

Summary of Contents

PART I. COMPLIANCE PROGRAMS UNDER THE SENTENCING GUIDELINES

- Chapter 1. Sentencing Guidelines: In General
- Chapter 2. Corporate Sentencing Guidelines: Drafting History
- Chapter 3. Corporate Sentencing Guidelines: Overview
- Chapter 4. An Effective Compliance and Ethics Program

PART II. ESTABLISHING AN EFFECTIVE COMPLIANCE PROGRAM

- Chapter 5. Threshold Considerations
 - Appendix 5-A. Model Statute
- Chapter 6. Compliance Risk Assessment
 - Appendix 6-A. Compliance Program Risk Inventory
- Chapter 7. Corporate Culture and Compliance Programs
- Chapter 8. Codes of Conduct
- Chapter 9. Assigning Compliance Responsibility
 - Appendix 9-A. Business Unit Compliance Position Description
 - Appendix 9-B. Compliance Officer Position Description
 - Appendix 9-C. Standards of Conduct for Business Ethics and Compliance Professionals
 - Appendix 9-D. Code of Ethics for Compliance and Ethics Professionals
- Chapter 10. Board Oversight of the Corporate Compliance Function
- Chapter 11. Care in Delegating Authority
- Chapter 12. Training and Other Communications
 - Appendix 12-A. Compendium of Compliance Program Resource Materials
- Chapter 13. Auditing, Monitoring and Other Internal Controls

- Appendix 13-A. Antitrust Compliance Training Feedback
- Appendix 13-B. Compliance Auditing: Red Flags
- Appendix 13-C. Inventory of Audit and Monitoring Tools
- Chapter 14. Retaliation, Whistleblowers, and Reporting Systems
- Chapter 15. Response to Problems: Investigations, Disclosure of Violations, and Crisis Response
- Chapter 16. Employee Discipline and Incentives
 - Appendix 16-A. Form—Communication to Employees
 - Appendix 16-B. Model Policy—Guidelines for Disciplinary Action for Violations of the Employee Code of Conduct
 - Appendix 16-C. Taking a Disciplined Approach to Discipline—Enforcing Compliance Standards
- Chapter 17. Measuring the Effectiveness of Compliance and Ethics Programs
 - Appendix 17-A. Inventory of Measurement Tools
- Chapter 18. Ethics and Compliance Surveys
- Chapter 19. Industry Practice: The Defense Industry Experience
 - Appendix 19-A. Defense Industry Initiative on Business Ethics and Conduct
 - Appendix 19-B. Department of Defense Inspector General Voluntary Disclosure Program
- Chapter 20. Labor and Employment Issues
- Chapter 21. Globalizing the Compliance Program: Why and How
 - Appendix 21-A. Globalizing the Code of Conduct
- Chapter 22. Implementing a Compliance and Ethics Program in China

PART III. COMPLIANCE PROGRAMS IN COURT AND BEYOND

- Chapter 23. Compliance Programs and Criminal Law
- Chapter 24. Impact of Corporate Compliance Outside the

SUMMARY OF CONTENTS

Criminal Process

Appendices

- Appendix A1. Chapter 8 to United States Sentencing Commission Guidelines Manual: Sentencing of Organizations (November 2021)
- Appendix A10. Department of Justice - May 12, 2025 Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime, Memorandum to all Criminal Division Personnel by Matthew R. Galeotti, Head of the Criminal Division, Department of Justice.
- Appendix A15. Criminal Division Corporate Enforcement and Voluntary Self-Disclosure—May 2025
- Appendix A20. Memorandum on Selection of Monitors in Criminal Division Matters
- Appendix A30. Criminal Division Corporate Enforcement and Voluntary Self-Disclosure Policy
- Appendix B. U.S. Department of Justice—Factors in Decisions on Criminal Prosecutions for Environmental Violations in the Context of Significant Voluntary Compliance or Disclosure Efforts by the Violator
- Appendix C. Model Compliance Plan for Clinical Laboratories
- Appendix D. OECD.org - Recommendation of the Council for Further Combating Bribery of Foreign Public Officials in International Business Transactions
- Appendix E. Glossary
- Appendix F. Justice Manual (formerly “U.S. Attorney’s Manual”) sections 9-28.000–9-28.1600
- Appendix G. Justice Manual, section 9-47-120 FCPA Corporate Enforcement Policy
- Appendix H. Justice Manual, section 1-12.100 Coordination of Parallel, Criminal, Civil, Regulatory, and Administrative Proceedings
- Appendix I. Organizational Worksheets
- Appendix J. Federal Antitrust Crime: A Primer for Law Enforcement Personnel

COMPLIANCE PROGRAMS

- Appendix K. U.S. Department of Justice Criminal Division
Evaluation of Corporate Compliance Programs
(Updated September 2024)
- Appendix L. U.S. DOJ Antitrust Division-Evaluation of
Corporate Compliance Programs in Criminal
Antitrust Investigations-November 2024

Table of Laws and Rules

Table of Cases

Index