



The GoodCorporation Framework on Bribery and Corruption

The GoodCorporation Framework on Bribery and Corruption is based on a core set of practices for the avoidance of corrupt activities in any type of organisation. It sets out management practices that can be assessed to determine how well the organisation's safeguards work in reality.

GoodCorporation uses an independent assessment process that looks at four levels of evidence for each individual practice and assesses them against a five-point scale.

The assessor checks

that a policy exists
policy documents are reviewed

that a system is in place to implement the policy
systems are examined

that records exist which show that the system works
a sample of records is reviewed

that stakeholders agree that the system works in practice
interviews are held with employees, customers, suppliers, public sector officials and other relevant stakeholders

The assessor awards grades

fail
there is no policy or system, or it has largely broken down

minor non-compliance
there is a policy and system but it is not always working

observation
there is a policy and system that works but potential improvements have been identified

merit
the policy and system work well

commendation
the policy and system are examples of best practice

For each assessment a report is provided, giving an independent analysis and grade for each practice. The methodology on which this Framework is based follows that of the GoodCorporation Standard of responsible business management established in June 2001.

This Framework assesses the robustness of an organisation's anti-corruption processes. It is not intended as a tool for identifying or investigating specific corrupt incidents or allegations.

GoodCorporation accepts no liability to third parties for the actions of the assessed organisation or its employees.

The assessment report is intended for internal management purposes only. It is the decision of the assessed organisation whether the content of the report or grades awarded are made public.

GoodCorporation requires that if the content is made public it is a balanced summary of GoodCorporation's report.

The GoodCorporation Framework on Bribery and Corruption

*The organisation is committed to conducting its business with the utmost integrity.
No form of bribery or corruption is tolerated.*

1. Senior management

MAN1: Senior management clearly communicates anti-corruption policies and procedures to all relevant stakeholders

MAN2: Senior management regularly monitors and reviews the processes for guarding against corrupt practices

MAN3: Senior management reports on corruption policies and cases to non-executive directors or the parent organisation (where relevant)

MAN4: Senior management ensures that the organisation abides by all applicable national and international anti-corruption laws, conventions and industry standards

2. Employees

EMP1: Employees commit to follow the organisation's anti-corruption policies and are appropriately trained

EMP2: Employees follow clear rules and controls on the offer and acceptance of gifts and entertainment which ensure that these do not influence business decisions

EMP3: There is a clear policy for employees on conflicts of interest which requires that any potential conflicts are declared and managed

EMP4: There are strict rules and processes to ensure that confidential information is protected

EMP5: There is a confidential process for reporting issues of concern to senior management

EMP6: Disciplinary processes are used to support the observance of the organisation's anti-corruption policies

EMP7: There are processes to ensure that recruitment does not create conflicts of interest

3. Suppliers

SUP1: There are clear and transparent procurement policies for the selection of suppliers and the award of contracts

SUP2: There are clear processes for approving the receipt of goods and the completion of services

SUP3: There is a separation of duties in the approval and payment of invoices

SUP4: Procurement policies are clearly communicated to suppliers

SUP5: Suppliers are informed of the ethical business practices which they are expected to follow and the process for reporting any concerns

SUP6: There is a policy of sanctioning suppliers where corrupt activity is discovered

4. Customers

CUS1: No inducements in cash or in kind are offered to individuals to influence business decisions

CUS2: There are controls in place on the setting of prices and discounts

CUS3: There are well-defined guidelines for carrying out major bids, which ensure that expenditure is devoted to the quality and communication of the bid only

CUS4: Any sales intermediaries and agents who are appointed operate according to guidelines consistent with the organisation's policies on bribery and corruption

5. Public sector

PUB1: There are clear rules for the conduct of relations with public officials and no form of facilitation payments is allowed

PUB2: The company engages in constructive dialogue with government where it encounters corruption as a material business issue

PUB3: The company makes public its commitment to combat corruption and actively participates in appropriate anti-corruption initiatives

PUB4: There are guidelines which ensure that lobbying is conducted in a responsible manner