

Monitoring, Review, and Enforcement Document

Anti-Bribery Policy

1. Purpose

This document outlines the procedures for the monitoring, review, and enforcement of the organization's Anti-Bribery Policy to ensure ongoing compliance and effectiveness.

2. Scope

This document applies to all employees, contractors, consultants, and agents acting on behalf of the organization.

3. Monitoring Activities

- Regular internal audits on financial transactions and business processes.
- Review of gift and hospitality logs.
- Employee training participation record checks.
- Anonymous whistleblowing channels and follow-up.
- Random spot checks in high-risk departments.

4. Review Process

Review Component	Frequency	Responsible Party	Notes
Policy review	Annually	Compliance Officer	Update as necessary
Training effectiveness	Bi-Annually	HR Department	Assess via feedback/survey
Audit of transactions	Quarterly	Internal Audit Team	Focus on high-risk operations
Whistleblowing reports	Ongoing	Legal Department	Investigate within 30 days

5. Enforcement Action

- Investigation of all suspected breaches in a timely and confidential manner.
- Disciplinary measures may include formal warning, suspension, or termination.
- Report to relevant law enforcement agencies if applicable.
- Remedial actions to address process/system weaknesses.

6. Record Keeping

- Maintain logs of monitoring and review activities for a minimum of 5 years.
- Documentation of investigations and outcomes securely stored.
- Annual summary report submitted to senior management.

Important Notes

- This document should be reviewed and updated regularly to reflect changes in regulations or organizational structure.
- Clear roles and responsibilities should be assigned for each monitoring and enforcement activity.
- Confidentiality and protection for whistleblowers must be upheld at all times.
- Non-compliance with the policy may result in severe internal and legal consequences.

