

## THEMATIC REVIEW ON COMPLIANCE WITH ANTI-CORRUPTION POLICIES AND PROCEDURES

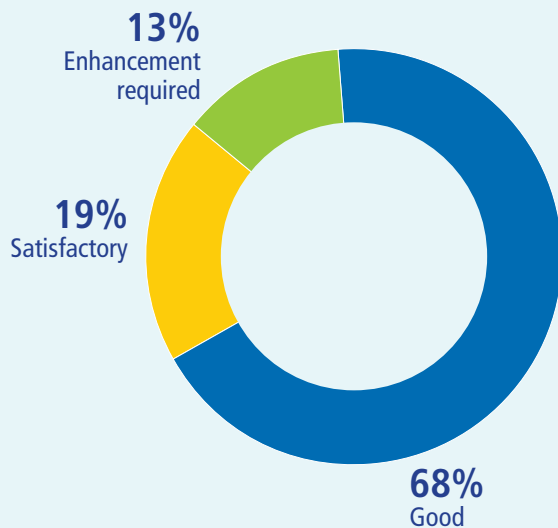
### SCOPE OF REVIEW

The SC undertook a thematic review to assess the level of intermediaries' compliance with requirements on anti-corruption policies and procedures, which was introduced in light of the corporate liability provision under section 17A of the MACC Act, which came into force on 1 June 2020.

The thematic review covered 255 intermediaries supervised by the SC and was conducted via a questionnaire.

CHART 1

Level of overall compliance by intermediaries to s17A MACC Act



### OBSERVATIONS

While the SC's review found that the majority of intermediaries had anti-corruption policies and frameworks in place, there was still room for improvement. These include the adequacy and comprehensiveness of policies and procedures, risk assessment, monitoring and training.

The SC noted that 68% of intermediaries had displayed a good overall level of compliance, having an adequate anti-corruption framework. Meanwhile, 19% of intermediaries had a satisfactory level of compliance and 13% requiring enhancements to their anti-corruption framework.

Following the thematic review, the SC will be taking the following steps in order to communicate the observations to the intermediaries and the industry:

- Issuance of Supervisory Letters to intermediaries, requiring significant enhancements to the framework to ensure relevant gaps are addressed;
- Issuance of communication to the senior management of intermediaries (by regulated activity) to share the specific observations noted from the thematic review; and
- Publication of specific observations and good practices noted from thematic review in the SC's newsletter, *The Reporter*.