

SME 17 Checklist for CAC SME Certification

The checklist can be divided into the following topics:

- 1 checklist on risk assessment
- 4 checklist on internal system
- 3 checklist on policies and procedures
- 3 checklist on communication
- 4 checklist on human resource management
- 1 checklist on whistleblowing
- 1 checklist on reviewing and improving the anti-corruption system

	SME Checklist	Checklist Requirement
Risk assessment	1. The SME must examine relevant bribery risks that exist in business operations such as permit applications and project procurements. A thorough risk assessment is essential for creating a robust anti-bribery policy, internal control system, and implementation.	A complete registry of the company's bribery risks and internal controls to reduce or eliminate the risks (internal controls are mandatory for risks with score above 4 or top 3).
Internal Control System	2. The SME has a good accounting practise, which has been verified and audited by third-party including a statement that the SME only has one accounting book.	The latest SME's accounting report filed by an independent auditor plus a letter from the owner or CEO stating that the company has only one accounting book (no financial statements needed).
	3. The SME has formal procedures to regularly monitor high risk activities such as sales, marketing, and procurement.	Flowcharts detailing business activities with high bribery risk and relevant control measures (signed by the business owner or CEO).
	4. The SME has control measures to monitor and record fund disbursements and reimbursements from high risk departments and data retention on	Process details relating to fund disbursements and reimbursements including data retention processes, procedures, data storage procedures, type of information stored, person(s) or department(s) responsible for updating the database and backup plan.

	activities with bribery risk such that information can be easily retrieved.	.
	5. The SME has taken proper precautions to keep documents organized so that they will always be ready for auditing.	Procedures related to storing important documents including details on accountable party or parties, department(s) and storage location(s).
Policy	6. The SME has official anti-corruption policies and procedures to help employees conduct activities, which might be considered as bribe such as giving gifts, paying for meals and entertainment, donating money to non-profit organizations or foundations, supporting government officials or politicians and hiring third-party.	The policies and employee guidelines that are relevant to or deals directly with high risk activities.
	7. The SME has clear definitions that defines bribes, channels and parties involved.	Definitions for words related to bribery and corruption. At minimum, definitions must include corruption, bribery, government official, gift giving, entertainment, sponsorship, donation, third-party and agent.
	8. The anti-corruption policy has been officially approved and signed by business owner, Chairman of the Board or CEO.	The business owner, Chairman of the Board, or CEO must sign documents approving or enacting the anti-corruption policy.
Communication	9. The SME communicates publicly about its anti-corruption policy and procedures through different channels such as on their website, publication, email header, and/or receipt	Proof that the company publicizes its anti-bribery policy and procedures such as a screenshot of company website, copy of email header, or company issued receipts with the information.
	10. The SME informs its business partners about their anti-bribery policy, procedures and channels	Proof that the SME has informed its partners such as copies of official emails or letters.

	to report bribery related incidences.	
	11. The SME continually communicates with its employees about anti-bribery through different channels such as company website, announcement boards, or flyers.	Proof that the company communicated to its employees about its anti-bribery policy and procedures.
Managing Company Personnel	12. The SME has plans to select, evaluate, and reward employees for their commitment to anti-corruption policy.	Documents relating to personnel management that includes selection, evaluation, and rewards that supports its commitment to anti-corruption.
	13. The SME trains new and existing personnel on anti-corruption. The courses should cover topics such as negative impact of corruption, anti-corruption laws, corruption channels, how to refuse bribe requests and whistleblowing channels.	Details outlining the training course(s) including the departments (or personnel) that will be trained, topics covered in the training course, how the course will be carried out (internal classroom training, training with an external agency, or E-learning), and the duration of the course.
	14. The SME has a policy not to demote or discipline employees who refuse to participate in bribery even if it limits business opportunities.	Details of policy to protect all personnel who refuse to participate in bribery signed by the business owner or CEO.
	15. The SME has disciplinary actions for its executives and employees who fail to comply with its anti-corruption policy and guidelines.	Details of disciplinary actions stated in the company's personnel guideline.
Reporting incidents of corruption	16. The SME has whistleblowing channels for reporting misconduct relating to bribery.	Documents outlining the different whistleblowing channels, reviewing process, reviewers, responsibilities of each reviewers, duration of process, and time to report back to the whistleblower.

Reviewing and Improving Internal Processes	17. The Anti-corruption checklist is reviewed by the SME's owner or CEO each year and improvements are made according the changes in business activities and the associated risks.	Documents signed by the SME owner or CEO agreeing that they will review and improve the anti-corruption checklist annually.
---	--	---