

The Complete Compliance and Ethics Manual 2023

Appendix 4-A: Compliance and Ethics Program Self-Assessment Questions

CATEGORY	SUB-CATEGORY	TOPIC	ASSESSMENT QUESTION
Program design	Risk Assessment	Frequency	Is a risk assessment of compliance and ethics risks completed on a consistent basis?
Program design	Risk Assessment	Owner	Is there a clear mapping within compliance of responsible parties for key risk areas?
Program Design	Confidential reporting structure and investigation process	Confidential reporting	Are employee-reported compliance issues tracked?
Program design	Policies and procedures	Accountability	Is there a policy for every key risk area?
Program design	Policies and procedures	Accessibility	Are policies, standards, and procedures (collectively, "policies") stored in a central location on the intranet?
Program Design	Third party management	Screening	Is effective due diligence conducted on third parties?
Program Design	Third party management	Screening	Is there a policy in place to ensure vendor and other third-party agreements are managed consistent with the terms of the agreement?
Program design	Training and communication	Awareness	Does compliance promote compliance awareness through newsletters, email blasts, or Yammer posts?

Program design	Training and communication	Communications	Are employees consistently surveyed on the effectiveness of compliance communications?
Resources and empowerment	Commitment by Senior and Middle Management	Board of Directors	Are all Committee and Board minutes reviewed to ensure active engagement in compliance issues?
Resources and empowerment	Commitment by Senior and Middle Management	Board of Directors	Is there a process detailing clear escalation channels for compliance issues to the appropriate oversight committee?
Resources and empowerment	Commitment by Senior and Middle Management	Chief Compliance Officer	Does the Chief Compliance Officer have the authority to start a working group to look at new or emerging compliance risks?
Resources and empowerment	Autonomy and Resources	1st line of defense	Is there a clear mapping of compliance champions throughout the company?
Work in practice	Continuous Improvement, Periodic Testing, and Review	Audit	Are all areas of compliance and ethics audited by internal audit?
Work in practice	Continuous Improvement, Periodic Testing, and Review	Culture	Does the company promote a culture of compliance and ethics?
Work in practice	Analysis and Remediation of Any Underlying Misconduct	Analysis	Have there been transactions or deals that were stopped, modified, or further scrutinized as a result of compliance concerns?
Work in practice	Continuous Improvement, Periodic Testing, and Review	Planning	Is the testing and monitoring plan based on the results of the risk assessment?

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