



ANTI-CORRUPTION HOTLINE  
(+43 1) 4000-82400



[www.antikorruption.wien.at](http://www.antikorruption.wien.at)



Eine Brücke der  
ETHIK

**Vienna · Wien**  
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Anti-corruption policies  
and best practices –  
best practices from public  
and private sector



**OMV**



**Raiffeisen**



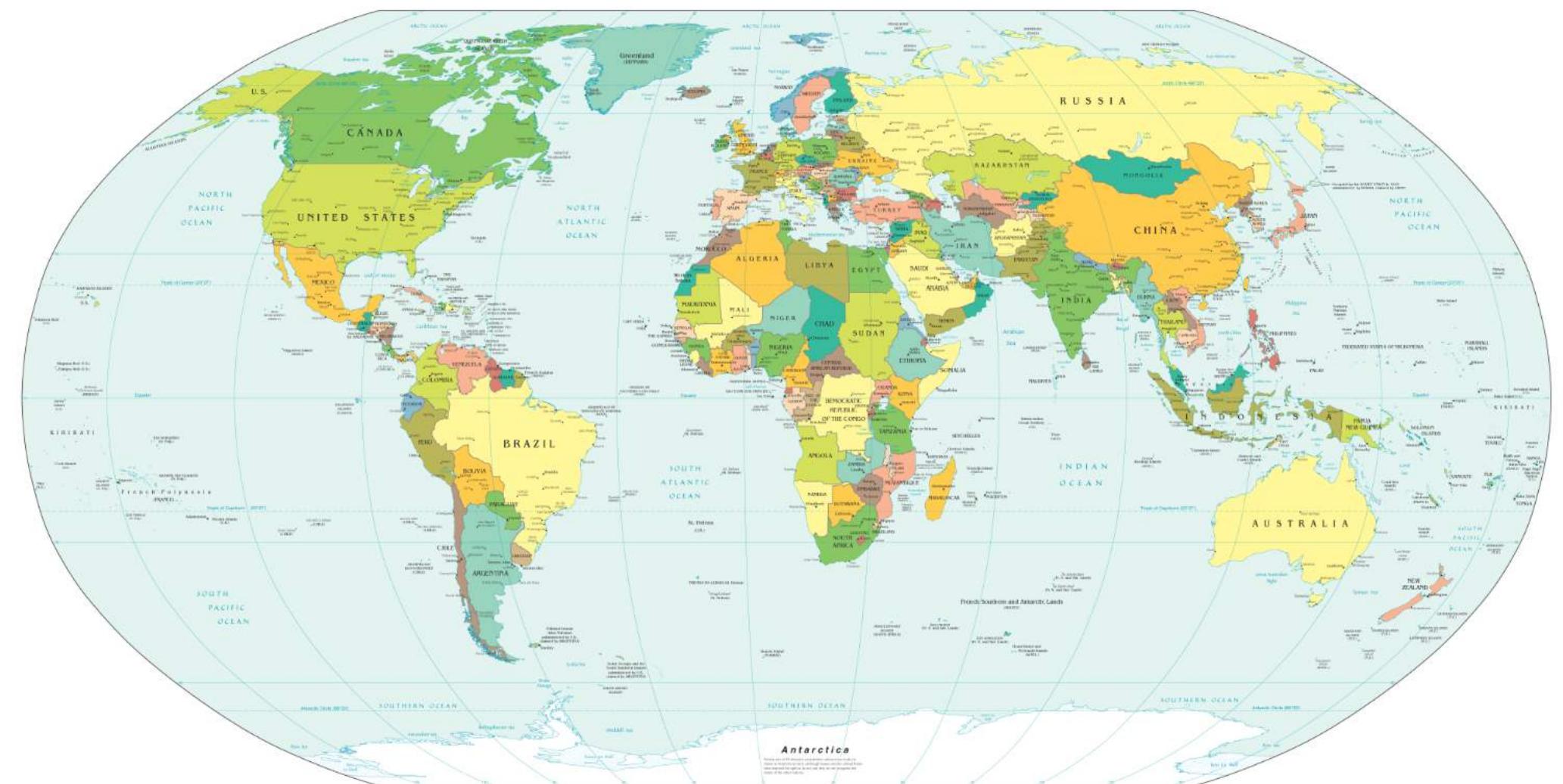
**SGIACC**

ANTI-CORRUPTION  
TRAINING MANUAL  
Version 1.0  
May 2009

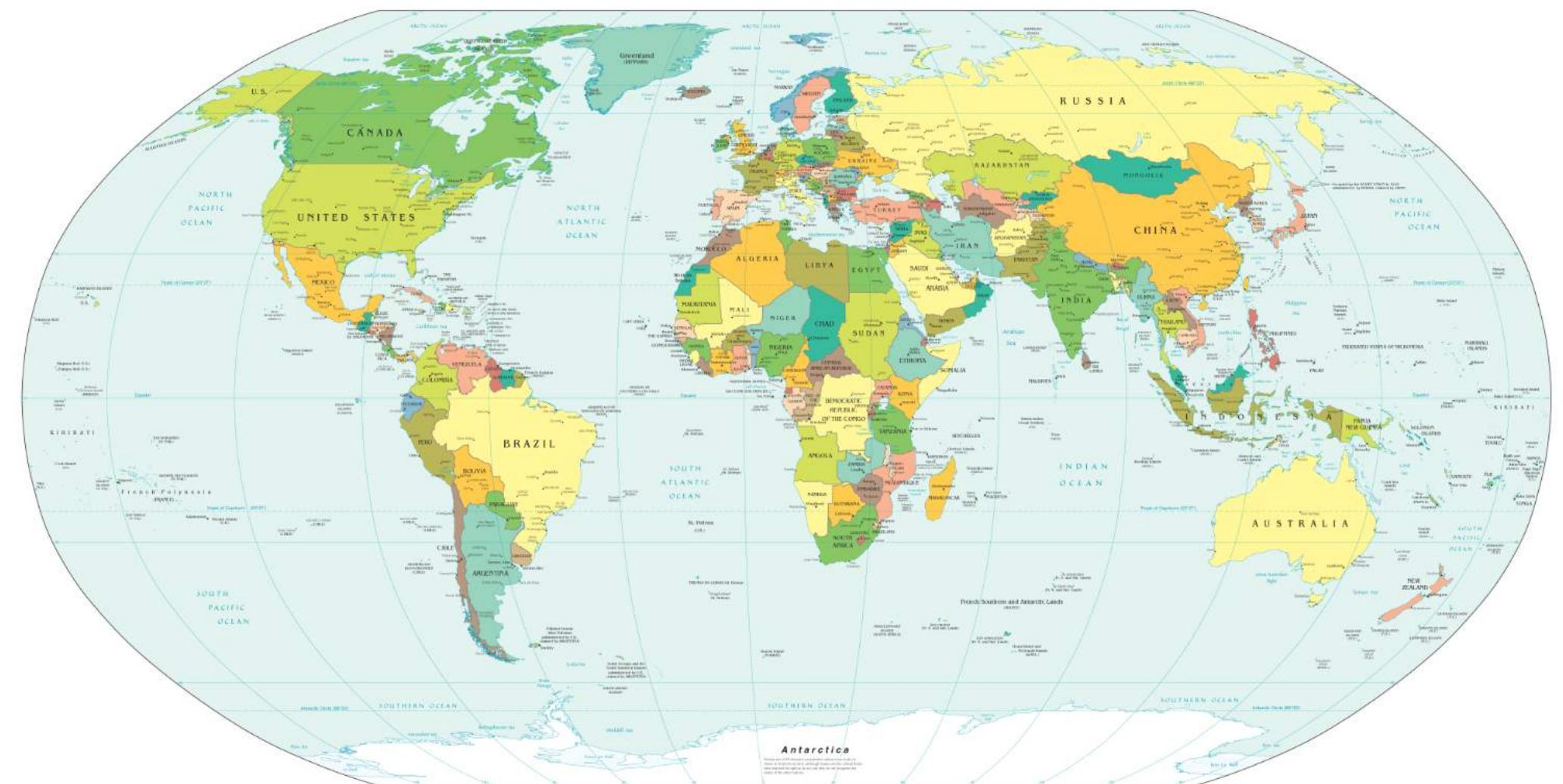


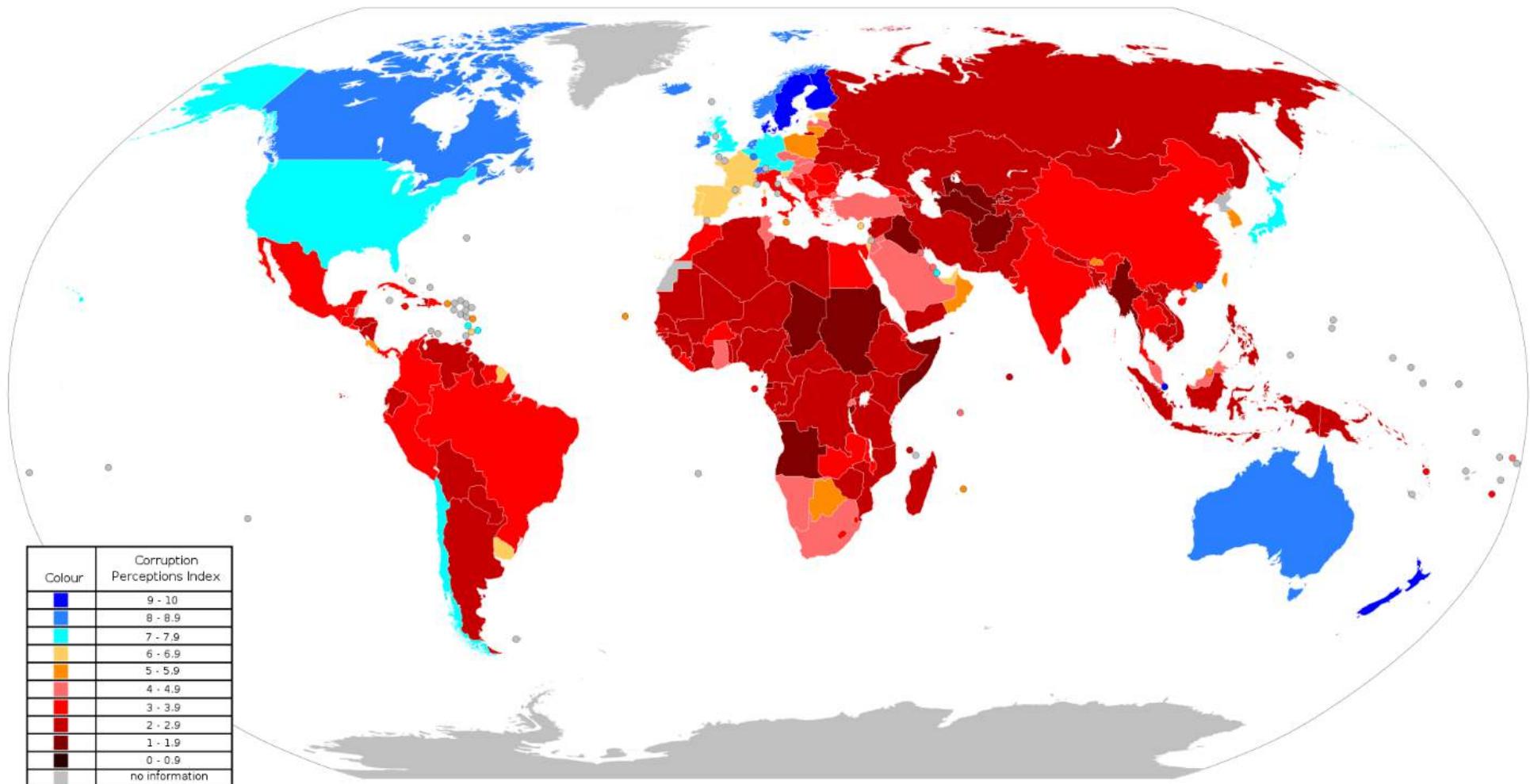
# **Anti-corruption policies and preventive measures – best practices from public and private sector**

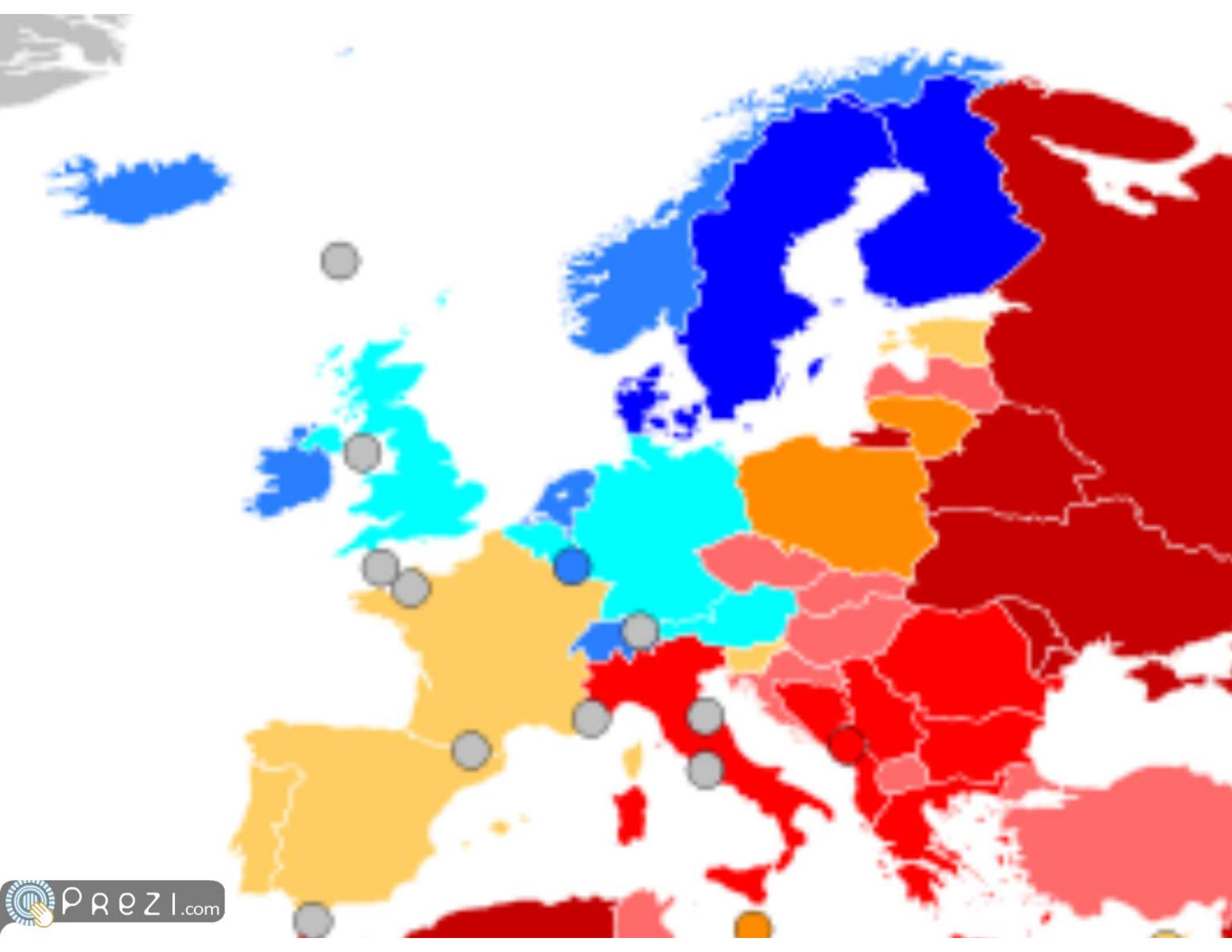




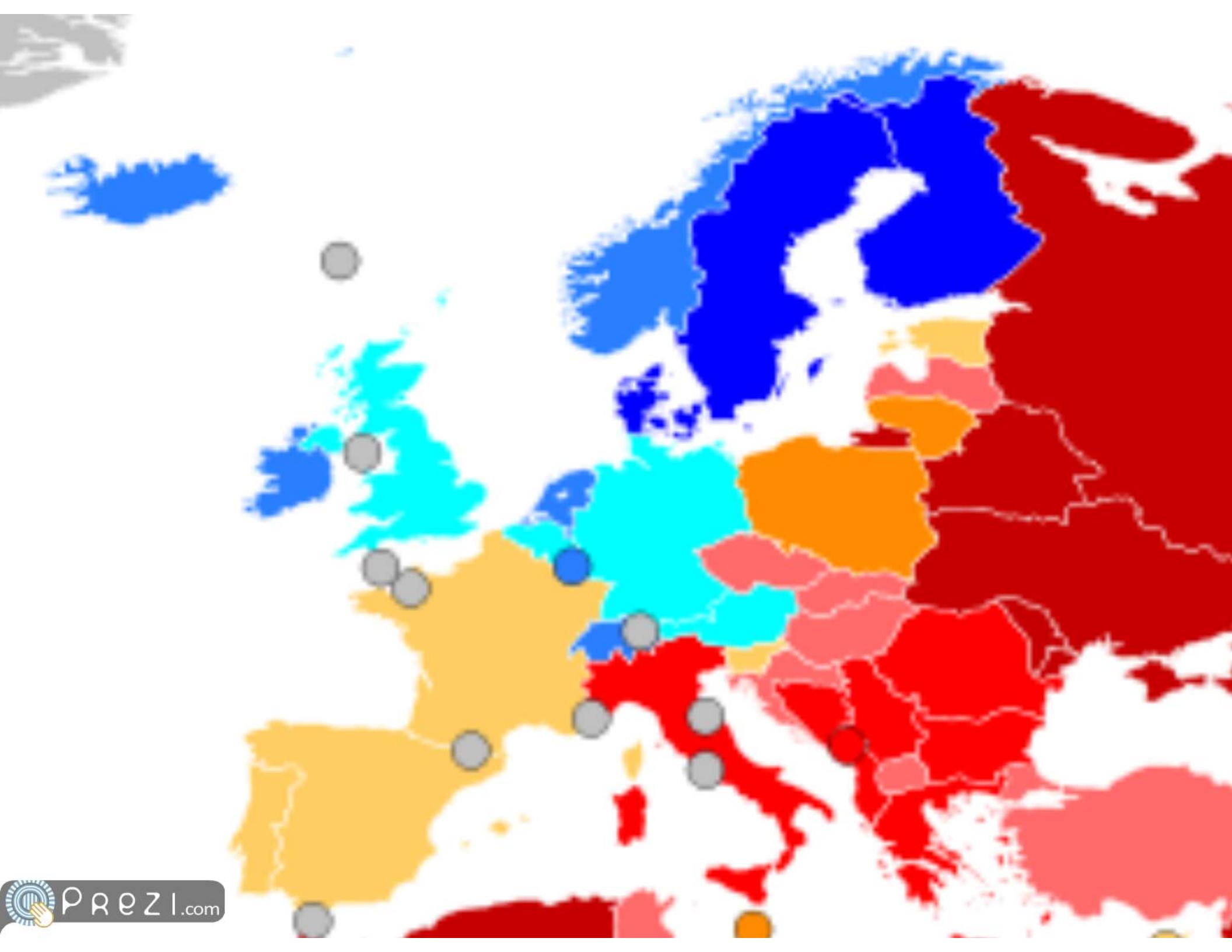














**BILLA**

# BILLA



## 1

# Wir trennen persönlich sen von de Unternehm



Wenn wir mit Geschäftspartnern zu tun haben, reagieren wir auf die METRO GROUP und ihre Interessen. Einen persönlichen Vorteil dürfen wir in diesen Situationen nicht anstreben, da wir sonst würden wir unseren eigenen Vorteil über die Interessen des Unternehmens stellen. Damit schaden wir uns selbst.

wir uns an den Vorgesetzten oder unseren Co



2

Wir bieten  
einen un  
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Egal ob öff  
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sonstige Dritte – wir bieten niemandem einen  
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erhält. Das gilt auch dann, wenn die Gewähru

### 3

## Wir nutzen Stellung sönlicher



sönlichen Vorteil zu fordern oder anzunehmen. Dabei ist es egal, ob eine dienstliche Entscheidung wäre oder nicht. Bereits der Anschein einer Einflussnahme darf nicht entstehen. Ausnahmen

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Diskriminierung von Rasse, ethnischer H  
Weltanschauung, Behinderung, Alter, se



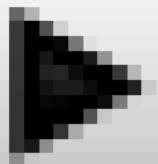
bedeutet zum Beispiel, dass wir das Respektieren, sich im Rahmen national



# STRABAG

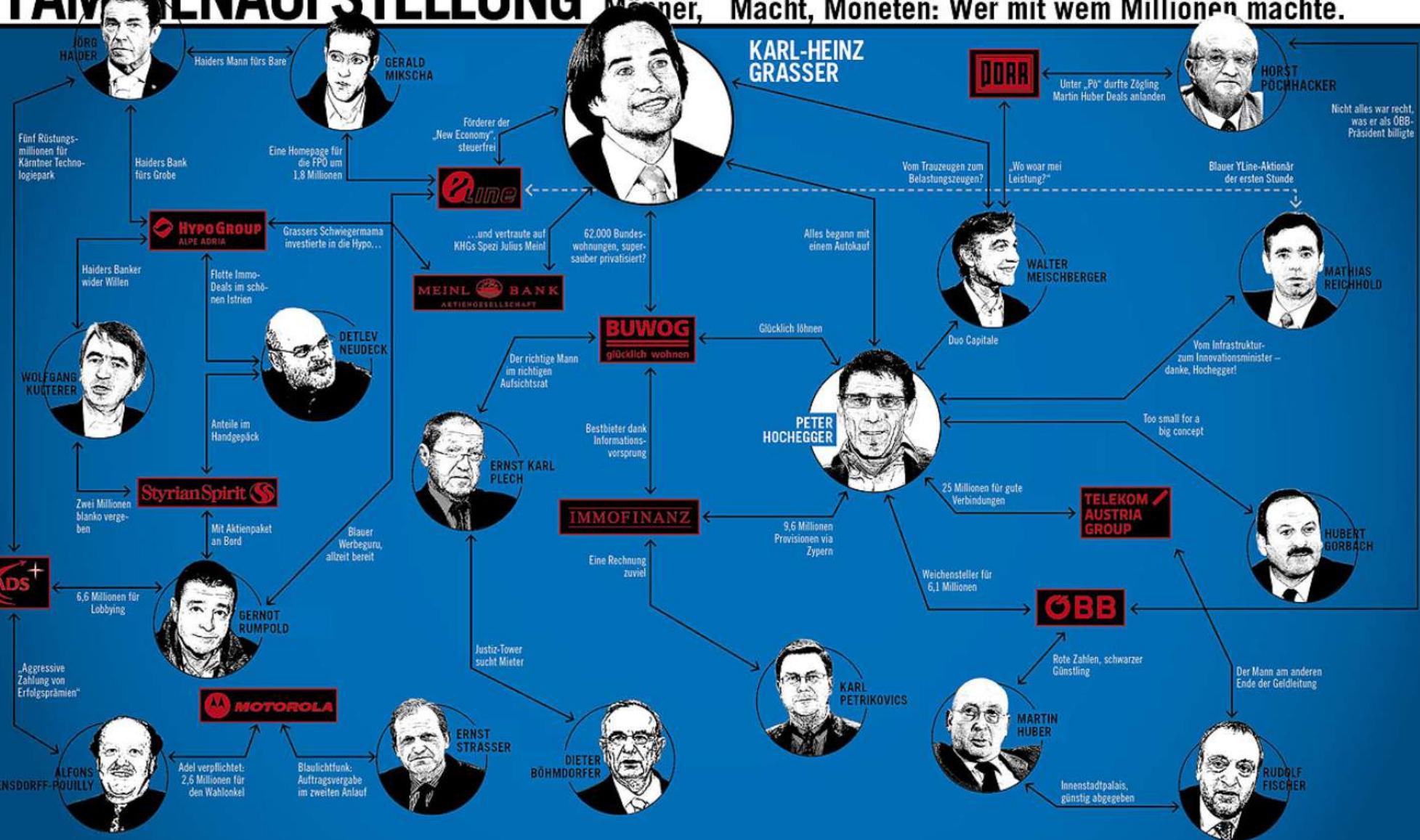
# STRABAG





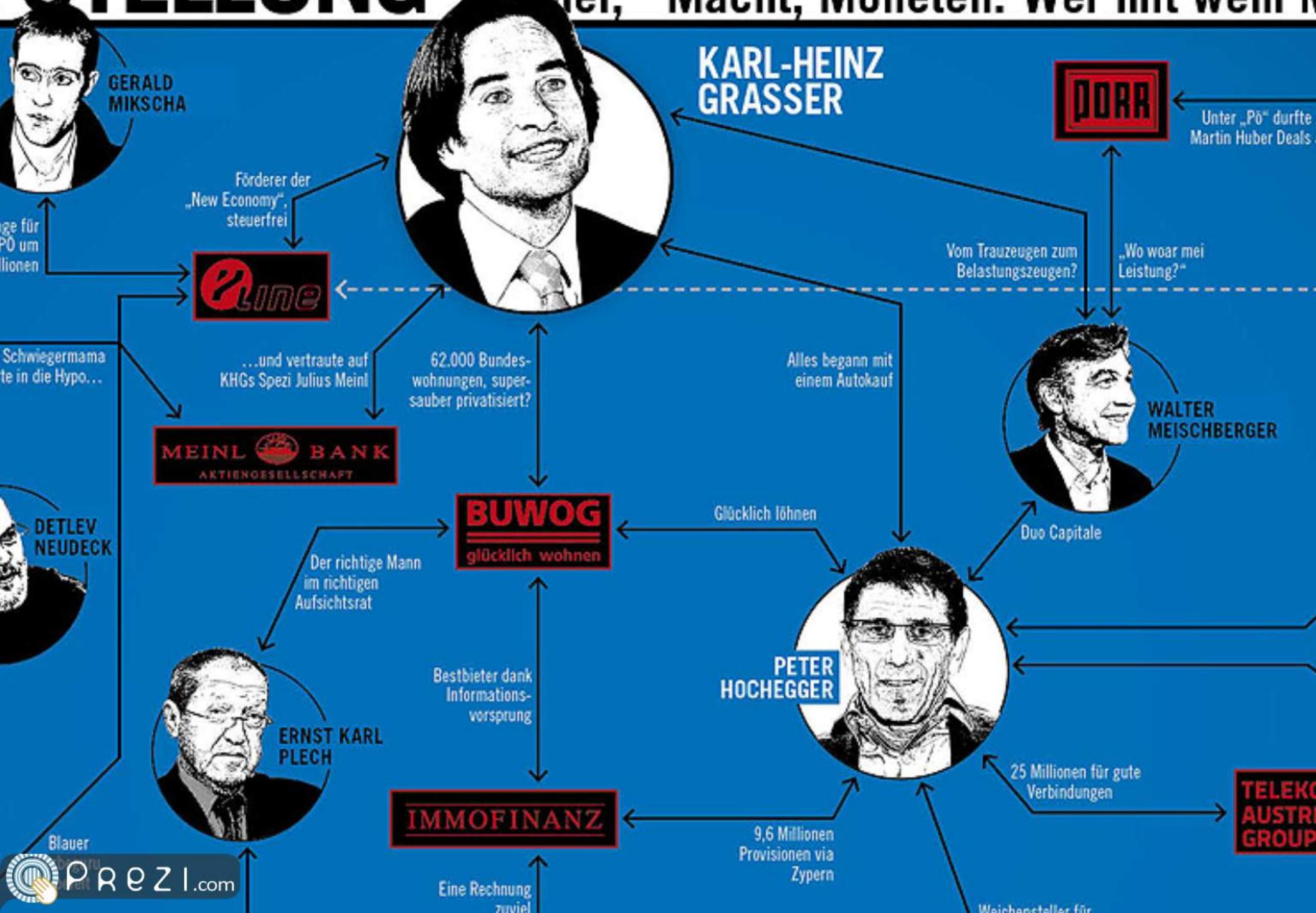
# FAMILIENAUFSTELLUNG

Männer, Macht, Moneten: Wer mit wem Millionen machte.



# FESTELLUNG

## Männer, Macht, Moneten: Wer mit wem M







# GIACC

*Global Infrastructure Anti-Corruption Centre*

# **ANTI-CORRUPTION TRAINING MANUAL**

**(INFRASTRUCTURE, CONSTRUCTION  
AND ENGINEERING SECTORS)**

**INTERNATIONAL VERSION**

**MAY 2008**

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**Disclaimer:** This Manual is not a definitive legal text and should not be relied on as such. Independent legal advice should always be obtained. GIACC, TI(UK) and the authors accept no responsibility for the consequences of any action taken in reliance on this document.

**Situation (3) :** A payment is demanded from you which you suspect may include a hidden bribe.

**Example:** An "expediting" fee is required by a government official to issue a permit in circumstances where the legitimacy of the fee is not clear, or a fee is demanded which the official claims is legitimate but which is higher than the published fee or appears to be disproportionately high given the action required.

**Legal position:** If you make the payment knowing or suspecting that it includes a bribe, and it does include a bribe, then it is likely that you and your employer will be liable for bribery.

**Caution:** Do not do or say anything which could put you or another person in danger.

**Suggested direct action:**

- Politely ask for documentary proof that the sum is payable, stating that you must account for all expenses to your employer, and that you will need an official receipt.
- If documentary proof and receipt are not provided, refuse to pay.
- If the demand is made by a government official, and there are government procedures in place to report the official, then inform the official that these procedures would require you to report.
- If the official refuses to issue the necessary permit or whatever is required, ask to see a senior official.
- If this request is refused, or if the senior official is unhelpful, say that your company will make a formal complaint to one or more of the relevant government department, the project owner, the funders, your embassy, and the criminal authorities.

**Make a record of the event:** As for Situation (1)

**Suggested reporting of the corruption:** As for Situation (1).

**Situation (8) :** As an officer or senior manager, you discover that your company is involved in a cartel.

**Example:** Several companies agree that they will share the market. When they tender for a particular project they secretly agree in advance which of them will win the project and at what price. The other companies then bid at a higher price in order to ensure that the selected company is the successful bidder.

**Legal position:** As for Situation (7). In addition, in a number of jurisdictions, immunity from prosecution may be given to the first company in a cartel to report the cartel to the authorities. Even if it is not the first to report the cartel, some mitigation of liability or penalty may be available if a company reports the cartel and/or co-operates with the authorities.

**Caution:** Do not do or say anything which could put you or another person in danger.

**Suggested direct action:** As for Situation (7).

**Make a record of the event:** As for Situation (1)

**Suggested reporting of the corruption:** As for Situation (7).

### **Example 5: Bribery during sub-contract procurement**

A procurement manager of a contractor is managing a competitive tender between sub-contractors. One of the sub-contractors offers a free holiday to the procurement manager if the procurement manager awards the contract to the sub-contractor. The procurement manager does so.

*Possible offenders:* Procurement manager, sub-contractor, individuals involved.

### **Example 6: Corruptly negotiated contract**

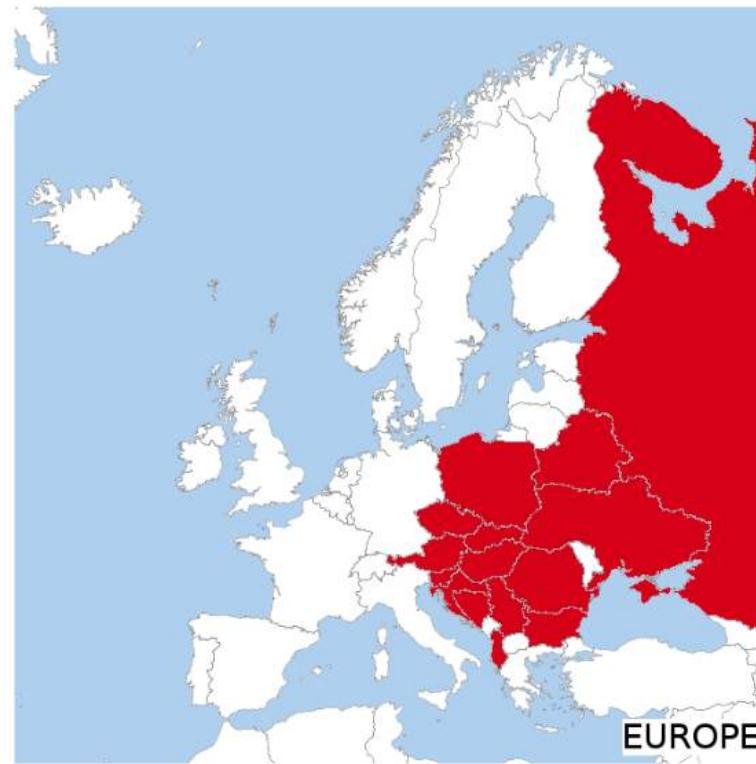
A senior government official who is in charge of the construction of new infrastructure projects wishes to enrich himself. He therefore decides to initiate a project which could conceal a major bribe for himself. In order to maximise the bribe potential, he ensures that the design will result in a project which is unnecessarily large and complex. He then informs a major contractor that he will ensure that the contractor is awarded the project on a non-competitive basis if the contractor includes in the contract price a payment for him personally of an amount equal to 30% of the contract price. The contractor agrees. The contract is awarded and the contractor pays the official.

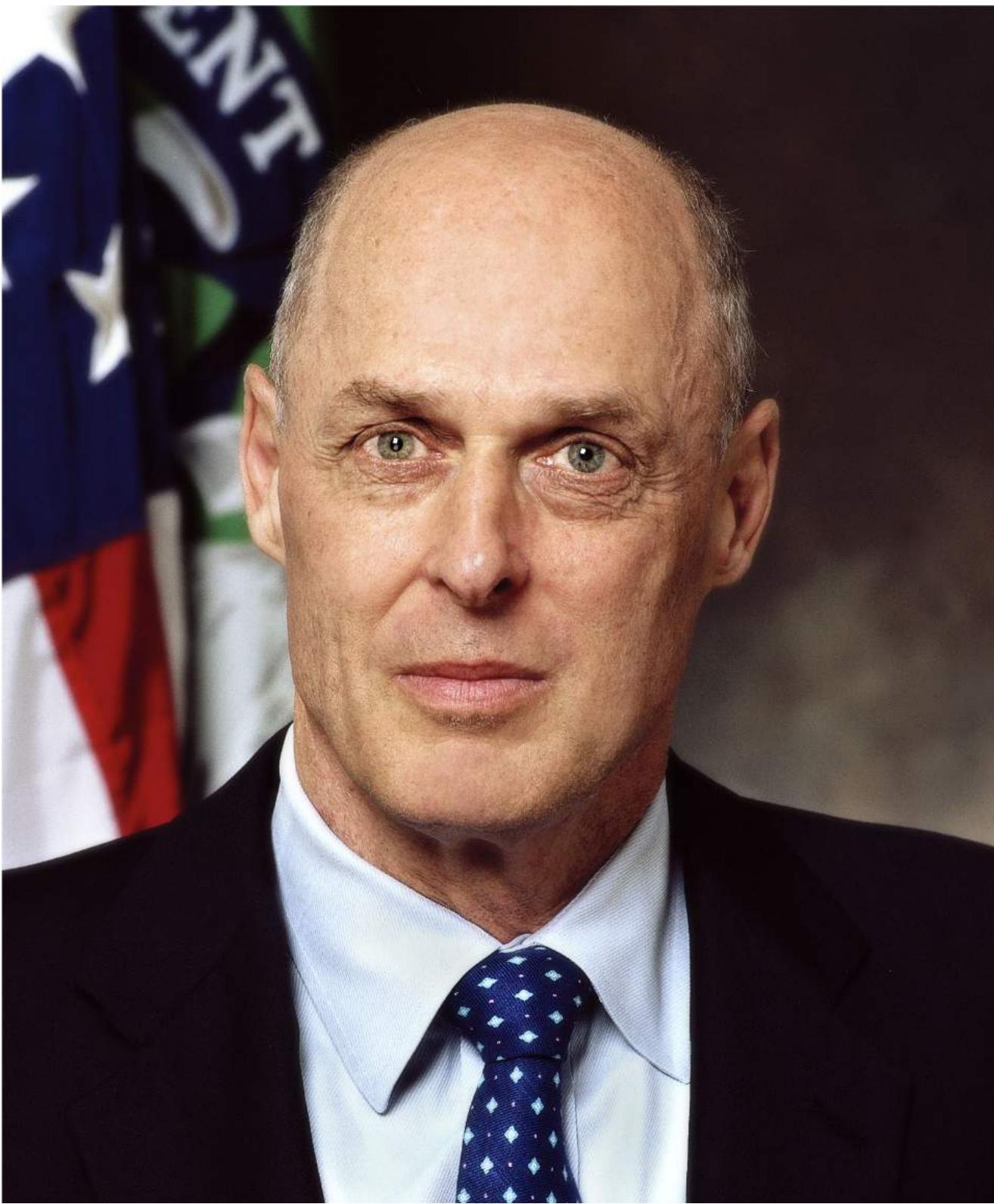
*Possible offenders:* Government official, contractor, and individuals involved.

# Raiffeisen



# Raiffeisen



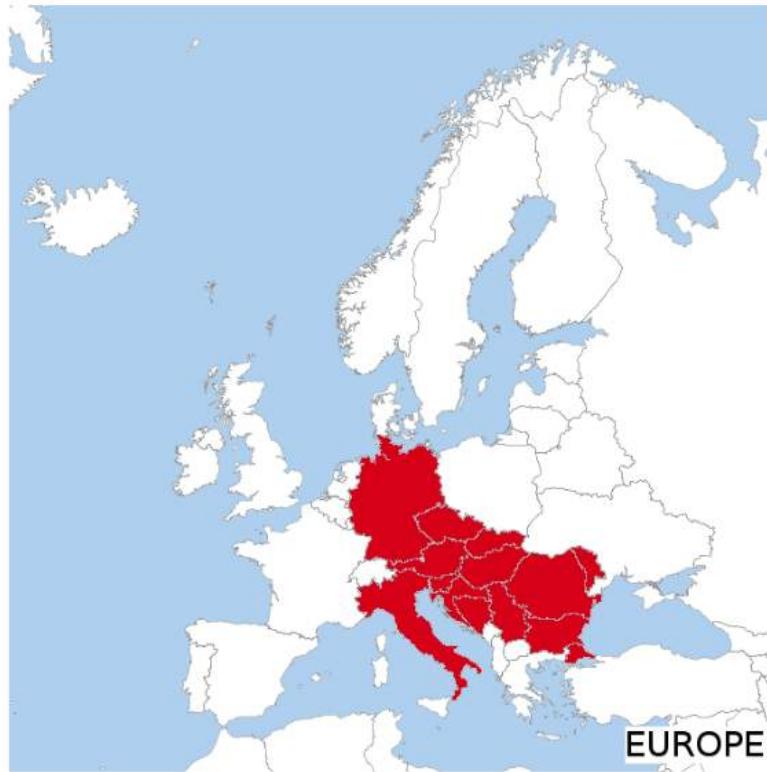






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OMV







# Vienna • Wien

Vienne • Wenen • Viena • Vídeň

Viedeň • Bécs • Wiedeń



# Stadt Wien



# www.antikorruption.wien.at

The screenshot shows a desktop browser window displaying the Wiener Antikorruptionsprogramm website at <http://www.wien.gv.at/verwaltung/internrevision/antikorruption.htm>. The page title is "Wiener Antikorruptionsprogramm". The header includes the "wien.at" logo, language links (english, bosanski, hrvatski, srpski, turkce), a search bar, and a menu bar with items like "Favoriten", "Vorgeschlagene Sitz", "Web Slice-Katalog", "Wiener Antikorruptionsprogramm", "Suche", "Adresssuche", "Fahrplanaufgabe", "Notrufe & Hotlines", and "Sicherheit". The main navigation menu has tabs: "Themen", "Virtuelles Amt", "Stadtplan", "wien.at TV", and "Mein Bezirk". Below the menu, there are several sections: "Bildung & Forschung", "Arbeit & Wirtschaft", "Gesundheit & Soziales", "Bauen & Wohnen", "Verkehr & Stadtentwicklung", "Umwelt & Klimaschutz", "Kultur & Freizeit", "Menschen & Gesellschaft", and "Politik & Verwaltung". A breadcrumb trail indicates the current location: "wien.at > Politik & Verwaltung > Intern Revision". On the left, a sidebar lists various administrative bodies and services. The central content area features a heading "Wiener Antikorruptionsprogramm" with three small images showing hands. Below the heading is a text block about corruption and its prevention, followed by links to "Korruptionsprävention in der Wiener Stadtverwaltung", "Eine Frage der Ethik – Handbuch zur Korruptionsprävention", "Links zum Thema Antikorruption", and the "Antikorruptionstelefon – 4000-82400". At the bottom, there's a "Top-Themen auf wien.at" section with thumbnail images.

# Eine Frage der **ETHIK**

Handbuch zur Korruptionsprävention

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