



# NSE Anti-Bribery and Corruption

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# 1 Introduction

## 1.1 Glossary & Definitions

Acronym	Definition
Deloitte NSE	Collectively, Deloitte NSE LLP and the Deloitte NSE affiliates (as defined below)
Deloitte NSE affiliates	The combining firms of Deloitte NSE LLP, being the local Deloitte firms in Belgium, Denmark, Finland, Greece, Iceland, Ireland, Italy, Malta, the Middle East, the Netherlands, Norway, Sweden, Switzerland & the UK, or subsidiaries incorporated or operating in these jurisdictions
DTTL	Deloitte Touche Tohmatsu Limited
NSE affiliate	Refers to a local Deloitte affiliate firm within Deloitte NSE
Partners	Equity Partners and Non-Equity Partners of Deloitte NSE
RRL	Reputation & Risk Leader
Staff	Persons excluding Partners, wherever located, employed by or working on behalf of Deloitte NSE, whether directly with the relevant Deloitte NSE entity or through a company or agency. This includes secondees, contractors and any person engaged in work for Deloitte NSE on a full-time, part-time, casual, contract or volunteer basis. This does not include third party service providers acting for Deloitte NSE including law firms.

## 1.2 Introduction

Deloitte NSE supports the fight against financial crime in all its forms and is committed to compliance with all applicable laws. This includes a commitment to conduct business in a manner that complies with applicable anti-bribery and corruption laws, and to refrain from activities that could violate, or cause any person to violate, such laws. We are committed to working in an ethical, lawful, and professional manner, as set forth in the DTTL Policies Manual, the [Deloitte Global Principles of Business Conduct](#), and the [Deloitte Responsible Business Practices Framework](#). This aligns to Deloitte's values, purpose, and public interest commitment.

### 1.3 Principles and Approach

This NSE Anti-Bribery and Corruption (the “Policy”) sets out Deloitte NSE’s approach in relation to anti-bribery and corruption. This Policy is consistent with good commercial practices and the expectations of relevant regulators and law enforcement authorities. This Policy should be read in conjunction with DPM 1550, DPM 1551, DPM 1552, DPM 1560, the NSE Entertainment & Gifts Policy and the FAQs for NSE Anti-Bribery and Corruption.

Deloitte NSE conducts business activities in accordance with the principles set out below:

- We are against corruption in any form and stand firmly against bribery in order to contribute to good governance, economic development, and the improvement of social welfare wherever we do business.
- We are committed to working in an ethical, lawful, and professional manner as stated in the Global Principles of Business Conduct, professional standards and law.
- We neither pay bribes nor accept them, nor induce or permit any other party to make or receive bribes on our behalf.
- We support efforts to eradicate corruption and financial crime.

### 1.4 Scope

Deloitte NSE LLP is incorporated in the UK and is therefore subject to the UK Bribery Act 2010 (the “Bribery Act”), the UK’s primary legislation covering offences related to bribery. It covers both the public and private sectors and is recognised as being one of the most stringent Anti-Corruption legal frameworks in the world.

For the avoidance of doubt, all of Deloitte NSE’s activities are to be treated as if they fall within scope of the Bribery Act. Deloitte NSE will comply with the Bribery Act at all times.

Firms carrying out business with or on behalf of Deloitte NSE's affiliates under an inter-firm agreement should also be treated as if they fall within scope of the Bribery Act in relation to that business.

Deloitte NSE will, and is obliged to, comply with current legislation that is applicable in different jurisdictions from time to time. These include affiliates’ local laws, as set out in Appendix A, the US Foreign Corrupt Practices Act (FCPA) and other laws which may apply to anything that is either i) referred from another Firm or ii) relates to an entity domiciled or headquartered in another country.

## 1.5 Target Audience

This Policy applies to all Partners and Staff, wherever located, employed by or working on behalf of Deloitte NSE, whether directly with the relevant Deloitte NSE entity or through a company or agency. This includes secondees, contractors and any person engaged in work for Deloitte NSE on a full-time, part-time, casual, contract or volunteer basis.

## 1.6 Leadership Commitment

This Policy is supported by the Deloitte NSE's Risk and Reputation Leader (RRL) as well as the NSE Financial Crime Leader. Responsibility for supervising this Policy and any procedures is delegated to Deloitte NSE's Anti-Corruption Pillar Lead with support from local Anti-Corruption Leaders and teams.

## 2 Details of the Anti-Bribery and Corruption Policy

### 2.1 Overview

The Deloitte NSE **Anti-Bribery policy** is set out below:

- Deloitte NSE, its Partners and Staff will neither offer, promise, pay nor accept bribes, nor induce or allow any other party to make or receive them on their behalf.
- Deloitte NSE, its Partners and Staff will not encourage or permit persons associated with it to offer, promise, pay or receive bribes (whether directly or indirectly) in relation to a contract to supply Deloitte.
- Deloitte NSE, its Partners and Staff will report any incidents of bribery as required by relevant policies and procedures and by law.

### 2.2 Key Policy Areas

Bribery or corruption can occur when there is reason to believe, or a reasonable and informed third party would likely conclude, that there may be intent to improperly influence business decisions or impair objectivity. Therefore, the following policies are established:

- *Political Donations* – Any form of payment to or financing of, or non-monetary donation to, political parties or individual politicians is prohibited.
- *Charitable Donations* – promising, giving, or soliciting charitable donations or engaging in charitable sponsorships as a subterfuge for bribery is prohibited.

Deloitte NSE must not be placed in a position of making donations with the intent of bribery or as a concealed form of corruption.

Donations must not be made for the purpose of enhancing the relationship between the firm and the third party requesting the donation.

- *Gifts, Entertainment and Hospitality* – offering or accepting gifts, entertainment, or hospitality as a subterfuge for bribery is prohibited. Any gift, hospitality or entertainment and travel expense must, therefore, be executed and managed in accordance with the local laws outlined in the local Anti-Corruption Policies and guidance. The NSE Entertainment and Gifts Policy has been established to provide further information on this topic.

In addition to entertainment and gifts involving Deloitte Partners and Staff, immediate or close family member are advised not to accept an offer, or not to make an offer of gift, entertainment or hospitality to Deloitte NSE clients or to other third parties that we have reason to believe, or a



reasonable and informed third party would likely conclude, is made with the intent to improperly influence business decisions or impair objectivity.

- *Facilitation Payments* – (e.g. payments of money or goods to a government official to facilitate a routine action to which there is already entitlement) constitute a bribe under the Bribery Act and are strictly forbidden. Partners and staff should be especially vigilant when travelling to certain jurisdictions which are high risk for bribery and corruption, and where facilitation payments may be culturally acceptable.
- *Hiring Practices and Referrals for Recruitment* – attempting to obtain or retain business or to secure an improper advantage of any kind by the act of offering or providing any recruitment opportunities (including temporary employment, contracting, work experience or an internship) to any candidate is prohibited. Referrals should not be provided preferential treatment.

Deloitte NSE manages the selection process of referred candidates through the implementation of referral integrity processes managed within each affiliate. When referring candidates, the referrer must provide complete and accurate information and failure to provide requested information or support other elements of the hiring process, may preclude a referral from proceeding through the hiring process. All attempts to circumvent, interfere with or unduly influence the hiring process are strictly prohibited.

- *Third party relationships* – Third party suppliers and contractors must be selected through a fair, honest and transparent process. There should be no attempts to obtain or retain business or secure an improper advantage by of any kind by the act of engaging with a supplier or other third party. As relevant, third parties will be subject to Deloitte NSE affiliates local Anti-Corruption due diligence procedures.

All Deloitte NSE's Partners and Staff must comply with these policies and failure to do so is considered a serious matter which may result in all or any of the consequences referred to in section 2.5 of this document.

## 2.3 Procedures

To embed appropriate knowledge and understanding of relevant Anti-Bribery and Corruption legislation, Deloitte NSE requires that all Partners and Staff participate in an Anti-Corruption training program.

Each Deloitte NSE affiliate has in place additional policies, procedures and guidance to support the matters raised in this document according to local laws. Partners and Staff need to be aware of their responsibilities at local level and should consult their local Anti-Bribery/Anti-Corruption intranet sites for further information.

## 2.4 Reporting

In all of the following situations, the local Anti-Corruption Leader (details of whom are on local intranet sites) must be contacted for advice as soon as reasonably practicable:

- Any situation where a Partner or Staff is asked to pay a bribe (including facilitation payments) or receive a bribe.
- If it is suspected or known that any third party has bribed or attempted to bribe another person (including with facilitation payments) during the conduct of the Deloitte NSE's business.
- Any other situation where a Partner or Staff becomes aware of bribery or corruption during the conduct of Deloitte NSE's business.

In turn, the local Anti-Corruption Leader must notify the NSE Anti-Corruption Pillar Lead.

This does not preclude Partners, Staff or anyone from using other available reporting channels (such as the [Speak Up](https://deloittepeakup.ethicspoint.com) Line (Deloittepeakup.ethicspoint.com) and/or the Ethics Office) and others to report in a confidential manner and without risk of retaliation.

All reporting should be undertaken in a manner consistent with privacy and confidentiality laws applicable to the NSE affiliate and individuals will not suffer adverse consequences for refusing to engage in conduct that would violate this Policy or for any reporting done in good faith of potential corruption violations by others.

The [NSE Ethics Code](#) includes a commitment to non-retaliation towards anybody who reports a valid concern in good faith and without malicious intent.

The safety of Deloitte NSE's personnel is paramount. Thus, if any Partner or Staff believes that a failure to pay a bribe (including facilitation payments) may cause jeopardy to their personal security or liberty, or that of others, then the payment can be made. However, all of the circumstances of the threat and the payment must promptly be reported to the local Anti-Corruption Leader. Such payments should not be claimed in expenses without consultation, however small or insignificant.

## 2.5 Regulatory Reporting Requirements

Each NSE affiliate is responsible for implementing a system of internal controls, to facilitate the documentation, maintenance and reporting of Anti-Bribery and Corruption compliance to applicable regulatory authorities and provide such documentation to competent authorities upon request.

## 2.6 Consequences of Violations or Breaches

Deloitte has a zero-tolerance approach to bribery. In accordance with this approach, any identified or suspected failure to comply with this Policy will be fully investigated.

Breach of the principles laid out in this Policy or Anti-Bribery and Corruption laws and local regulations may result in any or all of the following:

- *Criminal penalties* – against Deloitte NSE, or its affiliates, Partners or Staff including fines and imprisonment.
- *Civil actions* – including action by clients, regulators, or professional bodies, being taken against Deloitte NSE, its affiliates, Partners or Staff. In addition, debarment from public sector work may also result.
- *Disciplinary Action* – subject to Deloitte NSE and NSE affiliate disciplinary procedures and consequences including possible dismissal

## 3 Appendix

This Appendix provides an overview of primary Anti-Bribery and Corruption laws in the geographies of all of the NSE affiliates as of 30 May 2022. This lists primary anti-bribery and corruption laws within affiliate countries only. Deloitte NSE continues to abide by all other applicable legislation related to bribery, corruption, money laundering and other offences, as may be required from time to time.

### 3.1 NSE Geography Legislation table

Geography	Legislation
Bahrain	<a href="#">Penal Code No 15/1976 and Civil Service Bureau 2010</a>
Belgium	<a href="#">Wet van 10 februari 1999 betreffende de bestraffing van corruptie/ Loi relative à la répression de la corruption</a> <a href="#">Wet van 11 mei 2007 tot aanpassing van de wetgeving inzake de bestrijding van omkoping/ Loi adaptant la législation en matière de la lutte contre la corruption</a>
Cyprus	<a href="#">Prevention of Corruption Law – Chapter 161</a>
Denmark	<a href="#">The Criminal Law – § 122, 144 and 299 stk</a>
Egypt	<a href="#">Penal Code No 58/1937</a>
Finland	<a href="#">The Criminal Code of Finland (Chapter 36)</a>
Gibraltar	<a href="#">Crimes Act 2011</a>
Greece	<a href="#">Greek Criminal Code</a>
Guernsey	<a href="#">Prevention of Corruption (Bailiwick of Guernsey) Law, 2003</a>
Iceland	<a href="#">Almenn hegningarlog no 19/1940</a>
Iraq	<a href="#">Penal Code No 11/1969</a>
Ireland	<a href="#">Criminal Justice (Corruption Offences) Act 2018</a>

Isle of Man	<a href="#">Isle of Man Bribery Act 2013</a>
Italy	<a href="#">Criminal Code, Decree 231/2001</a>
Jersey	<a href="#">Corruption (Jersey) Law 2006</a>
Jordan	<a href="#">Penal Code No 16/1960</a> <a href="#">Anti-corruption Commission Law of 13 of 2016</a>
Kuwait	<a href="#">Law No 31/1970 amending certain Provisions or Penal code No 16/1960</a>
Lebanon	<a href="#">Legislative Decree No 340/1943</a> <a href="#">Law No 154/1999 on Illicit enrichment</a>
Libya	<a href="#">Penal Code No 48/1956</a>
Malta	<a href="#">Maltese Criminal Code - Chapter 9</a>
Netherlands	<a href="#">Wetboek van strafrecht</a>
Norway	<a href="#">Penal Code of 20 May 2005 No 28 (sections 387-389)</a>
Oman	<a href="#">Penal Code Royal Decree 7/2018</a>
Palestine	<a href="#">Penal Code Law No 16/1960</a>
Qatar	<a href="#">Penal Code Law No 11/2004</a>
Saudi Arabia	<a href="#">Anti-bribery Law Royal Decree No. M/36/1412</a>
Sweden	<a href="#">Swedish Penal Code 1962 (Chapter 10 Section 5a-5e)</a>
Switzerland	<a href="#">Swiss Criminal Code (Articles 322ter to 322decies)</a>
United Arab Emirates	<a href="#">Penal Code No 33/2022</a>

UK	<a href="#">The Bribery Act 2010</a>
Yemen	<a href="#">Penal Code Law No 12/1994</a> <a href="#">Anti-Corruption Law No. 39/2008</a>

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