

Table of Contents

Foreword	5
Introduction	7

Part I: Historical and Legal Perspectives

Chapter 1	ICC Rules of Conduct and the OECD Convention	11
Chapter 2	UNCAC: Anti-Corruption's Expanding	23
Chapter 3	Prohibiting Bribery and Extortion: Narrowing the problem areas	37
Chapter 4	The Role of agents and other Intermediaries	53

Part II: Management Initiatives

Chapter 5	Responsibilities of Enterprises	67
Chapter 6	Accounting, Auditing and Financial Controls	85
Chapter 7	Whistleblowing	101
Chapter 8	Compliance by Small and Medium-Sized Enterprises	117

Part III: Problem Areas

Chapter 9	Money Laundering	127
Chapter 10	Political and charitable Contributions and Sponsorships	153
Chapter 11	Private to Private Bribery	167
Chapter 12	Preventing Extortion	183
Chapter 13	Overcoming Corruption on Customs	195
Chapter 14	Moving Anti-Corruption to the Next Level	209

Appendices

Appendix 1:	ICC Rules of Conduct and Recommendations: Combating Extortion and Bribery (2005 edition)	219
Appendix 2:	ICC Guidelines on Whistleblowing	231
Appendix 3:	OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions	237
Appendix 4	United Nations Convention against Corruption	251
Appendix 5	Council of Europe Civil Law Convention on Corruption	299
Appendix 6	About the authors	301
ICC at a Glance		305