

## Top 10 Tips for an Effective Anti-Corruption Compliance Program

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Companies looking to improve their anti-corruption compliance programs can benefit from CREATE.org's "Top 10 Tips" for ensuring effective compliance. Providing advice for the development, implementation and enforcement of anti-corruption compliance programs, these tips are designed to promote compliance both within an organization and among its business partners.

### 1. Understand Your Risks

Perform regular risk assessments specific to your industry, geography, business structure, business partners and level of government oversight. Then evaluate those risks in the context of the company's control environment to ensure that gaps in the company's anti-corruption compliance program do not exist – and are filled if they do.

### 2. Implement Effective Policies and Procedures

Adopt, document and implement clear policies and procedures and effective financial controls, tailored to your risks.

### 3. Tone at the Top

Ensure that senior management is creating and sustaining a zero tolerance culture. Internationally recognized guidelines, such as the DOJ and SEC FCPA [Resource Guide to the U.S. Foreign Corrupt Practices Act](#) and the OECD [Good Practice Guidance on Internal Controls, Ethics and Compliance](#), underscore that commitment of senior management is vital to the effectiveness of a company's controls, and how the company will be viewed by enforcement authorities.

### 4. Tone in the Middle

Fully integrate middle management into your compliance efforts and hold them accountable for implementation. It is at this level of corporate management that the most compliance risks arise.

### 5. Ensure the Compliance Function has Independent Authority

Assign responsibility for anti-corruption compliance to senior level representatives who have independence, authority, and adequate resources. Cross-functional teams are a best practice.

### 6. Do Your Due Diligence

Rigorously vet your business partners before entering into a formal relationship with them. A reported sixty percent of recent FCPA enforcement actions have involved third parties.

- 7. Document Business Partner Relationships Carefully**  
Spell out the services to be performed and payment terms for partnerships. At a minimum, provisions should be included for compliance reps and warranties and the right to terminate in the event of a corruption event.
- 8. Train and Communicate**  
Regularly train all your employees and provide specialized training for employees in high risk markets or business units. Require that high-risk business partners receive training as well. In addition to training, consistently communicate – both internally and externally – the importance of compliance.
- 9. Monitor Your Program and Partners**  
Regularly monitor your program and the performance of your employees and business partners.
- 10. Enforce and Improve**  
Perform thorough, timely investigations when problems arise and ensure that sanctions for specific violations are timely and appropriate. At a program level, take corrective action to fill gaps so that problems do not recur, and to update and improve the program as necessary.

For more information on improving your anti-corruption program, consult *CREATE Leading Practices for Anti-Corruption* at [www.CREATE.org](http://www.CREATE.org)