The gift of simplicity
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2009-Feb-04 | “Simplifying rules and regulations is one of the most important requests that we were able to glean from the results of the employee survey on compliance. The first visible measure is this new set of guidelines for gifts and hospitality,” said Chief Compliance Officer Andreas Pohlmann. “This is not about softening rules or standards, but about making working with them less complex and more user friendly.”

Less is more The guideline is now limited to a few basic requirements and clearly defined rules of conduct. For example, based on a risk assessment it was possible to limit the approval and documentation rules that previously required a great deal of time and resources to implement. The guideline’s formerly detailed rules have been bundled into a clear, easy-to-use catalog of questions and answers, providing a practical guide for implementation.

Supervisor’s approval no longer needed Until now, time-consuming approval processes represented one of the main difficulties of implementing the rules. “Supervisory approval for gifts and dinner invitations is no longer needed. Instead, the employee can use a scorecard to simply and quickly determine whether they can offer a gift or make a dinner invitation, or whether they should first consult with the appropriate compliance officer,” says Flavio Bertoli, an attorney with Compliance Legal who is responsible for the project. Approval will continue to be needed for invitations to entertainment events and for accepting payment of travel and lodging costs. But the approval process is now mapped out in a tool called Approve it. This tool is a component of the Compliance Helpdesk and conveniently, intuitively and rapidly guides the applicant through all the points to be considered. The application is then automatically sent to the appropriate compliance officer, who either grants approval directly or - if that is not yet possible - provides helpful tips on how to proceed.