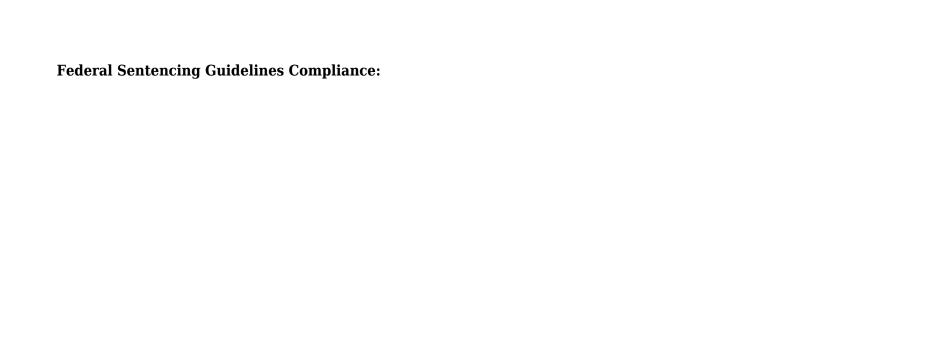
# Federal Sentencing Guidelines - Minimum Requirements for Effective Ethics Compliance Program

- 1. Establish compliance standards and procedures
- 2. Assign top level management overall responsibility for compliance
- 3. Don't delegate responsibility to employees who are not trustworthy
- 4. Communicate standards and procedures to all employees

- 5. Monitoring and audit systems used to detect unethical activities
- 6. Enforce ethical standards through appropriate disciplinary mechanisms
- 7. Make adjustment to ethical process if unethical behavior has occurred

## **Federal Sentencing Guidelines Compliance**

**Ian Pickup** 



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