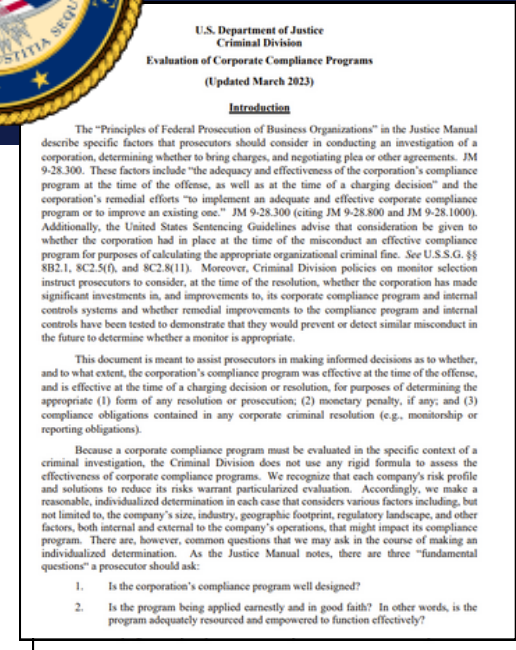


FRONT AND CENTER: RISK ASSESSMENT



01 Is the corporation's compliance program well designed?

02 Is the program adequately resourced and empowered to function?

03 Does the corporation's compliance program work in practice?

Risk Assessment

Policies & Procedures

Training & Communication

Reporting & Investigations

Third Party Management

Mergers & Acquisitions

✓ Process, methodology & metrics

✓ Risk-tailored resource allocation

✓ Updated and revised

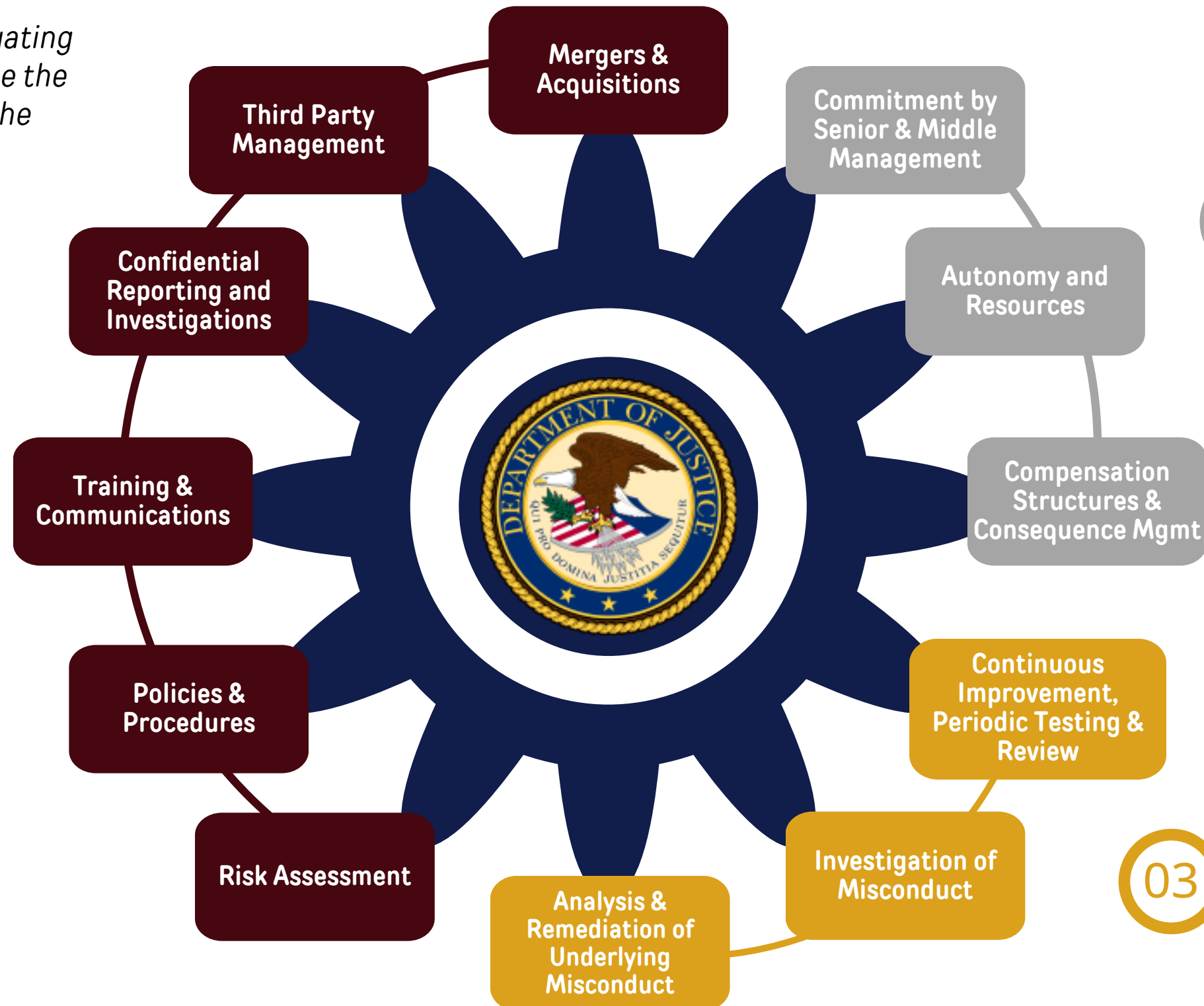
✓ Lessons learned

STEERING THROUGH THE DOJ GUIDANCE



The Justice Manual lists three 'fundamental questions' a prosecutor should ask when evaluating the effectiveness of a compliance program. Use the wheel to 'steer' through these questions and the associated sections of the guidance:

01 Is the corporation's compliance program well designed?



02 Is the program adequately resourced and empowered to function?

03 Does the corporation's compliance program work in practice?