

Preventing Global Corruption

Risk Assessment Checklist

IDENTIFY POTENTIAL COMPLIANCE RISK AREAS

- ☐ Determine what countries you conduct business in.
- ☐ Identify the specific healthcare organizations and local government entities you work with or plan to work with.
- ☐ Review country, healthcare organization, and local government compliance laws, policies, and guidelines.
- ☐ Ensure your business practices align accordingly.

Work with your organization's legal resources and Owens & Minor Compliance team as needed for assistance.

ESTABLISH A COMPLIANCE PROGRAM

- ☐ Identify specific Compliance job responsibilities and leadership.
- ☐ Establish a process or system for reporting compliance concerns.
- ☐ Create policies and procedures, as needed.
- ☐ Complete and assign annual compliance training.
- ☐ Ensure transparent business communications.
- ☐ Periodically audit and monitor payments made to healthcare professionals and government officials.
- ☐ Enforce compliance standards through clear disciplinary guidelines.
- ☐ Respond quickly to reported offenses and implement appropriate corrective actions.

UPHOLD A COMMITMENT TO COMPLIANCE

- ☐ Demonstrate compliant behavior to all employees and business partners at all times.
- ☐ Make compliance a defined part of new hire onboarding programs.
- ☐ Consider compliant business practices a part of employee performance reviews.
- ☐ Distribute copies of the Vendor Code of Honor and any applicable laws and policies, at least annually. Allow for open discussion about how these materials apply to everyone's roles.
- ☐ Provide compliance reporting options to employees and business partners frequently.