

## CEP Magazine – January 2020 Meet Raj S. Kuppusamy: Raising the global ethical bar

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Raj S. Kuppusamy, CCEP-I, Head of Compliance for Sapura Energy Berhad in Seri Kembangan, Malaysia

Raj Kuppusamy (raj.kuppusamy@sapuraenergy.com) was interviewed by Adam Turteltaub (adam.turteltaub@corporatecompliance.org), Vice President, Strategic Initiatives & International Programs at SCCE & SCCE.

**AT:** You had a substantial career in legal. What led you to move over to compliance?

**RK:** I started off my career in Kuala Lumpur, Malaysia, as an educator in the local law colleges. Teaching remains my passion in life, and little did I realize that I would have the opportunity again in my compliance role.

I was called to the Malaysian Bar in 2001 after I completed my chambering at Zaid Ibrahim & Co. Soon after, I left the legal practice in 2002 for the oil and gas industry, serving various organizations for almost 20 years, including Carigali Hess, Kencana Petroleum, and, currently, Sapura Energy. In the current organization, I started as a sectional head leading a division in the legal department. In that role, apart from the standard duties managing legal matters within the group, my team supported the proposal team with bids and specialized in strengthening processes for the growing supply chain division. Working on multiple critical projects enriched me with firsthand experience in identifying crucial challenges vendors face in meeting our terms and conditions, formulating mechanisms into processes and policies to manage these challenges, and minimizing legal risk to the organization. I also worked on international litigation assignments in several countries that allowed me to engage with varied environments and cultures. The advantage I had working closely with supply chain to carry out due diligence and ensure compliance with all outcomes, including third parties/vendor screening, set me apart from other candidates for this compliance role.

This diverse exposure, as it turned out, formed the bedrock for assuming a compliance role that is not merely strict to the letter but also progressive enough for business to operate within sound regulatory, legal, and operational requirements. I have since built a customized compliance program and rolled out training and awareness programs globally for the group in several countries.

**AT:** What were some of the things you thought you knew, but found out you didn't, when you moved into compliance?

**RK:** In the last 10 years, corporations have begun to implement ethics programs even more strongly than before within their organizations, with the multinational corporations leading the way. Looking through narrow lenses, compliance may appear as just crafting a code of conduct and ensuring all employees sign off on the code—and the job's done!

I soon realized that the breadth of compliance covered data privacy, information management, trade compliance, integrity checks, anti-money laundering, anti-corruption, IT security, and even compliance at an international level vis-à-vis sanctioned countries.

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