You can find **the Anti-Corruption Policy Test on the page of e-training** [Anti-Corruption test 2018](https://smartzone.softline.com/mkc-portal/s/0yohK8) attached answer sheet for your reference. Once done, download the certificate and attach the copy.

1. **What are the consequences of corruption for the company?**

А. Damage of business reputation

B. Criminal proceedings against employees

C. It negatively affects the business

D. It contributes to attraction of clients and growth of profits

E. It does not affect the company's activities

Correct answers: А, B, C.

1. **What anti-corruption laws does Softline follow in its activities?**

А. Laws of the Russian Federation only

B. Laws of the country of operation and internal regulations only.

C. Laws of the country of operation, internal regulations, USA Foreign Corrupt Practices Act (FCPA) and others.

Correct answer: C

1. **An employee of Softline in charge of concluding of a government contract was offered by a government official to speed up the process of entering into such contract subject to payment by Softline of his/her vacation abroad. What actions should such employee take?**

А. Pretend that he/she does not understand what it is all about. Tell nobody about such incident, so that not to become a party to corruptive actions.

B. Answer that this issue is beyond his/her competence and recommend such government official to apply to Softline’s top management.

C. Offer payment for the government official’s vacation abroad from his/her private money, as concluding the contract may entail Softline’s punitive actions against such employee.

D. Apologize for not taking the offer and immediately inform top management of such proposal, as of the government official’s corrupt action.

E. Immediately inform top management and Legal Compliance Department of such proposal, as of the government official’s corruptive action.

Correct answer: E

1. **What actions can counterparties (including Microsoft) take to get the information on Softline’s non-compliance with anti-corruption laws?**

А. None. We are personally responsible for all our actions in the eyes of the law.

B. Inform Softline’s management on the possible corruptive actions of Softline’s employees and partners.

C. Carry out comprehensive anti-corruption audit and, where corruptive actions of Softline’s employees and/or partners revealed, terminate business relations.

D. Inform appropriate authorities on the violation of anti-corruption policies revealed upon results of comprehensive audit, as criminal prosecution or other enforcement measures, or file a claim for damages.

Correct answer: B, C, D

1. **What measures can be taken against Softline’s employees caught to be corrupt?**

А. Measures of financial punishment, like depriving of a bonus or cutting of a salary.

B. No special measures; top management takes decision on a case by case basis.

C. Cancellation of labor agreement.

D. Reporting to law enforcement bodies on the violation of anti-corruption laws.

Correct answer: C, D

**6. What are the consequences of the violation of anti-corruption laws?**

A. Anti-corruption laws envisage criminal liability.

B. Governmental authorities may impose sanction on Softline, and it may lose the right to conduct business.

C. Softline and its employee may be obliged to pay a huge fine.

D. Microsoft Corporation or any other counterparty may cancel the contract with Softline.

E. Softline reputation may be damaged and its clients may terminate their relationship with the company.

F. Civil claims may be filed against Softline and its employees.

Correct answer: А-F (all)

1. **Which of the following statements is true for a bribe?**

А. If an official does not do anything in return, any value transferred or promised to him/her is not a bribe.

B. No minimum amount is fixed for a bribe, so even small amount can be considered a bribe.

C. The bribe is expressed in money terms. Payment of travel and accommodation expenses or promise of hiring is not a bribe.

D. Softline policy prohibits bribes in any form, regardless of whether the recipient is a government official or a private person.

E. Even if you do not make improper payments yourself, you can be held liable for such payments made on your behalf, or for their ignoring.

F. Softline prohibits such actions as attempt to influence conclusion or prolongation of a contract, decrease of duties or fees, speed-up of deliveries and process of approval or authorization, as well as outcome of governmental authorities’ decisions.

Correct answer: B, D, E, F

1. **Which statement is correct for the government officials?**

А. Government officials are the employees of government institutions.

B. Private persons, acting on behalf of government institutions, are not government officials.

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| C. Government officials include, but not be limited to, the elected officials; private persons, acting on behalf of government institutions; managers and employees of companies owned or controlled by the state; candidates for public posts; employees of party apparatus.  D. Employees of international public organizations (for example, the World Bank) are not the government officials.  E. Government officials may also include: adviser of an official; employee of a party apparatus; employee of a company owned or controlled by the state; teacher employed by a municipal administration; private entity providing public services. |

Correct answer:

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| А, C, E  **9.** **The client entering into a transaction with Softline in respect of Microsoft products asks to pay for a trip to Microsoft office in the USA to participate in the information meeting. The client also asks to include a trip to Las Vegas to his/her route. How should Softline employee in charge of this transaction act?**  A. Pay for the whole trip, as it is planned for legitimate purpose.  B. Contact travel agency, asking them to pay the whole trip of such client, and then reimburse the agency for the expenses.  C. Pay for the client's trip to Microsoft office, but refuse to pay a trip to Las Vegas, since it is not related to the business purpose of the visit.  D. Tell the client that Softline is not entitled to pay travel expenses on behalf of Microsoft, and immediately inform both top management and Legal Compliance Department about this fact.  Correct answer: D.   1. **Softline’s employee in charge of entering into a contract finds out that its partner included paid services, which the counterparty provides on a free basis, to the contract with a client. What actions should such employee take?**   А. Do nothing, as the partner held negotiations with the Client, and the Client agreed to such terms.  B. Inform the partner about possible negative consequences in case of the counterparty’s check up.  C. Immediately inform top management and Legal Compliance Department of such fact, as of the possible corruptive actions of the Partner. | | |
| Correct answer: C  **11. The client is a government official. When negotiating a transaction, such government official tells that his/her son has recently graduated from a university and is looking for a job. He/she says he/she will be able to influence quantity of an order if Softline hires his/her son. What actions should such employee take?**  A. Tell the official that he/she will deal with this issue and ask to send son's curriculum vitae.  B. Tell the official that Softline cannot hire his/her son and immediately inform both top management and Legal Compliance Department about this fact.  C. Promise the official to hire his/her son, but only after the transaction is concluded and only if there are vacancies in Softline.  Correct answer: B | |
| **12. Softline is in competition with another company for the right to conclude a transaction with a government organization. A client declares that he/she wants to conclude it with Softline, but to succeed with such transaction it is necessary to "pay a little extra." What actions should be taken?**  A. Pay, as otherwise a competitor may enter into this transaction.  B. Ask to pay a subcontractor to ensure that the payment is not made by Softline.  C. This is a bribe request. It is necessary to refuse to pay and report the situation to top management and Legal Compliance Department.  D. Do nothing and tell nobody about this incident, so that not to become a party to corruptive actions.  Correct answer: C  **13. The client, who is a government official, informs Softline’s employee that, in view of his/her job duties, he/she is in charge of choosing counterparties to the transaction. At the same time, he/she will be absent from work, as he/she is going to complete an expensive medical treatment, and offers to pay for such treatment through a charitable foundation. What actions should be taken?**  А. Pay. As far as the donation is made through a charitable foundation, such actions are not corruptive.  B. Agree to pay, but only after successful conclusion of the transaction.  C. This is a bribe request. It is necessary to refuse to pay and report the situation to top management and Legal Compliance Department.  D. Do nothing and tell nobody about this incident, so that not to become a party to corruptive actions.  Correct answer: С |

**14. What actions should be taken when the information about possible corruptive actions or risk factors is obtained?**

А. Tell nobody, as this may entail punitive actions.

B. Tell nobody, as this may result in loss of Softline’s business.

C. Inform your management verbally, and they have to decide themselves how to proceed.

D. Inform Legal Compliance Department.

Correct answer: D

**15. What resources / contacts should be used to report on potential corruptive actions?**

А.  **Tel.:** +7 (495) 232-00-23 (\*0105)

B. **E-mail:** Legal Compliance ([compliance@softlinegroup.com](mailto:compliance@softlinegroup.com))

C. **Web-site:** <http://softlinegroup.com/>

D. **Postal address:** Chief Compliance Officer

Softline, Derbenevskaja emb. 7, building 9, Moscow, Russia, 115114

Correct answer: А-D (all).