



Communication and Training

Companies should ensure that their bribery prevention policies and procedures are embedded and understood throughout the organisation through internal and external communication, including training, that is proportionate to the risks it faces.

Communication and training deter bribery by associates by enhancing awareness and understanding of the organisation's procedures and their commitment to the proper application of those procedures. Making information available assists with more effective monitoring, evaluation and review of bribery prevention procedures. Training provides the knowledge and skills needed to implement procedures and deal with any bribery related problems or issues that may arise.

Communication

Effective internal and external communications will convey a clear top-level commitment and dedication to the company's anti-bribery policies and make employees aware of how they can apply on a day to day basis the particular anti-bribery policies that are relevant to them.

Through communications and training, employees and other associates whose functions expose them to greater bribery risk should be made aware of the consequences of engaging in foreign bribery, how they are expected to respond to bribe solicitation and where and how to report bribery concerns.

Internal communications should cover a broad range of policies. Some examples on topics include the following:

- Decision making
- Financial control
- Hospitality and promotional expenditure
- Facilitation payments
- Training and education
- Charitable and political donations
- Penalties for breach of rules
- Management roles with responsibility for anti-bribery functions

Bribery prevention policies should be communicated and accessible to all associates. The policies themselves, or guidance material describing their practical application, may be communicated through:

- Website
- Staff handbooks
- Guidelines
- Intranet
- Notices
- Training and education materials



Australian Government

Australian Trade and Investment Commission

By making public statements about their anti-bribery policies or publishing a high-level mission statement about foreign bribery, companies can help to demonstrate their dedication to compliance with anti-bribery laws and contributes to promoting a culture of integrity.

Companies are encouraged to adopt a reporting mechanism that allows internal and external stakeholders to raise concerns about bribery risks, report instances of bribery or bribery solicitation, request advice and suggest improvements to anti-bribery policies and procedures.

An effective reporting mechanism is secure, confidential and accessible and provides adequate protections for people who make reports. One option that may be considered is a reporting mechanism operated by an external service provider as an independent third party.

Training

The nature of training that should be provided will depend on a risk assessment carried out to identify the types and level of risks. This will enable training to be designed to target and mitigate the particular risks the company faces. It is necessary to provide training to the company's employees, directors and managers and may be necessary for other associates, such as agents, contractors and suppliers, depending on risk.

Training should cover general and sector specific bribery risks and the company's anti-bribery policies and procedures (particularly those procedures relevant to the people receiving the training). Companies should consider providing tailored training to employees who face particular corruption risk, such as roles in contracting, marketing and sales and roles based overseas or that interact with foreign public officials.

Companies may wish to incorporate case studies and other real-life scenarios relevant to its business, clients and markets. Training should be delivered to new employees or agents on a risk basis as part of induction and be continuous. Training delivery and materials should be reviewed periodically to ensure they address contemporary bribery risks and the needs of training recipients.