

ABC • FINANCIAL SECTOR

Anti-Corruption and Bribery (ABC) Financial Sector – Luxembourg

▲ 7 chapters

▲ Legal framework, corruption risks, governance, case studies and integrity culture

7 CHAPTERS

▲ Training programme

1 Introduction and key challenges of anti-corruption

1.1 Objectives and scope of the training

- ▶ Awareness of corruption risks
- ▶ Individual and collective responsibility

1.2 Importance for the financial sector

- ▶ Trust and reputation
- ▶ Regulatory expectations

2 Legal and regulatory framework

2.1 Definitions and typologies of corruption

- ▶ Active and passive corruption
- ▶ Public and private corruption

2.3 European and international framework

- ▶ OECD
- ▶ United Nations
- ▶ European Union

2.2 Luxembourg legal framework

- ▶ Criminal Code
- ▶ Liability of natural and legal persons

2.4 Authorities and supervision

- ▶ CSSF
- ▶ FIU
- ▶ Other competent authorities

3 Corruption risks in the financial sector

3.1 Risk typologies

- ▶ Third parties and intermediaries
- ▶ Business practices
- ▶ Geographical areas and sensitive sectors

3.3 Warning signs

- ▶ Operational red flags

3.2 Link with AML/CFT and sanctions

- ▶ Corruption as a predicate offence
- ▶ Sanctions and reputational risk

- ▶ High-risk situations

4 Governance and ABC compliance programme

4.1 Key principles of the ABC programme

- ▶ Tone from the Top
- ▶ Code of conduct

4.3 Internal controls and arrangements

- ▶ Procedures and traceability
- ▶ Reporting and escalation

4.2 Risk management

- ▶ Risk assessment
- ▶ Third-party due diligence

4.4 Training and awareness

- ▶ Ongoing training
- ▶ Compliance culture

5 Practical case studies

5.1 Gifts and hospitality

- ▶ Invitations and benefits
- ▶ Acceptability criteria

5.3 Conflicts of interest

- ▶ Personal situations

5.2 Third parties and intermediaries

- ▶ Local consultants
- ▶ Suspicious payments

- ▶ Management and disclosure

6 Sanctions, enforcement and integrity culture

6.1 Legal and disciplinary sanctions

- ▶ Criminal and administrative sanctions
- ▶ Individual liability

6.3 Integrity culture

- ▶ Values and behaviours

6.2 Enforcement and cooperation

- ▶ Actions by authorities
- ▶ Reporting and whistleblowing

- ▶ Integrity as a strategic asset

7 Conclusion

7.1 Key messages

- ▶ Zero tolerance

- ▶ Vigilance and transparency

- ▶ Responsibility of everyone

KEY MESSAGES

Zero tolerance, vigilance and transparency, responsibility of everyone.