



Greece-OECD Project: Technical Support on Anti-Corruption
Risk Review Workshop: Anti-Corruption Risk Assessment guidance for
Greek companies
26-30 June 2017
Athens and Thessaloniki, Greece

The OECD Anti-Corruption Division will organize a workshop in Athens on 26-28 June 2017 and in Thessaloniki on 29-30 June 2017 to raise awareness of the risks of corruption in companies and to promote corruption risk assessments in Greek industry and companies. The OECD has committed to supporting the Greek General Secretariat against Corruption and other authorities, and to provide technical guidance to implement Greece's National Anti-Corruption Action Plan (NACAP) in 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 corruption risk assessment.

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

- All stakeholders that want to learn about corruption risks in the Greek industry.
- Companies of all sizes that want to start or refine their corruption risks assessment.
- Business Organisations and Professional Associations that want to guide companies to conduct corruption risk assessments or would like to initiate sectoral corruption risk assessments.

The style of the presentations will be highly interactive with real-life examples and roundtable discussions that will provide you with valuable and practical instruction that can be applied to your company, business organization, or association. Most sessions will draw from the draft OECD "Risk Review and Anti-Corruption Risk Assessment Guidelines for Greek Companies".

Participants who would like to attend all or part of the workshop should contact Christina Anagnostopoulou (Christina.Anagnostopoulou@oecd.org / +30 21 03 40 12 26). For further information about the workshop, please contact Kristina Tremonti (kristina.tremonti@oecd.org / +30 21 03 40 12 27) or Claire Leger (claire.leger@oecd.org / +33 1 45 24 78 47).

Location of the workshops:

- **Athens**- Bank of Greece Head Office, corner of Edouardou Lo and Stadiou Streets
- **Thessaloniki**- Thessaloniki City Hall, Vasileos Georgiou 1

DAY 1 JUNE 26 – Athens: Corruption Risk Assessment Methodology

➤ **9.30 – 9.45 Opening Remarks**

- *OECD: William Loo, Deputy Head of Anti-Corruption Division*
- *GSAC: Konstantinos Christou, General Secretary, General Secretariat Against Corruption*

➤ **9.45 - 10.30 Session 1. Corruption risks for Greek companies, Firm Structure and Firm Performance**

Dr Daphne Athanasouli has been researching for many years the relationship between corruption, firm structure, management, institutional environment and firm performance in Greece using firm level data. She will present the main findings of her research in a keynote presentation that will be followed by an open discussion with the participants to the workshop.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Key note presentation: Dr Daphne Athanasouli, Senior Lecturer in Economics and Business, College of Business, Law and Social Sciences, Derby Business School, University of Derby, United Kingdom*

➤ **10.30 – 11.15 Session 2. Methodology of corruption risk assessment Part. 1: Committing to the process: identifying personnel, data collection, tone from the top and training.**

How to commit to conducting a risk assessment that will help create or strengthen your company's anti-corruption program? This session will cover several procedural steps such as identifying the roles and responsibilities of personnel and stakeholders involved in the assessment and how to proceed with tapping into collective knowledge to gather data both internally and externally that can identify all relevant corruption risks for your company. The session will also consider the importance of higher management's engagement in prioritizing the process, encouraging staff, delegating tasks as well as incorporating the risk assessment progress and results as a regular topic during higher level management meetings. Furthermore, the importance of tailored training after schemes and risks are identified through the risk assessment will be examined. The session will also address SME-focused approaches.

- *Moderator: Kristina Tremonti, OECD Anticorruption Analyst*
- *Costas Spyropoulos, Compliance Expert, CEG Consulting*

➤ **11.15 – 11.45 Coffee break**

➤ **11.45 - 12.15 Session 3. Methodology of corruption risk assessment Part. 2: Identifying risk factors and the probability of risk occurring**

The purpose of identifying risk is to consider all aspects of an enterprise's activity that may heighten its exposure to corruption and bribery so that it can design appropriate mitigating controls in response. This session will examine different risk facts and how they can help an enterprise identify risks and schemes. Furthermore, it will address how to rate the probability of occurrence of each risk.

- *Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD*
- *Mohammed Ahmed, Deloitte USA*

➤ **12.15 – 13.00 Session 4. Methodology of corruption risk assessment Part. 3: Rating the potential impact of risk and putting your risk assessment results to action**

The impact of risk occurrence is the evaluation of all adverse legal, commercial, monetary and reputational repercussions your company can face if the risks are not effectively mitigated. This session will examine how to evaluate the impact of risk utilizing various rating methods as well as how to create an effective risk mitigating strategy to address all identified weaknesses and gaps in your company's anti-corruption program.

- *Moderator: Kristina Tremonti, OECD Anticorruption Analyst*
- *Mohammed Ahmed, Deloitte USA*

➤ **13.00 - 14.00 Lunch break**

➤ **14.00 – 14.45 Session 5. IT Solutions for Maximising your Risk Assessment Impact**

Companies with limited resources need to make the best use of technology to maximise the impact of their corruption risk assessment and compliance programme. This session will cover standardized technological tools for performing efficient corruption risk assessments.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Chris Livadas, senior site representative, Thomson Reuters*
- *Roksana Cieplowska, Ethidex TM, Canada*

➤ **14.45 – 16.00 Session 6. Case studies: Proceeding to risk assessment in your company – Rating the likelihood of risk occurring**

Participants will be divided into small groups to work on a case study with actual real-life examples and roundtable discussions before reporting their findings to the plenary.

- *Mohammed Ahmed, Deloitte USA*

DAY 2 JUNE 27- Athens: Corruption Risk Management

➤ **9.30 – 10.30 Session 1. Third party risk assessment: Identification of process vulnerabilities and risk management**

Like their counterparts elsewhere, Greek companies often hire third parties such as consultants and agents to acquire local knowledge or specific skillsets. Third parties can also be engaged in a company's supply chain. These practices can increase a company's competitiveness and efficiency. However, the third party's nature and distance from the company also present risks of corruption, as amply demonstrated by third parties' roles in many high profile corruption scandals around the world. This session will examine how these third party risks can be identified and assessed, and measures for mitigating these risks.

- *Moderator: William Loo, Deputy Head, Anti-Corruption Division, OECD*
- *Alexandra Wrage, President, TRACE International USA*

➤ **10.30– 11.30 Session 2. Conflicts of interests, corruption risks and risk management**

In a business context, conflicts of interest may arise where corporate decisions are made by individuals whose personal interests compete with those of the company's. Under these circumstances, the decisions that these individuals taken may at best not be in the company's best interests. At worst, they could result in crimes such as corruption being committed. This session will therefore look at questions such as what constitutes a conflict of interests, their link to corruption prevention as well as how to operationalize conflicts of interest policy within an organization and in dealing with third parties.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Melissa Khemani, Principal, Project Integrity, European Bank for Reconstruction and Development (ERBD)*
- *Laurence Glynn, Associate Director, Office of the Chief Compliance Officer, European Bank for Reconstruction and Development (ERBD)*

➤ **11.30 – 12.00 Coffee break**

➤ **12.00 – 12.45 Session 3. Follow Up, monitoring, enforcement and reporting**

The risk assessment process does not end with the identification of risks and mitigating measures. The process can only be effective if there is effective and regular follow-up, monitoring, and enforcement within the company. Reporting the assessment to senior management and in some cases externally can also be crucial to success. This session will therefore examine challenges that

could arise in these aspects of the risk assessment process and practical solutions for overcoming these hurdles.

- *Moderator: Kristina Tremonti, OECD Anti-corruption Analyst*
- *Konstantinos Panagos, Head of Corporate Security Risk and Compliance, Vodafone*

➤ **12.45 – 14.00 Lunch break**

➤ **14.00 – 16.15 Session 4. Case studies**

Participants will be divided into small groups to work on a case study with actual real-life examples and roundtable discussions before reporting their findings to the plenary.

- *Alexandra Wrage, President, TRACE International, USA*

The EBRD-drafted case study will look at conflicts of interests scenarios, as well as broader integrity risks, drawing from real cases within a Greek context.

- *Laurence Glynn, Associate Director, Office of the Chief Compliance Officer, European Bank for Reconstruction and Development (EBRD), United Kingdom*
- *Roberto De Sanctis, Associate Director, Office of the Chief Compliance Officer, European Bank for Reconstruction and Development (EBRD), United Kingdom*

➤ **16.15 Conclusions of the workshop in Athens**

DAY 3 JUNE 28- Athens: Sectoral and Processes Corruption Risks

➤ 9.30 – 10.00 Session 1. Corruption Risks in the Greek Industry

The probability and types of corruption risks vary according to the sector in which the enterprise conducts business and the processes it engages with. According to the Greek companies, certain sectors are linked to increased levels of bribery risk than others due to specific risk factors. These OECD Private Stakeholder Survey and the Ernst and Young *Human instinct or machine logic – which do you trust most in the fight against fraud and corruption* findings will be presented and discussed in this session.

- Moderator: Claire Leger, OECD Anticorruption Analyst
- Yannis Dracoulis, Senior Manager, Business Integrity and Compliance Management, Ernst & Young

➤ 10.00–11.00 Session 2. Corruption risks in procurement

Procurement and sourcing goods and services from vendors can be prone to bribes and kickbacks. An enterprise's risk assessment must therefore identify the frequency and extent of such transactions in order to determine the impact that this risk may bear on the enterprise. This session will examine risks associated with cases of public tender bidding, gaining access to the tender process as well as other areas of procurement that carry heightened risks.

- Moderator: Kristina Tremonti, OECD Anticorruption Analyst
- Dr. Maria Stylianidou, Independent Authority for Public Procurement
- Johannes S. Schnitzer, Schnitzer Law, Austria

➤ 10.00-11.15 Coffee Break

➤ 11.15–12.00 Session 3. Corruption risks in the export sector

The import/export and transportation of goods may be disposed to facilitation payments to public officials at customs or border checks. Facilitation payments are common in numerous countries but are nevertheless illegal under anti-bribery laws. This session will address the risks associated with the exportation of goods and the legal repercussions of both domestic and foreign anti-bribery laws.

- Moderator: William Loo, OECD Anticorruption Analyst
- Nikolaos Theodorakis, Associate at Alston & Bird LLP and Lecturer at University of Oxford, United Kingdom

➤ 12.00 – 13.00 Session 4. Corruption risks in the banking sector

This session will present an overview of EBRD engagement in the Greek Banking sector, areas of governance reform and an overview of identified integrity risks. The presentation will then highlight

specific corruption risks within the Banking Sector more generally, including themes surrounding identifying ultimate beneficial owners and the use of third parties/intermediaries. Best practices on how to incentivize ethics and integrity in banks will also be discussed.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Melissa Khemani, Principal, Project Integrity, European Bank for Reconstruction and Development (ERBD), United Kingdom*
- *Roberto De Sanctis, Associate Director, European Bank of Reconstruction and Development (ERBD), United Kingdom*

➤ **13.00 – 14.15 Lunch**

➤ **14.15 – 14.45 Session 5. Toxic Transactions Training**

Anti-corruption risks and compliance training focusing on transactions.

[TRACE International Toxic Transactions training] *Babis Kamarinopolous, Genesis Pharma*

➤ **14.45 – 15.45 Session 6 Best Practices Panel**

This session will examine Greek company examples of successful risk assessment processes, best practices and lessons learned.

- *Moderator: Kristina Tremonti, OECD Anticorruption Analyst* *Giorgos Rousalis, Promotional Materials Compliance Manager, Pfizer Greece*
- *Dimitrios Papaioannou, Head of the Internal Audit Division, Alpha Bank*
- *Vavylis Dionisis, Prevention, Policies & Training Senior Manager, OTE Group*

➤ **15.45 Conclusions**

DAY 4 June 29– Thessaloniki: Corruption Risk Assessment Methodology

➤ **9.45 – 10.00 Opening Remarks**

- *OECD: William Loo, Deputy Head of Anti-Corruption Division*
- *GSAC: Margarita Gasparinatou, General Secretariat Against Corruption*

➤ **10.00 – 10.45 Session 1. Corruption risks for Greek companies, Firm Structure and Firm Performance**

Dr Daphne Athanasouli has been researching for many years the relationship between corruption, firm structure, management, institutional environment and firm performance in Greece using firm level data. She will present the main findings of her research in a keynote presentation that will be followed by an open discussion with the participants to the workshop.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Key note presentation: Dr Daphne Athanasouli, Senior Lecturer in Economics and Business, College of Business, Law and Social Sciences, Derby Business School, University of Derby, United Kingdom*

➤ **10.45 – 11.15 Coffee break**

➤ **11.15 – 12.30 Session 2. Methodology of corruption risk assessment: Identification of vulnerabilities and risk factors, Identification of controls and evaluation, Implementation of the risk assessment**

The purpose of identifying risk is to consider all aspects of an enterprise's activity that may heighten its exposure to corruption and bribery so that it can design appropriate mitigating controls in response. This session will examine different risk factors and how they can help an enterprise identify risks and schemes; how to rate the probability of occurrence of each risk; how to evaluate the impact of risk utilizing various rating methods as well as how to create an effective risk mitigating strategy to address all identified weaknesses and gaps in your company's anti-corruption program.

- *Kristina Tremonti, OECD Anticorruption Analyst*
- *Chloé Auffret, Deloitte Paris, France*

➤ **12.30 – 13.30 Lunch break**

➤ **13.30 – 14.30 Session 4. Case study. Proceeding to risk assessment in your company- Evaluating your current anti-corruption program and tailoring it to risk assessment findings**

Small group discussion to be conducted around a case study

- *Chloé Auffret, Deloitte Paris, France*

➤ **14.30 – 15.00 Coffee break**

➤ **15.00 – 16.00 Session 5. Best Practices Panel**

This session will examine Greek company examples of successful risk assessment processes, best practices and lessons learned.

- *Moderator: Kristina Tremonti, Anticorruption Analyst*
- *Apostolos Chrysostomidis, Group Internal Audit Manager, Kleemann*
- *Lilla Rapti, Head of Internal Audit, Interlife Insurance , Member of Board of Directors of Hellenic Institute of Internal Auditors*
- *Ioannis Michalopoulos, Internal Audit Manager, EDA THESS Gas Distribution Company*

➤ **16.00 Conclusions**

DAY 5 June 30 - Thessaloniki: Sectoral Corruption Risk Assessments

➤ 9.45 – 10.15 Session 1. Corruption Risks in the Greek Industry

The probability and types of corruption risks vary according to the sector in which the enterprise conducts business and the processes it engages with. According to the Greek companies, certain sectors are linked to increased levels of bribery risk than others due to specific risk factors. These OECD Private Stakeholder Survey and the Ernst and Young *Human instinct or machine logic – which do you trust most in the fight against fraud and corruption* findings will be presented and discussed in this session.

- Moderator: *Claire Leger, OECD Anticorruption Analyst*
- *Yannis Dracoulis, Senior Manager, Business Integrity and Compliance Management, Ernst & Young*

➤ 10.15 – 11.00 Session 2. Third Party Risk Assessment

Like their counterparts elsewhere, Greek companies often hire third parties such as consultants and agents to acquire local knowledge or specific skillsets. Third parties can also be engaged in a company's supply chain. These practices can increase a company's competitiveness and efficiency. However, the third party's nature and distance from the company also present risks of corruption, as amply demonstrated by third parties' roles in many high profile corruption scandals around the world. This session will examine how these third party risks can be identified and assessed, and measures for mitigating these risks.

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➤ 11.00 – 11.45 Session 3. Conflicts of Interest

In a business context, conflicts of interest may arise where corporate decisions are made by individuals whose personal interests compete with those of the company's. Under these circumstances, the decisions that these individuals taken may at best not be in the company's best interests. At worst, they could result in crimes such as corruption being committed. This session will therefore look at questions such as what constitutes a conflict of interest; how such conflicts can arise in a business setting; and what can be done to prevent corruption arising from conflicts.

- Moderator: *Kristina Tremonti, OECD Anticorruption Analyst*
- *Stefanos Charaktiniotis, Zepos and Yanopoulos Law Firm*

➤ 11.45 – 12.15 Coffee Break

➤ **12.15 – 13.00 Session 4. IT Solutions for Maximising your Risk Assessment Impact**

Companies with limited resources need to make the best use of technology to maximise the impact of their corruption risk assessment and compliance programme. This session will cover standardized technological tools for performing efficient corruption risk assessments.

- *Moderator: Claire Leger, OECD Anticorruption Analyst*
- *Chris Livadas, senior site representative, Thomson Reuters*
- *Roksana Cieplowska, Ethidex TM, Canada*

➤ **13.00 – 14.15 Lunch**

➤ **14.15 – 15.45 Session 5. Training and Case studies: Proceeding to corruption risk assessment in your company**

Anti-corruption risks and compliance training and interactive sessions in small groups with actual real-life examples and roundtable discussions.

- **[TRACE International Anti-Bribery training]** *Stefanos Charaktiniotis, Zepos and Yanopoulos Law Firm*
- **[TRACE International Toxic Transactions training]** *Babis Kamarinopolous, Genesis Pharma*
- **[Conflicts of interest Case study]** *Kristina Tremonti, Claire Leger, OECD Anticorruption Analysts*

➤ **15.45 Conclusions**