

Attachment 2 - Bribery and Corruption Risk Flags

Examples of behaviours and activities that may be indicative of a Bribery and Corruption risk:

- give, promise to give, or offer a payment, Gift or Hospitality with the expectation that a business Advantage will be received, or to reward a business Advantage already given;
- give or accept a Gift or Hospitality during any commercial negotiations or tender process, if this could be perceived as intended or likely to influence the outcome;
- accept a payment, Gift or Hospitality from a Third Party that is known or suspected to be offered with the expectation that Iress will provide a business Advantage for the recipient or anyone else in return;
- accept Hospitality from a Third Party that is unduly lavish or extravagant in the circumstances;
- give or offer any payment (sometimes called a Facilitation Payment) to a Public Official in any country to facilitate or speed up a routine or necessary procedure;
- threat or retaliate against an individual who has refused to commit a Bribery offence or who has raised concerns under this Policy;
- use of consultants or vendors who serve no clear purpose, or a forced or strongly recommended use of a vendor who would not meet Iress' procurement standards;
- adverse news, background or reputation (for example, prior corruption or a negative reputation for integrity);
- transaction or intermediary suggested by a Public Official, particularly one connected to the business or matter at issue;
- close business, personal, or family relationship with a Public Official or Third Party who has discretion over the business or transaction at issue;
- party to a transaction or contract makes unreasonable/unsupported objections to due diligence or representations or warranties being included in the agreement;
- party does not reside or have a significant business presence in the country where the service is to be provided;
- use of a shell company or some other non-transparent corporate structure;
- use of nominees or proxies with no obvious commercial purpose;
- use of entities with names mirroring more reputable entities with no connections to those reputable entities;
- use of unauthorised communication channels, such as personal email, to engage in, or undertake work-related matters;
- requests for payment of a commission or a significant portion thereof, before, or immediately upon award of the contract;
- requests for payment in cash, advance payments, payment to an individual or entity that is not the contracting individual/entity, or payment into a country that is not the contracting individual/entity's principal place of business or the country where the services are performed;
- high-value and or complex deals or transactions that intentionally bypass or exclude the involvement of Risk and/or Compliance in the review processes;
- unauthorised alteration of accounting documentation.