

SIMPLIFIED CIPE SELF-EVALUATION TOOL (SET)

	Anti-Bribery Principles	Yes	No	Partly	Planned
1	Does your company have written policy of zero tolerance of bribery?				
2	Does the policy prohibit bribery in all its forms?				
2a	Does the policy cover rules on political contributions?				
2b	Does the policy cover rules on charitable donations?				
2c	Does the policy cover rules on gifts, hospitality and travel expenses?				
3	Has the policy been formally approved by the board of directors (or highest governing body) of your company?				
4	Does your company have a code of conduct which includes an explicit statement of the no-bribes policy?				
5	Has your company made a public commitment to anti-bribery (e.g. on its website or annual report)?				

	Anti-Bribery Program	Yes	No	Partly	Planned
6	Does your company have a formal program to implement its policy of zero-tolerance of bribers?				
7	Has the program been formally approved by the board (or highest governing body) of your company?				
8	Is the program documented (with a system of document control for the key policies and procedures)?				
9	Is there a person (compliance officer) or a team assigned to manage the program?				
10	Does the board (or highest governing body) provide oversight to the program, either directly or through a board committee?				
11	Does your company carry out regular risk assessment to determine the risk of bribery and tailor the program to mitigate these risks?				
11a	Are sales and marketing procedures reviewed regularly where risks of bribery apply in order to implement appropriate remedies?				
11b	Are contracting and purchasing procedures reviewed regularly where risks of bribery apply in order to implement appropriate remedies?				
12	Is the program implemented in all business entities over which your business has effective control?				
13	Is the program communicated to all employees, including sanctions for violations?				
14	Is the program communicated to third parties (business partners) who are involved in the business?				
15	Do your company's human resources practices in recruitment, promotion, training, performance evaluation, and recognition				

	reflect the company's commitment to the program?				
15a	Is tailored anti-bribery training provided to all directors, managers, and employees?				
15b	Is tailored anti-bribery training provided to key all high risk third parties including intermediaries, contractors, and suppliers?				
16	Does your company provide secure and accessible channels through which employees and others can obtain advice, raise concerns, and report violation (whistleblowing) without fear of reprisal?				
17	Is it the company's policy that no employee will suffer demotion, penalty or other adverse consequences for refusing to pay bribers even if such refusal may result in the company losing business?				

	Internal Controls, Monitoring and Review of the Program	Yes	No	Partly	Planned
18	Does the company have internal controls that include financial and organizational checks and balances over the company's accounting and record keeping practices?				
19	Are there procedures to maintain available for inspection accurate books and records that properly document all financial transactions?				
20	Is there a procedure to ensure that the internal control system, in particular the accounting and record-keeping practices, are subject to regular internal audits to provide assurance that they are effective in countering bribery?				
21	Is there a board Audit Committee that provides oversight of internal controls, financial reporting processes and related functions including countering bribery?				
22	Does the Audit Committee, board or equivalent body make a regular and independent assessment of the adequacy of the program to recommend improvements?				
23	Does the person managing the program (compliance officer) have direct access to the board or Audit Committee for prompt reporting of serious issues or concerns?				