

Nordic Ethics and Compliance Survey 2023

KPMG Norge, Sverige, Finland og Danmark

14. september 2023



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Agenda

Innledning – om spørreundersøkelsen

Diskusjon med panelet:

1. Tone og handling fra toppen

Hvordan arbeider styret og ledelsen med etikk og etterlevelse (compliance)?

- Kjenner dere dere igjen i funnene i undersøkelsen?
- Internrevisors involvering med styret og ledelse

2. Hva er de viktigste risikoene og hvordan arbeides det med risiko-kartlegging?

- Er funnene i undersøkelsen gjenkjennbare?
- Hva tenker dere er de største utfordringene?

3. Hvor modent er arbeidet med forebyggende og avdekkende tiltak?

- Er funnene i undersøkelsen gjenkjennbare?
- Hva tenker dere er de største utfordringene?

Avslutning - Anbefalinger for reisen videre

Med dere i dag fra KPMG



Beate Hvam-Laheld
Partner Forensic



Kenneth Hansen
Direktør, Head of
Internal audit Solutions



Eivind Pytte Ødegaard
Direktør, Head of
Responsible Supply
Chains

I panelet:



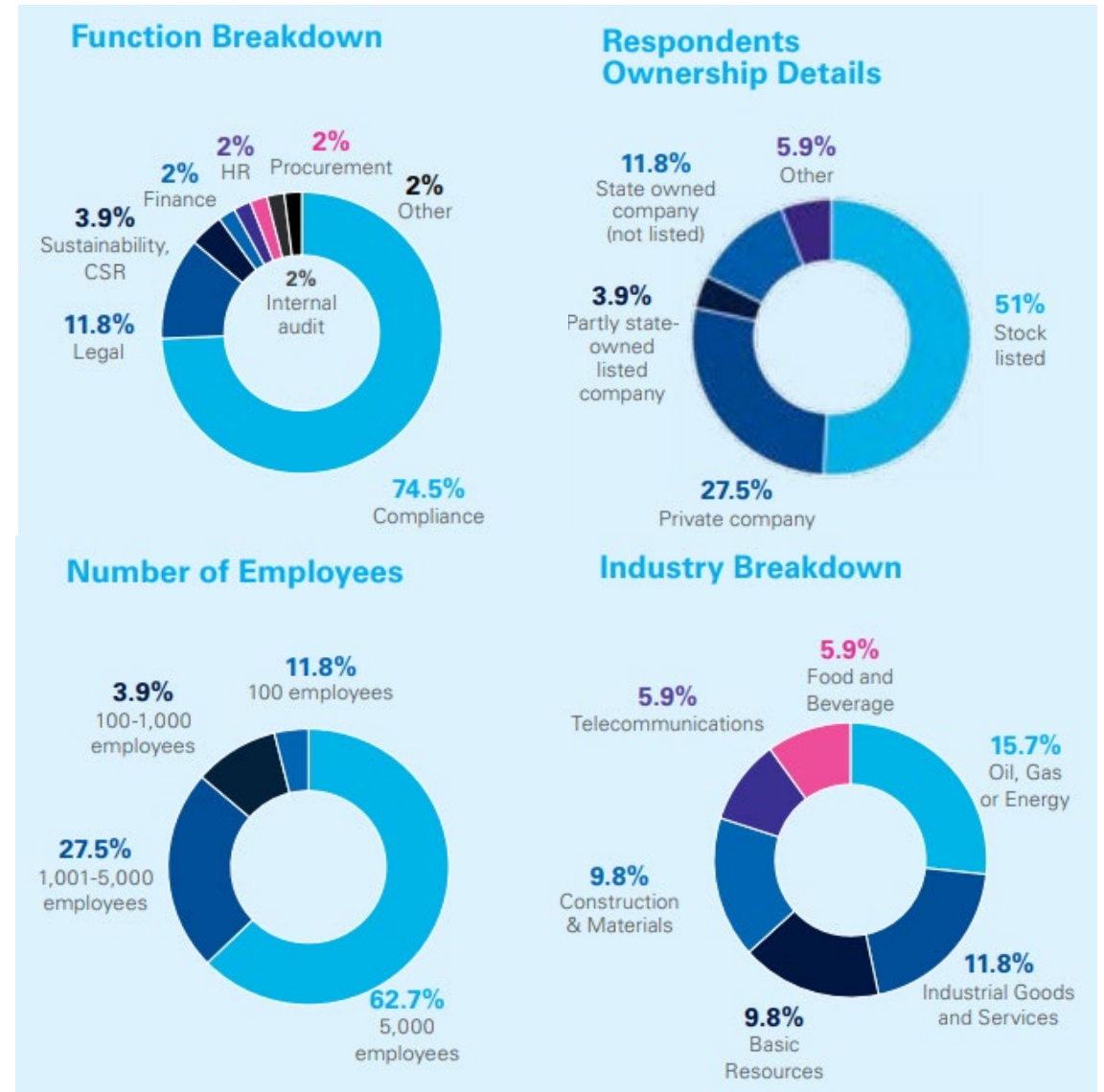
Margrethe Husebø
Vice President CAI
Misconduct
Equinor ASA



Jorunn Kvåle
VP Internal Audit and
Compliance
Aker BP ASA

Om spørreundersøkelsen

- KPMG har for **3dje året** gjennomført en spørreundersøkelse blant nordiske virksomheter for å analysere hvor virksomheter er på sin «**compliance-reise**»
- 51 selskaper deltok
 - en overvekt av **større virksomheter** med mer enn 1000 ansatte (90,2%).
 - både **private og offentlige** virksomheter.
 - de fleste respondentene arbeider i **Compliance-funksjonen** (74.5%)



[Nordic Ethics and Compliance Survey 2023](#)



01

Tone og handling fra toppen Hvordan arbeider styret og ledelsen med etikk og compliance?

Hvordan er tonen og handling fra toppen?

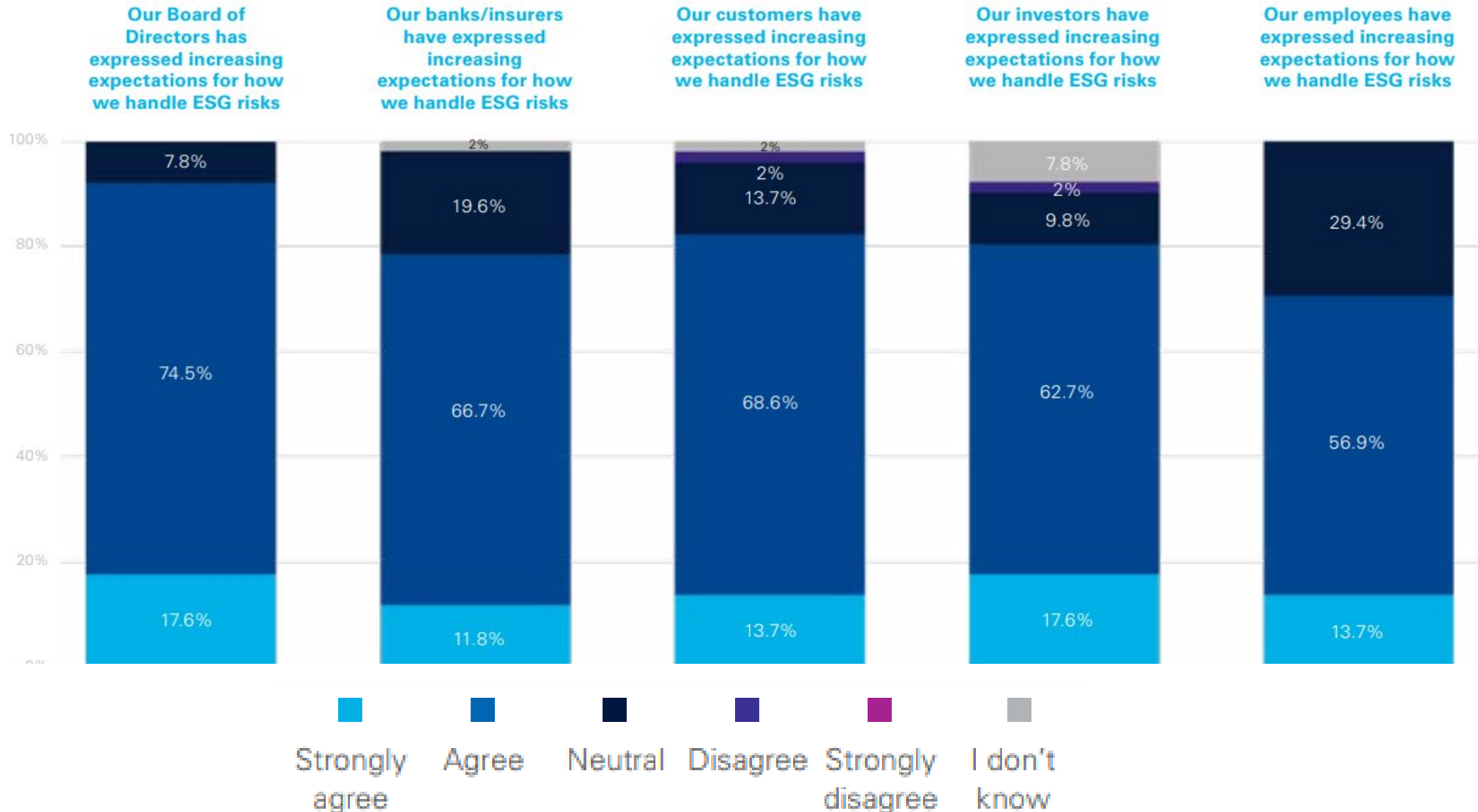
91% responded that the **Board of Directors has expressed increasing expectations** for how compliance and ESG risks are handled

87% of companies **regularly review and improve** their ethics and compliance program

77% responded that their company has **implemented key performance indicators** related to ethics and compliance

Modenhhet | 2023 Trend







02

Hva er de viktigste risikoene og hvordan arbeides det med risiko-kartlegging?

Hva anser virksomhetene som de viktigste compliance-risikoene?

Governance risks («G»)

Rank 2023	Rank 2022	Trend
01 Information security	2	↗
02 Cybercrime and extortion	1	↘
03 Conflict of interests	5	↗
04 Sanctions	4	↘
05 Personal data protection	6	↗
06 Bribery and corruption	3	↘

Social risks («S»)

Rank 2023	Rank 2022	Trend
01 Health & safety	1	→
02 Lack of diversity in leadership positions	N/A	N/A
03 Harassment/and or bullying	2	→
04 Working hours	6	↗
05 Discrimination	4	↘
06 Employment conditions	3	↘

Environmental risks («E»)

Rank 2023	Rank 2022	Trend
01 Energy consumption	3	↗
02 Negative impact on climate change	2	→
03 Greenhouse gas emissions	1	↘
04 Impact on ecosystem and biodiversity	4	→
05 Scarce natural resources	6	↗

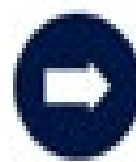
Hvordan jobbes det med risiko-kartlegging?

67% responded that their company performs **systematic** ethics and compliance risk assessments.

Only 48% answer that the risk assessments are **well documented**, distributed to **relevant stakeholders** and are being **used in strategic decisions**.

Around 80% of participating companies apply risk based integrity due diligence to their **3rd party relationships**

Modenhhet | Trend
2021- 2023



03

**Hvor modent er arbeidet med
forebyggende og avdekkende tiltak?**

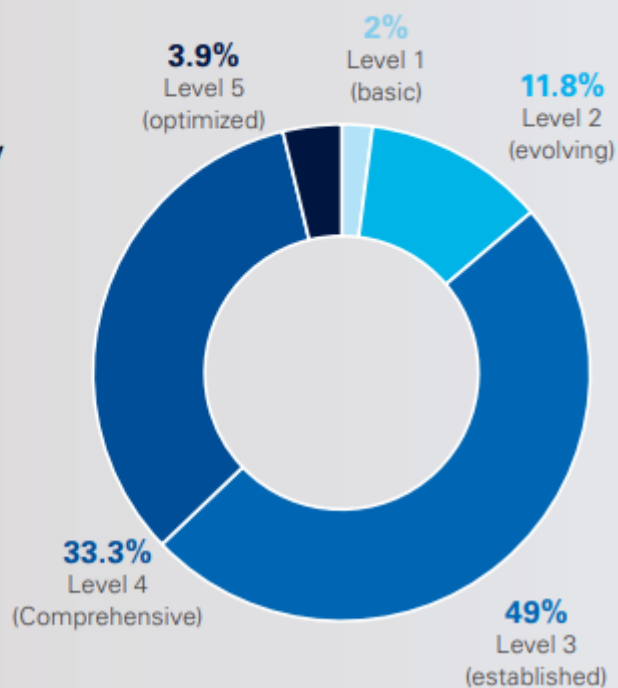


Hvor modent er virksomhetenes compliance-program?

Assuming a broad perspective, on a maturity scale from 1-5, where would you say that your company is with respect to ethics and compliance work?

The majority of the companies answer that they have an established/comprehensive compliance program.

The survey shows that the majority of the companies consider that their compliance program has a maturity level "3-4" out of 5. This aligns with the fact that the majority of the companies participating are large Nordic companies.



KPMG's Maturity Scale for Reference

Level 5 - Optimized: The work on compliance with external regulatory requirements and internal rules is systematic, efficient and well integrated at all levels of the organization in accordance with guidelines and best practice e.g., United States (US) Department of Justice (DoJ) Evaluation of Corporate Compliance Programs and the United Kingdom (UK) Bribery Act. The management and Board of Directors take an active role in reviewing and improving the compliance program. There is a strong focus on evaluation and learning across the organization. Digital tools are implemented to facilitate the collection and analysis of relevant company's data to support compliance risk management, monitoring and reporting activities and ensure traceability.

Level 4 - Comprehensive: The work on compliance with external regulatory requirements and internal rules is systematic and well integrated into all levels of the organization in accordance with guidelines and good practice, e.g. US DoJ Evaluation of Corporate Compliance Programs and the UK Bribery Act. The management and Board of Directors are involved in reviewing and improving the compliance program. There is a strong focus on evaluation and learning. Digital tools are to some extent implemented to facilitate the compliance work.

Level 3 - Established: Work on compliance with external regulatory requirements and internal rules is systematic and implemented at all levels of the organization in accordance with regulatory requirements and guidelines and good practice, e.g. US DoJ Evaluation of Corporate Compliance Programs and the UK Bribery Act. Digital tools are to some extent implemented to facilitate the compliance work.

Level 2 - Evolving: The compliance program has several key elements in place, but there are significant shortcomings. The activities are not systematic and well integrated at all levels of the organization. The program partly satisfies external regulatory requirements and guidelines. The maturity of some major disciplines are inadequate.

Level 1 - Basic: The compliance program is fragmented. There are significant deficiencies in governing documents and implemented processes. The program does not satisfy external regulatory requirements and guidelines within one or more significant subject areas.

Hvor modent er arbeidet med avdekkende aktiviteter?

Only 56% of the companies agree that their company has **targeted and efficient controls** in place to manage ethics and compliance risks.

12% answer that they have **not performed** any supplier-audits within ESG

83% respond that they have a well-functioning **whistleblowing system**

Modenhets | Trend

2021- 2023



KPMG studie av 100 virksomheters redegjørelse etter åpenhetsloven

KPMG har analysert 100 virksomheters redegjørelser og hvordan de rapporterer om sine aktsomhetsvurderinger lovens første virkeår.

Med enkelte unntak av god praksis, rapporterer de fleste virksomhetene at de har brukt mest tid på skrivebordsarbeid og **risikovurderinger**, og mindre tid på oppfølging av menneskerettigheter og anstendige arbeidsforhold **ute i feltet**, for dem dette angår.



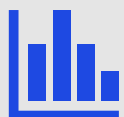
Andre observasjoner:



50 % dekket ikke faktiske brudd med anstendige arbeidsforhold eller menneskerettigheter. I 25 % av tilfellene var dette uklart.



Få virksomheter rapporterte om hvordan de har bidratt til gjenoppretting av brudd.



Få virksomheter rapporterte at de involverte interessenter i sine aktsomhetsvurderinger (f.eks. representanter for sårbare grupper).

04

Veien videre



Veien videre

Nordic companies should look to:



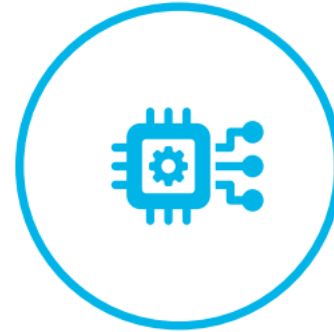
Increase **top management involvement**. Make the 1st line responsible and accountable for compliance; **empowerment and accountability should go hand-in-hand**



Align and integrate the ethics/ESG compliance risk & opportunity assessment processes with the **company's end-to-end strategy process**. E, S, and G risks are interconnected - do not work in silos



Establish **effective controls and conduct regular testing of effectiveness**. Learn from whistleblowing cases, identify the root causes



Follow up of **third parties** throughout the lifecycle, not only focusing on pre-engagement screening. Focus should be on **ceasing actual misconduct, identifying root causes and ensuring learning across the organization**



Move away from traditional 'compliance only' solutions by **implementing emerging technologies**

A day dedicated to the role of technology in compliance



Save the date! KPMG is hosting a Compliance Technology event and we are hoping that you will join us for a day of interesting conversations about the role of technology in compliance.

When: 26 September 2023, from 09:00 – 15:00

Where: Rebel, Universitetsgata 2, Oslo

Price: Free of charge



kpmg.com/socialmedia

Contact us:



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Siv. Ing. med Master & PhD i Telecom. Før hun begynte i KPMG i 2017, 23 års erfaring telekom- og olje & gass-industrien, herunder 5 år som Head of Compliance.

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