

WORKING WITH STATE- OWNED ENTERPRISES

Dr. Kyrill Farbmann

EMEA Ethics and Compliance Manager

International Paper

INTERNATIONAL PAPER - EMEA

- 9,300 employees (+ 19,000 JV in Russia)
- 3 pulp and paper mills, 3 recycled containerboard mills and 26 box plants, manufacturing in 8 countries,
- Sales in over 40 countries
- Over 20 legal systems and 20 languages
- Outside EU, we are active in Turkey, Morocco, Russia, Ukraine, Kazakhstan etc



COMPLIANCE AT INTERNATIONAL PAPER EMEA

Part of the legal department

13 people worldwide

In EMEA - working with 21 countries,
champion system

Responsibilities:

- Rollout of IP Code of Ethics, Suppliers' Code of Ethics and Policies
- Internal investigations
- Trade compliance / sanctions
- IP Helpline
- Data protection
- Antitrust



WAYS OF WORKING WITH STATE-OWNED ENTERPRISES

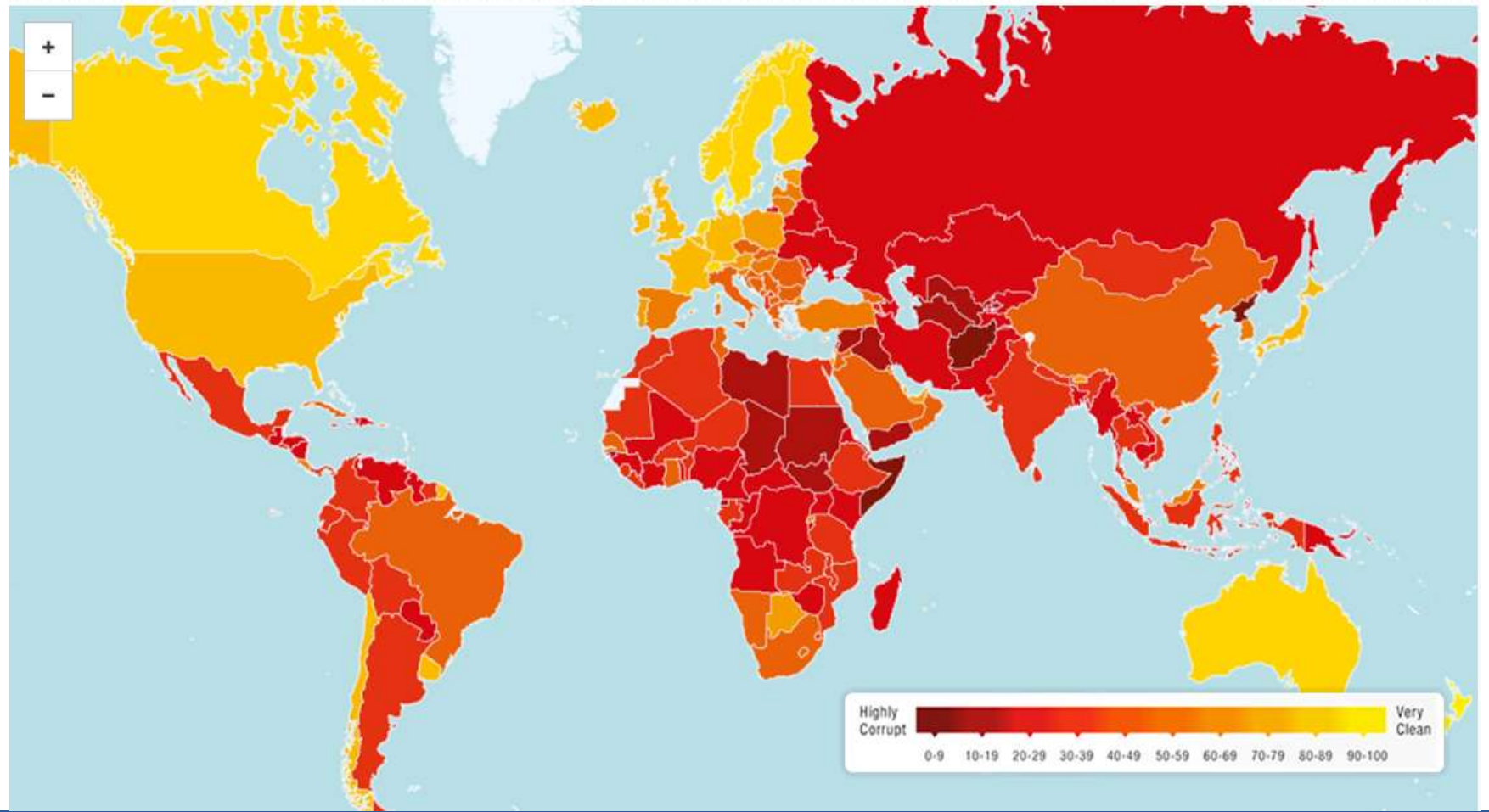
- **Joint ventures**
- **Customers**
- **Suppliers**
- **Through third parties**

RISK ASSESSMENT

CORRUPTION PERCEPTIONS INDEX 2013

[VIEW BROCHURE](#)

[VIEW RESULTS TABLE](#)



  #CWE2014

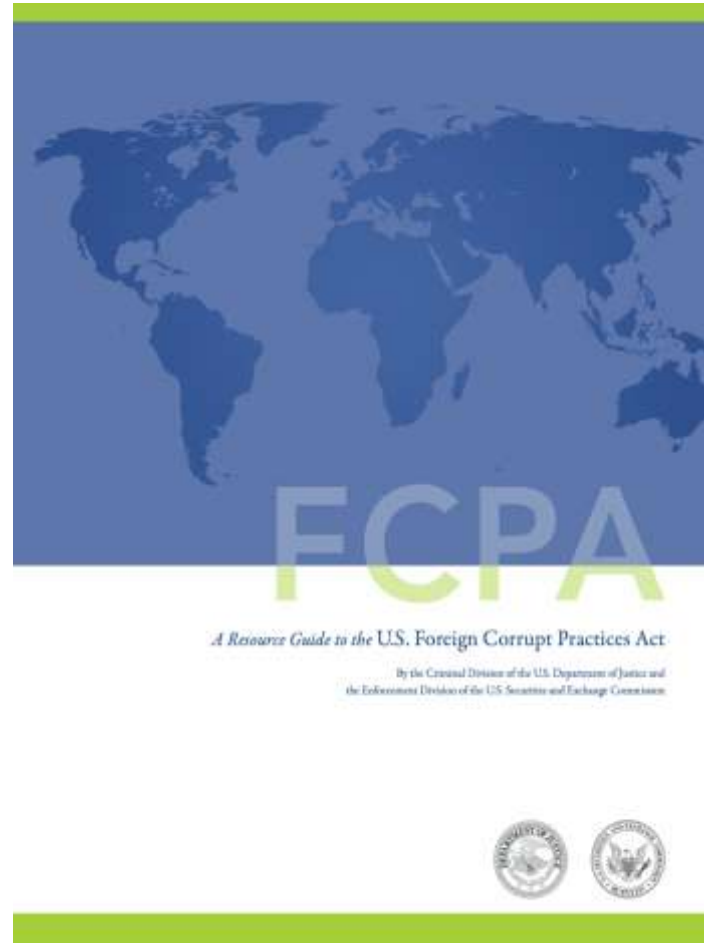
COMPLIANCE WEEK EUROPE
POWERFUL INSIGHTS, PRACTICAL IDEAS, REAL SOLUTIONS

JV'S

- **Due diligence on JV partner prior to investment**
- **Structuring JV agreement to promote compliance**
- **Compliance oversight responsibilities should be spelled out in the JV Board's charter**
- **Transparency into the actions of the JV for its parents**
- **Controls for high-risk transactions**
- **Working regularly with JV board members and senior employees.**
- **Provide compliance program**
- **Periodic risk assessment**
- **Regular trainings**

CUSTOMERS AND SUPPLIERS

- **Determine whether suppliers / customer is state-owned**
- **Raising awareness for state-owned enterprises**
- **Risk assessment**
- **Ongoing control (gifts, support, promotion of products and services)**
- **Internal investigations involving State-owned enterprises**



THIRD PARTIES

Understand qualifications of third-parties

- **business reputation**
- **relationship with foreign officials**

Understand business rationale for including the third party in the transaction

- **role of and need for the third party**
- **ensure that contract describes the services to be performed**

Monitor third-party relationships

Inform third parties of compliance program and commitment to ethical and lawful business practices