

Implementing an Anti-Corruption Program

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Developing and implementing an effective anti-corruption program can be a complicated process for companies that have offices in multiple locations, hundreds of employees and even greater numbers of business partners. Yet while anti-corruption programs differ across companies and industries, there is a logical way to implement an anti-corruption program to ensure that it is embedded into regular business processes.

Assess Your Risks

To begin building your anti-corruption program, you should start by assessing your risks. These risks will be unique based on your industry, geography, business structure and business relationships, so a comprehensive assessment will take all of these factors into consideration.

You will also want to consider the specific requirements of all anti-corruption laws that may apply to your business. Once you have determined the likelihood and impact of potential risks, examine the processes your company already has in place to manage them. This will help you identify gaps in your current controls and decide where your time and compliance dollars should be designated.

Put Together a Cross-Functional Team Led by a Senior Manager

It is also important to assign responsibility for the anti-corruption program to a senior person or group of persons in your company. Make sure that the person or persons you choose are equipped with the authority, resources and independence to develop, implement and improve your anti-corruption program. Concentrating responsibility at the senior level will help you get the message across that your company takes anti-corruption seriously.

Draft and Implement Policies, Procedures and Controls

Next, write your policies and corresponding procedures and financial controls. Make sure that your policies apply to all levels of your organization and to business partners with whom you work, as appropriate. Some companies draft separate supplier or vendor codes for this purpose.

Obtain approvals from your senior management (and your board of directors, if you have one), then communicate your policies throughout your organization and supply chain, driving your program forward and ensuring that it is acknowledged and followed.

Train Employees and Third Parties

Once your anti-corruption program has been developed and approved, you can begin to implement your program. Train all your employees, and business partners, as appropriate, in a regular, systematic manner to raise awareness to ensure that they understand how to follow your rules. You should provide specialized training to employees who work in high-risk markets or business units, as well as to the employees with responsibility for implementing your anti-corruption program. You should also carefully track and assess the results of your training to confirm that it is effective.

Monitor and Assess the Program, Take Corrective Actions

Due to the dynamic nature of risk, it is important for the success of your compliance program that it is regularly monitored and audited. You should regularly and carefully examine your program for effectiveness, looking at everything from expenses to protocol.

As you identify gaps, take timely, appropriate corrective actions and fill those gaps as necessary. Be sure that the results of your monitoring efforts are reported to senior management, and that your program is continually being improved.

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The Center for Responsible Enterprise And Trade (CREATe.org) is a non-governmental organization (NGO) helping companies around the globe prevent piracy, counterfeiting, trade secret theft, and corruption.

CREATe.org offers a practical, cost-effective three-step service – CREATe Leading Practices for Anti-Corruption. It covers applicable anti-corruption laws and international guidelines and helps companies assess and improve internal business processes – or that of supply chain and business partners – for preventing and detecting corruption.

For more CREATe resources on anti-corruption best practices, visit www.CREATe.org.