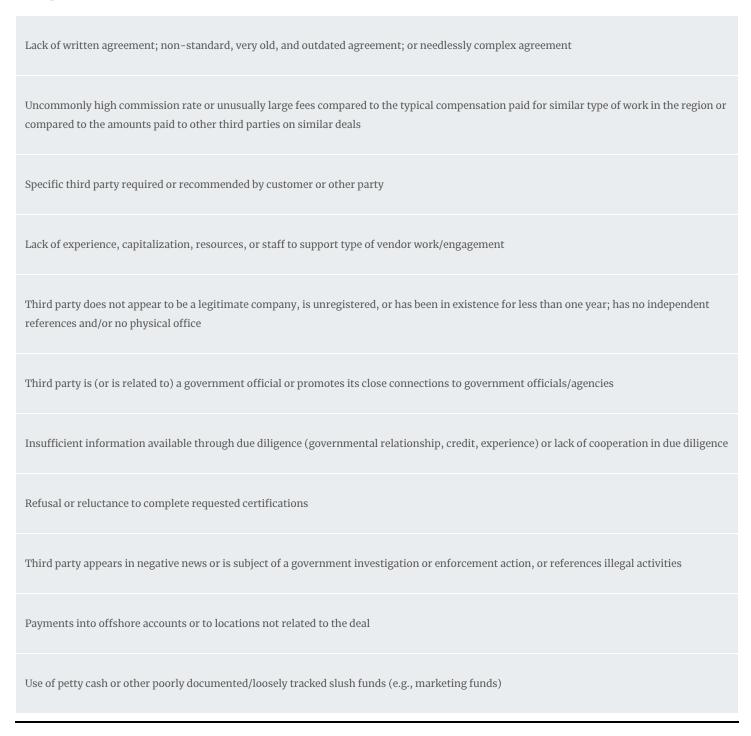


Corporate Compliance Forms and Tools Common Red Flags Indicating Heightened Potential for Corruption

Below is a list of potential red flags to look for when reviewing a transaction for corruption risk. While this list should not be considered exhaustive, it should provide a good starting point for assessment of relative corruption risk.



Inadequate, generic, or otherwise questionable descriptions of activities; requests for changes to invoices or documents
Missing or incomplete documentation
Repetitive payments of same amount or round dollar amounts
Substantial large-dollar transactions for a new vendor
Delegation of work by third party to multiple agents or subcontractors
Invoices paid too quickly; payments in cash or check, payments in advance
Large individual or aggregate payments/benefits to one payee
Repetitive entertainment/dinner/travel/gifts or requests for the same, or requests for donations and contributions
Employees being paid who are not listed in recent company phone book or who receive no benefits, tax withholding.

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