

# altis

ADVANCED LEGAL TRAINING

On-line **competition law**  
**compliance** training programmes



# 1.

More than 100 countries around the world have already implemented a competition law regime, while some 20 more are in the process of doing so. Competition law compliance should therefore be at the heart of every company's risk management strategy.

## Introduction



**altis** – online competition compliance training programme for non-lawyers:

“ Cost effective, easy to use. ”

“ The key points which make this a market leader are customisation and also online management, making it easy to use for the non-legal mind. ”

FT Innovative Lawyers, Use of Technology Stand-Out Innovations, FT Special Report, June 2006

Competition law breaches can have far-reaching consequences for companies, their employees and, ultimately, their shareholders, including:

- heavy fines
- reputational damage
- public and private lawsuits
- criminal sanctions (including imprisonment)
- disqualification of directors
- a significant drain on management and financial resources in handling a breach of competition law case

Effective compliance programmes significantly reduce the risk of breaching competition laws. However, in many jurisdictions, even if a breach occurs, the degree to which your company can demonstrate a genuine commitment to competition law compliance may be an important factor when the regulatory authorities determine the severity of any penalties imposed.

The traditional corporate approach to competition law compliance has been to circulate a hard-copy compliance manual and to periodically to hold compliance seminars.

This approach has the following significant limitations:

- > **coverage:** in a geographically diverse company with an ever-changing employee base, it is difficult to ensure that all employees have received compliance training
- > **relevance:** multi-product companies need a range of compliance training tools to reflect the different competition issues facing different business divisions. Training is more effective if case studies can be tailored to the products/services and situations commonly encountered by the relevant business division
- > **updating:** maintaining hard-copy manuals and providing face-to-face training can be difficult or, at the very least, expensive
- > **monitoring:** companies increasingly need to be able to demonstrate to the regulatory authorities that internal compliance training has included some degree of 'check/audit' that personnel have understood the issues. Yet written tests are often unpopular with employees

This is why **Freshfields Bruckhaus Deringer** and **Interactive Dialogues** have developed **altis**, cost-effective, easy-to-use on-line competition law compliance training programmes for employees without any legal training throughout your company.

altis

# 2.

Written in a non-technical, user-friendly style, these on-line training programmes provide users with an explanation of relevant legal principles, real-life examples and practical scenarios that employees may encounter. Key summaries of useful tips and test questions at the end of each section reinforce the users' understanding of the relevant legal principles and ensure that they know when to contact their in-house legal department on particular issues.

## Benefits



The benefits of the **altis** on-line competition law compliance training programmes include:

- > comprehensive content covering anti-competitive agreements, abuse of a dominant position, the consequences of breaching competition law, investigations and compliance procedures
- > special versions of the training programmes, designed to be used in conjunction with traditional classroom training (blended learning approach)
- > flexibility to customise legal content and case studies to meet your company's exact requirements
- > practical interactive exercises and associated test questions randomly generated for each section
- > global access at any time by simply logging onto the Internet or Intranet
- > detailed reports that can be generated for the whole company, business divisions or individuals to prove that comprehensive compliance training has taken place and to identify levels of risk within your company
- > automatic e-mail alerts that can be sent to remind users who have not completed the programme and to retest users' understanding of competition laws
- > no complex technologies to install. The technical requirements are Pentium 1 PC or above, Windows 98 operating system or above, Javascript enabled, Internet Explorer 4.0 or above, Firefox and Netscape 6.0 or above and screen resolution 800 x 600 (SVGA) or above
- > cost effectiveness – **altis** aims to offer the benefits of e-learning at the lowest possible cost to your company

The **altis** reporting function allows your company's compliance officer to pinpoint particular areas of risk or lack of understanding, thus helping to ensure that periodic face-to-face compliance seminars can immediately focus on the issues that are important to your company. **altis** therefore helps your company to optimise the deployment of financial resources and executive time to achieve effective compliance.

# 3.1

The following screenshot gives you a flavour of the altis on-line competition law compliance training programmes.

## Interactive exercises

The screenshot shows a web-based interactive training module. At the top, it says 'INTERACTIVE DIALOGUES' and 'Why compliance is important financial consequences of non-compliance'. The main text explains that failure to comply with European competition law could have severe financial consequences for a company named ABC, and that fines are a percentage of global turnover. It asks the user, 'What do you think the maximum percentage is?' and provides instructions to use a sliding scale. Below this is a vertical scale from 0 to 25 percent, with a slider set at 10%. Next to the scale is a 3D pie chart with a green slice representing 10%. To the right, there is an image of several 100 Euro banknotes. A 'Feedback' box states: 'As you can see, the current maximum percentage is 10%. For your information, in 2006, this would have amounted to a fine of €xx.xx million for ABC.' Below that is an information icon with the text: 'Click the information icon to read about a real world example.' At the bottom, there are navigation buttons (back, forward, home, search) and a progress indicator showing '8/58' and 'Click Next to continue.' The browser's address bar shows 'Internet'.

# 3.2

The following screenshot gives you a flavour of the altis on-line competition law compliance training programmes.

## Scenarios

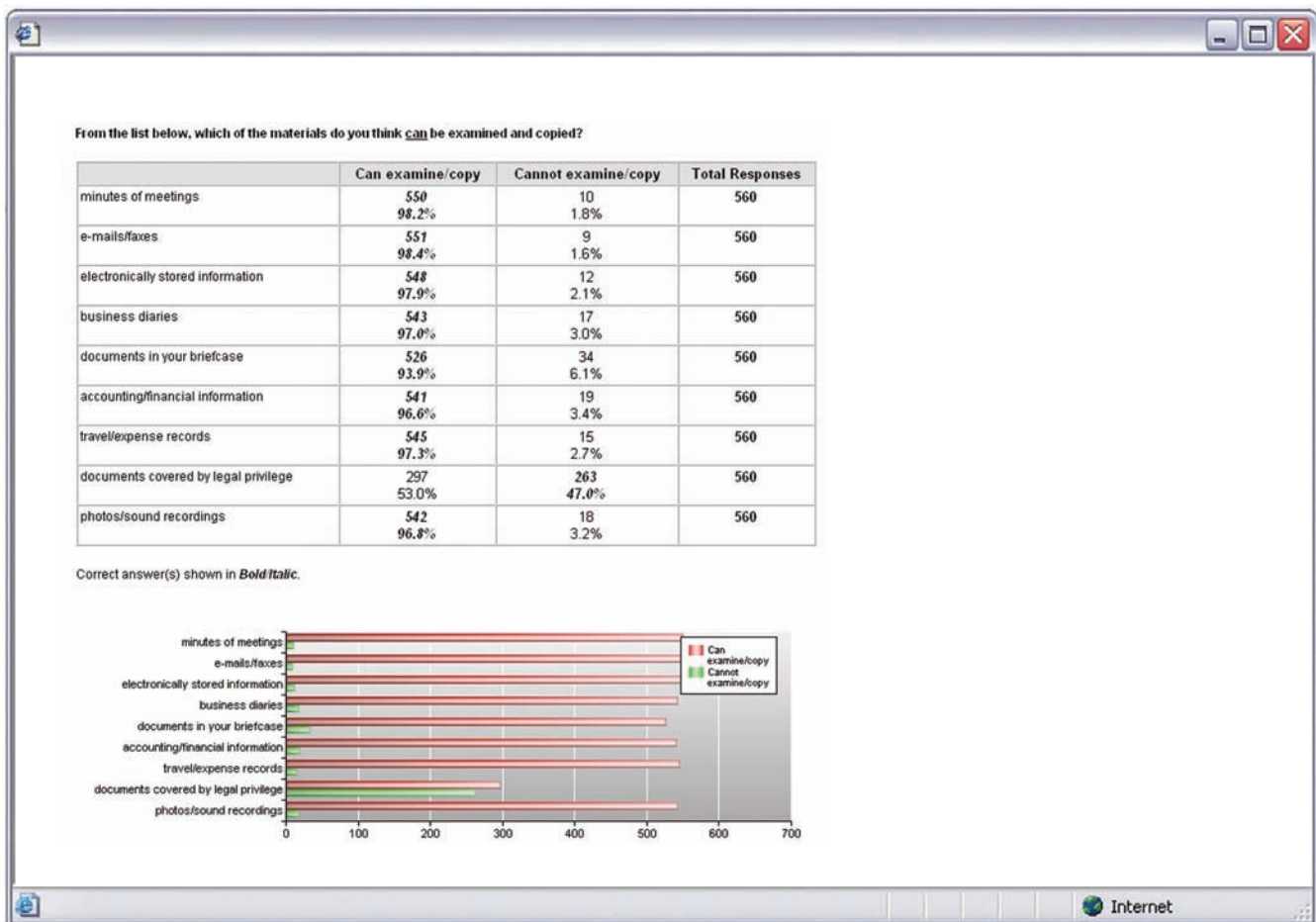
The screenshot shows a web browser window with the following content:

- Header:** INTERACTIVE DIALOGUES | Horizontal agreements market sharing - scenario
- Text:** Suppose you meet a competitor at a trade show. While discussing business issues, you both agree to divide the market geographically in order to resolve some of the difficulties you are both facing.
- Image:** An illustration of two stylized human figures (one brown, one green) standing on a world map. A red circle with a diagonal slash and the word "UNACCEPTABLE" is overlaid on the map.
- Text:** You both believe that this will also benefit the customers, as you will both be able to apply your resources to a smaller area.
- Question:** Is this acceptable behaviour?
  - Yes
  - No
- Feedback:** The answer is **No**. This is **market sharing**, which is illegal. Even an informal meeting with a competitor to discuss such issues may lead to fines.
- Information:** Click the information icon to read about a real world example.
- Navigation:** A bar at the bottom contains icons for close, help, and menu, followed by the text "Click Next to continue.", and navigation arrows with the page number "16/58".
- System:** The Windows taskbar at the bottom shows the "Internet" browser icon.

# 3.3

The following screenshot gives you a flavour of the altis on-line competition law compliance training programmes.

## Comprehensive reporting functions



# 4.

A little background information on  
Freshfields Bruckhaus Deringer and Interactive Dialogues.

## About us

“Once again, we are delighted to recognise Freshfields Bruckhaus Deringer... This is the second year running that the firm has achieved this distinction, and the firm can boast outstanding individual talent across multiple jurisdictions. It can truly be said to be the world’s leading firm for competition expertise.”

Who’s Who Legal, press release, April 2006

“Interactive Dialogues are one of the most customer focused and supportive organisations that I have dealt with in 25 years of business. Any issues that we raise, such as modifications to the software to better reflect our needs, are immediately addressed.

Their software is well thought through and adaptable. Interactive Dialogues consider themselves fully accountable for their operation.”

Global Fortune 200 client since 2001

### Freshfields Bruckhaus Deringer

Freshfields Bruckhaus Deringer is a leading international law firm. With over 2,500 lawyers in 28 offices around the world, we provide a comprehensive worldwide service to national and multinational corporations, financial institutions and governments.

Our antitrust, competition and trade (ACT) practice has more than 245 specialists based in 16 countries in Europe, the US and Asia. We advise on a complete range of antitrust, competition and trade issues including merger control, licensing and distribution, competition compliance, restrictive practices, abuse of dominance, cartel investigations, state aid, liberalisation, privatisation, public procurement and trade including WTO matters. The ACT group enjoys an excellent reputation and is widely recognised as a pre-eminent practice by leading guides, directories and other publications. Most recently, we were named ‘Global Competition Law Firm of the Year 2006’ for the second consecutive year by Who’s Who Legal and ranked as the top competition law practice globally, for the third consecutive year, in PLC Cross-border magazine’s ‘Competition Super League’. Our ACT practice also topped the 2006 Global Competition Review ‘GCR 100’ clients and competitors survey, in which in-house counsel were asked to name their ‘preferred competition law firm’ and competitors their ‘biggest rival in competition’.

### Interactive Dialogues

Interactive Dialogues, a private company with offices in Guildford and Brussels, have helped numerous Fortune 500 clients to implement comprehensive on-line compliance training programmes throughout their global companies.

We provide our clients with an advanced on-line Dialogues Management System to create, deliver, track and report a wide range of compliance materials, which enables companies to achieve the high levels of compliance demanded by corporate management and regulatory authorities.

## Further information

For further information and a demonstration of **altis**, please contact:



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