

Checklist:

- Risk Management Process
- Risk-Tailored Resource Allocation
- Updates and Revisions
- Design
- Comprehensiveness
- Accessibility
- Responsibility for Operational Integration
- Gatekeepers
- Risk-Based Training
- Form/Content/Effectiveness of Training
- Communication about Misconduct
- Availability of Guidance
- Effectiveness of Reporting Mechanism
- Properly Scope Investigations by Qualified Personnel
- Investigation Response
- Resources and Tracking of Results
- Risk-Based and Integrated Processes
- Appropriate Controls
- Management of Relationships
- Real Actions and Consequences
- Due Diligence Process
- Integration into the M&A Process
- Process Connecting Due Diligence to Implementation
- Conduct at the Top
- Shared Commitment
- Oversight
- Structure
- Seniority and Stature
- Experience and Qualifications
- Funding and Resources
- Autonomy
- Outsourced Compliance Functions
- Human Resources Process
- Consistent Application
- Incentive System
- Internal Audit
- Control Testing
- Evolving Updates

- Culture of Compliance
- Properly Scoped Investigation by Qualified Personnel
- Response to Investigations
- Root Cause Analysis
- Prior Weaknesses
- Payment Systems
- Vendor Management
- Prior Indications
- Remediation
- Accountability