

Compliance Program Manual

Complete this manual to show how your organization identifies compliance obligations, governs conduct, handles concerns, and improves controls. Enter approved arrangements and evidence links; keep proposed controls distinct from adopted policy.

Complete bracketed fields with approved information. Duplicate modules and rows as needed; record the reason for any section marked not applicable.

Document [ID and revision] **Owner** [Role] **Scope** [Organization, site or product]

Effective date [Date] **Approval** [Controlled record] **Next review** [Date or trigger]

Program overview

Program boundary	Complete with approved information
Purpose and intended outcomes	[Why the program exists and what it seeks to prevent or detect]
Entities locations and people	[Covered entities, sites, worker groups and third parties]
Exclusions and interfaces	[Excluded activities, reason and related program]
Leadership commitment	[Approved wording and source document; do not sign for leadership]

Governance and oversight

Record authority as well as work performed. Identify access to oversight and any independence safeguards.

Role or body	Responsibilities and decisions	Reporting line and evidence
[Governing body]	[Oversight and decisions reserved]	[Report route and meeting record]
[Compliance function]	[Authority, independence, resources]	[Reporting and direct-access arrangement]
[Management or committee]	[Operational accountability]	[Escalation and resource decision record]

Compliance obligations and risk assessment

Document the rating method before applying it. Do not assign a risk rating until evidence and agreed criteria are available.

Assessment method	Definition or reference
Information sources and participants	[Obligation sources, interviews, prior cases and roles]
Likelihood and impact criteria	[Approved scale, thresholds and rationale]
Review cycle and change triggers	[Adopted frequency and triggering events]
Obligation and exposure	Control and assessment record
[Obligation ID, source, activity]	[Risk, rating rationale, control, owner role and evidence link]

Code of conduct and compliance policies

Repeat the policy record for each adopted topic. Keep rules separate from the steps that implement them.

Policy record	Complete for one policy
Title scope and source	[Policy ID, covered conduct and controlled document link]
Statements	[Exact approved must, must not, should or may wording]
Disclosure or approval	[Trigger, authority, record and related procedure]
Exceptions and consequences	[Approved rules and decision authority]

Training and communication

Audience and risk	Required learning and delivery	Assignment and evidence
[Role or population]	[Course, communication, format and adopted frequency]	[Owner, completion record and follow-up]
[Higher-risk role]	[Role-specific learning]	[Assessment and overdue escalation]

Reporting concerns and investigations

Reporting arrangement	Approved details
Channel and availability	[Verified channel, access instructions and contact]
Confidentiality anonymity and non retaliation	[Approved safeguards, limitations and policy link]
Intake and triage	[Responsible role, classification and escalation criteria]
Investigation and closure	[Independence check, evidence controls, outcome approval and records]

Investigation work record

1. Record [concern ID], [receipt time], [channel] and [allegation summary] in the authorized case record.
2. Document [conflict check], [safeguards], [triage decision] and [assigned investigator].
3. Record [evidence examined], [findings], [review decision] and [communications permitted].
4. Record [closure authority], [corrective actions] and [retention location].

Third parties and transactions

Review stage	Decision questions and evidence	Decision record
Before engagement	[Risk profile, due diligence sources and unresolved flags]	[Reviewer, approval and conditions]
Contract and onboarding	[Required terms, conduct expectations and training]	[Contract reference and owner]
Ongoing monitoring	[Checks, change triggers and escalation]	[Review result and follow-up]
Acquisition or transaction	[Pre-close issues and integration actions, if applicable]	[Decision authority and action tracking]

Incentives and discipline

Program element	Approved rule	Review and record
Positive conduct	[How conduct is recognized or assessed]	[Consistency review and evidence]
Alleged violation	[Fair review and decision process]	[Authority and case reference]
Confirmed violation	[Permitted consequence and factors considered]	[Decision basis and communication]

Monitoring auditing and program review

Control or measure	Test method and evidence	Review and action
[Control or program element]	[Sample, criterion, source, frequency]	[Result, reviewer and issue link]
[Metric]	[Definition, denominator and data source]	[Reporting audience and action threshold]

Remediation and continuous improvement

Finding and root cause	Corrective action	Completion and effectiveness
[Case or audit ID; evidenced cause]	[Action, accountable role and target date]	[Evidence, independent check and residual issue]

Appendices

Obligations register

Duplicate rows by obligation and retain the source version used for interpretation.

Obligation ID and source	Applicable activity and requirement	Control and evidence link
[ID, authority, version and clause]	[Applicability assessment and exact requirement]	[Policy, control, record and reviewer]
[ID]	[Requirement]	[Control and evidence]

Program review record

Review question	Conclusion and supporting record
Were material obligations and risks updated	[Evidence, gaps and decision]
Are reporting protections and channels working	[Checks, themes and unresolved issues]
Are controls training and resources adequate	[Tests, coverage and requested changes]
What changes were approved	[Decision, owner, due date and communication]

Forms records and definitions

Item or term	Purpose or definition	Controlled location and retention
[Case record or assessment form]	[Required content and access restriction]	[Repository, retention rule and owner]
[Program term]	[Approved meaning]	[Defining source]

Review and approval

☐ Obligation applicability, contact channels and policy language have been reviewed by the responsible functions.

☐ Cases, controls and training are traceable to records; unresolved gaps have owners.

Reviewer role	Review date and decision	Open actions and approval reference
[Role]	[Date; approved or returned]	[Actions and controlled approval]