

Assurance declaration on adequate application of Roche's Anti-Corruption Compliance Questionnaire for Business Partners

Business Partner:	Company name: Address: Key Contact Person(s): Relationship with Business Partner since:.....
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I. Selection/ Pre-contract Due Diligence

The due diligence process has to be appropriate to the specific circumstances of the case which has to be assessed.

a. Who is the Business Partner

Question	Yes	No	Comments
Are there independent references about the business partner available?			
Are the company's structure and the owners of the business partner known?			
Are the key contact persons who will work with Roche identified and known?			
Is a record of the due diligence performed by Roche on the business partner available?			

b. Type of work undertaken by a Business Partner

In order to properly evaluate the risk posed by a business partner, companies must take into account the type of work that a business partner will undertake.

Question	Yes	No	Comments
Higher risk business partner? - Will the business partner be engaged to deal directly with a public official? - Will the business partner be located or doing business in a country with high levels of bribery?			

c. Qualification/ Background

The initial stage in the vetting and retention of a business partner should be a methodical search for the most qualified business partner.

Question	Yes	No	Comments
Does the business partner have the qualification for the services to be provided?			
Were alternative candidates considered?			
Has a background check been conducted on the business partner?			

d. Political and economical risks

Question	Yes	No	Comments
Does the business partner have family or business ties to government officials or employees?			
Was the business partner recommended by a government official?			

e. Reputation

Question	Yes	No	Comments
Does the business partner have a reputation for ethical conduct?			
Is the business partner involved in any current corruption investigation and/or litigation?			
Was the business partner involved in any previous corruption investigation and/or litigation?			

f. Financials, banking information

Question	Yes	No	Comments
Is the amount of compensation consistent with the business partner's service(s)?			
Does the business partner request a commission or other payment above fair market value?			

g. General compliance questions

Question	Yes	No	comments
Are the selection and terms of engagement of the business partner approved by local senior management?			
Are business partners provided with information on Roche's			

anti-corruption commitment, its anti-corruption policies and expectations and informed about the consequences in case of violation of Roche's anti-corruption policies?			
Does the potential business partner have an effective compliance program in place, including but not limited to appropriate training of its employees?			

II. Contract/ Agreement

a. Signed contract

Question	Yes	No	comments
Are all agreements with business partners adequately documented?			
Do contracts with business partners include an integrity provisions?			

Assurance Declaration

I herewith confirm the following:

1. I have used the Anti-Corruption Compliance Questionnaire For Roche Business Partners to carefully evaluated the Company [NAME]
2. I will continuously monitor the business partner's activities and undertakings related to Roche's business thorough the duration of the agreement.
3. Risk based Compliance Evidencing (documentation Audit) is available.

Place: _____

Date: _____

Signature of responsible Line Manager:

First & Last Name