



# SPARK COMPLIANCE CONSULTING

## Compliance and Ethics Program Review and Recommendations Report

# Introduction

Spark Compliance Consulting's Comprehensive Program Assessment gives a clear picture of where your compliance program is excelling, and where it has opportunity for improvement. Practical, pro-business recommendations are provided so that you can optimize and right-size your compliance program to meet best practices and regulator expectations, while still working with the business in a pragmatic way.

# CCEPA Methodology

Your program is global, so you need to know how you're evaluated on a global scale. Your program will be evaluated and measured against criteria enumerated in the Department of Justice's Evaluation of Corporate Compliance Program guidance, as well as applicable criteria provided in:

DOJ's Evaluation of Corporate Compliance Programs Guidance

Brazil Clean Companies Act  
France's Sapin II

European General Data Protection Regulation/California Consumer Protection Act

World Economic Forum's Good Practice Guidelines on Conducting Third-Party Due Diligence

ISO 37001 Anti-Bribery Management Systems Standard

Benchmarking Reports from industry groups such as NAVEX, Steel and the SCCE

United States Federal Sentencing Guidelines, Section 8

OECD Good Practice Guidance on Internal Controls, Ethics and Compliance

The U.S. Department of Justice's Resource Guide to the Foreign Corrupt Practices Act

Department of Justice Justice Manual

AdvaMed Code, MedTech Code, HIPAA

The Ministry of Justice Guidance to the UK Bribery Act

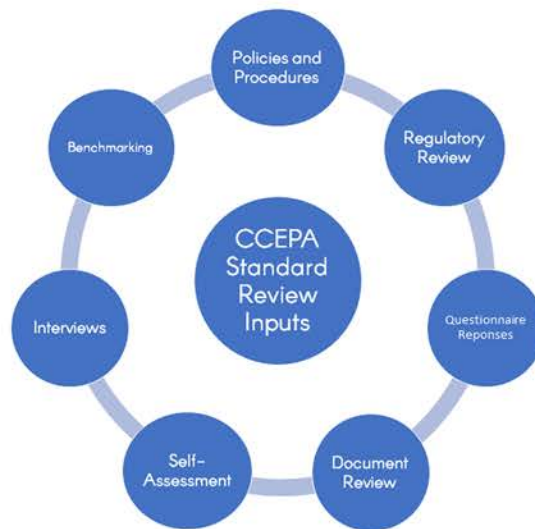
# CCEPA Inputs

## Standard Inputs

**CCEPA Methodology uses seven standard inputs, plus three optional premium inputs, to evaluate your program.**

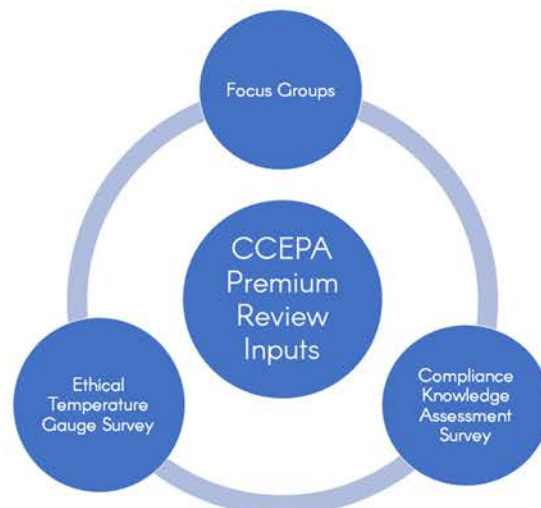
**Spark Compliance takes a comprehensive view of your compliance and ethics program in order to properly assess the program's efficiency and effectiveness.**

**We look at documents and intentions, as well as execution.**



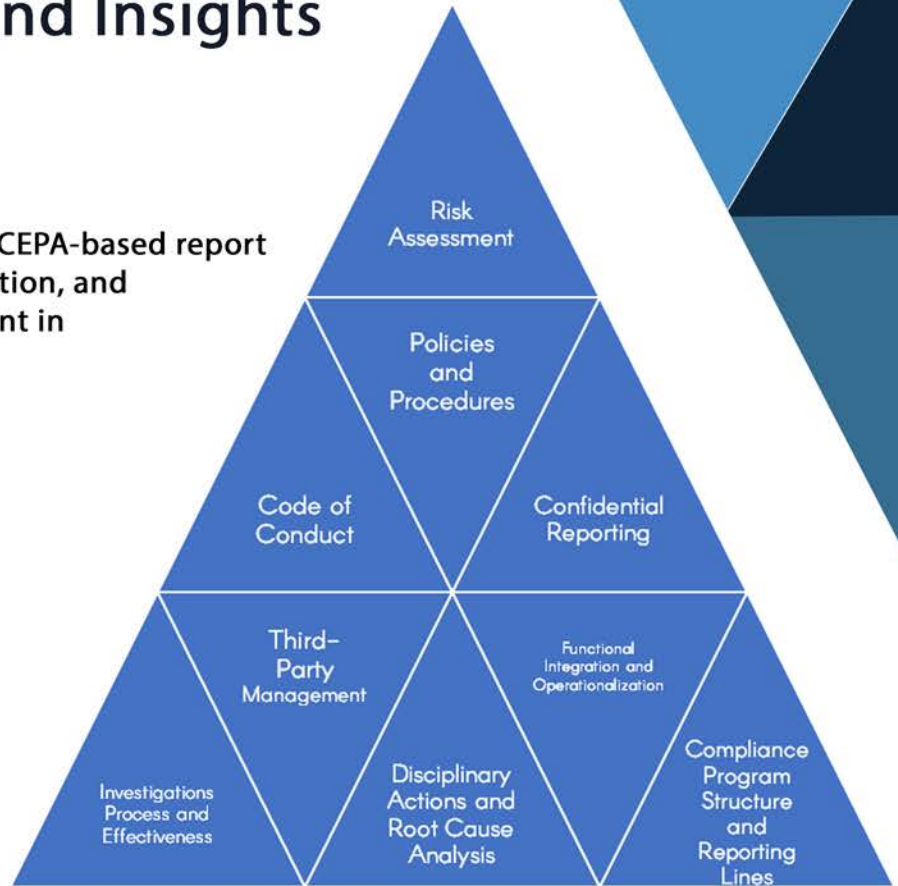
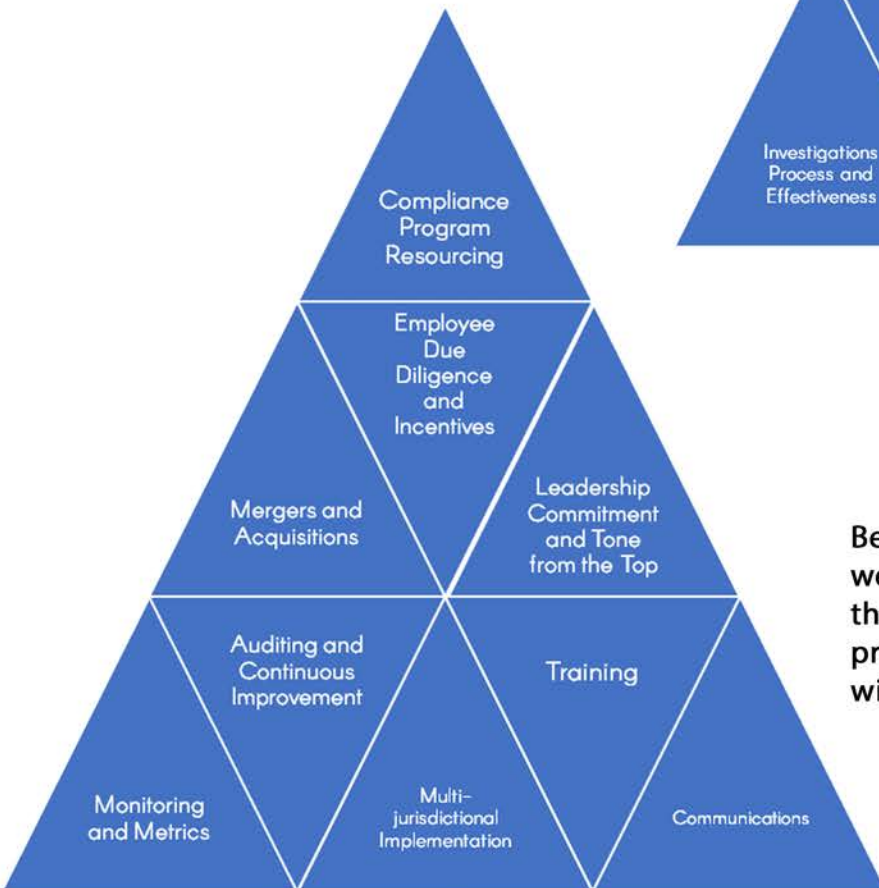
## Premium Inputs

**Premium inputs give additional information, providing a 360 degree view of your compliance program through the eyes of your employees. This information is invaluable for shaping the execution of your program, and understanding how your efforts are experienced on the ground.**



# World-Class Results Providing Profound Insights

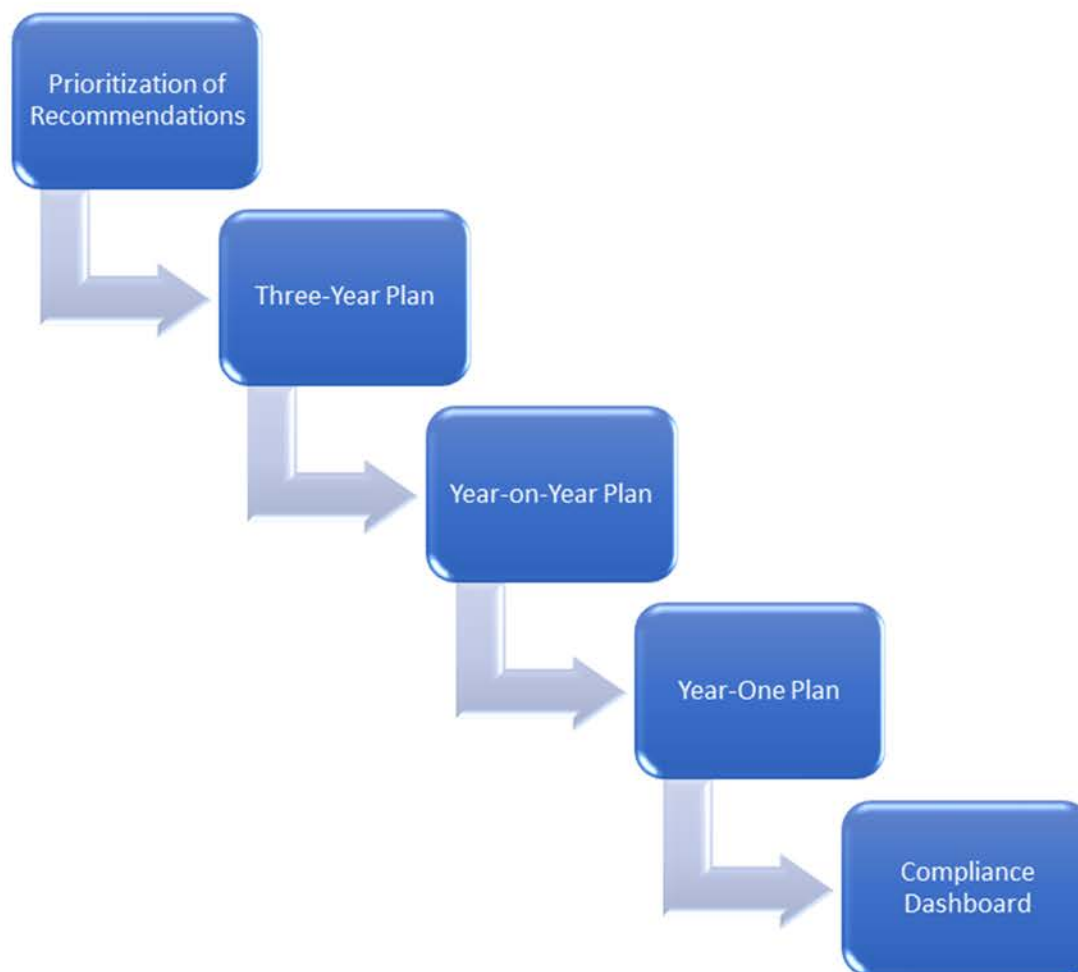
A Spark Compliance Consulting CCEPA-based report provides detailed analysis, evaluation, and recommendations for improvement in 18 crucial areas of your program. These include:



**Because no compliance program is perfect, we ground our recommendations in practices that can be implemented in a pro-business and pragmatic way, so that compliance can partner with the business, instead of working against it.**

## Optional Recommendations Implementation Roadmap

Once you have your Comprehensive Compliance and Ethics Program Assessment Report, the next step is to implement the recommendations. Because it can be overwhelming to prioritize the implementation of recommendations, Spark Compliance offers our expertise in creating an Implementation Roadmap to ensure the hard work you've done assessing the program pays off in continuous improvement and moving your program to the next level. We do this by:



Our Implementation Roadmap takes a pragmatic, proportionate, pro-business approach to program elevation. Your report will ensure that you have the tools you need to successfully embed and operationalize your program throughout the company.

# About Spark Compliance

Spark Compliance Consulting provides multinational organizations with pragmatic, proportionate, and pro-business compliance and ethics solutions. We are the leading provider of anti-bribery, data privacy, and ISO 37001 anti-bribery certification services. We provide world-class compliance and privacy program evaluations, risk assessments, GDPR and CCPA data protection advice, and compliance program development services.

Spark Compliance has been featured in print, including in the Wall Street Journal, FCPA Blog, Compliance Week Magazine, and Risk Universe Magazine, as well as in videos and webinars offered throughout the world.

In 2019, CEO Kristy Grant-Hart was awarded the Trust Across America Top Thought Leader In Trust Award. Spark Compliance is a finalist in the 2020 Excellence in Compliance Awards for Best Consulting/Advisory Firm and is a three-time finalist for Best Compliance Consulting Firm of the Year at the Women in Compliance Awards.

We specialize in the empowerment of the compliance function within business operations and the importance of establishing and maintaining an ethical culture.



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AS SEEN IN



**The FCPA Blog**



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