

Where does your company stand on countering bribery?

COMMITMENT

YES NO PARTLY PLANNING

- 1) Does your company have a published policy of prohibition of bribery in any form whether direct or indirect?

Kindly comment on above answer:

- 2) Has your company committed to implementing a Programme to counter bribery?

Kindly comment on above answer:

- 3) Is your Programme consistent with all laws relevant to countering bribery in each of the jurisdictions in which you operate?

Kindly comment on above answer:

IMPLEMENTATION

- 4) Is your Programme designed and improved on the basis of continuing risk assessment?

Kindly comment on above answer:

- 5) Does your Programme provide detailed policies and procedures to address the following:

- Conflict of interests?
- Bribes in any form?
- Political contributions?
- Charitable donations and sponsorships?
- Prohibition of facilitation payments?
- Gifts, hospitality and travel expenses?

Kindly comment on above answers:

- 6) Does your Board of Directors demonstrate visible and active commitment to the implementation of the anti-bribery Programme?

Kindly comment on above answer:

7) Is your CEO responsible for ensuring that the Programme is implemented consistently with clear lines of authority?

Kindly comment on above answer:

8) Does your Programme cover business relationships as follows:

- The Programme is implemented in all business entities over which your company has effective control?
- An equivalent Programme is encouraged in business entities in which your company has a significant investment or with which it has significant business relationships including joint ventures and consortia?
- The Programme requires agents, lobbyists and other intermediaries to agree contractually to comply with your company's anti-bribery policies and procedures and provides them with appropriate advice and documentation?
- The Programme is communicated to contractors and suppliers and your company works in partnership with major contractors and suppliers to help them develop their anti-bribery practices?

Kindly comment on above answers:

9) Does your company undertake properly documented, reasonable and proportionate anti-bribery due diligence on business entities when entering into a relationship?

Kindly comment on above answer:

10) Do your human resources practices reflect your company's commitment to the Programme?

Kindly comment on above answer:

11) Is the Programme communicated to:

- All Directors, managers and employees?
- Business associates?
- Other stakeholders?

Kindly comment on above answers:

12) Does your company provide secure and accessible channels through which employees and others can obtain advice or raise concerns ('whistleblowing') without risk of reprisal?

Kindly comment on above answer:

- 13)** Is tailored training provided to:
- All Directors, managers, employees and agents?
 - Where appropriate, contractors and suppliers?

Kindly comment on above answers:

- 14)** Are there internal controls to counter bribery comprising financial and organisational checks over accounting and record keeping practices and other business processes related to the Programme?

Kindly comment on above answer:

MONITORING AND REVIEW

- 15)** Are the internal control systems, in particular the accounting and record keeping practices, subjected to regular review and audit?

Kindly comment on above answer:

- 16)** Does your company perform reasonable and proportionate monitoring of its significant business relationships?

Kindly comment on above answer:

- 17)** Does your company have feedback mechanisms and other internal processes supporting the continuous improvement of the Programme?

Kindly comment on above answer:

- 18)** Is there regular assessment of the Programme by the leadership including:

- Monitoring and periodic review by senior management of the Programme's suitability, adequacy and effectiveness?
- Periodic reporting by management of the results of reviews to the Audit Committee or the Board with implementation of improvements as appropriate?
- An independent assessment by the Board of the adequacy of the Programme?

Kindly comment on above answer:

PUBLIC REPORTING

- 19)** Does your company publicly disclose information about the Programme including the management systems employed to ensure its implementation?

Kindly comment on above answer: