

Federal Sentencing Guidelines

Guidelines for an Effective Compliance and Ethics Program	How we help
Establish standards and procedures to prevent and detect criminal conduct.	<ul style="list-style-type: none"> ▪ Code of Conduct Development and Review
<p>Governing authorities must be knowledgeable about the content and operation of the compliance and ethics program; high level personnel must have overall responsibility for and ensure that the organization has in place an effective compliance and ethics program; and specific individuals must be delegated day-to-day operational responsibility for the compliance and ethics program.</p>	<ul style="list-style-type: none"> ▪ Risk and Program Assessments ▪ Board and Executive Training ▪ Investigations Training
Take reasonable steps to periodically communicate established standards and procedures by conducting training programs and disseminating information about roles and responsibilities.	<ul style="list-style-type: none"> ▪ Code of Conduct Publication, Distribution, Training, and Certification ▪ Training Courses ▪ Policy and Procedure Awareness Campaigns

Reference: Federal Sentencing Guidelines Manual, <http://www.ussc.gov/guidlin.htm>

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<p>Take reasonable steps to ensure that the compliance and ethics program is followed through monitoring and auditing; evaluate periodically the effectiveness of the compliance and ethics program; have and publicize a system that allows anonymous or confidential mechanism where employees and agents may report or seek guidance about potential or actual criminal conduct without fear of retribution.</p>	<ul style="list-style-type: none"> ▪ Anonymous Hotline – Phone and Web ▪ Case Management ▪ Analytics
<p>Promote and enforce the compliance and ethics program consistently throughout the organization.</p>	<ul style="list-style-type: none"> ▪ Hotline Awareness Campaigns
<p>Take reasonable steps to respond appropriately to criminal conduct when it is detected, and prevent further similar conduct, which could include modifying the existing compliance and ethics program.</p>	

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