

WHY WILL COMPANIES WANT (OR NEED) TO BECOME ISO 37001 CERTIFIED?

BUSINESS REASONS:

LEVERAGE AND OBTAIN VALUE FROM EXISTING FCPA AND ANTI-CORRUPTION PROGRAM COSTS

EXISTING **FCPA ANTI-CORRUPTION PROGRAM** = UNCERTAIN "INSURANCE" VALUE - UNTIL TESTED IN WORST CASE DOJ INVESTIGATION SCENARIO

FUNDAMENTAL PROBLEM: BACK-END ANALYSIS

ISO 37001 ANTI-BRIBERY MANAGEMENT SYSTEM CERTIFICATION = TANGIBLE AND POSITIVE GLOBAL STANDARD-BASED ACHIEVEMENT WITH ASSOCIATED BUSINESS ADVANTAGES

KEY BENEFIT: FRONT-END ANALYSIS

REDUCE SUPPLY CHAIN AND COMPLIANCE COSTS

OPPORTUNITIES TO MAKE ISO 37001 CERTIFICATION A SUPPLIER/BUSINESS PARTNER REQUIREMENT AND ELIMINATE TIME & RESOURCE-CONSUMING "ONE OFFS" AND "BATTLE OF THE FORMS" RESULTING FROM VARIATIONS IN COMPANIES' ANTI-CORRUPTION PROGRAMS

ISO 37001 BECOMES GLOBAL COMMERCIAL "COMMON ANTI-BRIBERY LANGUAGE", AS ISO 9001 HAS DONE FOR QUALITY, AND ISO 14001 HAS DONE FOR ENVIRONMENTAL, AND ISO 27001 HAS DONE FOR INFORMATION SECURITY- WITH ASSOCIATED "RECOGNIZED STANDARD" EFFICIENCIES

GENERATE (OR MAINTAIN) REVENUE

MAKE CUSTOMERS AWARE OF CERTIFICATION, YOUR INCREASED VALUE TO THEM FROM OBTAINING CERTIFICATION (E.G. YOUR DECREASED RISK PROFILE) AND ASK FOR MORE BUSINESS (SEE BRITISH CASE STUDIES W/ ISO 9001 AND POSITIVE REV. IMPACT)

FEATURE CERTIFICATION IN RFP AND RFQ RESPONSES TO SERVE AS A DIFFERENTIATOR

STAY ELIGIBLE FOR BUSINESS - WITH CUSTOMERS THAT MAKE ISO 37001 CERTIFICATION A SUPPLY CHAIN REQUIREMENT

COMPANY ADOPTION TO DATE

MICROSOFT HAS PUBLICLY ANNOUNCED THAT IT WILL ADOPT ISO 37001

WALMART HAS PUBLICLY ANNOUNCED THAT IT IS CONSIDERING ADOPTION OF THE STANDARD

OTHER FORTUNE 500 AND SMALLER COMPANIES ARE NON-PUBLICLY EXPLORING ADOPTION

LEGAL REASONS:

ALIGNMENT WITH DOJ AND SEC COMPLIANCE PRIORITIES

ISO 37001 EMPHASIZES THE "OPERATIONALIZATION" OF CORPORATE ANTI-CORRUPTION ACTIVITIES THAT DOJ IS ALSO EMPHASIZING IN DPAs AND PUBLIC STATEMENTS

AT THE NOV. '16 ACI FCPA CONFERENCE IN WASHINGTON DC, THEN-DOJ FRAUD SECTION CHIEF ANDREW WEISSMAN STATED THAT DOJ MAY TAKE ISO 37001 CERTIFICATION INTO CONSIDERATION FOR PURPOSES OF DPA (DEFERRED PROSECUTION AGREEMENT) PENALTY ASSESSMENT/MONITOR REQUIREMENTS

TANGIBLE DEMONSTRATION OF BEING A GOOD CORPORATE CITIZEN BY "GOING ABOVE AND BEYOND" DOJ/SEC GUIDELINES OR OTHER (LESS DETAILED) COMPLIANCE PROGRAM GUIDANCE

STRATEGIC OPTION FOR COMPANIES UNDER INVESTIGATION OR EXPECTING AN INVESTIGATION TO BEGIN, OR FOR COMPANIES IN HIGH-FCPA-RISK SITUATIONS (DUE TO OPERATING LOCATION(S), SECTOR(S) AND/OR HISTORY)

ISO 37001- ANTI-BRIBERY MANAGEMENT SYSTEMS OVERVIEW