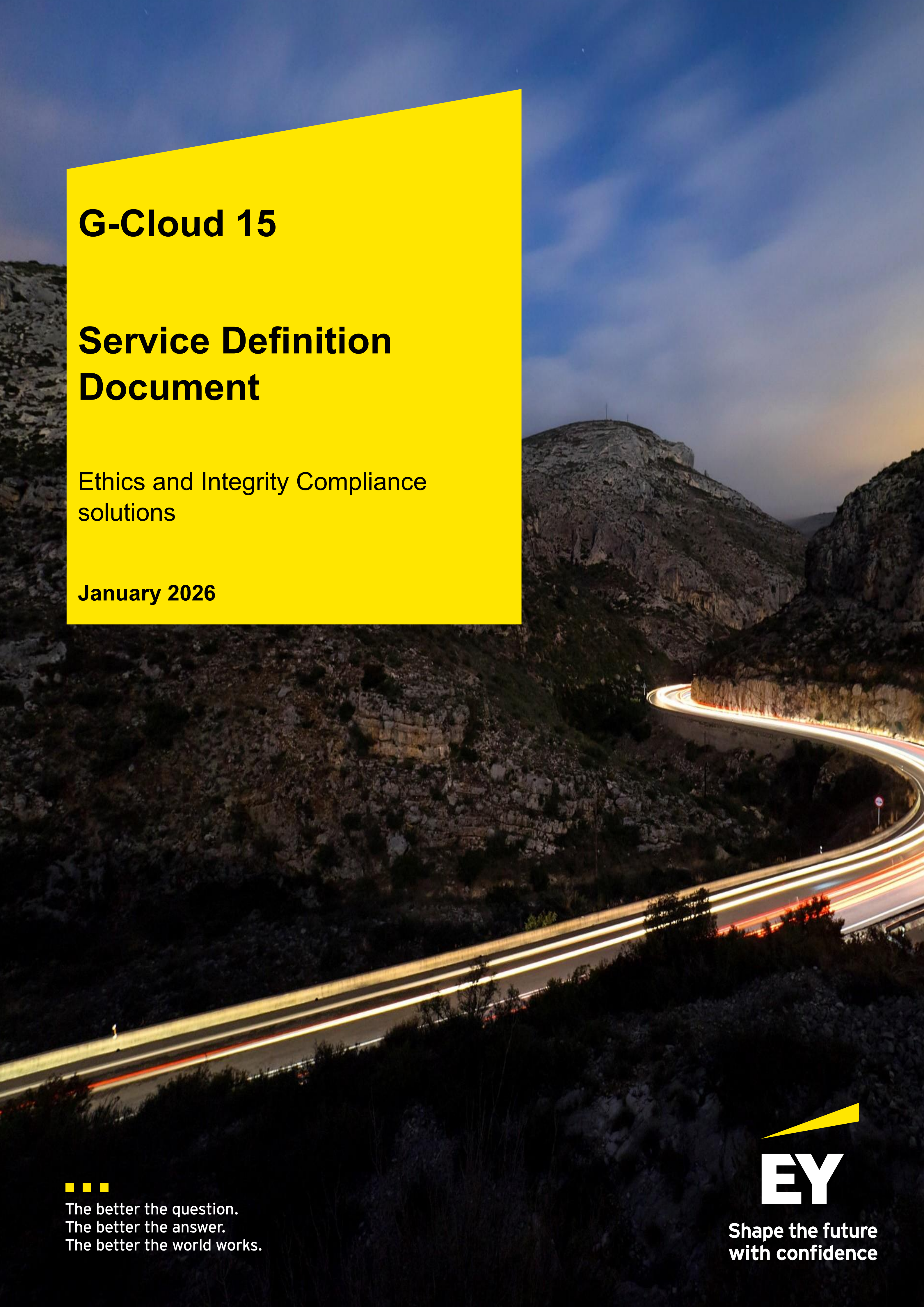

G-Cloud 15

Service Definition Document

Ethics and Integrity Compliance solutions

January 2026

The better the question.
The better the answer.
The better the world works.

Shape the future with confidence

Contents

1. Service detail

Successful organisations depend on their reputation for keeping promises, respecting laws and behaving ethically to maintain stakeholder trust. EY Forensic & Integrity Services professionals help organisations protect and restore enterprise and financial reputation. We assist companies and their legal counsel to investigate facts, resolve disputes and manage regulatory challenges. We put integrity at the heart of compliance programs to help better manage ethical and reputational risks. We use cloud, technology and AI as the foundation of all our services to leverage the power of data, enhance productivity and improve accountability.

As public scrutiny heightens, with increasing expectations to provide taxpayer value for money, government organisations must implement robust **ethics and integrity compliance programmes** to safeguard its reputation and encourage ethical and transparent operations. These programmes form the foundation of good governance, guiding decision-making and aligning with the UK Civil Service values of **honesty**, **integrity**, **impartiality** and **objectivity**.

A modern ethics and integrity compliance programme must go beyond policies. It should integrate prevention, detection, and response, supported by technology data-driven insights and embedded into day-to-day operations.

Common ethics and integrity risks may include:

- Fraud - Misappropriation, misrepresentation or abuse of position
- Bribery and Corruption – e.g., Conflicts of interest
- Sanctions
- Money Laundering
- Market abuse – e.g., insider trading
- Facilitation of tax evasion
- Illegal activity/Misconduct
- Whistleblowing reports
- Internal policy and control breaches
- Improper conduct by third parties

Organisational challenges

In response to the above challenges, organisations must demonstrate proactive, reasonable procedures to prevent misconduct and maintain trust. Failure to do so can result in loss of public trust and reputational damage.

Organisations face four critical challenge areas regarding ethics and integrity:

1. **Risk and Compliance Management**: There are expectations from the public for organisations to actively prevent, detect and respond to fraud, bribery, corruption and unethical behaviour. Robust management of these risks requires a holistic risk assessment and controls in place which are effective in design. Many organisations still rely on static controls that fail to detect collusion or circumvention.
2. **Third-Party Risk Management (“TPRM”):** Taxpayers demand accountability and transparency in activities conducted by government, including interactions with third parties and across the supply chain. Limited visibility over third parties could create blind spots for bribery, corruption, and tax evasion risks.
3. **Continuous monitoring:** Compliance programmes must demonstrate practical effectiveness and continuously apply learnings to further develop existent controls. Static programmes cannot meet expectations for ongoing monitoring and evidence of control performance.

4. **Whistleblowing (Speak-up):** Stakeholders expect trusted, accessible reporting channels and timely investigations. Weak frameworks or poor case handling undermine compliance and culture.

Our integrated solution

As public organisations navigate a complex landscape of compliance risks and ethical expectations, it must respond to evolving threats such as sophisticated fraud and behavioural misconduct. An effective ethics and integrity compliance programme not only safeguards reputation but also encourages confidence among management, stakeholders, and taxpayers that the organisation operates with integrity and transparency.

EY helps organisations address ethical, integrity and compliance challenges through an integrated framework aligned to EY's Business Conduct and Ethics framework. Our approach combines Risk Management, Policies and Training, Third-Party Risk Management, Monitoring and Speak-up into an integrated programme that delivers measurable outcomes and compliance with stakeholder expectations.

Recognising that no single design fits all, it is crucial to tailor programmes to reflect unique risk profiles, operational models and organisational structures. As an independent advisor with experience working with organisations to develop its compliance programmes, EY can help government and other public bodies to implement industry compliance practices which add value for money, while fostering a culture of integrity that resonates throughout the organisation.

EY can assist with the following offerings:

1. **Risk management and wider framework support:** Help organisations to conduct activities that helps to prevent, detect and respond to ethics, compliance and integrity risks.

- **Current state assessment of framework:** A facilitated workshop with key stakeholders to assess the current state of the ethics and integrity compliance programme, identifying and prioritising areas for improvement.
- **Risk assessments:** Structured workshops to define risk appetite thresholds, identify and assess risks, and agree remediation plans.
- **Controls mapping:** Assess the design and operating effectiveness of preventive and detective controls, mapping to identified risks.
- **Policy and procedures:** Support with relevant policies which serve as practice guidance for employees, such as fraud, bribery and corruption policies. This could be through assessment or drafting of policies.
- **Training:** Develop role-specific training content with additional tailored content for employees in high-risk exposure roles e.g. finance, treasury, and procurement.
- **Thematic reviews:** Deep dive reviews into high-risk areas such as procurement, grants/loans, payroll, vendor master database and travel & expenses, to identify vulnerabilities and recommend improvements.

2. **Third-Party Risk Management ("TPRM"):** Manage third-party and supply chain exposure such as the risk of engaging with entities involved with sanctions, politically exposed persons ("PEPs"), unclear beneficial ownership structures and other ethical risks.
    - **TPRM framework build/uplift:** Build and implement a TPRM framework (in whole or in part), including design and implementation of risk-tiered due diligence ("DD"), and onboarding/renewal controls.
    - **Third-party risk assessments:** Ongoing refresh of inherent and residual risk assessments including focus on geo-political triggers, ESG compliance and modern slavery indicators.
    - **Integrity due diligence:** Conduct diligence on entities and individuals using open-source intelligence, specialist databases, regulatory watchlists, and proprietary tools. Apply targeted enhanced due diligence when risk thresholds are met to identify red flags and mitigate reputational risks.
    - **Managed Services hub:** Provide scalable due diligence services to reduce cycle time, cost, and administrative burden.
    - **Forensic contract review:** Analyse payments data to identify overpayments, value leakage, and non-compliance with contracts, and recommend control improvements.

3. **Monitoring:** Implement a robust monitoring approach using technology such as AI, to identify and detect misconduct.
    - **Data analytics-enabled monitoring:** Apply forensic data analytics to transaction testing and operational data to detect anomalies, control gaps, and potential indicators of breaches or misconduct across areas of high-risk exposure including finance and procurement.
    - **Develop Key Risk Indicators using outcome-based metrics:** Develop risk flags which flag potential unethical behaviour or non-compliance with organisation policies and procedures.
    - **Managed Services hub:** Provide scalable compliance monitoring services to improve visibility and management of risk across the organisation whilst reducing cost, and administrative burden to the business.
    - **Data visualisation solutions:** Develop dashboards which provide real-time insights for management and regulators, enabling proactive risk management.

4. **Whistleblowing (Speak-up):** Build trusted, technology-enabled routes for employees to speak-up with anonymity.
   - **Framework build and implementation:** Design and implement whistleblowing policies, procedures, governance structures, reporting lines, and training programmes.
   - **Tech-enabled Speak-up channels:** Develop bespoke whistleblowing solutions which include multi-language web/mobile portals, phone lines, anonymity options, and secure case management.
   - **Capability and maturity review:** Assess Speak up policies, governance, and culture against leading standards, and deliver a targeted roadmap to strengthen compliance.

Features and benefits of our risk management solution

The table below sets out the features and benefits of our ethics and integrity compliance solutions:

Benefits	Features
• Strengthens compliance management and governance, in line with taxpayer expectations • Aids recovery of taxpayer funds lost to fraud and error • Mitigates risk through an approach focusing on prevent, detect, respond • Manages risks including fraud, corruption, unethical behaviour, and policy breaches • Leverages data analytics to assess risk exposures, identifying anomalies • Improves visibility over ethical risks of engaging with third parties • Builds employee trust through secure, anonymous whistleblowing and reporting channels • Reduces time and cost via scalable managed services and technology • Access to subject-matter resources with deep industry knowledge • Enhances decision-making with timely and accurate insights	• Current state maturity assessment to identify gaps in compliance programme • Structured risk workshops and questionnaires for prioritisation and remediation planning • Data analytics-enabled risk monitoring • Risk-tiered third-party due diligence and onboarding/renewal control design • Detailed integrity due diligence using open-source and specialist databases • Independent third-party audits, investigations, and forensic contract reviews • Technology-enabled whistleblowing channels with secure case management • Scalable managed services for due diligence, monitoring, and compliance support • Bespoke solutions considering the organisational activities and risk profile

1.1. Pricing

Please refer to the attached pricing document.

2. Key contacts

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EY | Building a better working world

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Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

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