



LEDERNETTVERKET INTERNREVISJON

Om Compliancefunksjonen i Kongsberg Gruppen

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Intern revisjon vs compliance

«Same-same but different?

Internrevisjonens formål

Å fremme og beskytte organisasjonens verdier gjennom å gi risikobaserte og objektive bekreftelser råd og innsikt.

Definisjon av internrevisjon

Internrevisjon er en uavhengig, objektiv bekreftelses- og rådgivningsaktivitet som har til hensikt å tilføre merverdi og forbedre organisasjonens drift. Den bidrar til at organisasjonen oppnår sine målsettinger ved å benytte en systematisk og strukturert metode for å evaluere og forbedre effektiviteten og hensiktsmessigheten av organisasjonens prosesser for risikostyring, kontroll og governance.

Compliance in KONGSBERG is about how we define, plan, organize and execute our work related to adhering to those rules and regulations, which are general in nature and particularly important to the organization. KONGSBERG has chosen to define compliance as a function with the responsibility for our compliance with all rules and regulations related to the non-financial side of our business. (Financial compliance is handled by our group's financial organization.)

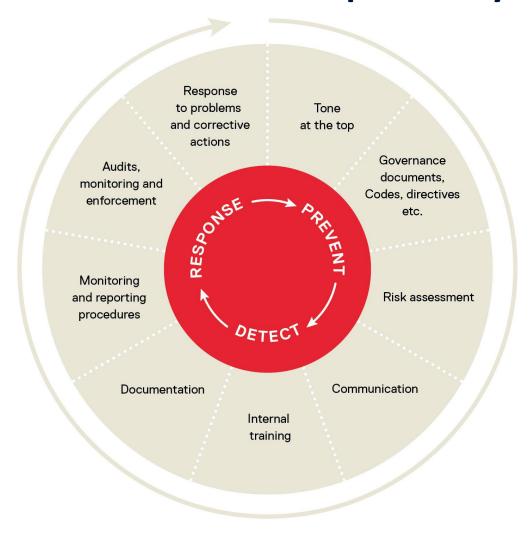


The Corporate Compliance Officer's responsibility

- **Develop, implement and maintain** a compliance system, including governing documents for the areas of discipline responsibility
 - Coordinate oversight of compliance functions in the business areas, including overseeing the design and implementation by the organization of the compliance system to ensure areas of risk are assessed and mitigated
 - **Providing advice** and guidance to personnel on the compliance system
 - Assess on a continual basis whether the compliance system is adequate to manage effectively the bribery risks faced by the business areas and being effectively implemented
 - **Ensuring** that the anti-corruption program conforms to the requirements of relevant anti-corruption laws and standards, as Norwegian Law, FCPA, UK Bribery Act and ISO 37001.
 - Monitoring the Business Areas reporting and supervision of the use of market representatives.
 - Monitor and verify compliance with the Compliance System by performing risk based audits with internal and/or external audit teams.
 - Meet with the CEO and the CAO on a quarterly basis to present and review status on monitoring activities and discuss strategic and operational topics.
 - Present status of compliance activities to the Corporate Management Team, Audit Committee and Kongsberg Group BoD on behalf of CEO once every year or more frequent as needed.



Compliance system



Non-financial compliance area
Anti-corruption
Sustainability and corporate social responsibility
Export and trade regulations
Whistleblowing
Competition law
HSE
Professional secrecy/Security (incl protection of
information and confidentiality)
Insider trading
Anti-money laundering
Data Privacy
Responsible Tax



Developing the Risk Management model A model for tomorrow?

Risk Governance				
Assurance Providers	3rd LINE OF DEFENSE	RISK PROCESS AND CONTENT Monitoring - Liaise with senior management and/or board - Rationalize and systematize risk assessment and governance reporting - Provide oversight on risk-management content/processes, followed by second line of defense (as practical) - Provide assurance that risk-management processes are adequate and appropriate	Assurance Providers	Strengthen this line?
Standard Setters	2 nd LINE OF DEFENSE	Provide guidance and coordination among all constituencies Initiate change, integration, operationalization of new events Liaison between third line of defense and first line of defense Oversight over certain risk areas (e.g., credit, market) and in terms of certain enterprise objectives (e.g., compliance with regulation)	Standard Setters	
Business Owners	1 st LINE OF DEFENSE	RISK CONTENT Accountability – Manage risks/implement actions to manage and treat risk – Comply with risk-management process – Implement risk-management processes where applicable – Execute risk assessments and identify emerging risk	Business Owners	The three lines of defense Making the transition to a mature risk management model

