ICC Ethics and Compliance Training Handbook

Anti-corruption guidance by practitioners for practitioners

Edited by
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Contents

FOREWORD
by Jean-Guy Carrier ................................................................................................................... 5

CHAPTERS
1. François Vincke
   A Daunting but Fascinating Task ................................................................. 8

   PART I: The Fundamentals
2. Fritz Heimann
   The International Anti-corruption Conventions ........................................... 18
3. Jean-Yves Trochon
   The Global Antitrust Landscape ......................................................................... 32
4. Jean-Pierre Méan
   Glossary .......................................................................................................................... 42

   PART 2: How to Organize Compliance in Your Company
5. Jean-Daniel Lainé
   Risk Assessment ........................................................................................................ 54
6. Pedro Montoya
   The Role of the Board of Directors ................................................................. 63
7. Dominique Lamoureux
   Codes of Conduct ........................................................................................................ 71
8. Carlos Desmet
   The Ethics and Compliance Function and Its Interface with Management,
   Control, and Audit .................................................................................................... 82
9. Annette Kraus and Julia Sommer
   The Compliance Challenge for Smaller Companies ........................................... 90

   PART 3: Appropriate Measures
10. Corinne Lagache
    Education and Training .......................................................................................... 100
11. Michael Davies, Q.C.
    Whistleblowing ........................................................................................................ 109
12. Juan Jorge Gili
    Internal Investigations .............................................................................................. 115
13. Iohann Le Frapper
    Resisting Solicitation ................................................................................................ 124
PART 4: Managing Business Relationships

14. Richard Battaglia and Lucinda Low
   **Agents, Intermediaries, and Other Third Parties** .................................................. 136
   APPENDIX – Due Diligence Sample Checklist .......................................................... 151

15. Massimo Mantovani
   **Joint Ventures** ........................................................................................................ 152
   APPENDIX A – Due Diligence Guidelines ................................................................. 161
   APPENDIX B – Red Flags .......................................................................................... 163

16. François Vincke
   **The ICC Anti-corruption Clause (2012)** ............................................................. 165

17. Max Burger-Scheidlin
   **Managing the Transition to a Clean Commercial Policy** ...................................... 171
   ANNEX I – ICC Rules on Combating Corruption .................................................... 179
   ANNEX II – ICC Anti-corruption Clause .................................................................. 189
   ANNEX III – Key International Legal Instruments .................................................... 202
Foreword
Jean-Guy Carrier
Secretary General, International Chamber of Commerce (ICC)

ICC and the market economy
The fight against corruption and anti-competitive practices is engrained in ICC’s DNA. For ICC, the promotion of an open world economy, based on fair competition, has been a prime objective since its founding nearly 100 years ago. ICC today brings together millions of companies into the largest international business network and continues its leadership role in advocating high standards of corporate governance based on ethical business practices. In 1977, it became the first international organization to issue a set of Rules and Recommendations prohibiting all forms of corruption in business transactions.

A frontrunner on compliance
However, the mere condemnation of corruption is not enough. ICC has expanded its mission over the years to help companies generate a culture of integrity. This was done by the development of corporate Codes of Conduct, the establishment of ethics and compliance programmes, and the appointment of ethics and compliance officers. ICC’s message about the need for business integrity and compliance was spelled out in the three editions of Fighting Corruption, ICC’s International Corporate Integrity Handbook, which was first published in 1999 and re-edited in 2003 and 2008.

A need for practical education and training
Where do we stand today? High-quality international legal instruments to fight corruption have been adopted and integrated into the national laws of an increasing number of countries. There is now a strong awareness among business leaders about the need for integrity in commercial transactions. These corporate leaders have signalled their determination to accept nothing less than the highest standards. There is still, however, a perceived lack of practical implementation on the part of government and business.

Many companies have voiced their concern about a gap between the principles laid down in statutes and the realities they face in the field. They report being confronted with solicitation of bribes from politicians and public officials as well as unfair practices by competitors. Small and medium-sized companies continue to struggle with the implementation of new legal and ethical standards. Compliance officers and their teams are in need of solid and pragmatic support.

A World Economic Survey conducted by ICC and the Institute for Economic Research in Munich during the fourth quarter of 2012 shows that business experts worldwide strongly support the view that a greater emphasis on ethics and compliance training in their respective countries would improve productivity and attract foreign investment. Respondents from emerging markets overwhelmingly supported the statement.

What compliance officers want is effective guidance for their day-to-day work and not additional declarations of intent. A growing number of companies wish to benefit from down-to-earth integrity training provided by experienced practitioners. For example, installing a whistleblowing system, performing a risk assessment, exercising due diligence when selecting agents or intermediaries, and conducting internal investigations are all difficult and delicate policies to implement.
In its recommendations to G20 heads of state and government, the global business community (as represented by the B20) identified the need to develop training materials and provide concrete practical training on anti-corruption compliance, including ‘train the trainers’ and other educational programmes, as one of the six top priorities to advance G20 and B20 work in the field of anti-corruption.

This Ethics and Compliance Training Handbook is a direct response to this call. The following pages address, independently from theoretical considerations, the challenges which companies of all sizes must overcome in order to build and implement their corporate compliance programmes. It is a guide designed by and for compliance practitioners.

This Training Handbook will serve as the cornerstone of a Global Training Programme which ICC will develop and deliver with its network of national committees and chambers of commerce around the world. Each chapter of this Handbook is conceived as a module for a training session on a key compliance topic. Through this Handbook and the training sessions based on its successive chapters, the compliance officers of today and tomorrow will benefit from the hands-on expertise of distinguished fellow practitioners in the field of corporate integrity.

It is our hope that the compliance officers who will enrol in this ICC Global Training Programme will in turn train their colleagues and successors, and thus contribute to fostering a culture of ethics and compliance across today’s global markets.