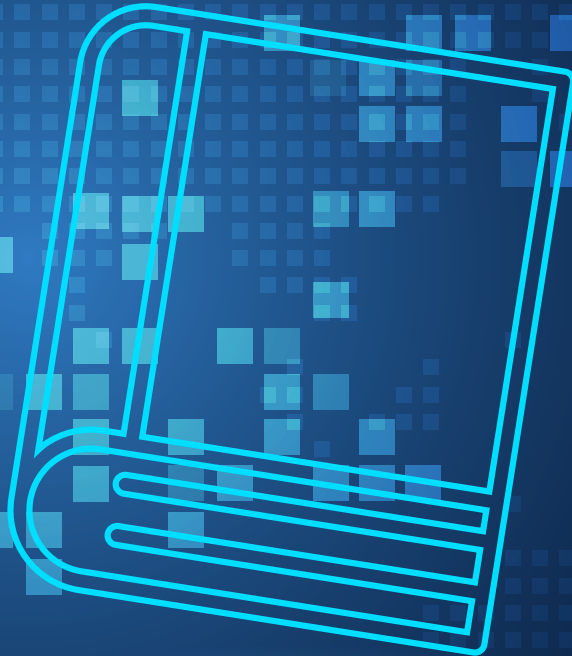


A Short Corruption Prevention Reference Guide for the **Private Sector** in the **Pacific**



Working Version

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Pacific Anti-Corruption Project

The project aims to strengthen implementation of anti-corruption measures at national, sub-regional and regional levels. It does so through supporting key public sector organizations to scale up their systems and mechanisms to implement accountability frameworks. The project also supports promotion of 'right to information' agenda, including citizens' access to information, open data and oversight role of non-state actors.

The project combines efforts for a more accountable and transparent institutions, contributing to advancement of the 'Teieniwa' Pacific Unity against Corruption Vision and progress against Agenda 2030 and the Sustainable Development Goals. It focuses on Sustainable Development Goal 16 on building peaceful, just, and inclusive societies through strengthening integrity anti-corruption systems at national and subnational level.

United Nations Development Programme (UNDP)

UNDP is the leading United Nations organization fighting to end the injustice of poverty, inequality, and climate change. Working with our broad network of experts and partners in 170 countries, we help nations to build integrated, lasting solutions for people and planet. Learn more at undp.org or follow [@undp](https://twitter.com/undp).

The policies and procedures discussed in this guide do not necessarily represent those of the United Nations, including UNDP, or the UN Member States. Many excellent anti-bribery and corruption policy and procedure publications exist to support private sector organizations, but not all could be referenced. Nevertheless, the examples given represent some of the highest standards available.

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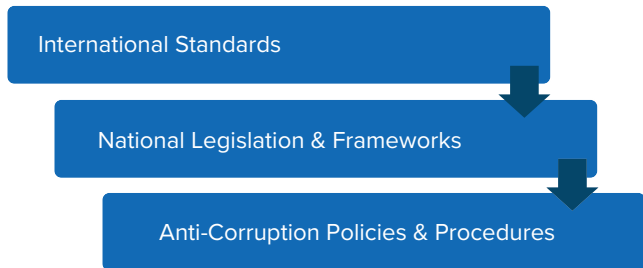
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— Overview

This short guide summarizes some of the major official instruments and initiatives available to help private sector organizations, including state owned enterprises, identify and prevent corruption. It also provides guidance based on corruption prevention policies and procedures developed by prominent international organizations and further reference material.

One approach to reducing corruption relies on ‘top-down’ interventions in the form of external controls. An alternative approach relies on ‘bottom-up’ monitoring and advocacy for reform and action. The guide adopts a top-down approach based on international standards, national legislation, and recognized internal anti-corruption policies and procedures.

This relationship can be illustrated as follows:



A top-down approach aligns with anti-bribery and corruption frameworks that emphasize commitment by organizational leaders. This recognizes that without commitment and drive from the top, anti-bribery and corruption policies and procedures will fail.

Relevance to Pacific private sector organizations

Corruption has global reach and the techniques used to pay bribes and induce corruption are universal. International anti-corruption standards must therefore be applied by countries regardless of location.

Corruption and gender

Corruption affects all genders differently, and gender inequality exacerbates corruption risks that disproportionately affect women and vulnerable groups of society. Past studies¹ have found that women usually encounter corruption: i) when accessing basic services, markets and credit, ii) while engaging in the public space and electoral politics, iii) in situations of specific vulnerability and human rights abuses notably when accessing remedy for gendered discrimination or violence. UNDP in Solomon Islands, for instance, found that women are more likely than men to be asked for sexual favours as the currency of bribes, and when accessing services on behalf of their family they are more often required to pay ‘speed money’ or bribes.²

While gender equality is included as Goal 5, one of the 17 Sustainable Development Goals (SDGs), gender equality is critical to achieving a wide range of objectives pertaining to sustainable development³, including Goal 16, which addresses corruption as part of the commitment to enhancing peace, justice and strong institutions. The same is true of countering corruption which is fundamental not only to the achievement of the SDGs but a key enabler to their sustainability.⁴

Relevance to Pacific private sector organizations

All Pacific countries have committed to the achievement of the 17 SDGs. Private sector is recognized as a key partner to the achievement of the universally adopted SDGs. Addressing gendered dimensions in corruption and promoting non-discrimination and gender equality in combatting corruption are indispensable to sustainable business and society.

¹ Swedish Cooperative Centre and Vi Agroforestry (2008) Anti-Corruption Policy for SCC and Vi Agroforestry referred in UNDP (2012). Seeing Beyond the State: Grassroots Women’s Perspectives on Corruption and Anti-Corruption.

² Soaki, P. (2019) ‘How do women feel the effects of corruption?’ *UNDP*, 11 June. Available at: <https://www.undp.org/pacific/blog/how-do-women-feel-effects-corruption>.

³ UNDP (2019) *Gender Equality as an Accelerator for Achieving the SDGs*. Available at: <https://www.undp.org/publications/gender-equality-accelerator-achieving-sdgs#:~:text=February%202019&text=lt%20therefore%20argues%20that%20accelerating,towards%20achieving%20the%202030%20Agenda>.

⁴ UNODC (2020) *The Time is Now – Addressing the Gender Dimensions of Corruption*. Available at: https://www.unodc.org/documents/corruption/Publications/2020/THE_TIME_IS_NOW_2020_12_08.pdf.

— International standards

Two primary international anti-corruption standards apply to private sector organizations:

1. The United Nations Convention against Corruption (UNCAC)
2. The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Anti-Bribery Convention).

United Nations Convention against Corruption (UNCAC)

[The UNCAC](#) is the only universal legally binding anti-corruption instrument. It addresses many different forms of corruption including bribery, trading in influence and abuse of function, and covers five main areas:

1. Prevention
2. Criminalization and law enforcement
3. International cooperation
4. Asset recovery
5. Technical assistance and information exchange.

[Article 12](#) specifically refers to the private sector:

Each State Party shall take measures, in accordance with the fundamental principles of its domestic law, to prevent corruption involving the private sector, enhance accounting and auditing standards in the private sector and, where appropriate, provide effective, proportionate and dissuasive civil, administrative or criminal penalties for failure to comply with such measures.

Preventative measures include:

- Promoting cooperation between law enforcement agencies and relevant private entities.

- Promoting the development of standards and procedures designed to safeguard the integrity of relevant private entities, including codes of conduct, and the prevention of conflicts of interest.
- Ensuring private enterprises have sufficient internal auditing controls to prevent and detect corruption.

[Article 21](#) provides a definition of bribery for the private sector.

OECD Anti-Bribery Convention

[The OECD Anti-Bribery Convention](#) does not apply directly to private sector organizations, but it is a legally binding international agreement that requires parties to the Convention to establish the bribery of foreign public officials as a criminal offence under their laws and to investigate, prosecute and sanction the offence. It is the only international anti-corruption instrument focused on the supply side of the bribery transaction (i.e. the person or entity offering, promising or giving a bribe). The Convention was signed on 17 December 1997 and entered into force on 15 February 1999. It currently has 44 Signatories – all 38 OECD countries plus Argentina, Brazil, Bulgaria, Peru, Russia, and South Africa. The Convention establishes an open-ended, peer-driven monitoring mechanism carried out by the OECD Working Group on Bribery.

To assist enterprises to prevent and combat corruption, the OECD has developed over 20 legal instruments under the OECD Convention framework. Known as [the OECD Standards](#), the instruments are classified into three categories:

1. Anti-Bribery
2. Public Integrity
3. Responsible Business Conduct

A list of these instruments is given in [Appendix A](#).

Private sector organizations are encouraged to apply the measures outlined in these instruments where they are relevant to their operations.

Relevance to Pacific private sector organizations

Private sector organizations and individuals operating in Pacific Island jurisdictions might be captured by respective anti-bribery and corruption legislation implemented by the country of company registration, or individual citizenship or residence. For example, the anti-bribery and corruption laws of the United States of America, the United Kingdom and Australia apply to companies incorporated in their jurisdictions and to their citizens no matter where in the world they operate.

ISO 37001 Anti-Bribery Management Systems

[ISO 37001 Anti-bribery management systems](#) sets another international standard for public and private sector organizations. As the standard must be purchased, only an outline of its features is provided.

Key features of ISO 37001 include:

- It can be adapted to all types of organizations regardless of size or jurisdiction.
- It can be implemented independently or integrated into existing anti-bribery and corruption systems.
- It specifies mandatory requirements that an organization must implement when establishing or updating anti-bribery and corruption programmes.
- It requires organizations to implement prevention and detection measures proportionate to the bribery risk.
- It requires management to establish a clear anti-bribery and corruption policy and compliance function, which is adequately trained.

Compliance with ISO 37001 requires an organization to implement specified minimum requirements including:

- Assessing the risk of bribery and corruption to the organization.
- Undertaking appropriate due diligence in accordance with the risk faced by the organization.
- Implementing an anti-bribery and corruption policy and programme.
- Communicating anti-bribery and corruption policies and programmes to all relevant staff and business associates including government departments and agencies, state owned enterprises, joint venture partners, contractors and sub-contractors, suppliers, and consultants.
- Appointing a compliance manager to oversee the anti-bribery and corruption programme.
- Providing anti-bribery and corruption training to all managers and employees.
- Taking reasonable steps to ensure that controlled organizations (i.e. any other organizations which the organization controls, including joint venture arrangements) and business associates have implemented appropriate anti-bribery controls.
- Verifying that managers and employees comply with the anti-bribery policy.
- Controlling gifts, hospitality, donations, and similar benefits to ensure that they are not involved in corruption.

- Implementing bribery reporting procedures (whistleblowing).
- Investigating any actual or suspected bribery.
- Monitoring, reviewing, and where necessary changing or enhancing the effectiveness of the anti-bribery and corruption programme.

The seven core elements of an ISO 37001 compliant anti-bribery compliance programme are:

1. **Context** – This includes understanding the organization and the needs and expectations of stakeholders, establishing, documenting, implementing, maintaining and continually reviewing strategies and systems, and undertaking regular risk assessments.
2. **Leadership** – This includes clarifying the roles and responsibilities of top management to demonstrate leadership and commitment, establishing, maintaining and reviewing an anti-bribery policy, and assigning an anti-bribery compliance function.
3. **Planning** – The organization must consider the bribery risks it faces, explore opportunities for improvement, and provide reasonable assurance that the anti-bribery management system can achieve its objectives. The effectiveness of the anti-bribery management system must be monitored and continual improvements made.
4. **Support** – This includes determining and providing the resources needed to establish, implement, maintain and continually improve the anti-bribery management system. Staff competence needs to be assessed and employment conditions established that require personnel to comply with the programme, give the organization the right to discipline personnel in the event of non-compliance, and provide adequate and appropriate anti-bribery awareness and training to personnel.
5. **Operation** – This includes implementing, reviewing and controlling anti-bribery management system processes. It involves implementing financial and non-financial controls that manage bribery risk, and implementing procedures to prevent the offering, provision or acceptance of gifts, hospitality, donations and similar benefits. Reporting of suspected and actual bribery must be encouraged and enabled, as well as any violations of or weakness in the anti-bribery management system.
6. **Evaluation** – This includes determining what needs to be monitored and measured, who is responsible, and how and when it, along with subsequent analysis and evaluation, will be accomplished, audited and reviewed.

7. **Improvement** – This involves work to continually improve the suitability, adequacy and effectiveness of the anti-bribery management system. It includes identifying nonconformity and reacting promptly to control and correct it, deal with the consequences, and evaluate the need for action to ensure it does not recur or occur elsewhere.

ISO 37001 has an Annex which contains guidance to help an organization implement the anti-bribery programme.

Relevance to Pacific private sector organizations

[ISO 37001](#) is the international standard for combating bribery and corruption, and private sector firms operating in the Pacific are encouraged to obtain ISO 37001 certification. Compliance does not guarantee that an organization will not be caught up in bribery, but compliance helps demonstrate, when required, that the organization has implemented reasonable and proportionate measures designed to prevent bribery. This is essential for any organization captured by the UK Bribery Act, but it is also important for any organization involved in a corruption incident. Compliance also hardens organizations against corruption, enhances overall internal governance, and provides increased reputational value.

Obtaining certification can be prohibitively expensive for small and medium-sized enterprises (SMEs). In that case, two options exist:

1. Implement the ISO 37001 framework but not acquire certification.
2. Undertake the Transparency International Self-Evaluation process using the Self-Evaluation Tool (SET), as discussed in the next section.

— UK's national framework: case in point

Most countries have laws prohibiting bribery and corruption. Some, especially OECD countries, have laws that criminalize acts of bribery and corruption carried out by their companies, citizens or residents anywhere in the world, as mentioned above. The United Kingdom's Bribery Act 2010 is considered to set a high standard.

UK Bribery Act 2010

Key features of [the UK Bribery Act](#) include:

- It applies to acts of bribery occurring in the UK and involving foreign officials.
- It creates an offence for a commercial organization to fail to prevent bribery.
- A commercial organization can be liable if a person 'associated' with it bribes another person intending to obtain or retain business or a business advantage for the organization. A person 'associated' with a commercial organization is defined as a person who 'performs services' for or on behalf of the organization. This person can be an individual or an incorporated or unincorporated body. This broad definition means that contractors could be 'associated' persons if they are performing services for or on behalf the organization. A supplier may also be an 'associated' person if it is performing services for the organization rather than simply acting as a supplier of goods.
- The Act provides a defence if an organization can prove that despite a particular case of bribery, it had adequate procedures in place to prevent persons

associated with it from committing bribery. The question of whether an organization had adequate procedures in place is a matter for a court to consider the particular facts and circumstances of the case, including matters such as the level of control over the activities of the associated person and the degree of risk that required mitigation.

- UK courts have jurisdiction over offences committed in the UK, and for offences committed outside the UK where the person committing them has a close connection with the UK by virtue of being a British national or ordinarily resident in the UK, a body incorporated in the UK, or a Scottish partnership.
- Bribery prevention procedures should be proportionate to risk. A commercial organization's procedures to prevent bribery by persons associated with it should be proportionate to the risks it faces and to the nature, scale, and complexity of the organization's activities.
- Hospitality is not prohibited by the Act but facilitation payments, aimed at inducing officials to perform routine functions they are otherwise obligated to perform, are.

The procedures put in place by commercial organizations wishing to prevent bribery being committed on their behalf is informed by six principles:

1. **Proportionate procedures** – Procedures should be proportionate to the risks in terms of the nature, scale and complexity of the business. The size of the organization is considered, for example, but this is not determinative as smaller businesses can face very serious corruption risks. In order to properly determine the level of corruption risk, organizations should undertake a risk assessment, as mentioned below. The procedures subsequently put in place should be designed to mitigate the risks identified in the risk assessment.
2. **Top-level commitment** – The successful implementation of an anti-corruption approach within an organization relies on top level commitment to fostering a culture of zero tolerance which should be communicated throughout the organization.
3. **Risk assessment** – Organizations should carry out a risk assessment that considers the specific business, culture, nature, scale and geography of activities. The assessment should consider both internal and external risks, and internal and external information sources. It should be properly documented and be endorsed at the most senior levels.
4. **Due diligence** – Organizations must mitigate the risk of bribery being undertaken by persons acting for on behalf of the business. Due diligence should be based on the risks identified and be proportionate to those risks.
5. **Communication and training** – All anti-corruption procedures and policies must be communicated throughout the organization and must include relevant training. This sets the tone and mitigates the risk of internal

corruption by communicating expectations and rules for all staff.

6. **Monitoring and review** – Organizations should continually monitor and review their anti-corruption policies and procedures to ensure that they remain up to date and relevant to the evolving nature of the business and the global corruption landscape.

Relevance to Pacific private sector organizations

[The UK Bribery Act](#) sets a high anti-bribery and corruption standard for all private sector organizations regardless of where they are registered or operate. The most important aspect of the legislation is that organizations should implement adequate procedures to prevent bribery, with those procedures being based on a thorough and appropriate risk assessment across the organization. The policies and procedures subsequently implemented should be proportionate to the risks faced by the organization and a policy or a procedure not based on a sound risk-based approach could leave a private organization vulnerable. No policy or procedure can detect and prevent all corruption, but a risk-based approach will focus efforts where they are most needed and will have most impact. A risk-based approach recognizes that the threat to organizations varies across jurisdictions, business sectors, business partners and transactions.

— — **Anti-bribery and corruption policies and procedures**

The preceding sections have outlined the international standards and legal frameworks that private sector organizations must be aware of and should consider complying with, regardless of their jurisdiction of registration and operation. International standards apply where a Pacific jurisdiction has adopted them, and clearly a private sector organization operating in a Pacific jurisdiction must comply with local anti-bribery laws. But where those laws do not match or exceed the legal or international governance standards referred to above, it would be a responsible decision for any private sector organization to align their policies and procedures with international standards.

The reference material outlined below is designed to assist a private sector organization operating in a Pacific jurisdiction to meet or exceed international legal and governance standards. By referring to these documents, a private organization operating in a Pacific jurisdiction should be able to:

- Develop managers and leaders who set the right tone at the top and lead by example.
- Conduct an anti-bribery and corruption risk assessment.
- Develop an anti-bribery and corruption compliance programme.
- Develop anti-bribery and corruption policies and procedures.
- Train all managers and staff in compliance with anti-bribery and corruption measures.

- Monitor all systems and staff for effectiveness and performance.
- Undertake changes to the compliance system when required.

Reference material

[The Moral Compass of Companies: Business Ethics and Corporate Governance as Anti-Corruption Tools](#)

This paper is published by the International Finance Corporation and targets private sector stakeholders who want to reduce their risk and vulnerability to corruption. It explores and outlines the important role that sound corporate governance plays in combating corruption and stresses the importance of all stakeholders including investors, shareholders, regulators and media organizations. The paper discusses the meaning of corruption and its causes and provides useful practical information on building an ethical organizational culture resistant to corruption.

[Business Principles for Countering Bribery](#)

Transparency International's Business Principles have had significant influence on the development of corporate anti-bribery practice. They are used as a reference by legislators and other similar codes including UK Ministry of Justice Guidance to the UK Bribery Act, the Global Reporting Initiative Sustainability Reporting Framework, the UN Global Compact Reporting Guidance on the 10th Principle against Corruption, and the Partnering Against Corruption Initiative and its Principles for Countering Bribery.

[Business Principles for Countering Bribery Transparency International Self-Evaluation Tool](#)

Transparency International's Self-Evaluation Tool (SET) has been developed by for use by private sector firms to self-evaluate their anti-bribery programmes. It aims to enable private sector firms to assess the strength, completeness and effectiveness of their policies and procedures against the framework of the Business Principles for Countering Bribery.

SET provides an in-depth checklist aligned to the Business Principles for Countering Bribery. It assists companies to:

1. Identify strengths and areas for improvement.
2. Stimulate approaches and thinking related to anti-bribery.
3. Provide content for reporting to management, the board, audit or governance committees on the completeness, effectiveness and reliability of the anti-bribery programme.
4. Provide a basis for internal audit or external independent verification.

SET can be applied to the whole of the company's worldwide activities, including subsidiaries and branches, for example, or limited to one country, region, subsidiary or business unit.

Anti-Corruption Ethics and Compliance Handbook for Business

The Handbook was developed in 2013 by OECD, UNODC and World Bank to serve as an authoritative reference and practical tool for private sector firms seeking to undertake an anti-bribery risk assessment and develop and implement an anti-corruption ethics and compliance programme.

APEC Anti-Corruption Code of Conduct for Business, September 2007

This publication by Asia-Pacific Economic Cooperation (APEC) highlights four key business integrity and transparency principles for the private sector including:

1. Prohibition of Bribery
2. Programme to Counter Bribery
3. Scope and Guidelines
4. Programme Implementation Requirements.

Module 5 Private Sector Corruption

The UNODC Global Resource for Anti-Corruption Education & Youth Empowerment (GRACE) Module Series on anti-corruption offers 14 modules focused on core anti-corruption issues. They are designed for use by academic institutions and professional academies across the world, but the training exercises and references are valuable for any private sector firm.

— Partnering with other organizations

UN Global Compact

Even very large organizations can struggle to implement effective anti-bribery frameworks, and the costs of preventing corruption can be prohibitive for some smaller organizations. However, an organization can reduce anti-bribery and corruption costs by forming relationships with other organizations, especially those in the same or similar lines of business, or joining an anti-corruption association or collective. Anti-corruption collectives fall within the framework of [the 10th Principle of the UN Global Compact](#) which requires businesses to work against corruption in all its forms, including extortion and bribery. [The 10th Principle](#) was adopted in 2004 and commits UN Global Compact participants not only to avoid bribery, extortion and other forms of corruption, but also to proactively develop policies and concrete programmes to address corruption internally and within their supply chains. It also encourages companies to work together and with civil society, the UN, and governments to realize a more transparent global economy.

According to the UN Global Compact website, [anti-corruption collective action](#) allows companies to:

- Create deeper understanding of corruption issues.
- Consolidate knowledge and financial and technical resources to achieve greater impact.
- Create more credible, acceptable and sustainable solutions.
- Help ensure fair competition and a level playing field for all stakeholders.
- Create a more stable and enabling business environment.
- Complement existing anti-corruption efforts in vulnerable regions and sectors, where industry or government-led regulations are weak.

Forms of collective action include integrity pacts, anti-corruption declarations, business coalition certifications, principle-based initiatives, and education and training.

Anti-corruption collective action projects are also aligned with [Global Compact Local Networks \(GCLNs\)](#) where they exist. The aim of GCLNs is to increase business integrity, enhance transparency and bring the private sector, governments and civil society together to collectively advance the anti-corruption agenda and contribute to the achievement of the SDGs, specifically SDG 16 and target 16.5 on fighting corruption. Joining, or encouraging the formation of, a GCLN has many advantages for private sector firms seeking to reduce the costs of combatting corruption.

To assist private sector firms wanting to join an anti-corruption collective, several manuals have been produced by the UN Global Compact including:

1. [Uniting against Corruption: A Playbook on Anti-Corruption Collective Action \(2021\)](#)
2. [A Practical Guide for Collective Action Against Corruption \(2015\)](#).

A private sector collective in Thailand

Thailand's [Private Sector Collective Action Against Corruption \(CAC\)](#) provides a good example of collective action in the private sector aimed at mitigating supply side corruption risks. Initiated in 2010, it is led by eight organizations: the Thai Chamber of Commerce, the Joint Foreign Chambers of Commerce in Thailand, the Thai Listed Companies Association, the Federation of Thai Industries, the Federation of Thai Capital Market Organizations, the Thai Bankers' Association, the Tourism Council of Thailand, and the Thai Institute of Directors Association, with The Thai Institute of Directors Association serving as the secretariat. The initiative aims to reduce the cost of implementing practical and effective anti-bribery measures.

Any company can apply to join CAC, but do not become members until they have been certified. This involves large companies completing a 71-point checklist and SMEs a 17-point checklist and providing supporting evidence within 18 months of applying ([Process Overview](#)). The checklist is based upon a modified [Self-Evaluation Tool for Countering Bribery \(SET\)](#). Certification only acknowledges that the company has met CAC anti-corruption standards and does not certify the behaviour of individuals in the company ([CAC Principles](#)). The CAC is viewed as an alternative to the ISO 37001 certification process. SMEs operating in Pacific jurisdictions wishing to implement a lower cost anti-bribery system should consider Thailand's CAC as a model.

— Other anti-corruption guides and tools

UNDP, in partnership with international, regional and national partners, published various knowledge products on corruption relevant to the private sector including:

The Pacific region

- [UNDP and UNODC \(2022\). Information Note: Breaking the Silence on Gender and Corruption in the Pacific.](#)
- [UNDP and UNODC \(2021\). Anti-corruption Toolkit for Palau's Women Entrepreneurs.](#)
- [UNDP and UNODC \(2020\). Anti-corruption toolkit for women-owned micro, small and medium businesses in Fiji.](#)
- These were published in Samoan language: Samoa Chamber of Commerce, UNDP and UNODC (2022). Toolkit on Anti-Corruption for Women-Owned Businesses in Samoan; and (2021). Business Integrity Toolkit for Young Entrepreneurs.

Global and other regions

- [UNDP \(2023\). Promoting Women Entrepreneurs as Driver of Business Integrity: A Practical Approach.](#)
- [UNDP \(2022\). UNDP Strategic Programming for Anti-Corruption Agencies: Regional Guidance Note for ASEAN.](#)
- [UNDP \(2021\). Corruption and Contemporary Forms of Slavery: Examining Relationships and Addressing Policy Gaps.](#)

- [UNDP \(2021\). Gender Specific Corruption Risk and Vulnerabilities.](#)
- [UNDP and UNODC \(2021\). Holistic Integrity Frameworks to Address Corruption.](#)
- [UNDP, FairBiz and Youth Co:Lab \(2020\). Business Integrity Toolkit for Young Entrepreneurs.](#)

A range of other material is available for private sector businesses including:

- [Australian Trade Commission \(2018\). Anti-Bribery & Corruption \(ABC\) Due Diligence in 12 steps.](#)
- [Transparency International UK \(2016\). Managing Third Party Risk: Only as strong as your weakest link.](#)
- [G20 and B20 \(2015\). Anti-Corruption Toolkit for Small and Medium Sized Companies.](#)
- [Center for International Private Enterprise \(2014\). Anti-Corruption Compliance: A Guide to Mid-Sized Companies in Emerging Markets.](#)
- [Center for International Private Enterprise \(CIPE\) and the U.S. Agency for International Development \(USAID\) \(2007\). Business Without Corruption: An Action Guide.](#)

— Appendix A - OECD Standards

Anti-Bribery

- [Anti-Bribery Convention](#)
- [Recommendation for Further Combating Bribery of Foreign Public Officials in International Business Transactions](#)
- [Tax Measures for Further Combating Bribery of Foreign Public Officials in International Business Transactions](#)
- [Recommendation for Development Co-operation Actors on Managing the Risk of Corruption](#)
- [Recommendation on Bribery and Officially Supported Export Credits](#)

Public Integrity

- [Recommendation on Public Integrity](#)
- [Recommendation on Public Procurement](#)
- [Recommendation on Improving the Environmental Performance of Public Procurement](#)
- [Recommendation on Fighting Bid Rigging in Public Procurement](#)
- [Recommendation on the Governance of Infrastructure](#)
- [Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises](#)
- [Principles for Transparency and Integrity in Lobbying](#)

Responsible Business Conduct

- [Declaration on International Investment and Multinational Enterprises](#)
- [MNE Guidelines \(OECD Guidelines for Multinational Enterprises\)](#)
- [Due Diligence Guidance for Responsible Business Conduct](#)
- [Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector](#)
- [Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#)
- [Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)
- [OECD-FAO Guidance for Responsible Agricultural Supply Chains](#)
- [Declaration on Propriety, Integrity and Transparency in the Conduct of International Business and Finance](#)
- [Recommendation concerning Effective Action against Hard Core Cartels](#)



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