



CHECKLIST FOR SELF-ASSESSMENT

Corporate Political Engagement Index

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The following checklists were designed by Transparency International UK as a practical tool for companies to help you manage the various aspects of political engagement covered in this guidance.

Political Donations and Indirect Political Expenditure

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
1. Is there a publicly available policy covering political contributions whether made directly or indirectly?							
2. Does the company have a procedure to implement its policy for political contributions?							
3. If political contributions are allowed, are controls implemented with thresholds for approval and counter-signatures?							
4. Does the policy for political contributions apply across all the company's entities including subsidiaries?							
5. If the policy is to prohibit political contributions, does this include not running a company PAC if the company operates in the US?							
6. Does the procedure for managing conflicts of interest cover personal political contributions by board members and senior employee which could conflict with their role in the company?							
7. Does the anti-bribery programme include controls to counter the risk of use of political contributions as subterfuges for bribery?							
8. Is there a procedure to record accurately in the books any political contributions or expenditures (even if there is a policy of prohibition, some may be made in breach of the policy)?							

Lobbying

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
9. Is there a publicly available policy and procedure covering responsible lobbying?							
10. Does the company publish details of the aims and significant topics of its public policy development and lobbying, and the activities carried out?							
11. Has a senior manager been appointed with overall authority for implementing the company's lobbying policy?							
12. Are lobbyists and others who carry out lobbying for the company required contractually to align to the company's policies for lobbying and anti-corruption?							
13. Is there a procedure for documentation of formal and informal meetings and contacts with politicians and officials?							
14. Does the company check that there are consistent standards of responsible lobbying across all the company's operations including subsidiaries?							
15. Has the company formally decided how it uses in-house consultants, consultant lobbyists and others who have responsibilities for aspects of political activities?							
16. Has the company assigned responsibilities for relationship management of consultant lobbyists?							
17. Does the company ensure there is a business case for appointment of consultant lobbyists?							

18. Is there a procedure to ensure fees and expenses are appropriate for the consultant lobbyists' activities and do							
19. Is there a procedure to carry out due diligence on consultant lobbyists before appointment or on reappointment?							
20. Is there a procedure for review and approval by management of appointment or reappointment of consultant lobbyists?							
21. Does the company maintain a register of lobbyists?							
22. Does the company implement a procedure to ensure that organisations contracted to lobby on the company's behalf comply with the company's policy for political lobbying?							
23 .Does the company ensure its lobbyists comply with lobbying laws and registers?							
24. Do contractual requirements include observing the policies and procedures for political activities with right to audit books and records and provision for termination in the event of breach of the contract?							
25. Are expenditures by lobbyists recorded in the books with clear statement of purpose and supported by documentation to provide an audit trail?							

Trade Associations and Business Chambers

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
26. Has a senior manager been made responsible for the company's trade association memberships and assigning responsibilities for managing the relationships?							
27. Is due diligence carried out on trade associations before taking out membership and periodically on renewal to check their governance, advocacy procedures and positions and that they are transparent including publishing source and disposal of funds for lobbying?							
28. Are there approval thresholds and counter signatures for new memberships or renewals?							
29. Does the company have a procedure to ensure it monitors and engages in shaping the lobbying activities of the associations of which it is a member?							
30. Does the company communicate publicly that a membership does not mean that the company endorses all the public policy positions of the trade association?							
31. Does the company communicate its responsible lobbying policy to its trade associations?							

Exchanges of People Between Business and the Public Sector

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
32. Is there a publicly available policy and procedure covering 'revolving doors', the movements of directors and employees between the company and the public sector?							
33. Does the company have a procedure for implementing a 'cooling-off period' for discussions on behalf of the company by current directors and employees recruited from public office or the public sector with their former organisation or department?							
34. Does the company have a procedure for implementing a 'cooling-off period' for discussions on behalf of the company by current directors and employees recruited from public office or the public sector with their former organisation or department?							
35. Is there a code of conduct for those joining from the public sector?							
36. Are the recruitment policies and procedures designed to ensure that no public official is induced to perform improperly in the prospect that there might be a Board appointment or employment with the company?							
37. Does the company have a cooling-off period for discussions on its business by board directors and employees appointed from the public sector?							
38. Does the company have a cooling-off period for discussions on its business with former employees hired by the public sector or appointed/elected to political office?							
39. Does the company report publicly on any movements between the company, politics and public service?							

40. Is there a policy and procedure for secondments to and from the public sector including short term work placements?							
41. Does the company have a policy and criteria for the appointment of parliamentarians to the board or use in consultancies whether directly with the company or indirectly through a lobbying consultant?							

Designing the Organisational Structure

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
60. Has the company assigned authority to a designated senior manager for ensuring that its political activities are carried out consistently?							
61. Is cross-functional working been built into the organisational structure?							
62. Are political activities coordinated with the function responsible for corporate responsibility?							
63. Are the policies for political activities applied group-wide, globally and consistently?							
64. Does the company require its contracted business associates to act in a manner consistent with the company's guiding principles, policies and procedures for political activities in the services they carry out on its behalf?							
65. Does the head office function responsible for political engagement activities ensure consistency in subsidiaries and local business units on its global advocacy positions and the handling of local public policy concerns and opportunities?							

Implementing Policies and Procedures

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
Stakeholder Engagement							
66. Does the company consult with stakeholders about its political engagement activities and expenditures?							
67. Has the company identified its stakeholders for consultation relevant to each of its key advocacy issues?							
68. Are the results of consultations used in designing the policies and procedures for political engagement activities?							
Anti-Bribery Programme							
69. Have the bribery risks related to political engagement activities been assessed through the risk assessment process?							
70. Has the anti-bribery programme been designed to address identified risks related to political engagement activities?							
71. Are the anti-bribery controls for political engagement activities implemented across the company's operations including consultants and other relevant third parties?							
Communications and Training							
72. Is tailored training given to employees and consultant lobbyists on the policies and procedures for responsible political engagement and the anti-bribery programme?							

73. Are tailored communications and training provided to consultant lobbyists including guidance on the company's policies related to risk areas such as gifts, hospitality and travel expenses?							
74. Are employees and contracted parties advised of the consequences if they act improperly or negligently?							
75. Is guidance given on issues and risks that may be encountered?							
Raising Concerns and Seeking Advice							
76. Is a whistleblowing channel provided for employees and third parties?							
77. Is an advice line provided for employees and third parties?							
78. Are whistleblowing /advice lines provided in the main local languages?							
Internal Controls							
79. Do the internal financial and accounting controls allow monitoring of policies and procedures to check that they are followed, that procedures are effective, and that control objectives for responsible political activities are met and continuous improvement can take place?							
80. Is there a policy and procedure requiring political contributions and expenditures on political activities to be approved by appointed managers against designated thresholds of approval?							

81. Do the internal control procedures provide for checks and balances in the approval of payments, maintaining accurate books and records available for inspection and audits and ensuring an audit trail for transactions?							
82. Are the policies and procedures for gifts, hospitality and travel expenses applied to lobbying?							
83. Is there a procedure to record transactions for political activities accurately in the books including any political contributions (if the company prohibits donations, these include payments made inadvertently in breach of the policy)?							
84. Do internal audits support the internal controls system for political activities?							

Monitoring and Evaluation

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
85. Does the company have a procedure to monitor and review its political engagement activities regularly?							
86. Are the results of monitoring reviewed by senior management?							
87. Does the board receive regular reports from management on the implementation of political engagement activities?							
88. Are breaches of policy reported to senior management and the board?							

Transparency and Public Reporting

Indicator	Y	N	Unclear	In Plan?	Plan Date	Comment	Ref No:
89. Does the company publish full information on its approach for political engagement and the topics on which it engages?							
90. Is the information on the company's political engagement activities provided in an accessible way such as sustainability reports and publications in local languages?							
91. Does the company report on its political engagement activities using a dedicated web page?							
92. Does the company publish up-to-date details of all political contributions made by the company and its subsidiaries or a statement that it has made none?							
93. Does the company report publicly on its lobbying activities, key issues lobbied on, activities and expenditures?							
94. Does the company report on its participation in registers of lobbyists?							
95. Does the company publish full details of its global lobbying expenditure?							
96. Does the company publish a list of organisations of which it is a member that lobby on topics relevant to the company?							
97. Does the company publish full details of fees and payments to organisations of which it is a member that lobby on topics relevant to the company?							

98. Does the company report publicly details of the movements in either direction of senior people from the public sector to the company?							
99. Does the company report on details of the contracted services of serving politicians acting as consultants to the company including details of the fees?							
100. Does the company publish details of secondments to or from the public sector?							
101. Does the company report publicly details of its policies for political activities in the workplace?							
102. Does the company report on the measures it takes to counter risks of corruption in political activities?							