

### 1.3 Checklist for an effective compliance program

- ☐ Has someone been given overall responsibility for Oilcode compliance?
  - Does that person have sufficient ‘clout’—or access to a person with the authority—to ensure that Oilcode obligations are carried out?
  - Has a compliance plan been developed covering such things as:
    - roles and responsibilities of people implementing various aspects/procedures in relation to the compliance program
    - timelines when Oilcode obligations are to be carried out
    - resources to be applied in the compliance program
    - priorities
    - how compliance obligations will be embedded in operational practices and procedures
    - processes for identifying, reporting and responding to compliance failures?
- ☐ Has the compliance officer systematically worked through the Oilcode to determine what aspects of the Oilcode apply to your organisation and in what circumstances?
- ☐ Have workable Oilcode procedures, practices, documentation or processes been developed for those circumstances where the Oilcode applies?
- ☐ Has a system (e.g. responsibilities and timelines) to implement these procedures, practices, documentation or processes been put in place?
- ☐ Has a visible and accessible means to deal with complaints from fuel buyers been set up? Does the person dealing with complaints have the appropriate negotiation/dispute resolution skills and authority to deal with complaints?
- ☐ Has the compliance officer set up an Oilcode record keeping system?
- ☐ Has the compliance officer set up a monitoring program to ensure compliance with procedures, practices, documentation or processes?
- ☐ Does your program include procedures for continual improvement (e.g. audits and preferably external reviews)?