

CEP Magazine - August 2018 How's your fourth-party due diligence?

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Please feel free to contact me anytime to share your thoughts.

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One of many fascinating aspects of the recent Panasonic Avionics Foreign Corrupt Practices Act case concerns the vetting of third parties. Bribes are often paid through third parties like vendors or other intermediaries. An important aspect of any anti-bribery compliance program is the performance of due diligence prior to working with third parties. A strong third-party due diligence process may detect shell companies or other signs of a suspicious vendor before the corrupt activity has a chance to take place.

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