### BRIBERY ACT 2010 RISK ASSESSMENT

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| Name of firm: | Click or tap here to enter text. |
| Completed by: | Click or tap here to enter text. | Date: | Click or tap to enter a date. |

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|  | **Question** | **Answer** | **Comments** |
|  | **Governance** |
|  | Does your firm have in place anti-bribery policies and procedures? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm provide training on anti-bribery policies and procedures? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm operate only in UK? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm have a parent company, branches, subsidiaries, etc which could be considered a complex structure? | Choose an item. | Click or tap here to enter text. |
|  | Has your firm's senior management made a clear commitment to preventing bribery and corruption? | Choose an item. | Click or tap here to enter text. |
|  | Has your firm appointed a member of senior management with responsibility for implementing, monitoring and reviewing anti-bribery measures? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm have clear and well-communicated disciplinary procedures for breaches of applicable anti-bribery policies and procedures? | Choose an item. | Click or tap here to enter text. |
|  | **Gifts and hospitality** |
|  | Does your firm offer or accept gifts or hospitality? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm have a value threshold over which it does not accept gifts or hospitality, or formal written approval is required? | Choose an item. | Click or tap here to enter text. |
|  | If yes, what is that value? | Click or tap here to enter text. | Click or tap here to enter text. |
|  | Does your firm operate a gifts and hospitality register? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm allow facilitation payments in any jurisdiction? | Choose an item. | Click or tap here to enter text. |
|  | **Associated persons***(For the purposes of the Bribery Act 2010 an associated person is any person who provides services for or on behalf of the firm)* |
|  | How many associated persons does your firm have? | Click or tap here to enter text. | Click or tap here to enter text. |
|  | Does any associated person receive performance-based remuneration or bonus payments? | Choose an item. | Click or tap here to enter text. |
|  | Does any associated person operate with a high degree of autonomy or without supervision? | Choose an item. | Click or tap here to enter text. |
|  | Does any associated person work closely with individual clients, without the supervision or involvement of others? | Choose an item. | Click or tap here to enter text. |
|  | Does any associated person have the authority to execute transactions or bind the firm independently, without the supervision or involvement of others? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm carry out bribery risk due diligence on its associated persons? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm include contractual provisions with associated persons that explicitly prohibit bribery and corruption? | Choose an item. | Click or tap here to enter text. |
|  | **Clients** |
|  | Does your firm act for High-Net-Worth Individuals? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm act for Politically Exposed Persons? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm act for Foreign Public Officials or organisations? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm operate with clients in high-risk sectors e.g., Oil and Gas/Mining, Banking/Financial Services, Pharmaceuticals, Transportation, Construction, Property, Telecommunications etc which presents higher risk of bribery and corruption? | Choose an item. | Click or tap here to enter text. |
|  | **Procurement** |
|  | Does your firm participate in procurement exercises. *If no, the remainder of this section can be marked N/A* | Choose an item. | Click or tap here to enter text. |
|  | If yes, what type of transactions? |  | Click or tap here to enter text. |
|  | Do the transactions involve the use of agent or intermediaries? | Choose an item. | Click or tap here to enter text. |
|  | Do the agents or intermediaries earn a commission or otherwise receive payment for their involvement? | Choose an item. | Click or tap here to enter text. |
|  | Do the transactions involve payments from an entity or person that is not party to the transaction? | Choose an item. | Click or tap here to enter text. |
|  | Does your firm carry out due diligence on third parties? | Choose an item. | Click or tap here to enter text. |
|  | Do any third parties have delegated authority to bind your firm? | Choose an item. | Click or tap here to enter text. |
|  | Do the transactions require or entail the involvement of foreign public officials? | Choose an item. | Click or tap here to enter text. |
|  | Do the transactions entail making payments to government or local officials? | Choose an item. | Click or tap here to enter text. |
|  | Do the transactions involve a payment deemed a charitable or political contribution? | Choose an item. | Click or tap here to enter text. |
|  | Do counterparties in the transactions (including its branches, subsidiaries and parent) operate in a country with a high bribery and corruption risk rating? | Choose an item. | Click or tap here to enter text. |
|  | Are counterparties(or their associated persons) the subject to anti-bribery and corruption related adverse media? | Choose an item. | Click or tap here to enter text. |
|  | Are anti-bribery provisions included in transaction agreement(s)? | Choose an item. | Click or tap here to enter text. |
|  | Are the associated persons individual/sole traders or entities? | Choose an item. | Click or tap here to enter text. |
|  | Are associated persons selected by way of a tendering or bidding process? | Choose an item. | Click or tap here to enter text. |
|  | If so, do you have in place clear policies and procedures which ensure transparency and fairness in the tendering or bidding process? | Choose an item. | Click or tap here to enter text. |
|  | **Risk conclusion** |
|  | After having given consideration to our firms operations and the controls in place, the overall risk is concluded as being: | Choose an item. | Click or tap here to enter text. |

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| ***Action points*** |
| *Detail below any action required in respect of any answers which have notes.* |
| Click or tap here to enter text. |
| *Action points cleared by:* | Click or tap here to enter text. |  | *Date:* | Click or tap to enter a date. |
| *Partner:* | Click or tap here to enter text. |  | *Date:* | Click or tap to enter a date. |