



# Anti-Bribery & Corruption



**integrity**  
Ethics & Compliance Training

## *Topic 1 – What Are Bribery & Corruption?*

1. **Video:** Overview of what bribery and corruption are. Impact on society. Never acceptable. Everyone is responsible for conducting business in an ethical and honest manner.
2. **Scenario:** Taking a foreign government official for a lavish dinner as a show of appreciation.
3. **Key Learning:** Business dinners may be appropriate but must be within guidelines. Contact details for questions around offering hospitality.
4. **Scenario:** Invitation from a local government official to a fundraising dinner for a local charity.
5. **Key Learning:** It is your responsibility to know what type of situations you need to escalate, and who you need to escalate to.
6. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 2 – Consequences of Bribery & Corruption*

1. **Interactive Screen:** Economic and social effects of bribery & corruption and the fact they are crimes around the world. Consequences for companies and individuals found guilty. Our policies help protect us.
2. **Scenario:** Working with an overseas agent.
3. **Key Learning:** An intermediary cannot shield you or the company from acts of bribery or corruption.
4. **Scenario:** Vendor offer of an internship for a family member.
5. **Key Learning:** This could give the appearance of, and possibly result in, a corrupt situation.
6. **Scenario:** Low-cost gifts for clients, i.e., cheap ballpoint pens to T-shirts.
7. **Key Learning:** Value of the gift in giver's eyes is irrelevant – the value to the recipient is the important factor.
8. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 3 – High-Risk Activity*

1. **Interactive Screen:** Types of risk; location based or country specific, industry related, situational or activity based, and people or relationship based.
2. **Scenario:** Possible facilitation payment.
3. **Key Learning:** A facilitation payment can be considered a bribe. Always identify and assess the level of risk by considering the countries and people you are dealing with.
4. **Scenario:** Risk of bribery or corruption for a high-risk role within a high-risk industry for a company with well-structured policies, procedures, and systems to prevent bribery.
5. **Key Learning:** Always assess the level of risk by considering the industries and people you are working with.
6. **Scenario:** Risk of bribery or corruption for company that went through rigorous screening process to become an authorized supplier.
7. **Key Learning:** Due diligence is a continual task and not just a one-off exercise. You must be able to identify high-risk activity and understand when and how to escalate this type of issue.
8. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 4 – High-Risk Locations*

1. **Interactive Screen:** Some locations pose a greater risk than others. CPI, assessing risk, red flags, and mitigation.
2. **Scenario:** Conducting a corruption risk assessment.
3. **Key Learning:** CPI ranks countries by the perceived levels of corruption. If you work in a high-risk location, be aware of the heightened risks. Contact details for questions.
4. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 5 – Cash, Gifts, & Entertainment Risks*

1. **Interactive Screen:** What is considered a bribe? What counts as gifts or entertainment? What to do if you have any doubts.
2. **Scenario:** Identify the expenses that could be perceived as bribes.
3. **Key Learning:** There is no minimum value for an improper payment in any form to be considered a bribe. Any offer or promise of something of value is sufficient to be considered a bribe.
4. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 6 – Tactics to Prevent Bribery & Corruption*

1. **Video:** Overview of tactics to prevent bribery and corruption. YOU are the most important control against bribery and corruption. Awareness of risk, ability to spot red flags, and willingness to speak up.
2. **Interactive Screen:** Red-flag statements and actions to watch out for. Always speak up.
3. **Scenario:** How to respond to a request for a gift from a government official.
4. **Key Learning:** Giving a gift of a bottle of wine, even a cheap one, to a government official to speed up the permit approval process could be seen as a bribe.
5. **Scenario:** How to respond to a request for a cash payment from an official to expedite a customs process.
6. **Key Learning:** If a payment is going to an official's agency or department with some sort of agency form or application, it is likely to be a permissible payment; but if it is going in the pocket of the official, it is likely to be considered a bribe.
7. **Scenario:** How to mitigate risk in bribery situations.
8. **Key Learning:** Never comply with requests for extra funds for expedition of services. Making an agreement to comply with bribery requests still counts as a bribe, even though no bribe has been given.
9. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 7 – Books & Records*

1. **Interactive Screen:** Importance of accurate record keeping. National law and company policy set record keeping standards. Everything must be thoroughly documented. Dealing with government officials. Always keep proper records.
2. **Scenario:** Payments without receipts made by a third party on our behalf.
3. **Key Learning:** We can be liable for actions of third party. Unusual payment requests raise a red flag, and may indicate that the true nature of the transaction is being concealed.
4. **Scenario:** Handling a gift of dinner vouchers received as a goodwill gesture.
5. **Key Learning:** Check company policy around record keeping, and keep the right records in the right way.
6. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 8 – Politically Exposed Persons*

1. **Interactive Screen:** Who are PEPs? How to identify a PEP. Dealing with PEPs. Obtaining senior management approval to work with a PEP.
2. **Scenario:** Risk of dealing with someone who is a close relative of a PEP.
3. **Key Learning:** A family member of a senior executive holding a position in government potentially exposes our company to the risk or perception of corruption and should be reported.
4. **Scenario:** What action to take when you discover an agent you are dealing with is related to a PEP.
5. **Key Learning:** Identifying a PEP does not mean you cannot do business with them, but it does mean that additional investigation and ongoing vigilance is required.
6. **Assessment:** Five-question quiz on the content presented in this topic.

## *Topic 9 – Speaking Up*

1. Summary screen that wraps up the module and provides details of where to go to speak up.
2. Attestation screen where learners attest that they will always adhere to anti-bribery and corruption policies.