

2012

GLOBAL ANTI-BRIBERY
& ANTI-CORRUPTION PROGRAM

ANTI BRIBERY & ANTI CORRUPTION 2012

Across many countries, Dollar's operations are required to comply with a variety of anti-bribery laws, covering situations involving giftgiving, meals and entertainment, and others involving our business partners and agents.

While every function within the Company has exposure to different situations, our goal in this lesson is to help identify red flags for potentially troublesome situations and give you tools to help deal with them.

CASE FILES

But first,
a story...

↑
CLICK
NEXT

CASE FILE 1



Bobby



Meet Bobby.

At the impressionable age of five, Bobby had already learned the power of a sweet smile and a charming personality. Many times he charmed his way into his grandmother's heart and easily coerced her into buying treats that were normally off limits and into taking trips to Playland.

Over the years, as Bobby's needs became more expensive and objectionable, his grandmother became a little resistant to his charm.

CASE FILE 1



Bobby

Bobby, determined as ever, learned to offer to take out the garbage, do the dishes for a week or rake the leaves in exchange for getting what he wanted—all the harmless pursuits of a strong-willed child.

Bobby's grandmother had unwittingly encouraged her grandson to develop skills that could lead him to trouble later in life.

Sarah learned a different lesson . . .



CASE FILE 2

Sarah has just made her first serious blunder at college. She didn't leave enough time to complete a major assignment and knows she'll get a failing grade if she hands it in. Her professor, Ms. Roland, is really strict about due dates, so Sarah has decided the best course of action is to get on her professor's good side and talk her into an extended deadline.

It felt a little manipulative and Sarah had a pang of regret, but she went ahead and invited Ms. Roland out for lunch. She chose the French restaurant on the river in the hopes the impressive menu and décor would show her professor how important this was to Sarah.



Sarah



CASE FILE 2

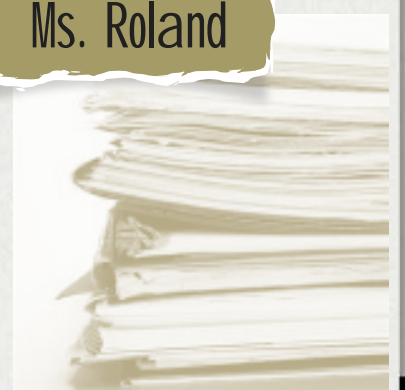
Ms. Roland, however, was taken aback at the invite and told Sarah that this was a form of bribery and was not acceptable. She added that if Sarah were to behave like this in the workplace she would be seriously reprimanded and quite likely fired.

Sarah, as she originally feared, received a failing grade on her assignment but perhaps learned an important lesson regarding bribery.

Not so with **Marcus...**



Ms. Roland



CASE FILE 3

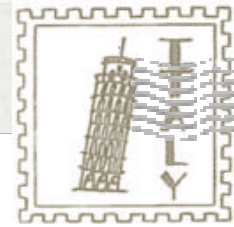


Marcus

Marcus was just promoted to VP of Global Sales for a US company. His team had the best sales record in North America and he was expected to do the same in the global market. His first target market was Italy and he set out to learn as much about their culture as he could.

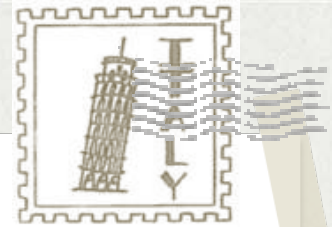
He hired a consultant to serve as his 'cultural guide' and had him tour him through the process of establishing a sales footprint and getting through all the government red tape.

VIA AEREA



CASE FILE 3

VIA AEREA



Marcus

Marcus quickly learned that in many Italian regions bribing government officials was considered a common, everyday expense of running a business. He knew that in order to be competitive in that environment, he would need to move his product quickly and have officials on his side.

He would never consider bribing government officials in North America, as this was clearly illegal and culturally unacceptable, but when in Rome . . .



... even when in Rome, as it turned out, Marcus was required to comply to US regulations. Unfortunately, he learned this as a result of a standard company compliance audit, after already having committed several small bribes.

Marcus became the subject of a full investigation and was required to submit detailed records of all his transactions. Even the donation he made to Italy's National Alliance party was under scrutiny.

He really, really wished he had checked with his legal team before jumping into action. Not only would taking these few extra steps have saved him from all this work, he would also not be facing the very real possibility of a hefty penalty or jail time!



CASE FILES 1, 2, 3



Bobby



Sarah



Marcus

All the characters in our story had lessons to learn. Although corporate anti-bribery and corruption regulations are more detailed and complex than those presented here, there are some key messages that are pretty easy to understand and follow, regardless of where you work or what your role is.

4 KEY MESSAGES



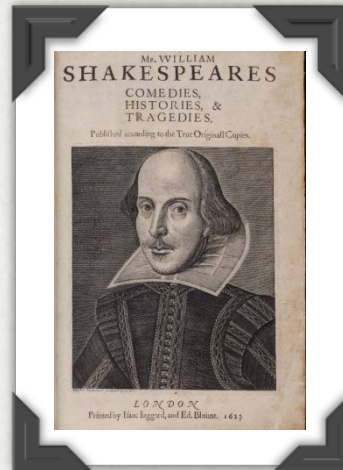
Keys to our Success

1. A Bribe Is a Bribe
2. Motivation Matters
3. DFC Rules Rule
4. We Are All in this Together



KEY MESSAGE 1: A BRIBE IS A BRIBE

From
Shakespeare's
world



To today's
corporate
world



What 's in a name?
That which we call **a rose**
By any ot her name would
smell as sweet ...

What 's in a name?
That which we call **a bribe**
By any ot her name st ill
smells fishy...



KEY MESSAGE 1: A BRIBE IS A BRIBE

In Bobby's case, a sweet smile and the promise of doing dishes . . .

Sarah's bribe, an expensive lunch . . .

For Marcus, a small cash payment . . .

In our corporate world, a bribe can include just about anything:



KEY MESSAGE 1: A BRIBE IS A BRIBE

CLICK WHAT YOU THINK IS BRIBE-WORTHY

tip, gift, perk,
favor
sweetheart deal,
kickback/payback

discount, skim,
waived fee,
waived ticket

free food, free ad,
free trip, free
tickets

inflated sale of an
object or property,
lucrative contract

donation, campaign
contribution, fund-
raiser, sponsorship/
backing

higher paying job,
stock options,
secret commission,
or job promotion

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or job promotion

All of them.

KEY MESSAGE 1: A BRIBE IS A BRIBE

CLICK WHAT YOU THINK IS BRIBE-WORTHY

In the world of corporate bribery, although a bribe can take almost any form, there is a difference between a token of appreciation and a bribe.

object or property,
lucrative contract

donation, campaign
contribution, fund-
raiser, sponsorship/
backing

higher paying job,
stock options,
secret commission,
or job promotion

KEY MESSAGE 1: A BRIBE IS A BRIBE

MATCH THE THOUGHT BEHIND THE GIFT

Just a token of
my appreciation...

- Card of thanks
- 1 ticket to a hockey game
- Business lunch at your favorite café



I'm hoping to
influence you...

- Bouquet of roses
- Season hockey tickets for 4
- Dinner/drinks for everyone in your family

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KEY MESSAGE 1: A BRIBE IS A BRIBE

MATCH THE THOUGHT BEHIND THE GIFT

How to spot the difference?

It can be tricky. If a payment is made and it seems out of line with the business relationship, industry, culture or business transaction, the government can deem it corrupt.

IF ONLY...



Regardless of their choice of payment, all three of our characters were motivated by personal gain. Had their motivation been different, this would not have been a tale of corruption.

IF ONLY...



If only I'd offered
to the dishes to show
my appreciation...

IF ONLY...



... I would have been
acting sincerely, not
manipulatively.

IF ONLY...

If only I'd asked Ms. Roland out for lunch *after* my assignment had been graded...



... I would have been acting sincerely, not manipulatively.

IF ONLY...



...no harm would have been done—it would have been a nice gesture.

...I would have been acting sincerely, not manipulatively.

IF ONLY...



...no harm would have been done—it would have been a nice gesture.

...I would have been acting sincerely, not manipulatively.

If only I'd made a regular government payment, like a service fee...

IF ONLY...



...no harm would have been done—it would have been a nice gesture.

...I would have been acting sincerely, not manipulatively.

...I would have been acting legally and ethically, like I wanted.

IF ONLY...



...no harm would have been done—it would have been a nice gesture.

Bribery, then, is a combination of the appropriateness of the payment and the payer's motivation...

Motivation matters.



KEY MESSAGE 2: MOTIVATION MATTERS



Any payment , no matter what form it's in, is considered corrupt if it was intended to secure an improper business advantage.

When making a payment that might seem dubious under someone else's scrutiny, ask yourself:

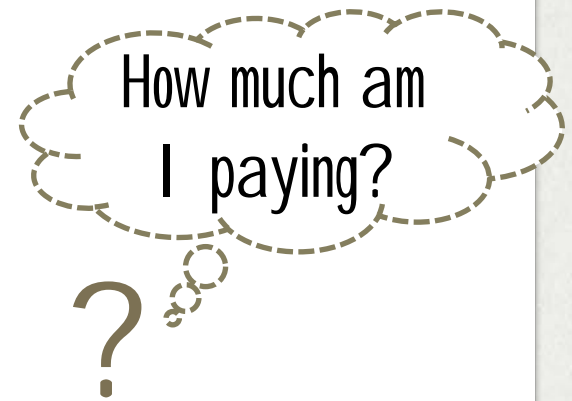
?

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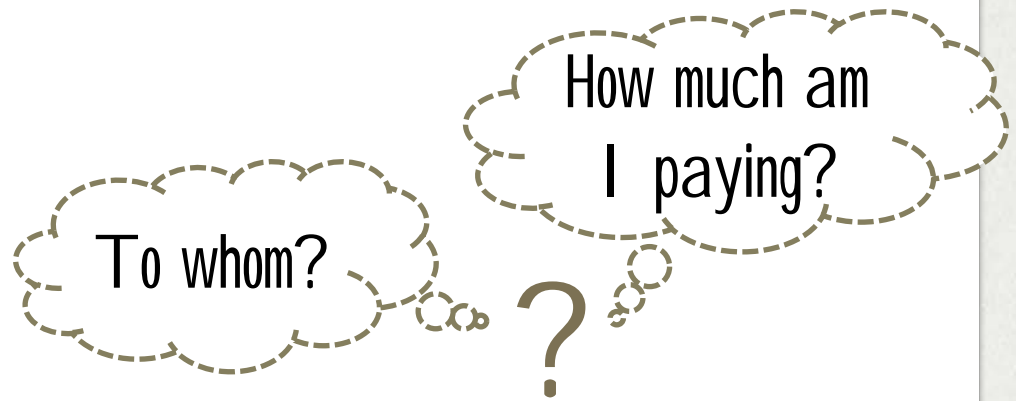
KEY MESSAGE

2: MOTIVATION MATTERS



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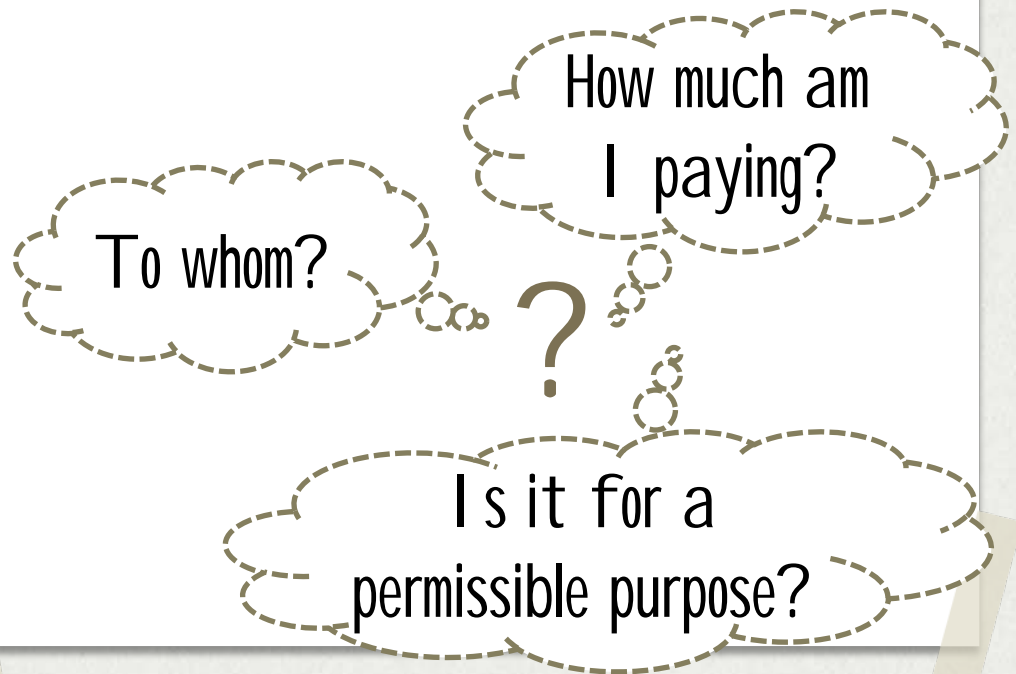
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2: MOTIVATION MATTERS



Any payment , no matter what form it's in, is considered corrupt if it was intended to secure an improper business advantage.

When making a payment that might seem dubious under someone else's scrutiny, ask yourself:

To whom?

How much am I paying?

?

Is it for a permissible purpose?

TAKE NOTE: Record this information so that you can confidently answer questions if they arise.

KEY MESSAGE 2: MOTIVATION MATTERS

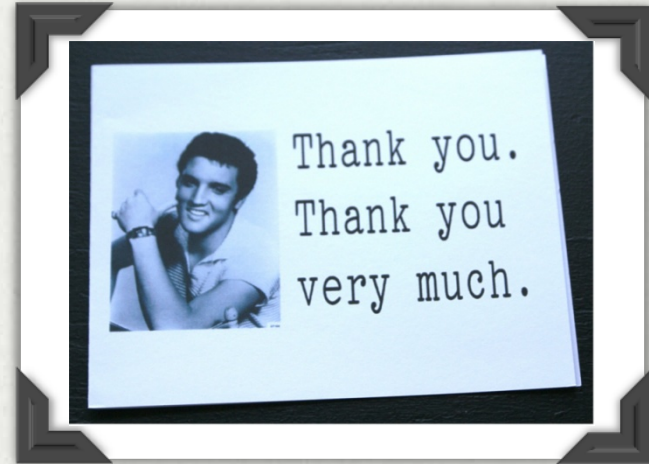
By this time in your career, you've had plenty of occasions to feel grateful. Expressing our gratitude is important and is often a rewarding experience for you, as well as the recipient.

Working for a publicly traded company such as DFC demands that we take a second look at how we express our gratitude to make sure we're not crossing an important line.

KEY MESSAGE 2: MOTIVATION MATTERS

GUIDELINES:

- Give culturally appropriate and reasonably priced gifts
- Intrinsic value of item should not exceed its ceremonial value
- Don't give cash or cash equivalents
- Putting a company logo on an expensive gift does not make it permissible



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Elvis thank-you card? **YES**



Trip to Vegas? **NO**

KEY MESSAGE 2: MOTIVATION MATTERS

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- Intrinsic value of item should not exceed its ceremonial value
- Don't give cash or cash equivalents

It's not the gift that matters; it's the thought behind it.



Elvis thank-you card? **YES**



Trip to Vegas? **NO**

KEY MESSAGE 2: MOTIVATION MATTERS

The Devil is in the Details:

- Instead of high-value gifts (e.g., golf clubs, jewelry), give items of minimal value (logo pens, caps, etc).
- Tailor the value of the gift, meal or other payment to the standard of living in the country where it is made.
- The gift should be commensurate with the legitimate and generally accepted local custom for such expenses by private business persons in the country.
- If the intrinsic value of the item exceeds its ceremonial value, check with the Legal Department before purchasing it.
- Don't give cash (or cash equivalents, such as gift cards), even if that is the local tradition.

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- If the intrinsic value of the item exceeds its ceremonial value, the item must be approved by the Department before given.
- If the item is a cash equivalent (e.g., gift cards), the value of the gift should be commensurate with local tradition.

TAKE NOTE: Record all gifts given, including the value or amount spent per person, and the legitimate business purpose for the gift.

KEY MESSAGE 2: MOTIVATION MATTERS



In regards to our ethics meter, whether we pay for a 3rd party's meals/entertainment depends on the circumstances:

- What is the value of the meal relative to other party's financial position and standard of living?
- Have we paid for meals for the same party on multiple occasions?
- Is there a business purpose for the event?

KEY MESSAGE 2: MOTIVATION MATTERS



In regards to our ethics meter, whether we pay for a 3rd party's meals/entertainment depends on the circumstances:

- What is the value of the meal relative to other party's financial position and standard of living?

Motive: An unreasonable expense is strong evidence of corrupt intent. Even if you are behaving completely ethically, your actions might suggest otherwise. Sometimes it's wise to choose a better way.

KEY MESSAGE 2: MOTIVATION MATTERS



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Pay for a meal with a foreign official or other 3rd party in appropriate circumstances.
(Don't pay for their family.)



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Ensure the value of the meal reflects the party's position in their organization and the overall standard of living in the country.



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Ensure the value of the meal reflects the party's position in their organization and the overall standard of living in the country.

For example, you wouldn't take a company president to a fast food drive-thru, nor would you take a customs clerk to your city's foremost culinary experience.



KEY MESSAGE 2: MOTIVATION MATTERS

Pay for a meal with a foreign official or other 3rd party in appropriate circumstances. (Don't pay for their family.)

Record all payments accurately, including the amount spent per person and the number of officials at the event.

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For example, you wouldn't take a company president to a fast food drive-thru, nor would you take a customs clerk to your city's foremost culinary experience.

Make the payment directly to the restaurant.



KEY MESSAGE 2: MOTIVATION MATTERS

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Treat attendees' travel expenses the same as colleagues.



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Pay travel expenses directly to providers, rather than via reimbursement, to ensure the money goes where you think it's going.



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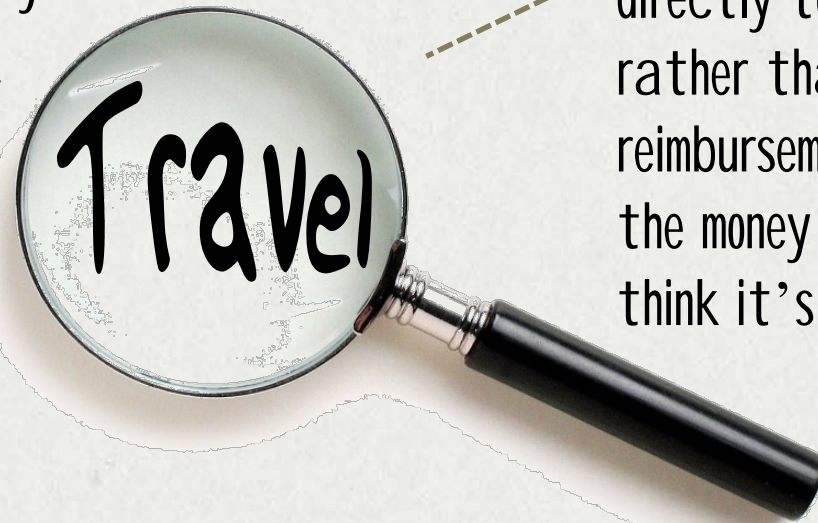
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Don't pay for golf outings, sightseeing side trips, etc—even if business is discussed—if the primary purpose is simply "relationship building."



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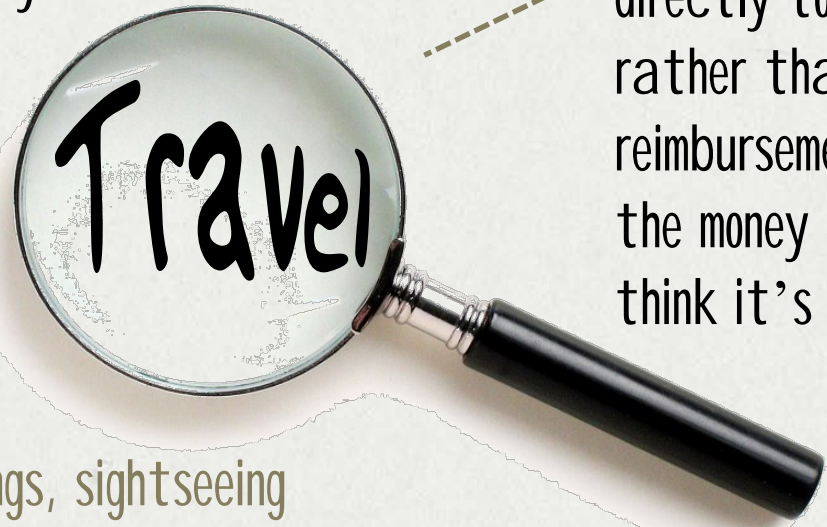
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Don't pay for golf outings, sightseeing side trips, etc—even if business is discussed—if the primary purpose is simply "relationship building."

Don't pay the travel expenses of the other party's family members.



KEY MESSAGE 3: DFC RULES RULE

Many governments have instituted laws regarding bribery and corruption in the corporate world.

This is great news. These laws level out the playing field in a competitive, high-stakes market. They protect law-abiding citizens and provide a framework to ensure our economy is guided by supply and demand, not unscrupulous dealmakers.

Most of the regulations have common themes and requirements, with some variance from country to country. DFC has written our policies and procedures to meet regulations across the globe. We have eliminated gaps and removed gray areas by setting our policies to meet the highest global standards.



KEY MESSAGE 3: DFC RULES RULE

Many governments have instituted laws regarding bribery and corruption in the corporate world.

When in doubt, your legal team will answer questions and guide your behavior to ensure that you are acting in the best interests of our company and yourself.

Most of the regulations have common themes across the globe. We have eliminated gaps and removed gray areas by setting our policies to meet the highest global standards.

KEY MESSAGE 3: DFC RULES RULE

There are many recriminations for engaging in corrupt behavior. Your role as a leader of our corporation demands that you stretch beyond our legal requirements and act in accordance with your own high ethical standards.

If, like Sarah, you experience a pang of guilt or need to pause to second guess your choices, then it might be wise to turn up that ethics meter and choose a different, uncompromised course of action.



KEY MESSAGE 3: DFC RULES RULE

The news is full of corporate leaders who have chosen corruption over virtue. They have suffered a wide range of consequences including:



KEY MESSAGE 3: DFC RULES RULE

What does virtue look like?



KEY MESSAGE 3: DFC RULES RULE

What does virtue look like?



Bride in white? **YES**



Bride in booking? **NO**

KEY MESSAGE 3: DFC RULES RULE

CLICK WHAT YOU THINK THEIR COMPANIES SUFFERED

Loss of
reputation
Loss of business

Lowered
employee
morale

Significant
legal costs
Civil lawsuits

Fines from \$2
to \$25 million

Forfeiture of
property

Debarment from
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Loss of business

Lowered employee morale

Significant legal costs
Civil lawsuits

Fines from \$2 to \$25 million

Forfeiture of property

Debarment from government contracts

All of them.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

At DFC, we are confident that the employees we hire are ethical. It's a little trickier to extend the same level of confidence to the vendors, suppliers and business partners we work with.

Part of your role then is to make sure you've contracted people who are ethical, and to make sure they understand and follow our high standards.

There are several checks you can do to make sure we have the right people on our team...



Pickmepickmepick
mepickme...

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

CHECKS:

- Conduct due diligence and/or background checks (business, history, 3rd party relationships)
- Include 'Anti-Corruption Certification' in your written contracts
- Require specifics about fees & services
- Insist on detailed invoicing
- Arrange audits of books & records



Know who you
are doing
business
with!

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

STANDARDS:

- Only agree to pay retainers or advances for specified, appropriate services
- Only do business with agents who provide compliance certifications
- Only do business with agents who consent to DFC audits of their books
- Hire 3rd parties who are personally disassociated from government officials (or seek approval from our Legal Department)



Know who you
are doing
business
with!

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

We are responsible for the actions that 3rd parties take on our behalf, whether we have actual knowledge of those activities or not. Thus, it is critical that we learn as much as we can about all agents, consultants, brokers, advisors and others we deal with.

At a minimum, determine whether a prospective agent has personal or professional ties to the other party/parties to the business transaction. Know the number and reputation of the agent's clients, and if the agent is in another country; know their reputation with our embassy or consulate, local bankers, clients and other business associates.

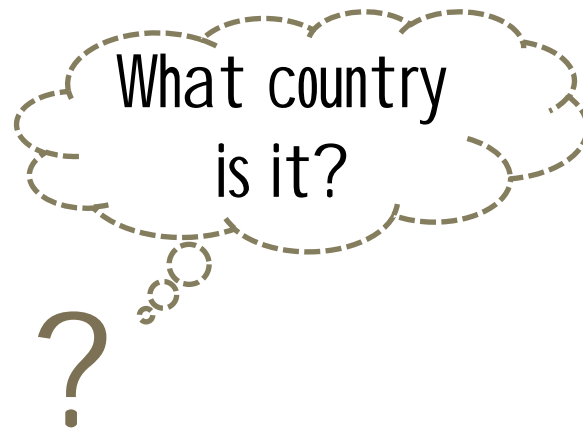
KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

Answer these questions as well, so that we can assess the legality of the consultant's arrangement.

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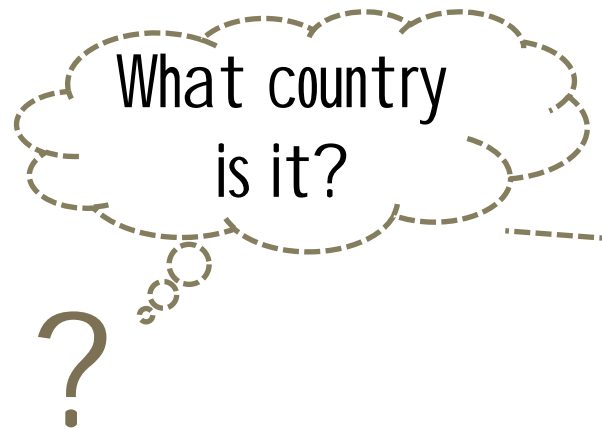
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Transactions in high-risk countries are a red flag of possible corrupt payments.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

Answer these questions as well, so that we can assess the legality of the consultant's arrangement.

How much will the agent be paid?

What country is it?

?

Transactions in high-risk countries are a red flag of possible corrupt payments.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

Answer these questions as well, so that we can assess the legality of the consultant's arrangement.

How much will the agent be paid?

Large payments to brokers or agents are a red flag of possible corrupt payments.

What country is it?

Transactions in high-risk countries are a red flag of possible corrupt payments.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

Answer these questions as well, so that we can assess the legality of the consultant's arrangement.

How much will the agent be paid?

Large payments to brokers or agents are a red flag of possible corrupt payments.

What country is it?

Transactions in high-risk countries are a red flag of possible corrupt payments.

What are the local processing fees?

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER

Answer these questions as well, so that we can assess the legality of the consultant's arrangement.

How much will the agent be paid?

Large payments to brokers or agents are a red flag of possible corrupt payments.

What country is it?

Transactions in high-risk countries are a red flag of possible corrupt payments.

What are the local processing fees?

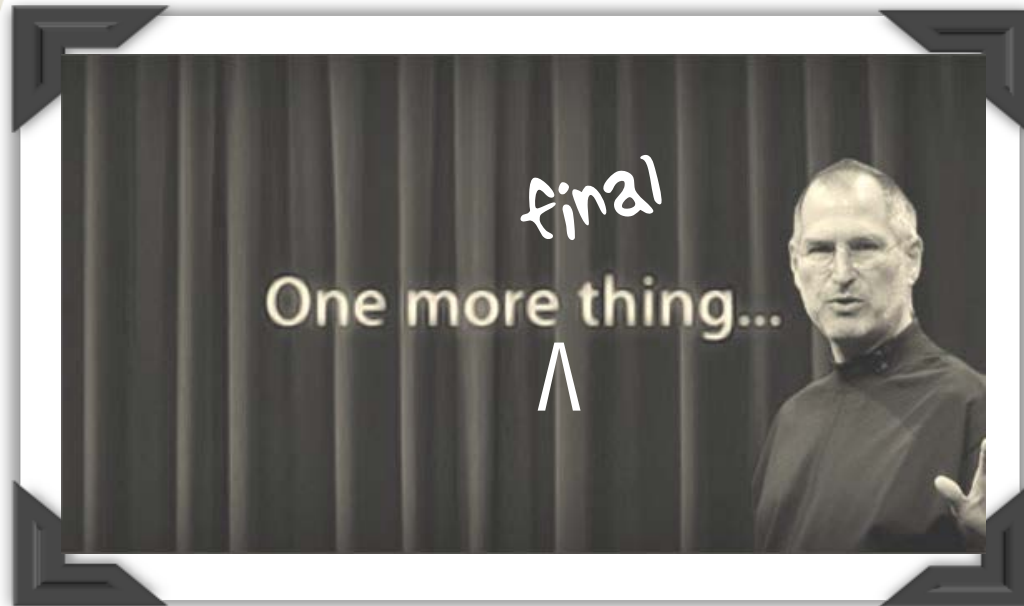
Payments with vague terms that don't describe the actual work performed are a red flag of possible corrupt payments.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER



It is not enough that someone "recommends" a given agent. You must know who we are doing business with, what he or she is doing to earn a fee, and that he or she is qualified to be doing it.

KEY MESSAGE 4: WE'RE ALL IN THIS TOGETHER



It starts with you, but it doesn't end with you. Know who your staff is giving gifts to and what the gifts are. Make sure your team understands and supports your accountability.

4 KEY MESSAGES

Now that you have read about our key messages,

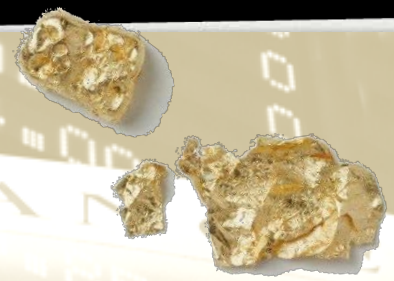
1. A Bribe Is a Bribe
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put your understanding to the test...

There are 6 quick questions to answer, then 2 'Statements of Commitment' to electronically 'sign off' on. Once you have completed both of these, you will have complied with our training requirement.



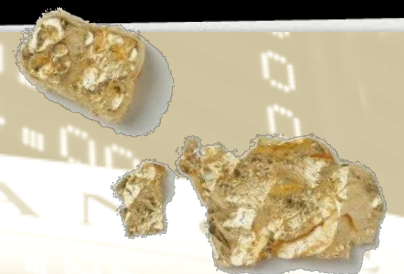
APPLY WHAT YOU'VE LEARNED



SITUATION 01:

With the help of a local broker, we entered into an agreement to sell gold to SmeltMax. We paid the broker a large albeit appropriate commission for her work. The broker then tried to find new gold smelters for us in other countries. You have learned that the local broker might be using part of her commission from the Company to buy lavish gifts for executives of other gold smelting companies. Is there a "corrupt payment" issue here?

APPLY WHAT YOU'VE LEARNED



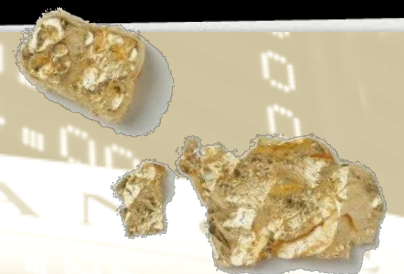
RESPONSE:

A. Yes, we can't ignore "red flags" that signal possible corrupt activities by anyone associated with our business.

B. No, because we didn't make any gifts, nor did we have direct knowledge that our local broker did.

C. Maybe, if the local broker was giving monetary gifts to the gold smelting executives.

APPLY WHAT YOU'VE LEARNED



RESPONSE:

A. Yes, we can't ignore "red flags" that signal possible corrupt activities by anyone associated with our business.

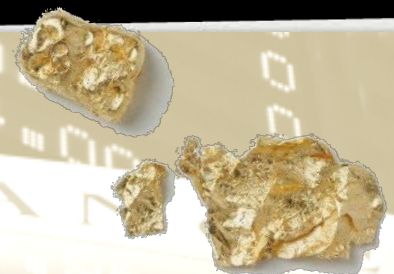
B. No, because we didn't make any gifts, nor did we have direct knowledge that our local broker did.

C. Maybe, if the local broker was giving monetary gifts to the gold smelting executives.



try again

APPLY WHAT YOU'VE LEARNED



BEST RESPONSE:

A. Yes, we can't ignore "red flags" that signal possible corrupt activities by anyone associated with our business.

B. No, because we didn't make any gifts, nor did we have direct knowledge that our local broker did.

C. Maybe, if the local broker was giving monetary gifts to the gold smelting executives.



good job

APPLY WHAT YOU'VE LEARNED



SITUATION °2:

You are hiring a consultant to assist you with developing a plan to acquire a business in Spain. This is a key role and you need the right person on board. A quick check on the Internet reveals that your favorite candidate has done a lot of excellent work around the globe. There are, however, two blogs that imply she has been involved in some questionable financial activity with government officials—details are sketchy. What is your best course of action, ethically and legally speaking?



APPLY WHAT YOU'VE LEARNED

RESPONSE:

A. Contact the Legal Department for advice on how to find the facts of the situation. Blogs are not reliable sources on their own.

B. Ask the consultant for an explanation.

C. Accept the information on the blog as true and do not hire the consultant.



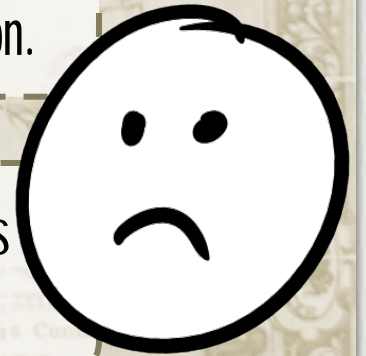
APPLY WHAT YOU'VE LEARNED

RESPONSE:

A. Contact the Legal Department for advice on how to find the facts of the situation. Blogs are not reliable sources on their own.

B. Ask the consultant for an explanation.

C. Accept the information on the blog as true and do not hire the consultant.



try
again



APPLY WHAT YOU'VE LEARNED



BEST RESPONSE:



A. Contact the Legal Department for advice on how to find the facts of the situation. Blogs are not reliable sources on their own.



B. Ask the consultant for an explanation.



C. Accept the information on the blog as true and do not hire the consultant.



good job

APPLY WHAT YOU'VE LEARNED

SITUATION °3:



Ken is a senior manager in our Finance Department and has worked with auditors at FINTRAC (the Financial Transactions and Reports Analysis Centre of Canada) for several years. They have provided helpful information and feedback over the years and he would like to show his appreciation. He is considering several options but wants to make sure he follows our giftgiving policies. Which of Ken's options will best follow our policies?

APPLY WHAT YOU'VE LEARNED

RESPONSE:

A. Send each member of the FINTRAC audit team a card of thanks and a box of chocolates.

B. Host a dinner at a fine restaurant and pay for all of the food and drinks for the team and their spouses.

C. Take the team members on a 3-day trip to Las Vegas.



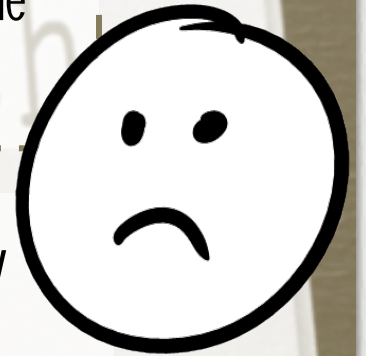
APPLY WHAT YOU'VE LEARNED

RESPONSE:

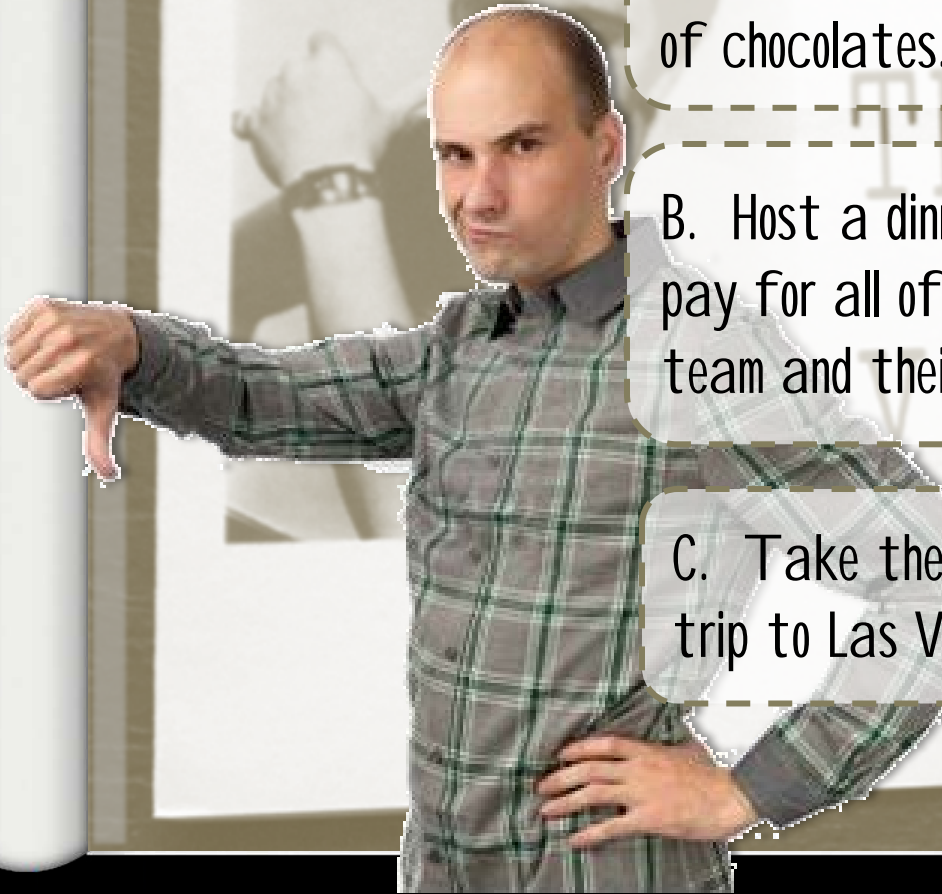
A. Send each member of the FINTRAC audit team a card of thanks and a box of chocolates.

B. Host a dinner at a fine restaurant and pay for all of the food and drinks for the team and their spouses.

C. Take the team members on a 3-day trip to Las Vegas.



try
again



APPLY WHAT YOU'VE LEARNED

BEST RESPONSE:

A. Send each member of the FINTRAC audit team a card of thanks and a box of chocolates.

B. Host a dinner at a fine restaurant and pay for all of the food and drinks for the team and their spouses.

C. Take the team members on a 3-day trip to Las Vegas.



good
job



APPLY WHAT YOU'VE LEARNED

SITUATION °4:

In our global economic climate, some countries are more susceptible to corruption than others. You are working with a vendor who is trying to sell you imported supplies. When you question how much it will cost to get the supplies across the border, he tells you not to worry, he'll work it into the total price. The response that will best protect our assets is:

"Don't worry 'bout it— just sign right here..."



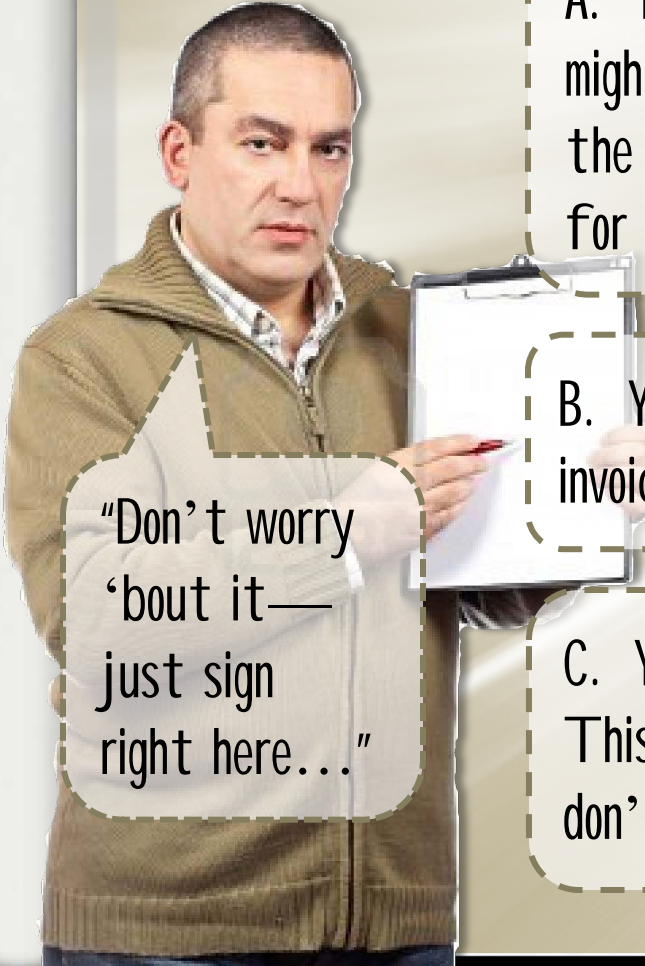
APPLY WHAT YOU'VE LEARNED

RESPONSE:

A. You are concerned that his vague answer might indicate that he is getting supplies across the border using unethical means. You ask him for a detailed quote before proceeding.

B. You agree to his terms and ask for a detailed invoice once you receive the goods. He agrees.

C. You end your business relationship immediately. This is an obvious case of corruption and you don't want any part of it.



"Don't worry 'bout it— just sign right here..."

APPLY WHAT YOU'VE LEARNED

RESPONSE:

A. You are concerned that his vague answer might indicate that he is getting supplies across the border using unethical means. You ask him for a detailed quote before proceeding.

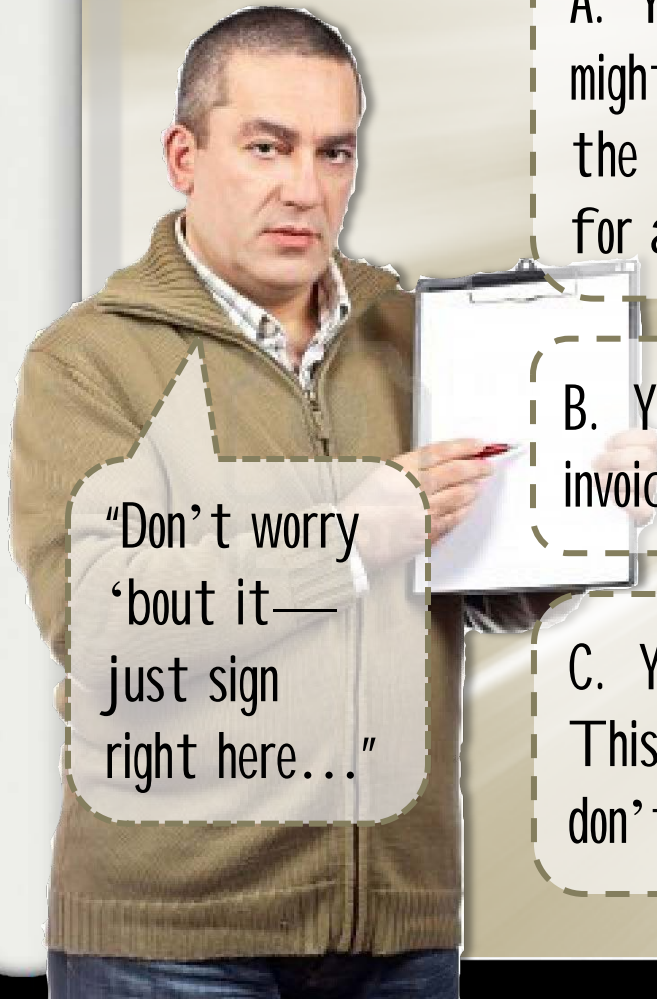
B. You agree to his terms and ask for a detailed invoice once you receive the goods. He agrees.

C. You end your business relationship immediately. This is an obvious case of corruption and you don't want any part of it.

"Don't worry 'bout it— just sign right here..."



try again



APPLY WHAT YOU'VE LEARNED

BEST RESPONSE:

✓ A. You are concerned that his vague answer might indicate that he is getting supplies across the border using unethical means. You ask him for a detailed quote before proceeding.

~~B. You agree to his terms and ask for a detailed invoice once you receive the goods. He agrees.~~

~~C. You end your business relationship immediately. This is an obvious case of corruption and you don't want any part of it.~~

"Don't worry 'bout it— just sign right here..."



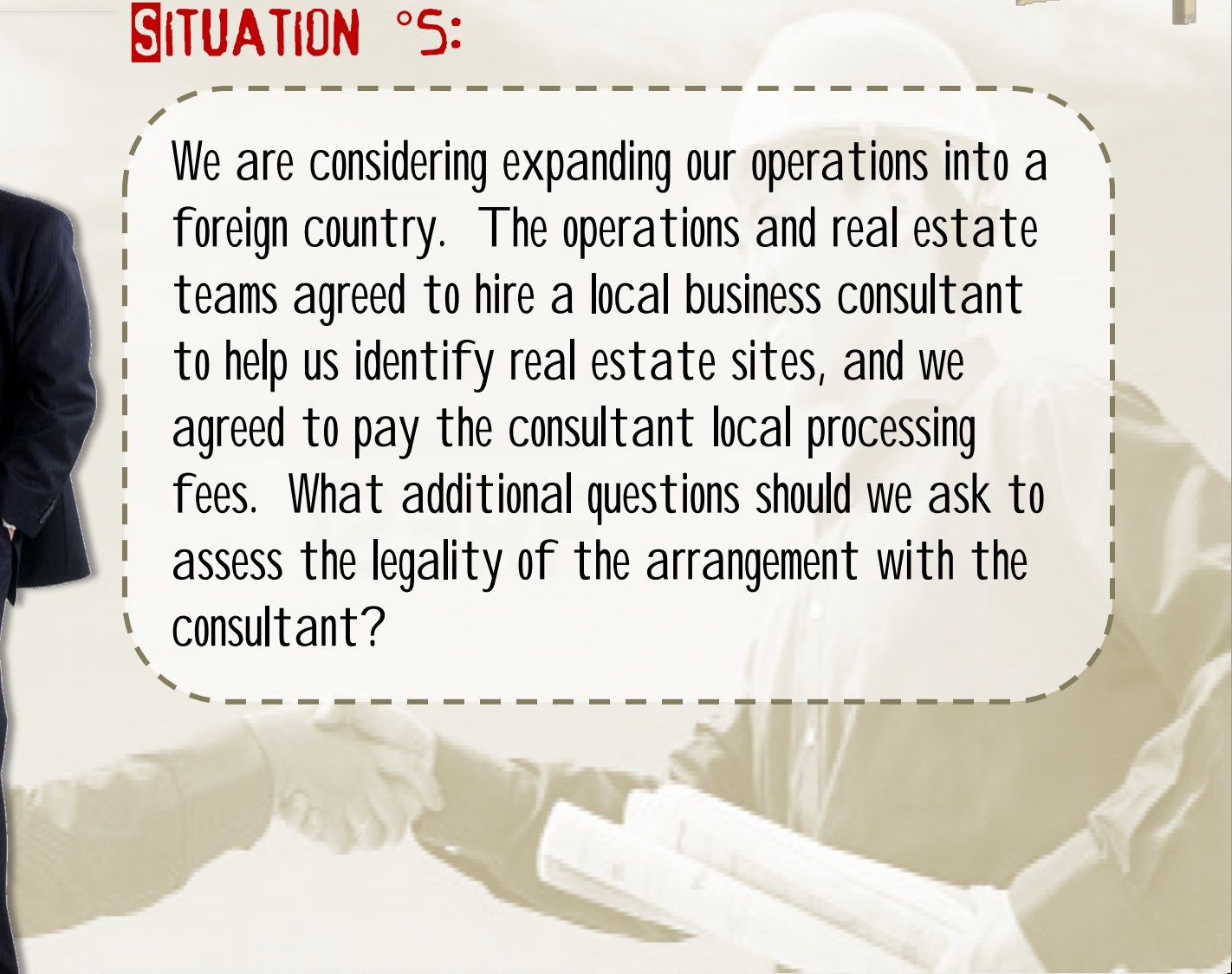
good job

APPLY WHAT YOU'VE LEARNED



SITUATION °5:

We are considering expanding our operations into a foreign country. The operations and real estate teams agreed to hire a local business consultant to help us identify real estate sites, and we agreed to pay the consultant local processing fees. What additional questions should we ask to assess the legality of the arrangement with the consultant?

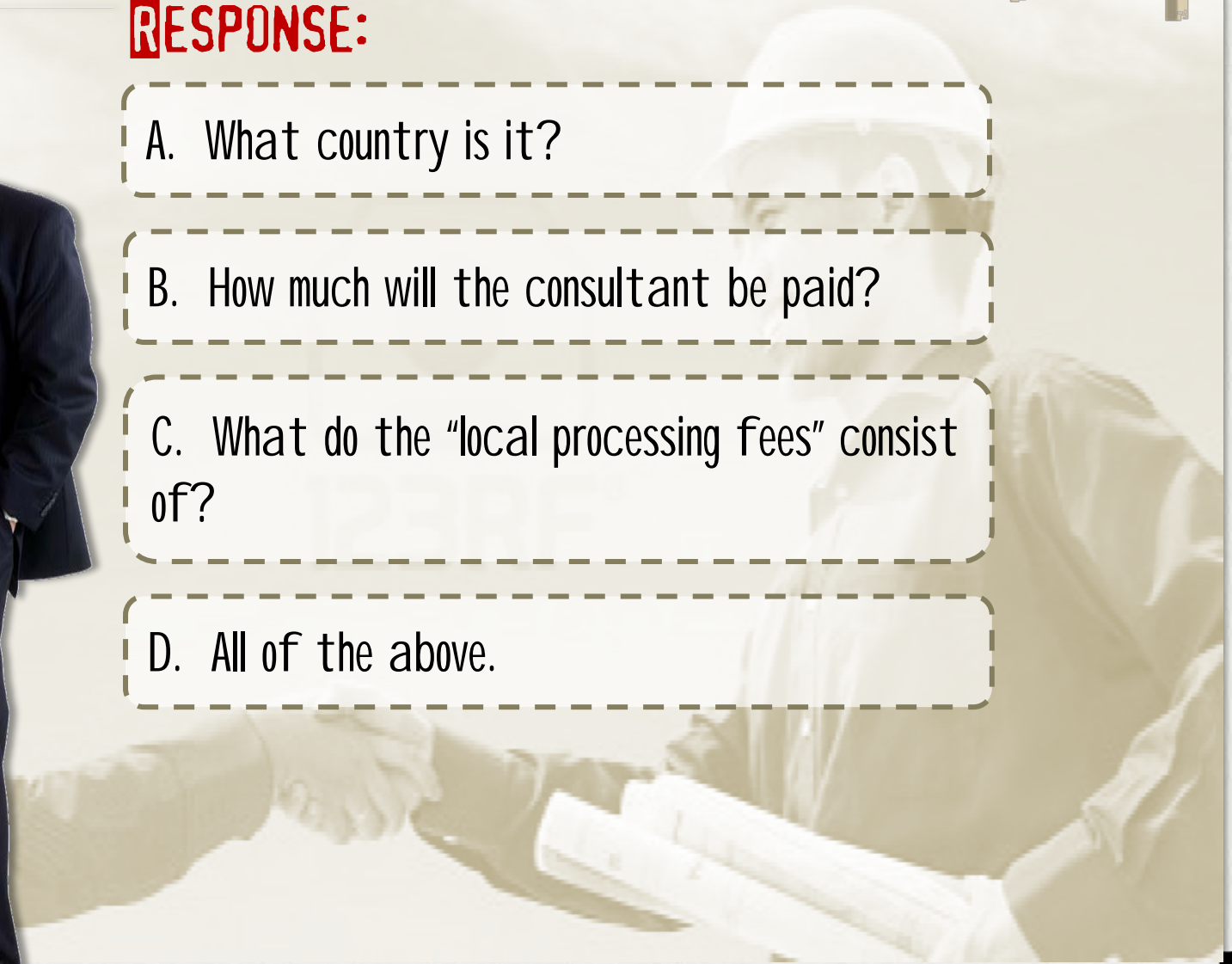


APPLY WHAT YOU'VE LEARNED



RESPONSE:

- A. What country is it?
- B. How much will the consultant be paid?
- C. What do the "local processing fees" consist of?
- D. All of the above.

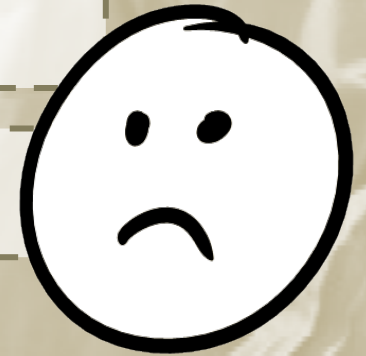


APPLY WHAT YOU'VE LEARNED

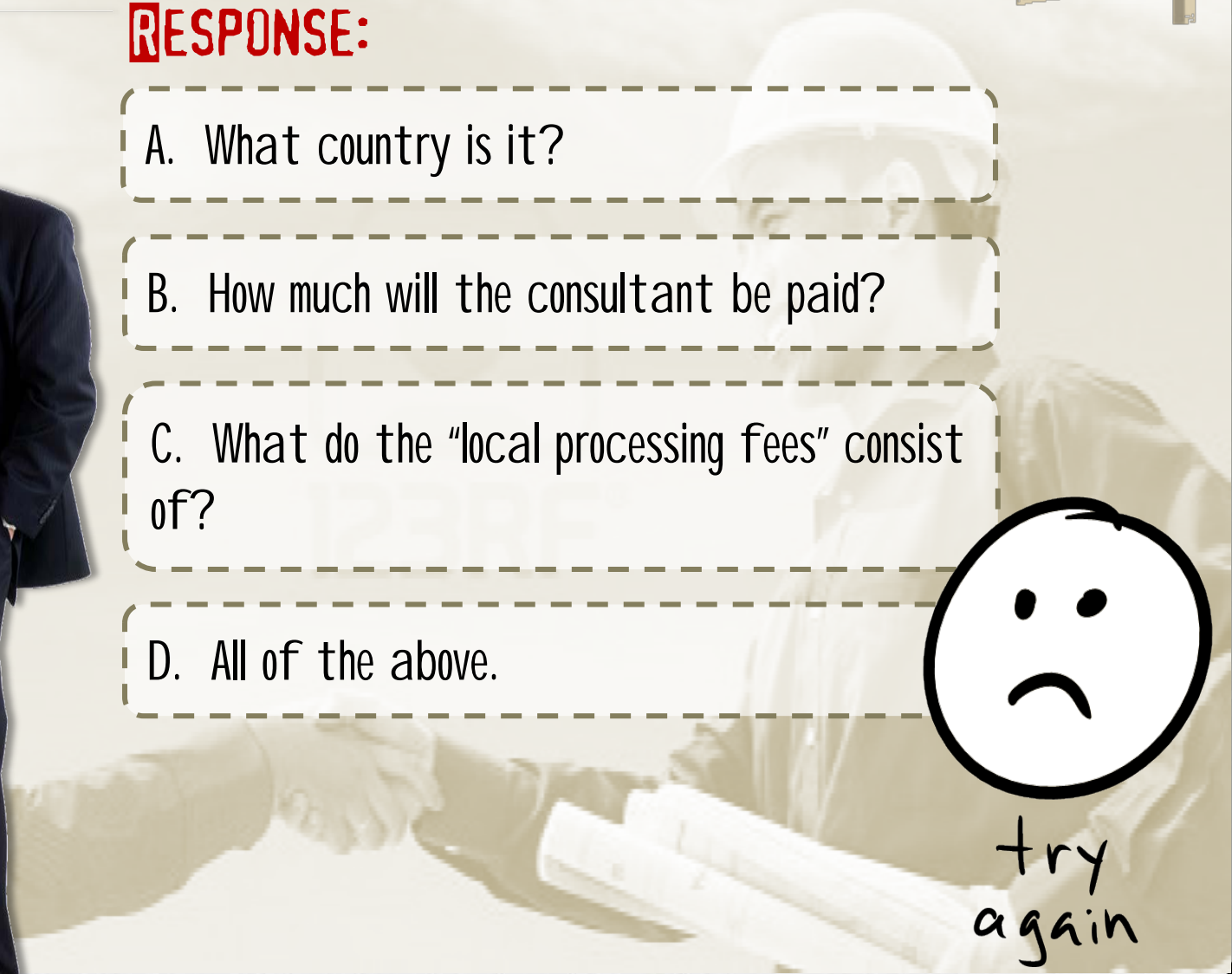


RESPONSE:

- A. What country is it?
- B. How much will the consultant be paid?
- C. What do the "local processing fees" consist of?
- D. All of the above.



try
again



APPLY WHAT YOU'VE LEARNED



BEST RESPONSE:



- A. What country is it?
- B. How much will the consultant be paid?
- C. What do the "local processing fees" consist of?
- D. All of the above.



good job

APPLY WHAT YOU'VE LEARNED



SITUATION °6:

Bob from I T and Mary from accounting put their heads together and devised a way to reduce our licensing fees by using Twitter to make “micro-payments” to officials in various jurisdictions. It’s a new and untested approach that could save the Company huge amounts of money. Should we try it?

APPLY WHAT YOU'VE LEARNED



RESPONSE:

A. Yes, because enforcement authorities would be lenient on something new and untested. We are only required to comply to specific and listed violations.

B. No, unless we get prior approval from the Legal Department. Companies can be fined and individuals can go to jail for violations that authorities have never applied before.

APPLY WHAT YOU'VE LEARNED



RESPONSE:

A. Yes, because enforcement authorities would be lenient on something new and untested. We are only required to comply to specific and listed violations.

B. No, unless we get prior approval from the Legal Department. Companies can be fined and individuals can go to jail for violations that authorities have never applied before.



try
again

APPLY WHAT YOU'VE LEARNED



BEST RESPONSE:



A. Yes, because enforcement authorities would be lenient on something new and untested. We are only required to comply to specific and listed violations.



B. No, unless we get prior approval from the Legal Department. Companies can be fined and individuals can go to jail for violations that authorities have never applied before.



good job

EMPLOYEE STATEMENT OF COMMITMENT

It can be difficult to know for sure if a business partner is ethical and compliant with government regulations. Your role requires looking for red flags such as:

- the transaction occurs in a high-risk country or region
- the agent is vague or refuses to disclose details regarding its business relationships and financial obligations
- the agent prefers you make payment via a 3rd party or cash
- unusually high commissions or associated fees
- the agent doesn't appear to know what they're doing or have the necessary resources

I am committed to maintaining a high degree of awareness regarding the behavior of anyone connected to our company.

EMPLOYEE STATEMENT OF COMMITMENT

It can be difficult to know for sure if a business partner is ethical and compliant with government regulations. Your role requires looking for red flags such as:

- the transaction occurs in a high-risk country or region

We are counting on you to help us maintain the best anti-bribery and corruption compliance program possible. You are "in the trenches", where you can see how our business operates day to day — and whether we are doing so in keeping with our compliance program and applicable laws.

EMPLOYEE STATEMENT OF COMMITMENT

If you encounter any corrupt payment red flags or spot any related issues, it is your duty to "report up"--inform your supervisor or the Legal Department, or report issues via the company's hotline or other reporting mechanisms.

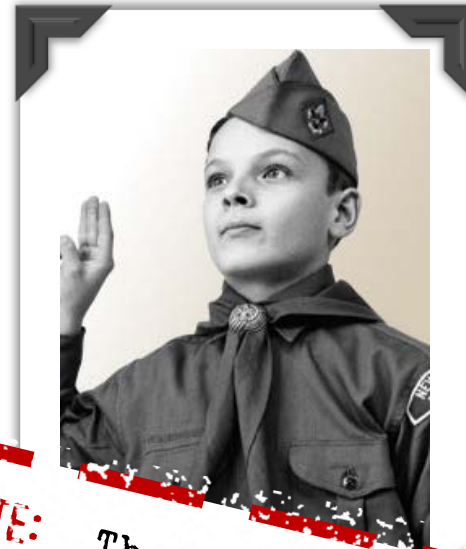
The company will conduct a prompt and thorough investigation, which may include interviewing you and other witnesses, collecting and reviewing relevant documents, and consulting outside counsel.



EMPLOYEE STATEMENT OF COMMITMENT

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The company will promptly investigate, which may include interviews and other witness interviews, collecting and reviewing relevant documents, and consulting outside



TAKE NOTE: The company is prohibited from retaliating against an employee for making a good-faith report, for refusing to comply with a violation of law or for participating in an investigation of the matter.

EMPLOYEE STATEMENT OF COMMITMENT

It's easy to say "Don't bribe." But situations may come up on a day-to-day basis that are far less clear.

If it doesn't feel right, please bring the question to your supervisor or a member of the Legal Department.



- I am committed to upholding DFC's Anti-Bribery & Anti-Corruption standards and I will report any issues in good faith.

THANK YOU FOR
YOUR PARTICIPATION

