

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

GET



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Tuesdays with Bernie Episode – La Trivi-ata

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

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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

<p>Vended</p> <ul style="list-style-type: none"> ▪ Limited Customization ▪ Short Implementation ▪ External Hosting ▪ References Available ▪ Contractually-Bound ▪ Cost May Increase 		<p>Internal</p> <ul style="list-style-type: none"> ▪ Fully Customizable ▪ Long Implementation ▪ Internal Hosting ▪ Onsite Support ▪ Costs May Remain Level
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Customization to Rollout

Design	Customize	Test	Rollout
<ul style="list-style-type: none"> ▪ Project Scope ▪ Budget ▪ Business Requirements ▪ GET Type Multi-Select ▪ Attachments ▪ Search Fields ▪ Reports ▪ Currency-Converter ▪ Interface with Expense System 	<ul style="list-style-type: none"> ▪ Solution Requirements ▪ Approval Tiers ▪ Workflow: <ul style="list-style-type: none"> - Initiating Event - Recipient - Action - Terminating Event ▪ Delegating Approvals ▪ Deleting ▪ Cloning ▪ Unlocking ▪ Cancelling ▪ Adding additional information ▪ Email Notification 	<ul style="list-style-type: none"> ▪ Identify Testers ▪ Allocate Time ▪ Develop Testing Script 	<ul style="list-style-type: none"> ▪ Reference Materials: <ul style="list-style-type: none"> - System Quick Reference Guide - GET Policy Resource Guide - Thresholds Chart - Infographic ▪ Training: <ul style="list-style-type: none"> - Information Sessions - Online Training ▪ Communications

Post-Rollout: Monitoring and Reconciliation

Monitor	Reconcile
<ul style="list-style-type: none"> ▪ Establish Controls ▪ Develop Monitoring Process ▪ Daily System Activity ▪ Periodic Reporting ▪ Audit Findings ▪ Hotline Matters ▪ Identify Trends 	<ul style="list-style-type: none"> ▪ Reconcile Against Controls ▪ Develop Reconciliation Process ▪ Research Variances <ul style="list-style-type: none"> o 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

The diagram shows a central black box with the text 'LESSONS LEARNED' in white. This central box is surrounded by six white boxes, each containing a term: 'Planning' (top), 'Cost' (top-right), 'Time' (right), 'Training' (bottom-right), 'Reconcile' (bottom), and 'Integration' (left). These boxes are connected by a thin circular line.

A slide with a background of concentric circles. On the left, there is a vertical black bar with the letters 'G', 'E', and 'T' stacked vertically. To the right, there is a large white thought bubble with the text 'Questions?' inside. Below the main bubble are two smaller, fainter thought bubbles.

Just For Fun

S2EP03 – All Business (Extravagant Gifts)

[Start Video](#)
