



CASE STUDY:

CPV “Integrity Beyond Reproach”

Competitive Power Ventures' (CPV) mission of modernizing U.S. power generation means developing the most efficient, economic and environmentally responsible power projects in the world. That mission is founded on good governance and ethical behavior.

CPV's commitment to good corporate governance is based on the CPV [Code of Business Conduct and Ethics](#) and CPV's Core Values: Teamwork; Ethics & Integrity; Accountability; Motivation; and Safety. Together these values inspire and inform CPV's business practices, making sure that trust and transparency remain at the forefront of all business operations.

Under the direction of its Chief Compliance Officer, CPV's robust compliance program utilizes innovative solutions unique to CPV, scaling best practices in compliance, which often require the resources of much larger organizations to fit a company with fewer than 100 employees. CPV's compliance programs aim for “integrity beyond reproach,” with the understanding that compliance is not only necessary, but also a competitive advantage by reducing risk and promoting efficiency.

CPV's current compliance program focuses on a process for annual risk assessments, using interviews with every member of the management

team to develop a comprehensive “heat map” for potential risks. CPV has four lines of defense for each risk: policies, controls, training and technology. By identifying risks early, the corporate compliance team is able to proactively mitigate possible problem areas and keep the company running smoothly.

The program empowers individual employees to participate in the company's compliance efforts. Instead of solely relying on the compliance department, CPV has made compliance a necessary component of every employee's job, instilling in them the need to consider the ethics and legality of every process and action they undertake. CPV also has an anonymous ethics hotline for any employee to report possible violations, risks, or concerns.

By emphasizing the importance of compliance and high ethical standards at all levels of the company, CPV has fostered a culture of compliance, where every employee is held accountable for his or her actions. Through its commitment to compliance, CPV ensures its operations are based on the most efficient, rigorous, and transparent practices in the industry.

Below are some additional components of the compliance programs that help CPV achieve its mission:

- CPV's Corporate Compliance Program aligns with the Department of Justice's elements of an effective compliance program.
- All processes are assessed and modified based on risk level. For instance, a small, routine vendor payment requires fewer signatures than a large, one-time expenditure.
- Every employee is trained to use an ethical decision tree to help align decisions with company policy, regulations, personal values and other criteria.
- Every office displays posters illustrating three actions employees can take to keep CPV compliant:
 1. Don't go it alone.
 2. Think ahead.
 3. Speak up.
- CPV also extends its high standard of accountability to vendors, requiring all contractors and other partners act in full cooperation with CPV's compliance programs.
- Every year, CPV facilitates a full review of its Code of Business Conduct and Ethics for every employee.

