Session 1. Why your compliance program can shape the Greek business environment**

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD

Speaker:

- Giorgos Raounas, Managing Director, Head of Corporate Governance, KPMG

Mr. Raounas will explain the importance of maintaining a robust compliance program that is adapting to the Greek economic environment and can be instrumental in shaping the way business is done in Greece.

- **10.45 – 11.45 Session 2. Political Corruption and Business**

Conflicts of interest and the financing of political parties by companies is one of the biggest corruption risk facing Greek businesses, according to the Private Sector Stakeholder Survey. This session will examine how some companies have addressed these concerns, and potential government response to these issues.

Moderator: Claire Leger, Anti-Corruption Analyst, OECD. Ms. Leger will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of political corruption in the draft Best-Practices Paper and Guidelines.

Speakers:

- Antonis Baltas, Lawyer, Legal Advisor, GSAC
- Antonis Evagelidis, Chief Compliance Officer, Vianex
- Peristera Katana, Compliance Reporting and Case Management, OTE

- **11.45 – 12.00 Coffee break**
- **12.00 – 13.00 Session 3. Corruption risks in the supply chain and with third parties: oversight and due diligence**

In this session, panelists will discuss the importance of designing a compliance programme to mitigate or avoid liability arising from third party conduct. Relevant issues for discussion include the choice of third parties that should be covered.

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD, Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the relevant recommendations contained in the draft Best-Practices Paper and Guidelines.

Speakers:

- Aggeliki Sofou, Head Compliance Officer, Athenian Brewery
- Manolis Valourdos, Credit Manager, L'Oréal
- Sofoklis Karapidakis, Head of Compliance, Siemens AE

➤ **13.00 – 14.00 Lunch**

➤ **14h00 – 15.00 Session 4. Preventing corruption for internationally active companies**

Internationally-active companies face corruption risks not only in Greece but abroad. This session will consider important tasks for companies operating in countries with high levels of corruption, such as identifying and acknowledging processes of cross-border regulations and being aware of laws and guidance in foreign jurisdictions such as the U.S. FCPA and UK Bribery Act.

Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD

Speakers:

- John Giannakakis, Regional Counsel Southern Europe, G4S
- Dimitra Kostini, Chief Corporate Compliance Officer, AXA Insurance
- Tatiana Anastassiadi, Senior Associate, Alvarez & Marsal

➤ **15.00 – 15.15 Coffee break**

➤ **15.15 –16.00 Session 5. Standards, Certification and Accreditation Instruments for Corporate Integrity**

International integrity standards are globally recognized benchmarks for compliance programs that can assist companies to preserve integrity and manage corruption risks. These standards are adaptable to the nature and specifications of each company and provide guidance for establish, developing and implementing a compliance program.

This session will approach the following issues: What are the best standardisation options, including the ISO anti-bribery management systems standard (ISO 37001) and trader accreditation programmes (such as the Authorised Economic Operator accreditation)? What are the purpose, requirements, costs and expected outcomes for a company?

Moderator: Claire Leger, Anti-Corruption Analyst, OECD

Speaker:

- Claire Tetart, Anti- Corruption Certification Coordinator, Ethic Intelligence

➤ **16.00 Conclusions**

## DAY 3 - 29 March, Athens: Collective Actions to Fight Corruption

### ➤ 9.30 – 10.45 Session 1. Play collective to be stronger

Collective action is rising fast up the global corporate agenda, with leading thinkers and top executives acknowledging its importance to their companies' anti-corruption and compliance efforts. But while practitioners are aware of the need for collective action, building capacity remains a challenge. In this panel discussion, speakers will discuss the very importance of collective actions, why capacity building is needed and how the current gap can be addressed in Greece.

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD, Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of collective actions in the draft Best-Practices Paper and Guidelines.

Speaker:

- Takis Papadimitriou, Vice President of Board of Directors, CSR Hellas

### ➤ 10.45 – 11.15 Coffee break

### ➤ 11.15 – 12.00 Session 2. Successful collective action in the maritime sector: Maritime Anti-corruption Network

To demonstrate theory with concrete examples, this session will look at the [Maritime Anti-Corruption Network](#) (MACN). This initiative has worked with multiple stakeholders across various countries to tackle the root causes of corruption. Participants will gain an understanding of achievement of existing initiatives. They further will have the opportunity to learn about effective cooperative anti-corruption efforts between private sector, authorities and civil society that foster integrity in the maritime sector.

- Moderator: Claire Leger, Anti-Corruption Analyst, OECD
- Speakers: Sam Megwa, Strategy, Risk & Compliance Manager, BP Shipping;  
Chair of the Maritime Anti-Corruption Network

### ➤ 12.00-13.15 Lunch break

### ➤ 13.15 – 14.15 Session 3. Role of Business Organisations in helping companies to combat corruption

This session will consider on-going initiatives of business organisations in Greece and internationally to help companies to develop their codes of conduct, anti-corruption compliance programmes and collective actions.

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD, Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey.

Speakers:

- Aris Sygros, International Chamber of Commerce
- Anthony Gortzis, President, European Business Ethics Network (EBEN)
- Gerasimos Livadas, Secretary General, Association of Health -Research and Biotechnology Industry

- Avgi Economidou, Associate Advisor, Business Environment and Regulatory Affairs, Hellenic Federation of Enterprises (SEV)

➤ **14.15 – 14.45 Coffee break**

➤ **14.45 – 16.00 Session 4. Dialogue with government stakeholders: What can the government do to support private sector anti-corruption initiatives?**

The private sector should not and cannot be left to fight corruption alone. Its efforts need to be complemented and supported by the government. During this session, participants will learn about some existing government efforts such as those by the Ministry of Foreign Affairs that has a long-standing policy of informing Greek companies interested in doing business abroad about the economy and level of corruption in the country in question. The session will also be an opportunity for other government stakeholders to present ideas for future engagement and to hear the private's views on the government's proper role in supporting anti-corruption efforts.

Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD

Speakers:

- Leonidas Papakonstantinidis, Head of the Business Department (B8) of the Ministry of Foreign Affairs
- Representative of the General Secretariat against Corruption
- Giannis Retsas, Director of Investments, Enterprise Greece

➤ **16.00: Conclusions of the workshop in Athens**

## DAY 4 - 30 March: Your anti-corruption compliance programme in practice

### ➤ 9.30 – 9.45 Coffee and Registration

### ➤ 9.45 – 10.15 Session 1. Opening remarks: Creating a compliance culture in Greece

- OECD: William Loo, Deputy Head of Anti-Corruption Division
- GSAC: Ermofili Soultanidou, Financial Inspector, Internal Audit Service of Public Administration, Ministry of Justice

This session will explain why Greek companies should mobilize to combat corruption and how they can contribute to a compliance culture in Greece. Speakers will also discuss how to overcome the challenges inherent to the Greek economic context, the costs of non-compliance and the benefits of compliance as well as the importance of a strong leadership.

### ➤ 10.15 – 11.00 Session 2. Drawing the line between courtesy and bribery

How should your anti-corruption programme handle grease payments, gifts, hospitality and solicitation? This session will look at how some Greek companies address these issues in the Greek context, and what lessons can be learned for SMEs developing their own compliance programmes.

Moderator: Claire Leger, OECD Anti-Corruption Analyst. Ms. Leger will present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of facilitation payment, solicitation and gifts in the draft Best-Practices Paper and Guidelines.

- Kostas Hatzikostas, Lecturer Penal Law, Aristotelio Law School Thessaloniki, Research Lab for Transparency, Corruption and Economic Crime
- Apostolos Tasikas, Lecturer Civil and Labor Law, Aristotelio Law School Thessaloniki
- Andreas Koutoupis, Head of Corporate Governance, Risk Management and Internal Control, Mazars Greece

### ➤ 11.00-11.30 Coffee break

### ➤ 11.30 – 12.15 Session 3. Putting your programme into action: Training and sanctions

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Moderator: Kristina Tremonti, OECD Anti-Corruption Analyst. Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of training and sanctions in the draft Best-Practices Paper and Guidelines.

- Thomas Delkos, Head of Legal Department, LIDL Hellas

➤ **12.15 – 13.15 Lunch break**

➤ **13.15 – 14.30 Session 4. Preventing corruption for internationally active companies**

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Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD

- Zinon Chatziantonoglou, Head of Compliance and Operational Risk Management, Black Sea Trade and Development Bank

➤ **14.30-14.45 Coffee break**

➤ **14.45-15.30 Session 5. Corruption risks in the supply chain and with third parties: oversight and due diligence**

In this session, panellists will discuss the importance of designing a compliance programme to mitigate or avoid liability arising from third party conduct. Relevant issues for discussion include the choice of third parties that should be covered.

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD, Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the relevant recommendations contained in the draft Best-Practices Paper and Guidelines.

- Thomas Delkos, Head of Legal Department, LIDL Hellas

➤ **15.30 Conclusions**

## DAY 5 - 31 March: Collective actions to fight corruption

### ➤ 9.30 – 9.45 Coffee and Registration

### ➤ 9.45 – 10.30 Session 1. Play collective to be stronger

Collective action is rising fast up the global corporate agenda, with leading thinkers and top executives acknowledging its importance to their companies' anti-corruption and compliance efforts. But while practitioners are aware of the need for collective action, building capacity remains a challenge. In this panel discussion, speakers will discuss the very importance of collective actions, why capacity building is needed and how the current gap can be addressed in Greece.

Moderator: Kristina Tremonti, Anti-Corruption Analyst, OECD, Ms. Tremonti will also present the relevant findings of the OECD Private Sector Stakeholder Survey, and the treatment of collective actions in the draft Best-Practices Paper and Guidelines.

Speaker:

- Stella Politou, Head of Services, Association of Industries Northern Greece, CSR Hellas

### ➤ 10.30 – 11.15 Session 2. Successful collective action in the maritime sector: Maritime Anti-corruption Network

To demonstrate theory with concrete examples, this session will look at the [Maritime Anti-Corruption Network](#) (MACN). This initiative has worked with multiple stakeholders across various countries to tackle the root causes of corruption. Participants will gain an understanding of achievement of existing initiatives. They further will have the opportunity to learn about effective cooperative anti-corruption efforts between private sector, authorities and civil society that foster integrity in the maritime sector.

Moderator: Claire Leger, Anti-Corruption Analyst, OECD

Speaker:

- Sam Megwa, Strategy, Risk & Compliance Manager, BP Shipping; Chair of the Maritime Anti-Corruption Network

### ➤ 11.15-11.45 Coffee break

### ➤ 11.45 – 13.15 Session 3. Role of Business Organisations in helping companies to combat corruption

This session will consider on-going initiatives of business organisations in Greece and internationally to help companies to develop their codes of conduct, anti-corruption compliance programmes and collective actions.

Moderator: Claire Leger, Anti-Corruption Analyst, OECD, Ms. Leger will also present the relevant findings of the OECD Private Sector Stakeholder Survey.

- Dimitris Lakasas, Former President and Board Member Association of Exporters Northern Greece, CEO Olympia Electronics AE
- Lila Rapti, Board Member Hellenic Institute of Internal Auditors and Head of Internal Control at Interlife Insurance

➤ **13.15 – 14.15 Lunch**

➤ **14.15 – 15.30 Session 4. Dialogue with government stakeholders: What can the government do to support private sector anti-corruption initiatives?**

The private sector should not and cannot be left to fight corruption alone. Its efforts need to be complemented and supported by the government. During this session, participants will learn about some existing government efforts such as those by the Ministry of Foreign Affairs. The session will also be an opportunity for other government stakeholders to present ideas for future engagement and to hear the private's views on the government's proper role in supporting anti-corruption efforts.

Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD

- Labros Tsogas, Head Prosecutor Court of First Instance Thessaloniki
- Stavros Keselidis, Director Internal Affairs Police, Northern Greece
- Katerina Naziri, Head of Internal Control Department, Municipality of Thessaloniki

➤ **15.30 Conclusions**