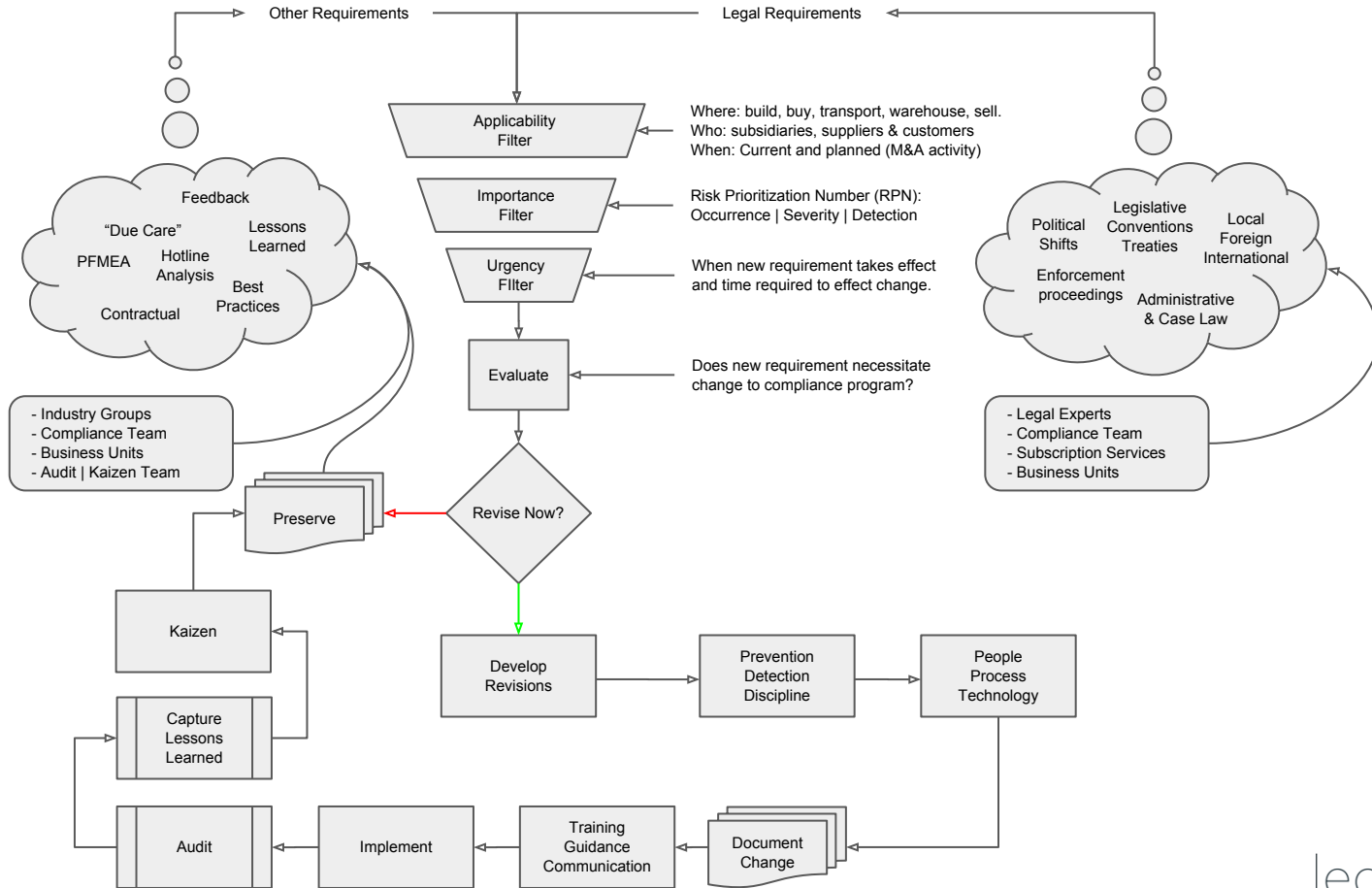
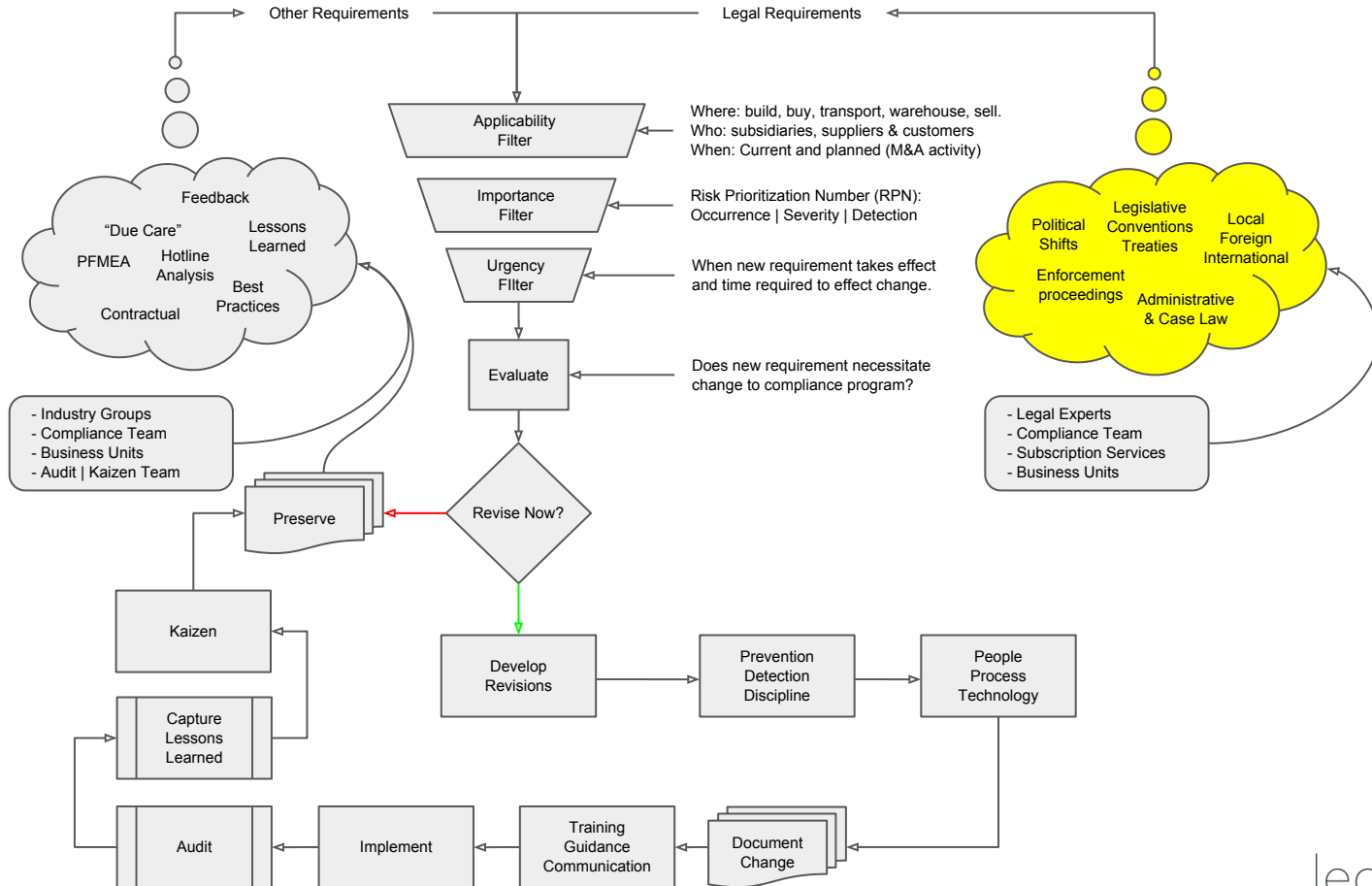


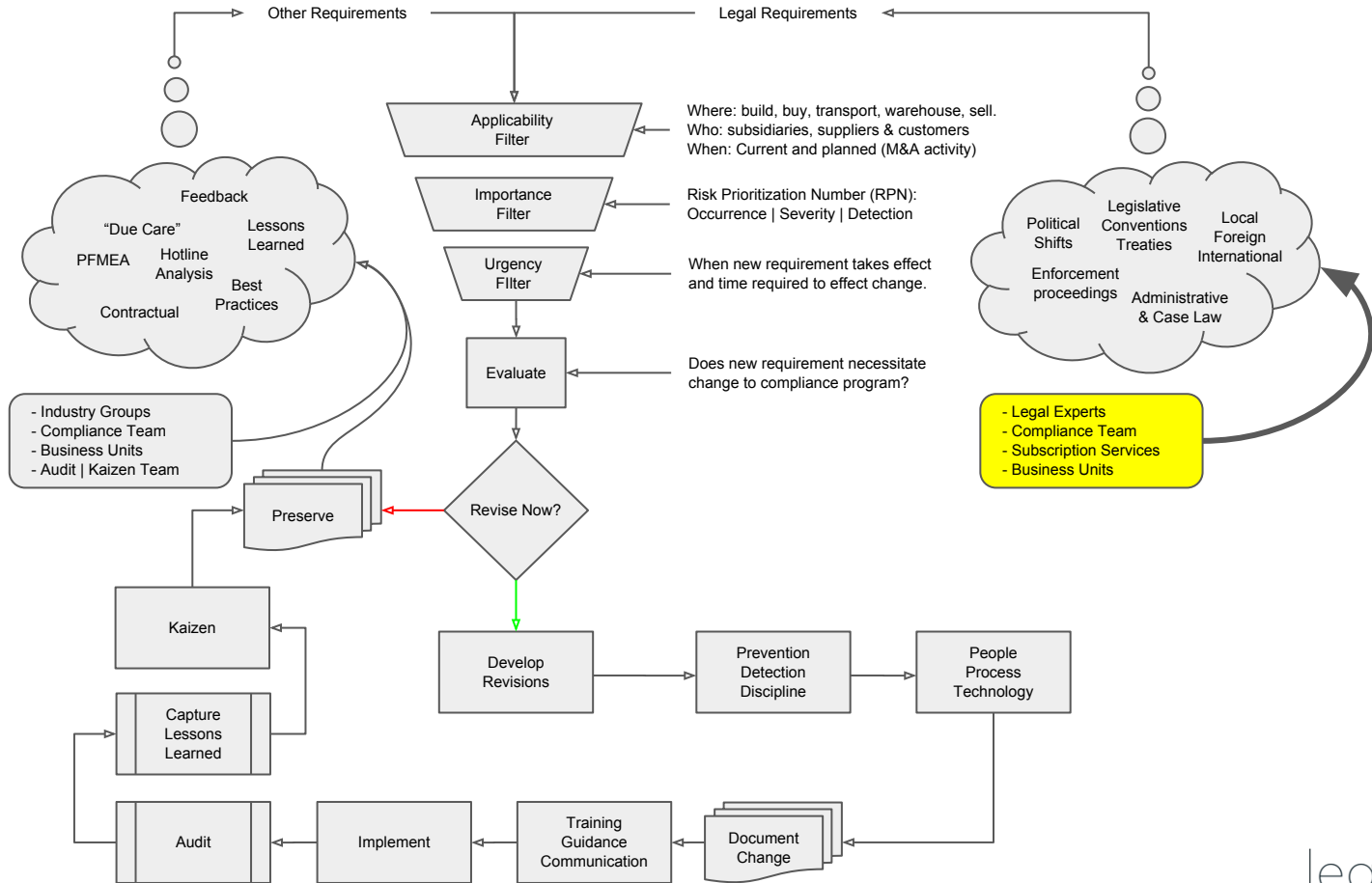
Global Anti-Corruption Program Continuous Improvement



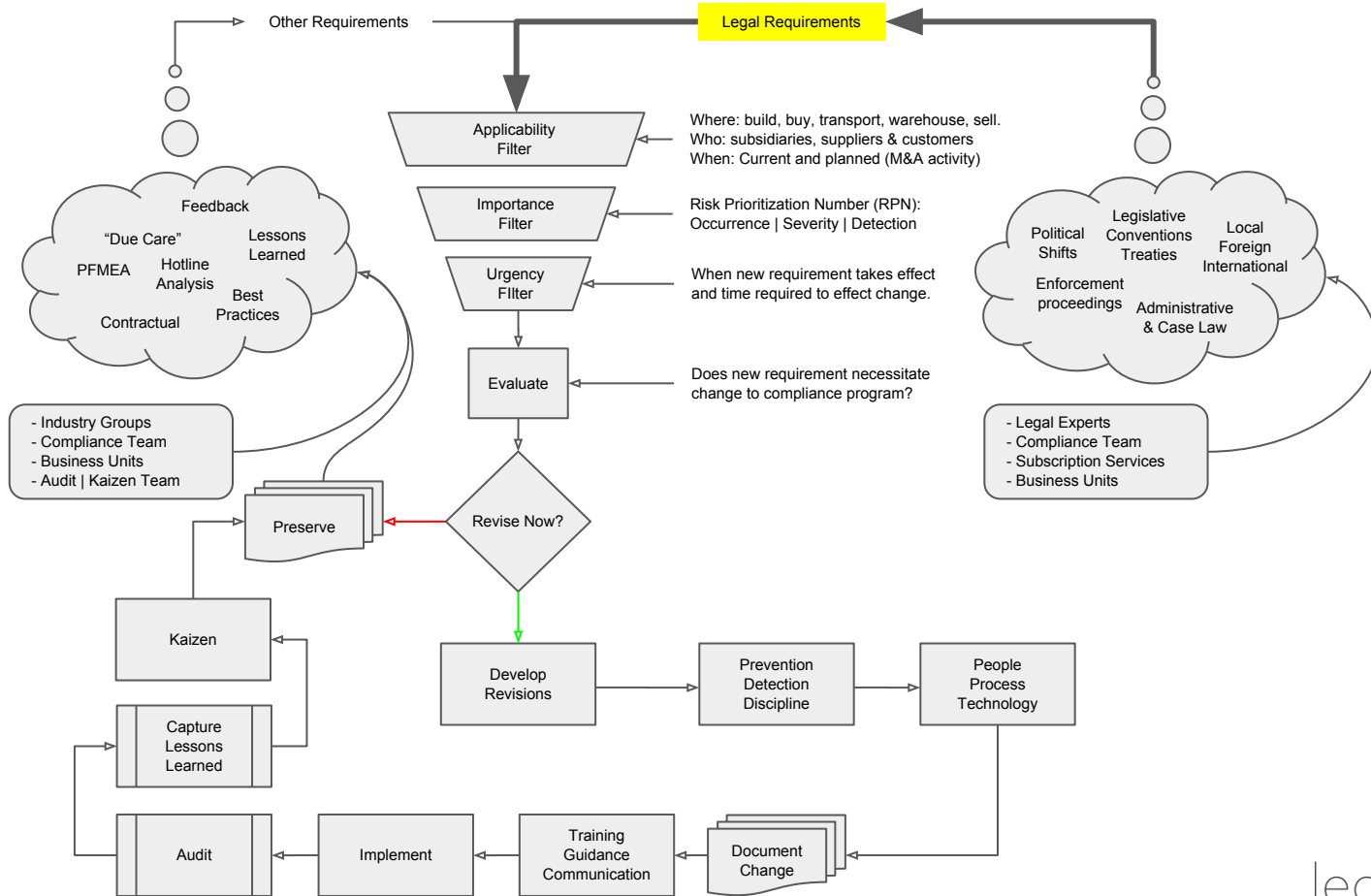
(1) Monitor Potential New Legal Requirements



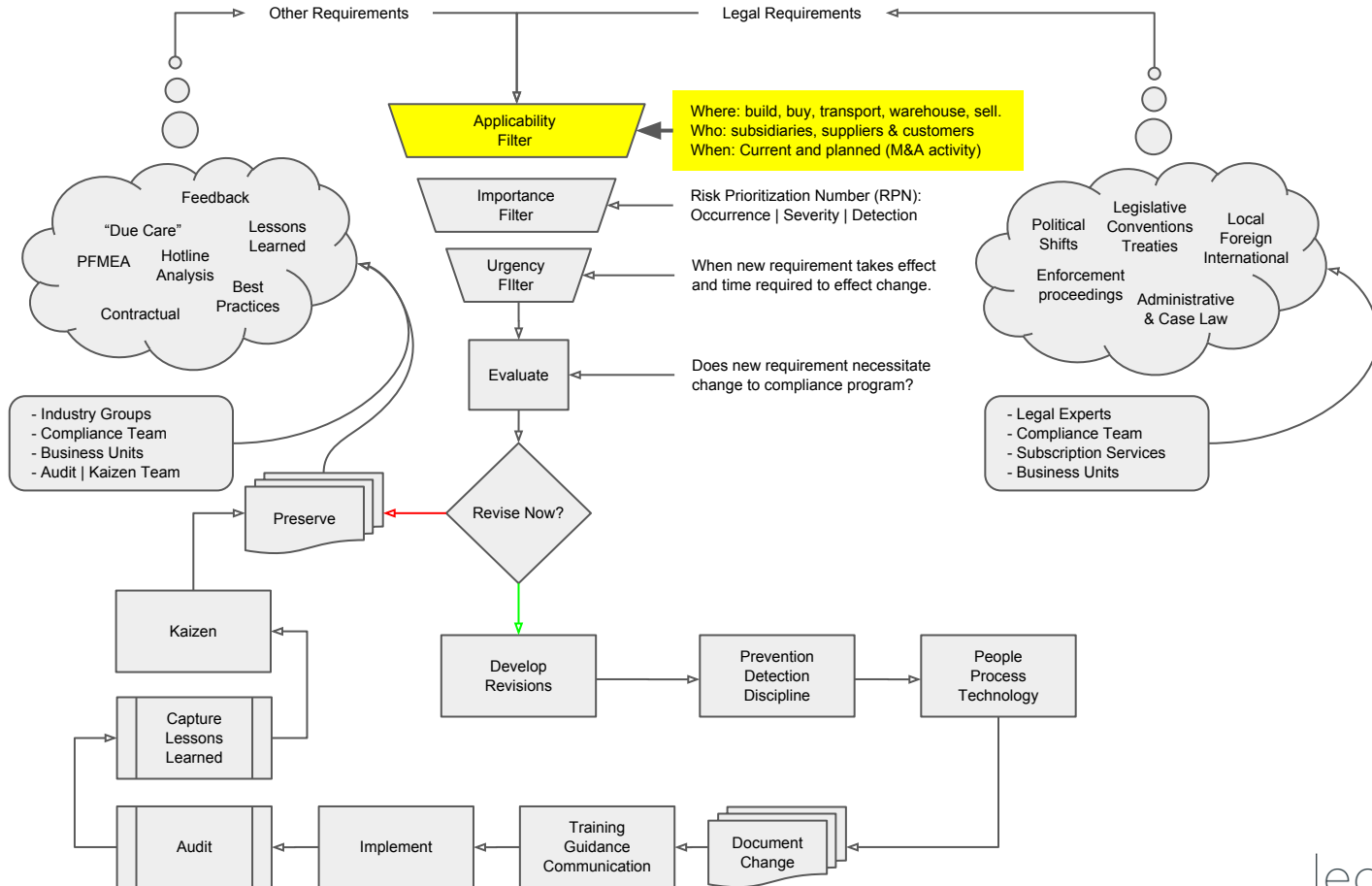
(2) Use Subscription Services, etc.



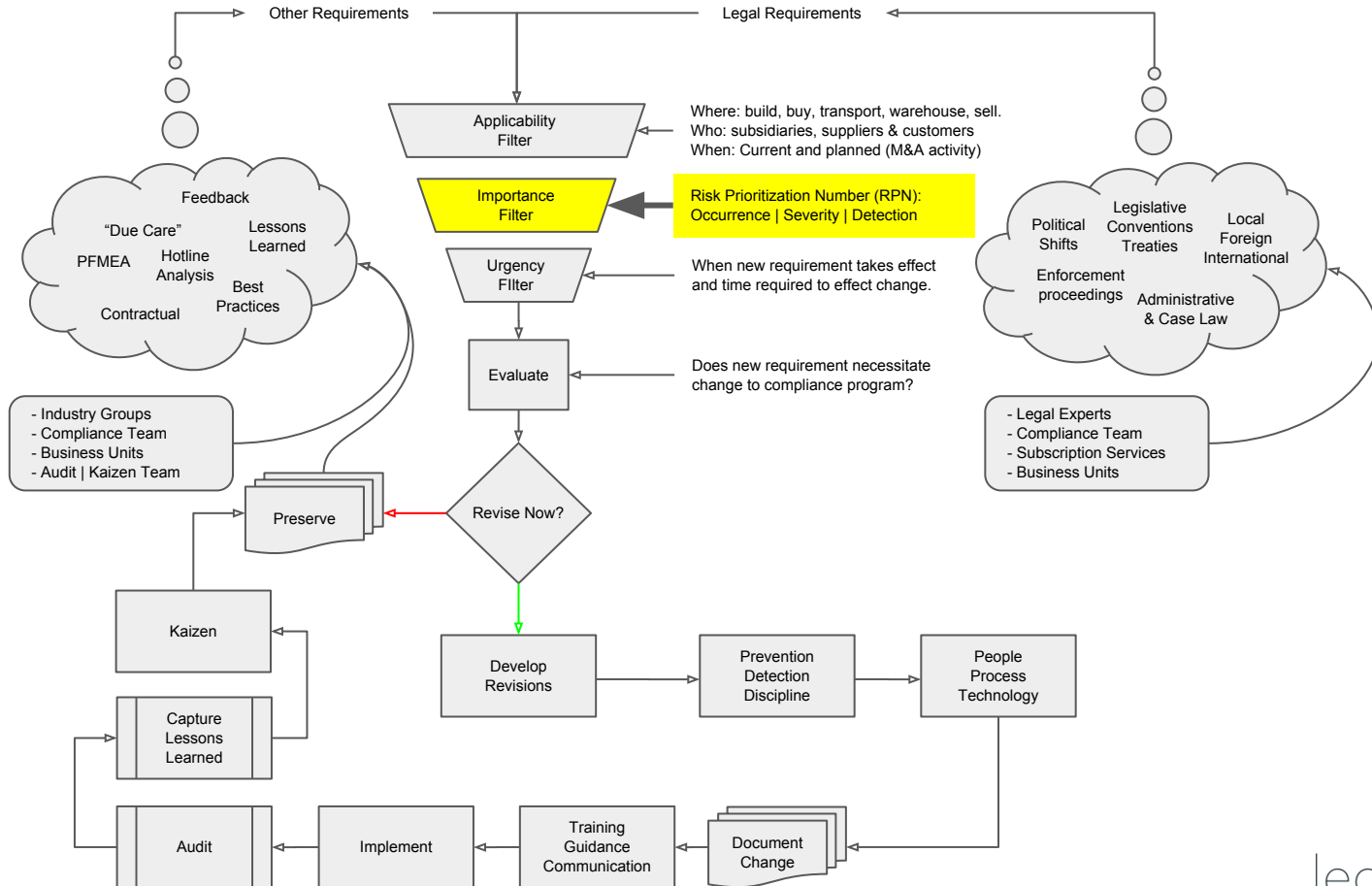
(3) Gather Potential Legal Requirements



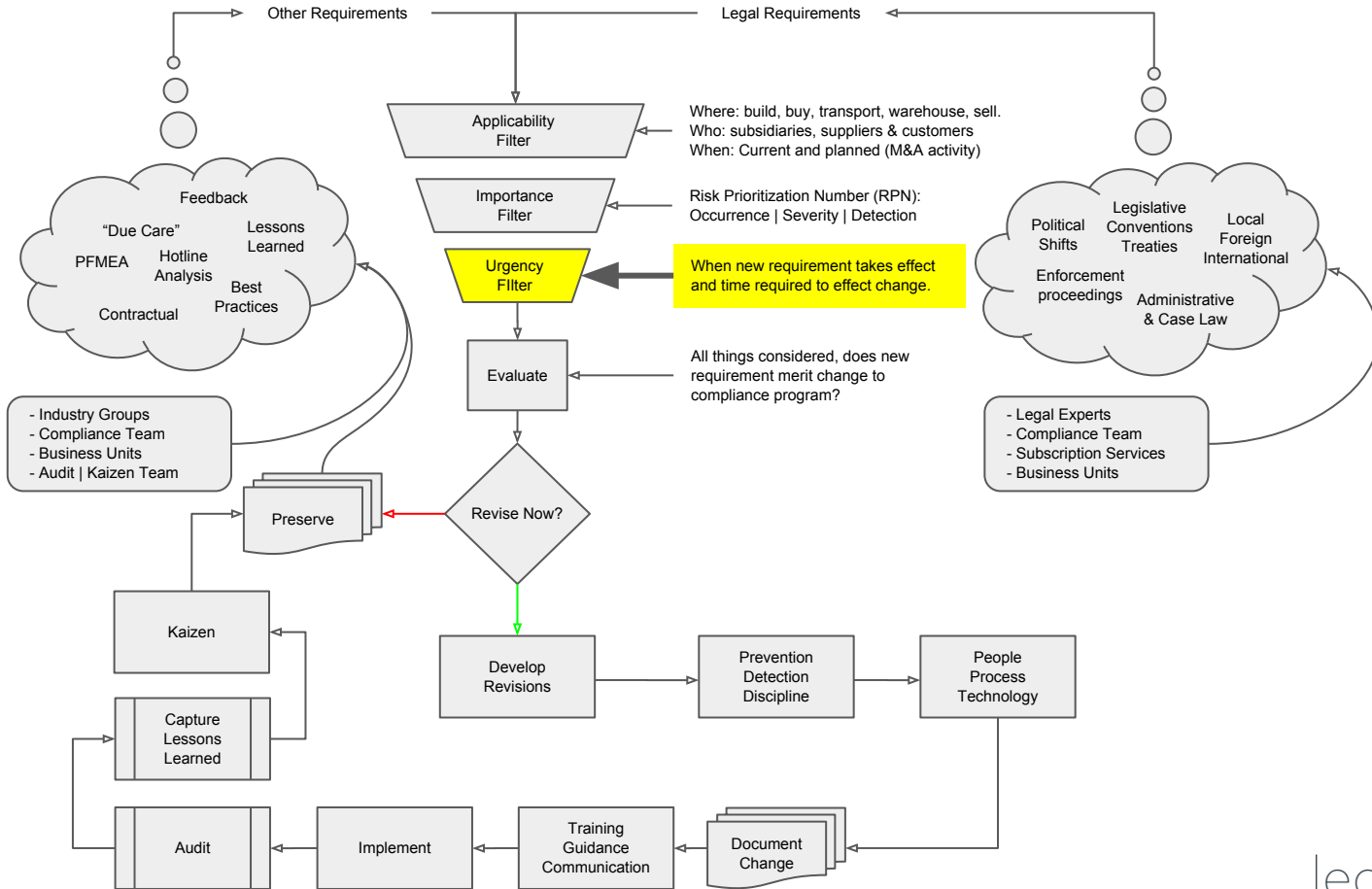
(4) Filter for Applicability



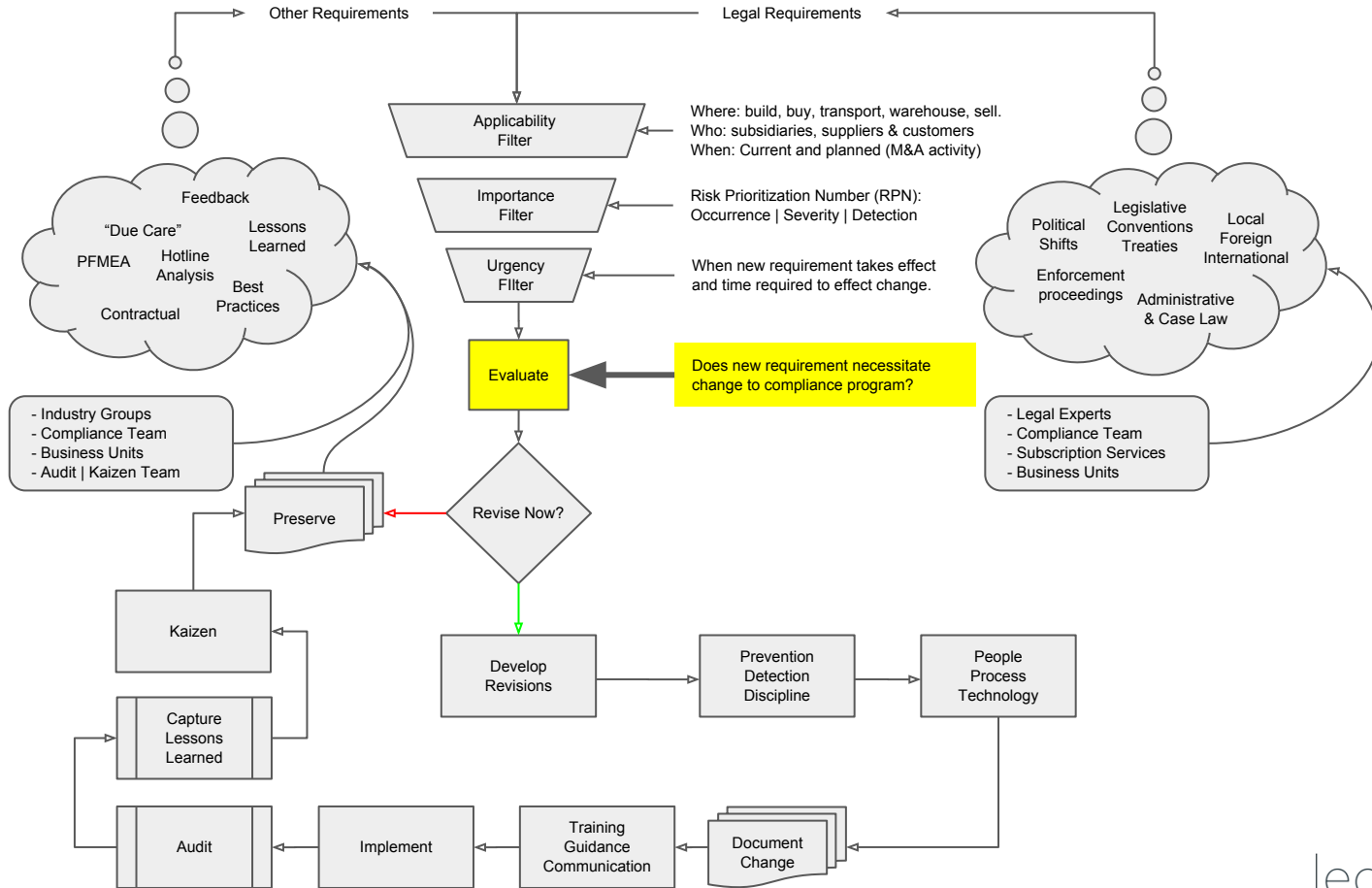
(5) Filter for RPN



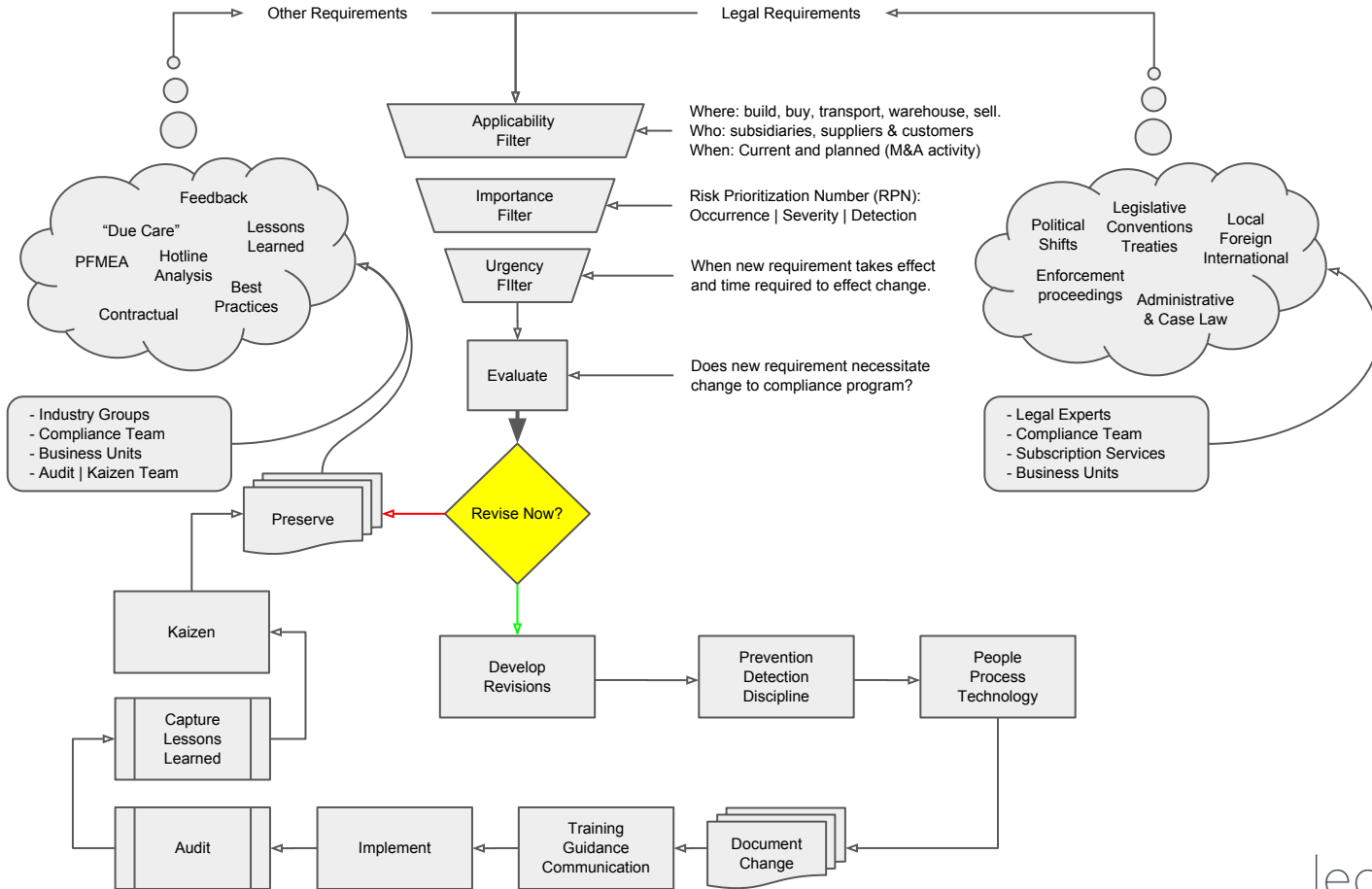
(6) Filter for Urgency



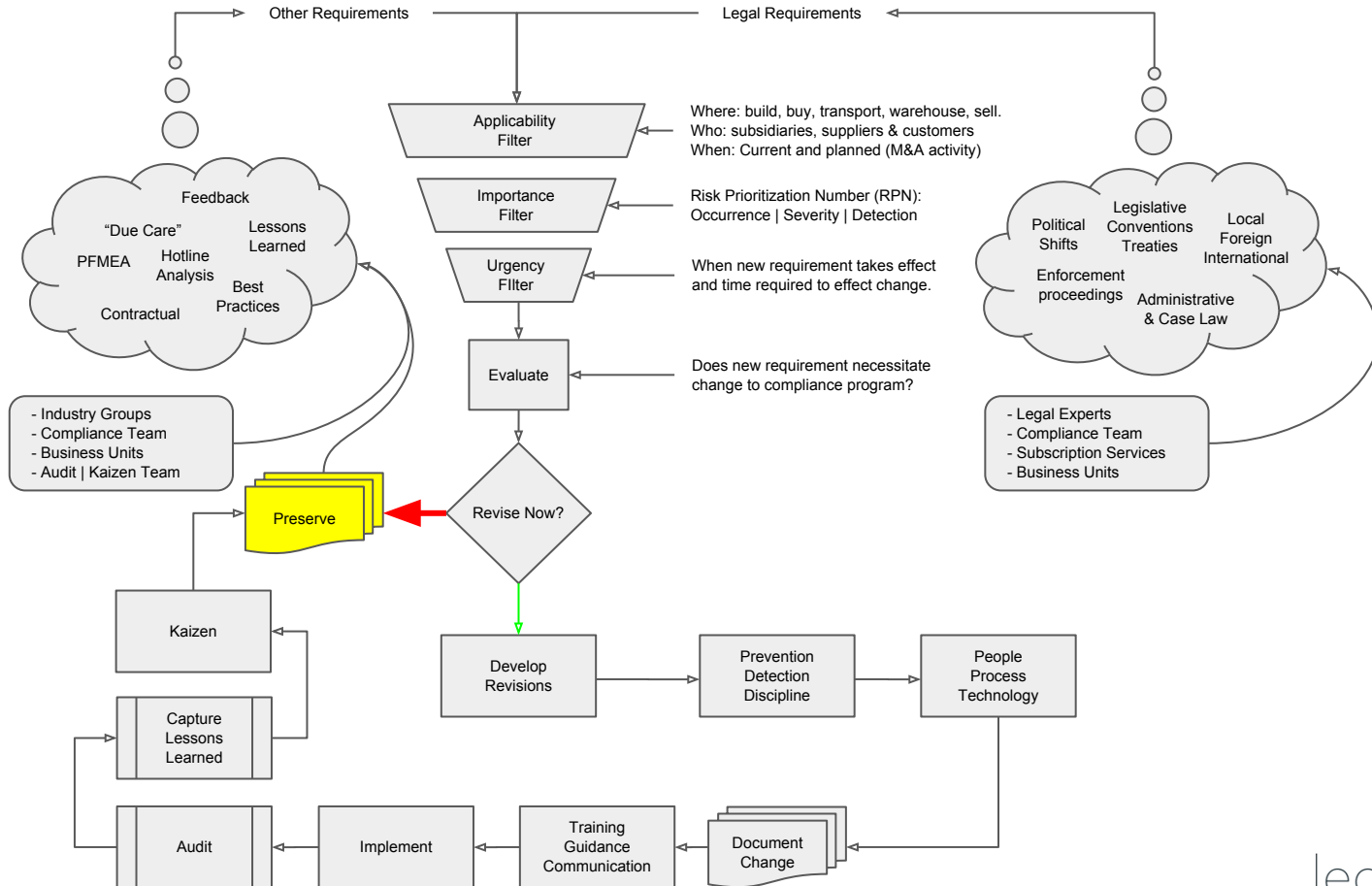
(7) Closer Evaluation of Reduced Volume



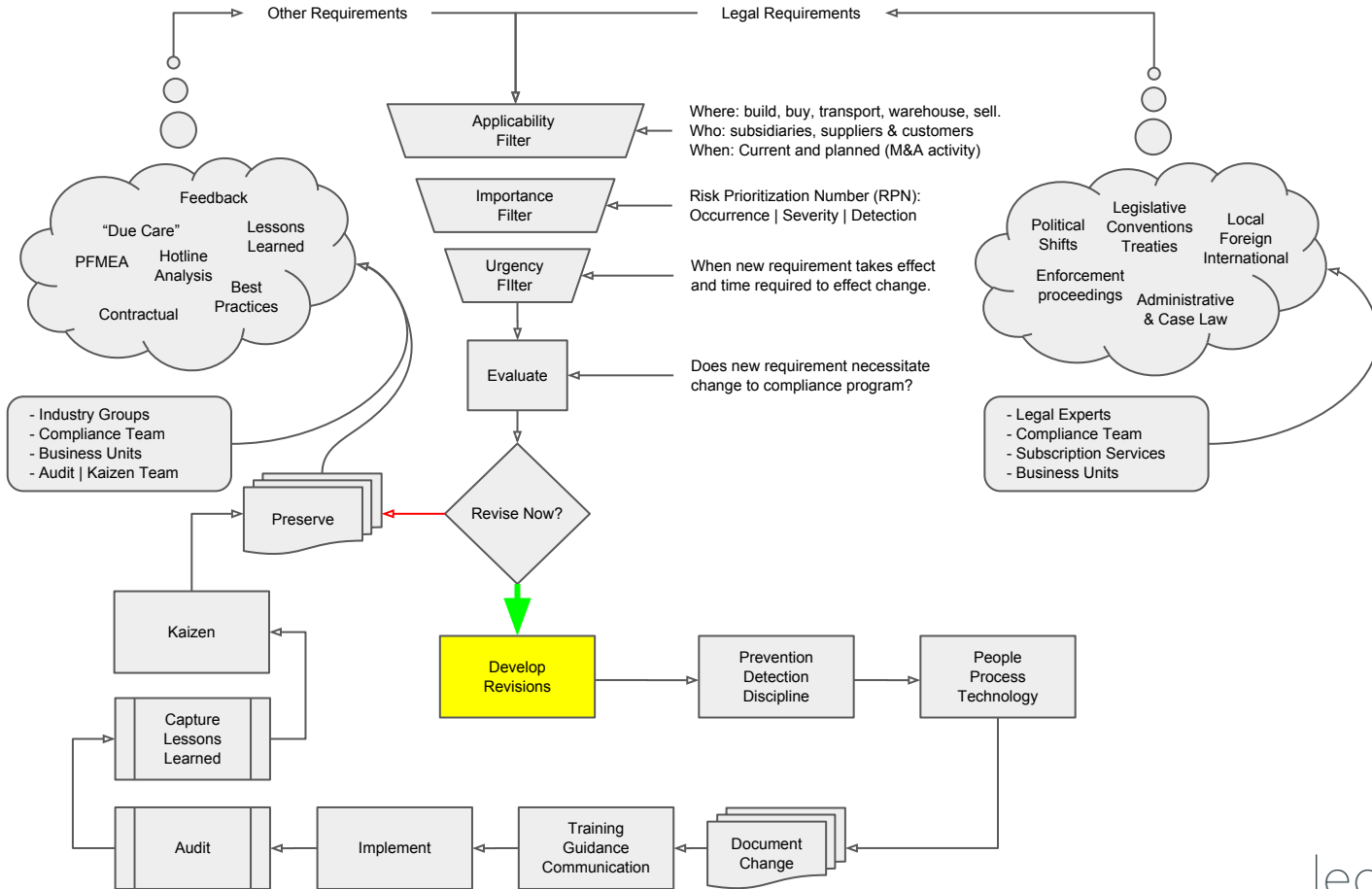
(8) Decide Whether to Revise Program Now



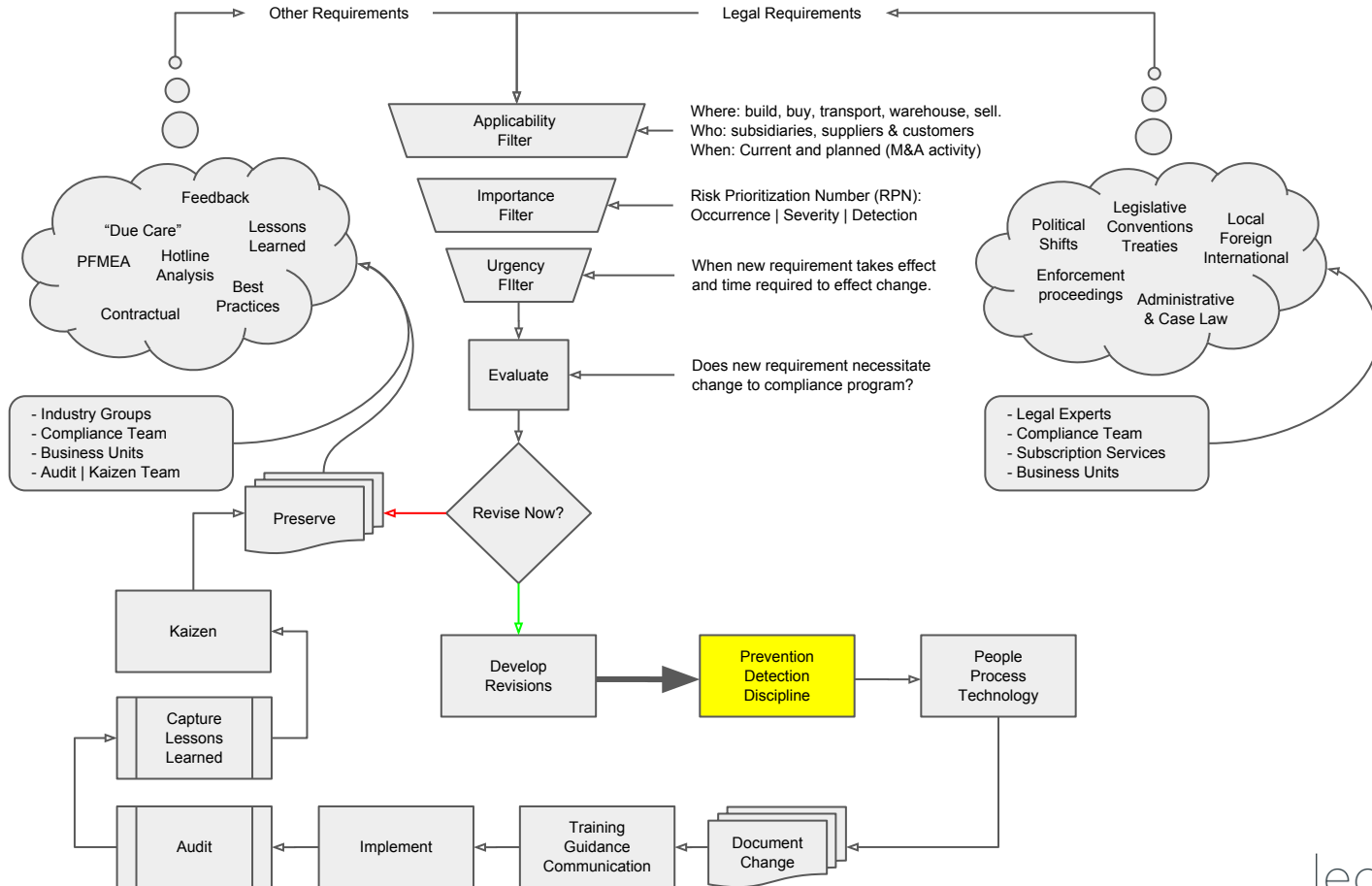
(9) If Not Revising Now, Preserve Work



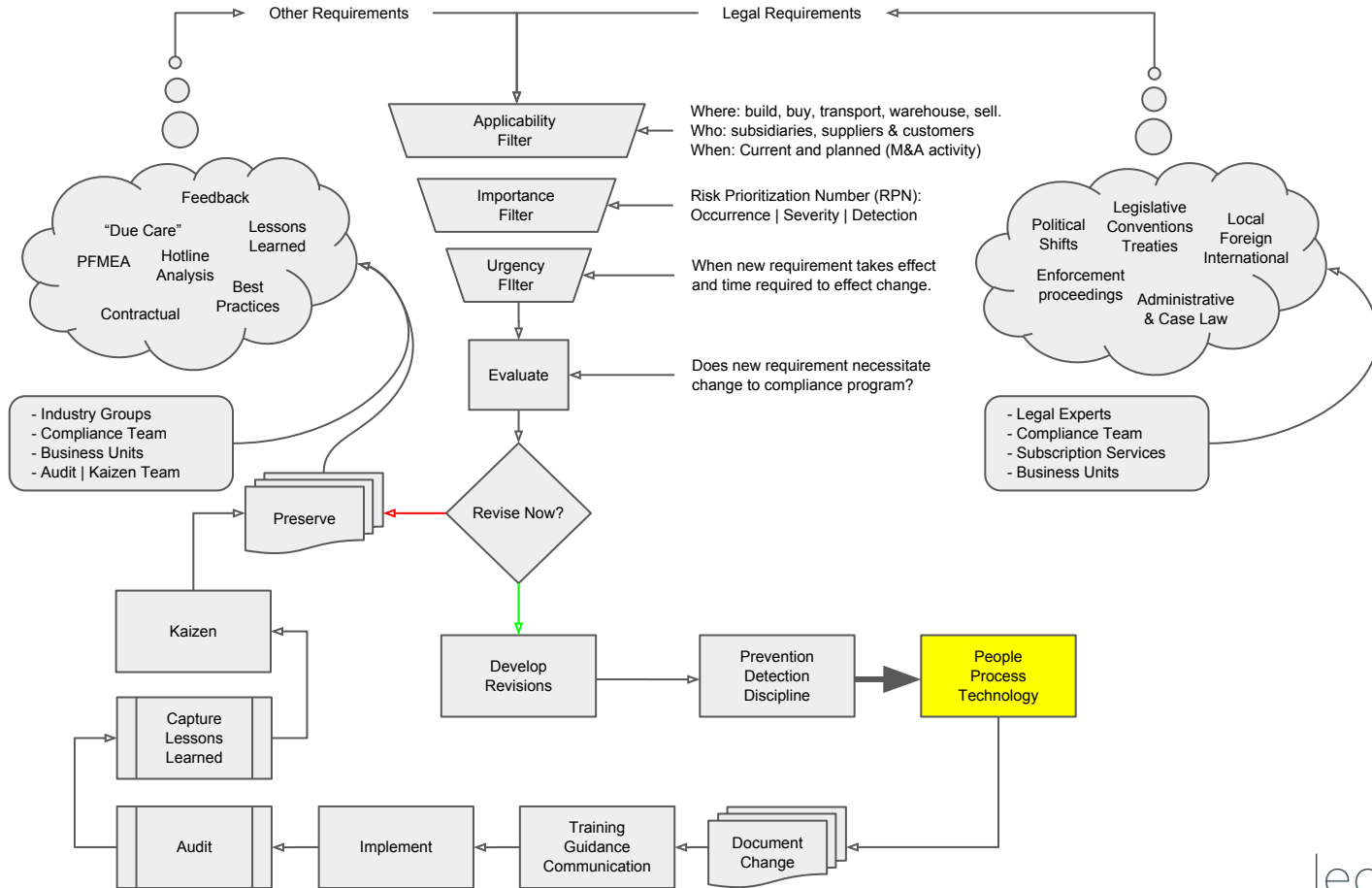
(10) Revise Program Per New Requirements



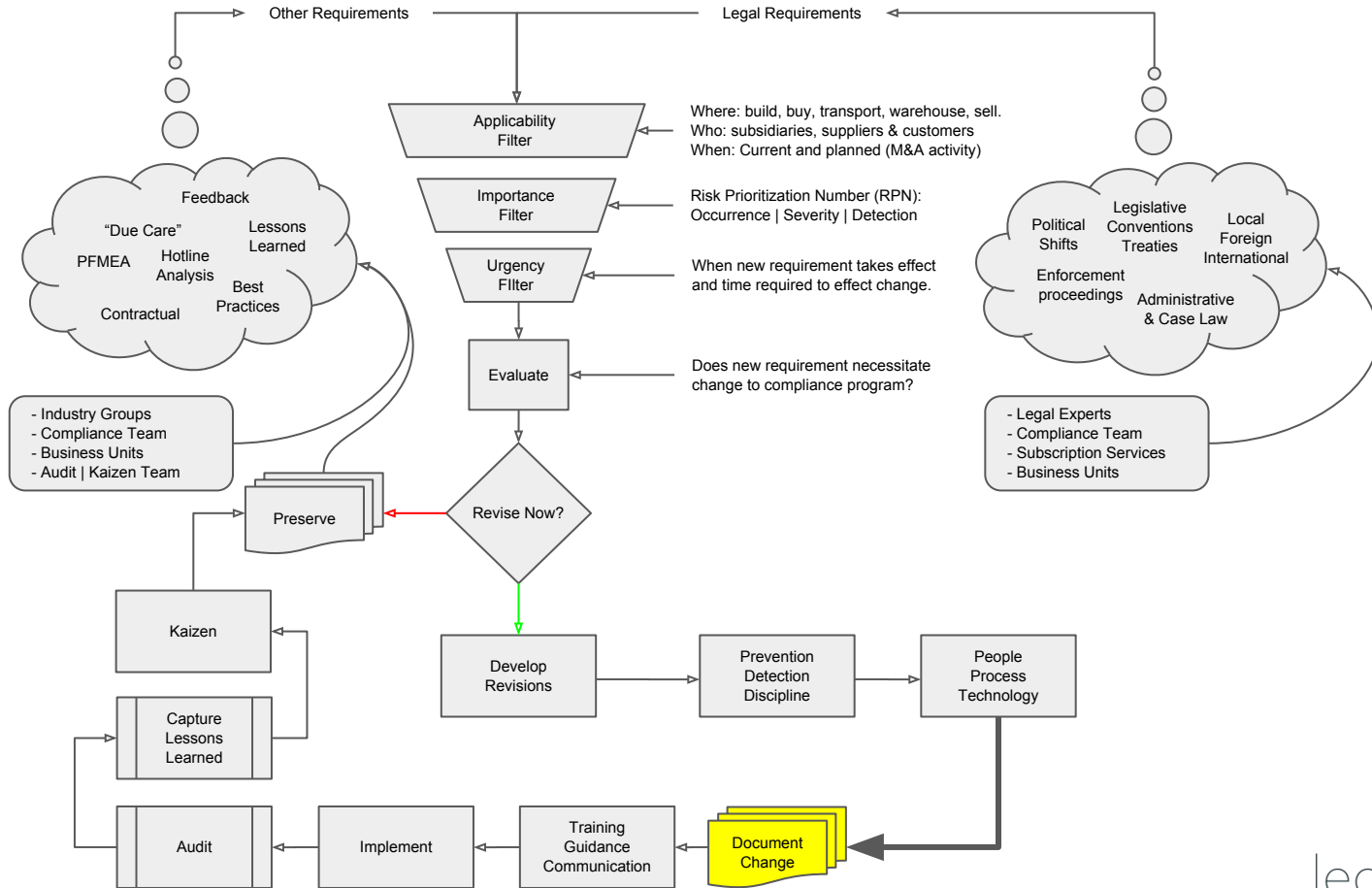
(11) Apply to All Phases as Appropriate



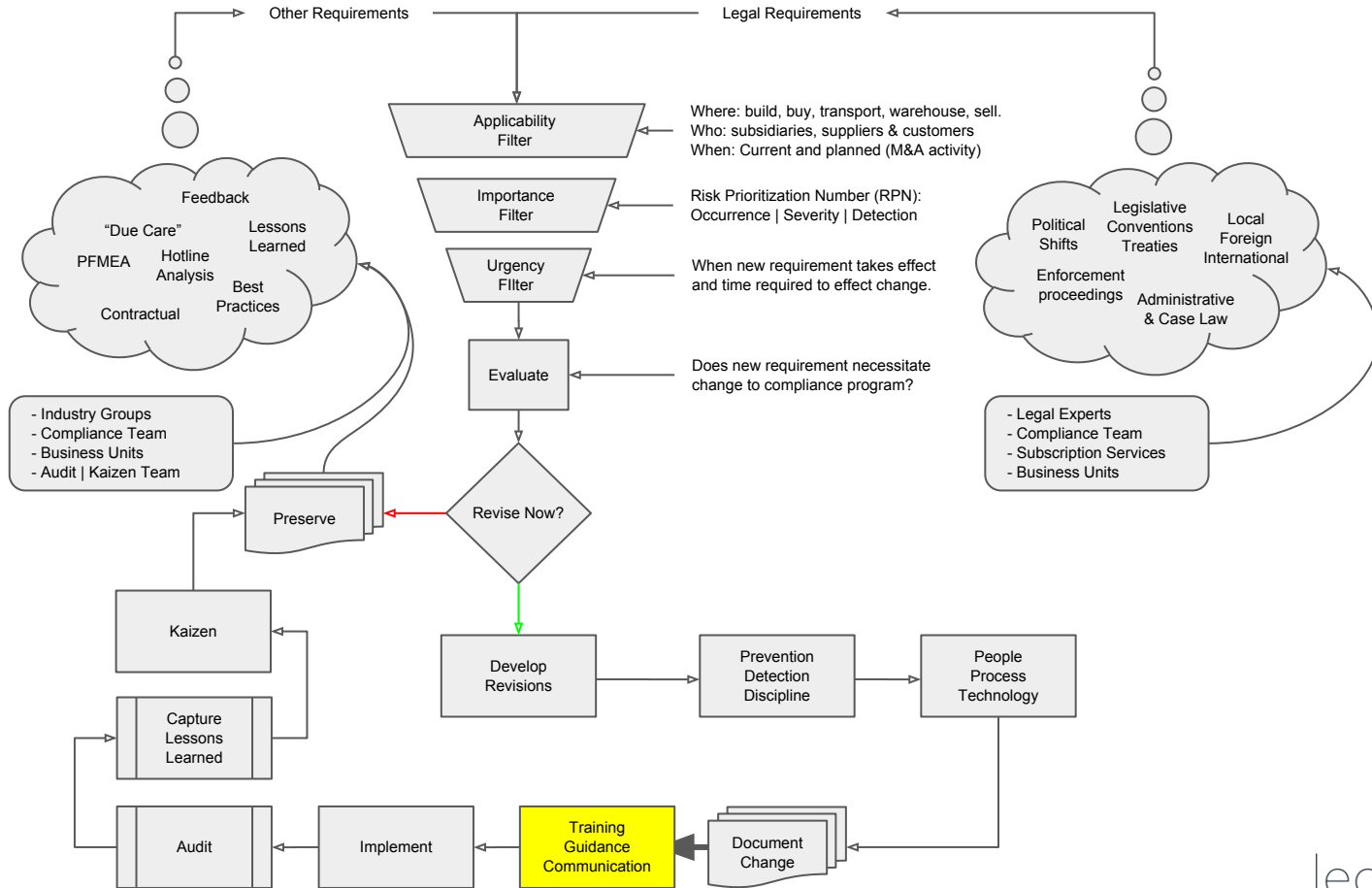
(12) People 1st, Process 2nd, Technology 3rd



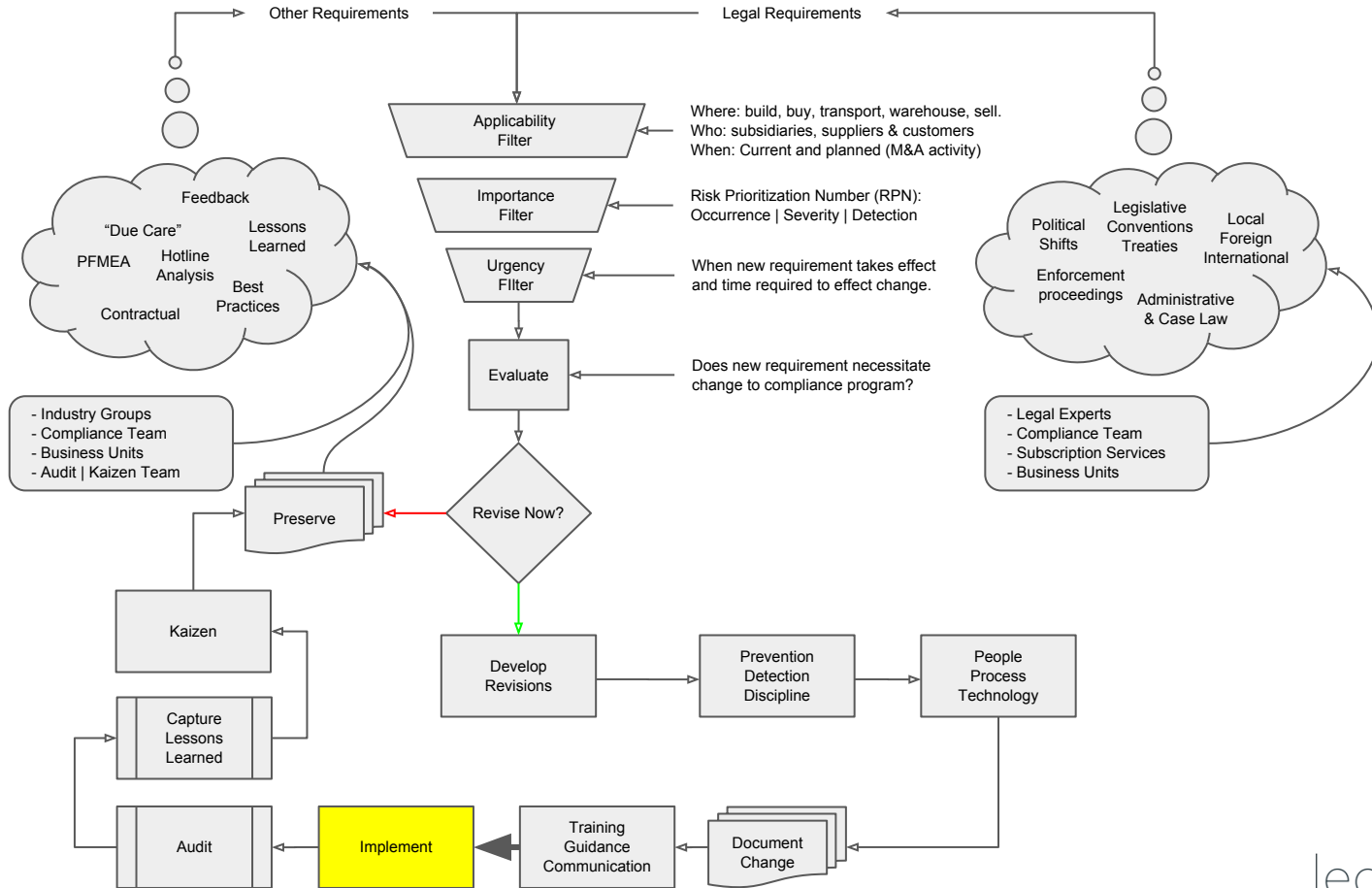
(13) Document Revised Process



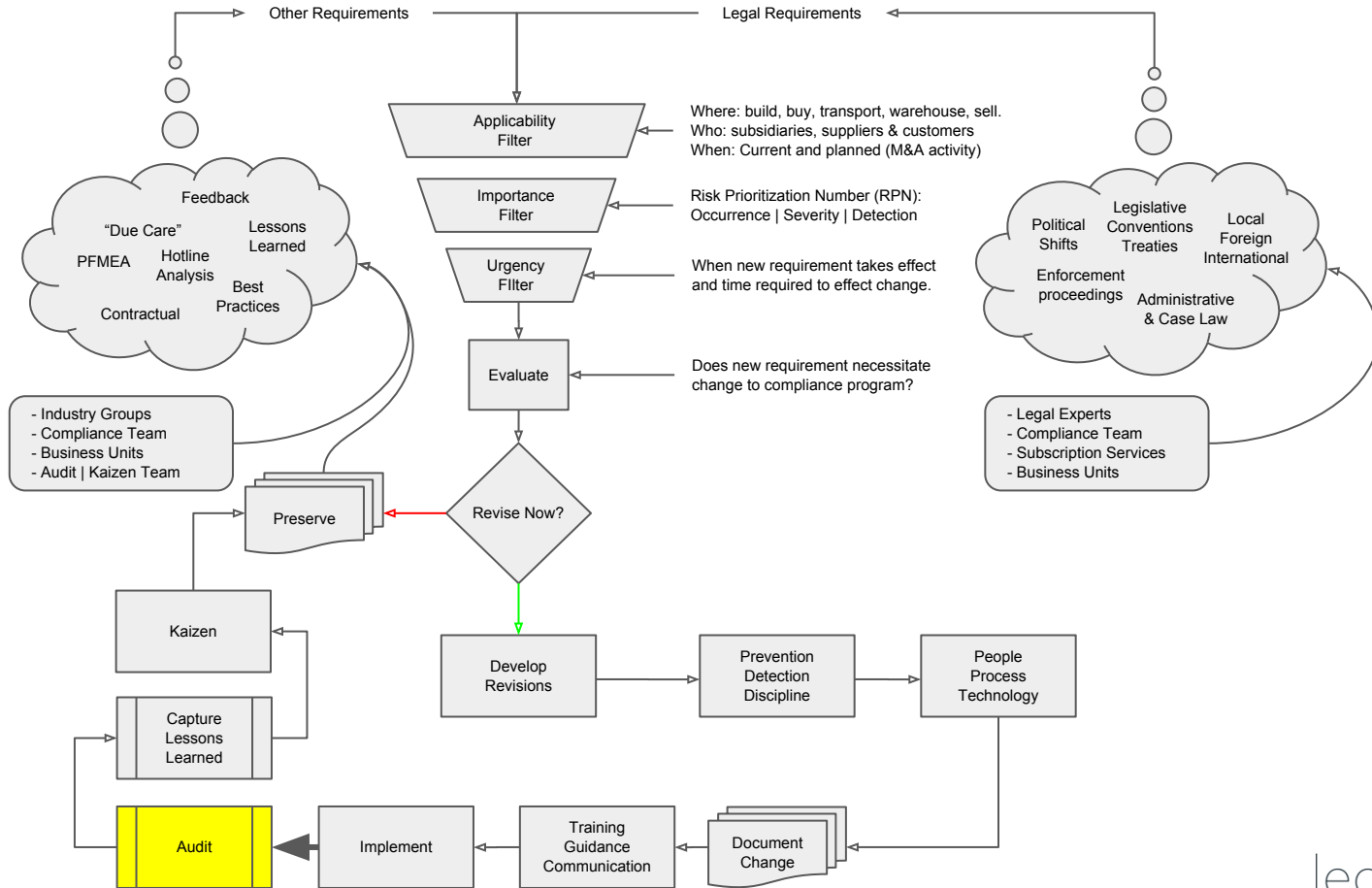
(14) Prepare to Implement Revisions



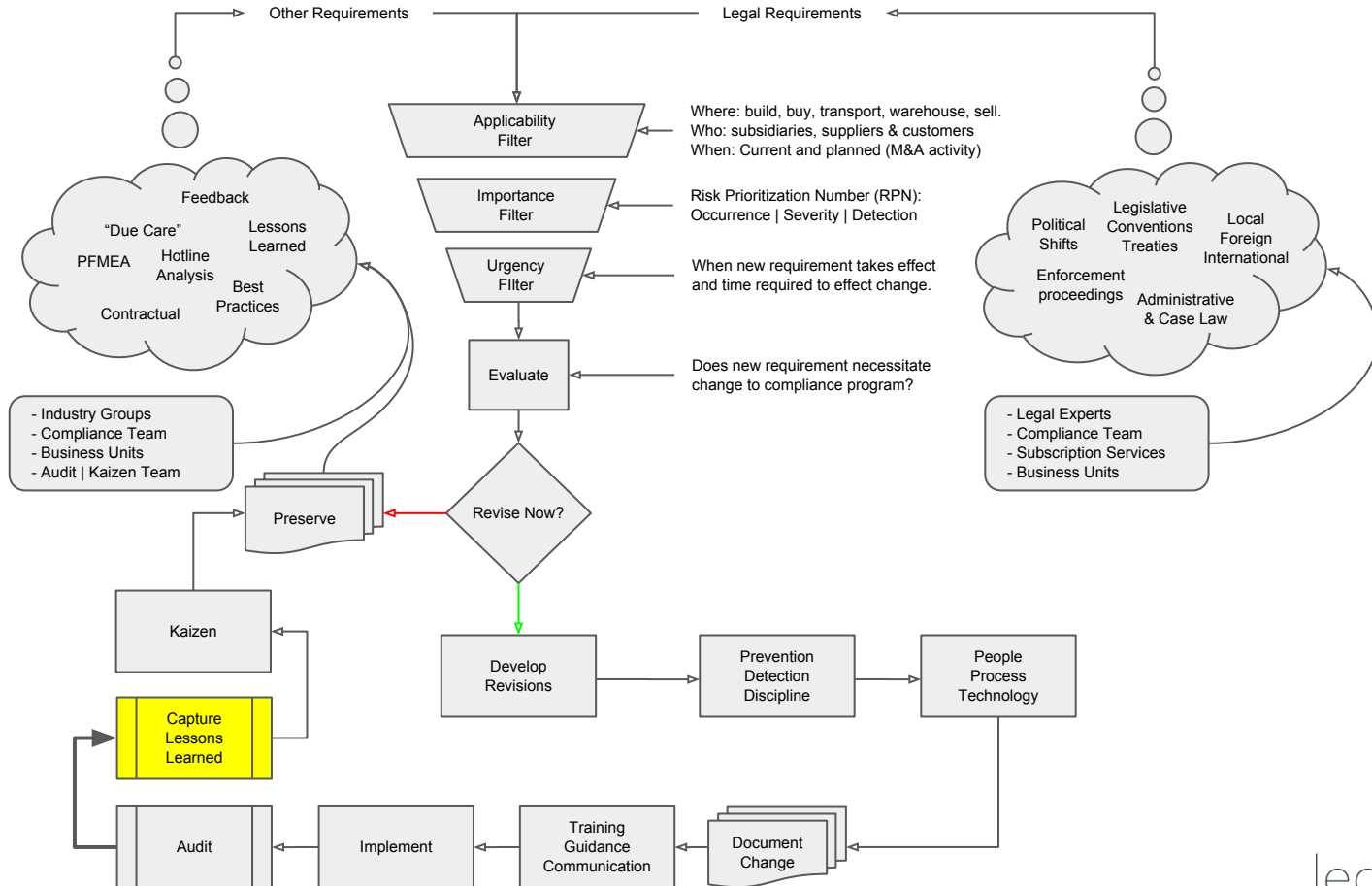
(15) Roll Out Implementation (test market)



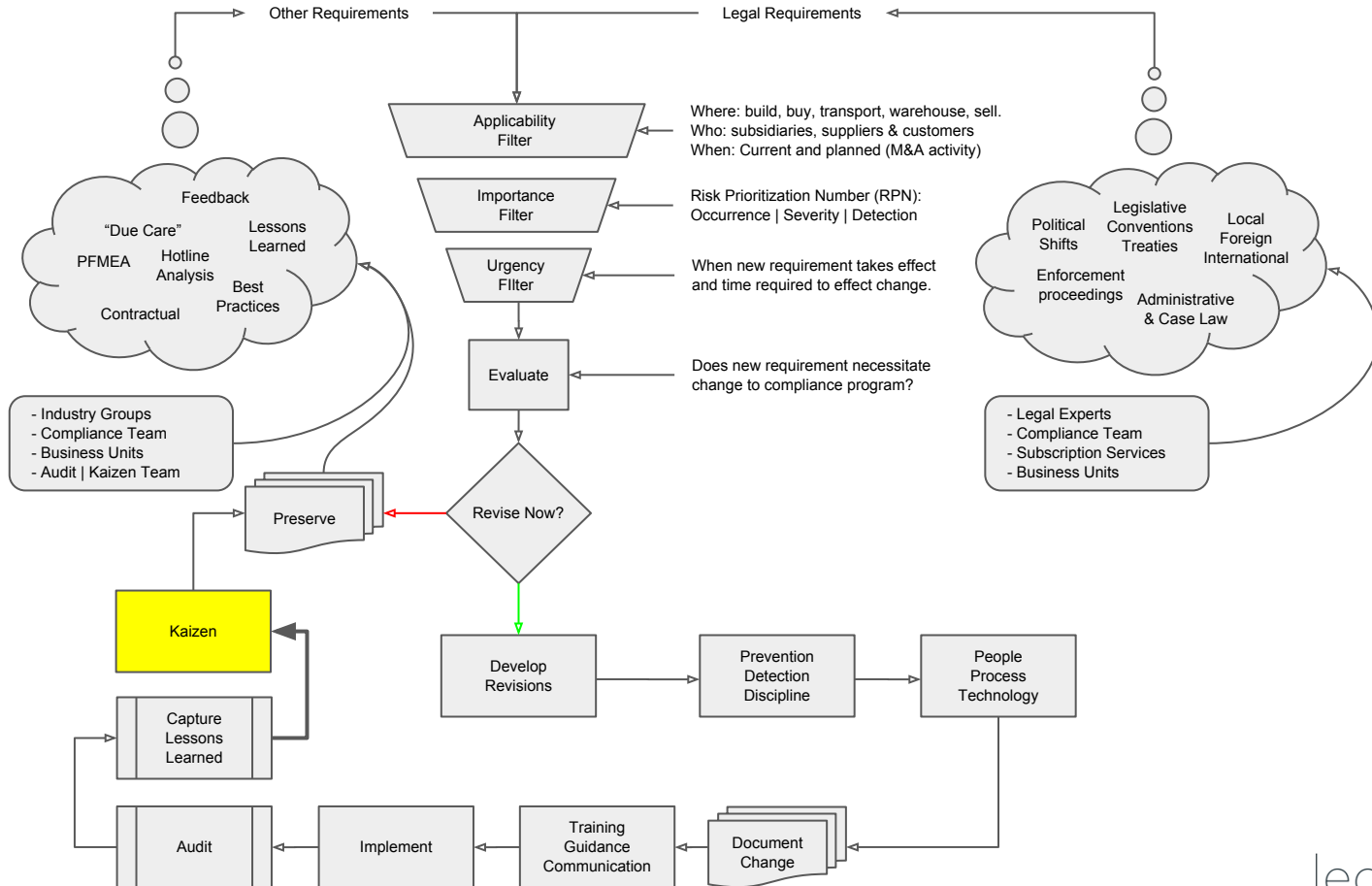
(16) Conduct Routine & Random Audits



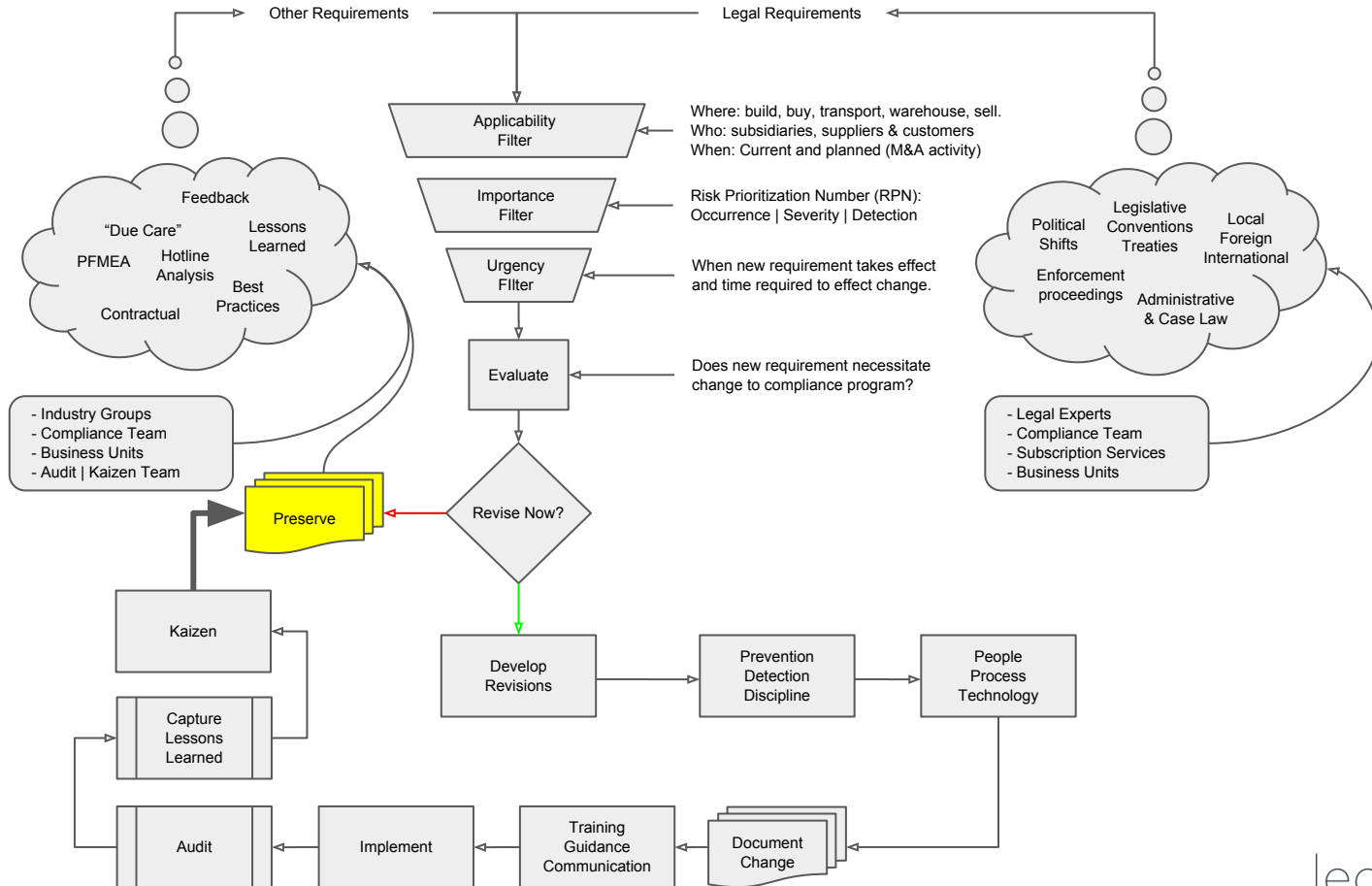
(17) Capture Lessons Learned During Audits



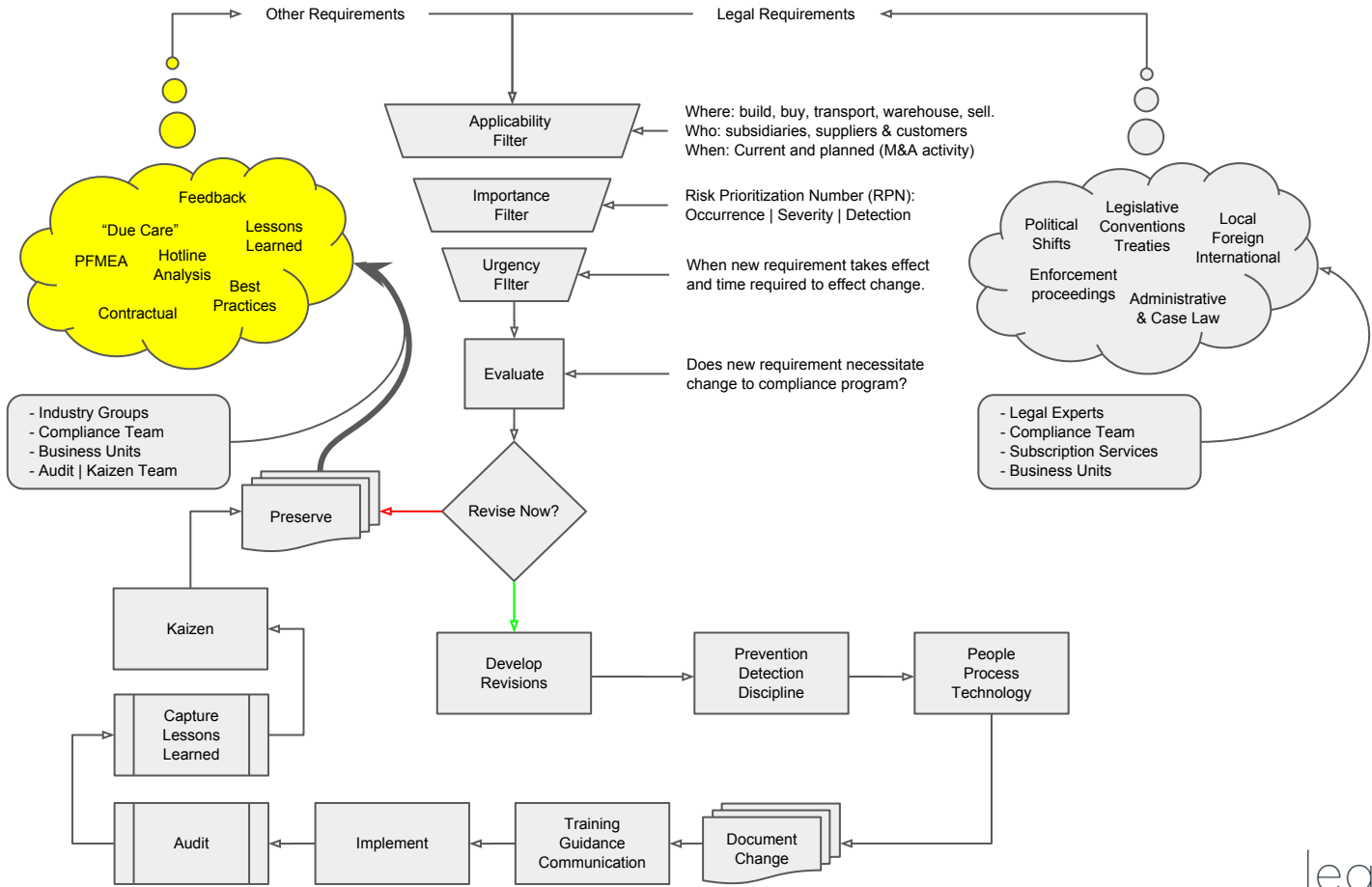
(18) Make Kaizen Improvements (not policy or program level)



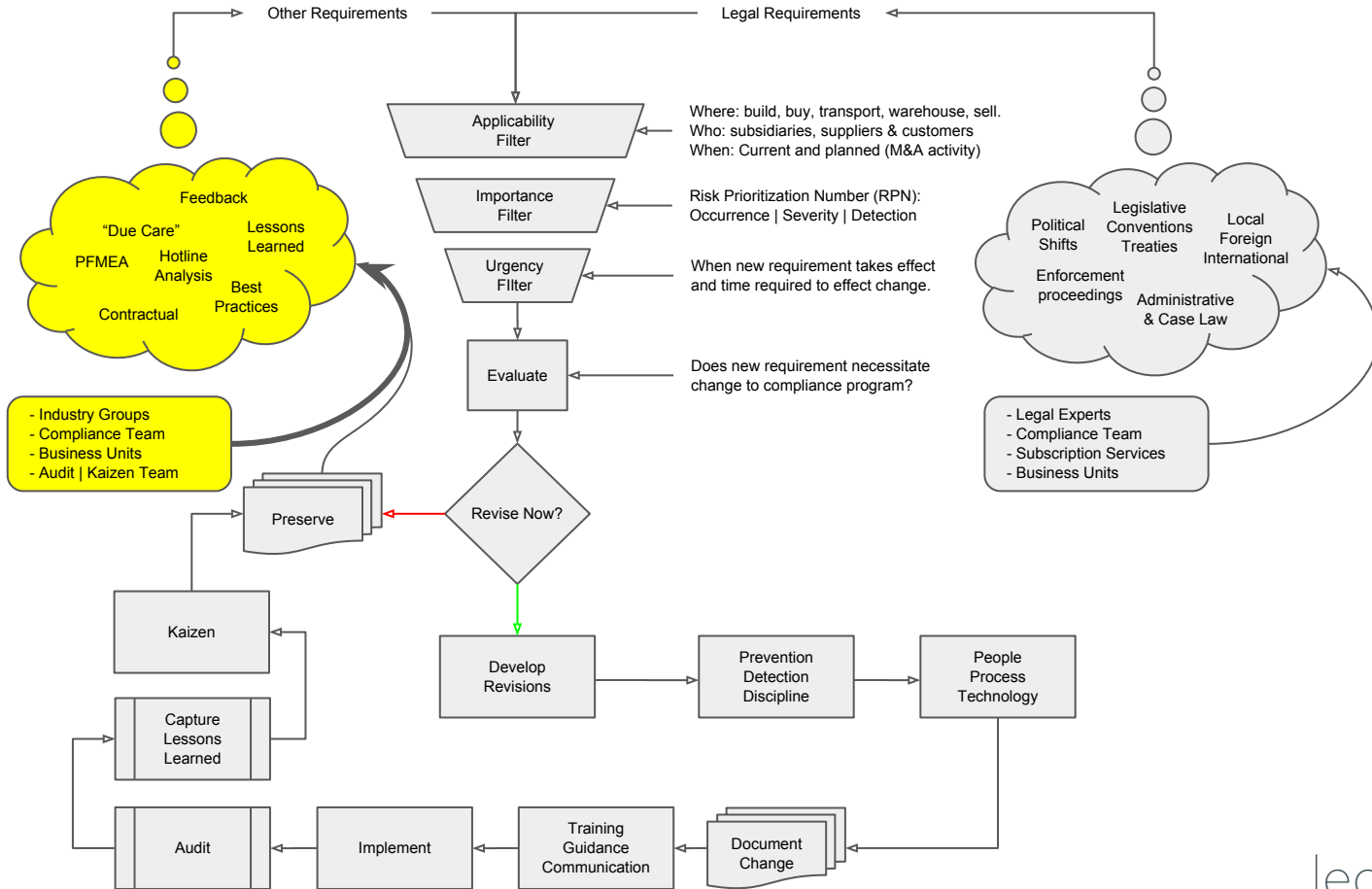
(19) Preserve Lessons Learned and Kaizen



(20) Add Preserved Know How, “Due Care” to Feedback Loop for Other Requirements



(21) Monitor Industry Groups for Other Potential Requirements



(22) Gather Other Potential Requirements

