



**Asia-Pacific
Economic Cooperation**


2019/SOM3/ACT/NET/WKSP/020

Compliance Programs for Small and Mid-Sized Companies and Family-Owned Businesses

Submitted by: Hui Chen Ethics



**Workshop for Law Enforcement Agencies on
Effectively Using Corporate Compliance Programs
to Combat Domestic and Foreign Bribery
Puerto Varas, Chile
18-19 August 2019**



Compliance programs for
Small/Mid-Sized Companies
& Family-owned Businesses

HUI CHEN
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Understand Your
Risks



Focus on What
Works



Don't let vendors
scare you

Know Your Risks

MOTIVE



Employees



Third Parties

OPPORTUNITY



Transactions



Control points



Gate-keepers

Policy: Area Closed...No Trespassing

3

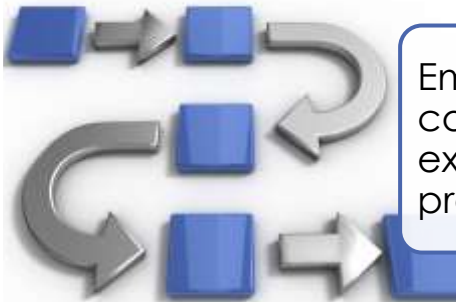


Policy: Area Closed...No Trespassing



Focus on what WORKS

Processes



Embed
controls in
existing
processes

People



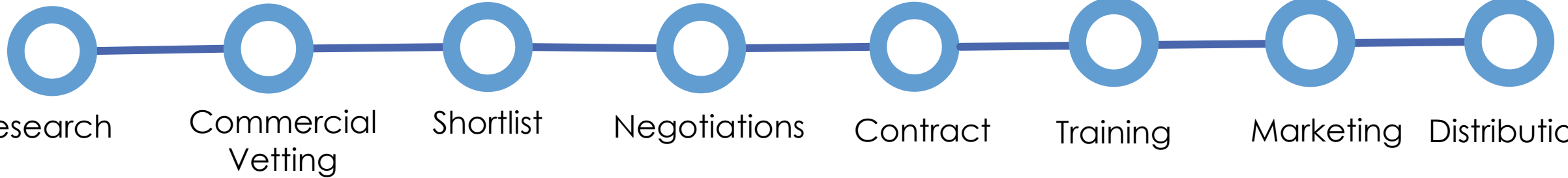
Influence
behavior

Systems

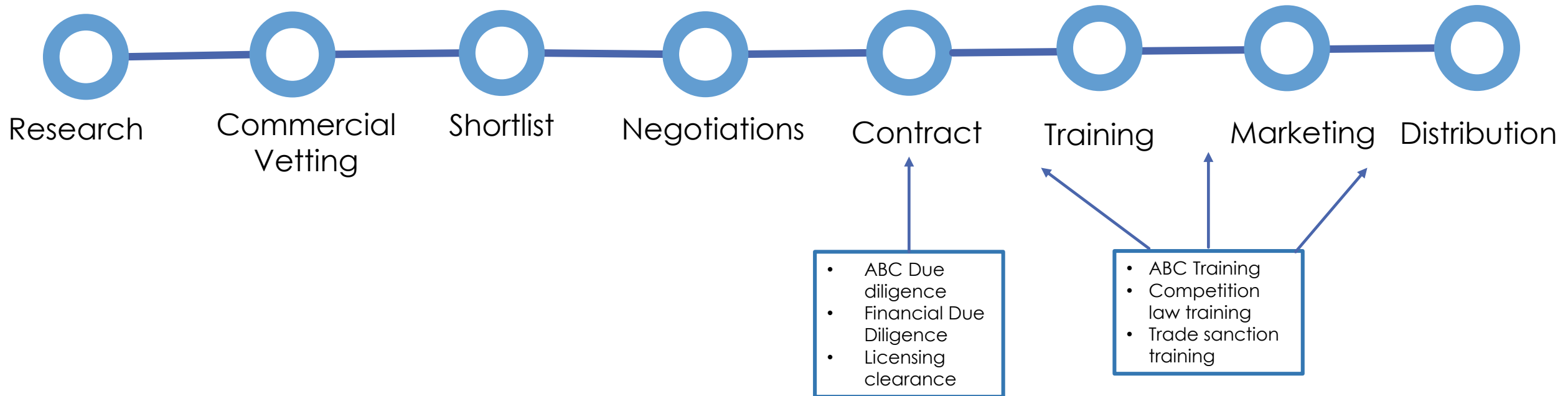


Checks &
balance

Signing up a new distributor



Typical compliance involvement



 **Is the product to be distributed...**

- Regulated in the target markets?
- Likely to be sold to governments or government-owned companies?
- Going to be moved across borders?



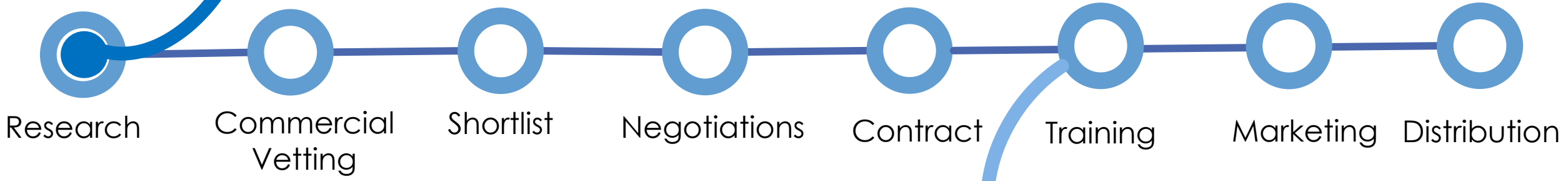
Regulatory



Bribery



Trade



Research

Commercial Vetting

Shortlist

Negotiations

Contract

Training

Marketing

Distribution



Compliance training embedded in product/services training

PEOPLE – Focus on behavior



Policies & Procedures

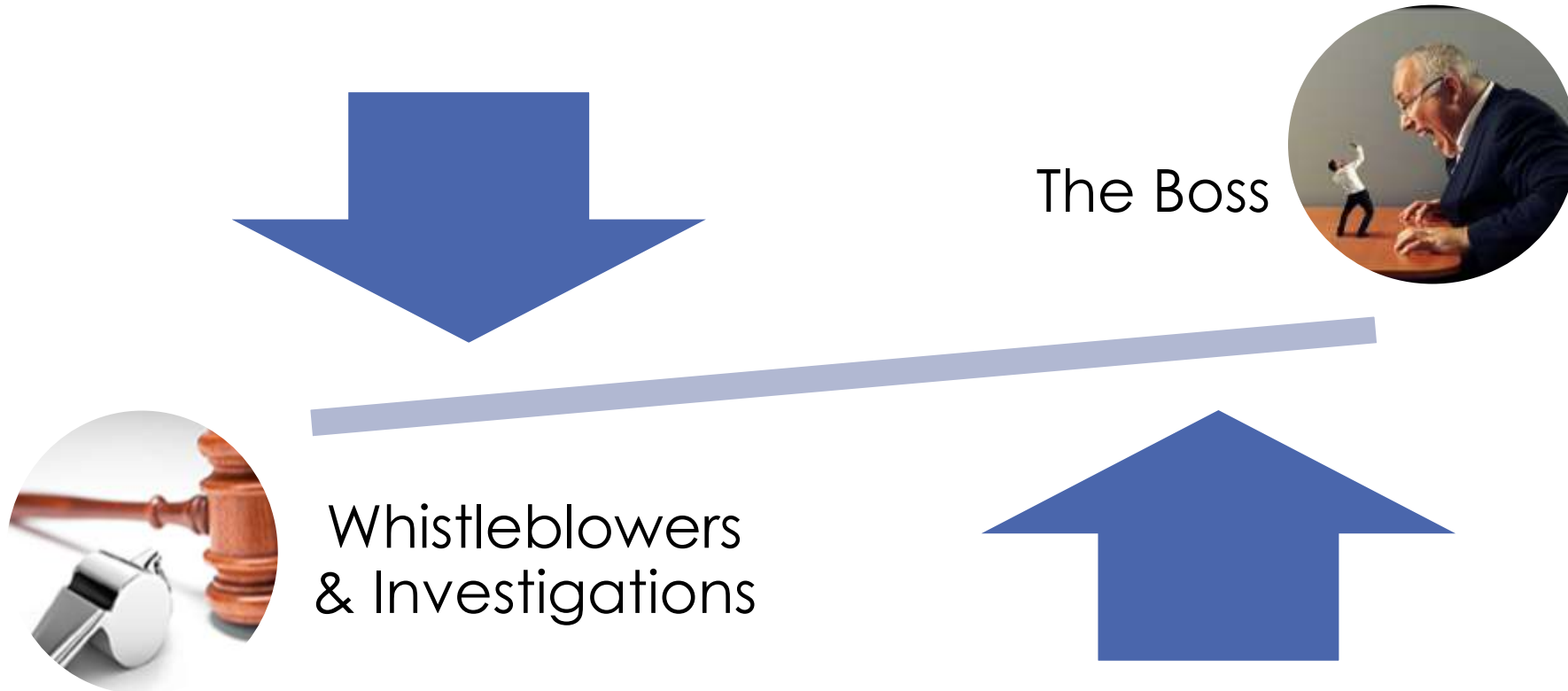


“Tone from the Top”



Training & Communications

Systems: Checks & Balance



Don't let the vendors scare you!



Questions? Comments?

