

Preventing Global Corruption

Four Easy Steps to Manage Compliance

A GUIDE FOR O&M DISTRIBUTORS AND THIRD-PARTIES

High standards for ethical and compliant behavior guide everything we do at Owens & Minor. We expect our valued vendors to share this same guiding principle.

A Competitive Advantage

A strong compliance program enables you to proactively prevent compliance issues before they happen. It also allows you to make compliance a true competitive advantage. You will gain and uphold the trust of employees and business partners alike, along with saving time and money by avoiding business disruption due to compliance issues.

Your Responsibility

Regardless of the size or scope of your distribution business, you are responsible to take reasonable steps to create, implement, and maintain an appropriate and effective compliance program. Keep in mind, each global region and market may have their own restrictions and requirements as well. O&M is here to support you in this endeavor with resources, tools, templates, and more.

STEP 1: Complete and Implement a Distributor Training Program

Corruption can occur in many types of business situations. Through comprehensive training, you can find out how to identify and prevent it, as well as what laws you need to be aware of. All new hires should also be provided timely anti-corruption training.

STEP 2: Create and Use Compliance Tools for Your Business

Lay the foundation of your compliance program using specific tools and templates for your business, based on the compliance risks you face. By accurately tracking expenses, abiding by the Vendor Code of Conduct, creating applicable policies, and accurately tracking expenses, you help ensure your business, along with the patients you support, remains compliant and fully operational.

Management oversight and emphasis on compliant business practices are critical to long-term compliance program success. Keep and maintain accurate documentation. Also, consider periodically auditing a sample of payments to healthcare professionals or government officials and establish corrective actions as needed.

STEP 3: Review Company Laws, Policies, and Values

Strict laws, especially in the United States and Great Britain, govern interactions with healthcare professionals and government officials. O&M has several policies and guides to help you understand and abide by these laws and requirements.

STEP 4: Ask Questions and Report Concerns

We need to know if there is an issue or concern, so we can take actions to fix it. You are required to promptly report all potential or suspected violations and are encouraged to reach out to O&M with any questions.