

# The C<sup>2</sup> Principles

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**The following principles are offered to all firms, wherever situated and whatever their lines of business. In addition, the principles are applicable to all business activities of the endorsing firms.**

**A corporation endorsing the C2 Principles pledges:**

- 1.** To disclose publicly and make widely known its endorsement of the C2 Principles.
- 2.** To establish a clearly articulated written policy prohibiting any of the firm's employees from paying or receiving bribes or "kickbacks."
- 3.** To implement the policy with due care and take appropriate disciplinary action against any employee discovered to have made payments in violation of the policy.
- 4.** To provide training for employees to carry out the policy, and to provide continuing support, such as help lines, to assist employees to act in compliance with the firm's policy.
- 5.** To record all transactions fully and fairly, in accordance with clearly stated record-keeping procedures and accounting controls, and conduct internal audits to assure no improper payments are made.
- 6.** To report annually on the firm's bribery and corruption policy, along with a description of the firm's experiences implementing and enforcing the policy.
- 7.** To have the annual report in principle six audited either by an independent financial auditor or an independent social auditor, or both.
- 8.** To require all agents of the firm to affirm that they have neither made nor will make any improper payments in any business venture or contract to which the firm is a party.
- 9.** To require all suppliers of the firm to affirm that they have neither made nor will make any improper payments in any business venture or contract to which the firm is a party.
- 10.** To establish a monitoring and auditing system to detect any improper payments made by the firm's employees and agents.
- 11.** To report publicly any solicitations for payments, or report privately to a monitoring organization or a social auditor.
- 12.** To establish a system to allow any employee or agent of the firm to report any improper payment without fear of retribution for their disclosures.