



ICC Antitrust Compliance Toolkit

An Introduction

ICC Roundtable on Competition Policy
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Anny Tubbs
General Counsel, Competition at Unilever
Co Vice-Chair of the ICC Task Force on
Compliance and Advocacy



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ICC'S ANTITRUST WORK



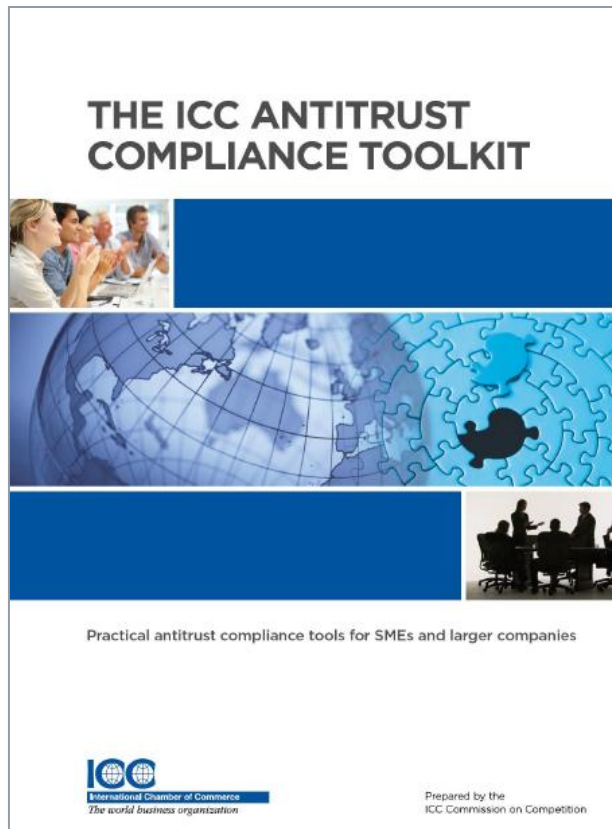
- ICC Commission on Competition
- Working group on Antitrust Compliance and Advocacy
- Ongoing dialogue with regulators
- Interest in promoting consistently high global standards for antitrust compliance to assist companies and, as a consequence, stimulate trade and investment
- Aim: develop practical Toolkit for companies
- Complement existing materials - build on components of compliance in ICC/CLO BluePrint
- Toolkit should assist companies of all sectors and sizes



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TOOLKIT CONTENTS

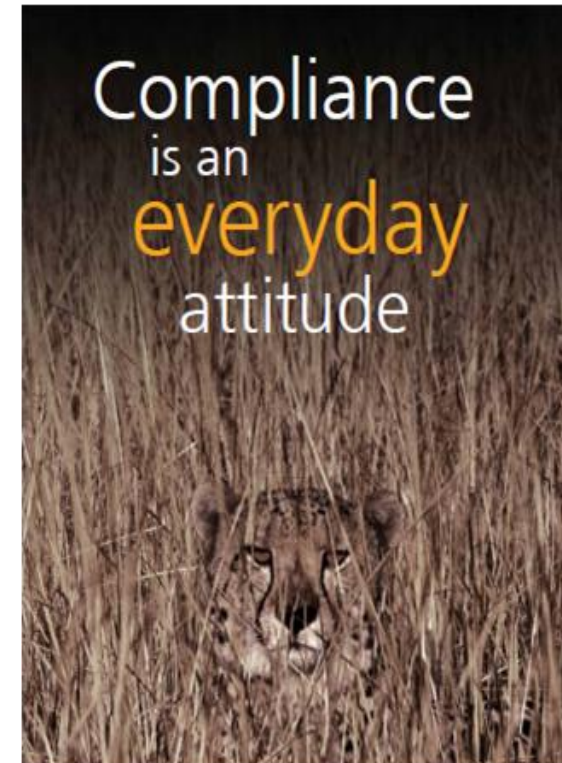


1. Compliance embedded as company culture and policy
2. Compliance organization and resources
3. Risk identification and assessment
4. Antitrust compliance know-how
5. Antitrust concerns-handling systems
6. Handling internal investigations
7. Disciplinary action
8. Antitrust due diligence
9. Antitrust compliance certification
10. Compliance incentives
11. Monitoring and continuous improvement

KEY CONSIDERATIONS



- What success looks like
- No “one size fits all” or overnight solutions
- No such thing as “zero risk”
- The people factor
- Alignment with broader programme
- What are effective controls?
- Reconciling regulatory requirements
- Championing compliance for vibrant businesses



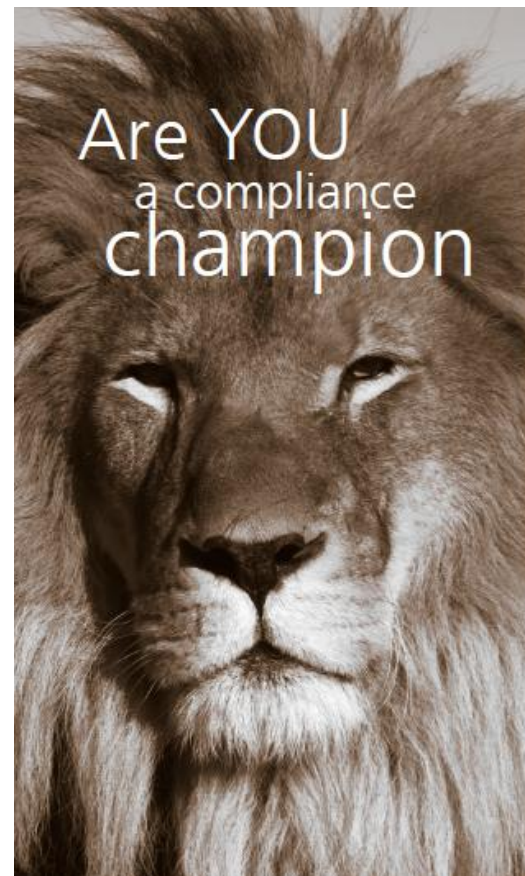
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WHAT NEXT?



- Dissemination of Toolkit to members
- Electronic version and further materials/links
- Opportunity to share with specialists in other fora
- Broader audience: leaders, Risk/Finance community
- Constructive dialogue with antitrust agencies
- Update Toolkit in due course?



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