

NAVIGANT

GLOBAL INVESTIGATIONS & COMPLIANCE

Sharpen Your Perspective

Third Party Compliance & Investigations



DISPUTES & INVESTIGATIONS • ECONOMICS • FINANCIAL ADVISORY • MANAGEMENT CONSULTING

About Navigant (NYSE: NCI) is a specialized, global expert services firm dedicated to assisting clients in creating and protecting value in the face of critical business risks and opportunities. Through senior level engagement with clients, Navigant professionals combine technical expertise in Disputes and Investigations, Economics, Financial Advisory and Management Consulting, with business pragmatism in the highly regulated Construction, Energy, Financial Services and Healthcare industries to support clients in addressing their most critical business needs. Navigant Consulting has offices in over 43 cities in North America, Europe and Asia.



As anti-corruption laws and regulations continue to be rigorously enforced around the globe, the challenges of utilizing sales agents, distributors, re-sellers and other intermediaries and suppliers in your global supply chain are increasingly at the center of corruption investigations. One misstep by one of your third party partners could result in millions of dollars of regulatory fines, legal penalties, and considerable reputational damage. Navigant's anti-corruption investigations and compliance professionals leverage their proprietary onboarding and investigative portal, comprehensive risk scoring methodology and extensive investigative and regulatory compliance skills to develop, implement and enhance clients' third party due diligence efforts.

lead with experience.

expect results.

THE CHALLENGE

ENHANCED DUE DILIGENCE INVESTIGATIONS

THE SOLUTION

In response to a U.S. regulatory agency's inquiry, a telecommunications software company was required to perform anti-corruption due diligence investigations regarding its global third parties and requested Navigant's assistance. Our analyses revealed a number of high risk relationships, including one alleged incident in which a client's customer had established a network of business relationships with government officials throughout Africa and was using this network to sell weapons to unstable African countries.

As a result of our work, the client was able to identify high risk entities and implement appropriate anti-corruption measures.

THE CHALLENGE

BEST-IN-CLASS THIRD PARTY DUE DILIGENCE PROGRAM

THE SOLUTION

A large global industrial products and electronics company chose to develop an enterprise-wide, third party anti-corruption program. The program included at its center Navigant's proprietary risk-scoring process, which was applied to the client's global master vendor file comprised of over 40,000 third parties. Navigant identified the client's high risk third parties while at the same time applying risk scoring to the onboarding of prospective third party partners. Upon identification of these high risk third parties, Navigant continues to perform several levels of due diligence investigation. **Through Navigant's assistance, the client's third party risk mitigation program has been widely held to be among the world's leading third party anti-corruption programs.**

THE CHALLENGE

INCREASED PROTECTION

THE SOLUTION

During a third party due diligence investigation, Navigant determined the client's existing distributor operating in the Russian Federation had declared bankruptcy and was legally dissolved two years earlier. This raised serious questions about both the company and the client business sponsor responsible for its oversight. It further raised questions as to which legal entity had taken the company's place and what legal protections the client had, if any, since the entity with which they had contracted no longer existed. **Navigant's findings enabled the client to identify the successor entity and put in place the appropriate legal protections commensurate with the company acting as a distributor of the client's products.**

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DECISIONPOINTSM

DecisionPointSM is Navigant's anti-bribery onboarding portal. It was designed for the investigation of distribution and supply chain third parties. DecisionPointSM addresses the challenges inherent in utilizing intermediaries and suppliers, such as onboarding, regulatory compliance and education, information gathering, approvals and investigative processes as they relate to anti-bribery and other compliance regulations. DecisionPointSM facilitates the third party onboarding process, assesses and risk scores third party corruption risk and enables due diligence investigations when appropriate.

SOPHISTICATED RISK SCORING

Navigant utilizes a complex risk scoring protocol with a proven track record for effectiveness. Navigant's investigative risk scoring process considers the descriptive characteristics of the entity and its principals; answers to certain questions as to interaction with foreign officials, relationship with the client, aggregate spend and payment instructions; denied parties lists; presence of politically exposed persons; prior corruption; indicators of state ownership; government sales; and other risks comprising over 100 proprietary rules.

STATE OF THE ART ONBOARDING PORTAL

DecisionPointSM was designed to meet clients' needs for a better, more sophisticated means of collecting and managing rich, corruption-specific information about third parties and to drive greater efficiencies in onboarding, risk scoring, due diligence and approval processes.

NUANCED INVESTIGATIONS

Navigant's deliverables are highly nuanced to the facts of the individual case, relationship with the client and how the specific findings may impact the client. They are subject to intensive quality control and color coded to assist in prioritizing review.

CRADLE TO GRAVE PROGRAM ADMINISTRATION

Navigant was the first to innovate the application of a risk based approach to third party anti-corruption by utilizing risk scoring as a targeting mechanism and a first line of due diligence screening. Navigant has designed, implemented, streamlined and continues to administer some of the world's most sophisticated and robust third party anti-corruption control systems.

THIRD PARTY DUE DILIGENCE SERVICES

Our anti-bribery & corruption investigations and compliance professionals conduct investigations and assess and enhance compliance programs, including internal controls systems; develop and implement training programs; and deploy proprietary technological and investigative due diligence protocols for some of the world's largest companies.

Services include:

- » Program assessment and development
- » Risk scoring and risk ranking
- » Due diligence investigations
- » Training

Visit www.navigant.com/anticorruption for our latest perspectives on anti-bribery and anti-corruption topics ranging from third party due diligence to the Dodd-Frank whistleblower rules.