

Mini Summit IX: Implementation of Compliance Programs Across Different Countries - Cultural Implications

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Context

- **Companies operating worldwide**
 - implement Global and/or Regional Programs to
 - Address the compliance risks
 - Achieve consistency and harmonization
 - do not always consider the cultural differences

- **Culture: either company's culture or national culture**

- **National culture: result of many years continuous history and civilisation of a nation**

Examples of Cultural Traits & Implications

- **Relationship in doing business in Asian and not only countries**
 - “ Save the face”
 - Ready to do everything to build or maintain a relationship
 - Company’s assets of less importance
- **Culture of hospitality mainly in Asia and countries of which the economy is based on tourism**
 - Part of their identity, synonym of kindness
 - Hospitality or gimmicks provided in abundance
 - Cultural gifts or gifts in special occasions

Examples of Cultural Traits & Implications

- **Respect to hierarchy in various countries**
 - Establishing accountability (multiple levels of review up to the highest level)
 - Communication: significance of tone from the “ top” but barrier for all voices to be heard
- **Letter of the “ Rule ” vs. Spirit of the “ Rule ”**
 - Central European countries: in the absence of clear requirements, they seek clear guidance
 - Other European countries: spirit of the law prevails
 - Other Asian countries: gaps in controls are taken advantage of or substance of the rule is not respected while process is followed

Transforming the cultural differences into cultural understanding

- **Key to identify the pitfalls**
- **Put in place robust controls**
- **Manage the change**
- **Build communication plans**
- **Not to use culture as a pretext for non ethical practices**

What seems reasonable to us may not be for others