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Are You Ready For ISO 37001?

The latest global anti-bribery standards redefine a framework for corporate compliance

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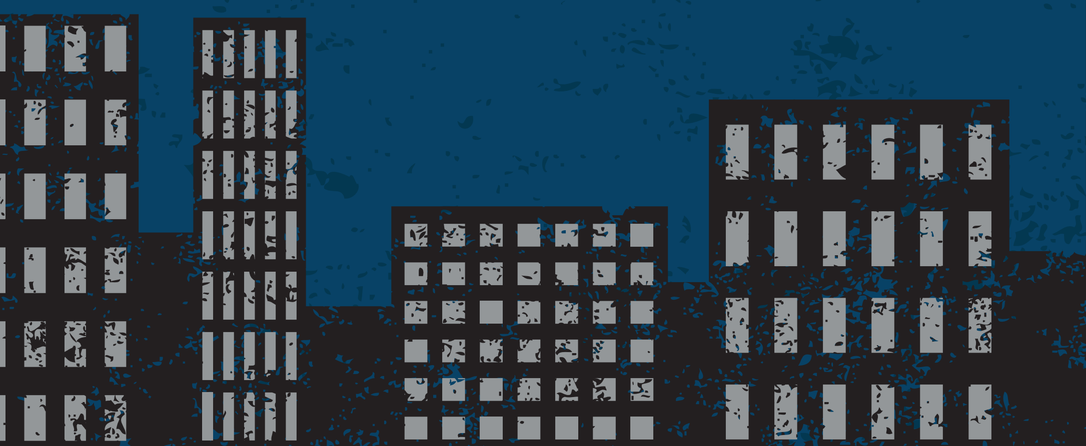

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A Message from the CEO

There are some critical questions being posed to business leaders today: Has your organization implemented reasonable and proportionate measures to prevent bribery? How will you know if your anti-bribery and anti-corruption controls are effective? Are you aware of the latest best practices in preventing bribery? In short, are you ready for ISO 37001?

The International Organization for Standardization (ISO) issued the ISO 37001:2016 Anti-Bribery Management System standard, which mirrors numerous steps contained in the U.S. Foreign Corrupt Practices Act (DOJ and SEC) and Good Practice Guidance on Internal Controls, Ethics and Compliance (OECD), Anti-Corruption Ethics and Compliance Handbook for Business (OECD), UK Bribery Act 2010 and the British Ministry of Justice's Adequate Procedures document.

Welcome to our e-book, where you'll learn the facts about how this new standard will integrate top-level leadership, training, bribery risk assessment, due diligence adequacy, financial and commercial controls, reporting, audit and investigation, all to keep your organization better protected from harm.

After reading this e-book, I invite you to contact CRI Group to learn more about how we can help you become ISO 37001 ready today.

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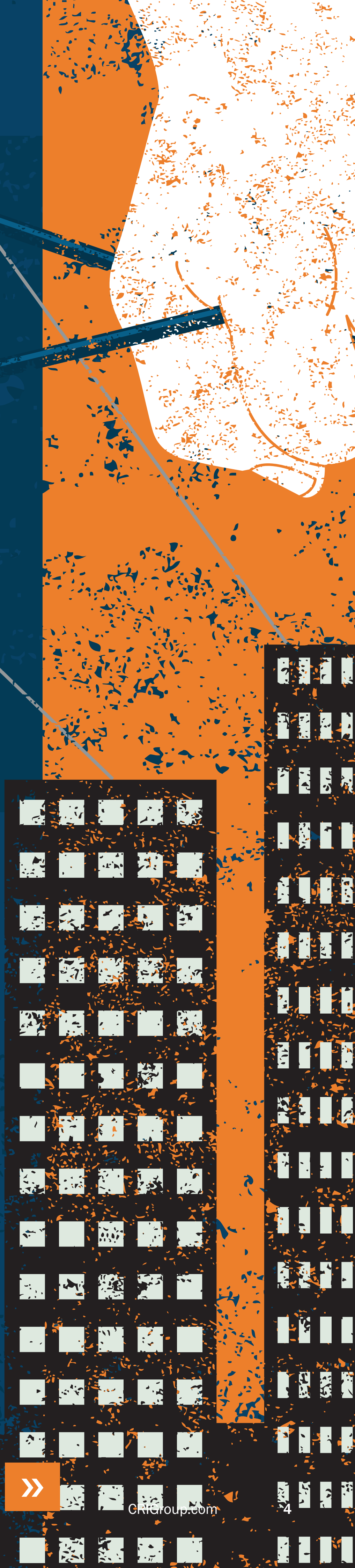
Are You Ready For ISO 37001?

The latest global anti-bribery standards redefine a framework for corporate compliance



The past decade has seen a dramatic rise in the prosecution of organizations accused in bribery schemes. Often regarded in many regions as a standard operating procedure necessary to move business along, the practice of bribery is fast becoming a focal point for governments and global watchdogs intent on levying heavy fines and penalties for companies involved in the practice.

Some notable cases in point:

- Wal-Mart is facing at least $600 million in fines for allegedly paying off officials in Mexico, India and China to fast-track zoning and building permits and sidestep licensing and environmental permits. The company has already racked up nearly $800 million in legal fees and revamped compliance systems during the five-year investigation, which has yet to be settled.
- Amsterdam-based VimpelCom Ltd. agreed this year to pay $795 million to settle U.S. and Dutch claims that it bribed officials in Uzbekistan to win business.

- Siemens AG paid a record $800 million in a combined SEC-U.S. Justice Department penalty in 2008.
- U.S. asset manager, Och-Ziff Capital Management LP, will pay $412 million in penalties and fines to settle a U.S. investigation into bribes that were paid across Africa.

Billions of dollars are being forfeited worldwide by companies unable to keep up with the varying maze of international regulations, laws and rules that stipulate the boundaries of bribery.

Fortunately, the International Organization for Standardization (ISO) has undertaken the complex task of creating a globalized standard of measurements designed to identify, prevent and respond to bribery. Adopted in late 2016, "ISO 37001" sets out to provide guidance on internationally recognized good anti-bribery practices. Written in easy-to-understand language, the standard can easily be applied to any public, private or not-for-profit organization, regardless of type, size or nature of business or activity.

That's good news for companies intent on conducting global business that fosters transparency, integrity, openness and compliance. Better yet, those organizations that can develop and implement reasonable and proportionate measures to prevent, detect and respond to bribery will stand a better chance defending against harmful prosecution in the event they become embroiled in an international bribery case.

And while many parts of the world regard bribery as a "normal cost of doing business," there is a growing trend to make organizations, as well as individuals, liable for acts of bribery.

The global definition of bribery

The book definition for bribery defines the act of "offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location(s), in violation of applicable law, as an inducement or reward for a person acting (or refraining from acting) in relation to the performance of that person's duties."

Put more simply in the context of international law, an offense occurs as a result of four key crimes:

1. Bribing
2. Receiving a bribe
3. Bribing a foreign public official
4. Failing to prevent bribery

International laws and regulations (including the FCPA and UK Bribery Act) make various forms of bribery a crime, punishable by unlimited fines, forfeiture of public contracts, and possible imprisonment of the organization's senior officials.

Those regulations define bribery, receiving a bribe, or failing to prevent a bribe in these terms:

- Bribery in the public, private and not-for-profit sectors
- Bribes made by the organization, its personnel, or outside business associates

- Bribes made to the organization, its personnel, or outside business associates
- All direct and indirect bribes, including those offered or accepted through or by a third party

And while many parts of the world regard bribery as a “normal cost of doing business,” there is a growing trend to make organizations, as well as individuals, liable for acts of bribery. Aside from the obvious arguments that regard bribery as a crime, there are long-lasting effects that the practice has on governments, economies and societies, most notably:

- Bribery erodes trust in governments and public officials
- Bribery interferes with normal competitive practices in the global marketplace
- Bribery diminishes the quality of products and services
- Bribery puts societies at risk and imperils citizens through potential shoddy workmanship and inferior infrastructure

Bribery committed by third-party affiliates

The world is starting to take notice of the disastrous effects of bribery and corporate corruption, and is going after businesses and officers within the corporation on a noticeably increasing scale.

And oftentimes those accused organizations surprisingly have to answer to charges that were, in fact, committed by outside third-party representatives of the business.

According to industry reports, more than 90% of reported FCPA cases have involved third-party intermediaries acting on behalf of organizations. This astounding fact confirms the need for corporations to develop and implement anti-bribery measures that ensure compliance with the myriad legal prohibitions on foreign bribery, clearly outlines steps to safeguard against this behavior on a multi-jurisdictional level, and provides protection for the organization from the costly litigation that can result from corrupt practices.

The need for ISO 37001

ISO 37001 sets the standard for such measures by specifying steps that an organization must implement to develop a management system which prevents, detects and responds to bribery while complying with anti-bribery laws within the organization’s operations and by outside affiliated business partners (such as agents, suppliers, distributors and other third-parties).

In summary, those best-practice measures include:

- Implementing an anti-bribery policy and program.
- Adequately communicating the policy and

According to industry reports, more than 90% of reported FCPA cases have involved third-party intermediaries acting on behalf of organizations.

program to all relevant personnel and business associates.

- Appointing a compliance manager to oversee the program.
- Providing appropriate anti-bribery training for personnel.
- Assessing bribery risks, including appropriate due diligence.
- Taking reasonable and proportionate steps to ensure that outside organizations and third-party business associates have implemented appropriate anti-bribery controls.
- Verifying that personnel will comply with the anti-bribery policy.
- Controlling non-monetary outflows, such as gifts, hospitality, donations and similar benefits to ensure that they do not have a corrupt purpose.
- Implementing appropriate financial, procurement and other commercial controls so as to help prevent the risk of bribery.
- Implementing effective whistle-blowing and other internal and external reporting procedures.
- Investigating and dealing appropriately with any actual or suspected bribery occurrence.

In a nutshell, ISO 37001 takes into account a compendium of international best practices, which enables global organizations to apply and implement uniform anti-bribery measures irrespective of the various countries in which they operate.

Becoming compliant: the benefits of ISO 37001 certification

Because ISO 37001 is built around a set of generally accepted requirements, global organizations can become certified in the standard, utilizing the services of an accredited third-party certifying body. Certification will add a distinct level of credibility to the organization's management systems and must be completed by a qualified, independent third-party specifically versed in ISO 37001:2016 certification.

Becoming certified in ISO 37001 enables the organization to demonstrate that it has adequate procedures in place to detect and prevent bribery on a multi-national level. Additionally, such certification:

- Ensures that the organization is implementing a viable anti-bribery management program utilizing widely accepted controls and systems.
- Provides assurance to management, investors, business associates, personnel and other stakeholders that the organization is actively pursuing internationally recognized and accepted processes to prevent bribery and corruption.
- Protects the organization, its assets, shareholders and directors from the effects of bribery.
- Provides acceptable evidence to prosecutors or courts that the organization has taken reasonable steps to prevent bribery and corruption.

Bribery continues to be a significant problem on a worldwide scale, and conforming to an internationally recognized standard to combat the practice while promoting ethics in business will help organizations succeed in the ever-expanding global marketplace. ›

> Certification will add a distinct level of credibility to the organization's management systems...

The Consequences of Inadequate Due Diligence

Don’t rely on just “desktop due diligence” for your risk management program

Operating a global business today requires efficiently managing a network of third-party partners that supply product components, run operations in foreign markets, operate call centers, or act as outside agents.

The vast array of capabilities and specialized skill sets of a well-maintained third-party network makes operations easier for both the organization and its customers. But many organizations, from small businesses to multi-national corporations, can rarely afford the time and effort required in-house to manage these often complex third-party relationships.

Because of this, the risk of unethical business practices, bribery and other business corruption potentially increases if inadequate due diligence is conducted on third-party partners. The ramifications of a scandal related to a third-party partner can easily take down an organization, resulting in such risks as a damaged reputation and brand devaluation, to regulatory violations, legal proceedings and possible fines and jail terms for directors. The only way to fully protect the corporation's assets, therefore, is through a strong and viable third-party risk management program.

Building a third-party risk management program is not a passive process. It requires time and effort on a continual basis, as the risks associated with third-party partnerships constantly evolve.

Consider the events of this past summer, during which the legislators of three separate nations signed new compliance regulations and standards into law. Without a doubt, if your organization's third-party risk management program is unable to quickly adjust to these new regulations (or is not designed to anticipate future legislative movements) your organization is truly at risk.

Cutting corners: not worth the risk

Still, far too many organizations are willing to tempt fate by cutting corners on development and implementation of their third-party risk management program. Certainly, building a strong risk management program requires a significant investment of time and resources (both internally and from the outside), but the consequences of not doing it right could be dramatically severe.

One way organizations attempt to cut corners is by relying on outdated or stagnant tools to monitor, detect and prevent risks. Almost always, hiring outside industry professionals with proven track records of successful due diligence experience is necessary.

Relying too heavily on "desktop" due diligence is another dangerous shortcut. Desktop due diligence is an important initial step of the investigative process, involving background checks, lien searches, regulatory filing investigations and environmental reports. And while it is a vital component of any effective due diligence program, it's not nearly enough to thoroughly evaluate a third-party.

Truly understanding a potential partner's business requires a considerable amount of time spent face-to-face with the outside organization's leadership, operations management and even current customers. This "boots on the ground" process will detect potential risks which are often hidden from a distance, and undetectable via web-based discovery tools.

The "boots on the ground" approach also helps to establish a relational dynamic required for ongoing negotiations and provides clear insight into two of the fastest-growing issues in third-party risk management: bribery and labor management.

Bribery as a compliance issue

Anti-bribery and anti-corruption compliance is a fast-moving target. New anti-bribery laws and regulations are being decreed around the world at a relentless pace. Complicating matters further, many countries may have laws in place but lack the ability to adequately enforce them. When this is the case, the responsibility falls to your organization's due diligence program to ensure detection and protection.

High profile investigations in recent years have contributed to the rapid emergence of bribery and corruption as a societal issue. Never before has such a contrast been drawn so dramatically on a global stage between those that engage in bribery and those that suffer as a result. Any organization that finds itself mixed up in a scandal involving bribery has more than a legal mess to contend with. It has a long battle to win back the trust of its shareholders, employees, customers and the public.

Conducting sufficient due diligence surrounded by such varying factors is work that must be conducted in person. Gaining insight into a potential partner's company culture requires a level of immersion with the organization's leadership, management and staff. When it comes to evaluating bribery risk, some warning signs can only be discovered on-site.

Labor matters and compliance

From overtime issues and under-age workers, to unsafe working conditions and improperly documented accidents, labor compliance represents a major component of any strong third-party risk management program.

Once again, inadequate attention to risks related to labor compliance can bring on considerable penalties. Understanding which industries, geographic regions and management structures elevate the organization's risk is key to efficiently operating an effective due diligence program. This understanding is nearly impossible to guarantee via 'desktop' due diligence. Spending the necessary time in person is the only way to be sure a potential supplier is properly compensating and managing employees while providing a safe workplace environment.

Make no mistake, even if your agreement with a third-party partner places the responsibility of payroll issues firmly upon the vendor, your organization — as a joint employer — can still be held accountable in many countries. After all, the labor being conducted at your partner's facility benefits your organization's bottom line.

Best practices

The demands of identifying and measuring third-party risk, monitoring those potential risks on an ongoing basis, and making recommendations based on empirical research is best met by a dedicated team of outside professionals. And while no two organizations are alike in terms of risk profiles, several factors have become consistent in building a strong and effective due diligence program:

- **Planning.** Without a well thought out plan outlining ongoing monitoring efforts with assigned roles and responsibilities, efforts to mitigate risk will be haphazard at best, and dormant at worst. With a thoroughly established, management-advocated program that identifies specific risk factors for each affiliation, a process for addressing red flags, and an established mechanism for continual revision, the organization will remain vigilant in its efforts to protect itself from liability.
- **Documentation.** Due diligence efforts are only as good as the information and data gathered and secured. Meticulous documentation and reporting enables the organization to recognize trends, communicate analyses, and sustain efforts during any future personnel changes. Effective risk management programs feature established guidelines for capturing data, contracts and research with uniformity.
- **Culture.** An organization where leadership, management and workforce do not take third-party risk seriously will never be adequately protected from risk. Successful organizations in this respect dedicate themselves to building a culture in which every employee feels personally invested in the risk management of the operation. Employees must feel empowered and encouraged to report red flags. Passive engagement is simply not enough.

Done correctly, third-party risk management can effectively save the organization from risk, liability and other perils often associated with outside entities wanting to engage and transact with your business. ›

THE WORLD IS WATCHING
Corporate Ethics and Transparency

Business ethics is a commitment. It is an action. Before an organization can consider its governance a strength, it needs clearly defined values that guide decision making and behavior at every level. It needs a mechanism in place to measure ethical performance. It needs a plan for continually identifying, investigating and managing risk.

The strongest organizations hold their guiding values so closely that they are known not only by leadership and employees, but also by shareholders and customers.

Companies thrive on healthy relationships with shareholders, customers, and employees. Unethical practices destroy relationships. A lack of solid, well-planned corporate governance is a vulnerability that inevitably becomes public. Constant court battles, penalties, bad publicity and embarrassing scandals are not just major red flags for consumers looking for secure investments. They discourage customers, drive out talented employees, and with top-tier talent eager to work for companies dedicated to transparency and ethical operations, they make recruitment an impossible task.

Still, it seems that every day brings news of bribery scandals, corporate leaks, human trafficking investigations and corruption of all sorts. The constant stream of stories involving organizations behaving badly has fed public cynicism and distrust — sentiments that recent trends suggest have reached a tipping point. Simply put, people have had enough of corruption and unethical behavior. Demand for transparency and accountability is strong.

In one sense, this is not a revelation. Corruption in business and government has always been despised. But for years, corruption in some industries has been perceived as unavoidable and too costly to eliminate. Essentially, participants have chosen to pass unethical practices off as 'the cost of doing business' or 'business as usual' to justify looking the other way.

But in another sense, it's worth considering that as consumer expectations of service has changed, so have expectations of corporate responsibility. Just as any organization cannot afford to ignore changing economic conditions, organizations cannot ignore changing social conditions. Recent global trends in popular demonstrations, media scrutiny, government action and judicial focus have shown that passive acceptance of corruption as an unfortunate but necessary evil is rapidly disappearing.

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A time for transparency

For many countries, the road from adopting anti-corruption regulations to actively enforcing them has been long. But without question the pace has quickened dramatically in recent years.

We can all agree that this is a development worth celebrating. As cultures around the world commit to demanding a higher standard of transparency, integrity, and responsibility from businesses and governments, we move closer to an undeniably better, safer environment for everyone. We move toward more stable economic, political, and regulatory environments.

Societies connect in new ways every day. Information today is shared at lightning speed and judgments are made just as quickly. So, when damaging news or allegations regarding a company is leaked, it is instantly shared around the world and a storyline is developed. A reputation for integrity and transparency is the best defense. But it can only be earned. In a world where secrets no longer stay secrets for long, transparency is crucial.

Now, more than ever, organizations must be relentlessly focused on managing third party risks with a heightened value on transparency. One incident in an inadequately managed and monitored supply chain can have destructive consequences that could tie an organization up legally and financially for years.

Third-party risk management

At CRI Group, we tell our clients that when it comes to third party anti-corruption management, a strong initial risk assessment is key. Knowing what risks third party vendors present drives a broader strategy based on constant assessment, analysis, training and monitoring.

This is not a simple task, as companies evolve over time. A vendor that represents a low risk one year may become a major vulnerability the next, becoming an unknown threat. Similarly, a vendor considered high risk one year may drastically improve its risk profile the next and no longer demand the time and effort necessary for heightened scrutiny. With a strong program in place to continually monitor and evaluate vendor relationships, organizations can be assured that resources are being properly appropriated to reduce risk.

A recent bribery scandal involving Alcoa Inc., the largest U.S. manufacturer of aluminum, resulted in a penalty of $384 million. The charges stated that a closely held subsidiary of Alcoa bribed officials of a Bahraini state-controlled aluminum smelter. This incident, and its resulting consequences, could have been prevented had a comprehensive program been in place to detect and prevent unethical action. The Securities and Exchange Commission released a statement that read, in part: "It is critical that companies assess their supply chains and determine that their business relationships have legitimate purposes."

While the trend toward cracking down on corruption is worldwide, regulations vary greatly from country to country, and from industry to industry. Recent years have seen major changes to, or introductions of, far-reaching legislation, including the UK Bribery act, the Modern Slavery Act, and the FCPA that call for careful consideration. This makes compliance challenging for companies with broad supply chains.

A comprehensive third party risk management program, administered responsibly, is the only way to ensure governance standards are upheld throughout an organization's supply chain. Automated due diligence processes based on public records, with the promise of low cost efficiency, is alluring. But relying on public records for identifying vulnerabilities across multinational vendor relationships is a half-measure. Certainly, public records-based compliance will always be a basic component of a risk management program, but person-to-person interaction is invariably the best path to meaningful insight into a third party's reputation, practices and ethics.

Ethical companies are strong companies

The benefits of a company's strong commitment to ethics and social responsibility go beyond the immediate gratification of simply doing the right thing. Certainly, a commitment to profitability is a central tenet of any successful business. But the cost of pursuing profit blindly — without giving concern to the means of pursuit — must be reckoned with.

A reputation for ethical behavior is a crucial component for any organization's long-term success. Securing such a reputation requires a constant, deliberate effort toward building, maintaining, and protecting values that guide decisions throughout the organization. It also requires a diligent effort to remain capable of adapting to an ever-changing environment.

Though the benefits of a strong commitment to social responsibility are great, building and maintaining high ethical standards is not easy. Even for companies with long-standing result-driven compliance programs, performance according to these standards can fluctuate. Ethisphere and similar corporate ethics institutions reflect this reality in annual indexes and rankings.

A strong culture of social responsibility adds value to every interaction. When principles guiding ethical behavior become part of a company's culture, the risk of focus shifting away from responsibility disappears. Principles handed down from the top become reminders — they become 'how' a company operates. We should hold ourselves to a higher standard. The principles guiding an organization, when truly part of the culture and embraced at an individual level, become 'why' a company operates.

A matter of leadership

An organization's ethical performance rises and falls with leadership. To truly instill an ethical culture, the leaders of the organization must define guiding principles and values, clearly communicate them, and, most importantly, live them. Leadership must serve as daily examples of executing goals with integrity.

Employees will not embrace a proactive culture of responsibility without trusting that the organization's leadership is uncompromising in its dedication to doing the right thing every time, regardless the cost. Hotlines and surveys are common tools organizations use to gauge performance in these areas. At many companies, they are the only tools. We know well the flaws associated with relying only on the results gained from them. Ironically, the tendency for skewed results can largely be traced back to leadership. How likely would it be for an an employee to report unethical behavior if leadership had not demonstrated a willingness to take it seriously?

Leaders should encourage and participate in constant dialogue around their organization's ethics. Annual retreats and frequent webinars simply are not enough. Meaningful discussions about transparency and ethics belong in every level and in every facet of an operation. The commitment to social responsibility should be embraced as one that must evolve and grow with its surrounding culture.

When a company's leadership publicly and internally puts their dedication to ethical practices at the forefront of the organization's priorities, it sends a powerful message to employees and customers. For some companies a commitment to guiding principles becomes a valuable component of their brand's identity.

The world is watching

Corruption is an ongoing storyline. It is now a narrative with which the public is constantly engaged. From Alcoa and Petrobras to the Panama Papers and FIFA, allegations catch fire quick and judgment from the court of public opinion is handed down just as fast.

These conditions lead to one unavoidable truth: It is time for all companies to step up the commitment to transparency and ethical practices. The due diligence requirements mandated by regulators must be considered a baseline. Companies must be vigilant in implementing strong anti-corruption programs that extend to vendors. The world is watching, and expectations have never been higher. ›

ISO 37001 Certification: Is it Worth the Effort?

Multinational organizations are realizing the many benefits of a certified anti-bribery management system

With an estimated $2 trillion in corporate dollars doled out annually to officials in the public and private sectors, the practice of bribery in the business world has approached near rampant proportions. But the world is taking notice and responding in kind. The enactment of the Foreign Corrupt Practices Act (U.S.) and the UK Bribery Act, among others, demonstrates that international governments, trade organizations, banks and non-government organizations alike are confronting such corporate corruption through laws and regulations that make various forms of bribery a crime, punishable by unlimited fines, forfeiture of public contracts,

and possible imprisonment of the organization's senior officials.

But for multinational organizations, compliance with these and a host of other international, regional and local anti-bribery regulations is a major task within itself. As such, organizations have relied on their anti-bribery management systems as the frontline defense in the battle to combat bribery both internally and externally. And naturally, no two management systems are alike.

With the adoption of ISO 37001 in late 2016, global organizations now have a uniform standard of requirements pertaining to their anti-bribery management systems. These approved standards are designed to help organizations better comply with international anti-bribery regulations.

According to the scores of experts who participated in drafting the standard, the purpose of developing ISO 37001 was to establish, implement, maintain and enhance an organization's anti-bribery program while preventing, detecting and addressing the many bribery risks throughout the entity's operations.

Conforming to ISO 37001 symbolizes an implied commitment by an organization to protect itself, its shareholders, its customers and its business partners from the hazards and risks related to bribery. But is the process of undergoing formal certification to the standard worth it? What is it about the standard that would motivate organizations to become certified?

As experts in the field of global risk management, we are of the opinion that the standard can greatly benefit any entity that conducts multinational business, no matter the size of the organization.

First, it should be noted that ISO 37001 specifies a series of measures to help organizations prevent, detect and address bribery. According to ISO, these measures include adopting an anti-bribery policy, involving top management and leadership, appointing a person to oversee anti-bribery compliance, developing an internal and external communications process for the program, providing training to personnel, undertaking bribery risk assessments and due diligence on projects and business associates, implementing financial and commercial controls, and reporting and investigation procedures.

The mere act of developing such a comprehensive anti-bribery management system, which is modeled after ISO 37001 should be reason enough for organizations to adopt the standard. It implies that the organization is taking the necessary steps to safeguard itself from the many inherent risks associated with this level of corporate corruption.

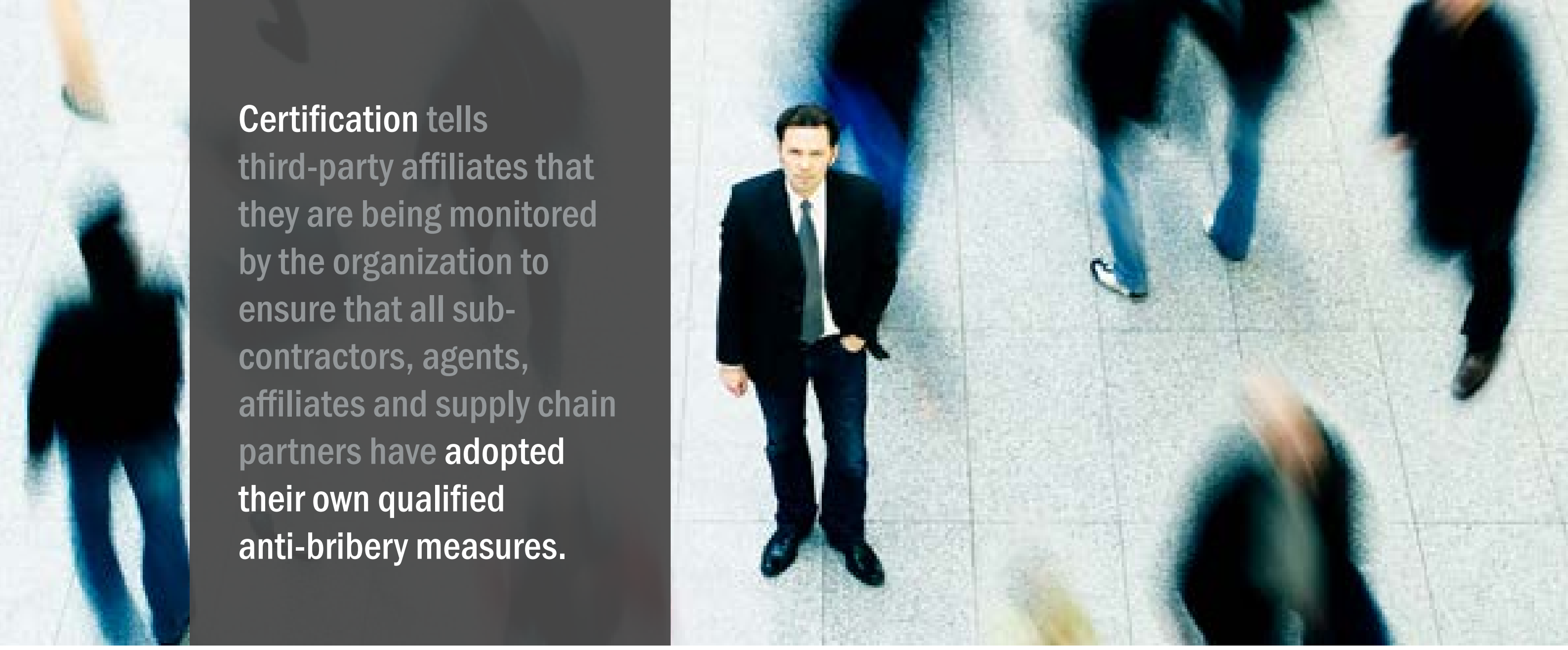
But if that reason is not enough to convince one to become certified, here are several other benefits that organizations will realize by adopting the standard:

1. **It demonstrates best practice in business.** Compliance with the standard shows a strong commitment on the organization's part that is working fervently to battle corruption, both internally and throughout its global supply chain. This gives the organization a competitive advantage, which can be very beneficial when competing for international contracts, jobs and bids.

   Further, certification will help position the organization as a premium provider, which could justify subsequent higher pricing on goods and services.

2. **It shows transparency in operations.** Through the certification process, the organization willingly opens itself up to the scrutiny of a qualified outside party. This transparency can greatly enhance the effectiveness of the organization's anti-bribery management system, as the auditor can bring ideas and input to the table that can help the organization improve on and enhance its systems and processes.

3. **It saves the organization money.** A strong anti-bribery and anti-corruption policy will



Certification tells third-party affiliates that they are being monitored by the organization to ensure that all sub-contractors, agents, affiliates and supply chain partners have **adopted their own qualified anti-bribery measures.**

save the organization money through its refusal to pay bribes and not having to execute costly procedures to facilitate a bribe.

Additionally, certification will save the organization's employees time and energy by eliminating the need to respond to potential customer inquiries into elongated steps required to establish proof of a qualified anti-bribery and corruption training program.

4 **It protects and preserves the integrity of the organization.** Adherence to the standard demonstrates that the organization is responding to (and supporting) a growing international call to incorporate ethics as a core value when conducting business around the world.

5 **It leads to healthier relationships with third parties.** Certification tells third-party affiliates that they are being monitored by the organization to ensure that all sub-contractors, agents, affiliates and supply chain partners have adopted their own qualified anti-bribery measures.

6 **It can greatly assist in legal cases.** Certification provides a verified level of proof in legal proceedings that the organization has demonstrated its commitment to anti-bribery practices by taking reasonable actions to prevent such corruption. This could have positive effects in many jurisdictions (though it will not establish a defense to prosecution for bribery in U.S. courts) and could help the organization avoid costly litigation, lawsuits and subsequent losses.

7 **It builds trust than can enhance the organization's reputation.** Certification provides a level of assurance to management, staff, stakeholders, and business partners that the organization is developing widely accepted systems and processes to detect and prevent bribery and corruption, and by doing so can show confidence that it is actively minimizing the risks, liabilities and reputational damage associated with this level of corporate corruption.

It's been well documented that the consequences of bribery around the globe are catastrophic, reducing quality of life, increasing poverty and eroding public trust. A certified anti-bribery program can't completely guarantee the elimination of corruption within the organization, but it will demonstrate and ensure that appropriate measures have been put in place to aggressively detect and prevent bribery within the organization. ›

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