

Compliance Management Systeme der nächsten Generation

Dr. Nicolai Behr und Marcel Wagner



BUREAU VAN DIJK

**Baker
McKenzie.**

Compliance Cockpit

Start CC









FINANCIAL
TIMES

INNOVATIVE LAWYERS2018

WINNER

What Compliance Management Systems often look like

Central compliance team



Policies



Trainings



What Compliance Management Systems often look like

Local compliance officer



Monitoring



Overview



What you should be doing

Step 1

Collect

Step 2

Translate

Step 3

Analyze

Step 4

Visualize

From information to smart data

collect all relevant
information on the status
of your compliance
program, risk exposure
and compliance culture
from multiple sources

analyze the effectiveness
of your compliance
program

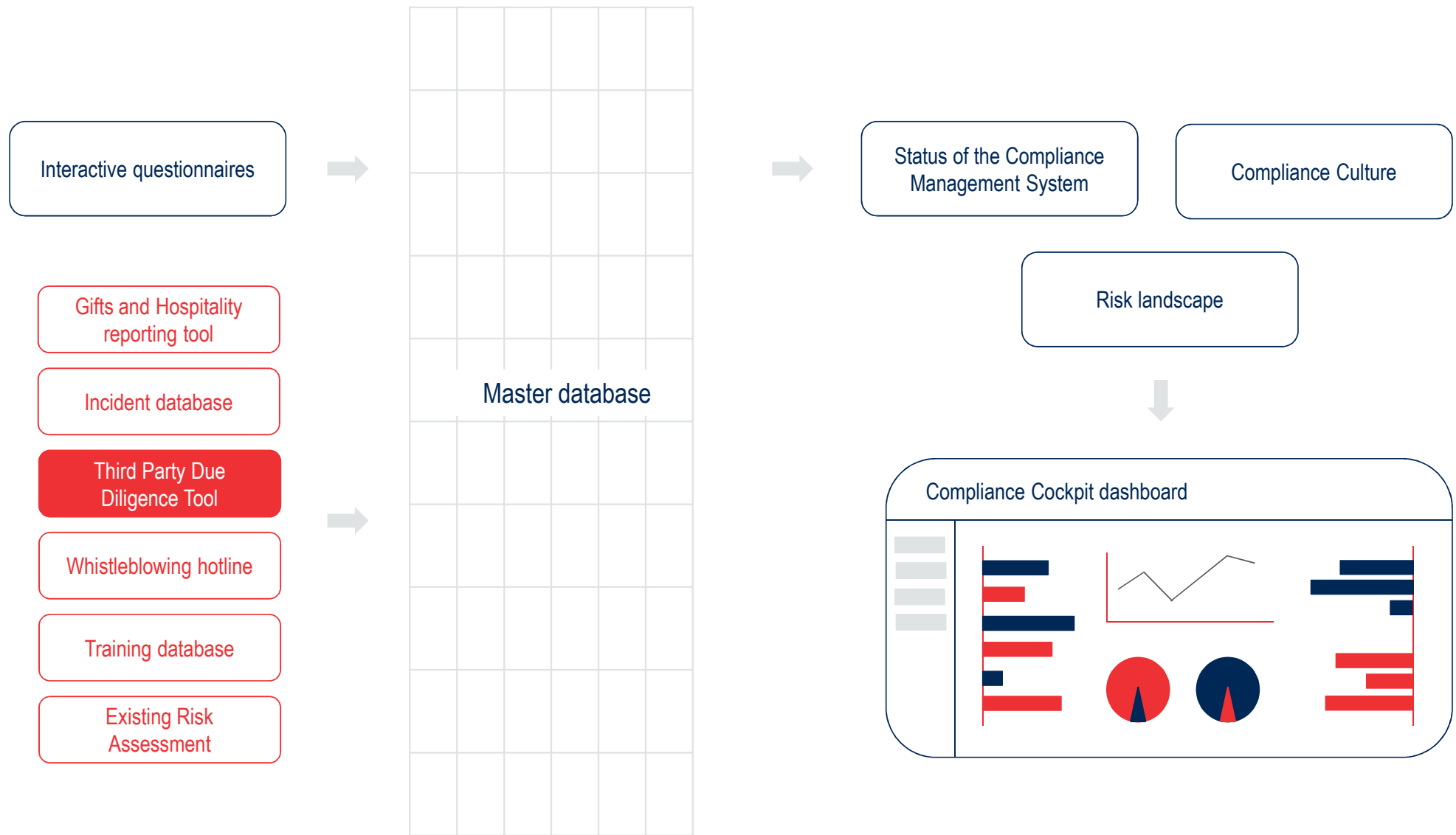
better allocate your
(usually scarce)
resources

via the Compliance Cockpit, you can

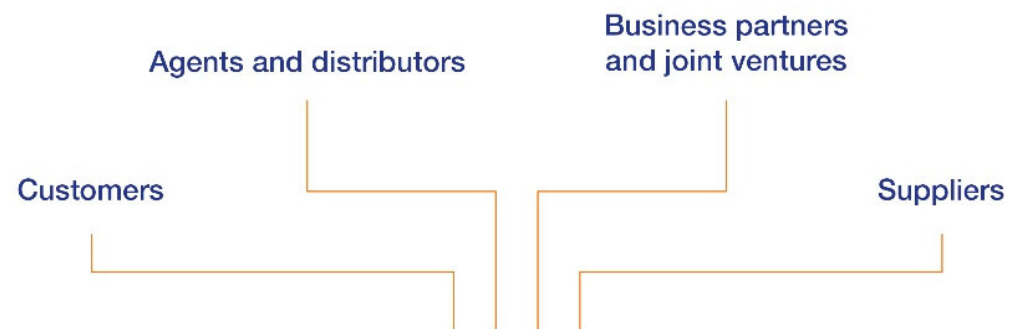
present the results in an
interactive dashboard

assess whether you
comply with international
compliance standards

track the development of
your compliance
program, risk exposure
and compliance culture
over time



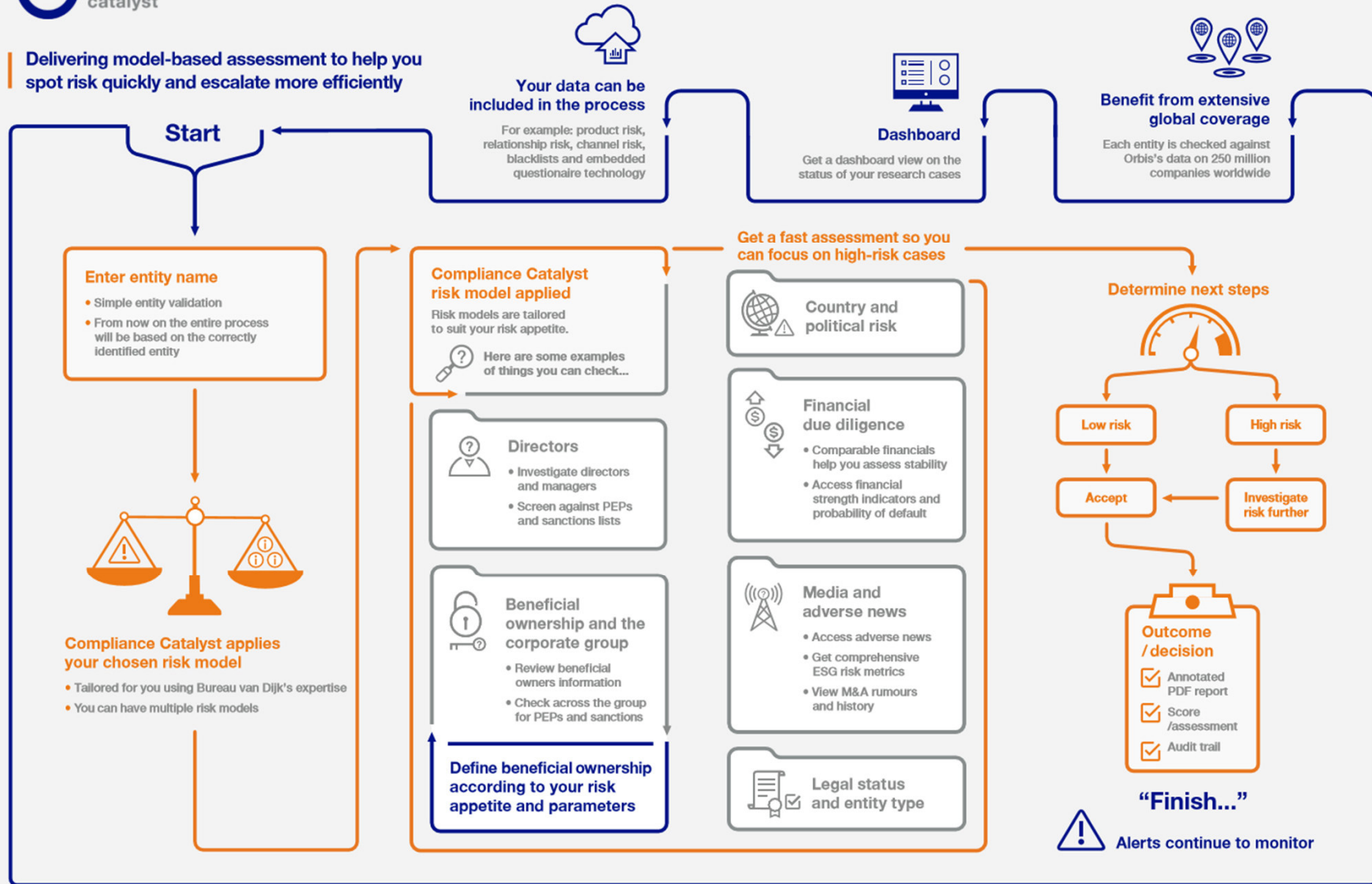




For fast, streamlined due diligence and onboarding



Delivering model-based assessment to help you spot risk quickly and escalate more efficiently



NUEVA INDUSTRIA DE GANADEROS DE CULIACAN SA DE CV

HIGH
IN PROGRESS**NUEVA INDUSTRIA DE GANADEROS DE CULIACAN SA DE****CV** - CULIACAN, MEXICO

GUO: SRA. MARIA TERESA SAMBADA NIEBLA

BvD ID number MXNIG8802029Y7

Client ID

Engagement ID

Created: DEUCOMPPatrick (31/01/2017 10:24 AM) - Status: In progress

Outcome

Rating: **High**
Status: **In progress**Score: **100**

Evaluation by: Decision model (31/01/2017 10:24 AM)

Modification by: Decision model (31/01/2017 10:24 AM)

Add a summary

Comments [Add a comment/attachment\(s\)](#) [Refresh automatically attached file\(s\)](#)

Due to an internal problem, the Orbis report could not be attached. 31/01/2017 10:24:23 AM

Processes

Process	Rating	Score	Process details	Comment(s)/ Attachment(s)	Evaluation by	Last edited
PEPs and Sanctions	High	100	Subject source list(s): High	No	Decision model	31/01/2017 10:24 AM
Client type	Low	25	Unlisted. Regulation unknown.	No	Decision model	31/01/2017 10:24 AM
Directors	Low	0	1 manager/staff member has potential enforcements.	No	Decision model	31/01/2017 10:24 AM
Beneficial owners	High	50	1 BO has potential sanctions.	No	Decision model	31/01/2017 10:24 AM
Corporate group risk	High	100	Subject source list(s): High risk. 1 other risk factor(s) identified.	No	Decision model	31/01/2017 10:24 AM
News	Low	0	No negative news.	No	Decision model	31/01/2017 10:24 AM
Controlling shareholders	High	50	1 CSH has potential sanctions.	No	Decision model	31/01/2017 10:24 AM

Decision model : Standard demo company model

Once you have made your choice, the Catalyst reviews the business partner according to your individual risk appetite / model.

A decision model consists of various processes.
Think of them like bullet points on your compliance check list

NUEVA INDUSTRIA DE GANADEROS DE CULIACAN S.A. DE C.V. (1105351)

PrimaryName	N/A
Aliases	DORA PASTEURIZA DE LECHE SANTA MONICA
	INDUSTRIAS DE GANADEROS S.A. DE C.V.
	LECHERIA SANTA MONICA
	SANTA MONICA DAIRY
Category	Sanction List
Sub Category	N/A
Level	N/A
Data source	US-U.S. Office of Foreign Asset Control (OFAC) - SDN List
Primary Country	MX
Description	Added to OFAC's SDN List
National ID	N/A
Other ID	NIG-8802029- Y7
Passport #	N/A
Last Updated	15/07/2016

Additional Information

NUEVA INDUSTRIA DE GANADEROS DE CULIACAN S.A. DE C.V. (a.k.a. DORA PASTEURIZA DE LECHE SANTA MONICA; f.k.a. INDUSTRIAS DE GANADEROS S.A. DE C.V.; a.k.a. LECHERIA SANTA MONICA; a.k.a. SANTA MONICA DAIRY), Calle/Boulevard Doctor Mora 1230, Colonia Las Quintas, Culiacan, Sinaloa 80060, Mexico; Carretera Los Mochis Topolobampo, KM. 5.2, Los Mochis, Sinaloa, Mexico; Avenida Francisco Villa Norte 135, Colonia Ninos Heroes, Salvador Alvarado, Sinaloa 81400, Mexico; Carretera La Cruz KM 15 S/N, Colonia Arroyitos, La Cruz, Sinaloa 82700, Mexico; Chamizal S/N, La Cruz, Sinaloa 82700, Mexico; Carretera Internacional al Norte KM 1.5, 1207, Colonia Ejido Venadillo, Mazatlan, Sinaloa 82129, Mexico; Plaza Azul S/N, Colonia Las Brisas, Tecuala, Nayarit, Mexico; Calle Prolongacion Morelos y Matamoros S/N, Colonia Benito Juarez, Escuinapa, Sinaloa 82400, Mexico; Matamoros 5, Escuinapa, Sinaloa 82478, Mexico; Carretera Internacional 1845, Bodega 8 y 10, Colonia Zona Industrial 2, Ciudad Obregon, Sonora 85065, Mexico; Calle Sauces 384, Colonia Del Bosque, Guasave, Sinaloa 81020, Mexico; Calle Federalismo 2000, Colonia Recursos Hidraulicos, Culiacan, Sinaloa 80060, Mexico; Carretera Augustin Olachea Local 30, Colonia Pericues, La Paz, Baja California Sur 23090, Mexico; Avenida Vallarta 2141, Colonia Centro, Culiacan, Sinaloa 80060, Mexico; Carretera A Navolato, Colonia Bachigualato, Culiacan, Sinaloa 80060, Mexico; Calle Tomate 10 Bodega 34Y5, Colonia Mercado Abastos, Culiacan, Sinaloa 83170, Mexico; Carretera A Topolobampo 5, Colonia Ninos Heroes, Ahome, Sinaloa 81290, Mexico; Avenida Xicotencalth # 1795, Colonia Las Quintas, Culiacan, Sinaloa 80060, Mexico; Calle Central Local A10, Colonia Mercado Abastos, Cajeme, Sonora 85000, Mexico; Calle Jose Diego Abad 2923, Colonia Bachigualato, Culiacan, Sinaloa 80140, Mexico; R.F.C. NIG-8802029- Y7 (Mexico) [SDNTK]

Individual sources

Source	Name	Country
Consolidated Sanctions List	Nueva Industria de Ganaderos de Culiacan S.A. De C.V. (1963796)	Mexico

Relationships

Associated individuals	ZAMBADA GARCIA, Ismael (Associate)
	BUENO GARCIA, Santos (Associate)
	NIEBLA CORDOZA, Rosario (Associate)
	PEREGRINA TOBOADA, Jose Antonio (Associate)
	ZAMBADA NIEBLA, Maria Teresa (Associate)
	ZAMBADA NIEBLA, Midiam Patricia (Associate)
	ZAMBADA NIEBLA, Modesta (Associate)
	ZAMBADA NIEBLA, Monica del Rosario (Associate)
	ZAMBADA NIEBLA, Vicente (Associate)

Source link(s)

https://www.treasury.gov/resource-center/sanctions/Programs/Documents/narco_sanctions_kingpin.pdf
https://www.treasury.gov/resource-center/sanctions/Programs/Documents/20130730_sinaloa_network.pdf
<http://www.treasury.gov/ofac/downloads/sdnlist.txt>
<http://www.treasury.gov/resource-center/sanctions/OFAC-Enforcement/pages/20070517.aspx>
http://www.treasury.gov/resource-center/sanctions/Programs/Documents/zambada_chart_051707.pdf
<http://www.treasury.gov/press-center/press-releases/Pages/hp410.aspx>
http://www.treasury.gov/press-center/press-releases/Documents/2_Analysts_Notebook_8-13-0019_Sinaloa_Desip_Timeline%20_public_releas.pdf

Reported addresses

Addresses	City	State/Province	Country	Postal Code
Carretera A Topolobampo 5	Ahome	Sinaloa	MX	81290
Calle Central Local A10	Cajeme	Sonora	MX	85000
Carretera Internacional 1845	Ciudad Obregon	Sonora	MX	85065
Carretera A Navolato	Culiacan	Sinaloa	MX	80060
Avenida Vallarta 2141	Culiacan	Sinaloa	MX	80060
Calle Federalismo 2000	Culiacan	Sinaloa	MX	80060
Avenida Xicotencalth # 1795	Culiacan	Sinaloa	MX	80060
Calle Jose Diego Abad 2923	Culiacan	Sinaloa	MX	80140
Calle Tomate 10 Bodega 34Y5	Culiacan	Sinaloa	MX	83170
Calle/Boulevard Doctor Mora 1230	Culiacan	Sinaloa	MX	80060
Calle Prolongacion Morelos y Matamoros S/N	Escuinapa	Sinaloa	MX	82400
Matamoros 5	Escuinapa	Sinaloa	MX	82478
Calle Sauces 384	Guasave	Sinaloa	MX	81020
Carretera La Cruz KM 15 S/N	La Cruz	Sinaloa	MX	82700
Chamizal S/N	La Cruz	Sinaloa	MX	82700
Carretera Augustin Olachea Local 30	La Paz	Baja California Sur	MX	23090
Carretera Los Mochis Topolobampo	Los Mochis	Sinaloa	MX	N/A
Carretera Internacional al Norte KM 1.5	Mazatlan	Sinaloa	MX	82129
Avenida Francisco Villa Norte 135	Salvador Alvarado	Sinaloa	MX	81400
Plaza Azul S/N	Tecuala	Nayarit	MX	N/A

When reviewing, one is being presented all relevant information one needs in order to come to a decision and understand why someone or an organisation is categorized as it is.

NUEVA INDUSTRIA DE GANADEROS DE CULIACAN SA DE CV

Evaluation

Rating: **Low** Score: **0** Evaluation by: *Decision model (31/01/2017 10:24 AM)*

1 manager/staff member has been matched in the WorldCompliance database, as being present on enforcement list(s). However the match is not confirmed.
Filters have been applied in the search for WorldCompliance records.

[Add a comment/attachment\(s\)](#)

Director

Boards & committees
No data available

Management & staff

1 of 1 pages

Score	Name	Original job title	Body/Dep	Source	Country	Date of birth	PEP /SOE	Source Lists	Verified
0	Mr Sergio Lopez	- Jefe de Compras	Sales,Proc	IS	n.a.		0	3	<input type="checkbox"/>
0	P262064715								
0	Ms Angelica Villegas	- Contadora General	FinAcc	IS	n.a.		0	0	<input type="checkbox"/>
0	P262064712								

Additional directors (user input)
No data available

[Add a new director](#)

Mr Sergio Lopez match(es)

WorldCompliance match(es) for SERGIO LOPEZ*

Restrict the selection to the entities located in **All countries**

?	X	✓	M	Name	Country	Category	SubCategory	Date	Matched by
<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Sergio Lopez (326332)	MX	Enforcement	Most Wanted	22/02/2015	Automated match
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Sergio Lopez (5764057)	US	Enforcement	Drug Trafficking	19/02/2015	Automated match
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	Sergio Lopez (7633934)	US	Adverse Media	Drug Trafficking	02/11/2016	Automated match

Please perform an additional search for more results.

First name Second names or initials Last name

Once you have done that for entity itself, you do that for the actual people involved .

Octavio HOLGUIN (326332)



PrimaryName	N/A
Aliases	Lopez, Sergio
NickNames	Delao, Tavo
Category	Enforcement
Sub Category	Most Wanted
Level	N/A
Data source	US-U.S. Marshalls
Date(s) of birth	August 12, 1968
Place of birth	Mexico
Primary Country	MX
Case	Wanted by the U.S. Marshals for drug trafficking - December 08, 1998
National ID	N/A
Other ID	N/A
Passport #	N/A
Last Updated	22/02/2015

Additional Information

SEX: Male
RACE: White
DATE OF BIRTH: August 12, 1968
[View more information](#)

NUEVA INDUSTRIA DE GANADEROS DE CULIACAN SA DE CV

Evaluation

Rating: **High** Score: **50** Evaluation by: *Decision model (31/01/2017 10:24 AM)*

1 Beneficial Owner has been matched in the WorldCompliance database, as being present on sanction list(s). However the match is not confirmed.
Filters have been applied in the search for WorldCompliance records.

[Add a comment/attachment\(s\)](#)

Beneficial owner

Beneficial owner status: 1 beneficial owner.

→ Current definition of the BO: path of min 25.00% at first level, minimum 25.00% at further levels, incl. top level individuals with unknown percentage or with min 25.00% (25.00% at each level) ?

List of beneficial owners	Country	Distance	PEPs	Source lists	Verified
1. SRA. MARIA TERESA SAMBADA NIEBLA	n.a.	1	0	2	<input type="checkbox"/>

Path to the beneficial owners and other ultimate beneficiaries

	Country	Direct %	Total %	Source	Date
1. SRA. MARIA TERESA SAMBADA NIEBLA	n.a.	MO	n.a.	IS	10/2016
NUEVA INDUSTRIA DE GANADEROS DE CULIACAN SA DE CV	MX				

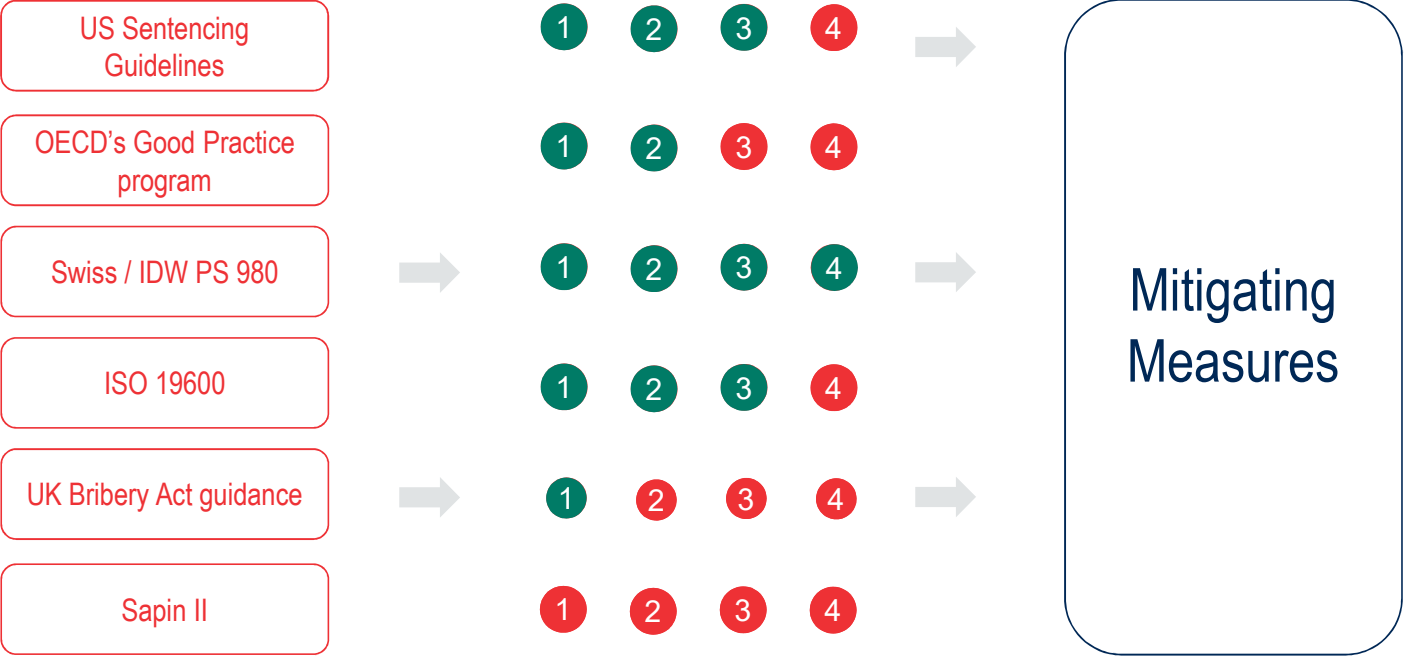
Additional beneficial owners (user input)

[Add a beneficial owner](#)

And the beneficial owner of course.



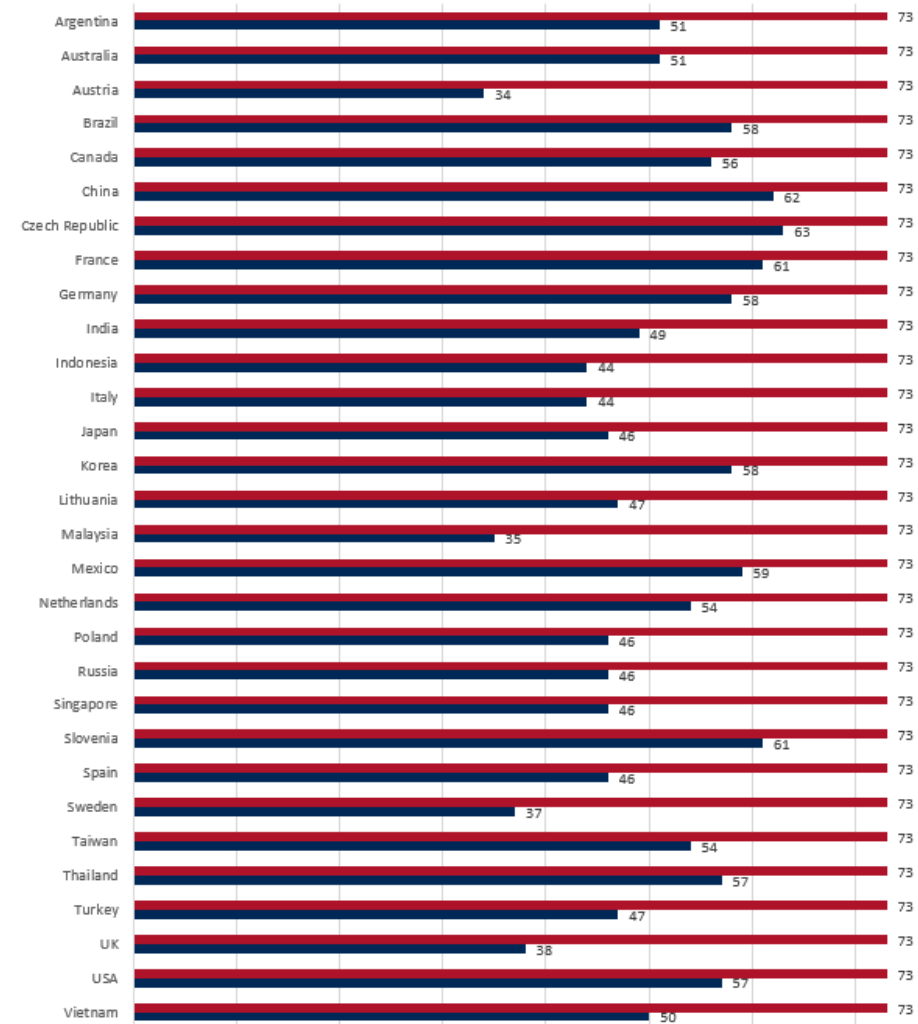
Status des Compliance Management Systems



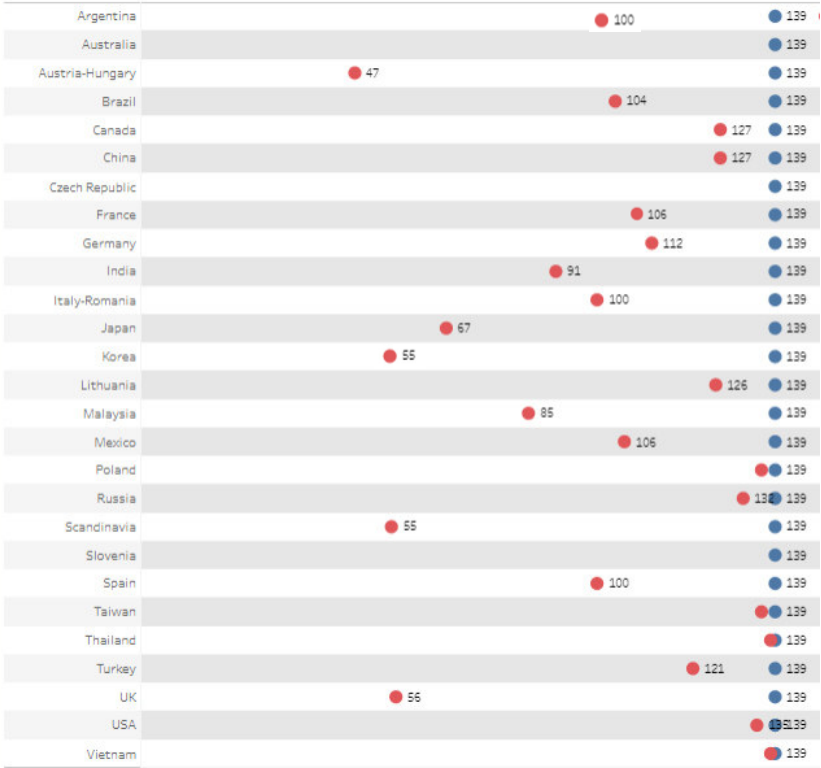
	Argentina	Australia	Austria	Brazil	Canada	China	Czech Republic	France	Germany	India	Indonesia	Italy	Japan	Korea	Lithuania	Malaysia	Mexico
1 - Leadership																	
Management Awareness																	
Compliance training of management																	
Compliance regular topic in management meetings																	
Organization																	
Compliance roadmap																	
Exchange on compliance in management																	
Institution for information exchange on compliance																	
Part-time LCO's main function																	
Policy compliance functions																	
Regularity of information exchange																	
Time of LCO for compliance																	
Reporting																	
Ad-hoc reporting to senior management																	
Reporting LCO to senior management																	
Rules on information on compliance to supervisory body																	
Tone from the top																	
Frequency of Tone from the Top																	
2 - Risk Assessment																	
R5 - Procurement																	
Dual-supply strategy																	
Supplier four-eye principle																	
3 - Standards and Controls																	
Policies																	
Policies Assessment of legal requirements for policy implementation																	
Policies Code of Conduct																	
Policies Col																	
Policies Competition Law																	
Policies Distributors																	
Policies Entertainment																	
Policies Fraud																	
Policies GEH																	
Policies on intranet																	
Policies Procurement																	
Policies Public officials																	
Policies Travel Expenses																	
Receipts for distribution																	
Distribution of Compliance Guidelines documented																	
R1 - Contracts																	
Compliance clause in template																	
Contract filing system																	
Contract templates																	
R2 - Third parties																	
BPDD process																	
BPDD process type																	
Retention of BPDD documentation																	
R4 - Sales																	

[illegible]

Status of the Compliance Management System



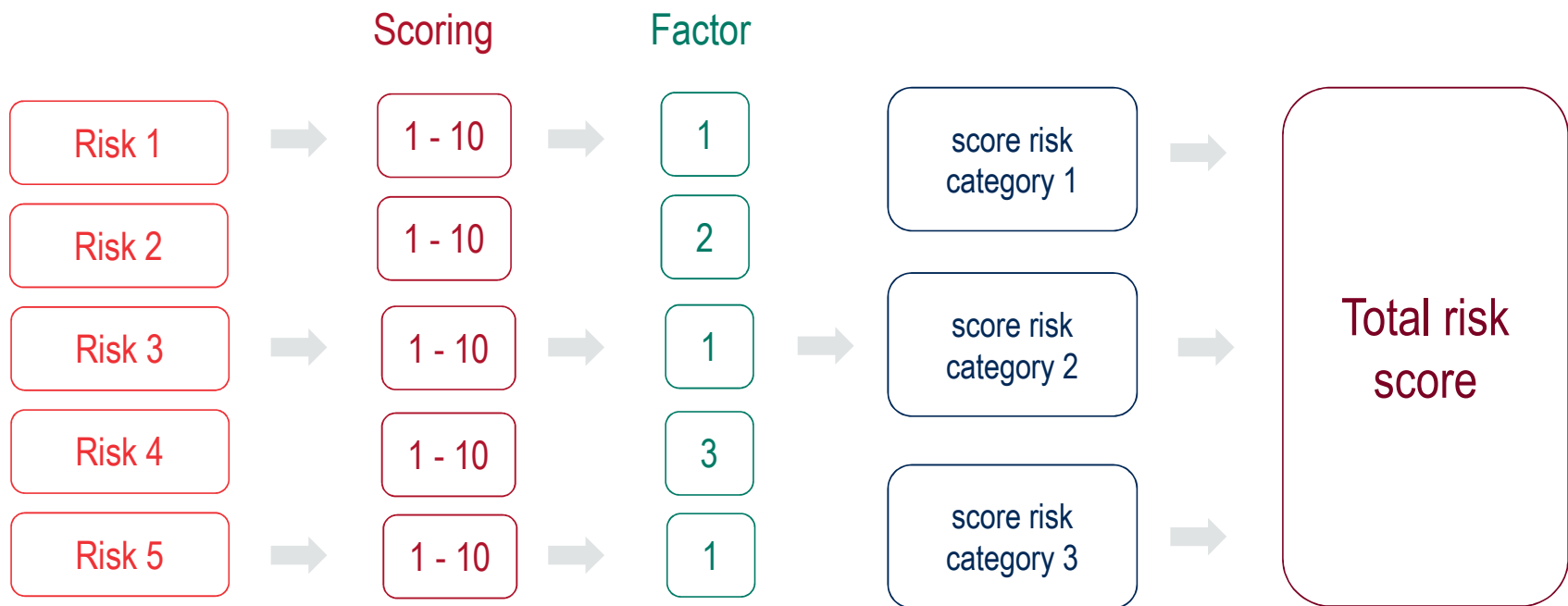
Status of CMS



Percentage of Implementation



Risk landscape

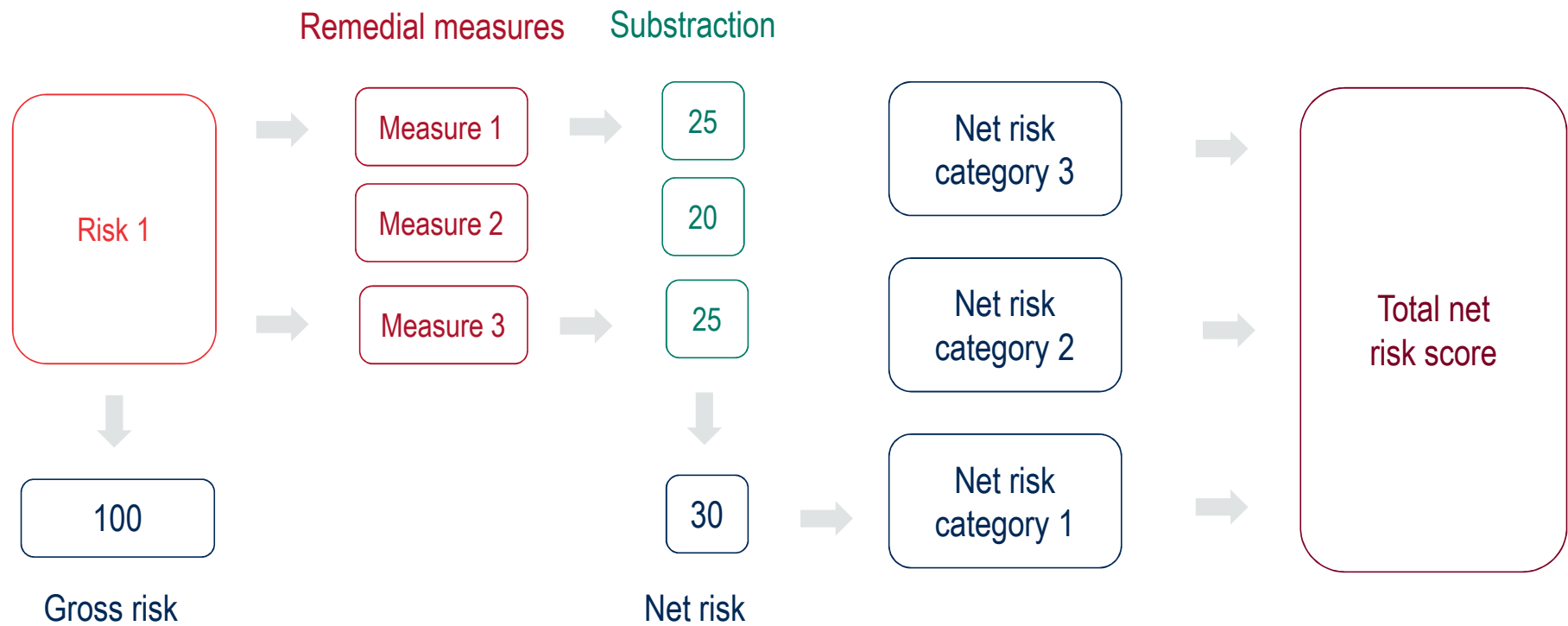


	R1 - Contracts	R2 - Third parties	R3 - Public Officials	R4 - Sales	R6 - Competition	R7 - Payment structure	R9 - Gifts, hospitality, sponsoring, donations	R10 - Conflicts of Interest	R11 - Money Laundering	R12 - Compliance History	Total Score
Argentina	0	0	0	6	0	0	2	0	0	0	8
Australia	0	2	0	0	6	0	4	0	0	0	12
Austria	2	6	0	6	6	6	2	10	0	0	38
Brazil	2	6	0	0	6	0	6	0	4	0	24
Canada	2	2	4	8	6	6	6	0	2	0	36
China	2	6	10	6	10	0	6	0	0	10	50
Czech Republic	2	6	0	10	10	0	2	2	0	0	32
France	2	0	0	0	10	0	6	0	0	0	18
Germany	2	10	4	0	10	6	6	0	2	6	46
India	2	6	4	8	6	0	10	0	0	4	40
Indonesia	6	6	0	6	0	0	2	0	0	4	24
Italy	0	6	0	6	10	0	10	10	0	0	42
Japan	6	8	0	6	10	0	8	0	0	0	38
Korea	0	2	4	0	0	0	6	0	0	2	14
Lithuania	8	6	0	6	6	6	2	0	0	0	34
Malaysia	0	8	10	6	6	0	10	0	0	0	40
Mexico	2	4	0	0	0	0	2	2	0	0	10
Netherlands	8	8	0	6	6	6	4	0	4	4	46
Poland	2	6	0	0	6	0	2	4	0	0	20
Russia	8	10	4	0	10	0	2	0	0	0	34
Sweden	10	8	0	6	6	10	4	0	0	0	44
Singapore	10	8	4	6	6	0	8	0	0	6	48
Slovenia	2	6	4	6	0	6	8	0	2	0	34
Spain	0	10	4	0	6	10	8	0	4	0	42
Taiwan	2	4	4	0	0	6	4	4	0	0	24
Thailand	2	6	0	0	0	0	4	0	0	2	14
Turkey	2	2	0	6	6	6	2	0	0	0	24
UK	10	8	0	0	6	10	2	0	0	0	36
USA	2	6	4	8	10	0	10	0	0	10	50
Vietnam	0	6	4	0	0	6	4	0	0	0	20

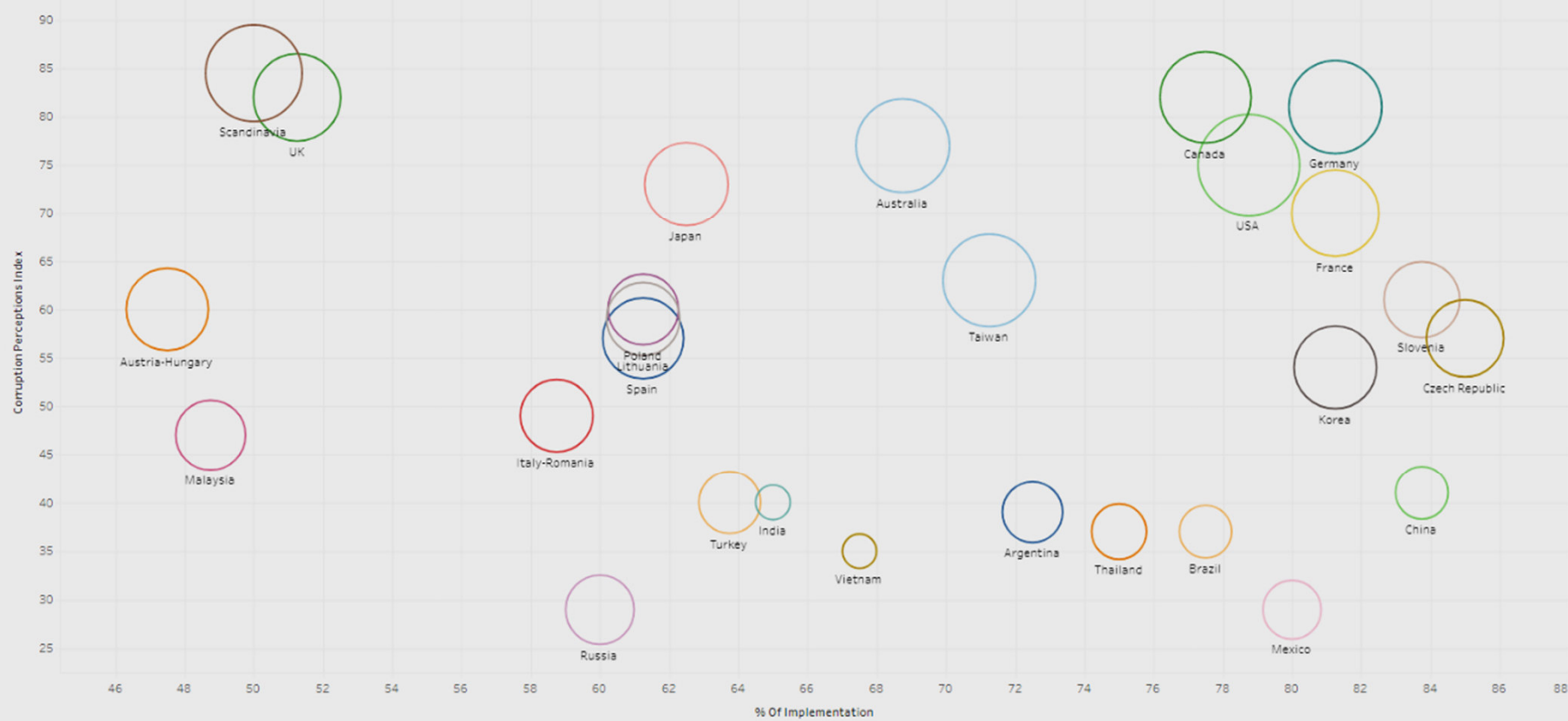
Risk Landscape Bar



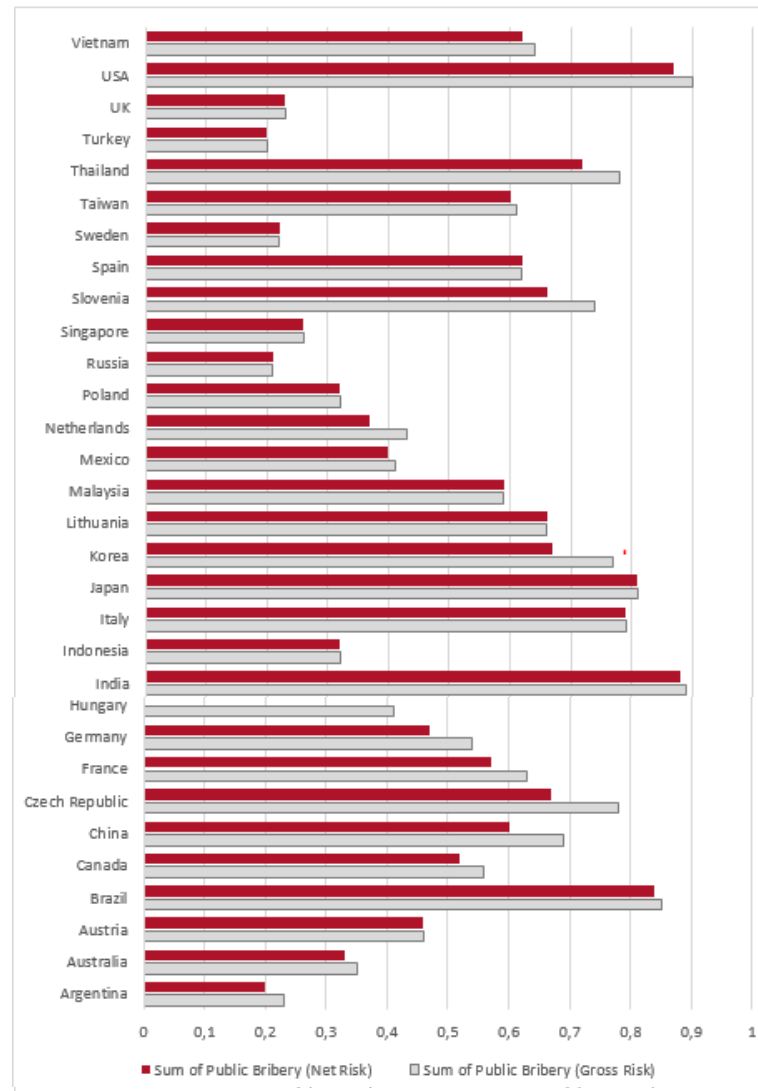
gross to net

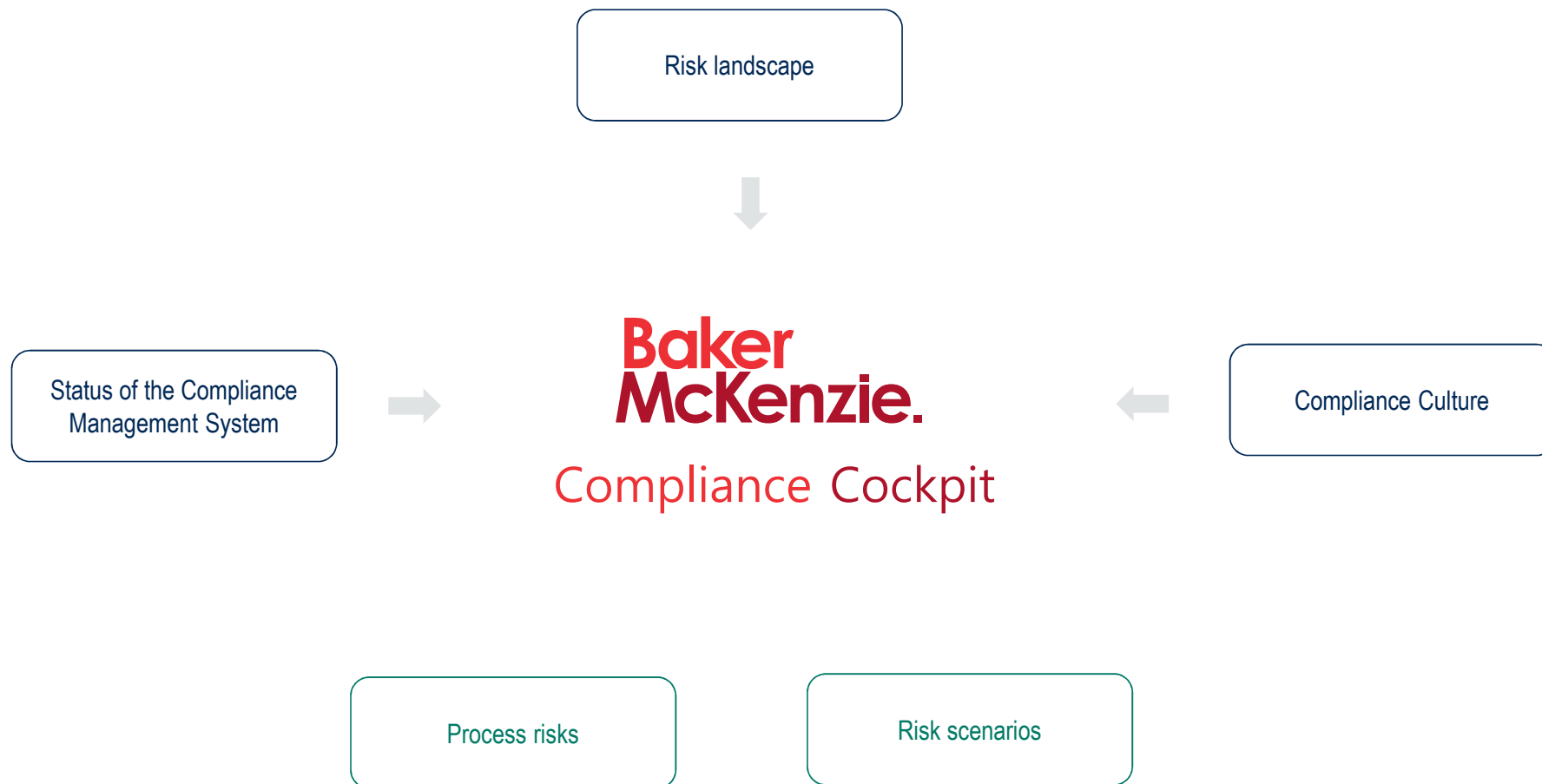


Corruption Perceptions Index vs % of CMS Implementation



Public bribery (gross - net comparison)





**Baker
McKenzie.**

Compliance Cockpit