

PACT Compliance Assessment

The PACT Compliance Assessment is designed to evaluate the extent to which organisations' anti-corruption policies and practices align with the PACT framework developed by the Corrupt Practices Investigation Bureau (CPIB). It serves to identify strengths, gaps, and areas for improvement in their anti-corruption systems.

By uploading and submitting the completed assessment form, you acknowledge and consent that:

- The information provided is accurate to the best of your knowledge.
- Assessment outcomes may be used for internal benchmarking or advisory purposes. (Note: All data shared will be treated in accordance with applicable data protection and confidentiality policies.)
- Submission does not constitute or imply any form of certification, endorsement, or official clearance by CPIB or related authorities.

Instructions

The assessment form comprises 4 sections. For each assessment item in all sections, please assign a score based on your organisation's level of implementation, and include relevant supporting evidence or remarks.

Scoring guide:

- *0 = Not Implemented*
- *1 = Minimally Implemented*
- *2 = Partially Implemented*
- *3 = Mostly Implemented*
- *4 = Fully Implemented*

Example

Item	Implementation level (0-4)	Evidence/Remarks
Improvements made in response to internal or external feedback and audit findings	3	Major improvements have been implemented. However, responses to external audit recommendations are not always timely.

Section 1: Organisational Commitment

Enduring commitment to ethical leadership and governance cultivates corporate integrity. The following items assess your organisation's implementation of processes that support this commitment.

I/N	Items	Implementation level (0-4)	Evidence/Remarks
1.1	Formal declaration of zero-tolerance stance towards corruption by senior management.		
1.2	Promotion of core values such as integrity, meritocracy, and transparency by senior management.		
1.3	A code of conduct that addresses the following: <ul style="list-style-type: none">- Corrupt behaviour- Conflict of interest- Gifts and entertainment- Obtaining personal loans from clients/customers		
1.4	An anti-corruption policy that features the following:		

	<ul style="list-style-type: none"> - Declaration to abide by Singapore's anti-corruption laws - Denouncement of any form of corruption and bribery - Undertaking to set-up, maintain and regularly review corruption susceptible operational processes - Supporting and protecting whistle-blowers - Compliance to regular monitoring and auditing 		
1.5	Documentation and communication of the anti-corruption policy and code of conduct to all employees and relevant stakeholders (e.g., business partners).		

Section 2: Risk identification and Management

Effective identification and management of corruption risks is critical to safeguard a corruption-free organisation. The following items assess your organisation's implementation of risk identification and management mechanisms.

I/N	Items	Implementation level (0-4)	Evidence/Remarks
2.1	Periodic risk assessments that identify and address vulnerable work processes and job functions.		
2.2	Communication and enforcement of gift and entertainment policies.		
2.3	Processes for employees to declare any actual or perceived conflict of interest		
2.4	Record and track the linkage of contributions and sponsorships to measurable business benefits.		
2.5	Conduct of due diligence on high-risk third parties and vendors.		

Section 3: Controls & Communication

The implementation and communication of internal controls strengthen corruption prevention and compliance to the organisation's anti-corruption framework. The following items assess your organisation's implementation of anti-corruption controls and communication processes.

I/N	Items	Implementation level (0-4)	Evidence/Remarks
3.1	Internal controls including the following: <ul style="list-style-type: none">- Accurate records of transactions- Clear operating procedures- Audit checks		
3.2	A whistle blowing/reporting system that features the following: <ul style="list-style-type: none">- Clear reporting chain such as a suitably appointed person/team to follow-up on suspected corruption- Conveniently accessible reporting mechanism (such as a designated phone number/ email address)		

	<ul style="list-style-type: none"> - Diligent follow-up with the complainant (if known) on the outcome of the investigation 		
3.3	Communication of the organisation's anti-corruption framework to employees during onboarding and regular anti-corruption training/awareness programs		
3.4	Communication of the organisation's anti-corruption framework to business partners, suppliers, and other stakeholders.		

Section 4: Monitoring & Improvement

Ongoing monitoring and continuous improvement are essential to maintaining a corruption-free organisation. They ensure that anti-corruption measures remain effective and responsive to evolving threats. The following items evaluate your organisation's implementation of efforts to monitor, review, and improve anti-corruption measures.

I/N	Items	Implementation level (0-4)	Evidence/Remarks
4.1	Periodic evaluation of anti-corruption controls and policies based on the following criteria: <ul style="list-style-type: none">- Efficacy of existing system to prevent corruption- Efficiency in keeping operation costs low- Sustainability of the system to combat corruption in the long run		
4.2	Improvements made in response to internal/external feedback or audit findings.		
4.3	Communication of evaluation results and policy updates to all employees and relevant stakeholders.		

Reviewed by: _____

Date: _____

