

# AXA Mansard Anti-Bribery Policy



AXA MANSARD

AMIPLC/CQA/ABP/04/2017/V1.1

One of AXA Mansard's core values is integrity in business. In support of this principle, AXA Mansard has developed this policy for countering bribery.

## **1. Aims**

The aim of this policy is to:

- Set out AXA Mansard's business practice for countering corruption and bribery;
- Give guidance to staff members.

The benefits of rejecting bribery include:

- Positive for AXA Mansard's profile and reputation, and subsequently its business;
- Implications in acts of bribery are likely to result in negative media coverage and possible legal action, which would obviously be detrimental to the company's business.

## **2. Anti-bribery commitments**

AXA Mansard is committed to:

- conducting its business fairly, honestly and transparently;
- not making or offering bribes, whether directly or indirectly, to gain business advantages;
- not accepting bribes, whether directly or indirectly, to give business advantages;
- a zero tolerance towards bribery; and
- developing a policy to implement and support these principles and comply with international best practice

## **3. Anti-bribery policies and procedures**

### Gifts and entertainment policy

Gifts are presents such as flowers, confectionary or wine. Tickets to sports and cultural events which are given to an individual and not used in a hosted business context are also gifts. This also includes gift vouchers or shopping cards.

Hospitality includes entertaining, meals, receptions, tickets to entertainment, social or sports events, participation in sporting events, such activities being given or received to initiate or develop relationships with business people or other third parties. Hospitality requires the host to be present, if not, the expenditure is a gift

**All** gifts and hospitality must be reported to the Compliance Officer(s) and will be entered in the Gifts and Hospitality Register. Gifts received with a value below N60, 000 can be retained by the recipients. All gifts received in excess of N60, 000 will be warehoused by the Company to be given out as gifts to award recipients or balloted to staff.

Gifts and hospitality to Foreign Public Officials are prohibited in all circumstances.

If you have any doubts about the propriety of giving or receiving a particular gift or hospitality you must consult the Compliance Officer.

#### Facilitations payments policy

Facilitation payment are small payments made to secure or speed up routine actions, usually by public officials, such as issuing permits, immigration controls, providing services or releasing goods held in customs. The facilitation payment is typically demanded by low level and low income officials to obtain levels of service normally available.

AXA Mansard prohibits 'facilitation' or 'grease' payments as these are bribes and illegal and will actively fight it when we meet it. It is also our policy that we work to ensure that our agents/consultants and other intermediaries do not make facilitation payments on our behalf.

Staff members paying facilitation payments will not be able to claim reimbursement.

If you have doubts about a payment and suspect that it might be considered a facilitation payment, question the legitimacy of the demand and resist it, only making the payment if the official or third party can provide a formal receipt or written confirmation of its legality. If the demander refuses, ask to speak to his senior officer and inform him that the payment may subject you to prosecution. If practicable, obtain senior management approval for the payment or consult the Compliance Officer. If the demand is accompanied by immediate threat of physical harm then put safety first, make the payment and report immediately to senior management and the Compliance Officer the circumstances and amount of the payment.

All payments made and resisted must be reported to the Compliance Officer(s) and management

You can continue to pay for legally required administration fees or fast-track services as these are not facilitation payments, but a receipt should be obtained.

#### Political contributions by AXA Mansard

A political contribution is a contribution, financial or in kind, to support a political cause. Financial contributions can include both donations and loans. In-kind contributions can include gifts or loans of property, provision of services, advertising or promotional activities endorsing a political party, purchase of tickets to fundraising events and contributions to research organizations or 'think-tanks' with close associations to a political party.

Our policy is not to make political contributions in any form whether to political parties, causes or to support individual candidates. This does not cover personal political contributions made by AXA Mansard partners/employees, providing the contributions are not intended to retain or

secure a business advantage for AXA Mansard.

#### Charitable donations by AXA Mansard

Community support and donations are acceptable, be it in-kind services, knowledge, services exchange, or direct financial contributions. A senior management officer must approve any charitable donation. Senior Management will ensure through due diligence and transparency that charitable contributions are not used as a subterfuge for and do not constitute bribery.

AXA Mansard will maintain records of all charitable donations made by the company.

This does not cover personal charitable donations made by AXA Mansard partners/employees, providing the donations are not intended to retain or secure a business advantage for AXA Mansard.

#### Protection money

In some parts of the world 'protection' is offered. This is a form of extortion which may involve physical threats.

AXA Mansard will not pay protection money. However, we have an obligation to our staff and consultants. If the demand is accompanied by immediate threat of physical harm then put safety first, make the payment and report immediately to senior management and the Compliance Officer the circumstances and amount of the payment. In certain situations this may lead to a cessation of business.

#### Expenses policy

Procedures are in place for reviews of all expense claims, which must be signed by the claimant and approved by a Group head or senior officer. Receipts and records are kept of all expenses claimed and these are monitored to ensure their purpose and amounts are legitimate. These are verified by SYSCON and FINCON.

### **4. Implementation**

#### Roles and Responsibilities

It is every staff member's responsibility to counter bribery in AXA Mansard by adhering to this policy.

It is the responsibility of management to communicate this policy and ensure that all staff members and external parties working on behalf of AXA Mansard, within their area of responsibility, understand and comply with the aims and procedures.

Section 3 of this policy, above, establishes the minimum requirements with respect to gifts and hospitality, facilitation payments, charitable donations and political contributions.

Faced with a demand for a facilitation payment, excessive gifts or hospitality, the following steps must be taken by the person faced with the demand:

1. Actively resist the payment, gift or hospitality;
2. Inform your manager or the Compliance Officer, if possible, before making any payment;
3. Keep any amount to a minimum;
4. Create a record concerning the payment and notify the Compliance Officer.

### Business Relationships

AXA Mansard needs not only to implement its policy to entities over which it has effective control but should also communicate its policy to its business partners, agents, consultants and portfolio companies

#### **Business partners/ agents/ consultants/ intermediaries**

AXA Mansard will act with due care before engaging with a business partner/agent/consultant/intermediary and ensure that these entities/individuals know and respect our policy for countering bribery.

Compensation paid to business partners/agents/consultants/intermediaries must be appropriate and justifiable remuneration for legitimate services rendered. The relationship must be documented. We reserve the right to termination in the event that the entity/individual pays or solicits bribes or in any other way violate this policy or the law. All Business partners/ agents/ consultants and intermediaries will sign that they will abide by our policy (see Appendix III)

#### **Suppliers of services**

AXA Mansard will send a letter to all key suppliers asking them to ensure they have adequate anti-bribery policies in place and request that they sign that they will abide by our policy. (See Appendix II)

### Communication and Training

AXA Mansard will ensure that all its staff members are informed about and understand this policy. All relevant staff members will receive relevant training and new staff will be briefed.

Training will cover implementation of AXA Mansard’s policies and procedures, the consequences of failing to follow these requirements, how to respond to bribe requests and how to report potential violations.

Sanctions

Failure to observe this policy is a cause for disciplinary action and eventual dismissal.

No member of staff will be penalized or be subject to other adverse consequences for refusing to pay bribes even if it may result in AXA Mansard losing business.

All members of staff must sign an annual anti-bribery undertaking (see Appendix I).

Monitoring

Risk assessment and review of policies and procedures including approval by the Group heads will take place annually as well as when the firm’s operations change.

Monitoring is the responsibility of all the Divisional Directors/Group heads in conjunction with the Compliance Officer.

**Examples of bribes**

- Promising or offering payments to a foreign public official in order to ensure the signature of a contract;
- Accepting an expensive gift from an agent for not performing due diligence;
- A donation to a charity associated with a client;
- Accepting a luxury holiday to the Caribbean from a service provider/supplier/broker

**Approval**

1. Compliance and Quality Assurance Unit .....
2. Chief Client Officer .....

## **APPENDIX I Staff undertaking**

### **AXA Mansard Anti-bribery policy**

I hereby confirm that I have received, read and understood AXA Mansard's anti-bribery policy ("the Policy") as set out above.

I undertake to comply with the Policy (and any additions, amendments or replacement which may be made from time to time), the UK Bribery Act 2010 and local anti-bribery laws throughout my period of employment at AXA Mansard.

I understand that any violation or breach of the Policy will terminate my contract of employment with immediate effect.

Signed: .....

Print Name: .....

Date: .....

## **APPENDIX II Supplier of services**

### **AXA Mansard Anti- bribery policy**

Company name: .....

Officer name: .....

I hereby confirm that I have received, read and understood AXA Mansard's anti-bribery policy ("the Policy") as set out above.

The organization named above undertakes to comply with Policy (and any additions, amendments or replacement which may be made from time to time), the UK Bribery Act 2010 and local anti-bribery laws in connection with the provision of services throughout our contract with AXA Mansard.

I understand that any violation or breach of the Policy will terminate my contract for services with AXA Mansard with immediate effect.

Signed: .....

Print Name: .....

Date: .....

**Please return by fax/email and courier to AXA Mansard's Compliance Officer(s) by [date]:**

**AXA Mansard Insurance Plc.  
Santa Clara Court,  
Plot 1412, Ahmadu Bello way  
Victoria Island**

**(T): 01-4485482,**

**(F): 01-4613284**

**(W): [www.axamansard.com](http://www.axamansard.com)**

**(E): [Compliance&QualityAssuranceUnit@axamansard.com](mailto:Compliance&QualityAssuranceUnit@axamansard.com)**





### **APPENDIX III Agent undertaking**

I hereby confirm that I have received, read and understood AXA Mansard's anti-bribery policy ("the Policy") as set out above.

I undertake to comply with the Policy (and any additions, amendments or replacement which may be made from time to time), the UK Bribery Act 2010 and local anti-bribery laws in connection with the provision of services to and throughout my contract with AXA Mansard.

I understand that any violation or breach of the Policy will terminate my contract for services with AXA Mansard with immediate effect.

Signed: .....

Print Name: .....

Position: .....

Date: .....

**Please return by fax/email and courier to AXA Mansard's Compliance Officer(s) by [date]:**

**AXA Mansard Insurance Plc.  
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