

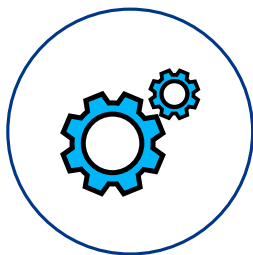


Anti-Bribery & Corruption

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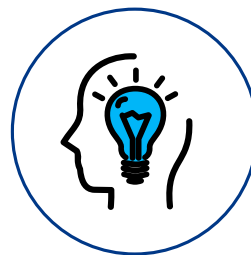
In a nutshell

International laws regarding bribery and corruption have become more stringent over the past few years and infringements are fined with higher amounts. We observe that regulators and law enforcement bodies around the globe are exchanging case-related information and there is a closer co-operation across jurisdictions. We help our clients to prevent, detect and to properly respond to the risk of bribery and corruption.



Client issues

- Are you a multinational company with a footprint or a link to the UK or the US? Are you aware of the relevant national and international bribery and corruption legislation with which you must comply?
- Is it important for your company to have a certified anti-bribery and corruption management system in line with ISO 37 001?
- Do you have an effective compliance program in place that meets the standards and requirements of regulators for the compliance risk bribery and corruption?
- How do you respond to allegations of bribery and corruption?
- Can you vouch that your business partners are not exposed to risks of bribery and corruption?
- Does your internal control system include specific controls to mitigate the risk of bribery and corruption?



Our approach

- Provide ISO 37001 assessments and certifications
- Provide anti-bribery and corruption risk assessment and gap analysis
- Develop anti-bribery and corruption policies and procedures
- Develop a third-party due diligence approach including risk qualification, audit program and training
- Develop and provide anti-bribery and corruption training
- Perform anti-bribery and corruption compliance review at your third parties
- Support companies subject to a deferred prosecution agreement e.g. in conjunction with a monitor
- Conduct bribery and corruption related investigations

Main sectors & clients

Our clients come from all industries, such as automotive, financial services, pharma & chemicals, telecommunication & media, sports federations, commodity trading, construction, and public administration.



How we have helped our clients in the past

Client challenge

A global telecommunications company was under a Deferred Prosecution Agreement (DPA) for three years after accusations of breaching the Foreign Corrupt Practices Act (FCPA), which caused the Department of Justice to impose one of the ten highest FCPA fines. Under the DPA, the company had to implement a thorough and state-of-the-art anti-bribery compliance program. The monitor had to assess the company's compliance program and issue an annual report to the involved authorities.

KPMG response

- Review internal controls around financial reporting on FCPA and anti-corruption requirements for books and record keeping
- Review competence and adequacy of staffing in the finance department and assess work performed by the internal audit and investigation department
- Review anti-bribery risk assessment and internal audit plan on FCPA and review audit work program used for anti-corruption audits
- Assess and evaluate overall compliance of the company's travel, expense and entertainment approval tool and corresponding policies
- Assess in-country bribery reviews of high-risk countries around the globe
- Review internal audits and selected processes identified as at increased risk for potential FCPA violations

Benefits to client

KPMG's global network supported in-country reviews by providing local expertise. The monitor could use KPMG's reports and recommendations directly in its own reports to the involved authorities.



Why KPMG Forensic?

We work proactively to help you achieve compliance, or support your company to react to regulatory or law enforcement actions. We tailor compliance programs for bribery and corruption to each company individually so it fits the industry, relevant regulations, the company's size, and its risk appetite. Drawing on our in-depth knowledge and experience, we can suggest enhancements to your compliance program.

A multidisciplinary team of professionals with hands-on experience will support you locally and internationally to adequately respond to bribery and corruption. With now over 40 accredited Forensic practices worldwide, we can help you in your efforts to achieve the highest level of integrity and to manage the cost and risk of litigation, investigations, and regulatory enforcement actions.



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