Transparency International Sweden

Business Integrity Forum (BIF) | Investors Integrity Forum (IIF)

Anti-Bribery Checklist*: aligned to Transparency International's Business Principles for Countering Bribery*

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:*	☐	☐	☐	☐

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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: