

### SME 17 Checklist for CAC SME Certification

	No.	SME Checklist - EN	What SME Must Have to Pass the Checklist
Corruption Risk Assessment	1	The SME must examine relevant bribery risks that exist in business operations such as permit applications, project procurements, credit, sales, marketing, imports/exports, and tax payment. A thorough risk assessment is essential for creating a robust anti-corruption 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).
Internal Control for Corruption Risks	2	The SME has a good accounting practice, which has been verified and audited by a third-party. The SME should also have only one accounting book.	The latest SME's accounting report filed by an independent auditor plus a letter from business owner or CEO stating that the company has only one accounting book.
	3	The SME has formal procedures to regularly monitor departments with high risk activities such as sales, marketing, credit, and procurement to ensure that these departments honor the company's anti-corruption policy.	Flowcharts detailing business activities with high bribery risk and relevant control measures signed by business owner or CEO.
	4	The SME has a good control over monitoring and recording fund disbursements and reimbursements from high risk departments. The SME also has a good data retention on activities with bribery risks such that information can be easily retrieved.	Procedure and/or process details relating to fund disbursements and reimbursements including data retention procedures and processes, type of information stored, person(s) or department(s) responsible for updating the database and backup plan.
	5	The SME has a proper way of organizing documents so that they will always be ready for auditing.	Procedure details relating to storing important documents including details on accountable party or parties, department(s) and storage location(s).
Anti-Corruption Policy and Procedure	6	The SME has an anti-corruption policy and measures that cover high risk activities such as giving and receiving gifts, paying for meals and entertainment, donating money to nonprofit organizations or foundations, supporting government officials or politicians, and hiring a third-party.	Company policies and employee guidelines that address high risk activities.
	7	The SME has a clear definition of bribery that includes channels of bribery and parties involved.	Definitions for bribery- and corruption-related activities. At minimum, the definitions must include corruption, bribery, government official, gift giving, entertainment, sponsorship, donation, stakeholders, and distributors.
	8	The anti-corruption policy has been officially approved and signed by business owner, Chairman of the Board, or CEO.	The anti-corruption policy that is approved and signed by business owner, Chairman of the Board, or CEO.
Communication	9	The SME communicates publicly about its anti-corruption policy and measures through different channels such as on their website, company publication, email header, and receipt.	Proof that the SME makes publicly available its anti-corruption policy and measures. Proofs can be a screenshot of company website, copy of email header, or company-issued receipts with the information.
	10	The SME informs its business partners about its anti-corruption policy, procedures, and channels to report bribery-related incidences.	Proof that the SME informs its partners of its anti-corruption policy and measures such as copies of official emails or letters.
	11	The SME regularly communicates with its employees about its anti-corruption policy and measures through different channels such as company website, announcement boards, or flyers.	Proof that the SME communicates to its employees about its anti-corruption policy and measures such as a photo of company announcement board or website.
Human Resource Management	12	The SME has a transparent human resource management policy that is in line with the company's anti-corruption policy. The policy should include selection, evaluation, and promotion criteria.	A human resource management policy that includes selection, evaluation, and promotion criteria approved and signed by business owner or CEO.
	13	The SME trains new and existing personnel on anti-corruption. The topics should cover negative impacts of corruption, anti-corruption laws, corruption channels, how to refuse bribe requests, and whistleblowing channels.	A training schedule outlining the training course(s) including the departments (or personnel) that will be trained, topics covered, 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 punish employees who refuse to get involved in bribery even if it costs the company business opportunities.	Details of the policy to protect all personnel who refuse to participate in bribery signed by 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 measures.	Details of disciplinary actions stated in the company's personnel guideline.
Raising Concerns and Seeking Guidance	16	The SME has a safe and functioning whistleblowing channel for employees and stakeholders to report misconduct relating to bribery.	Documents outlining whistleblowing channels, reviewing process, reviewers, responsibilities of reviewers, duration of process, and time to report back to the whistleblower.
Review, Assess and Improve	17	The anti-corruption checklist is reviewed by company owner or CEO each year and adjustments or improvements are made according to the changes in business activities and the associated risks.	A document signed by business owner or CEO agreeing that they will review and adjust and improve the anti-corruption policy and measures annually.