

## Preventing Global Corruption

# Risk Assessment Checklist

### IDENTIFY POTENTIAL COMPLIANCE RISK AREAS

- ☐ Determine the countries where you conduct business.
- ☐ 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 the O&M Compliance team as needed for assistance.

### ESTABLISH A COMPLIANCE PROGRAM

- ☐ Identify specific Compliance job responsibilities and leadership.
- ☐ Establish a system and process for reporting compliance concerns.
- ☐ Create policies and procedures, including a Code of Conduct, as needed.
- ☐ Complete and assign annual compliance training.
- ☐ Ensure transparent business communications.
- ☐ Periodically audit and monitor payments made to healthcare professionals and government officials. Keep records of these audits.
- ☐ 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 each employee's role.
- ☐ Provide compliance reporting options to employees and business partners frequently.