



SPARK COMPLIANCE CONSULTING

**Services and Areas
of Compliance Expertise**

About Spark Compliance

Spark Compliance Consulting focuses on the empowerment of the compliance function within business operations and the importance of establishing and maintaining an ethical culture.

We are pre-eminent leaders in anti-bribery, data privacy, ISO 37001 anti-bribery certification services, and providers of world-class compliance program evaluations, risk assessments, GDPR and CCPA data protection compliance and compliance program development services.



SPARK COMPLIANCE
CONSULTING
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Featured In



THE WALL STREET JOURNAL
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WEEK

Compliance & Ethics
Professional 

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Compliance and Ethics Program Evaluations

Spark Compliance provides a variety of world-class compliance, data privacy, and anti-bribery program evaluations.

Compliance Programs Featuring Spark's Proprietary CCEPA Methodology:

Spark Compliance Consulting's Comprehensive Compliance Program Assessment gives a clear picture of where your anti-bribery program is excelling, and where it has opportunity for improvement. Practical, pro-business recommendations are provided so that you can optimize and right-size your program to meet best practices and regulator expectations, while still working with the business in a pragmatic way.

Your program is global, so you need to know how you're evaluated on a global scale. Our proprietary Comprehensive Compliance and Ethics Program Assessment (CCEPA) methodology tests the program using multiple inputs in order to obtain a view from inside the compliance department and out. Your program will be evaluated and measured against criteria informed by and consistent with:

United States Federal Sentencing Guidelines, Section 8

The Ministry of Justice Guidance to the UK Bribery Act

The U.S. Department of Justice's Resource Guide to the Foreign Corrupt Practices Act

Brazilian Clean Companies Act

France's Sapin II Law

ISO 37001 Anti-Bribery Management Systems Standard

Transparency International's Managing Third-Party Risk

World Economic Forum's Good Practice Guidelines on Conducting Third-Party Due Diligence

ISO 19600 Compliance Management Systems Guidelines

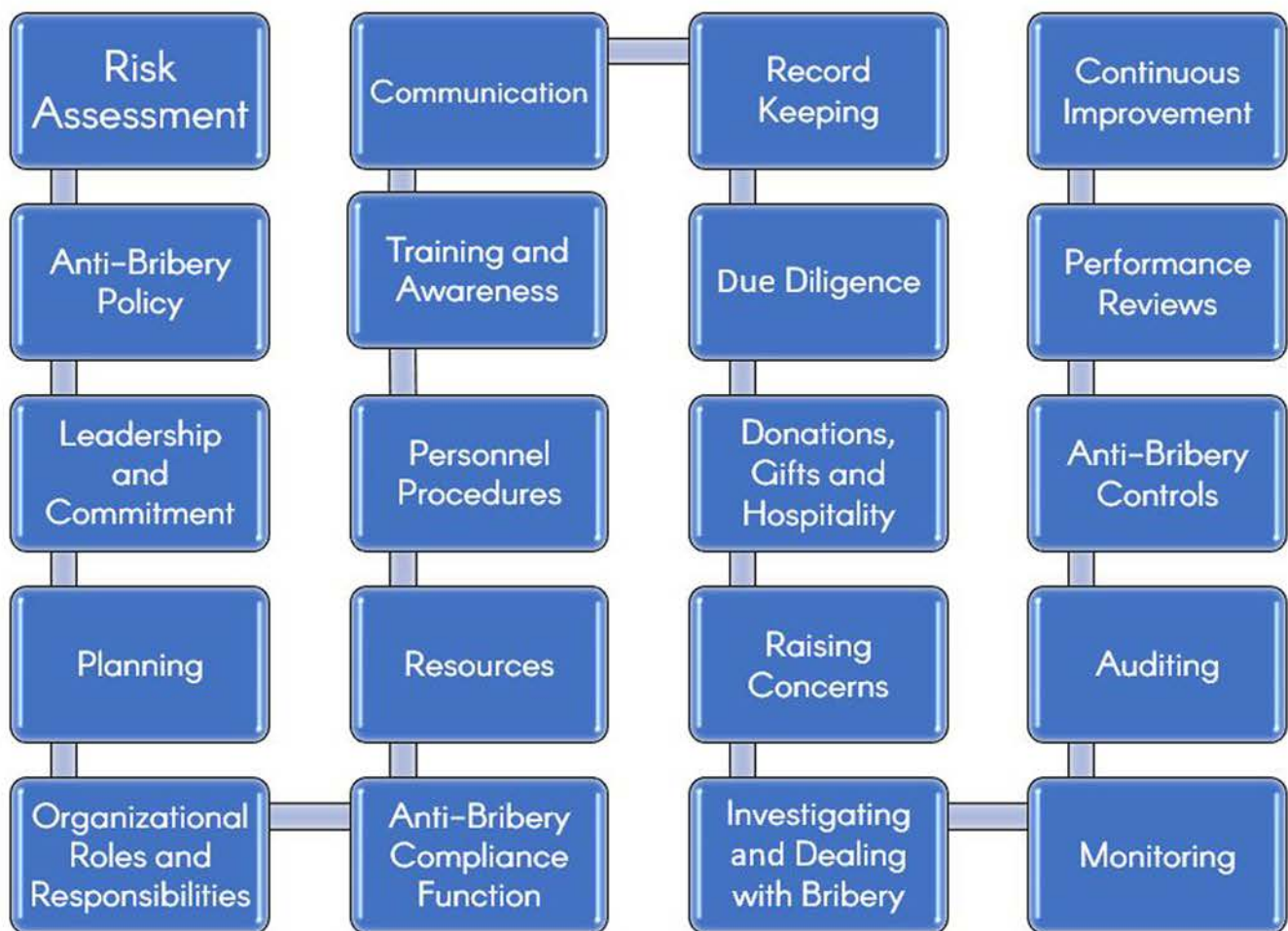
Benchmarking Reports from industry groups such as NAVEX, Steel and the SCCE

Anti-Bribery and Third-Party Risk Program Evaluations

Spark Compliance provides three bespoke anti-bribery and third-party risk program evaluations.

Anti-Bribery program Evaluation

Your anti-bribery program will be evaluated in 20 key areas, each complete with practical, pragmatic recommendations for improvement now, and for continuous improvement in the future. These include:

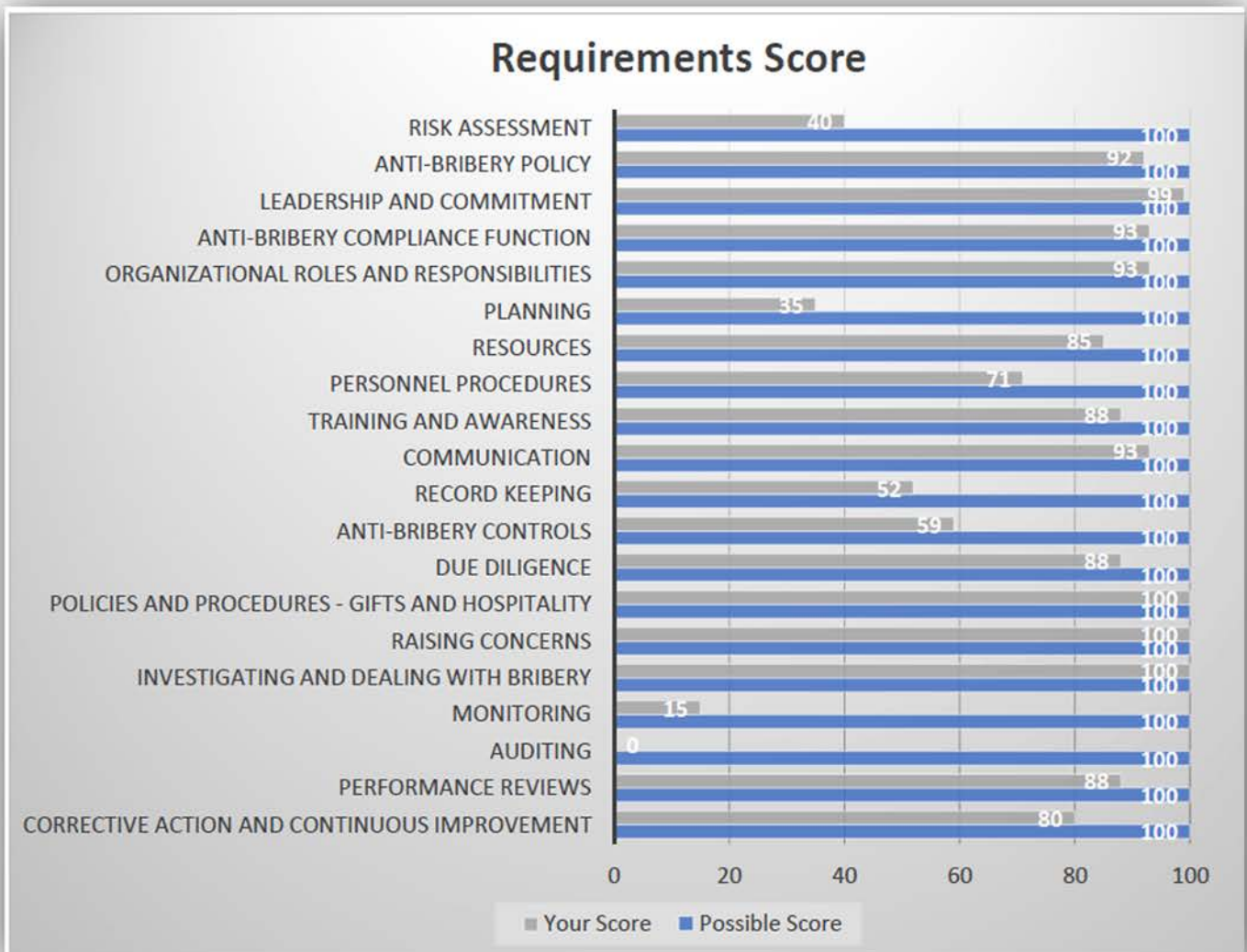


ISO 37001 Anti-Bribery Management Systems and Certification Readiness

The ISO 37001 Anti-Bribery Management Systems standard is the very first globally-recognized anti-bribery program certification. Spark Compliance is a global leader in ISO 37001 readiness and certification preparation.



Our one day on-site readiness assessment provides critical information about your program and shows you how close you are to being ready for ISO 37001 certification.



Risk Assessment

A risk assessment is the bedrock of any compliance and ethics program. It ensures that the compliance program meets regulatory expectations and guidance from prosecutorial agencies. It identifies blind spots and places where risk isn't being managed consistently.

Most importantly, a risk assessment allows a company to prioritize its response to risk, and implement controls to mitigate those risks effectively.

CCREE Methodology

Spark Compliance Consulting uses its proprietary Comprehensive Compliance Risk Environment Evaluation (CCREE) methodology. This review separates regulatory and non-regulatory risk to give a comprehensive assessment of all major compliance risks facing the company.

Regulatory Risk

- Bribery and Corruption
- Data Privacy and Protection
- Competition / Anti-trust
- Trade Sanctions / Import / Export
- Modern Slavery and Supply Chain

Non-Regulatory Risk

- Conflicts of Interest
- Policy Implementation and Comprehension
- Records Management and Retention
- Whistle-blowing Systems and Investigation Protocol

Other Risks

- Other Risks as Identified during the Review

Data Privacy Including GDPR and CCPA

Data privacy is at the forefront of many compliance officers' minds. New regulations seem to be coming into force daily. You need real expertise to respond to these laws effectively. More importantly, you need a streamlined program meeting best practices to ensure your program meets the laws in force today, and those that will come into force tomorrow and beyond. We will help you by:

Data Protection Officer:

Ensuring that the Data Protection Officer role is properly set up and documented

Data Audit:

Planning for and completing your data audit

Data Map:

Planning for and completing your data map

Privacy Notices:

Drafting your privacy notices, or ensuring that your privacy notices are compliance with GDPR

Privacy Policy:

Drafting your privacy policies, or ensuring that your privacy policies are compliance with GDPR

Privacy Training and Communications:

Creating an effective and entertaining training and communications plan for staff

Privacy Impact Assessment Process:

Creating a Privacy Impact Assessment process and template document

Risk Register Development: Ensuring that a Risk Register has been created and that a review, update and audit process has been developed for it

Data Breach Preparation:

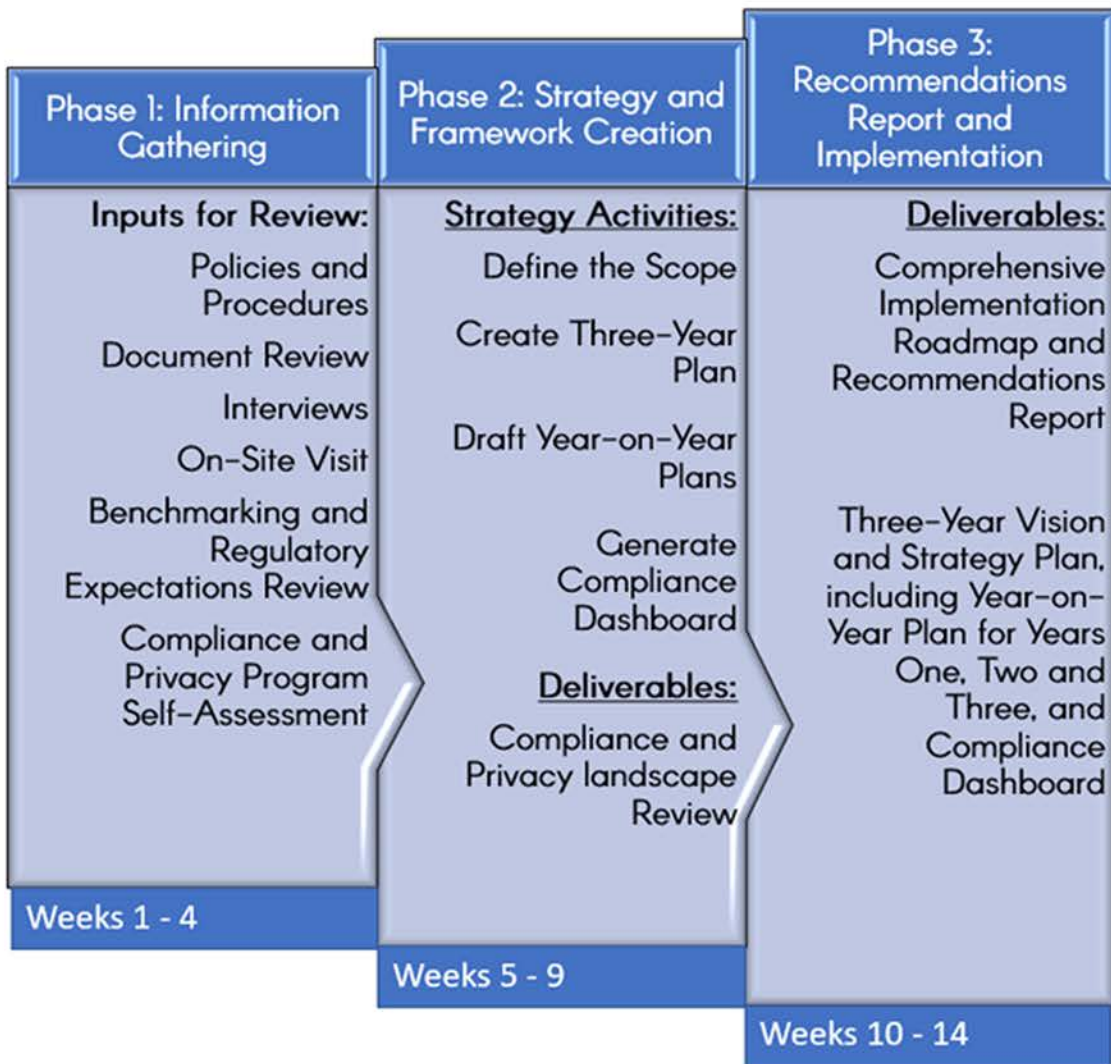
Drafting or reviewing data breach response protocol and planning documents to ensure they are compliant with GDPR's strict notification requirements

Third-Party Contract Checklists:

Ensuring that a mechanism exists to verify that third-party supplier / processor contracts include the contractual terms and obligations required by GDPR

Compliance Program Creation and Optimization

If you're starting from scratch, it can be difficult to know how to create a compliance and ethics program. Spark Compliance's pragmatic approach ensures you will have a proportionate, pro-business compliance and ethics program. We take a three-phased approach.



Modern Slavery Prevention and Supply Chain

It is a sad truth that an organization's supply chain may unknowingly include entities and individuals who traffic in slavery, forced labor and child labor. In an effort to stamp out these human rights abuses, more laws are coming into effect that require organizations to disclose the efforts they are making to ensure that no slavery, forced labor or child labor is included within their supply chain.

Laws like the United Kingdom Modern Day Slavery Act, California Transparency in Supply Chains Act and US federal legislation around government contracting require transparency and disclosure around supply chain management.

Spark will help you to demonstrate your organization's commitment against modern slavery and your dedication to protecting human rights by implementing effective policies and procedures throughout your supply chain.

SERVICES:

Modern Slavery Risk Assessments

Modern Slavery Prevention Recommendations and Prevention Plan Implementation

Assistance with Modern Slavery Response drafting and publishing

Prevention of Modern Slavery and Red Flag Recognition Training



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