



We help our clients to develop internal regulations and procedures aimed at preventing bribery and corruption, also known as “Compliance”.

**Analysis of internal documents and sample testing of processes**

We help analyze compliance with anti-bribery and corruption legislation, including the Foreign Corrupt Practices Act (FCPA), UK Bribery Act and the local regulatory requirements.

Using our internally developed methodology, we analyze accounting data, hardcopy and electronic documents to identify potential weaknesses in anti-bribery and anti-corruption procedures and develop recommendations to address the potential weaknesses.

**Development of internal regulations and customization of control framework**

We assist our clients to develop and enhance policies and other documents, from internal regulatory documents to job descriptions. We assist in the development of special anti-bribery and anti-corruption procedures, such as the prevention of conflicts of interest, gift and entertainment procedures, and policies on sponsorship and charity.

Our team has wide experience implementing whistleblower hotlines, including the launching of hotline channels, the development of allegations review procedures and conducting investigations.

We also help our clients to implement control frameworks, for areas such as buy and purchase processes, including the consideration of discounts and special conditions, and control of payment documents to identify potential violations of anti-bribery and anti-corruption requirements.

**Our advantages:**

- We are the leading Forensic practice in Ukraine and abroad providing anti-bribery and anti-corruption services;
- We have deep understanding of the issues related to implementing anti-bribery and corruption procedures;
- Our team consists of highly qualified professionals with extensive compliance experience in large companies in different industries;
- Deloitte Forensic has successfully conducted many projects on enhancing anti-bribery and anti-corruption processes in Ukraine and abroad.

**Deloitte can help you implement or improve the main anti-bribery and anti-corruption mechanisms:**

1. Appointment of a compliance officer, who is responsible for developing and implementing anti-bribery and corruption measures, and providing the compliance function with all necessary resources;
2. Internal regulations including a Code of Ethics and special anti-corruption procedures and embedding these into operations;
3. A whistleblowing hotline and procedures for reviewing and investigating allegations;
4. Regular monitoring of the efficiency of anti-bribery and anti-corruption processes;
5. Due diligence of employees and counterparties to identify conflicts of interest and prevent compliance risks;
6. Advisory and training procedures.

**Anti-bribery and anti-corruption services help address the requirements of:**

- Counterparties who seek certain policies and procedures in order to do business
- Strengthened legislation/regulatory policies
- Shareholders or another supervisory body

**These services also can help during:**

- Acquisition due diligence
- Implementation or enhancement of anti-bribery and anti-corruption mechanisms
- Identification and resolution of conflicts of interest

**Our select experience:**

**Subsidiary of a major automotive company**

Our team analyzed all of the company's anti-bribery and anti-corruption measures against the shareholders' compliance requirements, which included a number of anti-bribery and anti-corruption processes. We provided a number of recommendations to amend existing procedures.

**Subsidiary of a major tire production company**

Our team analyzed the compliance policies of the company's headquarters and assisted in the implementation of these measures in the local subsidiary according to regulatory requirements and the business practices of the company.

**Gap analysis of FCPA requirements**

We assisted a large pharmaceutical company in a review of their expenses against FCPA requirements and the company's internal requirements, including compliance procedures. We identified a number of deviations from internal procedures. The company used our recommendations to enhance its business processes and compliance procedures.

**Major oil and gas company in Kazakhstan**

Our team was engaged in a long-term project on enhancing the whistleblowing processes of a large oil and gas company. Our team helped the company to fine-tune the overall whistleblowing process from receiving allegations to recommendations for amending internal procedures according to the results of investigations. This allowed the company to further maintain the whistleblowing process without any assistance from third parties.

# Contacts



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