

Iceland 
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CLEANBIZ
Iceland * Norway * Portugal

SELF-ASSESSMENT CHECKLIST

Power-up Anti-bribery for Human Rights and Sustainable Development

Based on Transparency International's business integrity conceptual framework, and with a clear focus on fighting foreign bribery, CLEANBIZ supports the implementation and the enforcement of the OECD Anti-Bribery Convention by combining anti-corruption and human rights compliance and due diligence with awareness-raising and training directed to the business sector.

Companies face many compliance challenges which can turn out to be incredible damaging, not only for the companies' reputation, but also lead to heavy fines and criminal charges that can completely derail their economic and financial viability.

This very basic Self-Assessment Checklist is specially curated for SMEs and Startups in Iceland, Norway and Portugal that often lack resources and know-how to develop sustainable integrity programs.

The aim is to provide them with a first glimpse of where they should stand in terms of their anti-corruption policy and implementation, serving as first point of entry to further engage businesses in understanding and improving their commitment to integrity.



You are clear on our values when we doing business abroad

Corruption is a transnational phenomenon that has devastating impacts on human rights, undermines the rule of law and the legitimacy of the State's institutions and processes, and equally reduces business opportunities and the profitability of companies.

Thus, the first step in adopting a responsible business conduct is to recognize integrity as a core value that needs to be streamlined to all the company's operations and incorporated by all company's members into their day-to-day activities, regardless of the location.

Ask yourself how you translate zero tolerance to corruption and human rights abuses into corporate practice

We don't pay bribes to secure business opportunities

Yes	No	Unsure
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We adopt a responsible business conduct towards the affected communities

Yes	No	Unsure
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We disclose all our operations at home and abroad, including non-financial projects and even support to any social and cultural initiatives, for example, support to charities

Yes	No	Unsure
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Our Shareholders/ Directors/ Managers are transparent regarding any financial and social interests, namely ownership and membership. For example, if they owe financial interest in other companies, if they are active members of public and private organizations, such as political parties, foundations, NGOs, etc., and especially if they qualify as Political Exposed Persons (PEPs)

Yes	No	Unsure
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We don't use tax heavens for transfers and payments

Yes	No	Unsure
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2

You embody national and international standards on anticorruption and human rights, and incorporate them into your corporate practice regardless of the location

It is a good start to familiarise you and your team with the principles inscribed in international standards against corruption and for the protection of human rights.

Sometimes, your values set a higher standard, which is a positive. If your values do not meet standards, it is advised to revisit them. Don't forget to document your do's and don'ts keeping in mind that just filing them is unlikely to be effective. Get into the habit of discussing your policies regularly, test dilemmas among teammates, and include your values when onboarding new team members.

Open and regular dialogue can help you document, communicate, implement and monitor your values and policies. Remember to update them systematically, and don't miss the opportunity to include your staff in that work.

This will help you embed your values and approaches into the fibre of your operations.

Ask yourself if you are walking the talk (capacity building and monitoring)

	Yes	No	Unsure
We implement national and international standards on anti-corruption and human rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We document our dos and don'ts, ie, we have a company's code of conduct and internal rules, so that our commitment to integrity is clear internally and externally	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We actively communicate our zero tolerance for corruption internally and externally	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
We monitor, test, and update our integrity framework	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3

You understand that some places represent more integrity challenges than others, and assess the risks

The risks may vary in terms of markets, partners, and sectors, since some are more vulnerable to corruption and human rights violations. But it is essential to implement the same standards for anticorruption and human rights at home and abroad

You may use the Corruption Perceptions Index as an entry to take the temperature on corruption risks, but you are encouraged to dig deeper into country specific risks in relevant sectors. For example, the use of agents may represent a risk when it comes to conflict of interest issues, the amount of the compensation to the agent, and the transaction mode.

You should also avoid transactions via tax havens.

In terms of business partnerships, pay attention to beneficial ownership transparency and transparency in corporate reporting: you must be able to identify owners and beneficial owners, you must access to all business information, namely the one related to financial flows.

Ask yourself if you can risk not risk mapping. And ask yourself if you have done the risk assessment you need for your business

We conduct due diligence to be aware of the norms and regulations in place, and also the risks we might face when deciding to do business abroad

Yes	No	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For international agents, we check if he/she is a Political Exposed Person (PEP) or have any sort of connection to PEPs, Public Officials or Political actors. If that's the case, we apply the extended due diligence measures

Yes	No	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We start any new partnerships knowing the beneficial owners of the companies we are working with (business partners, subsidiaries and affiliates)

Yes	No	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4

You create a safe environment for internal reporting of corruption and human rights violations

Whistleblowers are in the forefront in detecting corruption, human rights violations and mismanagement. However, whistleblowers often experience harassment and gets a hard time in the workplace for speaking out. Whistleblowers needs protection and their rights should be respected.

In our company we have established a mechanism for coming forward with complaints. We make sure that complaints are followed up with adequate investigation and we make sure that the whistleblowers experience a safe working environment.

Ask yourself if speaking up is part of your company's culture. And ask yourself if you are able to protect whistleblowers

We treat whistleblowers as an asset, and proactively take responsibility for the company's actions

Yes	No	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

We don't spend time and resources in denying wrongdoing. Instead, we are fully transparent, we investigate, and we act to improve

Yes	No	Unsure
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>