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 Trees
- Workflow
  - Initiating Event
  - Recipient
  - Action
  - Terminating Event
- Delegating Approvals
- Dealing
- Unlocking
- Cancelling
- Adding additional information
- Email Notification

Test
- Identify Testers
- Allocate Time
- Develop Testing Scripts

Rolllout
- Reference Materials
  - System Quick Reference Guide
  - GET Policy Resource Guide
  - Thresholds Chart
  - Infographics
  - Training
  - Information Sessions
  - Online Training
  - 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