

IS YOUR THIRD PARTY FCPA-COMPLIANT?

9 KEY QUESTIONS

Assessment of these risk areas can help maintain safeguards within third-party partnerships and ensure Foreign Corrupt Practices Act (FCPA) compliance.



TRAINING

Has your company implemented adequate compliance training programs, as well as policies that promote a strong and ethical culture, particularly when they relate to interactions with third parties?



RISK ASSESSMENT

Has your company performed a corruption risk assessment with an emphasis on understanding and assessing local corruption risk indicators, operational controls and residual risk?



GOVERNANCE

What level of global governance and central control does your organization maintain over local anti-corruption efforts and local business activities, and does sufficient transparency exist to manage corruption risk?



TRACKING

How is your organization tracking activities (contracting, employment, human resources issues, sales targeting, marketing, regulatory compliance, research and development) of management, sales personnel and other key parties in local markets around the world?



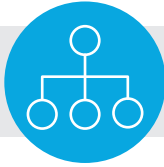
PRESSURE TO PERFORM

How is your organization assessing and monitoring the level of pressure placed on employees and third-party partners to meet global financial performance targets?



COMPENSATION

How closely are you monitoring third-party compensation, including compliance with fair market value pricing requirements, if applicable?



PROXY KNOWLEDGE

What level of understanding does your organization have with regard to instances where third parties are acting on your behalf in each market, and how is the company monitoring potentially inappropriate or high-risk third-party relationships between government officials and local managers, salespeople and others?



IDENTIFICATION

What technology and resources does your organization use to monitor activity and promptly identify, prioritize and address issues. How is your company leveraging data analytics, technology and resources to effectively use available data?



RESPONSE STRATEGY

Does your organization have a documented fraud response strategy that can effectively mitigate the impact caused by FCPA violations?