

## Preventing Global Corruption

# Pause Before Proceeding

### IDENTIFY POTENTIAL ANTI-CORRUPTION CONCERNS

It is often helpful to pause before proceeding with any business decision, especially if it may be prohibited by anti-corruption laws and policies. Here are some situations to be particularly aware of as they have the potential to become corrupt.

#### Payments Made to Healthcare Professionals or Government Officials

Review all payments for consulting services, royalties, and HCP-reimbursed expenses, including those for educational conferences or product training sessions.

**PAUSE IF...**a payment is not fully documented and approved.

**PAUSE IF...**a payment is requested for a family member or alternate business organization.

**PAUSE IF...**requests for payments to be made to alternate countries.

**PAUSE IF...**expense reimbursements appear excessive or unclear.

**PAUSE IF...**extended travel is requested.

#### Payments Made to Charitable Organizations

Review all payments for corporate sponsorships of events and all grants and donations.

**PAUSE IF...**a payment is requested to be provided to an individual rather than a documented charitable organization.

**PAUSE IF...**charitable giving is tied to a political organization or campaign.

#### Payments Made to Employees

Review all payments submitted for reimbursement that relate to a healthcare professional or government official business meeting, meal, travel, lodging, or educational item.

**PAUSE IF...**an expense submission does not include an itemized receipt AND list of attendees.

**PAUSE IF...**educational item reimbursements do not appear to have a defined educational value.

**PAUSE IF...**requests for payment are related to golfing, sporting events, or general tourism.

*This is not a comprehensive list of potential corruption concerns. Use your best judgement to identify and report all actual or suspected corruption situations.*