

IFBEC Public Accountability Questionnaire

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The responses to these questions will be used for aggregated non-Company specific reporting. Responses to this prototype survey will be made anonymously via an on-line survey instrument.

If any answer requires clarification, a text box is available to explain the answer. However, this text box does not require a response

IFBEC Public Accountability Questionnaire

Section 1 – Company Demographics

1. What is the company's revenue/turnover for the most recently completed fiscal year?

a. (amount)

b. (currency)

2. How many employees does the company have?

3. Number of employees dedicated to ethics/compliance

a. Full
time

b. Part
time

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Section 2 – Company Policy and Governance

1. Does the company have a written integrity/ethics & business conduct policy, or code of ethics?

- Yes
 No

Explain

2. Do any integrity policy or code provisions or other written policies address anti-corruption compliance risk?

- Yes
 No

Explain

3. Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the anti-corruption principles of the company?

- Yes
 No

Explain

4. What is the title of the senior person(s) assigned responsibility for the Company's ethics and business conduct program [OR anti-corruption program]?

4a. To whom does this individual report?

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4b. Does this individual have direct access to the Board or a committee of the Board?

Yes

No

Explain

5. Does the integrity policy or code prohibit cash payments?

Yes

No

Explain

6. Is compliance with the company integrity policy or code considered when evaluating the performance of management and leadership?

Yes

No

Explain

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7. Is senior management or the board or a board committee made aware on a regular basis of corruption issues covering allegations made, actual corrupt activities detected and ongoing investigations of suspicious activities?

- Yes
- No

Explain

8. Does the company have a written policy on the giving and receipt of gifts and hospitality?

- Yes
- No

Explain

9a. Does the company have a written policy on political contributions?

- Yes
- No

Explain

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9b. Does the company have a written policy on charitable donations?

Yes

No

Explain

10. Does the company have a clear policy prohibiting facilitation payments or require the recording of payments if they are made?

Yes

No

Explain

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Section 3 - Communication and Training

11a. Do any integrity policy or code provisions or other written policies require that advisors (include agents, consultants, or intermediaries engaged to assist in developing, expanding or maintaining the Company's business) be made aware of the integrity policy or code of the Company and legal requirements as regard bribery?

Yes

No

Explain

11b. Do any integrity policy or code provisions or other written policies require that majority-owned joint venture entities be made aware of the integrity policy or code of the Company and legal requirements as regard bribery?

Yes

No

Explain

11c. Do any integrity policy or code provisions or other written policies require that subcontractors and suppliers be made aware of the integrity policy or code of the Company and legal requirements as regard bribery?

Yes

No

Explain

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12. Does the Company distribute the integrity policy or code to all employees?

- Yes
- No

Explain

12a. How is the integrity policy or code made available to employees? (Please select all that apply.)

- Hard Copy
- Intranet
- Other (Explain)

13. Are new employees trained on the integrity policy or code?

- Yes
- No

Explain

14. How often do existing employees receive training on the Company integrity policy or code?

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15. Do existing employees who are exposed to risks of corruption receive periodic training on anti-corruption?

- Yes
 No

Explain

16. Does the company use dedicated resources trained in anti-corruption and compliance issues for the vetting of advisors?

- Yes
 No

Explain

Section 4.1 Implementation and Monitoring: Reporting Violations

17. Does the integrity policy or code require prompt reporting of violations?

- Yes
- No

Explain

17a. If yes, what is the title of the individual to whom a report must be made? [ethics officer, human resources manager, legal counsel, other]

18. What internal mechanisms does the Company maintain for reporting violations of Code, misconduct or other ethical issues? (Select all that apply.)

- Hotline
- Email
- Intranet Form
- Ombudsmen
- Other (please specify)

19. Does the integrity policy or code, or other written policies, seek to protect the confidentiality of a reporting employee's identity and prohibit retaliation for good-faith use of reporting?

- Yes
- No

Explain

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20. Does the integrity policy or code, or other written policies, provide procedures for letting those who report possible violations know the result of the Company's review?

- Yes
- No

Explain

21. Does the company review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

- Yes
- No

Explain

22. Are allegations of improper action analyzed to determine if there is a systematic problem?

- Yes
- No

Explain

Section 4.2 Implementation and Monitoring: Management of Partners

23. Does the company have a written policy governing the appointment, management, and payment of Advisors which guards against corrupt practices?

- Yes
- No

Explain

24. Does the company have an agreement, concluded in a written form between the company and all of its Advisors, which contains a provision whereby the Advisor commits to comply at all times with the Integrity policy of the company and, more specifically, that no part of any payment originating from the Company will be passed on as a bribe?

- Yes
- No

Explain

25. Does the company have due diligence processes that it carries out on Advisors that assess corruption risks?

- Yes
- No

Explain

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26. Does the company have due diligence processes in respect of corruption risk that it carries out on potential offset partners and brokers?

- Yes
- No

Explain

27. Does the company use independent supplemental investigation/ third party reviews for due diligence on Advisors?

- Yes
- No

Explain

4.3 Implementation and Monitoring: Conflicts of Interest, Proprietary Info...

28. Does the company have a process for employees to declare potential conflicts of interest?

- Yes
- No

Explain

29. Does the integrity policy or code provisions or other written policies require that proprietary information of third parties be handled in accordance with the terms of its disclosure?

- Yes
- No

Explain

30. Does the integrity policy or code provisions or other written policies require that proprietary information of third parties not be received without authorization of the third party?

- Yes
- No

Explain

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31. Does your company voluntarily report to the applicable government authorities violations of applicable anti-corruption laws?

Yes

No

Explain



Section 4.4 Implementation and Monitoring: Audit

32. Does the company periodically audit its Ethics and Business Conduct or Anti-Corruption Program?

Yes

No

Explain

Section 5 – Best Practices

33. Please describe any activities your company has undertaken which you consider to be unique or best practice in dealing with any of the issues covered in the Global Principles.



Section 6 – Membership Information

34. Did a member of the Company attend the 2011 IFBEC conference?

- Yes
- No

35. Do you make available business ethics and compliance training for subcontractors, vendors or your supply chain?

- Yes
- No

Explain

36. Describe efforts to expand your anti-corruption programs this year.