



## Newsletter August 2023

Dear Member,

Please find hereafter the VCO newsletter for August 2023, including:

- An extra General Assembly live event
- The VCO Advisory Board: Meet Alexander Maclean
- Sign up for the ESG event with AFM experts
- Other interesting news from the Expert Groups Behavior & Culture and the Accountancy Sector

If you have news that you would like to share with all members, please send your contribution to [info@vco.nl](mailto:info@vco.nl) with the subject "news item" and/or use our LinkedIn group. We highly appreciate your contributions!

## NEWS FROM THE BOARD

We hope many of you enjoyed a pleasant vacation. During mine, amidst enjoyable (family) activities, I also pondered a case recently presented to me by an associate. This person is the initiator of a Foundation for Ukraine that "provides goods to locals." With good intentions and enthusiasm, they opened an account with a Fintech. However, a few weeks ago, this account was abruptly terminated. There was a brief explanation, lacking substantial content or professional communication. The initiator was completely bewildered. Was this justified or not entirely unjust? I wrote a blog about it during the ride to the second vacation location. It will soon be published on the VCO website!

Angela, Arnout, and Bernadette, the other board members, have been diligently working on VCO operations. As the coming month holds a lot in store, including:

- ESG Event with AFM guest speakers on September 11th
- Second General Assembly, financial matters;
- Quarterly meeting with Expert Groups chairs;
- Establishment of a Foundation for potential registration;
- Continuation of the Taskforce Professionalization of Professional Organizations;
- Quarterly meeting with the Advisory Board;

- Formalization of Partnership policy and strategy led by the Partnership Committee;
- Preparations for Integrity Week, as VCO is a partner in this initiative organized by the [ICC](#);
- Reviewing input for the VCO's Risk & Compliance workshop on November 7<sup>th</sup>;
- And more...

Would you like to contribute to our growing activities or have you written an interesting blog? Send us a message at [info@vco.nl](mailto:info@vco.nl), and we'll be happy to get in touch.

Warm regards,  
Michelle Fisser  
Chairperson

## **Extra General Assembly**

As decided during the previous General Assembly on July 6th, 2023, the decision-making on the financial matters of the VCO and the membership fee increase will take place in an extra General Assembly. This financial General Assembly can be attended both physically and online. This complies with our (legal) statutes and makes it as easy as possible for members to participate.

When: Thursday, August 24th, 2023, 8:00 PM

Where: Vrije Universiteit Amsterdam - De Boelelaan 1105, Main Building 2A00 (second floor), and also accessible and votable via 'teams.'

The board cordially invites you to attend!

Click [here](#) for more information about the General Assembly.

Click [here](#) to directly register for the General Assembly.

## **Meet Alexander Maclean**

The VCO has an Advisory Board; broadly and multidisciplinary composed. The purpose of the Board is to provide the board with both solicited and unsolicited advice and elevate the VCO with suggestions and brainstorming. Over the coming months, you will get to know all five members. This month, it's Alexander Maclean's turn. Alexander is the Global Head of Compliance (and Chief Compliance Officer) at Aegon.

Read the interviews [here](#)!

## **NEWS FROM THE EXPERT GROUPS**

### **ESG EXPERT GROUP**

PARTICIPATE IN THE ENGLISH SEMINAR WITH AFM EXPERTS

How are major companies preparing for the European requirements regarding sustainability reporting? And will they be ready to meet the new rules on time? In the Netherlands, it is already expected that between 3000 and 6000 companies will need to comply with the CSRD (Corporate Sustainability Reporting Directive) and ESRS (European Sustainability Reporting Standards).

When: Monday, September 11th, 2023 (4:00 PM - 6:00 PM)

Where: Pharos building (Farm Kitchen), Mercuriusplein 1, Hoofddorp

Register [here!](#)

## **Behavior & Culture Expert Group**

Is the content of your compliance program relevant enough?

Recently, KPMG, the accounting firm, made headlines due to widespread exam fraud. Newspapers and television covered the news, and the chairman of the Board of Supervisors, mr Van Boxtel, resigned. He stated he was leaving "out of integrity." He himself had also received assistance in creating online training on privacy aspects.

Meanwhile, AFM had already criticized the quality of supervision by accountants last month ([Investigation: "Sharper on fraud risks," AFM](#)).

In response to the exam fraud, AFM emphasizes a change in behavior and culture within the sector. Reports of insufficient discipline in performing mandatory training by employees have been made before. AFM says, "Exam fraud is all about behavior and culture. We will closely monitor the necessary behavioral change and ensure it is implemented as quickly as possible. We strongly urge employees in the sector to proactively report misconduct." For the compliance officer, several aspects of this case are recognizable and interesting. There might be a lack of appropriate role modeling. Even the Chairperson of the Board of Supervisors had someone else complete the training. Secondly, there seems to be a lack of enforcement. And a third element that might contribute to the problem is that employees do not find the training content relevant enough.

From the KPMG case, there were indications that many employees see mandatory training as a kind of "chore"; they find the content is of too low of a level, the format dull, and the applicability insufficient. In a sense, they seem to feel "too good" to invest time in the training, as apparently other matters are more urgent and important. Van Boxtel had to attend an

"important meeting," according to the FD, and therefore couldn't take the test.

As a compliance officer, you play a vital role in ensuring that compliance is taken seriously within your company. "Blindly ticking off" checklists or training doesn't achieve the desired effect. You need to find a way to resonate with colleagues both intellectually and emotionally. The time you ask from people in your organization to maintain the right knowledge and skills must be worthwhile. To achieve that, it's important to test training, communication programs, or compliance sessions with people from the business. Organize a try-out of your session and request targeted feedback. Ensure that the communication and content of training align with the level of your audience. The content should be sufficiently relevant and challenging. Also, after a session, ask participants for feedback. What did they find interesting, and what didn't resonate? Based on this feedback, you can further improve the quality of the compliance program.

The Behavior & Culture Expert Groups of the VCO has created a [toolbox](#) with concrete tools to help enhance aspects of behavior and culture in your organization. There are several tools available that align with elements of the aforementioned case. Explore the toolbox for tools that could be relevant to your organization. Consider tools such as:

- Tool 3: Make compliance personal
- Tool 16: Conduct a culture measurement
- Tool 37: Enhancing the impact of role modeling

Review the tools and make use of the tips. They can help improve the value, and thus the relevance, of your compliance program.

## **Accountancy Sector Expert Group**

The Accountancy Sector Expert Group introduces itself: A unique Expert Group with shared ambitions.

Some time ago, an initiative was launched by compliance professionals at accounting firms to establish an association, enhance professionalism, and, equally important, develop standards and professional ethics; we aspire to create a professional institute. From that initiative and shared ambition, a connection was quickly made with VCO. Within VCO, our initiative took the form of a dedicated Expert Group.

Why a dedicated Expert Group? What sets the compliance professional in the accountancy sector apart?

The compliance officer role in accountancy emerged due to the introduction of the Law on Audit

Firms Supervision (Wta), which mandates a compliance officer and substitute compliance officer for accounting firms licensed for auditing listed companies, banks, and a few other specific categories. The compliance officer quickly became a common feature for all Wta-licensed entities. Other regulations such as the Wwft and AVG also make the presence of a compliance function necessary or at least desirable.

This applies to a wide range of accounting and advisory services. The compliance professional deals with audit, compilation, and tax advisory practices. Other advisory services often come into play as well, including IT audits, Corporate Finance, payroll processing, and more.

Relevant regulators in this sector include the AFM for organizations with Wta licenses, the BFT and NBA, and potentially the SRA. Additionally, the compliance professional interacts with other regulators such as Norea, NOB, the Register of Tax Advisors, and the Dutch Data Protection Authority.

The compliance function in accountancy has evolved over the past 15 years. The focus often lies on the quality of products/services and their creation, rather than solely on the organization's quality. In smaller firms, the role is often combined with a management and/or signing/external auditor role. Even in mixed practices, the emphasis is primarily on auditors, particularly within the audit practice. In larger firms, the function is often a department that maintains some distance from the audit practice. Sometimes, the Wta supervision function is fulfilled from a third line perspective, in addition to the compliance function in the second line.

### **Shared Ambition with VCO**

Compliance is a profession. It requires specific knowledge and skills. Yet, for compliance professionals in the accountancy sector, there is currently no specific (comprehensive) education and limited other training opportunities. VCO recognizes this and shares the same ambition (toward certification). In practice, this means that professionals come from diverse backgrounds and training. A common body of expertise is lacking. Agreement on a basic set of values that support a shared professional ethic is also absent. This results in a lack of several foundational elements that one would expect to find in a profession.

For accounting firms and regulators, understanding a minimum set of knowledge, skills, and norms that a compliance professional should possess is important. An independent professional institute is crucial for this purpose, and VCO plays a role in achieving that.

### **In Conclusion**

Our shared ambition is to contribute to the professionalization of the compliance function in the

accountancy sector and, more broadly, to gain overall recognition for the compliance function across VCO. We aim to have an impact on the development of this valuable profession and to contribute to the future of and trust in accounting firms.

## **LinkedIn**

Stay up-to-date on VCO activities and current events through the VCO LinkedIn group of which you can become a member: <https://www.linkedin.com/groups/2981559/>

And the VCO LinkedIn page, which you just need to start following:

<https://www.linkedin.com/company/vereniging-van-compliance-officers>

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