

Where does your company stand on countering bribery?

COMMITMENT		Yes	No	Partly	Planned
1	Does your company have a published policy of prohibition of bribery in any form whether direct or indirect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	Has your company committed to implementing a Programme to counter bribery?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	Is your Programme consistent with all laws relevant to countering bribery in each of the jurisdictions in which you operate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IMPLEMENTATION					
4	Is your Programme designed and improved on the basis of continuing risk assessment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	Does your Programme provide detailed policies and procedures to address the following:	Conflicts of interest	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Bribes in any form?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Political contributions?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Charitable donations and sponsorships?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Prohibition of facilitation payments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Gifts, hospitality and travel expenses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	Does your Board of Directors demonstrate visible and active commitment to the implementation of the anti-bribery Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7	Is your CEO responsible for ensuring that the Programme is implemented consistently with clear lines of authority?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	Does your Programme cover business relationships as follows:	The Programme is implemented in all business entities over which your company has effective control?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Does your company undertake properly documented, reasonable and proportionate anti-bribery due diligence on business entities when entering into a relationship?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	Do your human resources practices reflect your company's commitment to the Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11	Is the Programme communicated to:	All Directors, managers and employees?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Business associates?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Other stakeholders?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13	Is tailored training provided to:	All Directors, managers, employees and agents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Where appropriate, contractors and suppliers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
MONITORING AND REVIEW					
15	Are the internal control systems, in particular the accounting and record keeping practices, subjected to regular review and audit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16	Does your company perform reasonable and proportionate monitoring of its significant business relationships?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17	Does your company have feedback mechanisms and other internal processes supporting the continuous improvement of the Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Periodic reporting by management of the results of reviews to the Audit Committee or the Board with implementation of improvements as appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		An independent assessment by the Board of the adequacy of the Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19	Where appropriate, does your company undergo voluntary independent assurance of the Programme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PUBLIC REPORTING					
20	Does your company publicly disclose information about:	The Programme including the management systems employed to ensure its implementation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Material holdings of subsidiaries, affiliates, joint ventures and other related entities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		Payments to governments on a country-by-country basis?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>