

Portugal: With regard to clients, who in their organisation should be ultimately responsible for compliance and why?

“Legal department, due to the fact that compliance officers/departments are quite uncommon. However, due to the fact that funds, banks, listed companies and financial institutions have been under the focus of regulators as a result of several compliance breaches, the tendency to create autonomous, and stronger, compliance departments has been significantly increasing.” **João Couceiro, partner, F. Castelo Branco & Associados**

“We believe that, whenever possible, it is most appropriate to have a specific team dedicated to compliance, or a compliance officer.” **Sofia Ferreira Enriquez, partner, Raposo Bernardo**

“An in-house legal department that would be responsible for dealing with most of the compliance problems of the company and coordinating work with external counsel is usually a good recipe.” **Ricardo Costa Macedo, partner, Caiado Guerreiro & Associados**

“In the case of credit and financial institutions, there are already specific internal departments responsible for ensuring compliance who report directly to a member of the board of directors. Regarding tax compliance, the finance director and the company’s chartered accountant are normally ultimately responsible for compliance. In the area of competition law, compliance is usually the responsibility of the person in charge of the relevant sales channel.” **Adelaide Moura, managing partner, A.M. Moura Advogados**