

Compliance Report

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Preliminary Considerations

Adherence to compliance guidelines and internal requirements is a management task and responsibility. The Compliance Officer's task is to support the management, conduct risk analyses, draft a report once a year, and conduct in-person meetings with management twice a year. This report is the first of its kind and will serve as the basis for the compliance processes either to be installed or continued, under particular consideration of compliance relevant issues.

Scope

The Compliance work and tasks are defined in accordance with the purpose, organizational and management structure of the ECoD NPO. A particular focus shall be on the fact that right from the beginning and inception of the NPO, external, technical advice and legal support was consulted for drafting guidelines, regulations and other documents.

The report provides key information to all employees, management and stakeholders.

Compliance Core Activities

The Compliance Report covers all ECoD NPOs affairs by focusing on the following areas:

- Compliance with legal requirements
- Non-Profit Regulations and Anti-Corruption rules

- Financing and ownership structure
- Stakeholder and Governance Strategy
- Mission Statement
- Code of Conduct
- Internal and organisational Guidelines

Note: Data- and Cyber-Security and Data Protection were not covered in the review and thus are not included in the report, as they are covered by the Innovation in Politics Institute's data protection officer (in a joint controllership).

Compliance Risk Management

A compliance risk management analysis was carried out and implemented. During this process risks were identified and evaluated, and impact and probability of occurrence measured. With this process for every task, compliance-relevant matter for the responsible person or group of persons was identified, as well as the target group affected.

This risk management will be the starting point of designing necessary compliance strategies, reporting structure, training needs and communication requirements.

Employment Law

In this section we also include the adherence to health and safety regulations, employment law and tax/duties law in regard to employees' matters.

It can be stated that a very good interplay between legal/tax law support and internal handling is in place. Regarding health and safety regulations, all rules have been followed. The placement of a first-aider is underway. The Working Time Act is adhered to, internal processing could be more stringent.

Also covered in this section are the very important topics of equality, diversity and inclusion. In these areas issues have been raised as worthy of consideration and revision. A process to cover these queries has been started with an external consultant and is ongoing.

The Works Council now also represents ECoD NPO's employees.

Financial and Accounting Requirements

The collaboration with external tax and legal support works effectively and to the satisfaction of those involved.

For matters of Public Funding, and its handling and implementation for the NPO, expertise needs to be brought in on an ad hoc basis.

Transparency

Timely and comprehensive information shall be provided. ECoD NPO currently restructures this process, data collection and data processing in a more coherent manner, supported by a dedicated employee and IT structure.

Screening

Screening is required of stakeholders, employees, other agents, and business partners. Third Party due diligence is a very sensitive topic for the ECoD NPO. Guidelines and screening are in place. As ECoD NPO has to deal with a multifaceted target group, an update of relevant documents has to be conducted, and information has to be brought to the attention of those involved and of dedicated persons doing the screenings. Supporting documents / guidelines need to be offered for assistance.

Governance

Management and leadership guidelines are in place. A Code of Conduct has been drafted. A special focus in organisational and financial conduct lies on the ownership structure. All guidelines, documents, regulations drafted for internal or external use follow an update cycle established by the NPO.

Privacy, Intellectual Property and Copyright Law

For these legal topics, the NPO needs to draft regulations, further raise the awareness of employees and offer training.

Anti-Corruption and Bribery Policy

This sets out the NPO's approach and measures to prevent bribery and other forms of corruption. For all relevant stakeholders guidelines are in place, shared, updated, and brought to notice. As the NPO is operating within a very sensitive structure, regular screenings to raise the awareness of stakeholders and employees on a more frequent basis are recommended.

Environmental Protection

A catalogue of measures is being developed further, driven by the Innovation in Politics Institute for all Programmes. Internal and office conduct is observed and pursued.

Summary and Recommendations

Standards, policies and procedures are in place for all areas, those need to be updated on a regular basis.

The Compliance Programme administration has been set up and will be incorporated in ECoD NPO routines.

Monitoring, auditing, and internal reporting are carried out. Those need to adhere to a schedule and follow the needs and requirements of the target group and communication interests.

Communication, education and training need to be set up according to the identified areas, where appropriate measures are needed, and scheduled in a timely manner.

Investigations, remedial measures and complaints handling shall be supported by a screening structure. Remedial actions shall be communicated through an update in the relevant documents.

Complaints and whistleblowing incidents handling are a task still open. A process needs to be discussed and defined in the upcoming half-year meeting.

Screening and evaluation of stakeholders and stakeholders' needs, employees and other agents should be conducted on a more structured and regular basis.