



Anti-Corruption Compliance in the Field: When “Just say no” is not enough

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Compliance Essentials

- Board and senior management commitment
- Risk-based compliance policy and procedures
- Senior corporate official responsible for compliance
- Education and training
- Disciplinary consequences for non-compliance
- Monitoring and updating



Compliance on the Ground

- Who is potentially exposed
- Who needs to be trained
- Targeted training
- Lines of communication with head office
- Protect your local personnel and expats



Preparing for the Inevitable

- Integrating the compliance function with the business
- From planning to execution to “day-to-day”
- Do employees really understand what is not allowed
- Appreciation of local environment and exposure of local personnel
- Engender trust in compliance advisors



Working with Local Personnel

- Managing the shakedown in real time
 - Consequences of resistance
 - Distinguishing between real shakedown and “flyer”
 - Risk of mixed-messages from head office
- “Just say no” is not guidance
- Target strategy to the circumstances
- Provide local personnel with real-time access to trained compliance advisors and counsel



Resistance and Deflection Strategies

- Wide range of strategies can and have been used successfully
 - Reject, deflect, play "dumb", engage allies, go "above their head", etc
- The right strategy is context-specific
- Plan in advance
- Be prepared to shift strategy
- NOTA BENE: Protect your local personnel and expats!



Questions?



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