

# Starter Kit

(for SMEs and others starting to introduce a compliance programme)

- Are you short of time and resources?
- Do you want to know how to apply this to your business?

## Foundation elements of the programme:

1. **Embedding an antitrust compliance culture and policy** (see Chapter 1)
  - Recognize that your company faces antitrust risks associated with its activities and objectives;
  - Consider how your company can set out antitrust standards all employees must meet when doing business;
  - Get business leaders to show personal support actively for ethical business practices.
2. **Compliance organization and resources** (see Chapter 2)
  - Nominate a suitably senior individual to oversee the implementation of the antitrust compliance programme;
  - Make sure they can and will report to highest levels of management;
  - Decide how to involve subject matter experts (including antitrust lawyers) to develop policies and/or guidance.
3. **Risk identification and assessment** (see Chapter 3)
  - Decide how to identify antitrust risks and trends, ideally as part of your general risk management process;
  - Consider what controls are needed to manage, minimize or eliminate the risks identified;
  - Share insights on the assurance process and scope for improvements with senior management.
4. **Antitrust compliance know-how** (see Chapter 4)
  - Tailor antitrust know-how guidance to the risk profile and needs of the company;
  - Decide on the best way to deploy interactive training and updates.

## Reinforcement of an existing programme:

5. **Antitrust concerns-handling systems and investigations** (see Chapters 5 and 6)
  - Embed a successful reporting culture that supports timely reactions and fair outcomes;
  - Consider the merits of appointing an external provider to act as a "hotline".
6. **Internal investigations/due diligence and disciplinary action** (see Chapters 6, 7 and 8)
  - Consider the most efficient way of investigating potential concerns (time may be of the essence);
  - Devise a simple but effective way of dealing with individuals who violate company policy.
7. **Antitrust certification or incentives** (see Chapters 9 and 10)
  - Think about asking employees to certify their understanding and commitment to compliance requirements;
  - Consider compliance incentives (in reward structures or promotion processes) to reinforce engagement.
8. **Monitoring and continuous improvement** (see Chapter 11)
  - Decide how you will monitor the effectiveness of your controls (e.g. periodically run targeted in-depth reviews);
  - Introduce a compliance improvement plan if necessary (e.g. if concerns arise or the company risk profile changes).