

## 4. ANTI BRIBERY & CORRUPTION

No #	Question	2022 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	
29a	Joint ventures	Not Applicable
29b	Third parties acting on behalf of the Entity	NO
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)?	<b>YES</b>
31	Does the Entity have controls in place to monitor the effectiveness of their ABC programme?	<b>YES</b>
32	Does the Entity's Board or Senior Management Committee receive regular Management Information on ABC matters?	<b>YES</b>
33	Does the Entity perform an Enterprise Wide ABC risk assessment?	<b>YES</b>
33a	If Y select the frequency	<b>12 MONTHS</b>
34	Does the Entity have an ABC residual risk rating that is the net result of the controls effectiveness and the inherent risk assessment?	<b>YES</b>
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	<b>YES</b>
35b	Corruption risks associated with the countries and industries in which the Entity does business, directly or through intermediaries	<b>YES</b>
35c	Transactions, products or services, including those that involve state-owned or statecontrolled entities or public officials	<b>YES</b>
35d	Corruption risks associated with gifts and hospitality, hiring/internships, charitable donations and political contributions	<b>YES</b>
35e	Changes in business activities that may materially increase the Entity's corruption risk	<b>YES</b>

36	Does the Entity's internal audit function or other ,independent third party cover ABC Policies and Procedures?	<b>YES</b>
37	Does the Entity provide mandatory ABC training to:	
37a	Board and senior Committee Management	<b>YES</b>
37b	1st Line of Defence	<b>YES</b>
37c	2nd Line of Defence	<b>YES</b>
37d	3rd Line of Defence	<b>YES</b>
37e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	<b>NOT APPLICABLE</b>
37f	Non-employed workers as appropriate (contractors/consultants)	<b>NO</b>
38	Does the Entity provide ABC training that is targeted to specific roles, responsibilities and activities?	<b>YES</b>
39	Confirm that all responses provided in the above Section Anti Bribery & Corruption are representative of all the LE's branches	<b>YES</b>
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.	<a href="#">CACIB internet page "Fight Against Corruption"</a>