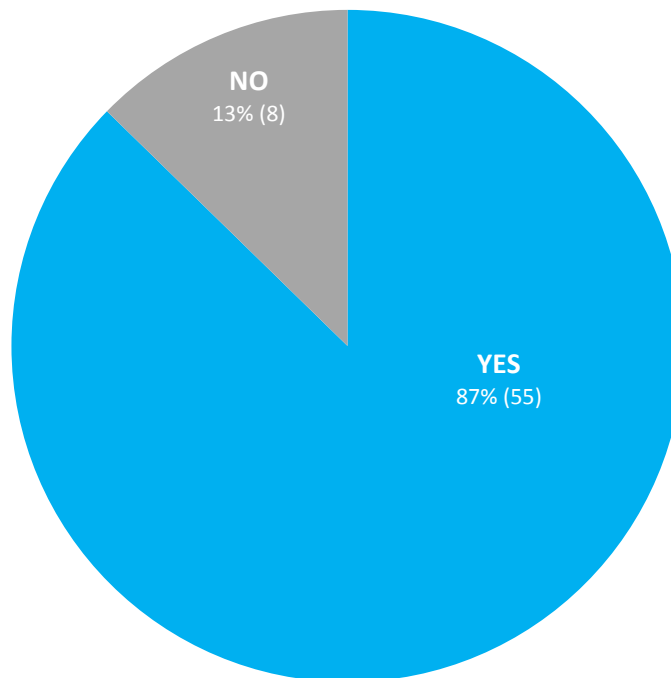


TRACE Benchmarking Survey: Monitoring High Risk Intermediaries

Below are the results of the Monitoring High Risk Intermediaries benchmarking survey. In total, respondents representing 63 TRACE Corporate Member companies participated in our online survey between May 18 and May 27, 2015.

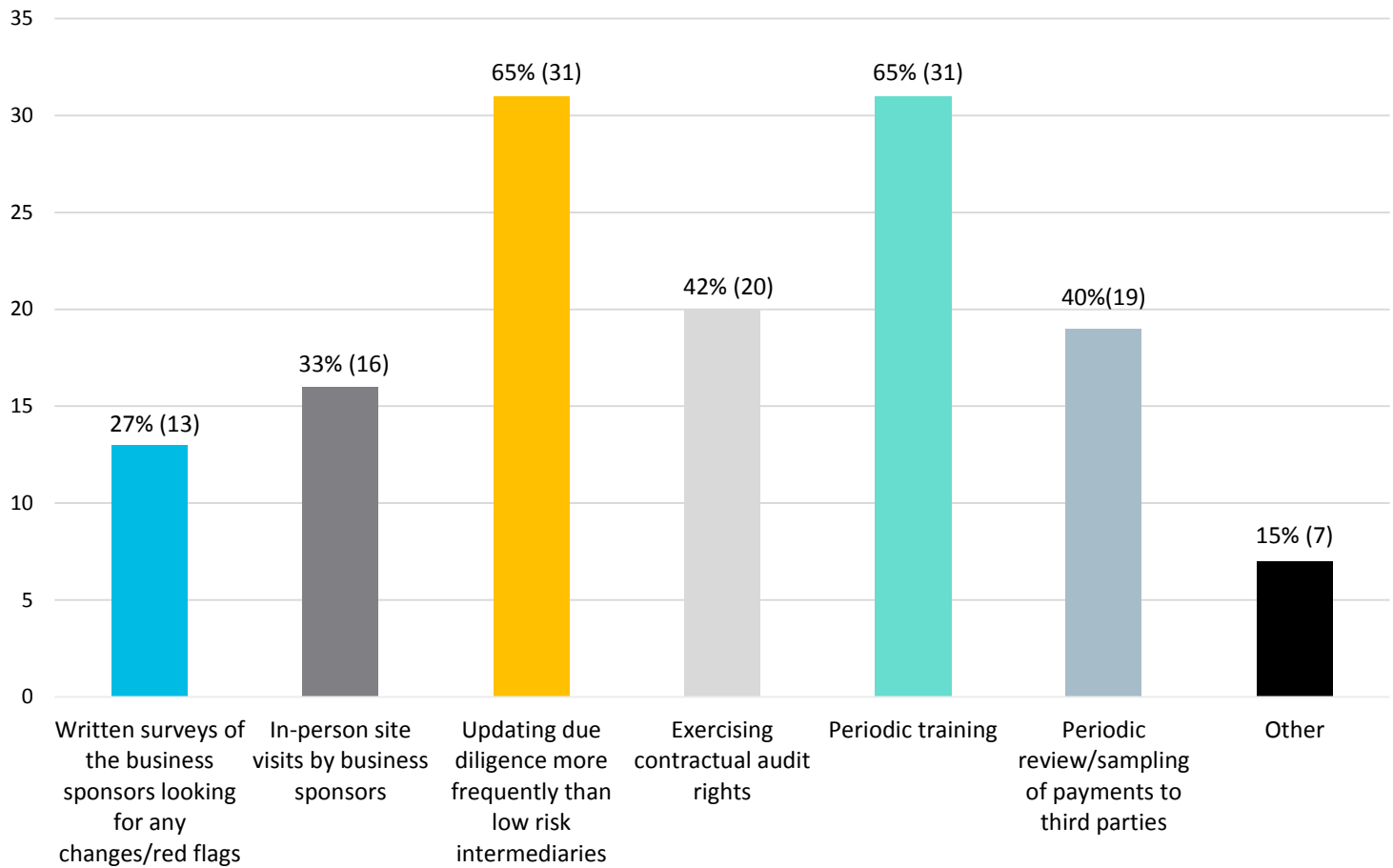
Question 1:

Is your company monitoring high risk intermediaries?



Question 2:

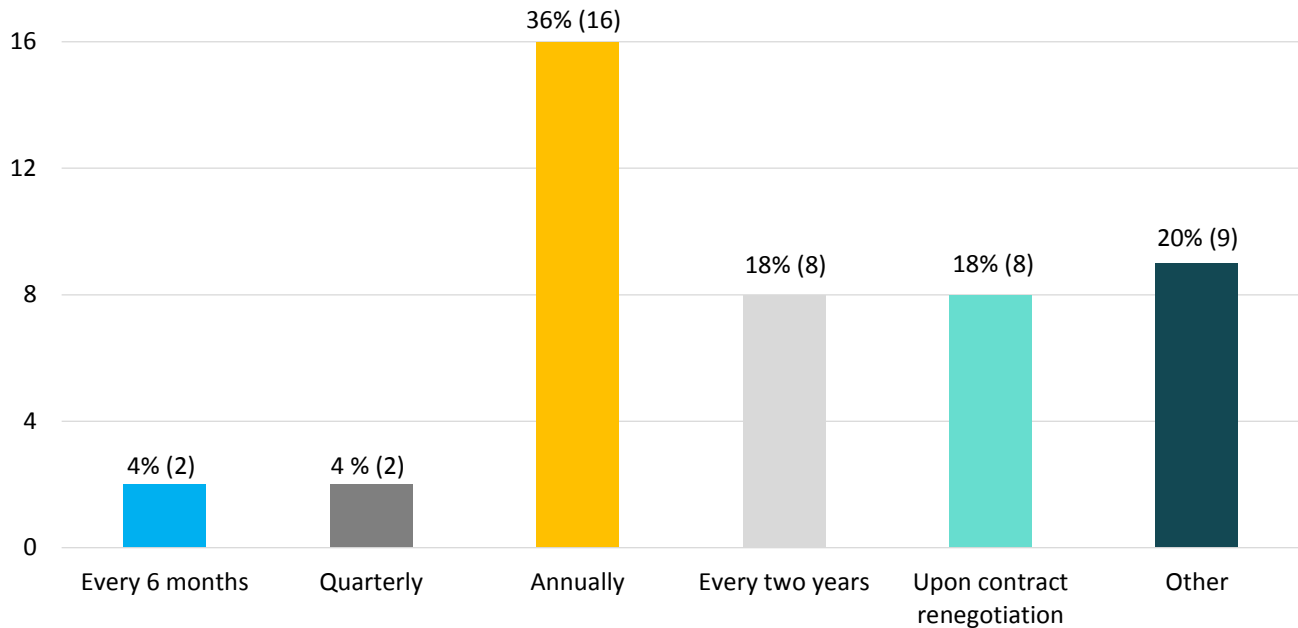
What type of monitoring is your company doing for high risk intermediaries?
(Select all that apply)



Other Responses
Periodic compliance certifications
Audit rights only exercised if red flags appear
Bring high risk intermediaries to company HQ periodically for training and anti-bribery conversations
TRAC & TRACE PILOT
In some cases, additional diligence
In-person visits by compliance staff
TRACE's Sanction List Monitoring

Question 3:

At what frequency is the monitoring of high risk intermediary being conducted?



Other Responses	
Visits on an ad hoc basis, updating due diligence prior to each commission payment	1
According to risk matrix	1
Constantly. We subscribe to a system that continuously monitor them.	1
Varies depending on the intermediary and the type of monitoring	3
Depends on the relationship - up to every 5 years	1
Not sure yet	1
Ad hoc	1