

## CI 2015 – QUESTIONNAIRE AND MODEL ANSWERS (QMA)

Pillar 1: Leadership, Governance and Organisation	
Leadership and Commitment	
A1	<p><b>Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?</b></p> <p>Guidance Notes: The assessor is looking for evidence of the strength of the company’s external commitment to its ethics and anti-corruption agenda through public statements from its leadership as opposed to, for example, internally published, non-public statements.</p> <p>Scoring Criteria:</p> <p><i>2: The CEO / Chairperson has issued at least one statement supporting its strong stance against corruption specifically in the last two years. Alternatively the CEO / Chairperson has made <b>several</b> strong statements that promote the company’s anti-corruption and ethics agenda, under which it is clear that anti-corruption is a significant component (as judged by review of the company’s ethics and anti-corruption policies).</i></p> <p><i>1: The CEO / Chairperson has issued at least one strong statement that promotes the company’s whole anti-corruption and ethics agenda in the last two years, under which it is clear that anti-corruption is a significant component (as judged by review of the company’s ethics and anti-corruption policies).</i></p> <p><i>0: There is no apparent support or only minor statements have been made by the CEO / Chairperson.</i></p>
A2	<p><b>Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?<sup>12</sup></b></p> <p>Guidance Notes: The assessor is looking for evidence of the level of personal commitment of the company’s leadership to its ethics and anti-corruption agenda through, for example, public speeches and interviews, personal involvement with industry anti-corruption initiatives, etc.</p> <p>Scoring Criteria:</p> <p><i>2: The CEO / chairperson has demonstrated active external engagement in anti-corruption matters on more than one occasion over the last two years.</i></p> <p><i>1: There is evidence of such engagement though this is either delegated or only</i></p>

<sup>1</sup> This question is examining a Chief Executive Officer/Chair of the Board’s commitment in their official capacity as a senior leader of the company.

<sup>2</sup> This question is not referring to written statements.

	<p><i>occasional (i.e. only once in the last two years).</i></p> <p><i>0: There is little to no engagement apparent.</i></p>
A3	<p><b>Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?</b><sup>34</sup></p> <p>Guidance Notes: The assessor is looking for evidence of personal commitment of the company’s leadership to ensuring its ethics and anti-corruption agenda is actively promoted throughout the company. Examples may include speaking at training events or other employee gatherings, or chairing a review of anti-corruption programmes.</p> <p>Scoring Criteria:</p> <p><i>2: The CEO shows a personal engagement with management and staff in promoting the ethics and anti-corruption agenda within the company. There has been at least three examples of this over the last two years.</i></p> <p><i>1: The CEO shows a personal engagement with management and staff in promoting the ethics and anti-corruption agenda within the company. However, there has been only one or two examples of this over the last two years.</i></p> <p><i>0: There is little to no engagement apparent.</i></p>
A4	<p><b>Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?</b></p> <p>Guidance Notes: The assessor is looking for evidence of the company’s commitment to high standards of business conduct through the publication of a clear statement of such values, beyond that of compliance-based legal statements.</p> <p>Scoring Criteria:</p> <p><i>2: The company publishes a statement of values representing high business standards and demonstrates that these are translated into company policies and codes.</i></p> <p><i>1: The company publishes such a statement, but it does not go into sufficient depth by explaining what they mean by such values and why they matter to the organisation.</i></p> <p><i>0: No such statement has been found, or the company frames it using legal jargon for the purpose of compliance.</i></p>
External Engagement	
A5	<p><b>Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?</b></p> <p>Guidance Notes: The assessor is looking for evidence of membership of national and international</p>

<sup>3</sup> This question is examining a Chief Executive Officer/Chair of the Board’s commitment in their official capacity as a senior leader of the company.

<sup>4</sup> This question is not referring to written statements.

	<p>initiatives, examples of which include: Defense Industry Initiative (DII), International Forum on Business Ethical Conduct (IFBEC), World Economic Forum Partnering Against Corruption (PACI), International Chamber of Commerce Anti-Corruption Commission, ASD Common Industry Standards (CIS), UN Global Compact, membership of the national Transparency International Chapter, etc.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company is a member of a national or international initiative(s) that clearly promotes anti-corruption.</i></p> <p><i>1: There is evidence of intention to join a national or international initiative(s) that clearly promotes anti-corruption, OR there is membership of a national or international initiative(s) but its focus on anti-corruption is unclear.</i></p> <p><i>0: There is no evidence of membership of an anti-corruption or business ethics initiative.</i></p>
<p>Structure and Organisation</p>	
<p>A6</p>	<p><b>Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that the Board holds direct responsibility for the ethics and anti-corruption agenda. This should include clear terms of reference on what this responsibility entails.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has appointed a Board committee with overall corporate responsibility for its ethics and anti-corruption agenda. In some companies, the main Board or an individual Board member may have been nominated to this role. This committee or individual has clear terms of reference detailing what this responsibility entails.</i></p> <p><i>1: The company has appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda, but there is no evidence of clear terms of reference on what this responsibility entails.</i></p> <p><i>0: There is no evidence that the company has appointed such a Board committee or individual member to this role.</i></p>
<p>A7</p>	<p><b>Has the company appointed a person at a senior level within the company to have responsibility for implementing the company's ethics and anti-corruption agenda, and who has a direct reporting line to the Board?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence of a senior person taking responsibility for implementing the ethics and anti-corruption agenda, rather than this responsibility being delegated to lower management levels of the company.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: A Board or top executive committee has appointed a senior person to be responsible for implementing the ethics and compliance agenda and is identifiable by name.</i></p> <p><i>1: A Board or top executive committee has clearly been assigned with this role but no individual has been named.</i></p>

	<p><i>0: There is no evidence that the company has appointed such a senior individual member.</i></p>
Monitoring and Evaluation	
A8	<p><b>Is there regular Board level monitoring and review of the performance of the company's ethics and anti-corruption agenda?</b></p> <p>Guidance Notes: The assessor is looking for evidence of a formal senior review process which addresses the full ethics and anti-corruption agenda and its associated processes, including evidence that such reviews are scheduled to occur regularly, at least on an annual basis.</p> <p>Scoring Criteria:</p> <p><i>2: There is either a formal Board review of the entire ethics and anti-corruption agenda at least annually, or the company commissions an external review of the same. This may be by the responsible Board sub-committee, e.g. the Audit Committee or Ethics committee, but if so it has to be clearly specified as a major review rather than continuous monitoring.</i></p> <p><i>1: There is regular review of some aspects of the programme, for example the Code of Conduct, but not the whole ethics and anti-corruption agenda. Alternatively there is review by the Audit Committee, but the scope for the review is more of a continuous monitoring than a major periodic review. Alternatively still, there is a major review but this is less often than once per annum</i></p> <p><i>0: There is no evidence of a major review and only weak evidence of regular monitoring.</i></p>
A8(a)	<p><b>Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?</b></p> <p>Guidance Notes: The assessor is looking for evidence of a formal, clear, written plan in place to guide the Board or senior management review of the ethics and anti-corruption agenda, and evidence of implementation of improvement plans when weaknesses are identified. This could include monitoring indicators such as anti-corruption training uptake, group ethics and compliance activities, employee surveys, and helpline statistics and trends.</p> <p>Scoring Criteria:</p> <p><i>2: There is a formal, clear, written plan in place that guides Board or senior management review, and evidence that improvement plans—such as monitoring indicators—are put in place when issues are identified.</i></p> <p><i>1: There is limited evidence of a plan that guides Board or senior management review, and limited evidence of the implementation of improvement plans.</i></p> <p><i>0: There is no evidence of a regular review of the ethics and anti-corruption agenda.</i></p>
A9	<p><b>Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?</b></p> <p>Guidance Notes: The assessor is looking for evidence that the company has a formal process for the</p>

	<p>review and update of its ethics and anti-corruption agenda in the event of an actual or alleged instance of corruption. The assessor will look for any examples that can be provided of such review and its outcome.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has a formal process for review and update of company policies in the event of an actual or alleged instance of corruption. There is no evidence of examples indicating exceptions.</i></p> <p><i>1: The company undertakes such review and update but examples suggest there may be exceptions.</i></p> <p><i>0: There is no evidence of such review and update.</i></p>
<p><b>Pillar 2: Risk Management</b></p>	
<p>Risk Assessment</p>	
<p>A9(a)</p>	<p><b>Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that such a procedure exists and is documented, and that the company follows this procedure. A corruption risk assessment system could include determining the risks associated with internal procedures, different geographies, business areas, and transactions. The assessor is also looking for evidence the company uses these assessments to mitigate the risks, with clear ownership and timelines, and to improve the anti-corruption programme where appropriate.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has such a formal procedure, and develops mitigation plans to minimise the risk from these areas which involve clear ownership and timelines for implementation. The procedure is clearly applied enterprise-wide.</i></p> <p><i>1: The company has such a procedure but this falls short in some regard, with respect, for example, to uncertainty as to how it should be applied, who owns the mitigation plans, and when they must be applied.</i></p> <p><i>0: There is no evidence that the company has such a procedure, or the procedure is so weak as to be ineffective.</i></p>
<p>A10</p>	<p><b>Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that such a procedure exists and is documented, and that the company follows this procedure with respect to important business decisions: new acquisitions, new products, and moving into new markets, for example. Not all business decisions will require such an assessment, hence the need to specify the circumstances under which the procedure will be applied.</p> <p><i>Scoring Criteria:</i></p>

	<p><i>2: The company has such a formal procedure.</i></p> <p><i>1: The company has such a procedure but this falls short in some regard, with respect, for example, to uncertainty as to how it should be applied or to precisely which business decisions apply.</i></p> <p><i>0: There is no evidence that the company has such a procedure, or the procedure is so weak as to be ineffective.</i></p>
Partners and Agents	
A11	<p><b>Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?<sup>5</sup></b></p> <p>Guidance Notes: The assessor is looking for evidence that due diligence has been conducted on all its current agents and is conducted as a matter of policy on all new agents. The assessor will also look for evidence that the company has a policy to refresh the due diligence at least every 3 years, and when there is a significant change in the business relationship or the nature of the agency. “Agents” are the agents, advisors or other third party intermediaries authorised to act for or on behalf of the company to further its business interests.</p> <p>Scoring Criteria:</p> <p><i>2: The company has formal procedures in place, and refreshes the due diligence at least every 3 years and when there is a significant change in the business relationship.</i></p> <p><i>1: The company has formal procedures but there is no evidence that the company refreshes the due diligence at least every 3 years and / or when there is a significant change in the business relationship.</i></p> <p><i>0: There is no evidence of such a procedure or its provision is so weak as to be ineffective.</i></p>
A12	<p><b>Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?<sup>6</sup></b></p> <p>Guidance Notes: The assessor is looking for evidence that the company has insight into the agent’s activities with regard to the alignment of the intermediary’s ethics and anti-corruption agenda with that of its own programme and has in place the contractual rights and formal processes to prevent or deal with the occurrence of any violations, through correction or termination / disclosure to regulatory authorities.</p> <p>Scoring Criteria:</p> <p><i>2: The company has formal procedures and contractual rights in place, such as monitoring by the business unit, internal or external audit by an assessor independent of the relevant business unit, and termination of contract if corrupt activities are found.</i></p> <p><i>1: The company has formal procedures and contractual rights in place, but falls short in some way; for example there is no evidence of monitoring.</i></p>

<sup>5</sup> Companies can be scored a 2 if public evidence suggests that they do not use agents.

<sup>6</sup> Companies can be scored a 2 if public evidence suggests that they do not use agents.



	<p><i>0: There is no evidence of such a procedure or its provision is so weak as to be ineffective.</i></p>
A13	<p><b>Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?</b></p> <p>Guidance Notes: The assessor is looking for evidence that the company passes its ethics and anti-corruption standards down the supply chain and makes clear the consequences of any breaches in its policies on these matters. The assessor will look for any examples that can be provided as to where such a policy has been applied.</p> <p>Scoring Criteria:</p> <p><i>2: The company communicates its ethics and anti-corruption agenda down the supply chain, and makes clear its requirement for suppliers to conform to its anti-corruption policies. It ensures contractual rights to apply sanctions in the event of breach of its contract.</i></p> <p><i>1: The company makes clear its ethics and anti-corruption agendas but this falls short in some regard, for example the consequences of non-compliance are not made clear or there is no evidence of contractual rights or sanctions.</i></p> <p><i>0: There is no evidence that the company has or applies such policies or contractual terms.</i></p>
Offsets	
A13(a)	<p><b>Does the company explicitly address the corruption risks associated with offset contracting?<sup>78</sup></b></p> <p>Guidance Notes: The assessor is looking for evidence that the company has processes for addressing offset contract corruption risks, for example through policies, procedures and contractual terms that increase transparency and accountability in its offset programme. These measures might include incorporating offset contracting into normal business conduct requirements, business ethics practices and into training programmes. The assessor will also look for evidence such procedures are regularly updated.</p> <p>The term “offset contract” here refers to both direct offset and indirect offset arrangements or any other terms to indicate such arrangements (e.g. counter-trade agreements).</p> <p>If there is no evidence that the company enters into offset contracts, or if the company specifically states that it does not enter offset contracts, this question should be scored NA. If the company states that it does not enter offset contracts because it views them as bad practice in a way that links to corruption risk (that they are, for example, secretive, opaque, or overly complex), then this question should be scored 2.</p>

<sup>7</sup> If there is no evidence that a company conducts offsets and it is scored “NA” against questions A13(a) and A13(b), they are removed from the overall score total of the company’s assessment.

<sup>8</sup> The timing element of the scoring criteria is inapplicable as it is overly restrictive. As a result, for a company to score 2 on this question evidence must only show that offset contracting corruption risk is explicitly addressed in a company’s offset policies, procedures and contractual terms.

	<p><i>Scoring Criteria:</i></p> <p><i>2: Offset contracting corruption risk is explicitly addressed in the company’s offset policies, procedures and contractual terms. These policies and procedures are reviewed each time a contract is signed, or at least every 24 months.</i></p> <p><i>1: Offset contracting corruption risk is addressed at a general level, but there is little evidence of detailed policies and processes.</i></p> <p><i>0: There is no evidence of offset contracting risk being addressed.</i></p>
A13(b)	<p><b>Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?<sup>9</sup></b></p> <p><i>Guidance Notes:</i></p> <p>Here “partners” refers both to the customer with whom the offset contract is negotiated and any business partnerships formed in pursuance of the offset contract. “Brokers” refers to agents/intermediaries contracted to arrange offset contracts on the company’s behalf.</p> <p>The assessor is looking for evidence that due diligence has been conducted on all its current offsets partners / brokers, and is conducted as a matter of policy on all new offsets partners / brokers. The assessor will also look for evidence that the company has a policy to refresh the due diligence at least every 3 years, or earlier when there is a significant change in the business relationship or nature of the partner.</p> <p>If there is no evidence that the company enters into offset contracts, or if the company specifically states that it does not enter offset contracts, this question should be scored NA. If the company states that it does not enter offset contracts because it views them as bad practice in a way that links to corruption risk (that they are, for example, secretive, opaque, or overly complex), then this question should be scored 2.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has formal procedures in place, and refreshes the due diligence at least every 3 years or earlier when there is a significant change in the business relationship or nature of the partner.</i></p> <p><i>1: The company has formal procedures in place, but there is no evidence that the company refreshes the due diligence at least every 3 years or when there is a significant change in the business relationship or nature of the partner.</i></p> <p><i>0: There is no evidence of such a procedure or its provision is so weak as to be ineffective.</i></p>
<p><b>Pillar 3: Company Policies and Codes</b></p>	
<p>Policies</p>	
A15	<p><b>Does the company have an anti-corruption policy that prohibits corruption in its various forms?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that the company has a comprehensive anti-corruption policy. This includes the prohibition of both the giving and receiving of bribes.</p>

<sup>9</sup> If there is no evidence that a company conducts offsets and it is scored “NA” against questions A13(a) and A13(b), they are removed from the overall score total of the company’s assessment.



	<p>Additionally, the policy should identify corruption in its various forms, such as kickbacks and undue influence as well as bribes.</p> <p>It is noted and accepted that the anti-corruption policy may be situated within a wider company policy or exist as a separate set of policies.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has a policy that prohibits the giving and receiving of bribes, and is explicit on the various forms corruptions can take.</i></p> <p><i>1: The company has a policy on corruption but is either not a clear statement, is not explicit on all the forms that such corruption might take, or only covers the giving or receiving of bribes – but not both.</i></p> <p><i>0: There is no evidence that the company has an anti-corruption policy, or it is so vague as to be ineffective.</i></p>
A16	<p><b>Is the anti-corruption policy explicitly one of zero tolerance?</b></p> <p><i>Guidance Notes:</i></p> <p>The company has an explicit statement contained within its policies that it has a zero tolerance policy of corruption or bribery. This does not include signing up to external organisations such as the Common Industry Standards that may have similar language.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has an explicit policy of a zero tolerance policy statement of corruption or bribery specifically.</i></p> <p><i>1: The company has a policy of zero tolerance policy of violations of a Code of Ethics or similar, but not of corruption or bribery specifically.</i></p> <p><i>0: There is no evidence that the company has a zero tolerance policy against corruption.</i></p>
A17	<p><b>Is the company's anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?<sup>10</sup></b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence of easy availability to any person requiring access. This could include translated into multiple languages (at least the main geographies that the company operates in) and publication of the policy in an intranet or publicly available site.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company's policy is easily available for all employees, contracted staff, and affiliated organisations.</i></p> <p><i>1: The company's policy is not easily available in some way—available in limited languages, or not accessible to contracted staff, for example.</i></p> <p><i>0: There is no evidence that the company has an anti-corruption policy.</i></p>

<sup>10</sup> As well as a company's anti-corruption policy, other documents from a company's ethics and anti-corruption agenda are applicable, such as a code of conduct.

A17(a)	<p><b>Is the company's anti-corruption policy easily understandable and clear to Board members, employees and third parties?<sup>11</sup></b></p> <p>Guidance Notes: The assessor is looking for evidence that the anti-corruption policy is written in clear, understandable terms for all audiences and not couched in dense, legal terms. The policy should be easily understood by a new employee or third party who has not worked in the sector before, and is unfamiliar with the corruption risks. Note that whereas this question refers to ease of <i>understanding</i>, the previous question, A17, refers to ease of <i>access</i>.</p> <p>Scoring Criteria:</p> <p><i>2: The policy is written in accessible, comprehensible language.</i></p> <p><i>1: The company's policy is not easily understandable to employees and third parties; for example, it is not easily understood by a non-legal audience.</i></p> <p><i>0: There is no evidence that the company has an anti-corruption policy.</i></p>
A18	<p><b>Does the anti-corruption policy explicitly apply to all employees and members of the Board?<sup>12</sup></b></p> <p>Guidance Notes: -</p> <p>Scoring Criteria:</p> <p><i>2: The policy applies to all employees and members of the Board.</i></p> <p><i>1: The policy applies to all employees, though it is not clear if this includes members of the Board.</i></p> <p><i>0: There is no evidence that the policy applies to all employees.</i></p>
A20	<p><b>Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?</b></p> <p>Guidance Notes: A conflict of interest may be the underlying cause of, or might lead to, corrupt behaviours. The assessor is looking for evidence of a clearly worded policy on potential conflicts of interest, including a definition of conflict of interest and where such a policy might apply (ideally illustrated by examples).</p> <p>Scoring Criteria:</p> <p><i>2: The company has a policy for and examples of potential conflicts of interest.</i></p> <p><i>1: The company has a policy, but it falls short in some way, such as vague wording or not clearly defining a conflict of interest.</i></p> <p><i>0: There is no evidence that the company has or applies such policies.</i></p>

<sup>11</sup> Ibid

<sup>12</sup> Ibid

Gifts and Hospitality	
A21	<p><b>Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?</b></p> <hr/> <p>Guidance Notes:</p> <p>The assessor is looking for evidence that the giving and receipt of gifts is controlled so as to ensure that such transactions are not corrupt and comply with laws such as the UK Bribery Act and its provisions for FPOs. This might be through setting clear upper limits on the acceptable value of a gift, stating the nature of a gift that cannot be given or received under any circumstances (e.g. cash) and / or the requirement for senior management authorisation if a value threshold is exceeded.</p> <hr/> <p>Scoring Criteria:</p> <p><i>2: There is such a policy and the company either sets upper limits for gift exchange or senior authorisation, or publicly declares all gifts so that they can be publicly audited.</i></p> <p><i>1: There is such a policy but it does not set clear upper limits or a specific threshold necessary for senior authorisation.</i></p> <p><i>0: There is no evidence of such a policy.</i></p>
A22	<p><b>Does the company's anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?</b></p> <hr/> <p>Guidance Notes:</p> <p>The assessor is looking for evidence that the giving and receipt of hospitality is controlled so as to ensure that such transactions are not corrupt and comply with laws such as the UK Bribery Act. This might be through setting clear upper limits on the acceptable value of hospitality, stating the nature of hospitality that cannot be given or received under any circumstances (e.g. night clubs) and / or the requirement for senior management authorisation if a value threshold is exceeded plus documentation of hospitality given or received.</p> <hr/> <p>Scoring Criteria:</p> <p><i>2: There is such a policy and the company either sets upper limits for hospitality exchange or senior authorisation, or publicly declares all hospitality so that it can be publicly audited.</i></p> <p><i>1: There is such a policy but it does not set clear upper limits or a specific threshold necessary for senior authorisation.</i></p> <p><i>0: There is no such evidence of such a policy.</i></p>
Facilitation Payments	
A23	<p><b>Does the company have a policy that explicitly prohibits facilitation payments?</b></p> <hr/> <p>Guidance Notes:</p> <p>The assessor is looking for evidence that the policy is clear and prohibits facilitation payments excepting where there they are made to protect against a threat of loss of life, limb or liberty (that is, personal danger), and that any such facilitation payments are declared and recorded.</p> <hr/> <p>Scoring Criteria:</p>

*2: The policy is clear and prohibits facilitation payments. The policy may allow for payments to protect against duress where there is a threat of loss, life, limb, or liberty, and requires that any such payments are declared and recorded. The company provides guidance or supplementary information on how the policy is to be implemented in practice.*

*1: The policy is clear and prohibits facilitation payments. The policy may allow for payments to protect against duress where there is a threat of loss, life, limb, or liberty, and requires that any such payments are declared and recorded. However, the company provides no guidance or supplementary information on how the policy is to be implemented in practice.*

*0: No policy regulating facilitation payments exists.*

Political Contributions

A24

**Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?**

Guidance Notes:

The assessor is looking for evidence that the company recognises the corruption risk posed by political contributions, and has a policy that sufficiently regulates such transactions so as to ensure that they are not corrupt. This might be through prohibiting the company from giving political contributions, or, when the company does give donations, authorization is required from individuals with legal expertise in the company with the explicit purpose of preventing undue influence or other corrupt intent. Recipients should be declared and guidelines on the application of the regulations should be clear. It is not sufficient to state that the company complies with relevant laws and regulations.

Scoring Criteria:

*2: The company prohibits or regulates such contributions to prevent corruption or other undue influence. As part of this, recipients are publicly declared and guidelines on the application of the regulations are clear.*

*1: The company prohibits or regulates such contributions to prevent corruption or other undue influence. However, recipients are not publicly declared and/or guidelines on the application of the regulations are not provided or are not clear.*

*0: There is no evidence that such contributions are prohibited or effectively regulated.*

A25

**Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?**

Guidance Notes:

The assessor is looking for evidence that the company recognises the corruption risk posed by lobbying activities, and has a policy that sufficiently regulates such activity so as to ensure that it is not corrupt. This might be through prohibiting the company from engaging in lobbying activities, or, when the company does engage in lobbying, authorization is required from individuals with legal expertise in the company with the explicit purpose of preventing undue influence or other corrupt intent. Guidelines on the application of the policy should be clear. It is not sufficient to merely state that the company complies with relevant laws and regulations.

	<p><i>Scoring Criteria:</i></p> <p><i>2: A policy exists that clearly regulates lobbying activity to prevent undue influence or other corrupt intent, and guidelines on its application are clear.</i></p> <p><i>1: A policy exists that clearly regulates lobbying activity to prevent undue influence or other corrupt intent, although guidelines on its applications are not provided or are not clear.</i></p> <p><i>0: No such policy exists.</i></p>
A25(a)	<p><b>Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?<sup>13</sup></b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that the company recognises the corruption risk that can be posed by charitable contributions, and has a policy that sufficiently regulates such transactions so as to ensure that they are not corrupt. This should include internal controls such as criteria for donations and procedures for approval including counter signatures, checks and balances, and due diligence on potential recipients. Recipients should be declared and the outcomes of donations monitored.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company prohibits or regulates such contributions to prevent corruption or other undue influence. As part of this, procedures for donations are clear and recipients are publicly declared.</i></p> <p><i>1: There is no evidence of a procedure to control charitable contributions. Recipients are not publicly declared.</i></p> <p><i>0: There is no evidence that such contributions are prohibited or effectively regulated.</i></p>
<b>Pillar 4: Training</b>	
<b>General Training</b>	
A26	<p><b>Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that the ethics and compliance agenda is fully explained to employees through the use of written guidance. This would be expected to contain examples to illustrate particular situations, for example in the form of scenarios or case studies. The guidance should ensure an unambiguous understanding of the policies in place, with any areas of uncertainty in meaning or application fully explained.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: Employees have access to such written guidance that is both unambiguous and suitably illustrated.</i></p> <p><i>1: Employees have access to written guidance but this falls short in some regard, for example a lack of scenarios or illustration.</i></p>

<sup>13</sup> Sponsorships are not considered charitable contributions.

	<i>0: There is no evidence of such written guidance.</i>
A27	<p><b>Does the company have a training programme that explicitly covers anti-corruption?</b></p> <p>Guidance Notes: Anti-corruption training that is focused, and grounded by assessment of where corruption risk is highest, is a crucial part of a company’s efforts to promote integrity. Yet often, anti-corruption training is contained within a larger corporate compliance or Code of Ethics training programme. The assessor is looking for evidence that anti-corruption training is either explicitly provided as a separate training programme or is a module that is part of the company’s larger ethics training programme.</p> <p>Scoring Criteria:</p> <p><i>2: The company has an explicit anti-corruption module as part of its ethics and compliance training programme.</i></p> <p><i>1: The company has a training programme on its ethics and compliance systems (which include an anti-corruption policy) but it is not clear if there is a specific anti-corruption training module.</i></p> <p><i>0: There is no evidence such training exists.</i></p>
A28	<p><b>Is anti-corruption training provided in all countries where the company operates or has company sites?</b></p> <p>Guidance Notes: -</p> <p>Scoring Criteria:</p> <p><i>2: Training is provided in all countries where the company operates or has company sites.</i></p> <p><i>1: Training is provided in the principal countries where the company operates or has company sites.</i></p> <p><i>0: Training is poorly represented across the countries where the company operates or has company sites.</i></p>
<b>Specialist Training</b>	
A29	<p><b>Does the company provide targeted anti-corruption training to members of the Board?</b></p> <p>Guidance Notes: Board members a) have particular governance responsibilities for ethics and compliance and b) may need to know specific aspects of anti-corruption related to their Board roles, e.g. member of the Audit Committee. The assessor is looking for evidence that the company recognises this and provides appropriate anti-corruption training to Board members who are re-trained at least every 3 years.</p> <p>Scoring Criteria:</p> <p><i>2: The company provides targeted anti-corruption training to members of the Board, who are re-trained at least every 3 years.</i></p> <p><i>1: The company provides targeted anti-corruption training to members of the Board, but they are not re-trained at least every 3 years.</i></p>



	<i>0: There is no evidence of such training.</i>
A30	<p><b>Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?</b></p> <p>Guidance Notes: The assessor is looking for evidence that the company has assessed the training needs of employees in sensitive positions and provides tailored ethics and anti-corruption training. Sensitive positions are those that will expose an employee to potentially corrupt situations at a greater frequency than other staff and / or to more specific forms of corruption. Functions that have high risk can include marketing, government relations, contracting, in-country project management, sales, etc.</p> <p>Scoring Criteria:</p> <p><i>2: The company tailors its ethics and anti-corruption training programme for employees facing different levels of risk.</i></p> <p><i>1: The company has a varied ethics and anti-corruption training programme but this is either not comprehensive or not targeted at all high risk positions.</i></p> <p><i>0: There is no evidence of such training being delivered.</i></p>
<b>Pillar 5: Personnel and Helplines</b>	
Personnel and Discipline	
A31	<p><b>Does the company have a clear and formal process by which employees declare conflicts of interest?</b></p> <p>Guidance Notes: The assessor is looking for evidence of a formal process. The conflict should be declared to an independent department such as Legal, HR or a specific Conflict of Interest office. If conflicts are reported only to managers, the declaration should be formal and in writing. A policy to talk to the employee's manager but no evidence of how the conflict is recorded and resolved is not sufficient.</p> <p>Scoring Criteria:</p> <p><i>2: The company has a clear and formal process for employees to declare conflicts of interest, which involves conflicts being reported to an independent department.</i></p> <p><i>1: The company has a clear and formal process for employees to declare conflicts of interest, but this is to managers, albeit formally and in writing.</i></p> <p><i>0: No effective process exists or employees are only directed to inform their managers verbally of any potential conflicts.</i></p>
A32	<p><b>Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?</b></p> <p>Guidance Notes: The assessor is looking for evidence that the company has an explicit policy that states it will apply disciplinary procedures to employees, Directors and Board members that may have engaged in corruption activities. Since the anti-corruption policy could be housed within a wider Code of Ethics, the company could state that employees found to violate</p>

	<p>this code will face disciplinary procedures.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company clearly states that it will apply disciplinary procedures to employees who have violated its anti-corruption policy.</i></p> <p><i>1: The company may have a policy to apply disciplinary procedures to violations of a broader Code of Ethics or equivalent, but it is not explicitly stated that corruption cases fall under this policy.</i></p> <p><i>0: There is no such explicit commitment.</i></p>
<p>Helplines and Whistleblowers</p>	
A33	<p><b>Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that the company provides multiple different channels for employees to report instances of suspected corrupt activity, and clear and appropriate reporting lines. This includes both internal and external, independent channels. Additionally, a good approach to reporting channels also allows for some anonymous outlets, perhaps online or through a hotline, including the ability for two-way confidential or anonymous communication between the whistleblower and the company. Reporting to a General Counsel or line manager is often not effective as employees may not feel comfortable speaking up to these individuals.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: The company has multiple internal and independent channels to report instances of suspected corrupt activity that are well publicised and allow for anonymity.</i></p> <p><i>1: The company has some channels to report but falls short in some way by, for example, not publicising these channels well, or having no independent sources to report to, or not allowing for anonymity.</i></p> <p><i>0: The company provides no such channels, or only limited channels of reporting to the General Counsel or line manager.</i></p>
A33(a)	<p><b>Are the whistleblowing channels available to all employees in all geographies?</b></p> <p><i>Guidance Notes:</i></p> <p>The assessor is looking for evidence that employees from all geographies have access to multiple channels to report corruption.</p> <p><i>Scoring Criteria:</i></p> <p><i>2: Across geographies, all employees have access to more than one reporting channel.</i></p> <p><i>1: Across geographies, all employees have access to at least one reporting channel, but for some employees, it is only this one channel.</i></p> <p><i>0: Across geographies, some employees do not have access to any reporting channels.</i></p>

A33(b)	<p><b>Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?</b></p> <hr/> <p>Guidance Notes:</p> <p>A whistleblower is defined here as an employee who reports misconduct in a company internally or externally, before, during, or after the event. The assessor is looking for evidence of mechanisms that reduce or eliminate the fear to report concerns, through serious, visible, credible efforts to ensure that employees are comfortable doing so. This may include monitoring of whistleblowing channel usage statistics, independent employee surveys, and follow up with the whistleblower after serious incidents have been reported and investigated.</p> <hr/> <p>Scoring Criteria:</p> <p><i>2: There is evidence of a range of practices to ensure whistleblowing is encouraged and not penalised.</i></p> <p><i>1: There is evidence of some efforts to ensure whistleblowing is not deterred, but there is little evidence of detailed analysis of whistleblowing data or independent employee surveys.</i></p> <p><i>0: There is no evidence of efforts to ensure that whistleblowing is not deterred, or there has been evidence of employees being treated unsympathetically after blowing the whistle.</i></p>
A34	<p><b>Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?</b></p> <hr/> <p>Guidance Notes:</p> <p>The assessor is looking for evidence of such resources, for example in the form of trained managers, trained ethics officers, telephone helplines, an external ombudsman (subject to attorney-client privilege), etc.</p> <hr/> <p>Scoring Criteria:</p> <p><i>2: Employees have access to resources such as trained managers, advisers, helplines, or an external ombudsman (subject to attorney-client privilege), to provide them with guidance on the anti-corruption policy.</i></p> <p><i>1: Employees have access to resources but these resources are very limited in nature, e.g. a policy to talk to one's supervisor but no evidence that he or she is trained for the advisory job.</i></p> <p><i>0: There is no evidence of such resources.</i></p>
A35	<p><b>Is there a commitment to non-retaliation for bona fide reporting of corruption?<sup>14</sup></b></p> <hr/> <p>Guidance Notes:</p> <p>The assessor is looking for evidence that commitment to non-retaliation for bona fide reporting of corruption is clearly stated and that employees who breach this commitment will be disciplined.</p>

<sup>14</sup> To score a 2 the company must make a specific statement that disciplinary measures are applied to those breaching the non-retaliation policy.

*Scoring Criteria:*

*2: The company has a clear, legally enforceable, non-retaliation policy for bona fide reporting of corruption, and there is evidence that disciplinary measures are applied to employees who breach this policy.*

*1: The company has a clear, legally enforceable, non-retaliation policy for bona fide reporting of corruption, but there is no evidence that disciplinary measures are applied to employees who breach this policy.*

*0: No such policy exists.*