

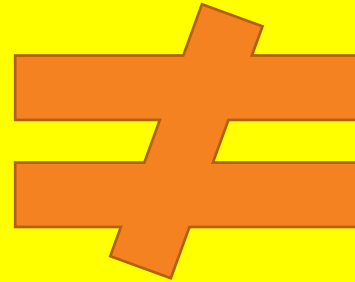
Implementation of Anti-Bribery Management Systems (ABMS): Benefits and Challenges in State Owned Enterprises.

Trends in preventing corporate corruption

Gemma Aiolfi 30 August 2022

ABMS Yes! SMAP = starting point

Achieving ISO 37001 certification is a good start but



Implementation of ABMS in BUMN

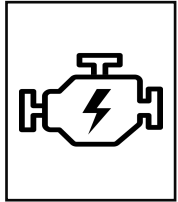
What does ABMS implementation mean?

The Board allocates resources for compliance and actively communicates its support and oversight role for the ABMS development and implementation...



- Training needs to be repeated, adapted according to the audience.
- Employees should be encouraged to contribute to the development of policies, procedures, ethical values and standards.

Trends in preventing corporate corruption



The Compliance Function as the engine of **culture change**

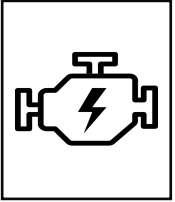


Using the Anti-bribery Management System in relation to **new issues** such as ESG topics (human rights, environment, CSR)



What is an **effective Anti-Bribery Management System**? How do you know whether the ABMS is making a difference? Can it be proved?

Translating trends into action in your SOE



Culture Change - Where to start and how to make it tangible

1. Externally = Disclosure & Transparency



Translating trends into action in your SOE

Culture Change - Where to start and how to make it tangible

2. Internally = Communicate with the workforce

- Set priorities on ABMS,
- Risk Assessment,
- Code of Ethics & Business Conduct
- Speak-up/whistleblowing channels and follow-up process

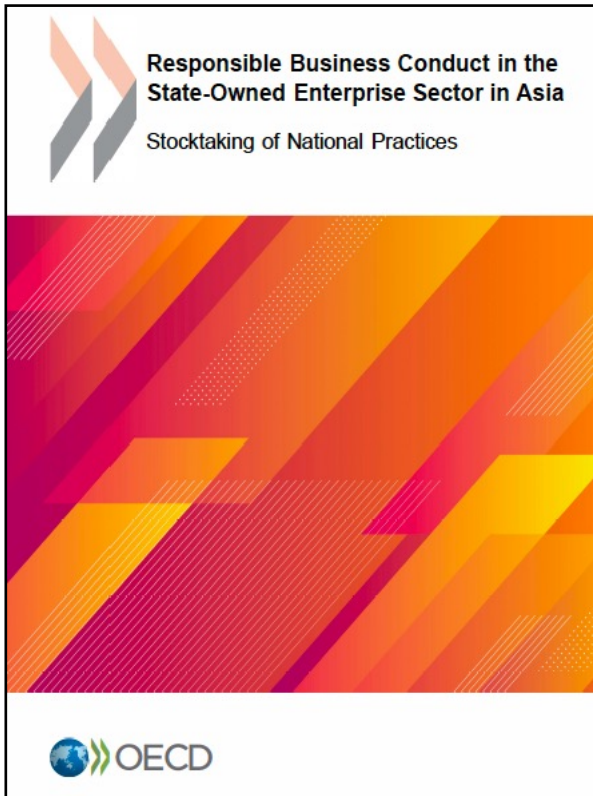
Translating trends into action in your SOE



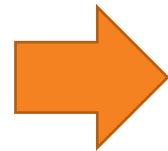
ABMS and ESG topics: Expanding horizons

1. Leveraging existing risk assessments, tools and measures
2. Working across the organization - reduce silos and share information including to and from subsidiaries
3. Synergies, efficiencies and coherent approaches

e.g. ABMS and Responsible Business Conduct



SOE boards should develop, implement, monitor and communicate internal controls, ethics and compliance programmes or measures, including those which contribute to preventing fraud and corruption.



Communication, disclosure and transparency...

www.oecd.org/corporate/responsible-business-conduct-in-the-SOE-sector-in-Asia.pdf.

Translating trends into action in your SOE



What is an effective ABMS? Is it making a difference?

1. Asking employees (surveys), measuring (how and what), monitoring, root cause analyses (use the data from hotline reports and investigations, internal audit reports)
2. Actively review and update risks and mitigation measures
3. Collaborate with other SOEs to identify indicators of effectiveness.

Q& A

- Thank you!