



RAG Strategists Advisory Note 8

“Shaping and sharing best practice in infrastructure anti-corruption”

PRECCA (2004) Section 34A / “Adequate Procedures” Defence / Top-Level Commitment

Senior leadership is best placed to promote a culture of integrity where corruption is not tolerated. This principle aims to ensure that top-level management is actively involved in establishing anti-corruption measures and in making key decisions related to corruption risks that an organisation faces. Top-level management should demonstrate commitment to preventing corruption by clearly communicating the organisation’s anti-corruption stance and by being suitably involved in anti-corruption measures.

Top-level commitment can be shown in various ways, with a formal, well-communicated statement being a powerful tool in promoting and supporting an anti-corruption culture. This communication should be tailored to different audiences, shared regularly and made easily accessible to all. An effective anti-corruption statement typically includes:

- A clear commitment to conducting business fairly, honestly, and transparently
- A zero-tolerance approach to corruption
- The consequences for employees and managers who violate the policy
- The consequences for third parties breaching anti-corruption clauses and a preference for working only with those who share the same ethical standards
- The business advantages of rejecting corruption, such as enhanced reputation and trust from customers, partners and investors
- An overview of existing or planned anti-corruption procedures, including whistleblowing protections
- The identification of key people and departments responsible for the anti-corruption program
- A mention of any collaborative efforts within the industry to combat corruption

An organisation’s top-level management must demonstrate a strong commitment to preventing corruption by anyone linked to the business. They should always promote a culture where corruption is completely unacceptable.

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