

# CDC's Commitment to Anti-Bribery and Corruption

*November 2018*



## **CDC's Commitment to Anti-Bribery and Corruption**

Business integrity is a core aspect of CDC's mission and informs all our operations and decision-making. CDC takes a 'zero-tolerance' approach toward bribery and corruption and our commitment to business integrity is enshrined in our Code of Responsible Investing. We comply with all applicable laws, both in the UK and the jurisdictions where we invest, and believe our efforts to identify and mitigate integrity risks help ensure the success and sustainability of our investment strategy.

CDC has detailed business integrity and compliance policies and procedures that are informed by the key principles of the UK Bribery Act 2010. These aim to ensure that all staff members follow the company's commitment to integrity and legal compliance. This includes conducting appropriate risk assessments at all stages of the investment cycle and thorough due diligence on all investments to avoid associating with individuals or entities against whom credible allegations of corruption have been made.

All CDC staff members also receive training on anti-bribery and corruption on an annual basis to enable them to recognise and report integrity risks and help protect CDC from such risks.

CDC staff, agents and third parties acting on CDC's behalf will not offer, promise or give any advantage to any individual to induce an improper function or action; will not reward any person for performing any improper function or action; and will not request, agree to receive or accept any bribe, facilitation or other forms of corrupt payments. Not only are such payments in violation of the law and CDC's investment code but are also wholly incompatible with CDC's mission to build businesses, create jobs and make a lasting difference to people's lives in developing countries.

CDC's commitment to integrity extends not only to CDC's own staff members, but is a requirement of the fund managers and portfolio companies to which CDC proposes to commit capital. A fund or portfolio company's commitment to integrity is one of the most important factors that CDC will evaluate when deciding whether to select that entity for a potential investment. CDC will take all reasonable steps to mitigate integrity risks, including by requiring investee companies and fund managers to strengthen their integrity controls in line with CDC's Code of Responsible Investing. CDC also continually monitors its portfolio and makes improvements where necessary to limit CDC's exposure to integrity risks stemming from bribery and corruption.



Investment works

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