Introducing an anti-bribery & corruption compliance programme
Overview

- Where do you start
- A proven approach
- Observations from implementing global communications, awareness and training programme across 40 countries and 200K employees
- Compliance to competitive advantage
- What does a fraudster look like?
- Cressey revisited
- Identifying risks/exposures
- Putting in place controls
- Conclusion
Where do you start?
A proven approach

Communications
Awareness
Training
My observations No. 1

- Difficult balance
  - Meeting compliance requirements
  - Implementing a communications, awareness and training programme
  - Ensuring effectiveness of both
  - Getting a return on investment from both
My observations No.2

- Tone at the Top is essential
- Gaining operational granularity of business processes can only be done by the people doing the job
- External help can pinpoint and raise exposures and suggest controls
My observations No.3

- To make compliance and Communications Awareness and Training into a competitive advantage any content delivered to the user needs to be engaging and entertaining and high profile.

- People learn best when they are participating, having fun and the activity is going to add value to their personal brand.
My observations No 4

- Effectiveness does not have to be complicated

- A simple test to find out if any of the compliance / CAT activity has been effective is to ask anyone from the CEO to the shop floor:

  “Do you know where the bribery policy is and do you know how to report a suspected fraud/bribe?”
How to turn Compliance into Competitive Advantage

“If you don’t have a competitive advantage, don’t compete.”

JACK WELCH
legendary CEO
What does a fraudster look like?
How many do you recognise?
Cressey’s Fraud Triangle

What can you do to limit these factors?
Conclusion

- Importance of compliance will continue to increase, e.g.
  - Legislation – Bribery Act 2010
  - Regulation - UK Corporate Governance Code 2014
  - Risk management

- It is possible to turn compliance into a competitive advantage
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