

Policy, Process & Documentation

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The guidance on the UK Bribery Act 2010 identifies proportionate procedures as one of six guiding principles to mitigate bribery. Up to date policies and procedures underpin every aspect of an effective anti-bribery compliance programme.

Unfortunately there is no 'one-size-fits-all' approach and companies face a challenge in developing policies and processes that comprehensively cover each aspect of anti-bribery compliance and in a manner that suits their business.

Policies and procedures articulate a company's anti bribery stance, show how it will be maintained and help to create an anti bribery culture. They are therefore a necessary measure in the prevention of bribery, but will not achieve that objective unless they are properly implemented (Principles 2 to 6).

Documentation made easy

Whatever the size or sector of your business in the UK or overseas, Interchange has developed, amongst others, a suite of template policies and processes that cover a broad range of needs:

- Codes of ethics/business conduct
- Gifts and hospitality
- Appointment and management of intermediaries/representatives
- Exhibitions
- Donations and sponsorship
- Fraud and related crimes
- Conflicts of interests
- Speaking up/disclosure
- Conducting internal due diligence

Are your business practices up to date?

- Does your company have "adequate procedures" in place to help mitigate the risk of bribery?
- Can you be certain that your management team, employees and business partners/representatives are following your company's ethics policy and procedures?
- Do your business ethics policy and process documents take account of the UK Ministry of Justice guidance published 30th March 2011 on the UK Bribery Act 2010?
- Are any of your business activities subject to the US Foreign Corrupt Practices Act (FCPA)?

"51% of employees perceive that their company code of conduct is not taken seriously, and 47% believe that company policy and procedures are easy to bypass or override"

KPMG Integrity Survey 2008-09



Interchange

Turning Risk into Business Value

Benefits to your Business

We can adapt best practice templates to incorporate your existing procedures and work with you to update and implement new procedures.

We can produce a suite of policy and process documents, formatted using your company branding and language, to provide a comprehensive and robust framework. This can be in web/intranet format or hard copy. These will underpin your anti-bribery compliance programme and be consistent with the Bribery Act 2010 guidance.

A bespoke service is also available. Creating individual documents specific to your needs; for example, an Ethics in Our Company overview for new employees/shareholders, or documents for intermediaries/joint venture business partners/suppliers, whose cultural perceptions of anti-bribery compliance may be different.

Alternatively, you may need to review your existing policies, processes, procedures and documentation to assess your risk exposure and help identify any gaps in your compliance approach.

Policy, process and documentation services from Interchange offer many benefits:

- Identify and understand specific risks to your business
- Update/implement procedures to improve the effectiveness of risk management
- Communicate your ethical values to employees and key stakeholders
- Minimise the risk of ethical breaches through better awareness / understanding / communication
- Create and nurture a positive business culture
- Attract, recruit and retain the best employees
- Actively demonstrate your company's commitment to ethical practices

About Interchange

Formed in 2006, Interchange is an internationally experienced team of hands-on risk experts operating exclusively in the field of mitigating bribery, corruption and fraud risk.

Our sole focus is to help companies and organisations of all sizes and across all sectors underpin their reputations and enhance their business value by taking practical steps towards bribery risk mitigation.

We work with customers across the world to understand and assess the specific risks they face and then help them to develop, implement and embed effective mitigation policies and processes into their companies.

We achieve this through a range of services and products, including executive education and briefings, risk based audits, training, policy, implementation process & documentation, and integrity due diligence of representatives and business partners.

To find out more about Policy, Process & Documentation services from Interchange, please visit:

www.interchange-solutions.co.uk
or telephone +44 (0) 1252 761419



“Procedures - proportionate to the bribery risks a company faces - clear practical, accessible, effectively implemented and enforced”

Principle 1 Ministry of Justice Guidance on procedures to prevent bribery



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