



# **RAMBOLL** **CURRENT TRENDS AND CHALLENGES WITHIN BUSINESS INTEGRITY**

**Christine Jøker Lohmann**

**Regional Compliance Manager Nordics**

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**RAMBOLL**

Bright ideas. Sustainable change.

An aerial photograph of a city, likely Stockholm, showing a dense urban landscape with a mix of historic and modern buildings, green spaces, and a river. The sky is blue with light clouds. A semi-transparent white box is overlaid on the lower left and center of the image, containing text.

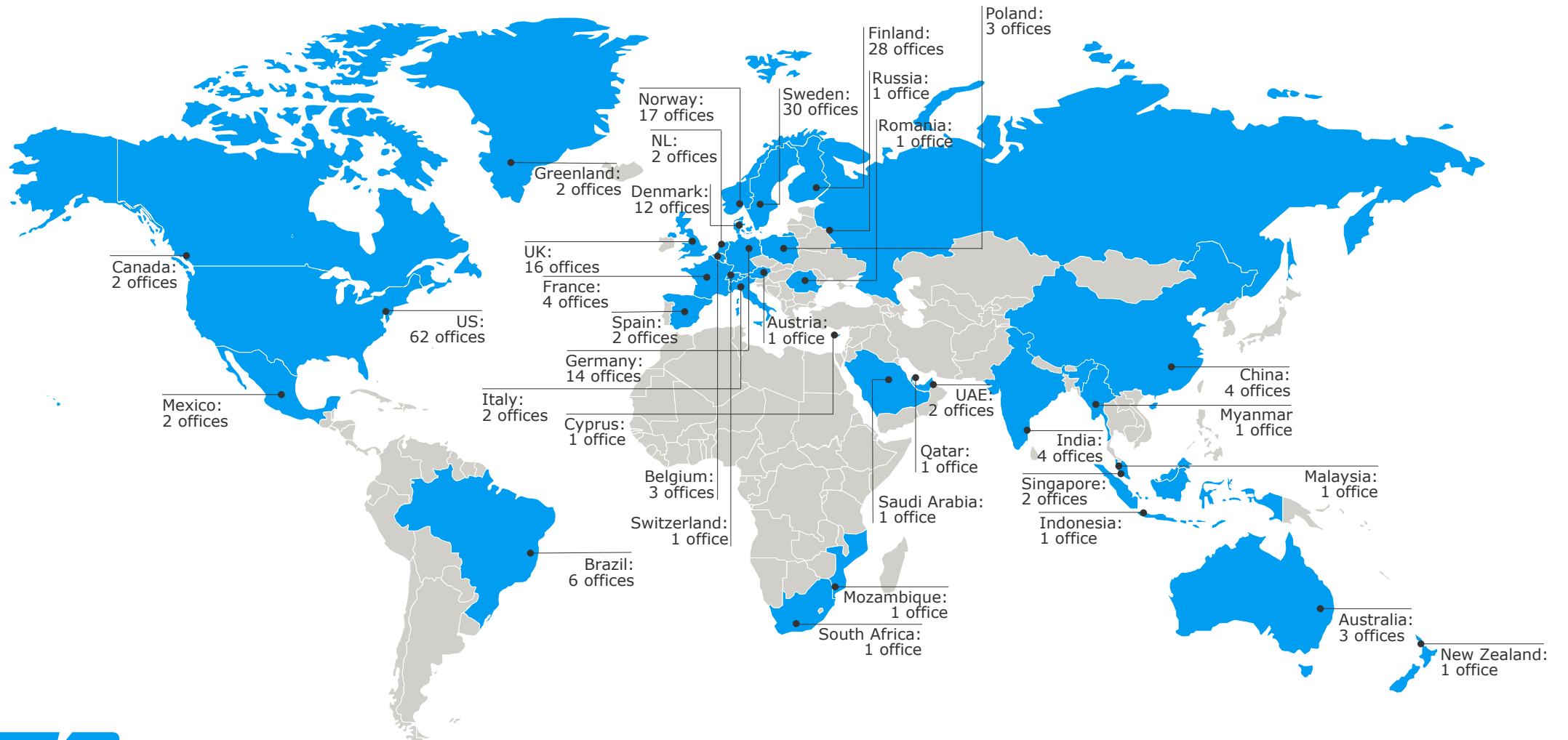
# OUR MISSION

Create sustainable  
societies where people  
and nature flourish

## RAMBOLL IN BRIEF

- Independent engineering, architecture and consultancy company
- Founded 1945 in Denmark
- 16,500 experts
- Present in 35 countries
- Particularly strong presence in the Nordics, the UK, North America, Continental Europe, Middle East and Asia Pacific
- EUR 1.9 billion revenue
- Owned by Rambøll Fonden – The Ramboll Foundation

# GEOGRAPHICAL FOOTPRINT



# OUR COMPLIANCE ACTIVITIES ARE DRIVEN BY INTERNAL AND EXTERNAL EXPECTATIONS AND REQUIREMENTS

RAMBØLL  
FONDEN

Legacy, Fundamentals & Commitments



Ramboll Group Strategy



*Best industry practice on anti-corruption*

Legislation & Client requirements



ISO Standards



*ISO 19600: Compliance management systems  
ISO 37001: Anti-bribery management systems*

Group Policies



*Code of Conduct, Global Compliance, Speak Up, Anti-Corruption, Data Privacy, International Sanctions*

Group Compliance

Leadership & Organisation



Policies & Controls



Risk Assessment



Training & Communication



Monitoring & Reporting



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# GLOBAL COMPLIANCE TRENDS IN LAWS & STANDARDS

## New EU Whistleblower Protection Directive

New EU Whistleblower Directive to be implemented in national laws in 2021. The Directive establishes **EU-wide minimum requirements** regarding:

- Providing for a high level of protection of persons reporting breaches of Union law, incl. strict confidentiality requirements.
- Protection against direct and indirect retaliation against reporter.
- Reporting channels, incl. opportunity for oral reporting.
- Feedback obligations to reporter within 3 months.

Expected to be implemented through Danish law and applicable to Ramboll December 2021.

## Updates to legal guidelines and standards

During 2020, US Department of Justice updated:

- 1. "Evaluation of Corporate Compliance Programmes":** The guidance describes specific factors that US prosecutors should consider in conducting an investigation of a corporation, determining whether to bring charges, and negotiating plea or other agreements.
- 2. US Foreign Corrupt Practices Act (FCPA) resource guide:** The guide provides companies detailed information about FCPA requirements and insight into DOJ and SEC enforcement practices.

**ISO 37301 on Compliance Management Systems** is an update of ISO 19600\* and will create a certifiable global benchmark for compliance programmes. It defines guidelines for compliance & integrity management programmes.

267 firms and individuals were debarred by the **World Bank** in 2020, compared to 155 in 2018. So far, in 2021, 12 firms or individuals have been debarred. Enforcement is increasing not only by national states.

## Corruption cases calls for holistic and robust compliance setup

Top five 2020 corporate FCPA cases ranked by size\*:

- Goldman Sachs Group, Inc. – \$3,321,388,000
- Airbus Group SE – \$2,091,978,881
- Novartis AG – \$346,725,000
- J&F Investimentos S.A. – \$285,363,591
- Vitol Inc. – \$135,000,000

Lessons learnt:

Main risks include **third party engagement** with public authorities.

While targeted companies are **headquartered in Europe or the US**, all misconduct has taken place outside these countries/regions.

Compliance risks in the tender phase while bidding holds **distinctive compliance risks**

Most **investigations take several years**

# EXTERNAL GLOBAL COMPLIANCE TRENDS AS KEY DRIVERS

## Digitalisation, digitalisation & more digitalisation

Digitalisation is a driver of change and lead to new ways to build our CSR, Sustainability and Compliance programme.

**Compliance departments will not continue to grow but will still be expected to expand the programme and be more efficient.**

Think smarter with technology and digitalisation to prevent, detect and respond incl.:

- Digital Third party risk screening
- Data analysis to prioritize activities
- Targeted E-learning
- Guidance available when in real life dilemmas on the ground
- Live Dashboard overview
- Data driven reporting

## Compliance & workplace culture

**Global Risk & Compliance Benchmark Report 2020** by Navex Global\*\* highlights a culture of trust and leadership buy-in as key drivers for strong compliance performance:

- The extent to which employees fear retaliation for speaking up is a strong indicator of the health of the organisation's culture. Similarly, the extent to which an organisation addresses retaliation is a sign of how well it understands and responds to the underlying factors contributing to its culture.
- Organisations with advanced compliance programmes are more likely to prioritise organisational compliance culture, recognising that cultures evolve on their own – in unintended directions - unless carefully tended.
- Senior management buy-in improves with programme maturity – and programme maturity is dependent on senior management buy-in.

## Covid-19 highlights future compliance trends

The past year has also from a compliance perspective been unpresidential. While new work patterns both inside and outside companies have changed, **risk patterns have shifted to.**

But some of these risks will be “**new normal**” and affect our business in the long run incl.:

- Compliance fundamentals in focus
- Greater awareness of the legal impact of interruption to operations
- Increased usage of business associates instead of expensive travelling
- New markets leading to new risks to become familiar with
- Check-in phone calls/compliance coffee
- Increase in digitalisation and data analysis
- Model for remote compliance reviews
- Increase in online training

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Christine Jøker Lohmann  
Regional Compliance Manager Nordics  
Phone: +45 5161 1588  
E-mail: [chjl@ramboll.com](mailto:chjl@ramboll.com)