

4. ANTI BRIBERY & CORRUPTION

No #	Question	2020 Answer
25	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	YES
26	Does the Entity have an enterprise wide programme that sets minimum ABC standards?	YES
27	Has the Entity appointed a designated officer or officers with sufficient experience/expertise responsible for coordinating the ABC programme?	YES
28	Does the Entity have adequate staff with appropriate levels of experience/expertise to implement the ABC programme?	YES
29	Is the Entity's ABC programme applicable to:	Not Applicable
30	Does the Entity have a global ABC policy that:	
30a	Prohibits the giving and receiving of bribes? This includes promising, offering, giving, solicitation or receiving of anything of value, directly or indirectly, if improperly intended to influence action or obtain an advantage	YES
30b	Includes enhanced requirements regarding interaction with public officials?	YES
30c	Includes a prohibition against the falsification of books and records (this may be within the ABC policy or any other policy applicable to the Legal Entity)?	YES
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	YES
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	YES
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	YES
33a	If Y select the frequency	12 MONTHS

34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	YES
35	Does the Entity's ABC EWRA cover the inherent risk components detailed below:	
35a	Potential liability created by intermediaries and other third-party providers as appropriate	YES
35b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	YES
35c	Transactions, products or services, including those that involve state-owned or statecontrolled entities or public officials	YES
35d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	YES
35e	Changes in business activities that may materially increase the Entity's corruption risk	YES
36	Does the Entity's internal audit function or other ,independent third party cover ABC Policies and Procedures?	YES
37	Does the Entity provide mandatory ABC training to:	
37a	Board and senior Committee Management	YES
37b	1st Line of Defence	YES
37c	2nd Line of Defence	YES
37d	3rd Line of Defence	YES
37e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	Not Applicable
37f	Non-employed workers as appropriate (contractors/consultants)	NO
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	YES

39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	YES
39a	If N, clarify which questions the difference/s relate to and the branch/es that this applies to.	
39b	If appropriate, provide any additional information / context to the answers in this section.	CACIB internet page "Fight Against Corruption"