

# B. Developing Anti-Corruption Programme

UNITED  
AGAINST  
CORRUPTION





“THERE ARE STILL THOSE OF US  
WHO WORK TO **OVERCOME**  
**CORRUPTION** AND BELIEVE IT  
TO BE POSSIBLE.

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Padmé Amidala

Photo: Lucasfilm Limited.

# Anti-corruption Programme

- Detailed **policies** and **procedures** put commitment into action
- Underlying **characteristics** enable programme to be **effective, efficient** and **sustainable**

# Characteristics of Anti-corruption Programme

- **Consistency with all applicable laws**
  - *Conduct **comprehensive research** on laws and regulations*
  - *Assign **legal experts** to review design of programme with respect to **consistency** with national and international laws*
  - ***Special attention** given to **extraterritorial requirements** of national laws*

# Characteristics of Anti-corruption Programme

- **Adaption to specific requirements**
  - *Adapted to **individual nature** of company*
  - *Outcomes of company's **risk assessment** determine extent of risks and specific areas anti-corruption measures **target***

# Characteristics of Anti-corruption Programme

- **Organizational culture, preferences or customs**
  - *Preferences of employees indicate best way to deliver trainings (e.g. computer-based trainings for technology companies)*

# Characteristics of Anti-corruption Programme

- Participation of stakeholders
  - *Participatory approach* in implementation and ongoing improvement of programme create **sense of ownership** among stakeholders
  - Support **recognition** and **acceptance** of anti-corruption programme



# Characteristics of Anti-corruption Programme

- **Participatory approach** pursued by:
- **Interactive processes:**
- *Providing information and requesting feedback, enabling informal discussions, or formal consultation with employees*



# Characteristics of Anti-corruption Programme

- Involvement of all relevant stakeholders:
- *Inviting trade unions, auditors, investors or business partners to comment*

# Characteristics of Anti-corruption Programme

- **Participatory approaches** establish **trust** and **understanding** among individuals affected
- Reduce **objections** or **resistance**
- Increasing **understanding** for need of strong system of **internal controls** to safeguard company's assets prevent **obstacles** from arising in **implementation**

# Characteristics of Anti-corruption Programme

- **Shared responsibility**
  - ***Compliance** with anti-corruption programme mandatory*
  - *Apply to all **levels, functions** and **areas** of company*
  - *Avoid impression of **double standards** and **flexibility** in interpretation of policies and procedures*

# Characteristics of Anti-corruption Programme

- *Rules and principles same for directors, top managers and front line employees*
- *Consistency in application of programme reflected in **human resources policies***

# Characteristics of Anti-corruption Programme

- **Accessibility:**
  - *Information on anti-corruption programme and supporting material*
  - *Publishing information on **company's website** and in **newsletters, publications** and other **communication vehicles***

# Characteristics of Anti-corruption Programme

- *Accessible information enable promotion of programme among employees and business partners*
- *Support and advice **helpdesk** offered to address questions and concerns*
- *Increase **understanding** of company's programme*

# Characteristics of Anti-corruption Programme

- **Readability:**

- *Easy to understand*
- *Avoid **acronyms** or **technical terms***
- ***Policies** and **supporting information** (e.g. training material)*
- *Providing **real-world examples**, **guidance** and **convenient tools***



# Characteristics of Anti-corruption Programme

- Promoting trust-based internal culture:
  - *Promote **culture** which favour trust over excessive control*
  - ***Trust-based culture** enable translation of anti-corruption policies into **values, norms and principles***

# Characteristics of Anti-corruption Programme

- *Create **favourable environment** for honest and ethical employees who seek advice in difficult situations and do not take decisions which may lead to **infringement** of anti-corruption policies*

# Characteristics of Anti-corruption Programme

- **Applicability**

- *Applicable to **company's employees** but also to relevant business partners and external stakeholders*
- *Involvement of **external parties** in communication strategies, trainings and other measures*

# Characteristics of Anti-corruption Programme

- **Continuity:**
- *Establishing anti-corruption programme not **one-time project***
- ***Ongoing process***
- ***Continuously adapted** to changing business environments and internal learning*

# Characteristics of Anti-corruption Programme

- **Efficiency:**
  - *Use company's resources **adequately***
  - *Continuously **optimized***

# Challenges and opportunities for SMEs

- **Fewer hierarchical levels** and **close interactions** between senior management, employees and business partners allow SMEs to observe characteristics with **less effort** than large companies

# Public reporting on developing an anti-corruption programme

- Companies of **all sizes** publically report
- International **good practice standards** (*UN Global Compact Transparency International "Reporting Guidance on the 10th Principle Against Corruption"*) assist companies to report on development of programme counter **corruption**



# Public reporting on developing an anti-corruption programme

- Provide **public written statement** company committed to be in compliance with all **relevant laws**
- Describe **procedures** and **efforts**
- Report on **existence** and **elements** in anti-corruption programme

**“THERE IS NO COMPROMISE WHEN IT COMES TO  
CORRUPTION. YOU HAVE TO FIGHT IT.”**

**A. K. ANTONY**

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