

# Anti-Corruption

## ***DRAFT*** Topical Requirement User Guide



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# Overview of Topical Requirements

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Topical Requirements are an essential component of the International Professional Practices Framework® along with the Global Internal Audit Standards™ and Global Guidance. The Institute of Internal Auditors requires the Topical Requirements to be used in conjunction with the Global Internal Audit Standards (Standard 4.1 Conformance with the Global Internal Audit Standards), which provide the authoritative basis of the required practices. References to the Standards appear throughout this guide as a source of more detailed information.

Topical Requirements formalize how internal auditors address prevalent risk areas to promote quality and consistency within the profession. The Internal Audit Mandate clearly defines the scope and types of services undertaken by the internal audit function, including consideration of Topical Requirements (Standard 6.1 Internal Audit Mandate). Topical Requirements establish a baseline and provide relevant criteria for performing assurance services related to the subject of a Topical Requirement (Standard 13.4 Evaluation Criteria). Conformance with Topical Requirements is mandatory for assurance services and recommended for evaluation during advisory services. Topical Requirements are not intended to cover all potential aspects that should be considered when performing assurance engagements; rather, they are intended to provide a minimum set of requirements to enable a consistent, reliable assessment of the topic.

Topical Requirements clearly link to The IIA's Three Lines Model and the Standards. Governance, risk management, and control processes are the main components of Topical Requirements, aligning with Standard 9.1 Understanding Governance, Risk Management, and Control Processes. In reference to the Three Lines Model, governance links to the board/governing body, risk management links to the second line, and controls or control processes link to the first line. While management is represented in both the first and second lines, the internal audit function is depicted in the third line as an independent and objective assurance provider, reporting to the board/governing body (Principle 8 Overseen by the Board).

## Applicability, Risk, and Professional Judgment

Topical Requirements must be followed when internal audit functions perform assurance engagements on subjects for which a Topical Requirement exists or when aspects of the Topical Requirement are identified within other assurance engagements.

As described in the Standards, assessing risk is an important part of the chief audit executive's planning. Determining the assurance engagements to include in the internal audit plan requires assessing the organization's strategies, objectives, and risks at least annually (Standard 9.4 Internal Audit Plan). When planning individual assurance engagements, internal auditors must assess risks relevant to the engagement (Standard 13.2 Engagement Risk Assessment).



When the subject of a Topical Requirement is identified during the risk-based internal audit planning process and is included in the audit plan, then the requirements outlined in the Topical Requirement must be used to assess the topic within the applicable engagements. In addition, when internal auditors perform an engagement (whether included or not in the plan), and elements of a Topical Requirement emerge, the Topical Requirement must be assessed for applicability as part of the engagement. Lastly, if an engagement is requested that was not originally in the plan and includes the topic, the Topical Requirement must be assessed for applicability. (See Standard 9.4 regarding changes to the audit plan.)

Professional judgment plays a key role in applying the Topical Requirement. Risk assessments drive chief audit executives' decisions about which engagements to include in the internal audit plan (Standard 9.4). Additionally, internal auditors use professional judgment to determine which aspects will be covered in each engagement (Standards 13.3 Engagement Objectives and Scope, 13.4 Evaluation Criteria, and 13.6 Work Program) and to identify the resources necessary to achieve the engagement objectives (Standard 13.5 Engagement Resources).

Not all individual requirements may apply to every engagement, and some may be fulfilled through other approaches. If a requirement is excluded or superseded by other regulatory or contractual requirements or addressed through implementation of procedures in conformance with the Standards, the rationale must be documented and retained. Conformance will be evaluated during quality assessments.

Conformance with the Topical Requirement must be documented using auditors' professional judgment as described in Standard 14.6 Engagement Documentation.

While the Anti-Corruption Topical Requirement provides a baseline of control processes to consider, organizations that evaluate the risk topic as very high may need to assess additional aspects.

If a chief audit executive determines that the internal audit function does not have the required knowledge to perform audit engagements on a Topical Requirement subject, the engagement work may be contracted with an external service provider (Standards 3.1 Competency, 7.2 Chief Audit Executive Qualifications, 10.2 Human Resources Management). Chief audit executives may find The IIA's [Internal Auditing Competency Framework™](#) a helpful resource. The Standards apply to any individual or function that provides internal audit services, whether an organization employs internal auditors directly, contracts them through an external service provider, or both. The chief audit executive retains the ultimate responsibility for ensuring conformance. In addition, if the chief audit executive determines internal audit resources are insufficient, the chief audit executive must inform the board about the impact of insufficient resources and how any resource shortfalls will be addressed (Standard 8.2 Resources).

## Performance, Documentation, and Reporting

When applying Topical Requirements, internal auditors also must conform with the Standards, conducting their work in alignment with Domain V: Performing Internal Audit Services. The standards in Domain V describe planning engagements (Principle 13: Plan Engagements Effectively), conducting engagements (Principle 14: Conduct Engagement Work), and communicating engagement results (Principle 15: Communicate Engagement Results and Monitor Action Plans).



Topical Requirements are designed to support consistent and high-quality internal audit practices. They are to be applied in conjunction with applicable local laws, regulations, supervisory expectations, and other professionally recognized frameworks, which may impose additional or more specific requirements. Internal auditors may have already developed engagement work programs and testing procedures based on these regulations and frameworks. Internal auditors should reconcile their intended anti-corruption control testing and any reliable testing provided by other internal and external assurance providers (Standard 9.5 Coordination and Reliance) to the Topical Requirement to ensure adequate coverage.

Coverage of the Topical Requirement can be documented in either the internal audit plan or the engagement work program based on auditors' professional judgment. One or more internal audit engagements may cover the requirements. In addition, not all requirements may be applicable. Evidence that the Topical Requirement was assessed for applicability must be retained, including a rationale explaining any exclusions.

## Quality Assurance

The Standards require the chief audit executive to develop, implement, and maintain a quality assurance and improvement program that covers all aspects of the internal audit function (Standard 8.3 Quality, Standard 8.4 External Quality Assessment, Standard 12.1 Internal Quality Assessment). The results must be communicated to the board and senior management. Communications must report on the internal audit function's conformance with the Standards and achievement of performance objectives.

Conformance with Topical Requirements should be considered in supervisory activities at the engagement level (Standard 12.3 Oversee and Improve Engagement Performance) and will be evaluated in quality assessments.

## Anti-Corruption

The IIA defines corruption as acts in which individuals wrongfully use their influence in a business transaction to procure some benefit for themselves or another person, contrary to their duty to their employer or the rights of another (for example, kickbacks, self-dealing, or conflicts of interest).<sup>1</sup> In both the public and private sectors, it encompasses a wide range of unethical and/or illegal behaviors that undermine integrity, transparency, and fairness in decision-making. This Topical Requirement is intended to cover the topic of corruption, including bribery, and is not intended to cover other types or categories of fraud.

The financial costs of corruption are estimated to have a significant impact on the global economy, which highlights the critical need for anti-corruption programs and robust control processes. Corruption not only weakens trust in organizations, corporations, government, and elected officials but may also irreparably harm the communities where such activities occur.

Every organization is at risk of corruption, regardless of size, industry, or jurisdiction. The ultimate impact of corruption is largely driven by 1) the external environment in which the organization

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1. Urton Anderson, Michael J. Head, Cris Riddle, Mark Salamasick, and Paul J. Sobel, *Internal Auditing: Assurance and Advisory Services*, 6th ed. (Internal Audit Foundation, 2025), 221.



operates, 2) how the organization designs its internal processes and controls to operate in that environment, and 3) the ethical culture within the organization.

External corruption risks may arise from weak regulatory environments, political instability, limited transparency, inadequate enforcement of anti-corruption laws, significant government-private sector interaction, high-risk third-party relationships, and intense market competition. Organizations operating in such environments require stronger governance, risk management, and control processes.

The external corruption landscape can be navigated by establishing appropriate, adequate, and effective governance, risk management, and control processes to mitigate corruption risks. This is where internal audit functions in both the public and private sectors can play a critical role in helping organizations prevent, detect, and mitigate corruption.

While the role of internal audit functions in combating corruption is widely recognized and encouraged in many regions, it is not always mandated. Nonetheless, internal auditing is uniquely positioned to evaluate the organization's tone at the top, assess controls over third parties and business processes susceptible to corruption, identify indicators and anomalies, and provide assurance that controls are appropriately designed and implemented to meet the organization's objectives. Internal audit's role is to provide independent assurance and advisory services regarding anti-corruption governance, risk management, and controls, rather than to conduct corruption investigations.

It is important that the internal audit function ensures it has appropriate authority to perform assurance and advisory work on anti-corruption topics in alignment with jurisdictional regulations, its mandate, and charter. It is also important to understand that corruption is a technical topic; therefore, the internal audit function must conduct its work in this area commensurate with the level of competence and expertise available. If the internal audit function or any internal auditors have roles in the anti-corruption program or in elements such as whistleblowing protocols, the affected auditors must consider objectivity and disclose their roles, if necessary, to ensure the scope of any assurance engagement is not affected.

While the number and types of corruption schemes vary, international standards, industry guidance, and regulatory bodies generally focus on corruption risks in these areas.

- **Bribery and kickbacks.** Bribery is a specific form of corruption, broadly defined as the promising, offering, giving, soliciting, or accepting of an undue advantage (something of value) to or from a public official or private sector employee. The bribe – either direct or indirect – is to influence them to act or refrain from acting in their official duties.<sup>2</sup> Kickbacks are a form of bribery in which an individual receives – directly or indirectly – something of value after they use their official duties to benefit one or more third parties, usually to the detriment of their own organization.
- **Charitable and political donations.** Corrupt payments may be disguised as donations to charities or as political contributions to a particular candidate or party. While many of these entities may appear to be properly registered and incorporated

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2. United Nations, United Nations Convention against Corruption (New York: United Nations, 2004), 17-18.



in their respective jurisdictions, they can be used as conduits to funnel corrupt payments to individuals and public officials.

- **Conflicts of Interest.** This is a situation in which a public or private individual has undisclosed personal connections that are, or could become, intertwined with their official duties. Such circumstances create a risk that personal interests will influence professional judgment or actions. These individuals could abuse their position, duties, and/or responsibilities to benefit themselves and/or third parties. Employees with close, frequent working relationships with third parties may be more susceptible to inappropriate interactions.
- **Corporate donations.** The process of donating organizational assets to individuals, communities, non-profit organizations, and government-controlled entities can be used to conceal bribes or corrupt intent. In many instances, the true recipient of the donation may be hidden, and the donation's purpose may be false or lack transparency. Corrupt donations can include transferring cash or monetary payments, property, equipment, materials, supplies, scrap, or raw materials.
- **Facilitation payments.** In many jurisdictions, public officials may request or demand small unofficial bribes to expedite routine or administrative actions for which the payer is already entitled. These bribes are referred to as facilitation payments. Many governments will consider these types of payments as illegal forms of corruption.
- **Accounting deficiencies.** Poor financial controls can allow for corrupt transactions within an organization's financial records. This may include corrupt practices such as intentionally manipulating financial statements.
- **Gifts and entertainment.** The giving and receiving of gifts and other forms of entertainment are common methods of corruption. Examples of attempts to influence decisions or secure favorable treatment can range from small, frequent entertainment (such as popular sporting events) to larger, one-time acts (such as giving public officials premium tickets to coveted concerts or other high-profile events). Examples of gifts may range from cash or cash equivalents (such as gift cards, prepaid debit cards, and vouchers) to high-value luxury items. Repeated low-value gifts or entertainment may, in aggregate, create a perceived conflict of interest.
- **Hiring of related parties.** Corruption can occur when an individual is hired as a favor for a third party, or at the request or direction of a third party, in exchange for an improper benefit. For example, a government official requests that an organization hire their nephew in exchange for awarding the organization a contract.
- **Sponsored travel.** In many industries and countries, it may be customary or contractual for an organization to cover the travel expenses of another party, such as public officials or representatives of a third party, when performing official duties (such as touring a new facility or receiving contractual training). Sponsored travel can become corrupted when official travel is enhanced with amenities such as first-class seating, luxury hotels, cash advances, sightseeing tours, or the presence of family members. In some instances, the trip may be purely personal and disguised as an official one.



- **Sponsorships.** A sponsorship occurs when an organization pledges funds or assets to support an individual, organization, or activity in exchange for name recognition or to promote the organization's brand or image. In corrupt sponsorships, the individual, organization, or activity may be false or misrepresented to disguise the recipients who are providing the improper benefit to the organization.

Although these are the most common risk areas, auditors should also stay alert for other areas with potential high risks for corruption. One such area that is growing in sophistication is the use of AI. The corrupt use of AI refers to the intentional misuse of AI systems for private gain by those entrusted with power. AI enables scammers to create highly realistic communications and impersonations designed to pressure an employee or official into acting quickly or sharing sensitive information.

It is important for an organization to balance the types of controls to deter, prevent, detect, and respond to corruption risks. Additionally, auditors should recognize that controls may be automated or require manual implementation, underscoring the need for strong governance structures, such as policies, procedures, and training to raise awareness.

To adequately assess anti-corruption efforts within an organization, internal auditors must understand the risk implications for their organization and recognize indicators of corruption that may require further investigation. This Topical Requirement does not cover investigations into corruption activities but rather focuses on providing a baseline for the internal auditor's assessment. Conformance with this Topical Requirement is not intended to provide absolute assurance that an internal audit function will detect all corruption acts within an organization.



# Considerations

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Internal auditors may use the following considerations to aid their assessment of the requirements in the Anti-Corruption Topical Requirement. The lettering of each consideration is cross-referenced to its corresponding requirement in the Topical Requirement. These considerations are illustrative examples intended to support professional judgment and are not mandatory requirements. Internal auditors should rely on professional judgment when determining what to include in their assessments.

Restrictions in public sector internal audit engagements due to legislation, government structure, or political environments are recognized as potential barriers to addressing certain aspects of this work. Internal auditors in the public sector should document such scope limitations as part of their risk assessment process and apply professional judgment to clearly define and communicate the tailored scope of their review.

## Governance Considerations

To assess how the governance processes are applied to anti-corruption objectives, internal auditors may review evidence that:

- A. An anti-corruption program or core compliance components established by senior management and approved by the board is periodically evaluated and revised as necessary based on the results of risk assessments and incident follow-up. Senior management promotes integrity through a clear "tone at the top" and promotes a culture of rewards and consequences by, for example.
  - Active engagement and communication around ethics policies, emphasizing a zero-tolerance attitude for corruption activities through an intranet site, organizationwide meetings, or internal newsletters.
  - Modeling of consistent ethical practices in decision-making by management.
  - Providing ethical guidelines for the organization and its employees, established in alignment with the risk appetite.
  - Periodically publishing an organizational newsletter or intranet articles highlighting positive examples from employees and operations.
  - Integrating ethical objectives into performance evaluations as an element for consideration for promotions.
  - Aligning incentive and nonmonetary recognition programs with ethical behavior.
  - Sharing consequences for violations.



- B. Anti-corruption expectations are documented in policies and procedures that cover:
  - Prohibited conduct such as accepting gifts in violation of policies.
  - Whistleblowing and other programs that provide secure, confidential, and anonymous channels for reporting suspected corruption or inappropriate activities without fear of retaliation.
  - Clear procedures for reporting perceived corruption issues that include how and to whom issues or concerns should be communicated or escalated.
  - Investigation and follow-up for root cause identification and for adding to or changing controls based on detected and corroborated incidents.
  - Consistent penalties applied for violations of the anti-corruption program and policies commensurate with the level of violation.
  - Working with third parties (for more, see Control Process Considerations, Section F).
- C. Descriptions of anti-corruption management roles and responsibilities are documented. Examples include:
  - Ownership of the program by senior management and oversight by the board, including accountability for implementation.
  - Position descriptions with specific responsibilities, qualifications, and authority levels for decision-making and enforcement activities.
  - Hiring and performance management practices for those employees with assigned accountability for anti-corruption roles and responsibilities, including specifications for training, autonomy, and access to the oversight body and to senior management.
- D. Procedures for communicating with relevant stakeholders are documented. Procedures should:
  - Include periodic reviews for needed updates.
  - Align with jurisdictional laws.
  - Require timely reporting on the status of the actions taken regarding performance, risks, compliance, and reported allegations (specifically breaches of laws and regulations).
  - Include collaborating with external auditors on corruption issues.

## Risk Management Considerations

To assess how risk management processes are applied to anti-corruption objectives, internal auditors may review evidence that:

- A. Processes for continuously identifying, assessing, reviewing, and managing corruption risks are established, include defined roles and responsibilities, and sufficiently address key risks relevant to the organization (such as strategic, reputational, ethical, operational, financial, trade compliance, geopolitical, and legal). Evidence includes:
  - A formal enterprise risk assessment (or the identification of activities with the potential for corruption) is conducted periodically and used in decision-making.



Examples of operational risks that could arise (based on the categories listed in the introduction) include: supply chain disruptions; loss of business opportunities; improper payments of cash, travel and nonmonetary benefits such as for hospitality; legal violations and sanctions; and reputation damage.

- AI or other tools may be used for predictive risk analysis to predict potential areas at greater risk of corruption before issues arise.
  - Communications across the organization of the corruption risk appetite, tolerance, and expectations for response.
- B.** Risk responses are implemented based on the ranking and prioritization of risks.
- Management has allocated resources to anti-corruption controls and processes based on periodic reviews of risks and lessons learned from regular monitoring of the various components of the compliance program.
  - Controls and compliance activities related to anti-corruption are tied to risk rankings/risk severity.
  - Results of scenario analysis and stress testing are used to anticipate and respond to emerging threats.
- C.** Processes to manage and escalate corruption issues, and provide accountability, may include:
- Confidential whistleblowing channels.
  - A formal intake and case tracking system.
  - Defined escalation criteria, with high-risk triggers or noted regulatory exposure.
  - Independent investigation mechanisms.
  - Documented resolutions with oversight by senior management.
  - Reporting to the board to ensure that issues are addressed and lessons learned are incorporated into the control environment.

## Control Process Considerations

To assess how control processes are applied to anti-corruption objectives, internal auditors may review evidence that:

- A.** The anti-corruption program and/or compliance elements are:
- Adequately resourced with responsibilities assigned to key personnel within the organization.
  - Designed to deter, prevent, detect, and respond to actions that may lead to corruption.
  - Maintained, reviewed, and updated on a periodic basis, such as annually.
  - Developed according to current global guidance practices for anti-corruption.
- B.** Anti-corruption policies and procedures are accessible and communicated to all employees and relevant parties. Methods include:



- Posting on an organization's intranet site.
  - Reference to policies and procedures in the onboarding of new employees.
  - Employees periodically sign acknowledgment forms indicating their understanding of key anti-corruption policies, such as zero-tolerance for bribery and disciplinary enforcement policies.
  - Adherence in the performance management process.
- C. Anti-corruption training and awareness programs are required periodically for all employees commensurate with the level of corruption risk associated with their position and duties. Examples of evidence to support conclusions around training programs include:
- Records documenting employee training.
  - Performance metrics tracked to assess employee understanding and effectiveness of training.
- D. A whistleblower or other similar program exists and includes:
- A secure mechanism for employees or external stakeholders to contact the organization anonymously, if so desired, and report suspicious activities or concerns.
  - Established monitoring roles for the reports received and procedures to triage and assign high-risk issues for further review or investigation.
  - Procedures include parameters to protect whistleblowers from retaliation.
- E. Internal controls to deter, prevent, and detect corruption are implemented. Examples include:
- General controls:
    - Segregation of duties established in processes with a high risk of corruption, such as accounts payable, procurement and sourcing, bidding and tender review, wire transfers and urgent payments, and petty cash management.
    - Approval levels assigned and enforced for transactions or activities.
    - Accurate, adequate, and authorized supporting documentation maintained for transactions (especially financial and accounting) and decisions.
  - Human resource controls:
    - Merit-based hiring and promotion procedures to reduce the risk of bribery, nepotism, discrimination, or favoritism in human resource decisions.
    - Processes for periodic background checks on employees in high-risk roles (such as sales, procurement, and inventory), to verify education, employment history, and potential conflicts of interest.
    - Procedures for incentive structures (bonuses, commissions) to disincentivize through discipline unethical behavior or the use of bribery to achieve performance targets.



- Bribery and kickbacks:
  - A process to validate urgent or emergency payments that do not follow the normal review and approval process.
  - A thorough review and screening performed on organizations insisting on payments to an offshore banking jurisdiction.
- Organizational donations (includes charitable and political):
  - An organizational donations process includes escalating controls and approvals depending on the type, value, and timing of an organizational donation.
  - Review of organizational donation receipts to ensure that the donations are free from conflicts of interest or a specific act of bribery and within acceptable value limits.
  - Rules include prohibitions of donations to political figures or officials to influence decisions.
- Conflicts of interest:
  - Employees are required to periodically sign forms disclosing whether they have perceived potential or actual conflicts of interest that could create a noncompliance situation.
  - An internal review and approval process to evaluate reported conflicts, specifically whether employee conflicts relate to third-party relationships, financial conflicts, or hiring conflicts.
  - A policy prohibits employees from personally benefiting from operations that they are involved in or oversee (for example, a materials manager personally taking scrap or a fleet manager personally buying a fully depreciated or retired asset).
- Facilitation payments:
  - A policy prohibits facilitation payments or specifies circumstances in which payments are allowed.
  - A financial recording or flagging process to document and review fines, penalties, or other payments to authorities, such as customs, police, military, or other government agencies and ministries.
- Accounting deficiencies:
  - General ledger accounts are set up to facilitate the proper recording and review of expenses (such as gifts, donations, and sponsorships) that could be more prone to corruption.
  - Periodic accounting reviews of accounts with a high risk of corruption to ensure that transactions are properly recorded in the financial records. Reviews may be conducted manually or through systems, possibly with AI assistance.
  - Procedures to review the maintenance and distribution of cash and cash equivalents.



- Cash advances to employees and third parties are properly approved, tracked, and monitored to ensure that funds are used explicitly for what the advance was requested for.
- Manual journal entry procedures require:
  - Authority to post.
  - Supporting documentation.
  - Review and approval.
- Gifts and entertainment:
  - Policies specify limits, approval, and frequency for allowed gifts and entertainment spending.
  - Escalation and approval procedures for situations that exceed defined limits.
  - Gifts and entertainment spending are periodically reviewed.
- Hiring of related parties:
  - The human resources or legal department maintains a defined disclosure and review procedure for current employees and prospective employees to report their relationships to related parties.
  - A procedure for reviewing requests to hire relatives of employees, customers, and/or government officials, including the prompt escalation of instances involving undue pressure.
  - New hire applications or onboarding forms require disclosure of relationships with current employees and/or high-ranking government officials whose interests interact with organizational objectives.
  - A policy prohibiting hiring individuals who can be linked directly or indirectly to preferential treatment, including hires that can be tied to a benefit for the organization, such as accompanying the awarding of a contract or agreement, obtaining permits, or other similar situations.
  - A process is in place to periodically assess existing relationships for change in circumstances or new related-party relationships.
- Sponsored travel:
  - Supporting documentation of requests for, approval of, and reimbursement or payment for sponsored travel is reviewed and directly tied to legitimate and approved business meetings, events, and activities.
  - Sponsored travel expenditures are reviewed periodically for compliance, including appropriateness of the travel, the business justification, and overall costs. Reviews include that business gifts and entertainment expenditures are within approved limits.
  - A reporting procedure for direct requests from third parties for sponsored travel to venues or destinations that do not include a legitimate business purpose.



- Sponsorships:
  - A policy highlights the situations or scenarios in which the organization could decide to sponsor one or more individuals, organizations, and/or institutions that may result in an operational benefit for the organization.
  - Due diligence procedures are in place to review and approve the proposed recipient(s) of a sponsorship, including verifying that sponsorships are paid to bona fide individuals and/or organizations that do not further distribute funds (such as middlemen or proxy organizations).
- F. Controls over third-party relationships prevent and detect corruption, especially regarding the potential for bribery and kickbacks. Established third-party controls may include:
  - Screening and contract reviews based on risk and prioritization of third-party relationships.
  - Onboarding procedures performed to limit corruption, such as:
  - Screening for denied parties or adverse media coverage.
  - Questionnaires to identify indicators of risk, such as how long the organization has been in business.
  - Verification of resources, expertise, and physical existence of third-party operations.
  - Contracts specify anti-corruption elements such as requiring adherence to laws and regulations and reporting acts of corruption, as well as clauses for termination due to nonconformance and the right to audit.
  - Criteria have been defined for identifying third parties and third-party agreements as high-risk for corruption, and processes are established to monitor those agreements. Examples include government-directed third parties such as agents, consultants, distributors, or business partners.
  - Verification procedures for documentation supporting that goods and services are actually delivered and/or completed as stated in the agreement.
  - High-risk third parties are periodically reassessed to determine if their original scope has changed or their risk level has risen.
- G. Ongoing monitoring and testing of operational processes susceptible to corruption, including:
  - Transaction monitoring and exception reporting, for indicators of improper payments.
  - Verifying the reliability of information collected and reported related to corruption.
  - Use of data analytics and related tools for conducting ongoing monitoring of transactions.
  - Specific actions or processes, such as:
    - Interactions with government officials to verify any alignment with organizational operations.



- Resulting actions from detection, reporting, or escalation processes.
  - Use of whistleblower hotlines, follow-through activities, and protections.
  - Response to regulatory changes and enforcement trends for alignment with international standards.
  - Cash and unusual payments, transfers to offshore accounts, fines and penalties paid, commission fees, and analysis of round-sum invoices.
  - Key performance measures to assess the effectiveness of established protocols.
  - Results of financial reporting, including any assessments provided by external assurance providers.
  - Extent of internal and external collaboration efforts and provided value.
- H. Incident response and reporting, including processes for:
- Remediation.
  - Enforcement standards.
  - Investigations.
  - Escalating incidents based on severity.
  - Post-incident reviews, including lessons from enforcement actions, and analyzing the root cause of incidents.
  - Initiating disciplinary and corrective actions across the organization fairly, consistently, and in compliance with legal requirements.
- I. Continuous improvement activities include ongoing evaluation of the anti-corruption program and activities such as periodic risk assessments, updates to training and policies, regular monitoring and testing of controls, and evaluation of lessons learned.



# Appendix A. Mapping the Requirements

The [International Chamber of Commerce \(ICC\) Rules on Combating Corruption](#) is a voluntary global standard for establishing anti-corruption measures, prohibiting illicit payments, and integrating compliance programs.<sup>3</sup> The ICC guidelines are widely accepted by global entities as a baseline standard and are recognized by other international organizations.

Governance Requirements	International Chamber of Commerce Rules on Combating Corruption
<p><b>A.</b> The board and senior management are committed to fighting corruption within the organization. The board approves and oversees an anti-corruption program established by senior management that features proactive, adaptive elements to address evolving risks, aligned with relevant regulations, organizational values, and risk management strategies. Senior management promotes integrity through a clear "tone at the top," rewarding ethical conduct and enforcing a zero-tolerance policy against corruption. If a formal anti-corruption program is absent, core compliance components such as training, reporting, discipline, and monitoring are in place to manage risks from corrupt interactions.</p>	<p>Article 1 – Prohibition of Corruption</p> <p>Article 11 – Elements of an effective Corporate Compliance Program: Commitment by Board and Management</p> <p>Article 11 – Elements of an Effective Corporate Compliance Program: Autonomy and Resources</p>
<p><b>B.</b> Policies and procedures are documented and established to define and assess anti-corruption activities. They cover ethics, whistleblowing, and other programs for the detection of inappropriate activities, reporting, and discipline. Policies define prohibited conduct such as improper gifts and conflict of interest, as well as establish procedures for working with third parties. Policies align with applicable regulatory and legal requirements and are periodically reviewed and updated as needed.</p>	<p>Article 11 – Elements of an Effective Corporate Compliance Program: Policies</p>
<p><b>C.</b> The organization’s anti-corruption management roles and responsibilities are defined. They detail leadership, ownership, and oversight responsibilities for the program, including raising concerns, investigating, and</p>	<p>Article 11 – Elements of an Effective Corporate Compliance Program: Autonomy and Resources; Human Resources Processes</p>

3. “ICC Rules on Combating Corruption,” International Chamber of Commerce, December 11, 2023, <https://iccwbo.org/news-publications/rules/icc-rules-on-combating-corruption/>.



<p>holding staff accountable for inappropriate activities. Policies and procedures address how concerns are communicated and investigated, identify who should be informed, and outline methods for confidential communication when necessary. Those responsible for the effectiveness of anti-corruption efforts have sufficient qualifications, training, seniority, authority, support, resources, autonomy, and access to the oversight body and to senior management.</p>	
<p><b>D.</b> Protocols for communicating with relevant stakeholders are defined, in alignment with jurisdictional laws, and include timely reporting on the status of the performance, risks, compliance, and reported allegations (specifically breaches of laws and regulations). In addition to the board and senior management, examples of relevant stakeholders include operations, risk management, compliance, legal, human resources, external investigators and assurance providers, law enforcement, information security, procurement, and others.</p>	<p>Article 11 – Elements of an Effective Corporate Compliance Program: Training and Communications; Communication Channels</p>
<p><b>Risk Management Requirements</b></p>	<p><b>International Chamber of Commerce Rules on Combating Corruption</b></p>
<p><b>A.</b> Processes for continuously identifying, assessing, reviewing, and managing corruption risks are standardized and comprehensive, include defined roles and responsibilities, and sufficiently address key risks relevant to the organization (such as strategic, reputational, ethical, operational, financial, trade compliance, geopolitical, and legal). Assessment of risks considers the organization’s jurisdiction and regulatory changes, the use of third parties, the types of goods and services the organization produces and exchanges, and public-facing interactions.</p>	<p>Article 3 – Risk-based Approach</p> <p>Article 11 – Elements of an Effective Corporate Compliance Program: Risk Assessment</p>
<p><b>B.</b> Risk responses are adequate and accurate based on the ranking and prioritization of risks. Responses are approved, implemented, reviewed, monitored, evaluated, and adjusted as needed.</p>	
<p><b>C.</b> Processes are in place to manage and, if necessary, escalate corruption issues that arise, ensuring accountability.</p>	<p>Article 2 – Reporting</p>
<p><b>Control Process Requirements</b></p>	<p><b>International Chamber of Commerce Rules on Combating Corruption</b></p>
<p><b>A.</b> An organizational anti-corruption program and/or compliance elements are adequately resourced, maintained, and together prevent,</p>	<p>Article 4 – Developing a Compliance Program</p>



detect, and correct actions that could lead to corruption.	
<b>B.</b> Anti-corruption policies and procedures are comprehensive, adequately tailored to the organization's risks, and maintained. These policies and procedures are clear, communicated, and accessible to all employees and relevant parties, and, along with ethical standards and organizational values, are integrated into the day-to-day operations of the organization. Specific policies and procedures exist to address the significant corruption risks identified in the introduction.	Article 11 – Elements of an Effective Corporate Compliance Program: Policies
<b>C.</b> Training and awareness programs are implemented, maintained, and required for all employees to build awareness of anti-corruption policies, procedures, and processes. The level and specificity of training are commensurate with the level of corruption risk associated with the position and duties.	Article 11 – Elements of an Effective Corporate Compliance Program: Training and Communications
<b>D.</b> Whistleblower programs or other complementary reporting mechanisms are in place to detect and prevent corruption attempts. Whistleblower channels are appropriately established and secured, as are protections for whistleblowers. Whistleblower procedures are in alignment with jurisdictional laws and regulations.	Article 11 – Elements of an Effective Corporate Compliance Program: Whistleblowing Programs
<b>E.</b> The organization has implemented sufficient internal controls to more easily identify and help prevent corruption, such as enforcing segregation of duties; establishing appropriate approval levels for transactions or activities; reviewing and maintaining required documentation; setting aside specific general accounts for the recording of certain transaction types (such as gifts, donations, and sponsorships). Specifically for financial processes, internal controls are in place to help ensure that the organization's financial records and supporting documentation are fairly and accurately represented and that transactions are properly recorded.	Article 6 – Political and Charitable Contributions and Sponsorships Article 7 – Gifts and Hospitality Article 8 – Conflicts of Interest Article 9 – Financial Reporting and Accounting Article 10 – Internal and External Collaboration Article 11 – Elements of an Effective Corporate Compliance Program: Financial Reporting and Accounting
<b>F.</b> Due diligence protocols and control activities are established over third-party relationships, including vendors, suppliers, contractors, subcontractors, outsourced service providers, other agencies, and consultants.	Article 5 – Third Parties Article 11 – Elements of an Effective Corporate Compliance Program: Due Diligence
<b>G.</b> Ongoing monitoring and regular testing of operational processes susceptible to corruption and controls are conducted, and that anti-corruption program elements are working as	Article 11 – Elements of an Effective Corporate Compliance Program: Monitoring and Auditing



intended, including verifying the reliability of information.	
<p><b>H.</b> Incident response, reporting, and remediation protocols are established, including enforcement standards, investigation protocols, severity-based escalation processes, post-incident reviews, and root cause analysis. Organizations review lessons learned from enforcement actions and initiate disciplinary and corrective actions. Enforcement activities are applied consistently, comply with legal requirements, and ensure fair and equitable treatment across the organization.</p>	<p>Article 2 - Reporting</p> <p>Article 11 - Elements of an Effective Corporate Compliance Program: Corrective Action and Disciplinary Measures; External Reporting</p>
<p><b>I.</b> Practices exist to help prevent future occurrences and support an environment of continuous improvement, such as analysis of enforcement activities for lessons learned.</p>	<p>Article 11 - Elements of an Effective Corporate Compliance Program: Continuous Improvement -</p>

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## Appendix B. Anti-Corruption References

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These references of key global fraud and corruption guidance, standards, legislation, and best practices were used to draft this Topical Requirement and User Guide.

- COSO ERM Fraud Risk Management Guidelines, March 2023.
- Foreign Corrupt Practices Act (FCPA) Guidelines – Second Edition, July 2020.
- U.S. Department of Justice (DOJ) Evaluation of Corporate Compliance Programs (ECCP), September 2024.
- Corporate Compliance Program Elements (DPA).
- UK Bribery Act (UKBA) Guidance, March 2011.
- France Anticorruption Agency (AFA) Guidelines, December 2020.
- ISO-37001: Antibribery Management Systems, 2025.
- OECD: Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, December 2021.
- ICC International Chamber of Commerce Rules on Combating Corruption, 2023.
- United Nations Convention Against Corruption, May 2026.
- United Nations Office on Drugs and Crime and United Nations Global Compact, An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide (New York: United Nations, 2026).

In addition to the resources on this list, internal auditors should refer to local jurisdictional regulations for further guidance and alignment.



### About The Institute of Internal Auditors

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