



RAG Strategists Advisory Note 9

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

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

Effective leadership in corruption prevention should be tailored to an organisation’s size, structure, and context. In smaller organisations, top managers may need to be directly involved in developing and implementing anti-corruption measures. In larger organisations, such as multinationals, the board should set policies and delegate implementation to management, with ongoing oversight. Regardless of the model, strong top-level engagement is essential for successful implementation.

Top-level demonstrable (‘provable’) evidence should reflect the following elements:

- Appointing and training of senior managers to lead anti-corruption initiatives.
- Taking the lead on key initiatives, such as developing and promoting a code of conduct.
- Approving all publications related to corruption prevention.
- Promoting awareness and fostering open communication across the organisation to ensure anti-corruption policies and procedures are effectively shared with employees, subsidiaries, and associated individuals.
- Engaging with relevant partners and external stakeholders, including industry bodies and media, to communicate the organisation’s anti-corruption stance.
- Participating directly in high-profile or critical decisions when necessary.
- Ensuring comprehensive corruption risk assessments are conducted.
- Overseeing instances of non-compliance and, where appropriate, reporting back to the board on overall adherence to procedures.

Strong leadership ensures anti-corruption efforts are embedded, monitored and upheld across all levels, reinforcing integrity and accountability throughout the organisation.

Advisory Note 9 prepared by RAG Strategists (Pty) Ltd

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Contact: Anton Krause

Mobile: 082 4470808

E-mail: anton@ragstrategists.co.za
www.ragstrategists.co.za

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