

Get What You Need Out of Your Gift, Entertainment and Travel (GET) Policy and Approval System

GET



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Tuesdays with Bernie Episode – La Trivi-ata

S1EP05 - La Trivi-ata (Anti-Trust: Bribery and Gifts):

[Start Video](#)



Objectives

- Why Does GET Matter?
- Developing a GET Policy
- GET Registration and Approval System
- Vended Solution or Internal Platform
- Customization to Rollout
- Monitoring and Reconciliation
- Lessons Learned



Why Does GET Matter?

- Creates transparency:
 - Types of GET, value, frequency, business purpose, government affiliation, avoid conflicts of interest
- Helps ensure compliance with:
 - Anti-corruption laws, including U.S. federal, state, and local gift laws
 - FCPA, the UKBA, and the anti-corruption laws of other countries, where companies conduct business



Developing a GET Policy

- Assess Your Risk
- Meet with Stakeholders
- Determine Approval Thresholds
- Establish Requirements
- Identify Exceptions
- Develop GET Resource Guide / FAQ
- Online or In-Person Training
- Consequences of Non-Compliance



GET Registration and Approval System

- Business Requirements and Budget
- Approval Workflow
- Search Criteria and Reporting
- Testing
- Communication
- Delegating Approvals
- System Quick Reference Guide



Vended Solution or Internal Platform

Vended

- Limited Customization
- Short Implementation
- External Hosting
- References Available
- Contractually-Bound
- Cost May Increase



Internal

- Fully Customizable
- Long Implementation
- Internal Hosting
- Onsite Support
- Costs May Remain Level

Customization to Rollout

Design

- Project Scope
- Budget
- Business Requirements
- GET Type Multi- Select
- Attachments
- Search Fields
- Reports
- Currency-Converter
- Interface with Expense System

Customize

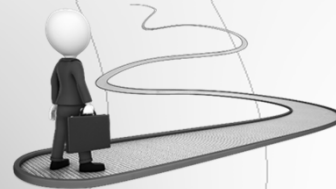
- Solution Requirements
- Approval Tiers
- Workflow:
 - Initiating Event
 - Recipient
 - Action
 - Terminating Event
- Delegating Approvals
- Deleting
- Cloning
- Unlocking
- Cancelling
- Adding additional information
- Email Notification

Test

- Identify Testers
- Allocate Time
- Develop Testing Script

Rollout

- Reference Materials:
 - System Quick Reference Guide
 - GET Policy Resource Guide
 - Thresholds Chart
 - Infographic
- Training:
 - Information Sessions
 - Online Training
- Communications



Post-Rollout: Monitoring and Reconciliation

Monitor

- Establish Controls
- Develop Monitoring Process
- Daily System Activity
- Periodic Reporting
- Audit Findings
- Hotline Matters
- Identify Trends

Reconcile

- Reconcile Against Controls
- Develop Reconciliation Process
- Research Variances
 - Travel and Expense System
- Document Exceptions
- Consequences of Non-Compliance



Lessons Learned

- Policy Evolution
- Threshold Adjustments
- System Corrections
- Workflow Changes
- Business Requirements
- Integration of GET System and Travel and Expense System
- Ongoing Training



