



Anti-Bribery | Anti-Corruption Centre of Excellence

Building Strong Global Compliance Frameworks
Safeguarding Organizations from Third-Party Risks



RISK MANAGEMENT ASSESSMENT & INVESTIGATIONS | ISO 37001:2016 CERTIFICATION
DUE DILIGENCE 360™ | 3PRM CERTIFICATION & STRATEGIES

Often tolerated in many countries as a “necessary part of getting business done or circumventing bureaucratic red tape,” systematic bribery vastly affects economic growth, undermines trust and discourages investment. Further, studies show that worldwide bribery and corruption directly contributes to global poverty, social inequality and a decrease in development of public infrastructure.

According to Transparency International, which investigates business corruption across the globe, bribery and corruption were among the key components that led to the recent global economic crisis. From lapses in corporate due diligence and devolving government and corporate integrity, to poor transparency, lack of accountability and inadequate corporate integrity systems, business corruption has become both rampant and commonplace on a global level.

Such corporate corruption — and its subsequent effects on development around the world — has furthered the public’s demand for organizations to behave responsibly. But bribery and corruption are often moving targets and very difficult to identify, isolate and remedy.

That's where CRI Group can help.



Introducing the CRI Group Anti-Bribery | Anti-Corruption (ABAC) Centre of Excellence

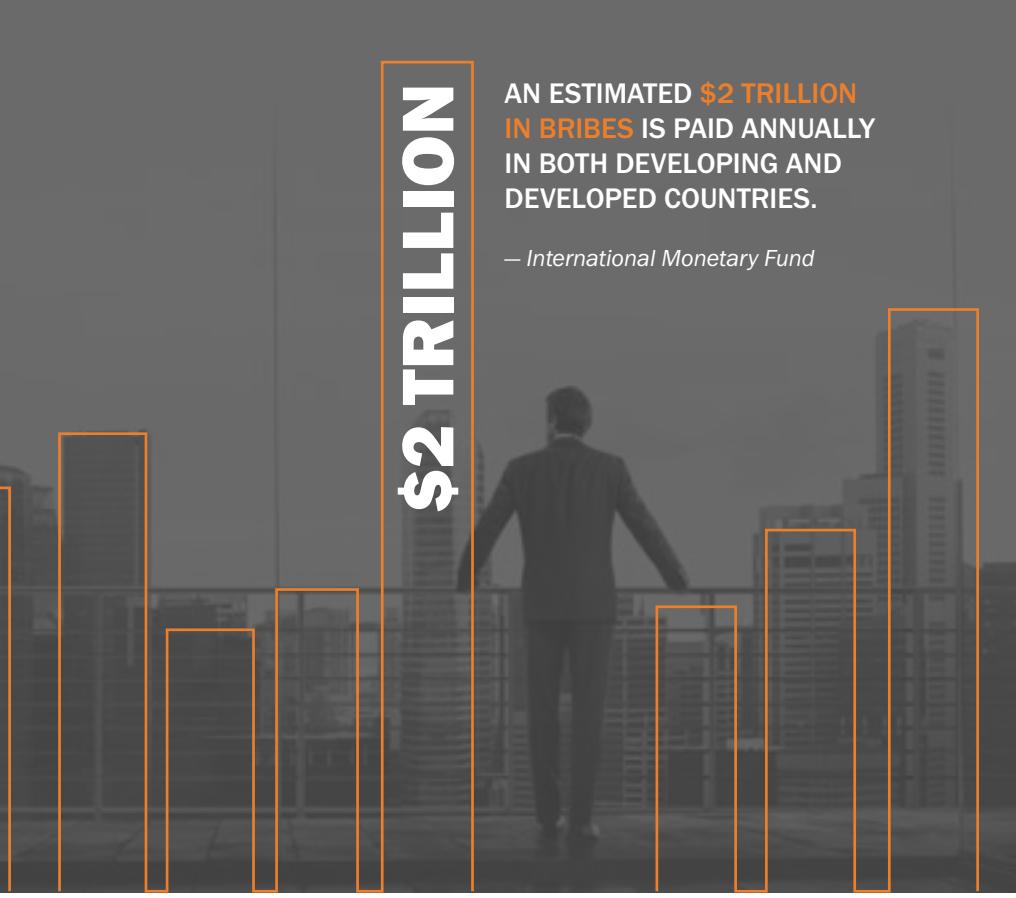
RISK MANAGEMENT ASSESSMENT & INVESTIGATIONS

3PRM CERTIFICATION & STRATEGIES

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DUE DILIGENCE 360™





\$2 TRILLION

**AN ESTIMATED \$2 TRILLION
IN BRIBES IS PAID ANNUALLY
IN BOTH DEVELOPING AND
DEVELOPED COUNTRIES.**

— International Monetary Fund

Engaging in corrupt practices creates an unfavorable business environment that:

- Encourages unfair advantage and anti-competitive practices
- Allows organized crime to flourish
- Creates obstacles to economic development
- Erodes trust in public institutions and business organizations
- Challenges democratic principles

CRI Group's Anti-Bribery Anti-Corruption (ABAC) Centre of Excellence was created to educate, equip and support the world's leading business organizations with the latest in best-practice due diligence processes and procedures. We provide world class risk management assessment and investigation services to organizations seeking to validate or expand their existing compliance frameworks to maintain a competitive edge in the world marketplace.

The ABAC Centre of Excellence offers a complete suite of world-class services and solutions designed to help organizations mitigate the internal and external risks associated with operating in multi-jurisdiction and multi-cultural environments.

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As the world's governing bodies gravitate to more stringent standards and efforts to prevent corruption, bribery and other unethical business practices, we stand ready to help companies meet and exceed those standards.

— Zafar Anjum, CFE, Group Chief Executive Officer, CRI Group





As recently as 2007, the largest fine under the FCPA was less than \$50 million.
Now the worst offenders pay 10-15 times that amount.

— *The Economist*

Risk Management Assessment & Investigations

CRI Group provides expert audit of your existing risk management system to assess effectiveness and vulnerabilities, while ensuring your organization adequately complies with FCPA regulations, UK Bribery Act laws, Anti-Money Laundering regulations, and other global, regional and local regulations.

These assessments also define the level of business integrity within your organization to ensure that the code of international business conduct is followed properly and conflicts of interest are averted. In doing so, a thorough assessment of your risk management processes can protect the organization from damaging litigation and safeguard your business in the global marketplace.

Program Assessment Process

1

A comprehensive review to affirm initial buy-in of the organization's risk management program beginning with top-level management.

2

A survey of the organization's staff to determine the overall level of understanding of the established corporate procedures to identify corruption and other risks.

3

A review of training programs for personnel.

4

An audit of systems and procedures to ensure processes are up to date.

5

Staging scenarios to gauge effectiveness of program implementation.

6

An audit of all steps required to identify, report and resolve red flag issues.

Our mission for all of our clients is to: **ESTABLISH** ➤ **IMPLEMENT** ➤ **MAINTAIN** ➤ **MONITOR** ➤ **IMPROVE**



27%

of the 3,000 business people surveyed reported that they had lost business due to bribery by competitors.

— Transparency International study

ISO 37001:2016 Certification

The newly established ISO 37001 standard is designed to help global organizations implement an anti-bribery management system. The standard specifies a series of measures required by the organization to prevent, detect and address bribery, and provides guidance relative to that implementation.

CRI Group is fully trained to offer independent ISO 37001:2016 certification to ensure that your organization is in compliance with the standard, which is recognized and practiced in more than 160 countries worldwide. Our auditors and analysts work with your team to develop measures that integrate with your existing management processes and controls, and include:

- Adopting an anti-bribery policy
- Establishing buy-in and leadership from management
- Training personnel in charge of overseeing compliance
- Communicating the policy and program to all personnel and business associates
- Providing bribery and corruption risk assessments
- Conducting due diligence on projects, business associates and other third-party affiliations
- Implementing financial and commercial controls
- Developing reporting and investigation procedures

CRI Group can assist your organization in attaining ISO37001:2016 certification, which will:

- **Ensure that your company is implementing a viable anti-bribery management system** utilizing widely accepted controls and systems.
- **Provide assurance to management, investors, business associates, personnel and other stakeholders** that the organization is actively pursuing internationally recognized and accepted processes to prevent bribery and corruption.
- **Provide acceptable evidence to prosecutors or courts** that the organization has taken reasonable steps to prevent bribery and corruption.

DueDiligence360™

CRI Group's premier integrity due diligence solution

CRI Group's comprehensive due diligence investigations involve a review of all relevant information concerning virtually any business on the planet to ascertain past business dealings, criminal records, executive stability and suspect associations. Our experts, analysts and investigators focus on the industry experience, financial condition, knowledge of applicable laws and regulations, reputation, and scope and effectiveness of operations and controls for all third-party affiliations.

In conducting these investigations, CRI Group goes far beyond the standard "check-the-box" assessment. We provide the industry's most thorough bribery and corruption risk assessment through our exclusive **DueDiligence360** solution which ensures that your organization is protected from internal and outside risks.

CRI Group's **DueDiligence360** solution is the most comprehensive risk management tool available for global organizations that are:

- Performing pre-merger, acquisition or pre-IPO transactions;
- Offering or entering into newly formed international joint ventures;
- Engaging in new banking or business relationships;
- Employing, contracting or retaining a foreign business partner;
- Following regulatory compliance or corporate governance best practices;
- Used as an integral part of a consistent and audit-worthy AML and anti-corruption compliance program.

DueDiligence360 involves rigorous investigative and research of the organization and its principals, providing a comprehensive integrity due diligence assessment and accompanying certification. This independent background investigation of principals, owners, shareholders and corporate directors helps to expose:

- Any red flags and or non-compliant working relationships or transactions with previously undisclosed third parties
- Material misrepresentations or commissions
- Unreported financial issues
- Criminal or regulatory sanctions
- Prior bribe or corruption allegations
- Undisclosed legal, civil, criminal or bankruptcy proceedings
- Politically exposed persons

While **DueDiligence360** involves a broad scope of essential and enhanced investigative services, CRI Group can customize an assessment based on your specific requirements.

THE IMPACT OF NEGATIVE EXPOSURE

- Damaged Corporate Reputations and Brand Devaluation
- Diminished Employee Moral
- Potential Consumer Boycotts
- Negative Investor Perceptions
- Eroding Company or Stock Value
- Possible Legal Action
- Fines and Potential Jail Terms for Directors

DueDiligence360 Packages

	Essential Integrity Due Diligence	Enhanced Integrity Due Diligence
Confirmation of the address and telephone number for the subject in question to determine if the provided address/contacts are correct, commercial and/or residential.	✓	✓
Undertake corporate record research to verify and ascertain current shareholdings/directorships, officeholdings including executive and/or non-executive positions, corporate legal structure and to determine whether they are legitimate, commercial and/or trade observations etc.) on the part of subject in question.	✓	✓
Establish corporate and business affiliations of the subject(s) in question.	✓	✓
Verification of personal information of the principal(s) associated with the subject entity.	✓	✓
Local language/English press and electronic media searches on company and the principal(s) in question to establish derogatory information and publicly arises negative criticism.	✓	✓
Undertake research to determine government affiliations, political positions and relationship to public officials on the part of subject(s) in question.	✓	✓
Undertake research with police and relevant court resources for criminal history record checks on the part of subject(s) in question.	✓	✓
Undertake research with relevant public record resources to ascertain civil litigation, liens, previous judgments, bankruptcy on the subject(s) in question.	✓	✓
Undertake research with regulatory agencies to ascertain any current and/or pending actions/sanctions on the part of subject(s) in question.	✓	✓
Undertake onsite visits and take photographs of the address and locality to establish legitimacy for the address and physical location.	✓	
Verification of previous employments and/or projects completed.	✓	
Verification of business and personal references.	✓	
Verification of academic and professional qualifications.	✓	
Undertake source interviews to establish the reputation of the subject(s) in question including but not limited to previous exposure to have a reputation for bribery, fraud, dishonesty or similar misconduct; establishing whether subject(s) have been investigated, convicted, sanctioned or debarred for bribery or similar criminal conduct and/or any civil wrongdoings. CRI Group local agent will have developed well-established resources for the report which will be included but not limited to a combination of discreet source interviews with neighborhood, local law enforcement and court reporters, previous employees; previous customers and distributors; local chamber of commerce and industry resources; similar companies in the same industry. Local agent will further establish on the part of subject(s) in question to have any direct or indirect links to the organization's customer or client or to a relevant public official which could lead to bribery (this would include persons who are not public officials themselves, but who may be directly or indirectly related to public officials, candidates for public office, etc.); Local agents will include a description of the developed resource's position and the category of each resource.	✓	
Undertake research with publicly available property records and asset ownership on the part of subject(s) in question.	✓	
Comprehensive local and international sanction list screenings.	✓	

3PRM-Certified™

Third-party compliance verification and certification

Third-party relationships are critical in business today, and include partnerships with suppliers, distributors, consultants, agents and other contractors. While such affiliations are essential to the success of your organization, the consequences of inadequate due diligence cannot be overestimated.

CRI Group's exclusive 3PRM-Certified™ solution provides the very best in third-party risk management. Our 3PRM strategy provides a proactive approach to mitigating risks from third-party affiliations, protecting the organization from liability, brand damage and harm to business.

The **3PRM strategy** includes a focus on:

- Providing third-party risk assessments
- Meeting contracting requirements
- Conducting due diligence
- Identifying potential fraud risks
- Providing management oversight

Utilizing a network of trained professionals positioned across five continents, CRI Group's 3PRM services utilize one of the largest multi-national fraud investigation teams the industry has to offer.

The 3PRM strategy is especially critical when your business is performing pre-merger and acquisition research and pre-IPO due diligence, engages new clients, employs, contracts or retains foreign business partners and requires a consistent and audit-worthy AML and anti-corruption compliance program.

CRI Group provides the knowledge required to navigate unfamiliar markets by assessing the backgrounds, integrity and character of those with whom you do business.

Aside from establishing compliance with international standards and bolstering an organization's anti-bribery and anti-corruption program, certification through CRI Group's 3PRM-Certified training could potentially reduce corporate insurance premiums and ultimately improve quality control and enhance productivity over time.

CRI Group's 3PRM-Certified™ solution can help mitigate the risks associated with third-party affiliations by exposing:

- Purposefully Hidden Ownership ("Ultimate Beneficial Owner")
- Business Operations & Solvency
- Poor Reputation
- Past Allegations of Corruption
- Production, Quality or Delivery Issues
- Key Assets
- Inappropriate Political Affiliations
- Conflicts of Interest
- Licensing & Credentialing Issues
- Links to Organized Crime
- Improper Payment Arrangements
- Workforce & Human Rights Issues



Corruption is primarily a cultural problem that will take generations to address.

— Christine Lagarde,
International Monetary Fund



We have been working with CRI Group since 2011 for our integrity due diligence and employment background screening requirements, specifically in Asia and Middle East countries. A majority of the requirements supported by CRI Group's excellent investigative research skills to unearth negative character and qualifications of the subjects resulted in not only protection of our company assets but a well-informed decision in a timely manner.

- EVP, Chief Counsel for the Americas Large Energy Group, New York, NY, United States

The top risks posed by third-party partners:

- **Harm to reputation.** Adverse effects (including unethical behavior) and negative opinions attached to a third party can damage your organization's reputation.
- **Non-compliance issues.** A third-party partner that fails to meet regulations or compliance standards can adversely affect your business.
- **Negative financial impacts.** A third party's system failures, human mistakes, fraud or an incapability to provide services will impact your bottom line.
- **Supply chain risk.** What happens if your critical suppliers go out of business suddenly, or are faced with shortages causing gaps in delivery?
- **Security threats.** Your third-party partners may have access to your trade secrets and Intellectual Property (IP). How well do you know their employees?

YOUR COMPANY IS LIABLE FOR BRIBERY COMMITTED BY THIRD-PARTY AFFILIATES

International laws and regulations (including the FCPA and UK Bribery Act) make various forms of bribery a crime, punishable by unlimited fines, forfeiture of public contracts, and possible imprisonment of the organization's senior officials.

Those regulations define bribery, receiving a bribe, or failing to prevent a bribe in these terms:

- Bribery in the public, private and not-for-profit sectors.
- Bribes made by the organization, its personnel, or outside business associates.
- Bribes made to the organization, its personnel, or outside business associates.
- All direct and indirect bribes, including those offered or accepted through or by a third party.

It's important to stress that your organization will be criminally responsible for acts of bribery committed by outside business partners (such as agents, consultants, suppliers, distributors and other third-parties) working on your behalf.

The most effective defense from prosecution is to implement internationally accepted controls and systems designed to prevent bribery. These measures involve an effective anti-bribery plan, leadership buy-in, personnel training, risk assessment, due diligence, financial and commercial controls, reporting mechanisms, and audit and investigation procedures.

CRI Group

A Global Leader in Corporate Investigations and Risk Management

CRI Group has emerged as a global leader in corporate investigations and risk management, serving distinguished clients across Europe, Asia Pacific, South Asia, the Middle East, North Africa and North America. CRI Group safeguards businesses by establishing the legal compliance, financial viability, and integrity levels of outside partners, suppliers and customers seeking to affiliate with an organization. CRI Group excels in providing support to the global business and financial sectors in the areas of:

- Anti-Bribery | Anti-Corruption Centre of Excellence
- Risk Management Assessment & Investigations
- Corporate Intelligence
- Integrity Due Diligence
- Fraud Risk Investigations
- Fraud and White Collar Crime
- Insurance Fraud Investigations
- Corporate Security Investigations
- Business Intelligence and Investigations
- Forensic Accounting and Investigations
- Intellectual Property Investigations
- AML KYC and Due Diligence Services
- Employment Screening and Background Investigations

CRI Group's global integrity due diligence investigations provide your business with the critical information it needs in making sound decisions regarding mergers and acquisitions, strategic partnerships and the selection of agents, vendors and suppliers. This level of due diligence will help ensure that working with a potential outside party will ultimately achieve your organization's strategic and financial goals.

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Intellectual property infringement is a large problem we face while operating in Asia. We engaged CRI Group with a recommendation from our regional Corporate Security Director in 2004 to undertake IP investigations, background checks and distributor screening in the region. CRI Group's on-ground investigative research and comprehensive and professional reports uncovered facts that found associations of local vendors and business partners with highly objectionable and negative personal and professional affiliations. CRI Group remains the preferred partner of our global compliance and ethics team.

— Executive Director Global Corporate Security,
A Leading Fortune 500 Consumer Product Manufacturer

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Contact us today

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“ CRI Group was engaged by our U.K. Head Quarter Legal Team initially in 2009 to undertake due diligence and anti-bribery investigative research reports involving local vendors, suppliers and distributors in the Middle East. CRI Group's due diligence reports are very professional and provided investigative research adequately, which is very important to retain this company on our preferred vendor list with every second year's performance review. CRI Group will be our valued partner across Middle East and Asia regions, integrity due diligence being part of our 2017 Anti-Bribery and Anti-Corruption (ABAC) Program.

– Head, Global Procurement Services,
Large Pharmaceutical Company, London, U.K.