

# SOME LESSONS FROM SOME TRENCHES

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# Lesson #1

- Know the risks the target country presents
  - Placement on corruption indices
    - Reasons
  - Circumstances particular to country
    - State-owned enterprises
    - Licensing, regulatory decisions
      - Degree of centralization
    - Complexity of legal scheme
    - State of economic development
    - Typical business practices
      - E.g., gift-giving, payments

# Lesson #2

- Triage the risks your business may present
  - Design, develop, implement in single step or as cascade?
  - Different business activity levels present different levels of risk
    - Foundation of ethics, compliance critical in any case

# Lesson #3

- Enroll business in process, program
  - Risk assessment
    - Intended participation
    - Unintended input
  - Policies
  - Guides
  - Implementation

# Lesson #4

- Consider interplay of all relevant decrees
  - Jurisdiction
    - US
    - International
    - National
    - Industry
  - Subject matter
    - Anti-corruption
    - Pharmaceutical

# Lesson #5

- Understand the culture
  - Values, drivers
  - Particular customs, practices
    - E.g., punctuality, eye contact, formality of dress, use of titles
  - Particular sensitivities
    - E.g., language, comparisons to other cultures