

Financial Institution Name KBC BANK
Location: Brussels

If you answer "no" to any question, additional information can be supplied at the end of the questionnaire	Y	N
I. General Policies and Procedures:		
1. Is a formal anti-bribery programme approved by senior management?	Y	
2. Is a written anti-Bribery statement, including a zero-tolerance principle, approved by senior management and published?	Y	
3. Are the Entity's Policies & Procedures based on a preliminary Bribery Risk Assessment?	Y	
4. Has the Entity developed written policies documenting the processes to prevent, detect and report suspicious transactions?	Y	
5. Are the Entity's anti-bribery policies and practices in scope of the audit universe?	Y	
II. Internal Risk Assessment		
6. Are the policies and procedures applicable to all branches and subsidiaries, both in the home country and in locations outside of that jurisdiction?	Y	
7. Have policies covering gifts, entertainment, charitable & political contributions, sponsoring etc. been developed?	Y	
8. If yes, do the policies cover gifts, entertainment, charitable & political contributions, sponsoring and contain record retention and archiving procedures?	Y	
9. Do the Entity's Human Resources policies take provisions on corruption risk into consideration?	Y	
10. Are the controlling functions charged with developing and applying procedures for monitoring and review?	Y	
11. Have policies allowing the reporting of breaches and suspicions (whistle blowing policies) been developed?	Y	
III. External Risk Assessment: (Enhanced) Due Diligence		
12. Are there requirements in place to set up a risk-based assessment of third parties performing services to the Entity?	Y	
13. Does the Entity operate under requirements, imposed by law or company policy, to apply Know Your Customer procedures, including identification of Politically Exposed Persons (PEP's)?	Y	
14. Is the Entity required to set up Agents and Intermediaries Policies containing provisions on corruption risk?	Y	
15. Does the Entity have a requirement to set up Suppliers & Contractors Policies containing provisions on corruption risk?	Y	

IV. Training & Communication		
16. Does the Entity provide communication on anti-bribery developments?	Y	
17. Does the Entity provide anti-corruption risk-based training to relevant employees on bribery and corruption?	Y	
18. Does the Entity retain records of its training sessions including attendance records and relevant training materials used?	Y	
19. Does the Entity communicate new Bribery related laws or changes to existing policies or practices to relevant employees?	Y	

Space for additional information (please indicate for which question the information is provided):

Date	Set up on May 2, 2012 - reviewed and updated on March 3, 2014
Signature	Marie-France De Pover Senior Manager Group Compliance