

# Anti-Bribery and Corruption Risk Assessment Checklist

By NAVEX Global's Advisory Services Team

With the introduction of the Foreign Corrupt Practices Act (FCPA) and UK Bribery Act, organizations must take corruption in business seriously. Given the complexity of the activities addressed in an anti-bribery and corruption program, however, the task can seem overwhelming.

Our Anti-Bribery and Corruption Risk Assessment Checklist outlines how to implement an effective anti-bribery compliance program using a protect, detect and correct methodology to manage core program components such as:

- Policies
- Risk Assessment
- Corrective Action
- Training / Communication
- Culture
- Controls / Oversight
- Business Partners

Our checklist will enable you to design and implement an effective, global and consistent anti-bribery compliance program.



## Checklist for a Comprehensive Anti-Bribery Program

*Program Elements*

PROTECT	DETECT	CORRECT
<p><b>POLICIES</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Identify anti-bribery, conflicts of interest, gifts &amp; entertainment, travel, charitable giving, political contributions, offset agreement and other related policies in use across your organization</li> <li><input type="checkbox"/> Identify key stakeholders for policies in all geographic areas</li> <li><input type="checkbox"/> Draft/update global anti-bribery policy</li> <li><input type="checkbox"/> Incorporate anti-bribery policy conflicts of interest, gifts &amp; entertainment, travel, charitable giving, political contributions and offset agreement policies and guidance</li> <li><input type="checkbox"/> Vet new policies and guidance with key contacts in each geographic area</li> <li><input type="checkbox"/> Update code of conduct to include appropriate anti-bribery and other policy updates</li> <li><input type="checkbox"/> Develop plan and timeline for implementing new policies across organization</li> <li><input type="checkbox"/> Roll out anti-bribery policy to appropriate employees and require certification</li> <li><input type="checkbox"/> Roll out revised code of conduct to all employees and require certification</li> <li><input type="checkbox"/> Put in place regular review process for policies</li> </ul>	<p><b>RISK ASSESSMENT</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Conduct/update risk assessment</li> <li><input type="checkbox"/> List all geographic locations in which you operate and rank areas by risk based on: <ul style="list-style-type: none"> <li><input type="checkbox"/> Corruption risk level (using CPI or other risk ranking system)</li> <li><input type="checkbox"/> Type and amount of business you do in each area</li> <li><input type="checkbox"/> New areas or areas of planned expansion.</li> <li><input type="checkbox"/> Extensive use of third parties</li> <li><input type="checkbox"/> Dealings with government officials</li> </ul> </li> <li><input type="checkbox"/> Prioritize all future activities by risk ranking</li> <li><input type="checkbox"/> Audit financial records for third party payments, gifts, travel, charitable and political contributions</li> <li><input type="checkbox"/> Note issues and develop plan to investigate and address issues found</li> <li><input type="checkbox"/> Identify interactions with government officials (including SOEs), including what, when, who, etc.</li> <li><input type="checkbox"/> Identify processes for managing payments to government officials and others</li> <li><input type="checkbox"/> Identify any existing oversight practices</li> <li><input type="checkbox"/> Periodically reassess risk and modify the program</li> <li><input type="checkbox"/> Survey executives and key personnel in each geographic area regarding past and current corruption risks and risk mitigation practices</li> </ul>	<p><b>CORRECTIVE ACTION</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Execute on plan to mitigate issues found via risk assessment</li> <li><input type="checkbox"/> Develop/revise processes and controls for: <ul style="list-style-type: none"> <li><input type="checkbox"/> Gifts, entertainment and travel</li> <li><input type="checkbox"/> Customs and cross-border shipping</li> <li><input type="checkbox"/> Charitable giving</li> <li><input type="checkbox"/> Political contributions</li> <li><input type="checkbox"/> Potential conflicts of interest</li> </ul> </li> <li><input type="checkbox"/> Vet processes with key stakeholders in each geographic area</li> <li><input type="checkbox"/> Identify system/procedures for managing processes</li> <li><input type="checkbox"/> Acquire incident/investigation management system and/or adjust processes to ensure proper oversight</li> <li><input type="checkbox"/> Develop reports and process for providing regular updates on program to senior management and board</li> <li><input type="checkbox"/> Brief leadership on new processes and obtain support</li> <li><input type="checkbox"/> Establish regular review schedule of program status with leadership</li> <li><input type="checkbox"/> Implement anti-corruption financial controls (gifts, conflicts, travel, etc.)</li> <li><input type="checkbox"/> Implement revised incident/investigation system and processes</li> <li><input type="checkbox"/> Review and obtain feedback on processes and make appropriate modifications</li> <li><input type="checkbox"/> Conduct regular audits of procedures and controls</li> </ul>

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<p><b>TRAINING / COMMUNICATION</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Acquire/develop anti-bribery training for employees (online and offline)</li> <li><input type="checkbox"/> Identify target audience</li> <li><input type="checkbox"/> Develop rollout plan, messaging, consequences for non-compliance, etc.</li> <li><input type="checkbox"/> Communicate with business leaders regarding new policies and their significance</li> <li><input type="checkbox"/> Develop overall anti-bribery and speak up communication plan (emails, web site, newsletters, posters, etc.)</li> <li><input type="checkbox"/> Roll out anti-bribery training to employees</li> <li><input type="checkbox"/> Deliver periodic training and communications regarding anti-bribery and reporting responsibilities (online, offline, mobile, etc.)</li> <li><input type="checkbox"/> Implement anti-bribery communication plan</li> <li><input type="checkbox"/> Communicate to employees when issues have required action</li> </ul>	<p><b>CULTURE</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure hotline is visible to all employees in appropriate languages</li> <li><input type="checkbox"/> Deliver communications to employees regarding hotline and anti-bribery policies</li> <li><input type="checkbox"/> Review past corruption incidents (hotline, investigations, etc.) and identify areas/issues that require immediate or additional attention</li> <li><input type="checkbox"/> Conduct employee surveys to evaluate culture and effectiveness of program</li> </ul>	<p><b>CONTROLS / OVERSIGHT</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Obtain leadership support for anti-corruption program</li> <li><input type="checkbox"/> Identify/review existing processes and controls for managing: <ul style="list-style-type: none"> <li><input type="checkbox"/> Gifts, entertainment and travel</li> <li><input type="checkbox"/> Customs and cross-border shipping</li> <li><input type="checkbox"/> Charitable giving</li> <li><input type="checkbox"/> Political contributions</li> <li><input type="checkbox"/> Conflicts of interest</li> </ul> </li> <li><input type="checkbox"/> Implement/update background investigation processes for executives and key personnel</li> <li><input type="checkbox"/> Create guidelines for enforcement of policies and establish disciplinary procedures to address issues</li> </ul>

PROTECT	DETECT	CORRECT
<b>BUSINESS PARTNERS</b>		
<ul style="list-style-type: none"> <li><input type="checkbox"/> Review standard agreements and revise to address required compliance with anti-bribery policies</li> <li><input type="checkbox"/> Develop/revise business partner code of conduct</li> <li><input type="checkbox"/> Require certification by business partner representatives on code of conduct</li> <li><input type="checkbox"/> Acquire/develop anti-bribery training for business partners</li> <li><input type="checkbox"/> Develop policy for business partner anti-bribery training (who must take training, exceptions if business partner has its own, etc.)</li> <li><input type="checkbox"/> Ensure business partners understand your anti-bribery policies and principles</li> <li><input type="checkbox"/> Deliver anti-bribery training or require proof of anti-bribery training to representatives from higher risk business partners</li> <li><input type="checkbox"/> Require business partner representatives to certify on anti-bribery policy and that all employees doing business on your behalf have been trained</li> <li><input type="checkbox"/> Deliver periodic communications to business partners regarding helpline and anti-bribery policies</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Develop global list of third parties utilized in each geographic area</li> <li><input type="checkbox"/> Review business partner agreements and identify red flags</li> <li><input type="checkbox"/> Develop risk ranking methodology for business partners, using elements like:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Geographic area</li> <li><input type="checkbox"/> Third party type/structure</li> <li><input type="checkbox"/> Services being acquired</li> <li><input type="checkbox"/> Spend level</li> <li><input type="checkbox"/> Contract/payment terms</li> <li><input type="checkbox"/> Length of relationship</li> </ul> </li> <li><input type="checkbox"/> Assign risk ranking to each business partner</li> <li><input type="checkbox"/> Prioritize business partner due diligence activities based on risk rankings</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Obtain support for revised business partner management processes from business leaders</li> <li><input type="checkbox"/> Review existing due diligence processes and controls for hiring and managing business partners</li> <li><input type="checkbox"/> Identify key stakeholders for new business partner processes               <ul style="list-style-type: none"> <li><input type="checkbox"/> Draft new business partner on-boarding processes based on risk</li> </ul> </li> <li><input type="checkbox"/> Draft new business partner monitoring processes based on risk</li> <li><input type="checkbox"/> Vet new business partner on-boarding processes with key business leaders</li> <li><input type="checkbox"/> Vet new business partner monitoring processes with key business leaders</li> <li><input type="checkbox"/> Identify system and/or procedures for hiring and managing business partners that provides proper oversight and visibility by compliance office</li> <li><input type="checkbox"/> Implement new business partner on-boarding and monitoring processes</li> <li><input type="checkbox"/> Review and audit processes and make appropriate modifications</li> </ul>

## Conclusion

Knowing which steps to take to ensure your organization remains vigilant against bribery and corruption is an important move. When your organization is aligned on anti-bribery and corruption policy, training and third party risk, your employees can identify, report—and ultimately stamp out—bribery and corruption.

Our Solutions Experts can help you strengthen your most challenging ABC issues and better protect your organization. Contact us to set up a consultation today at [info@navexglobal.com](mailto:info@navexglobal.com).

### ADDITIONAL RESOURCES

- Online Training: [Anti-Corruption Training for Vendors, Suppliers, and Third Party Due Diligence](#)
- White Paper: [A Holistic Approach to Anti-Corruption Compliance](#)
- Benchmarking Report: [2015 Ethics & Compliance Third Party Risk Management Benchmark Report](#)
- Blog Post: [Anti-Corruption Training for Vendors, Suppliers, and Third Party Due Diligence](#)

### RELATED NAVEX GLOBAL SOLUTIONS

- [RiskRate™ Enterprise Due Diligence](#)
- [NAVEXEngage™ Ethics and Compliance Training](#)
- [PolicyTech™ Policy and Procedure Management Software](#)

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