



Governance • Risk • Compliance

CURA SOFTWARE CASE STUDY

Sarbanes-Oxley Compliance: The Kellogg Company



Kellogg Company is the world's leading producer of cereal and a leading producer of convenience foods. It employs approximately 32,000 people, manufactures in 19 countries and sells its 1,500 products in more than 180 countries around the world. Sales totaled approximately \$12 billion in 2010.

Summary:

Kellogg Company chose Cura Software to automate SOX Section 404 compliance across the organization. With Cura, Kellogg Company has complete visibility into compliance operations, improved executive reporting and consistent documentation. These have been big wins for the compliance program.

Challenge:

Sarbanes-Oxley (SOX) Section 404 compliance is managed by Kellogg's global compliance SOX manager (who reports to the Corporate Controller) and six regional SOX 404 coordinators. At the time, Kellogg's relied on spreadsheets, word processors and other desktop applications to comply with SOX 404.

Process owners tested within individual business units throughout the organization; however, this decentralized control process resulted in a lack of visibility to the testing being completed. In addition, reporting was highly manual, tedious and time-consuming. There were additional challenges with consistency and quality of the data collected.

The company needed a solution that would automate Section 404 compliance, creating a consistent, global compliance program with better visibility, timely reporting, and the ability to leverage best practices.

As part of the selection process, the organization outlined important key features/functions, including a web-based interface, built-in document management, and management-level reporting.

"Cura is very flexible and adjusts to meet our needs."

*Nancy Dark,
Corporate Accounting: SOX Compliance*

The Cura Software Solution:

After a prolonged evaluation of the leading governance, risk and compliance (GRC) management vendors, Kellogg Company determined that Cura Software was the best fit for its requirements. Cura's flexibility enabled Kellogg to implement the solution using its current compliance process exactly. Cura could be configured to match their existing methodology, so no process changes would be required. Additionally, the Company noted that Cura's flexibility would lend itself to enhancing the compliance program over time.



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Software implementation began with an in-depth design phase which Kellogg believed was vital. During the first phase, Cura was deployed in the US, Europe and Canada. During the next phases, it was implemented throughout the rest of the world. Using web-based meetings, Kellogg Company initially trained approximately 200 users.

Results:

“The major benefit of Cura has been increased visibility for the Kellogg global SOX compliance manager, thus ensuring full compliance and a level of quality in execution. In the past, spot checks were conducted to ensure compliance. Now, there is 100 percent visibility across the company’s global operations in real-time and I am immediately alerted to those who have not completed deliverables timely or properly, and can help them with further training,” said Nancy Anne Dark, SOX Compliance Manager.

Another major advantage is Cura’s automated reporting. Prior to Cura, it was almost impossible for Kellogg to obtain an accurate count of the controls used for SOX compliance. The answer was hidden among hundreds of spreadsheets. Now,

information is available at the click of a button. (At the time of this writing, there were approximately 20,000 controls and 2,200 key controls.)

“We now have the ability to complete qualitative reviews,” said Dark. “We are looking forward to taking further advantage of Cura’s powerful reporting capabilities and have already used it to identify opportunities for efficiency.”

Cura has also helped Kellogg’s overcome the previous challenge of inconsistencies in documentation. Now there is one format, ensuring standardization. This was not the case in the past, despite a set of standard columns on spreadsheets.

Cura’s flexibility has been another benefit as it enabled the organization to simply implement its existing compliance program into the solution. “We also know that Cura will enable us to grow our program when we need to,” said Dark.

Feedback from users around the world has been positive. Dark said that customer service and support from Cura Software has been excellent. “If I could take them and make them a part of our internal IT team, I would,” she said. “They are highly responsive and very accessible.”

“Customer service and support from the Cura Software team is excellent. They are highly responsive and very accessible. If I could take them and make them a part of my IT team, I would.” - Nancy Dark, Corporate Accounting: SOX Compliance

About Cura Software

Cura provides smarter software solutions designed to enable businesses around the world to quickly achieve the bottom line benefits of governance, enterprise wide risk management and compliance (GRC), coupled with performance management. Cura does this through fast implementation, easier configurability and true enterprise architecture.

Established in 2001, Cura is used by over 200 customers such as Thiess, Anglo American plc, Westfield, Allianz, V/Line, Old Mutual plc, GlaxoSmithKline, Standard Bank, Virgin Blue, as well as governments and consulting firms world-wide. Cura has offices in Boston, London, Sydney, Melbourne, Hyderabad, Singapore, Cape Town and Johannesburg, and has distributors in 10 countries.

Cura is a wholly owned subsidiary of SoftPro Systems, traded on the Indian NSE and BSE Stock Exchanges. Learn more at www.curasoftware.com.