Bribery & Corruption

A Custom Portfolio of NAVEXEngage Ethics & Compliance Training Courses
# CONTENTS

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>Anti-Bribery &amp; Corruption (Advanced)</td>
<td>2</td>
</tr>
<tr>
<td>Anti-Bribery &amp; Corruption (Basics)</td>
<td>5</td>
</tr>
<tr>
<td>Antitrust &amp; Competition Law (Basics)</td>
<td>7</td>
</tr>
<tr>
<td>Bribery &amp; Corruption: Avoiding the Slippery Slope</td>
<td>10</td>
</tr>
<tr>
<td>Bribery &amp; Corruption: Prevention Is Everyone’s Responsibility</td>
<td>12</td>
</tr>
<tr>
<td>Bribery &amp; Corruption: Third-Party Risks</td>
<td>13</td>
</tr>
<tr>
<td>Code of Conduct: Ethical Role Modeling</td>
<td>14</td>
</tr>
<tr>
<td>Conflicts of Interest: Declining a Gift</td>
<td>15</td>
</tr>
<tr>
<td>Conflicts of Interest: Identifying and Handling a Conflict</td>
<td>16</td>
</tr>
<tr>
<td>Ethics and Code of Conduct</td>
<td>17</td>
</tr>
<tr>
<td>Global Anti-Bribery Basics for Business Partners</td>
<td>18</td>
</tr>
<tr>
<td>Insider Trading</td>
<td>21</td>
</tr>
<tr>
<td>Insider Trading</td>
<td>24</td>
</tr>
</tbody>
</table>
An effective and engaging ethics and compliance training program is a critical component in building and maintaining a culture of ethics, integrity and respect. Training that is relevant and stimulating creates a strong organizational culture while ensuring individual alignment to applicable regulatory and behavioral expectations.

Our approach to employee education is built upon decades of experience in the compliance eLearning space and reflects our commitment to effective training with exceptional return on investment. We pride ourselves on the quality of our training solution and its ability to resonate with learners and meet the unique training needs of your organization.

The 2018 NAVEX Global Training Benchmark Report showed more survey respondents see ethics and compliance training programs as the key element in preventing misconduct and ethical violations more than any other element of an ethics and compliance program. Training and awareness are also seen as essential vehicles through which behavioral and cultural expectations are expressed, addressed and enacted in an organization.

NAVEX Global’s eLearning solution, NAVEXEngage, delivers market-leading ethics and compliance training with highly interactive and regularly refreshed content designed to engage learners and drive understanding and behavioral changes. Our risk-based approach ensures you can deliver training on critical topics to key audiences with both short-form micro learning and full-length courseware, on any device, virtually anywhere and anytime. Your learners expect focused, engaging and topical training that informs yet does not overburden.

NAVEXEngage courseware empowers you to address your most critical ethics and compliance risks. From harassment to cyber security and your code of conduct, we focus on the topics that matter to you. Our courseware is updated on a regular cadence to ensure that customers are training employees on current obligations and risks. For example, our Workplace Harassment course has been updated every 24 months for more than 15 years, enabling many customers to plan their harassment training around our update schedule.

Your Custom Catalog

This catalog, created to address your unique ethics and compliance concerns, is designed to optimize your training program. Whether you select full-length or micro learning content, our training approach is purposely flexible to allow you to train on multiple topics for multiple learners over several years via a custom training plan. Use this catalog, your training calendar and the various course lengths we offer to elevate your training program and ensure your objectives are met.

Talk with us about how to construct the most effective approach to ethics and compliance training, build an optimized calendar and curriculum, and to pursue a risk-based and multi-topic training program for your learners.

https://www.navexglobal.com, info@navexglobal.com, 866 297 0224 / +44 (0) 20 8939 1650.

Training Within Your Ethics & Compliance Program

NAVEX Global offers a platform of ethics and compliance solutions, including incident management, policy and procedure management, ethics and compliance training,
third-party risk management and code of conduct services. These program elements are interlinked through their ability to not only capture ethics and compliance trends, but also to empower organizations to take proactive action to drive change.

Our training solution is changing how organizations approach ethics and compliance training. Developed by experts in the field, vetted by Baker McKenzie, and endorsed by the Society for Human Resources Management (SHRM) and the Association of Corporate Counsel (ACC), NAVEXEngage is the trusted training solution you need for your ethics and compliance program.

NAVEXEngage Is Designed to Be Accessible to Your Learners

Subscription Services

NAVEXEngage courses are designed to fit your ethics and compliance program and training needs. With decades of experience with real customers and their unique needs, we have developed a simple and effective set up approach that allow you to make a course uniquely your own. These include:

- Your logo on every screen within the training
- Integrating your policies in the training, allowing for quick and easy learner access
- Custom certificates of completion
- Integrating your personnel resources and contact information
- Course configuration to match your needs where courses have multiple modules (Workplace Harassment and Ethics & Code of Conduct)
- Mode selection (video, audio, text)

Additional customization available at implementation for a fee.

In Multiple Languages

NAVEXEngage courseware is designed to meet your global language needs. The courses in our library specific to US Domestic law are available in U.S. English, Canadian French, and Latin American Spanish. The remainder of our course library is available at no additional cost in fourteen standard languages. The translation of our courses into additional non-standard languages are available for a nominal fee.

Learning Management Systems

All NAVEX Global full-length courses are designed to be deployed and managed on a learning management system (LMS), an online software tool that allows you manage all of your organization’s users and the courses they view. It also allows you to run reports, and track learner progress and completion. An LMS is an essential tool for documenting and proving compliance and establishing legal defenses. Customers may use our LMS or an alternative SCORM, AICC, or xAPI compatible LMS.

NAVEX Global Partnerships

NAVEX Global is proud to partner with industry-leading organizations that help protect businesses, grow positive corporate cultures and provide key learning opportunities for our customer base. Included below are the organizations with whom we partner and produce our award-winning, legally-vetted content and with whom we have exclusive relationships for our training solutions.

Baker McKenzie is the first truly global law firm. Since their founding in 1949, they have been advising leading multinational and domestic companies on the issues of an integrated global
market. As a community of citizens of 60 nations, Baker McKenzie has a deep understanding and appreciation for the language and culture of business all over the world. This provides a distinctive ability to help clients anticipate and address the nuances of local markets as they pursue their global and regional business objectives with confidence. Baker McKenzie is a trusted partner of NAVEX Global and helps to ensure that our solutions are legally sound.

The Society for Human Resource Management (SHRM) is the world’s largest association devoted to human resource management. Representing more than 250,000 members in over 140 countries, the Society serves the needs of HR professionals and advances the interests of the HR profession. Founded in 1948, SHRM has more than 575 affiliated chapters within the United States and subsidiary offices in China and India. NAVEX Global is the exclusive online ethics and compliance training partner of SHRM.

The Association of Corporate Counsel (ACC) is the world’s largest organization serving the professional and business interests of attorneys who practice in the legal departments of corporations, associations, nonprofits and other private sector organizations around the globe. The ACC is the premier association for 34,000+ in-house counsels in over 85 countries. They are a highly-respected organization whose mission is to provide their members education, networking and practical resources. The ACC exclusively endorses NAVEXEngage™ Ethics and Compliance Training as their training vendor of choice. The ACC selected NAVEX Global in 2016 for both the legal accuracy of our content and the impact of its delivery.
Anti-Bribery & Corruption (Advanced)

Bribery can be devastating to an organization. And it’s anything but simple. The current business and regulatory environment often requires employees to get beyond the basics.

Anti-Bribery and Corruption (Advanced) gives employees even more tools for their anti-bribery toolbelt. In this course, learners will explore facilitation payments and policies on commercial bribery. They’ll also find out what it takes to avoid corruption in high-risk countries. Employees are also encouraged to speak up about violations.

Solid training means being prepared to do the right thing in any situation – even situations that go beyond the basics. Basics version also available.

Learn more about the FCPA and UK Bribery Act.

All Learners

Key concepts covered in this course:

- Organizational policy on bribery
- Consequences of bribery
- Forms of bribery and examples of “improper performance”
- An explanation of the U.S. Foreign Corrupt Practices Act, UK Bribery Act, Brazilian Clean Companies Act and the Singapore Prevention of Corruption Act
- Information on international treaties and conventions
The role of facilitation payments
Organizational policy on facilitation payments
Personal safety payments
The definition of commercial bribery
Examples of commercial bribery
Organizational policy on commercial bribery
Factors that suggest a high risk for corruption
Best practices for avoiding and preventing corruption
Handling gift-giving customs
Raising concerns
Non-retaliation
Review of the critical role employees play
An opportunity to review key policies and certify

ONLINE PREVIEW
Anti-Bribery & Corruption (Basics)

Modern business moves fast, and it’s important to have the competitive advantage. But at what cost? Giving gifts can strengthen business relationships – but when do they cross the line?

Anti-Bribery and Corruption (Basics) provides critical information to employees who may not understand when gifts, entertainment or hospitality cross the line from business to bribe. Employees will learn about appropriate and inappropriate gifts and entertainment, with additional training on government and foreign officials and third parties. They’ll also review the critical role accurate recordkeeping plays in avoiding liability.

There is a place for gifts and entertainment in business. However, bribery is never welcome. Solid training is vital. Advanced version also available.

Learn more about the FCPA and UK Bribery Act.

All Learners

Key concepts covered in this course:

- Organizational policy on bribery
- Consequences of bribery
- Forms of bribery
- An explanation of the U.S. Foreign Corrupt Practices Act, UK Bribery Act, Brazilian Clean Companies Act and the Singapore Prevention of Corruption Act
Information on international treaties and conventions

Who can be a foreign official

Standards that apply to foreign officials

When gifts and entertainment may cross the line

Avoiding even the appearance of influence

Acceptable and unacceptable gifts

Government customers and foreign officials

Accurately recording gifts and entertainment

Who is a third party?

Organizational liability for a third party’s actions

Best practices for due diligence and monitoring

The purpose of good recordkeeping

The importance of integrity

Examples of suspicious activity

Raising concerns

Non-retaliation

Review of the critical role employees play

An opportunity to review key policies and certify
Antitrust & Competition Law (Basics)

Using practical, real-world guidance, this course focuses on how to identify and avoid anti-competitive behaviors. It provides an overview of core antitrust and competition law principles – what they are, why they’re important and, most critically, how to comply with them. Employees will have the information they need to help minimize legal and reputational risk. Advanced version also available.

All Learners

Key concepts covered in this course:

- The benefits of competition and a thriving marketplace
- Examples of anti-competitive behavior
- The definition of an improper agreement
- Price fixing, bid rigging, dividing of markets and group boycotts
- Situations (such as trade shows and industry events) that present high risk for anti-competitive behavior
- Spotting anti-competitive practices in a competitive bidding process
- Best practices for avoiding and preventing anti-competitive activity
- Ways to promote free and open competition
- Recognizing and reporting anti-competitive activity
Bribery & Corruption: Avoiding the Slippery Slope

Did you agree to a bribe – or is it just a friendly gesture? How do you know, and what do you do now? This micro learning course navigates bribery and corruption that can happen when employees aren’t aware of key policies and laws. It offers practical advice on points to consider before ever promising or accepting favors, gifts or entertainment in the course of business.

Learn more about the FCPA and UK Bribery Act.

COURSE LENGTH
< 10 min

COURSE TYPE:
Micro Learning Course

COURSE CATEGORIES
Compliance Training

AUDIENCE
All Learners

TOPIC
Anti-Bribery and Corruption

FORMAT
Rich Media

ONLINE PREVIEW
Bribery & Corruption: Prevention Is Everyone’s Responsibility

Corruption puts individuals, communities and organizations at serious risk, and it can happen in any workplace, in any country, to any person. This micro learning course emphasizes a zero-tolerance approach to corruption and the expectation for all employees to report it – regardless of job title.

Learn more about the FCPA and UK Bribery Act.

ONLINE PREVIEW
Bribery & Corruption: Third-Party Risks

Third parties can help organizations succeed, but they must be held to the same standards as the organizations they work with. Designed for employees who may have more interactions with these third parties, this micro learning course explores the key concepts of thorough vetting, identifying warning signs and reporting concerns.

Learn more about the FCPA and UK Bribery Act.
Code of Conduct: Ethical Role Modeling

Managers have unique responsibilities for helping to create, shape and uphold an ethical work culture. This micro learning course explores how they can do that, examining topics like establishing high standards and role modeling, considering consequences and understanding obligations.

ONLINE PREVIEW
Conflicts of Interest: Declining a Gift

Managers are often aware of their organization’s gift policies, but they don’t always know how to accept or decline a gift in the moment. This micro learning course can help, by first explaining when to accept or decline a gift, and then offering practical guidance on the proper ways to do both.
Conflicts of Interest: Identifying and Handling a Conflict

Could you have a conflict of interest? How can you find out? And what should you do next? This micro learning course addresses these important questions by first helping learners to identify what conflicts of interest can look like, providing them with questions they can ask themselves to determine if one exists and steps they can take if they find that they have one.

ONLINE PREVIEW
https://www.navexglobal.com/en-gb/products/online-ethics-compliance-training/learning-courses/conflicts-interest-identifying-and
Ethics and Code of Conduct

When employees are aligned around a core set of values and understand how they can promote a culture of ethics and compliance, organizations succeed. And the best way to ensure they do the right thing? Provide all your employees with engaging, high-quality Code of Conduct training.

The NAVEXEngage Ethics & Code of Conduct course is a critical tool for organizations serious about cultivating and maintaining an ethical workplace. Composed of 16 topical 5-minute modules, customers can construct a course unique to their own concerns. Whereas customers can use any modules they need, most select specific modules to build a 30 to 60 minute course. Leveraging clear instruction, current video scenarios, state-of-the-art animation, engaging interactions and more, this course is a must for any organization looking to train beyond rule-giving to a true Code of Conduct training experience.

Download the Ethics & Code of Conduct Course Overview datasheet here ›

All Learners

Key Concepts Covered In This Course:

The introduction and closing modules of this course bookend the topic-specific content modules clients can select to build their course. Choose the modules you require for your organization.

- The importance of integrity
- Supporting the Code and values through action
- Manager obligations and responsibilities
- Non-retaliation policy
The definitions of a bribe
Best practices for working with third parties
Improper agreements
The importance of free and open competition
Types of confidential information
Protecting intellectual property
Guidance for disclosing perceived, potential or actual conflicts
The importance of speaking up to stop discrimination
Key fraud-prevention techniques
Best practices for documenting and reporting gifts, entertainment and hospitality
Discussion of sexual harassment
Examples of bullying and mobbing
Best practices for avoiding conflicts between political pursuits and organizational interests
Best practices for proper asset storage
Rules for responding to the media and general public
Due diligence procedures for third parties
Examples of workplace violence
The importance of speaking up
Global Anti-Bribery Basics for Business Partners

Modern business moves fast, and it’s important to have the competitive advantage. But at what cost? Giving gifts can strengthen business relationships – but when do they cross the line? Business partners represent the organizations they work with and it’s important to have the answers to these questions.

Our Global Anti-Bribery Basics for Business Partners course provides critical information to business partners to ensure they understand when gifts, entertainment or hospitality cross the line from business to bribe. Learners will explore appropriate and inappropriate gifts and entertainment, with additional training on government and foreign officials and the important obligations of business partners. They’ll also review the critical role accurate recordkeeping plays in avoiding liability.

There is a place for gifts and entertainment in business. However, bribery is never welcome. And the actions of business partners can impact the reputations and legal liability of the organizations they work with. Solid training is vital.

Learn more about the FCPA and UK Bribery Act.

All Learners

Key Concepts Covered In This Course:

- Organizational policy on bribery
- Consequences of bribery
- Forms of bribery and examples of “improper performance”
The shared responsibility of organizations – and their business partners – to combat bribery

Who can be considered a foreign official

The stricter standards that apply when working with foreign officials

The importance of referencing organizational policies and obtaining approvals as needed

When gifts and entertainment may cross the line

Avoiding even the appearance of influence

Acceptable and unacceptable gifts

Government customers and foreign officials

Accurately recording gifts and entertainment

The importance of knowing, understanding and following policies and the terms of business partner contracts

Best practices for selecting and managing third party relationships

The importance of accurate recordkeeping

Raising concerns

Non-retaliation

Review of the critical role employees play

An opportunity to review key policies and certify
Insider Trading

Insider trading isn’t just a risk for major company stockholders. Any employee, at any level of the business, is at risk for violating insider trading laws and policies.

The Insider Trading course provides employees with critical guidance and best practices to avoid violations. Employees will learn the definition of “inside information” and are encouraged to ask critical questions to help them spot risks and prevent violations – even inadvertent ones. Employees will also receive a checklist of best practices that can help both them, and the organization, avoid serious consequences.

Whether done on purpose or by accident, insider trading can put individuals and companies at serious risk. Comprehensive training can help lower that risk – keeping trades ethical and legal.

All Learners

Key concepts covered in this course:

- Overview of inside (material, nonpublic) information
- Who can commit insider trading
- Best practices for maintaining confidentiality Definition and examples of inside information
- Definition and examples of inside information
- Keeping inside information confidential
- Roles that could increase risk of exposure to inside information
Critical steps managers and employees can take to avoid insider trading

Five key ways to avoid insider trading

Consequences of insider trading

Raising concerns

Non-retaliation

Review of the critical role employees play

An opportunity to review key policies and certify

ONLINE PREVIEW