



IFIA

CIS COMPLIANCE PROGRAMME

CIS Commodity Inspection Services Compliance Principles & Programme



INDEX

SECTION A : CIS Compliance Principles

SECTION B : CIS Compliance Programme

CIS Commodity Inspection Services Compliance Principles & Programme



SECTION A : CIS Compliance Principles

1. Integrity

CIS Commodity Inspection Services is committed to operating in a professional, independent and impartial manner in all its activities.

CIS Commodity Inspection Services shall carry out its work honestly and shall not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, CIS Commodity Inspection Services shall ensure that such tolerances are not abused to alter the actual test findings.

CIS Commodity Inspection Services shall report data, test results and other material facts in good faith and shall not improperly change them, and shall only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

2. Conflicts of interest

CIS Commodity Inspection Services shall avoid conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services.

CIS Commodity Inspection Services shall avoid conflicts of interest between CIS Commodity Inspection Services' companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other.

CIS Commodity Inspection Services shall ensure that its employees avoid conflicts of interest with the activities of CIS Commodity Inspection Services.

3. Confidentiality

CIS Commodity Inspection Services shall treat all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

4. Anti-bribery

CIS Commodity Inspection Services shall prohibit the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment.

CIS Commodity Inspection Services shall prohibit the use of any routes or channels for provision of improper benefits to, or receipt of improper benefits from, customers, agents, contractors, suppliers, or employees of any such party, or government officials.

5. Fair marketing

CIS Commodity Inspection Services shall only present itself and conduct marketing, including any comparisons with or references to competitors or their services, in a manner that is truthful and not deceptive or misleading or likely to mislead.

SECTION B: CIS Compliance Programme

1.

Each member of the management of CIS Commodity Inspection Services confirmed its commitment to implementing this Code.

CIS Commodity Inspection Services published and adopted CIS Commodity Inspection Services' own Principles and the key elements of implementation (CIS Commodity Inspection Services' Compliance Programme) which:

- addresses all the IFIA Compliance Principles and Requirements for Implementation
- followed up the IFIA Guidelines as specified in paragraph 2 of the Introduction to these Guidelines
- has been applied throughout the whole of the organisation

2.

CIS Commodity Inspection Services appointed a Compliance committee and Compliance officer to oversee and manage the Programme

The Compliance Officer, has, irrespective of his other responsibilities, responsibility and authority for the co-ordination of the implementation of the Compliance Programme throughout the organisation. The Compliance Officer may nominate delegates to perform some or all of his functions within specified parts of the organization. Additionally, senior managers throughout the organisation have responsibility for implementation of the Programme in their areas of responsibility.

CIS Commodity Inspection Services established a Compliance Committee to carry out periodic reviews of the progress of the Compliance Programme and provide policy guidance. The Compliance Committee includes the Chief Executive Officer, the Compliance Officer and representation from the Management.

3.

CIS Commodity Inspection Services trains staff, ensures their continuing understanding of the Compliance Programme and consults them on its development

Prior to job offer, prospective employees will be informed of the Compliance Programme.

CIS Commodity Inspection Services ensures that:

- (a) each employee is provided with a copy of the Compliance Programme and requested to sign a declaration that it has been received, read and understood.
- (b) each Senior Manager, including at least one in respect of each Group Member within CIS Commodity Inspection Services' Group Membership (if any) as listed or referenced in the IFIA Members Directory, signed an annual declaration (see Section C) that the Programme has been implemented in his/her area of responsibility.

All employees, including managers, of CIS Commodity Inspection Services are required to undergo a Compliance Training Course. For the preparation of course material, CIS Commodity Inspection Services has referred to the IFIA Compliance Training Guide. A Record of course completion is be kept in each employee's file.

CIS Commodity Inspection Services employees have the opportunity to provide input on the development of the Programme.

CIS Commodity Inspection Services ensures that each employee has an on-going understanding of the Compliance Programme during employee performance evaluations.

CIS Commodity Inspection Services Programme makes it clear that employees will not suffer demotion, penalty or any other adverse consequences arising from strict implementation of the Programme even if it may result in a loss of business.

4.

CIS Commodity Inspection Services provides a help line for staff and encourages the reporting of violations on a confidential basis and free from reprisal except in malicious cases.

CIS Commodity Inspection employees through the help line may obtain guidance on any question or matter of concern relating to the implementation or interpretation of the Programme. At the employee's request, any such question will be dealt with confidentially and the anonymity of the employee is protected to the extent reasonably practicable.

5.

CIS Commodity Inspection Services publicly discloses its Compliance Principles and facilitate enquiries, complaints and feedback

6.

CIS Commodity Inspection Services investigates and records all reported violations and apply corrective and disciplinary measures.

CIS Commodity Inspection Services employees are encouraged to report details of violations or suspected violations either direct to the Compliance Officer, or to the employee's superior, senior management or an external auditor. The reporting employee will be fully protected against any form of reprisal unless she/he acted maliciously or in bad faith. If requested, the employee's anonymity will be protected to the extent reasonably practicable.

Employees are required to report any solicitation for, or offer of, an improper payment or advantage coming to their knowledge.

The Compliance Officer will initiate, where appropriate, an investigation into any violation of the Programme reported to him or coming to his knowledge.

7.

CIS Commodity Inspection Services protects the security of confidential business information

CIS Commodity Inspection Services implemented adequate security measures in its organisation's premises containing confidential business information to ensure that access is restricted to authorised personnel only and that documents/data are stored in designated secure areas and disposed of in a secure manner.

8.

CIS Commodity Inspection Services maintain accurate books and records which properly and fairly document all financial transactions

Off-the-books accounts are strictly prohibited.

9.

CIS Commodity Inspection Services ensured that its Compliance Programme is applied to the extent appropriate to its business partners

Such parties include:

- intermediaries (entities or individuals external to CIS Commodity Inspection Services who are required to promote the services of CIS Commodity Inspection Services as part of their responsibilities, including consultants and advisers)
- joint venture partners
- agents (entities or individuals external to CIS Commodity Inspection Services who are required to provide operational services, within the profession as defined in IFIA's Articles of Association, on CIS Commodity Inspection Services' behalf)
- subcontractors (entities or individuals performing outsourced activities within the profession under a contract with CIS Commodity Inspection Services)
- franchisees (entities or individuals external to CIS Commodity Inspection Services who carry on business within the Profession using CIS Commodity Inspection Services' trading name and/or brand, the rights to which are purchased from CIS Commodity Inspection Services under a franchise contract)

CIS Commodity Inspection Services does this this by at least:

- conducting due diligence before entering into or renewing any contract with the party. Due diligence includes a risk analysis, an interview with the party and an investigation of the party's background which, for intermediaries, should be reviewed and approved by CIS Commodity Inspection Services' compliance Committee
- making known its Compliance Principles to the party and seeking assurance that the party will comply with the Principles in so far as these apply to activities performed on behalf of CIS Commodity Inspection Services
- except in the case of subcontractors, obtaining the party's contractual commitment to comply with the Compliance Principles and to allow CIS Commodity Inspection Services to verify this periodically
- monitoring the party's continual compliance with the Principles (and in the event of discovering a breach taking remedial action)
- not dealing with any parties known to be involved in bribery.
- verification through a remuneration analysis, approved by CIS Commodity Inspection Services' Compliance Committee, that the remuneration paid to each intermediary is appropriate and justifiable for legitimate services rendered, and does not facilitate improper payments by the intermediary.
- CIS Commodity Inspection Services accounts for all intermediaries' remuneration in a separate general ledger account in its accounting records and consolidates all such payments made by any of its operations and prepares annually a consolidated management statement of all intermediaries' remuneration.
- for intermediaries and other parties as may be appropriate, CIS Commodity Inspection Services should provide training and support.

10.

CIS Commodity Inspection Services monitor the effectiveness of its Programme through the use of annual management declarations and internal auditing

11.

CIS Commodity Inspection Services arranged for the effectiveness of the implementation of the Programme by having it examined at least annually by a competent independent external audit firm.

12.

CIS Commodity Inspection Services submits copies of the independent assurance report, including any reportable conditions, annually to IFIA within six months of the end of its financial year.