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Phone: +1 646 783 7100 | Fax: +1 646 783 7161 | customerservice@law360.com

8 Compliance Team Strategies To Support Business Agility

By **Theodore Edelman** (August 27, 2025, 2:08 PM EDT)

Theodore Edelman

With almost dizzying regularity, enforcement authorities around the globe proclaim new compliance initiatives and requirements, prompting advisers to urge companies to bolster controls, expand headcount and deepen safeguards.

For example, in its September 2024 update to the Evaluation of Corporate Compliance Programs, the U.S. Department of Justice **underscored** the need for companies to incorporate governance and risk-mitigation measures for emerging technologies such as artificial intelligence.[1] And its May **revisions** to the Corporate Enforcement Policy reinforced that prosecutors will weigh how well a compliance program is designed, resourced and operating in practice when making charging and resolution decisions.[2]

In the U.K., the Serious Fraud Office **launched** a new anti-corruption task force with France and Switzerland in March.[3] And in July, the U.K.'s Financial Conduct Authority **published** a new rule amending its Code of Conduct to address serious nonfinancial misconduct for nonbanks.[4]

The list, and corresponding calls for corporate compliance enhancements, appears endless.

Even the most well-resourced teams, however, must contend with significant constraints: finite budgets, limited bandwidth and an imperative to remain competitive. Reflexively equating more with better can create controls that are duplicative, overly burdensome or misaligned with operational realities — delaying transactions, alienating employees and wasting resources.

Such changes are likely to be counterproductive. Compliance mandates must be dynamic, not ossified obstacles that stifle legitimate business activity.

This article is not about letting suspected breaches slide or looking the other way to avoid holding business units to their legal and ethical obligations. Rather, it advocates for designing thoughtful, risk-aligned guardrails that help business leaders achieve their commercial objectives lawfully, instead of defaulting to wholesale prohibitions or cumbersome protocols that smother competitive opportunities and hinder legitimate business.

Sustainable compliance embeds safeguards that enable, not paralyze, business operations. What follows are specific, actionable and balanced suggestions for crafting compliance functions that support legitimate business activity, rather than obstructing it.

1. Prioritize risk, not optics.

Effective compliance begins with a risk-based focus. Broad-brush efforts and generic policies may appear robust on paper, but often miss the mark in practice. No matter how elaborate, compliance programs court failure if they do not target the risks and challenges a company faces. And those risks might well vary among business units and regions.

Proposed Steps

- Conduct a structured, cross-functional risk assessment mapping business activities to regulatory exposure across all relevant operations.
- Involve legal, compliance, operations, finance and regional business leaders, who experience risks daily and can ensure controls are realistically and properly tailored in each of the company's business units and geographies, and do not unnecessarily hinder activity.
- Identify risk hot spots — e.g., third-party intermediaries in high-risk jurisdictions, supply-chain vulnerabilities and data localization constraints.
- Evaluate the effectiveness of current controls and resource sufficiency, and recalibrate based on real impact and probability.
- Identify precisely where additional support — both people and tools — will deliver real value.
- Adopt a uniform, objective scoring model to ensure resources are allocated efficiently based on genuine need, not optics or diffuse hand-wringing.
- Incorporate "near miss" incident analyses of events that almost caused violations into risk reviews to identify vulnerabilities before they result in enforcement matters.
- Maintain an internal risk heat map dashboard that is accessible to business leaders for ongoing visibility and updating of risk priorities.

2. Use existing assets before adding new ones.

The knee-jerk reaction to rising expectations might be to hire more staff, completely outsource program design, or purchase new tools and systems. Sometimes that is necessary, but it should follow a clear determination that existing resources cannot meet the need.

Proposed Steps

- Critically evaluate whether current personnel, systems and tools can be adapted or repurposed to meet requirements.
- Enhance internal audit teams, who typically focus on financial issues, to spot compliance issues — e.g., bribery, collusion or export violations — with targeted training.
- Adapt contract management or vendor-onboarding systems to include third-party risk and sanctions checks.
- Temporarily deploy compliance staff to high-volume business units or special projects, with clear deliverables and sunset criteria to avoid expansion creep or permanent bloat.
- Develop a cross-training program so business and compliance personnel can collaborate realistically and effectively on controls that cover actual risks, and promote legitimate trade and competition.
- Establish a "compliance SWAT team" of cross-functional staff who can be assigned quickly to urgent compliance needs.
- Maintain an inventory of unused or underused features in existing systems to maximize return on prior investments.

3. Embed controls where business happens.

Controls are most effective when they are seamlessly embedded into business processes, not layered on as external constraints. When controls are poorly designed, implemented in isolation or imposed from on high, they are more likely to be circumvented, ignored or resented — converting the solution into yet another problem.

Proposed Steps

- Integrate compliance into transaction planning and structure from the outset, rather than as a belated check that could be seen as a bar or obstacle to company plans.
- Embed preclearance prompts for gifts, travel and entertainment within expense systems.
- Include conflict-of-interest checks in customer relationship management or procurement tools.
- Include attestations in digital approval processes to capture compliance certifications in real time.
- Involve process owners — the personnel who will have to operate under and comply with compliance systems — in designing the integrations to ensure minimal disruption and maximum alignment.
- Conduct walk-through simulations or stress tests with frontline personnel to ensure that embedded functions operate in real-world conditions without impeding legitimate operations.
- Allow compliance staff to conduct day-in-the-life shadowing of business units to maintain practicality and alignment.

4. Empower business units to be compliance champions.

Programs succeed when business leaders accept responsibility for compliance in their areas. When controls are perceived as externally imposed, business units may disengage or view compliance as a roadblock to be avoided, or worse, resisted.

Proposed Steps

- Involve operational leaders in policy development and implementation to ensure controls are realistic and integrated into the workplace and company ethos.
- Assign ownership of compliance procedures — e.g., third-party onboarding, marketing reviews, etc. — to the functions that execute them.
- Include compliance performance in metrics and incentive structures for personnel evaluations.
- Recognize and reward teams that find innovative ways to achieve business goals while fully complying, visibly promoting the benefits of compliance success.
- Launch a peer recognition program in which teams nominate colleagues for contributions to compliant conduct.
- Rotate promising operational managers through short-term assignments in the compliance function.

5. Align compliance with commercial objectives.

Too often, compliance is viewed as a blocking function — the department that stops deals, delays launches, or imposes seemingly unnecessary or byzantine procedures. A robust compliance program that is mindful of commercial realities and seeks pragmatic solutions helps business personnel find a path to compliance.

When business units see compliance as a partner that helps find creative solutions to enable legitimate initiatives, rather than as an obstacle, they are more likely to seek its guidance early and follow its advice.

Proposed Steps

- Develop go/no-go decision frameworks with clear escalation guidelines for sensitive markets or transactions.
- Establish rapid review tracks for lower-risk matters to avoid unnecessary bottlenecks.
- Offer preapproved templates, checklists, due diligence tools and escalation pathways for time-critical initiatives.
- Partner with business units early in deal cycles and business development initiatives so compliance concerns are anticipated, not discovered at the eleventh hour.
- Conduct periodic — e.g., quarterly — pipeline reviews between compliance and business development functions to spot high-risk opportunities before substantial resource investments.
- Develop compliance playbooks for common transaction structures to streamline approvals and expedite reviews.

6. Apply technology thoughtfully, not just aggressively.

Technology can enhance compliance, but reliance on tools without process alignment can generate noise rather than insight. An effective compliance architecture uses automation to enhance coverage, not complicate execution.

Proposed Steps

- Tailor systems and tool usage to the company's actual risk exposure in specific regions and units, instead of defaulting to enterprisewide implementation.
- Deploy automated third-party screening tools that apply risk-tiering logic — for example, subjecting high-risk vendors in sanctioned jurisdictions, intermediaries handling large cash transactions, or agents providing government-facing services to enhanced due diligence, while applying streamlined checks to low-risk counterparties.
- Implement contract analytics platforms to flag deviations from approved terms.
- Use dashboards and exception reporting to identify problematic patterns and control gaps in real time.
- Pilot new systems in a single region or business unit before enterprisewide rollout to ensure it supports, rather than hinders, business flow.
- Require and document a business-case justification for each technology purchase, including the expected return on investment in risk reduction and efficiency gains.
- Establish sunset dates for pilot tools to foster a decision to continue, scale or drop them based on performance data, not inertia.

7. Conduct regular freshening reviews.

Controls developed in response to discrete issues, investigations or regulatory changes can become stale or linger beyond their effectiveness, leading to inefficiency and frustration. Programs should be periodically reviewed for relevance, effectiveness and efficiency.

Proposed Steps

- Conduct annual spring cleaning exercises to identify outdated, overlapping, or ineffective policies and procedures.
- Eliminate duplicative controls, e.g., multiple layers of preapproval for low-risk spending.
- Decommission legacy systems or protocols that no longer reflect the company's business model or regulatory environment.
- Pilot leaner control models for low-risk situations and markets, rather than relying solely on one-size-fits-all strictures.
- Track the cost in business hours of each major compliance process, and target the highest-burden, lowest-value controls for reform first.
- Conduct employee discussions and surveys to identify the most frustrating and inefficient processes as refresh priorities.
- Measure the actual preventative or detective success rate of each control to determine its value.

8. Manage regulatory expectations with substance, not symbolism.

More is not always better. Enhancements should focus on improving effectiveness and maximizing efficiency, not increases for the sake of addition. Regulators increasingly want proof that programs work in practice.

Proposed Steps

- Align compliance processes and investments with risk exposure, documenting the rationale.
- Test controls regularly for both compliance and operational efficiency.
- Be prepared to explain the scope and efficacy of the company's program, not just itemize its components, during regulatory inquiries.
- Respond transparently to breaches with candor, credible remediation and accountability.
- Maintain an evolving program showing how preventive measures and modifications have worked and supported legitimate business outcomes.
- Keep a compliance effectiveness file with concrete examples of violations prevented, compliant deals enabled and risks reduced.

Conclusion: Compliance as a Competitive Asset

Ultimately, there is no shortcut to balancing compliance obligations and commercial needs, but compliance need not stand as an obstacle to competitiveness. When properly designed, updated and implemented, a compliance program can enhance agility, promote ethical innovation and build stakeholder trust.

To achieve this, companies must move beyond checkbox compliance or reflexive initiatives and embrace a strategic mindset: Assess accurately, design intelligently, invest wisely, embed carefully and empower collaboratively. The goal is not to loosen safeguards; it is to apply them thoughtfully so that business leaders can achieve desired results ethically and efficiently, in keeping with commercial realities.

Theodore Edelman is a founding partner at Gold Collins Edelman Advisors.

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[1] U.S. Department of Justice, Criminal Division, Evaluation of Corporate Compliance Programs (Updated September 2024).

[2] U.S. Department of Justice, May 2025 revisions to the Corporate Enforcement and Voluntary Self-Disclosure Policy, Remarks of Matthew Galeotti, Head of Criminal Division (May 12, 2025).

[3] Press release, UK, France and Switzerland announce new anti-corruption alliance, (March 20, 2025).

[4] Financial Conduct Authority Consultation Paper 25/18, Tackling non-financial misconduct in financial services (July 2, 2025).