

ANTI-CORRUPTION: COMPANY CULTURE AND PROCEDURES							
Question	Signalling a non-corrupt environment	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
AC.1	Does the company take a clear stand against corruption?	x					
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company's CEO, director or president has declared that the company will not engage in corruption at any time or in any form.	x					
b	The company has a policy rejecting corruption and requiring all directors, managers and workers worldwide to behave ethically and in conformity with the law.	x					
c	The company anti-corruption policy includes how to handle requests for facilitation payments, giving and receiving gifts, engaging in sponsorships, giving political contributions, and how to conduct responsible lobbying.	x					
d	The company has defined benchmarks and indicators regarding its anti-corruption initiatives and reports these to the public (e.g. in its annual CSR report)	x					
e	The company has defined benchmarks and indicators regarding its anti-corruption initiatives and reports these to the public (e.g. in its annual CSR report)	x				This is the same question as (d)	
Question	Anti-Corruption risk assessment	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
AC.2	Does the company assess the risk of corruption when doing business?	x					
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company evaluates the potential areas of corruption including factors such as type of transaction, countries of operation, industries, and customers or business partners involved.	x					
b	The company evaluates the risk of corruption when workers, agents, intermediaries or consultants deal with public officials (including workers of state owned companies).	x					
c	The company evaluates the risk of internal and external conflicts of interest in relation to business partners.	x					
d	The company has developed an action plan to address the risk of corruption, and has defined responsibilities for each task, as a minimum for high-risk areas.	x					
e	The company has identified internal functions with the highest risk of corruption within the company and seeks to address these weaknesses.	x					
Question	Awareness raising	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
AC.3	Does the company ensure that relevant workers are properly trained?	x					
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company informs all workers about its anti-corruption commitment.	x					
b	The company provides regular anti-corruption training for all relevant workers within the organisation e.g. procurement and sales staff.	x					
c	Information on disciplinary procedures for violations of company anti-corruption policies is available to workers.	x					
d	The company actively seeks worker feedback and dialogue on its anti-corruption initiatives.	x					
e	The company has and promotes a function by which workers can safely report suspicion of corruption related cases (e.g. hotline or mailbox) and allocates resources to systematically address the issues that are identified.	x					
Question	Anti-corruption procedures	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
AC.4	Do the company's internal procedures support its anti-corruption commitment?	x					

Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company has assigned different individuals or departments to be responsible for handling contracts, placing orders, receiving goods, processing invoices and making payments.	x					
b	The company mentions "anti-corruption" and/or "ethical behaviour" in its contracts with business partners.	x					
c	The company prohibits informal employment and any 'off the books' record-keeping	x					
d	The company performs internal audits and has checks in place in connection with all anti-corruption commitments.	x					
e	The company's procurement, financial and internal audit personnel have clear instructions to look for and to identify alarms, report them to management, and follow-up counter measures.	x					
f	The company requests external auditors to maintain a critical eye and follow all alarms and irregularities.	x					
g	Any alarm or irregularity reported by external auditors is systematically addressed by management.	x					
h	The company monitors compliance and continuously identifies strengths and weaknesses in the anti-corruption initiatives to remain effective and up-to-date in addressing changing risks.	x					
Question	Agents and other associates	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
<b>AC.5</b>	<b>Does the company's anti-corruption initiative cover agents, intermediaries and consultants?</b>	x					
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company conducts an inquiry and/or attentiveness (e.g. financial, legal, labour, tax, IT, environment, market/commercial) on all agents, intermediaries and consultants.	x				When required	
b	All agreements with agents, intermediaries and consultants are fully documented in written, signed contracts.	x					
c	The selection and terms of reference of agents, intermediaries or consultants are approved at the senior management level or at a level above that of the management involved in the operations for which the intermediary is hired.	x					
d	Contracts with agents, intermediaries and consultants include a section on anti-corruption and that the contract-holder must comply with all applicable laws and regulations.	x					
e	Agents, intermediaries and consultants are provided with information on the company's anti-corruption commitment, anti-corruption policies, training material on anti-corrupt behaviour and information on disciplinary procedures for violations of company anti-corruption policies.	x					
f	The company ensures that payment to agents, intermediaries and consultants are in line with standard payments for other service providers of similar ranking.	x					
g	The company only makes payments by bank transfer or check - never in cash - in the country of the agent, intermediary and consultant and never to a third party without prior examination.	x					
<b>ANTI-CORRUPTION: JOINT ACTIONS</b>							
Question	JOINT ACTIONS	YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
<b>AC.6</b>	<b>Does the company take joint actions with others to engage in and promote anti-corruption initiatives?</b>	x					
Indicators		YES	NO	F/A	N/A	COMMENTS	FOLLOW-UP ACTION
a	The company shares experience, procedures and challenges of corruption with other organizations i.e. the local business community, sector initiatives, networks etc.	x					
b	The company has initiated or joined initiatives with other companies in the same sector for the purpose of promoting a fair business environment.				x		
c	The company stimulates multi-stakeholder dialogue on challenges of corruption.	x					

d	The company encourages the local business community and business partners to initiate cooperation to fight corruption.	x				Where relevant	
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