





6th Annual Conference on

# Anti-Corruption NORDICS

The premier conference in the region for networking and global compliance benchmarking

## 29 - 30 January 2020 | ♥ The Clarion Hotel Oslo, Norway

#### **Government Faculty:**



Hanne Margrethe Meldal Senior Legal Advisor Ministry of Labour and Social Affairs (Norway)

#### Meet and learn from a regional and international faculty, including:

- > Aibel AS
- > Coloplast A/S
- > Equinor ASA
- > Falck
- > Fjord Line AS
- > FLSmidth A/S
- > Höegh LNG AS
- > Nordic Investment Bank
- > Pontarius AB
- > VEON
- > Vestas Wind Systems A/S
- > Yara International

#### Special Insights from:

- > FCPA Defence Counsel from Major Cases Affecting Industry in the Nordics
- Leading CCOs and General Counsel

#### Join Industry Executives at the Pre-Conference Workshops



Case Review on the Extra-Territorial Reach of the FCPA and UKBA

Third Party and M&A Due Diligence Processes: How Much Due Diligence is Now Enough

Experts from the Nordic countries, Germany, Russia, China, the UK and U.S. will discuss critical issues affecting your business, including:

- > ANTI-CORRUPTION & SUSTAINABILITY: How to Meet New Compliance Expectations of Government, Investors and Civil Society
- > DEFENDING YOUR COMPLIANCE PROGRAMME TO THE AGENCIES: Practical takeaways on how to prepare for the meeting and what to expect
- > INTERNAL CONTROL SYSTEMS: The Newest, Unspoken AML Risks, and Enforcement Trends

#### **NEW NETWORKING & BENCHMARKING OPPORTUNITIES:**



#### COUNTRY SNAPSHOTS ON RISK & COMPLIANCE

Unique challenges in CHINA and RUSSIA



#### "COMPLIANCE ROUNDTABLES & EXCHANGES"

Smaller-Group Discussions on Human Rights, GDPR. Crisis Management and Training



#### **ENHANCED COMPLIANCE PROGRAMME BENCHMARKING**

The right tools for measuring, tracking, producing data and reporting to demonstrate compliance



#### LIVE AUDIENCE POLLING

Compare the latest approaches to resolving high stakes issues

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# **Expand Your Global Network. Learn the Unwritten Rules for Effective Compliance.**







#### NEW

#### "COMPLIANCE ROUNDTABLES & EXCHANGES"



Led by expert facilitators involved in some of the most significant cases to date, benefit from the opportunity to discuss sensitive, hot button issues.

The sessions will include:

- Human Rights and Corruption Risks: How ethics-based compliance systems foster a solid culture and add value
- How to Detect Actual or Suspected Violations of Key GDPR Principles: Recent enforcements actions and practical takeaways
- Crisis Management: Concrete examples of how to navigate the legal, PR and reputational aftermath
- Compliance Training for Sales Departments: The latest on what an impactful training programme looks like

#### ENHANCED BENCHMARKING



- Evaluating and Defending Corporate Compliance Programme to the Agencies
- · Resolving Gifts & Hospitality Dilemmas on the Ground
- Identifying and Addressing Potential Conflicts of Interest
- Operationalising Your Compliance Programme: Dovetailing Your Program, Data Governance and Reporting with the Overall Business Strategy

#### **MUST-ATTEND DEFENCE COUNSEL "WAR STORIES"**



Participants will benefit from a unique opportunity to hear critical updates on the rapid evolution of bribery schemes that are affecting industries of all kinds. Gain insights from experts who will share Strategies for Structuring, Conducting and Managing the Costs of Multi-Jurisdictional Investigations.

#### NEW COUNTRY SNAPSHOTS ON RISK & COMPLIANCE

Join an opportunity to dive into unique challenges in the following high risk markets:



CHINA - New anti-bribery compliance expectations, Cyber Security law, State Secrecy and privilege issues

RUSSIA - Demystifying the latest sanctions and compliance best practises

#### ANONYMOUS AUDIENCE POLLING ON CRITICAL CHALLENGES:



Select panel sessions will incorporate anonymous polling to collect audience feedback and identify compliance best practices. The audience will be able to respond to panel questions confidentially, enabling you to get honest feedback on hot button issues.

#### **GOVERNMENT FACULTY:**



Hanne Margrethe Meldal Senior Legal Advisor
Ministry of Labour and Social Affairs, Norway

#### **CO-CHAIRS:**



Anne Helen Lunde Chief Compliance Officer / VP Legal **Equinor ASA (Norway)** 



Bo Berndtsson Specialist Counsel | Advokat Setterwalls (Sweden) Former Chief Compliance & Ethics Officer at Volvo AB

#### SPEAKERS:



**Brittany Prelogar** Partner Steptoe & Johnson LLP (USA)



Fabrizio Camerini Director Business Partner Integrity Yara International ASA



Elisabeth Andvig Adviser, Human Rights and Humanitarian Affairs **Permanent Mission of Norway** to the U.N. (Norway)



Eva Jarbekk Partner Schjødt (Norway)



Camilla Nyhus-Møller Chief Legal & Compliance Officer Höegh LNG AS (Norway)



Jeppe Kromann Haarsted Group Compliance Manager FLSmidth A/S (Denmark)



Maria Rabben Ethics and Compliance Advisor Aibel AS



Hanne Sønderland Manager, Compliance & Internal Controls, Digital Protection Officer Anti-Money Laundering Officer Fjord Line AS (Norway)



Vladimir Efremov Partner **Baker & McKenzie** - CIS, Limited



Tron Dalheim Partner Thommessen (Norway)



Laila Sivonen Senior Associate Roschier, Attorneys Ltd. (Finland)



Pia Vining Senior Director of Due Diligence TRACE International, Inc. (USA)



Mark Butler Chief Compliance Officer **Nordic Investment Bank (Finland)** 



Martin Lønstrup Head of Global Compliance, Senior Director Falck (Denmark)



Giovanni Paolo Falcetta TozziniFreire Advogados



Jeffrey W. Cottle Partner Norton Rose Fulbright (UK)



Jens Ole Legart Investigation, Business Ethics and Compliance Manager and Specialist Vestas Wind Systems A/S



Joachim Orton Pikwer General Counsel **Pontarius AB** 



Paul Feldberg Partner Jenner & Block (UK)



Dominique Abrokwa Partner **Pohlmann & Company** 

Peter B. Pope



Partner **Jenner & Block (UK)** Recently returned from a secondment to the UK Serious Fraud Office, where he served as International Liaison and Investigations Advisor



Nicola Bonucci Managing Director, Investigations & Compliance Paul Hastings (Europe) LLP Formerly Director for Legal Affairs for the ÓECD



Anne Gaustad Partner **Hughes Hubbard & Reed LLP** 



Gareth Rees, QC King & Spalding International LLP (UK)



David M. Stuart Cravath, Swaine & Moore LLP (USA)



Zoe Osborne Steptoe & Johnson LLP (UK)



Esther M. Flesch Partner - Founder Flesch Advogados (Brazil)





#### SINCE ITS INCEPTION 5 YEARS AGO.

#### THIS EVENT HAS GATHERED KEY STAKEHOLDERS FROM ACROSS THE GLOBE:

### **70%** of attendees are from the Nordics

- » Denmark
- » Norway
- » Finland
- » Sweden
- » Iceland

- 30% are from:

» Austria

» Belgium

» Brazil

» Chile

» Cyprus

- » Diibouti
- » France
- » Germany
- » Great Britain
- » Lithuania
- » Netherlands
- » Poland
- » Russia » Saudi Arabia
- » Spain
- » South Africa
- » Switzerland
- » United Arab **Emirates**
- » United States

#### A MUST-ATTEND EVENT FOR:

**General Counsel** 

**Chief Compliance Officers** 

**Corporate Counsel** 

- » Sustainability
- » International Trade Counsel
- » Trade and Regulatory Counsel
- » Corporate Social Responsibility

**Ethics Officers** 

**Directors, Internal Audit** 

**Directors, Import Export Compliance** 

**Directors, Business Conduct** 

**International Contract Managers** 

**Directors, Corporate Audits** and Investigations

#### **Forensic Accountants**

#### **Outside Counsel** specialising in:

- » Corporate Compliance
- » White Collar Crime
- » Internal Investigations
- » Corporate Governance



08:30 - 12:00 (Registration & Coffee Start at 08:00)



#### **ANTI-CORRUPTION CASE REVIEW**

The Extra-Territorial Reach of the FCPA, the UKBA and Recent Expectations for **Corporate Compliance Programmes** 



**Brittany Prelogar** Partner Steptoe & Johnson LLP (USA)



Zoe Osborne Partner Steptoe & Johnson LLP (UK)

At this practical session, expert faculty members will review key principles of the Foreign Corrupt Practices Act "FCPA" and the UK Bribery Act "UKBA" including its extra-territorial application to date. The speakers will then delve into the complexities of key and recent regulatory and enforcement matters toward imparting real-life lessons for industry moving forward. Gain helpful insights on the ins and outs of significant cases, and how to leverage the lessons learned to better enhance your compliance status moving forward.

- Who is covered by the FCPA and the UKBA?
  - » Organisations Who qualifies?
  - Individuals What categories of persons who are covered by the Act?
- What is the extraterritorial reach of the FCPA and the UKBA today?
- When the extraterritorial application of the FCPA is challenged How significant is the Hoskins case?
- What are the new risks affecting organisations and their employees?
- Basic elements of the FCPA's anti-bribery provisions
- Key aspects of the FCPA accounting provisions: Books and records, record keeping and internal controls requirements and standards
- Permissible and impermissible payments
- Involvement of third parties and due diligence requirements: Agents, consultants and joint venture partners
- Factors that trigger government investigations under the FCPA and the UKBA
- A deep dive into key investigations and settlements, and what they reveal about DOJ and SEC expectations today
- Circumstances have led to declinations, DPAs and NPAs
- What does "cooperation" mean for the authorities as well as the company under investigation? What are the limits and precautions to take?
- How to cooperate with authorities in the context of multi-jurisdictional investigations
- Which areas of your compliance programme need to be improved considering an investigation and how can this be achieved?
- The significance of DOJ Update on the evaluation of Corporate Compliance Programmes
- Prosecution of individuals, including Legal and Compliance Officers: What is the scope and the limits of personal liability?

13:30 - 17:00 (Registration & Coffee Start at 13:00)



#### THIRD PARTY AND M&A DUE DILIGENCE PROCESSES

How Much Due Diligence is Now Enough to Assess and Mitigate Risks in Transactions, Private Equity Dealings and Hiring



Pia Vining Senior Director of Due Diligence TRACE International, Inc. (USA)



Fabrizio Camerini Director Business Partner Integrity Yara International ASA

This intensive, practical working group will discuss transactional due diligence and a myriad of both business and compliance activities such as third-party vetting and on-boarding, M&As pre-transactions challenges, private equity dealings/investment due diligence, screening and pre-hiring background checks. In the wake of continued high-profile enforcement actions across the globe, the working group will focus on how to resolve new and evolving due diligence challenges. Ensure that you are up-tospeed on the latest due diligence best practices and pitfalls that can heighten exposure.

- Determining your risk tolerance and how far to go in conducting pretransaction due diligence
- Developing a risk model that stratifies your risk based on third parties - and how to perform due diligence accordingly
- Key GDPR considerations and constraints to your due diligence process - How to proceed without breaches
- Detecting issues with the target's sales practices, business model and third parties
- When and how much due diligence to perform for an ongoing, existing third-party relationship
- Understanding the local business environment, customs and practices
- How to incorporate effective front-end vetting and screening protocols on a third party, a target and a potential employee
- Red flags to consider in a target's accounting practices
- Measuring the consequences of potential undiscovered violations before the deal, knowing the negative impact of "buying an enforcement action"
- How to ensure enough access and meaningful information before the transactions - What to do if such access is impossible in a high-risk jurisdiction
- What kind of due diligence can be done to get the "true value" of a target
- What to do when the due diligence reveals problems pre-transaction:
  - » How to evaluate background red flags
  - » When red flags can derail or delay a transaction
- When to Consider Terminating a Third Party Relationship Over Bribery Suspicions: Anti-Corruption, Contractual and Other Key Considerations

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#### **MAIN CONFERENCE DAY 1**

**Wednesday, 29th January 2020** 

Registration & Welcome Coffee

08:30

#### **Opening Remarks from the Co-Chairs**



Anne Helen Lunde Chief Compliance Officer / VP Legal **Equinor ASA (Norway)** 



Bo Berndtsson Specialist Counsel | Advokat Setterwalls (Sweden)

Former Chief Compliance & Ethics Officer at Volvo AB

#### THE OECD'S FIGHT AGAINST CORRUPTION

#### **Expectations for 2020 and Beyond**



Nicola Bonucci Managing Director, Investigations & Compliance Paul Hastings (Europe) LLP



#### **ANTI-CORRUPTION COMPLIANCE** AND SUSTAINABILITY

**How Companies are Meeting New** Compliance Expectations of Regulators, **Enforcers, Investors and the Civil Society** 



Joachim Orton Pikwer General Counsel **Pontarius AB** 

- Sustainability and compliance strategic cornerstones in the Nordics
- What are the drivers of sustainability "requirements"?
- How the ongoing AML monitoring failure in the banking sector is affecting compliance budgets
- The tools available to maintain an acceptable standard of compliance - What companies are using for reporting?

10:00 Morning Networking Break

10.30

#### **CORPORATE COMPLIANCE** PROGRAMMES #1

**Evaluating and Defending Corporate Compliance Programme to the Agencies Post-DoJ Guidance** 



Paul Feldberg Partner Jenner & Block (UK)

David M. Stuart



Martin Lønstrup Head of Global Compliance, Senior Director Falck (Denmark)



Partner Cravath, Swaine & Moore LLP (USA)

This new session will navigate how to prepare for meetings with enforcement agencies and to walk them through your programme. Expert speakers discuss what the agencies are looking for with respect to key programme elements and improvements.

Benefit from an opportunity to hear from seasoned practitioners with extensive first-hand experience and ask them your questions. Amid new, evolving compliance and enforcement priorities such as, the DOJ Guidance on the evaluation of corporate compliance programmes, take away important lessons learned and helpful insights for your compliance efforts.

#### **INTERNAL INVESTIGATIONS**

Strategies for Structuring, Conducting and Managing the Costs of Local and Multi-**Jurisdictional Investigations** 



Jens Ole Legart Investigation, Business Ethics and Compliance Manager and Specialist

Vestas Wind Systems A/S



Jeffrey W. Cottle Partner Norton Rose Fulbright (UK)



Giovanni Paolo Falcetta Partner TozziniFreire Advogados

- How to assemble the team, determine the scope and engage different departments while ensuring that there is independence in the process
- What should be the role of the compliance officer in an internal investigation?
- Cultural considerations and practical interview techniques to ensure you get the information you are seeking in the jurisdiction where the facts took place
- How to deal with inconclusive findings and avoid any perceptions of "an unsatisfactory" investigation
- How to communicate with the Nordics authorities regarding a potential violation -What protections are provided to the company?
- Determining how much you need to spend and how to control the risk of rising costs
- · When to stop: How to know when to conclude the investigation
- Why some internal investigations do not detect the wrongdoing?

12:30 **Networking Luncheon** 

13:45



#### **COUNTRY SNAPSHOT # 1 CHINA**

What Industry Needs to Know about the Local Bribery Corruption Crackdown: New, Evolving Standards and Trends

New for this year, industry experts will discuss the practical realities of operating in China today and beyond, and the latest anti-corruption initiatives and the enforcement landscape. In addition to key updates, speakers will discuss the countryspecific challenges affecting risk mitigation.

Afternoon Networking Break 14:30



Select a roundtable and join the discussion, exchange views, debate questions and share experiences around current industry challenges.

#### #1 HUMAN RIGHTS & CORRUPTION RISKS:

#### **How Ethics-Based Compliance Systems** Drive a Solid Culture and Add Value



Elisabeth Andvig Adviser, Human Rights and Humanitarian Affairs **Permanent Mission of Norway** to the U.N. (Norway)

- How do human rights and corruption risks connect and what is in it for organisations?
- What are the drivers to push companies to assess compliance with human rights?
- How companies should put transparency and accountability at the forefront of their operating principles
- How existing compliance programme and systems should be upgraded to incorporate ethics and human rights

#### #2 GDPR:

When is Your Organisation at Risk: Processing, Accessing, Transferring, **Retaining and Preserving Personal Data** 



Eva Jarbekk Partner Schjødt (Norway)

The group will reflect on recent GDPR enforcement actions across different EU Member states with a focus on practical takeaways. Four major cases include:

- Google vs. The French Data Regulator (CNIL)
- Centro Hospitalar Barreiro Montijo vs. The Portuguese Data Protection Authority or DPA (CNPD)
- Knuddels.de vs. The State Commissioner for Data Protection and Freedom of Information Baden-Wuerttemberg (LfDI) in Germany
- The Austrian DPA (DSB) vs. an Unnamed Limited Liability Company

16:00



#### **Resolving Compliance** Dilemmas and Potential **Conflicts of Interest**

At this unique session, experts will discuss their approaches to navigating grey areas. Topics to be covered include code of conduct breaches, business relationships with SOEs, government officials during public tender processes, former government official, an employee's family member owning the supplier, and hiring former or retired government officials. The panel will include a special focus on relevant jurisprudence about recent cases.

**Conference Adjourns** Sponsored by



#### **MAIN CONFERENCE DAY 2**

iii Thursday, 30th January 2020

Registration & Welcome Coffee

08:30

#### **Opening Remarks from the Co-Chairs**

08:45 SPECIAL REMARKS

#### The Serious Fraud Office Going Forward



Peter B. Pope Partner

Jenner & Block (UK)
Recently returned from a secondment to the UK Serious Fraud Office, where he served as International Liaison and Investigations Advisor

International cooperation and what the Serious Fraud Office is looking for/expects from the outside world.

09:30



#### CORPORATE COMPLIANCE PROGRAMMES #2

**Operationalising Your Compliance Programme: Dovetailing Your** Program, Data Governance and Reporting with the Overall **Business Strategy** 



Camilla Nyhus-Møller Chief Legal & Compliance Officer Höegh LNG AS (Norway)



Mark Butler Chief Compliance Officer **Nordic Investment Bank (Finland)** 

- How to meet prosecutors' expectation of companies to operationalise your compliance programme
- Developing a sustainable strategy to assign clear responsibilities and accountability to demonstrate compliance
- How to leverage existing compliance systems and processes, and upgrade them to generate data and flag suspicious transactions
- Updating protocols for payments, third parties, gifts, travel, and entertainment, charitable and political contributions
- The ROI of Data analytics, AI and other innovation
- Developing "Ethics Ambassadors" for your organisation
- Training officers, directors, employees, agents and business partners
- Addressing specific cultural nuances when localising your new strategy

10:30 Morning Networking Break

11:00





### **DEFENCE COUNSEL WAR STORIES**

Structuring and Managing the Costs of Multi-Jurisdictional Investigations



Gareth Rees, QC Partner

King & Spalding International LLP (UK)



Anne Gaustad Partner **Hughes Hubbard & Reed LLP** 



Esther M. Flesch Partner - Founder Flesch Advogados (Brazil)

Tom Best Partner Paul Hastings (USA)

Defence counsel on this panel will give real-world examples of a multi-jurisdictional investigation and how best to manage them in a context where risk factors are multiplying, overlapping and becoming more uncertain:

- The challenges of coordinating with several authorities: Best practices for communicating with foreign authorities
- How an agreement in one jurisdiction can affect a company's activities in other key markets
- How local laws can restrict the internal investigation and ability to cooperate with the authorities: GDPR, Blocking Statute, employment law, professional secrecy, evidence-gathering, and more
- When the DPA with the DOJ/SFO and/ or a press release can supply important information for foreign authorities concerning corruption in their respective jurisdictions
- · When multi-jurisdictional investigations for corruption allegations trigger prosecutions for fraud, money laundering and personal data protection violation — and vice versa
- The impact of asserting legal privilege across jurisdictions
- How can the risk of a multi-jurisdictional investigation impact your disclosure calculus?

12:15



#### COUNTRY SNAPSHOT # 2 **RUSSIA SANCTIONS**

How to Leverage the Tools in Your Compliance Programme to Manage Sanctions, Trade and More Geopolitical Risks



Vladimir Efremov Partner Baker & McKenzie - CIS, Limited

New for this year, industry experts will discuss the impact of Russia sanctions on compliance in the Nordic region. Don't miss a comprehensive update on important new developments of the past few months, recent actions involving Russia and practical insights on how economic sanctions fit into compliance risks for Nordic multinational companies.

12:45 **Networking Luncheon** 

#### The Working Environment Act Chapter 2 A on Whistleblowing: How Industry is **Changing Reporting Systems to Reduce Enforcement Risks**



Hanne Margrethe Meldal Senior Legal Advisor **Ministry of Labour and Social Affairs** (Norway)



Tron Dalheim Partner Thommessen (Norway)

- The scope of the whistleblowing regulations is expanded: Who is now covered?
- How to handle and process whistleblowing notifications going forward
- · What is regarded as retaliation: An extended and detailed list
- · What "censurable conditions" means today and what is the impact on the employee's notification procedure?

- . How to deal with the right offered to employees to notify internally to supervisory authorities and, externally to the media or the public in general
- Setting up multiple channels for employees to report wrongdoing
- New rules regarding liability in relation to an employee subjected to retaliation: How the culpability of the employer will now be assessed?

#### 14:45





exchange views, debate questions and share experiences around current industry challenges.

#### #3 Crisis Management

#### Post Crisis Management & Compliance Certification - A Monitor's Perspective



Dominique Abrokwa Partner **Pohlmann & Company** 

#### **Crisis Management**

- Establishment of "situation room" and project management
- Defining what the risks and opportunities of your external and internal communication strategy should be
- · At what point communicating with customers and the authorities about the incident is productive or counterproductive?
- Examples of the good, bad and ugly in crisis PR
- Representation of the company vis-à-vis the investigating authorities
- Risk analysis and implementation of mitigating measures

## Certification in light of Compliance Monitorships – A Monitor's Perspective

- The role and activity as Independent Compliance Monitor, e.g. for the U.S. Department of Justice, the U.S. Securities and Exchange etc.
- The life cycle of a compliance monitorship incl. preparation for and during compliance
- Certification criteria; Voluntary compliance monitoring; The phase out and closure of compliance monitorships

#### #4 Compliance Training for Sales Functions

#### What an Impactful Training Programme **Looks Like Now**



Jeppe Kromann Haarsted Group Compliance Manager FLSmidth A/S (Denmark)

- The types of compliance training that are tailored to the specificities of the sales functions
  - » Fast employee turnover
  - Incentives and rewards
- Components of the KPI that maintain the right balance between making deals and remaining compliance
- Fostering and sustaining a strong ethical sales culture







#### 16:15

#### HYPOTHETICAL EXERCISES



What Would You Do If... **How to Resolve Gifts & Hospitality** Dilemmas on the Ground



Laila Sivonen Senior Associate Roschier, Attorneys Ltd. (Finland)



Hanne Sønderland Manager, Compliance & Internal Controls, Digital Protection Officer Anti-Money Laundering Officer Fjord Line AS (Norway)



Maria Rabben Ethics and Compliance Advisor Aibel AS

Take the pulse of the audience on a series of scenarios and discover how they respond to these challenges and ensure that the compliance programme is properly implemented as it evolves to deal with multiple new risks.

The polling results will be shared in real-time and the panel of experts will provide practical comments

- · Navigating the line between hospitality vs.
- · Giving, receiving, accepting and refusing gift, hospitality and entertainment:
  - » Determining your organisation's boundaries
  - How it is communicated to people in locations you are operating in?
- Sponsorship and donation: How to respond to solicitations from customers, suppliers, foreign government officials and more
- Third party vendors: When you need to use vendors to handle your marketing and business developments activities
- Commission payments, petty cash activity and cash advances

#### **Conference Concludes**

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#### **Delegate Substitutions and Cancellations**

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All cancelled conference registrations will be subject to a cancellation fee of £250 and applicable VAT. If the conference currency is EUR or USD a €350 and applicable VAT or \$350 cancellation fee will apply.

Any product extensions (inclusive of workshops recentions masterclasses etc.) will be subject to a cancellation fee of £40 and applicable VAT. If the conference currency is EUR or USD a €50 and applicable VAT or \$50 cancellation fee will apply. If you prefer, you may request a refund of fees paid less the applicable cancellation fee. No credits or refunds will be given for cancellations received within 10 days of the conference start date. No liability is assumed by C5 for changes in program date, content, speakers or venue. C5 reserves the right to cancel any conference it deems necessary and will, in such event, make a full refund of any registration fee but will not be responsible for airfare, hotel or other costs incurred by registrants.

6th Annual Conference on

# **Anti-Corruption NORDICS**



🛗 29 – 30 January 2020 | 🗣 The Clarion Hotel Oslo, Norway

#### **C5 Communications Limited**

4th Floor, Tallis House 2 Tallis Street, London EC4Y 0AB

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