

FULL SESSION REPORT

Anti-Corruption Partnership Network Event 2026

Advancing Anti-Corruption for Trust and Business Growth

Date	Friday, 18 September 2026
Programme	9.00 am to 12.00 pm
Coverage	Opening address, awards and commendations, three speaker presentations, panel discussion and closing remarks

Prepared from the event recordings. Remarks have been summarised and lightly edited for clarity while preserving the speakers' meaning, examples and emphasis.

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1. Executive summary

The event presented anti-corruption not merely as a legal or compliance requirement, but as a strategic condition for trust, investment and sustainable business growth. Across the opening address, speaker presentations, panel discussion and closing remarks, the central proposition was consistent: Singapore's reputation for integrity is a national asset, and protecting it requires shared ownership by government, businesses, trade associations, professional bodies and individuals.

CENTRAL MESSAGE

Integrity is both a safeguard and a source of competitive advantage. It must be translated into practical systems, everyday decisions and visible leadership behaviour.

Key messages

- **Singapore's trust advantage must be actively protected.** A strong reputation for incorruptibility gives investors and business partners confidence in Singapore's institutions, contracts and operating environment. Speakers cautioned that this standing is not permanent.
- **Private-sector vigilance remains essential.** The opening address noted that 84 of the 90 individuals prosecuted in 2025 for corruption-related offences investigated by CPIB were from the private sector. Construction, manufacturing, transportation and storage were highlighted as industries exposed to recurring risks.

- **Governance is a business fundamental.** Good controls reduce disruption, protect reputation, improve decision-making and support access to customers, tenders and trusted partners. Weak governance can impose far greater costs than prevention.
- **Practicality matters, particularly for SMEs.** Foundational measures need not begin with a complex certification programme. Clear expectations, conflict-of-interest declarations, segregation of duties, documented decisions, basic third-party checks and safe reporting channels provide a workable starting point.
- **Leadership must be tested in real decisions.** Tone from the top is credible only when leaders back employees who raise concerns or choose the ethical course despite cost, delay or commercial pressure.
- **ISO 37001 can add value beyond certification.** Seatrium's experience showed how the standard can support group-wide consistency, external scrutiny, continuous improvement, common training and stronger integration after a merger.
- **Integrity must extend through the supply chain.** Large companies and industry leaders can raise standards by communicating expectations, obtaining declarations, embedding supplier codes of conduct, providing training and conducting proportionate audits.
- **Prevention works best through partnership.** CPIB signalled a deliberate expansion from an enforcement-centric image towards deeper partnership and prevention, including sector engagement, practical resources and an expanding ACPN network.

Practical actions highlighted

1. **Review the highest-risk processes.** Start with procurement, conflicts of interest, approvals, variations, certifications, payments and the use of intermediaries.
2. **Assign accountable owners.** Controls are ineffective when everyone assumes that responsibility sits elsewhere.
3. **Create a trusted speak-up route.** Make reporting accessible, protect those who raise concerns and remove disincentives to speaking up.
4. **Build integrity into routine management.** Use short 'compliance moments', anonymised case studies, regular management discussions and performance expectations.
5. **Cascade standards to third parties.** Communicate, obtain commitments and verify implementation rather than accepting policies at face value.

2. Programme and speakers

Time	Programme
9.00 am	Opening Address by Guest-of-Honour — Mr Desmond Tan, Senior Minister of State, Prime Minister's Office
9.15 am	Commendation and Awards Presentation
9.40 am	Driving Business Value Through Integrity — Mr Jeffrey Wang, Deputy Director, Strategy Office, Corrupt Practices Investigation Bureau
10.00 am	Break
10.30 am	Built on Trust, Shared by All — Mr Lee Kay Chai, President, Singapore Contractors Association Limited
10.50 am	ISO 37001: Not Just a Certification but a Value-Add to Business — Mr Nicholas Choo, Vice President, Compliance, Seatrium Limited
11.10 am	Panel Discussion: Advancing Anti-Corruption for Trust and Business Growth — moderated by Ms Jacqueline Chow
11.50 am	Closing Remarks — Mr Sam Tee, Director, Corrupt Practices Investigation Bureau
12.00 pm	Buffet Lunch and Networking

3. Opening address

Mr Desmond Tan, Senior Minister of State, Prime Minister's Office

Mr Tan opened by thanking CPIB for convening the Anti-Corruption Partnership Network (ACPN), describing it as an important community of companies, trade associations, professional bodies and industry partners united by a common purpose: strengthening Singapore's resilience against corruption. He stressed that government cannot achieve this alone. The network enables participants to track emerging risks, exchange practices, raise standards and build a stronger culture of business ethics and corporate integrity.

Trust as Singapore's strategic advantage

Against a backdrop of global conflict, trade barriers and weakening trust, Mr Tan argued that Singapore's reliability matters more than ever. Singapore's position as a global hub for business, finance and supply chains rests on the rule of law, strong institutions, honoured contracts and commitments that are kept. Trust therefore gives Singapore a strategic advantage: it supports investment, cross-border partnerships and access to global markets. Zero tolerance for corruption is central to preserving that advantage.

He referred to Singapore's third-place position globally and first-place standing in Asia-Pacific in the 2025 Transparency International Corruption Perceptions Index. While encouraging, he cautioned that this position is not permanent and must be continually earned.

Integrity and business growth

Addressing the event theme, Mr Tan challenged the view that anti-corruption measures merely slow business or add cost. In his assessment, the equation should be reversed: companies with strong governance are better able to manage risks, attract trusted partners and sustain growth. Prevention is most effective before an incident occurs, particularly because investigations can create legal, operational and reputational consequences far beyond the initial misconduct.

Why the private sector must remain vigilant

Mr Tan cited CPIB's 2025 statistics: of 90 individuals prosecuted for corruption-related offences investigated by CPIB, 84 were from the private sector. Over the previous decade, construction, manufacturing, transportation and storage were among the industries most vulnerable to private-sector corruption. He encouraged every organisation to adopt a proactive posture and noted that CPIB offers practical resources to help companies assess risks, review policies and strengthen controls.

Shared responsibility across the ecosystem

- **Business leaders and boards** should ask compliance teams what risks concern them, what gaps exist and what support is required.
- **Compliance practitioners** should use CPIB's resources to conduct honest reviews and bring findings to leadership for constructive discussion.
- **Trade associations and professional bodies** should translate broad principles into sector-relevant guidance, especially for members with limited resources.
- **Larger companies and industry leaders** should share implementation experience and practical lessons so that standards rise collectively.
- **Individuals** should recognise that integrity is often expressed through ordinary choices: questioning a suspicious transaction, refusing an improper request or speaking up when something feels wrong.

Recognition of partners and individuals

Mr Tan recognised the Institute of Singapore Chartered Accountants (ISCA) as the recipient of the CPIB Star Partner Award for its longstanding work in professional training, capability building, outreach, forensic accounting, internal controls and good governance. He also recognised the Singapore University of Social Sciences (SUSS) with the CPIB Appreciation Award for the Red Claw Integrity Project, a digital business self-assessment tool based on CPIB's PACT guide and enhanced with artificial-intelligence capabilities.

He further commended 19 individuals who had rejected bribes in the course of their duties. Two examples illustrated that integrity is demonstrated through concrete action: a traffic police officer who rejected an alleged cash offer intended to avoid reporting an unauthorised cross-border ride-hailing case, and an enforcement officer supporting the National Environment Agency who rejected cash offers on two separate occasions. Mr Tan concluded with a shared call to assess risks, act on gaps and raise standards across each participant's network.

4. Commendations and awards

The formal presentation recognised organisations and individuals that had demonstrated sustained support for anti-corruption efforts or personal integrity in the course of official duties.

Recognition	Basis
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Recognition	Basis
CPIB Star Partner Award	Institute of Singapore Chartered Accountants, for close collaboration, professional capability building and advocacy for strong governance and anti-corruption practices.
CPIB Appreciation Award	Singapore University of Social Sciences, for its partnership and the Red Claw Integrity Project developed in connection with the 2025 Coding for Integrity initiative.
Individual commendations	Nineteen recipients from enforcement and public-service organisations were recognised for rejecting bribes and upholding integrity while carrying out their duties.

The segment reinforced an important theme of the event: anti-corruption depends on the entire ecosystem, from institutions and organisations to individuals making the right decision at the point of pressure.

5. Driving Business Value Through Integrity

Mr Jeffrey Wang, Deputy Director, Strategy Office, CPIB

Mr Wang structured his presentation around four questions: how CPIB assesses Singapore's corruption situation; why integrity should be central to business strategy and structure; where corruption risks commonly arise; and what practical support is available to organisations.

How CPIB assesses the corruption situation

CPIB uses several complementary data points rather than a single measure:

- **Operational statistics:** corruption-related reports received and cases registered. Comparing two five-year periods, CPIB observed a reduction in the average number of registered cases in the more recent period.
- **Domestic public-perception research:** the latest survey recorded a 98% favourable assessment of Singapore's corruption situation. Mr Wang noted that alignment between case data and public perception gives greater confidence than either measure alone.
- **International indices:** the Transparency International Corruption Perceptions Index remains a widely cited reference point despite methodological limitations and its focus on perception.

He read Singapore's strong performance as evidence of global regard and trust in the country's values and operating environment. Investors expect rules to be transparent and fair and expect value not to be eroded by improper payments. This reputation was built through sustained commitment and must be safeguarded collectively.

Strong governance as competitive advantage

Mr Wang acknowledged that governance requires attention, time and resources, but argued that it should be treated as a business fundamental rather than an administrative burden. Investors value certainty; an ecosystem founded on trust and transparency creates the confidence needed for long-term commitments. Strong controls also enable organisations to identify warning signs earlier, when intervention is less complex and less costly.

- Audits, analytics and monitoring can reveal abnormal patterns.
- Whistleblowing channels can surface issues that formal reporting lines miss.
- Clear decision rights and segregation of duties reduce the opportunity for one person to control an entire transaction.
- Governance should create the conditions for sound decisions, not simply prevent adverse outcomes.

Recurring risk factors and case lessons

Construction, manufacturing, transportation and storage were highlighted as industries with recurring private-sector corruption exposure. Common characteristics include large and diverse workforces, layered subcontracting, high-value transactions and significant time or operational pressure. The recurring weaknesses observed in cases included:

- Concentrated authority and poor segregation of duties.
- Front-line staff exercising significant discretion without adequate oversight.
- Undeclared gifts, loans, favours or personal relationships.
- Procurement controls that appear compliant on paper but are not tested for substance.
- A weak speak-up culture or the absence of a safe and accessible reporting channel.

The examples shared showed how these weaknesses can affect safety, procurement and payments. In one construction case, safety personnel allegedly solicited bribes to overlook worksite safety lapses. In another, lifting-team personnel allegedly accepted bribes in connection with assessments, resource allocation and approvals. Mr Wang emphasised that employees below senior-management level may hold substantial operational discretion and therefore require appropriate checks.

He also cautioned that obtaining three quotations does not by itself create genuine competition. If one person sources the quotations, recommends the award and effectively controls approval, the process may be merely procedural. Corruption exposure can continue after a tender is awarded, through purchase orders, variations, progress claims, invoices and payment certification. One example described benefits provided after a subcontract was awarded, followed by 29 purchase orders worth about S\$1.7 million over two years. Other cases involved false invoices and marked-up purchase orders.

KEY CONTROL PRINCIPLE

Procurement integrity is an end-to-end process — from sourcing and award through delivery, certification and payment. Controls must be tested for substance, not treated as documents to be filed.

CPIB support and implementation resources

Mr Wang introduced CPIB's Anti-Corruption Toolkit (ACT), organised around four areas:

6. **Awareness and education** — foundational understanding of anti-corruption law and responsibilities.
7. **Policy and practice** — tools to establish frameworks, procedures and internal capabilities.
8. **Sector-specific support** — cases and resources curated for higher-risk sectors.
9. **Reporting and whistleblowing** — guidance on reporting channels, anonymous complaints and whistleblower protection.

The toolkit includes ready-to-use posters, infographics and videos. Some materials have been translated into Chinese, Tamil, Bengali and Thai so that messages can reach workers who may not be proficient in English.

The refreshed PACT resource includes an Essentials checklist for organisations beginning to formalise anti-corruption measures and an Enhanced checklist for organisations strengthening compliance or working towards ISO 37001. For organisations ready to pursue certification, Mr Wang described ISO 37001 as a recognised framework and a useful business credential. He also noted that Enterprise Singapore's Enterprise Development Grant may defray up to 50% of qualifying additional costs for first-time adoption, including consultancy, training and certification.

He closed by describing Singapore's reputation for trust, integrity and incorruptibility as one of its greatest assets. Every business leader, employee, regulator, enforcement officer and citizen is a gatekeeper of the Singapore brand.

6. Built on Trust, Shared by All

Mr Lee Kay Chai, President, Singapore Contractors Association Limited

Mr Lee presented the construction industry as an ecosystem fundamentally built on trust. Clients, consultants, contractors, subcontractors, suppliers and the public depend on one another to deliver buildings and infrastructure properly and with integrity. Contractual documentation is necessary, but it cannot replace confidence in how decisions are made and obligations are fulfilled.

SCAL and the scale of the construction ecosystem

SCAL has represented Singapore's construction industry since 1937 and has about 3,000 member firms, supported by four subsidiaries. It connects contractors, clients and agencies; promotes standards and good practices; supports training and certification; and acts as a bridge between industry and government. Around 80% of its members are SMEs.

Mr Lee noted that strong construction demand translates into thousands of contracts, purchase orders, subcontracts and supply-chain relationships. Decisions about appointments, payments, certifications and approvals often involve substantial sums and public infrastructure or public money. The resulting risks are structural: layered subcontracting, high-value decisions, tight deadlines, frequent variations and routine approvals create multiple pressure points.

Two pillars: systems and people

Mr Lee organised the response around two mutually reinforcing pillars.

Pillar	Focus
Systems	Practical governance processes and internal controls: leadership expectations, conflict-of-interest declarations, segregation of duties, basic due diligence, documented decisions and safe reporting routes.
People	Personal accountability and ethical behaviour under pressure. Employees need clarity, support and confidence to make the right choice when deadlines, relationships or commercial interests create temptation.

For SMEs, controls must be simple and proportionate. Many construction companies do not have dedicated compliance teams, so expectations must be driven by owners, directors and senior managers and embedded in normal business processes. Mr Lee stressed that a company can have excellent procedures on paper, but the procedures will fail if its culture encourages people to bypass them. Conversely, well-intentioned employees still need structure and support to act consistently.

Where pressure arises

- Tender evaluation and award decisions.
- Selection of subcontractors and suppliers.
- Variations, claims and payment certification.
- Quality and safety inspections or approvals.
- Gifts, hospitality and entertainment.
- Compressed timelines that encourage shortcuts or incomplete documentation.

Weak governance can damage reputation, distort procurement, cause delay and waste, and reduce confidence among clients, investors and tender authorities. An investigation can place opportunities on hold even before any final legal

outcome. Improper procurement also disadvantages capable and honest firms and signals that success depends on relationships rather than capability, quality, professionalism and reliability.

The role of a trade association

Mr Lee distinguished the roles of regulator and association. Regulators enforce the law, investigate wrongdoing and set the baseline. An association can work upstream by shaping culture, promoting good practices and helping companies prevent problems. He proposed several areas where SCAL and CPIB could collaborate:

- More frequent joint outreach so members hear directly from CPIB.
- Simple guidance, checklists and templates for tenders, appointments, claims and payment certification.
- Use of real and anonymised case studies to make risks tangible and prevent repetition.
- Industry benchmarking and better data to track improvement over time.
- Recognition of companies and individuals that demonstrate strong compliance practices.

He also emphasised peer influence. Contractors listen to other contractors, subcontractors take cues from main contractors, and the expectations of clients, consultants and regulators flow through the value chain. Large and capable organisations can therefore raise standards well beyond their own operations.

Leadership and support for speaking up

Drawing on his own business experience, Mr Lee described situations in which employees had reported improper approaches. His response was to support the employee, reject the request and move on without yielding to pressure. The example illustrated a recurring point: employees are more likely to speak up when leaders demonstrate that the organisation will stand behind them. He encouraged leaders to discuss integrity regularly, reinforce standards and help employees reason through difficult decisions rather than merely issue instructions.

Mr Lee concluded that integrity and commercial success are not competing objectives. Trusted companies encounter fewer disputes and surprises, gain confidence from lenders, insurers and partners, and attract people who want to work where expectations are clear. A clean industry is a stronger and more competitive industry.

7. ISO 37001: Not Just a Certification but a Value-Add to Business

Mr Nicholas Choo, Vice President, Compliance, Seatrium Limited

Mr Choo shared Seatrium's practical experience of developing and integrating an ISO 37001 anti-bribery management system across a global organisation. Seatrium operates in the offshore, marine and energy sectors, has more than 60 years of track record, has delivered more than 1,300 projects and has a workforce exceeding 24,000. Its international footprint exposes it to markets with different laws, practices and corruption-risk profiles.

Why the journey mattered

The certification journey was framed against legacy compliance matters and regulatory settlements involving predecessor entities. Rather than conceal the difficulty, Mr Choo used that history to explain why the group invested in stronger controls and why it wished to share lessons so that other organisations could avoid similar pain. He described the present organisation as stronger because of the changes made.

Early implementation challenges

10. **Limited local certification capacity.** When the journey began, there was no Singapore certification body accredited for ISO 37001, creating practical uncertainty over who could certify the organisation.
11. **Inconsistent auditor approaches.** Potential certification bodies and auditors interpreted requirements differently; even gap analyses produced different findings.
12. **Alignment across regulatory expectations.** The programme had to stand up not only to ISO requirements but also to guidance and scrutiny in jurisdictions such as the United States and Brazil.
13. **Global versus local certification.** A single group certificate creates consistency but also means a failure in one location can put the global certificate at risk. Separate certificates reduce shared exposure but can create fragmented standards.
14. **Roll-out strategy and resources.** A global programme requires careful decisions about ownership, sequence, consultants, internal capability and long-term sustainability.

Certification and integration timeline

Period	Milestone
2018	Consultant and certification body appointed; Singapore business units achieved certification by year-end.
2019–2021	Certification expanded across additional operations, including global and Brazilian operations; internal capability was progressively developed and dependence on consultants reduced.
2023	The merger forming Seatrium created an integration challenge involving different cultures, policies, processes and certification arrangements.
November 2024	Seatrium achieved a single ISO 37001 certificate covering the group globally.
2025 onwards	Surveillance audits and continual improvement continued.

How Seatrrium integrated the programme

- **A clear identity and leadership direction.** A new group brand reduced the tendency to frame integration as one legacy organisation's system prevailing over another's.
- **Monthly senior-management oversight.** A central compliance committee comprising C-suite leaders was established and continued to meet monthly.
- **One group policy architecture.** The group moved towards common policies, a single whistleblowing hotline and consistent expectations.
- **Mandatory group-wide training.** Training covered all employees, including workers, and addressed anti-bribery expectations, gifts and entertainment, and reporting routes.
- **Standardised controls with proportionate implementation.** Common principles were applied throughout the group while allowing smaller or different business units to implement controls appropriate to their operations.
- **Cross-business-unit audits.** Internal teams learnt from one another, shared practices and supported consistency before external certification audits.

Value added by ISO 37001

Mr Choo was clear that certification is not an end in itself. Its value lies in the management discipline and scrutiny surrounding it:

- A recognised structure containing the principal elements of a robust anti-bribery compliance programme.
- External assessment by an accredited certification body, reducing the risk of internal complacency.
- A comprehensive review of processes, risks and controls, with findings that must be addressed.
- A common language and approach across business units and countries.
- Continuous-improvement expectations rather than a one-time policy exercise.
- A credible response to customer due-diligence questionnaires and tender requirements.

Implementation lessons

- **Risk assessment should involve the ground.** Departments closest to operations understand their risks best; central teams should provide a consistent method and challenge function.
- **Policies are insufficient without awareness.** A supplier may readily produce a policy, yet employees may not know it exists. Training, communication and verification are therefore essential.
- **Use regular 'compliance moments'.** Short discussions in ordinary meetings can keep compliance visible in the same way safety moments keep safety front of mind.
- **Consultant advice must be sustainable.** Organisations should build internal capability and adopt measures that remain workable after external consultants leave.
- **Real buy-in is revealed when pressure arises.** Leadership commitment is tested when doing the right thing creates delay, cost or the risk of losing an opportunity.
- **Continual improvement is necessary.** Different auditors and reviewers may identify different opportunities; this diversity of challenge can strengthen the system.

8. Panel discussion

Advancing Anti-Corruption for Trust and Business Growth

The panel was moderated by Ms Jacqueline Chow and brought together Mr Jeffrey Wang, Mr Lee Kay Chai and Mr Nicholas Choo. The discussion moved from foundational safeguards to practical pressures, leadership behaviour, supply-chain responsibilities and immediate actions for organisations.

8.1 Foundational safeguards for every company

Asked what every organisation should have regardless of size, Mr Wang identified three essentials:

15. **Clear rules and processes in the highest-risk areas**, including procurement and conflict-of-interest management.
16. **Segregation of duties and defined approval boundaries**, with a clear escalation and authorisation route for exceptions.
17. **A safe whistleblowing or speak-up channel**, because employees on the ground are often the earliest and richest source of warning signs.

He stressed proportionality and sustainability. A sophisticated policy that cannot be implemented is less useful than a focused control that works in practice.

8.2 Practicality for SMEs and pressure on the ground

Mr Lee explained that most SCAL members are SMEs with lean teams and limited dedicated compliance resources. The starting point is therefore not a complex framework, but leadership clarity and a repeatable process. Construction teams routinely face compressed timelines and pressure to keep projects moving, which can encourage shortcuts. Owners and senior managers must make clear whether the organisation intends to grow through capability and integrity or accept actions that could damage its future.

Mr Choo agreed that organisations unable to pursue certification immediately should prioritise tone from the top, clear policies and processes, and a channel through which employees can raise concerns without fear.

8.3 Raising standards through suppliers and partners

Seatrium's approach combines three layers: communication and training for suppliers; declarations and commitments to a supplier code of conduct; and proportionate audits to verify that commitments are implemented. The panel emphasised that signatures alone do not prove effectiveness. Human engagement and verification are both necessary.

Mr Lee added that the construction sector has become much more professional and regulated over the past three decades. Industry standards, codes of practice and management systems have improved documentation and accountability, but the work of reinforcing trust and raising capability must continue.

8.4 Does compliance create tangible business value?

An audience member from Norton Rose Fulbright asked whether a strong compliance posture had produced direct commercial value, such as access to projects or tenders.

- **Seatrium:** customer due-diligence questionnaires increasingly require evidence of anti-bribery policies and compliance programmes. In the offshore, marine, oil and gas, and renewables sectors, the absence of such measures can prevent a company from qualifying for work.
- **Construction sector:** for larger contractors, quality-based procurement and tender evaluation increasingly consider governance, compliance and certification capability. Smaller firms may face greater cost and capability constraints, so the industry must raise standards progressively and proportionately.
- **CPIB perspective:** the broader objective is a consistent ecosystem in which responsible conduct is expected, recognised and reinforced by government, customers and larger companies.

8.5 Maintaining Singapore's standing

An ISCA representative asked how Singapore could maintain or improve its third-place standing. Mr Wang noted that the Corruption Perceptions Index is perception-based and influenced by a range of institutional indicators. Maintaining performance therefore requires government officials and businesses to uphold standards consistently, understand the

risks associated with their roles and apply effective preventive measures. Breaches affect perceptions even when they are isolated.

Mr Choo added that Singapore companies operating abroad still carry the Singapore brand. A group-wide policy gives employees a clear basis for refusing practices that may be locally common but inconsistent with the organisation's standards. Local legal advice can help identify a lawful route without compromising core principles.

From the trade-association perspective, Mr Lee proposed stronger partnership with regulators, industry benchmarking, peer learning and recognition of organisations that demonstrate good practice. Larger companies can establish examples that smaller firms and supply-chain partners can follow.

8.6 Recognition, incentives and speaking up

An audience member from Singapore Power asked how organisations could use incentives, particularly when reporting may affect commercial relationships or create perceived repercussions. Mr Wang clarified that the first objective is often to remove disincentives: make reporting easy, credible and safe, and ensure that employees are not penalised for surfacing concerns.

Mr Choo suggested that integrity can be embedded in balanced scorecards or performance assessments, influencing recognition, promotion and reward without requiring public disclosure of sensitive cases. Ms Chow noted that some organisations already assess behaviour against core values in performance management.

8.7 What credible leadership looks like

The panel agreed that employees judge leadership by decisions, not statements. Mr Lee described coaching an employee to assess whether a proposed act was right or wrong, helping build judgement rather than dependency on permission. Leaders must themselves model the conduct they expect.

Mr Choo highlighted the value of anonymised internal case studies. Sharing what occurred, how management responded and what was learnt demonstrates that the organisation supports employees who make the right call. Repeated communication also makes people more willing to speak up.

8.8 Warning signs requiring a pause

Mr Wang identified several warning signs that do not necessarily prove corruption but should trigger review:

- Unexplained urgency or secrecy.
- A sudden change in the bank account designated for payment.
- Requests for unusual autonomy or bypassing normal oversight.
- The unexpected introduction of an unfamiliar intermediary.

Where such signs arise, organisations should pause, escalate the matter, preserve relevant documents, check the process and decision-makers, and proceed only when satisfied that it is safe and proper to do so.

8.9 One action within the next 30 days

Panellist	Recommended immediate action
Mr Jeffrey Wang	Review the most vulnerable processes, appoint a senior accountable owner, prioritise the areas requiring attention and set clear, achievable timelines.

Panellist	Recommended immediate action
Mr Lee Kay Chai	Establish or refresh a basic anti-corruption policy and discuss real cases with employees and industry peers so that integrity becomes a normal part of business conversation.
Mr Nicholas Choo	Begin regular communication immediately. Share the lessons from the event, create recurring compliance moments and avoid treating integrity as a once-a-year speech or statement.

9. Closing remarks

Mr Sam Tee, Director, Corrupt Practices Investigation Bureau

Mr Tee thanked participants for staying through the event and acknowledged both longstanding and new ACPN members. He returned to a question he had posed since joining the Bureau: what value should CPIB create for participating members, and why should they remain active in the network?

A more difficult global environment

He placed Singapore's anti-corruption work in a wider context of war, geopolitical instability and weakening international order. In many countries, corruption has received less attention and scores have declined. This can make international cooperation on investigations more difficult. At the same time, it increases the value of Singapore's reputation as a trusted, safe and secure place to conduct business.

Singapore's score of 84 and third-place ranking should therefore be understood not simply as a Bureau achievement, but as an asset for Team Singapore. If Singapore remains trusted and prosperous, multinational corporations, SMEs and smaller businesses all benefit; so do future generations. Improving Singapore's standing is a shared national endeavour.

Growing the partnership

Mr Tee said CPIB would continue expanding ACPN membership because the scale of the partnership matters. More members mean more ideas, more practical experience and wider sharing of good practices. He also clarified that outreach to more vulnerable sectors is intended to provide help, not to target companies. CPIB has finite resources and therefore seeks to direct preventive support where it can make the greatest difference.

Practical value for ACPN members

CPIB intends to provide ACPN members with access to a growing repository of practical resources. These will support governance and planning as well as day-to-day prevention messaging. Posters, short videos and concise materials will be designed for easy sharing through internal channels such as WhatsApp and Telegram, reflecting the need for short and usable content that keeps communication active.

At a more strategic level, CPIB is considering how participation could bring meaningful recognition or business value. Possible ideas include branding or a form of certification, although Mr Tee cautioned that a model such as CaseTrust may not suit every organisation. He invited candid feedback on what would help, what would create unnecessary burden and what would be workable in practice.

He also addressed the possibility of recognising private-sector individuals who reject bribes, while acknowledging that some may not wish to be publicly identified. The point was left as an area for deeper consultation rather than a predetermined scheme.

From enforcement to partnership and prevention

Mr Tee acknowledged that CPIB has traditionally been seen primarily as an enforcement body and that association with the Bureau may cause some companies to worry that they are being singled out. While enforcement remains essential, he emphasised that prevention and partnership are no less important. CPIB's starting point is to help organisations protect their business and strengthen their systems, and more resources have been allocated to preventive work.

CLOSING EMPHASIS

The stronger Singapore's organisations are at preventing corruption, the stronger they become individually, as sectors and as Team Singapore.

10. Consolidated takeaways and action agenda

For boards and senior management

- State clear expectations and demonstrate them in decisions involving cost, delay and commercial pressure.
- Identify the processes with the greatest corruption exposure and assign named accountable owners.
- Ensure exceptions to normal processes are documented and approved at the right level.
- Ask employees and compliance teams what concerns them and what support they need.
- Protect and recognise employees who raise concerns or refuse improper requests.

For compliance, risk and operational teams

- Test whether controls work in substance rather than checking only that policies exist.
- Use data, audit and transaction reviews to identify unusual patterns.
- Make whistleblowing routes accessible, trusted and appropriate for the workforce.
- Train employees using realistic scenarios and anonymised internal cases.
- Preserve records and pause transactions when warning signs arise.

For trade associations

- Translate general anti-corruption principles into sector-specific checklists, templates and scenarios.
- Create regular platforms for regulators, large companies and SMEs to exchange practical experience.
- Use anonymised case studies and sector data to benchmark risks and improvement.
- Encourage peer leadership and recognise credible good practice.
- Help smaller firms adopt proportionate controls without turning governance into an inaccessible programme.

For larger companies and supply-chain leaders

- Communicate anti-bribery expectations clearly to suppliers and subcontractors.
- Use supplier codes, declarations and contractual commitments, but verify implementation through engagement and audit.
- Share tools, examples and training with smaller partners.
- Apply consistent principles across countries while seeking local legal guidance where necessary.

Suggested 30–90 day sequence

Period	Focus
First 30 days	Select two or three high-risk processes; appoint accountable owners; confirm reporting channels; conduct one leadership-led compliance moment; and communicate key red flags.

Period	Focus
Days 31–60	Review conflicts, approval limits and segregation of duties; test a sample of procurement and payment transactions; refresh supplier declarations; and gather employee feedback.
Days 61–90	Close priority gaps; share anonymised lessons; set a recurring training and communication rhythm; and decide whether PACT, ISO 37001 or other structured support is appropriate.

Final observation

The event's most consistent lesson was that integrity becomes commercially meaningful only when it moves from policy into behaviour. Singapore's reputation provides a powerful platform for companies operating locally and internationally, but the reputation is renewed through thousands of ordinary decisions: how contracts are awarded, how exceptions are handled, whether employees speak up, whether leaders support them and whether organisations learn before misconduct becomes a crisis.