Get What You Need Out of Your Gift, Entertainment and Travel (GET) Policy and Approval System

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Tuesdays with Bernie Episode – La Trivi-ata

S1EP05 - La Trivi-ata (Anti-Trust: Bribery and Gifts):

Start Video
Objectives

- Why Does GET Matter?
- Developing a GET Policy
- GET Registration and Approval System
- Vended Solution or Internal Platform
- Customization to Rollout
- Monitoring and Reconciliation
- Lessons Learned

Why Does GET Matter?

- Creates transparency:
  - Types of GET, value, frequency, business purpose, government affiliation, avoid conflicts of interest

- Helps ensure compliance with:
  - Anti-corruption laws, including U.S. federal, state, and local gift laws
  - FCPA, the UKBA, and the anti-corruption laws of other countries, where companies conduct business
Developing a GET Policy

- Assess Your Risk
- Meet with Stakeholders
- Determine Approval Thresholds
- Establish Requirements
- Identify Exceptions
- Develop GET Resource Guide / FAQ
- Online or In-Person Training
- Consequences of Non-Compliance

GET Registration and Approval System

- Business Requirements and Budget
- Approval Workflow
- Search Criteria and Reporting
- Testing
- Communication
- Delegating Approvals
- System Quick Reference Guide
Vended Solution or Internal Platform

**Vended**
- Limited Customization
- Short Implementation
- External Hosting
- References Available
- Contractually-Bound
- Cost May Increase

**Internal**
- Fully Customizable
- Long Implementation
- Internal Hosting
- Onsite Support
- Costs May Remain Level

Customization to Rollout

**Design**
- Project Scope
- Budget
- Business Requirements
- GET Type Multi-Select
- Attachments
- Search Fields
- Reports
- Currency-Converter
- Interface with Expense System

**Customize**
- Solution Requirements
- Approval Tiers
- Workflow:
  - Initiating Event
  - Recipient
  - Action
  - Terminating Event
- Delegating Approvals
- Deleting
- Cloning
- Unlocking
- Cancelling
- Adding additional information
- Email Notification

**Test**
- Identify Testers
- Allocate Time
- Develop Testing Script

**Rollout**
- Reference Materials:
  - System Quick Reference Guide
  - GET Policy Resource Guide
  - Thresholds Chart
  - Infographic
- Training:
  - Information Sessions
  - Online Training
- Communications

Communications
Post-Rollout: Monitoring and Reconciliation

Monitor

- Establish Controls
- Develop Monitoring Process
- Daily System Activity
- Periodic Reporting
- Audit Findings
- Hotline Matters
- Identify Trends

Reconcile

- Reconcile Against Controls
- Develop Reconciliation Process
- Research Variances
  - Travel and Expense System
- Document Exceptions
- Consequences of Non-Compliance

Lessons Learned

- Policy Evolution
- Threshold Adjustments
- System Corrections
- Workflow Changes
- Business Requirements
- Integration of GET System and Travel and Expense System
- Ongoing Training
Questions?

Just For Fun

S2EP03 – All Business (Extravagant Gifts)

Start Video