

ANTI-CORRUPTION MEASURES

Developed by Professors Thomas Dunfee and David Hess of The Wharton School

The following measures are offered to all firms, wherever situated, and whatever their lines of business. The Caux Round Table commends them for consideration by business corporations.

1. Disclose publicly and make widely known its endorsement of the Anti-Corruption Measures.
2. Establish a clearly articulated written policy prohibiting any of the firm's employees from paying or receiving bribes and "kickbacks."
3. Implement the policy with due care and take appropriate disciplinary action against any employee discovered to have made payments in violation of the policy.
4. Provide training for employees to carry out the policy, and provide continuing support, such as help lines, to assist employees to act in compliance with the firm's policy.
5. Record all transactions fully and fairly, in accordance with clearly stated record-keeping procedures and accounting controls, and conduct internal audits to assure that all payments made are proper.
6. Report annually on the firm's bribery and corruption policy, along with a description of the firm's experiences implementing and enforcing the policy.
7. Have the annual report in step six above audited either by an independent financial auditor or an independent social auditor, or both.
8. Require all agents of the firm to affirm that they have neither made nor will make any improper payments in any business venture or contract to which the firm is a party.
9. Require all suppliers of the firm to affirm that they have neither made nor will make any improper payments in any business venture or contract to which the firm is a party.
10. Establish a monitoring and auditing system to detect any improper payments made by the firm's employees and agents.

11. Report publicly any solicitations for payments whenever such reporting will not lead to harsh reprisals of material consequences to the company or its employees (or report privately to a monitoring organization, such as Transparency International or a social auditor).
12. Establish a system to allow any employee or agent of the firm to report any improper payment without fear of retribution for their disclosures.

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