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AFA
Agence Française Anticorruption

National survey of anti-corruption programmes in companies



2024 Survey results



In 2020 and 2022, the French Anti-Corruption Agency (AFA) carried out a national survey on anti-corruption programmes in companies. These two surveys provided an overview of the perception of corruption and the implementation of anti-corruption measures within French companies.

In spring 2024, the AFA decided to carry out a third survey on the same theme, to continue this work of assessing evolutions in the appropriation of corruption prevention and detection measures, on the eve of the eighth anniversary of the Sapin II Act¹. This survey does not aim to be a fully comprehensive reflection of the state of implementation of the Sapin II Act in French companies. Indeed, it may be assumed that the respondents are more conscious or committed to the scheme, which has an impact on the results. However, as this is the third survey of its kind, it provides an insight into developments since the previous surveys. It also enables the AFA to focus more accurately on any potential difficulties companies may face and thus to improve or adjust its support missions.

These results confirm the progress observed in the previous diagnosis, whether in terms of awareness of corruption and influence peddling offences or the implementation of anti-corruption measures. Nevertheless, there is still room for improvement, particularly among companies not subject to the obligations set out in Article 17 of the Sapin II Act.

The survey results provide information on all company populations, whether they are small and medium-sized enterprises² (SMEs), intermediate-sized enterprises³ (ISEs) or large enterprises⁴ (LEs) and, for the last two categories, whether or not they are subject to the obligations set out in Article 17 of the Sapin II Act.

Some economic sectors were particularly active in this survey and are thus well represented in the population of respondent companies. The AFA remains at the disposal of those sectors to report about relevant specifics.

Isabelle JEGOUZO

Director of the French Anti-Corruption Agency

¹ [Law no. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of economic life](#), known as the « Sapin II Act ».

² Small and medium-sized enterprises (SMEs) are those employing fewer than 250 people, with annual turnover not exceeding €50 million or balance sheet total not exceeding €43 million ([article 3 of decree no. 2008-1354 of December 18, 2008](#)).

³ Intermediate-sized companies (ISEs) or Mid-sized Enterprises are those employing fewer than 5,000 people, with either a turnover inferior to 1.5 billion euros, or total assets not exceeding 2 billion euros ([article 3 of decree no. 2008-1354 of December 18, 2008](#)).

⁴ Large enterprises (LEs) are companies employing more than 5,000 people, and a turnover beyond 1.5 billion euros or a balance sheet total in excess of 2 billion euros ([article 3 of decree no. 2008-1354 of December 18, 2008](#)).

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Method

As in 2020 and 2022, the AFA used an anonymous online survey questionnaire (see Appendix 1). It was first disseminated by professional federations, and then made publicly accessible, unlike previous surveys, on the AFA website. In addition, for the first time, the Agency organized a webinar, open to all companies, to answer any questions the survey might raise.

The questionnaire was sent to all companies, regardless of their sales turnover, number of employees or activities. It consisted of 29 questions divided into three parts, dealing respectively with the description of the respondent organisation (I), its understanding of corruption and influence peddling offences (II), and finally the prevention and detection strategies set forth within the organisation in question.

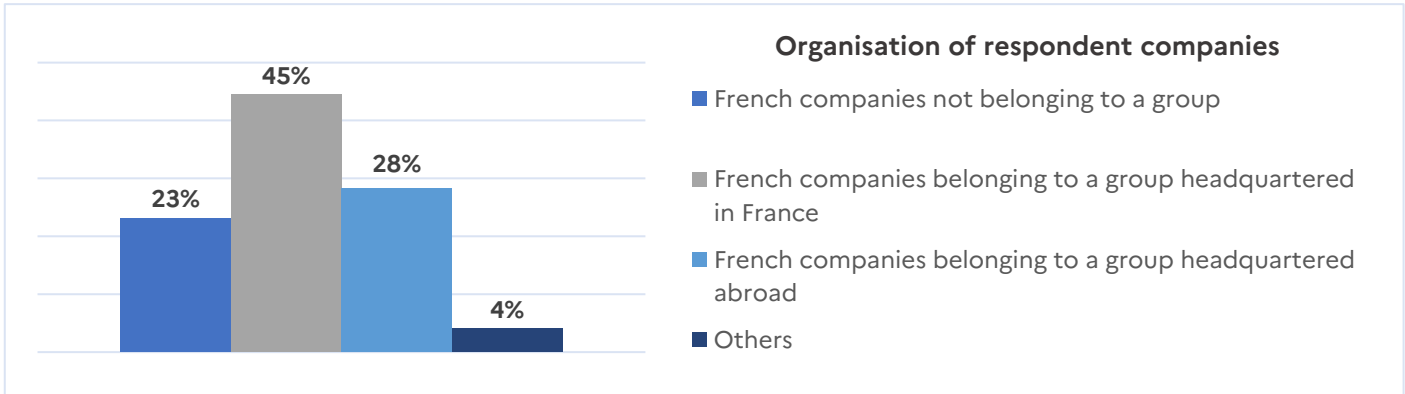
The survey collected over 550 responses, 173 of which were fully usable. Results provided below are compared with those of the previous surveys, when relevant. They also highlight, when necessary, the differences between companies subject to the obligation, laid down in Article 17 of the Sapin II Act, to implement a corruption prevention and detection programme, and those that are not⁵.

⁵ Given the relatively small sample size, it should be borne in mind that not all changes in results observed between 2022 and 2024 surveys are necessarily significant in the statistical sense of the term. This is particularly true of small changes. If an observed difference has less than a 5% chance of being due to chance, we consider it "statistically significant". Unless otherwise indicated by an asterisk (*), all the trends discussed in this document meet this criterion.

I. Respondent companies

This section profiles the respondent companies. In particular, it enables to determine whether certain criteria are likely to influence the answers to the questions relating, on the one hand, to the understanding of bribery and influence peddling offences and, on the other hand, to the implementation of related prevention and detection measures.

1. Typology of respondent companies

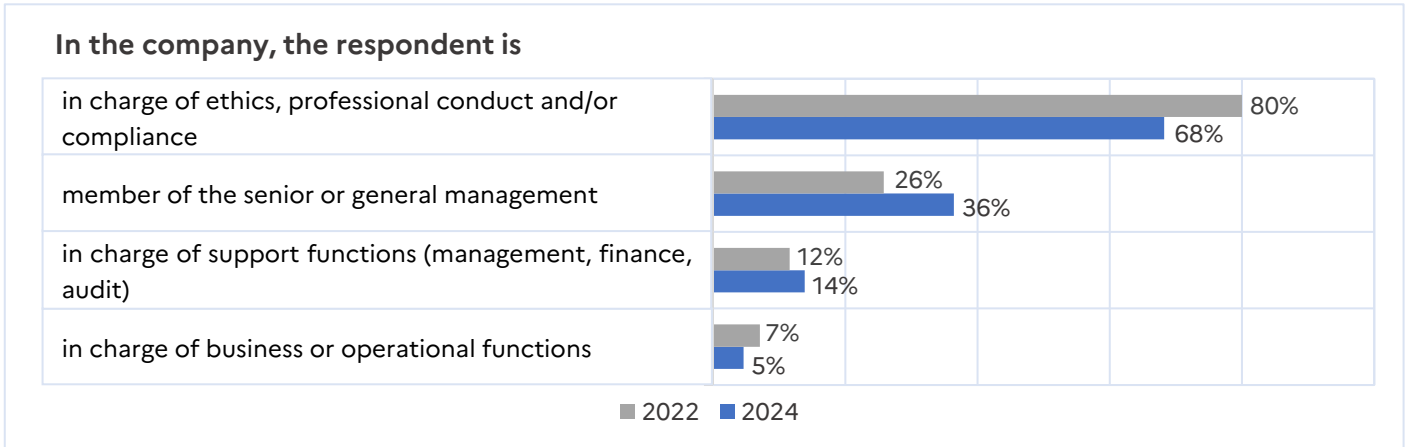


Almost half of the respondent are French companies belonging to a group headquartered in France (45%). French companies belonging to a group headquartered abroad accounted for 28% of the respondents, while French companies not belonging to a group represented 23%. Among the other organisations (4%) that responded to the questionnaire, there is one public industrial and commercial establishment (EPIC) and several foreign companies.

	Survey 2020	Survey 2022	Survey 2024
Companies subject to Article 17	46%	58%	66%
Companies not subject to Article 17	54%	42%	34%

Over the surveys, companies subject to Article 17 of the Sapin II Act represent an ever-increasing share of this diagnosis (46% in 2020, 58% in 2022 and 66% in 2024).

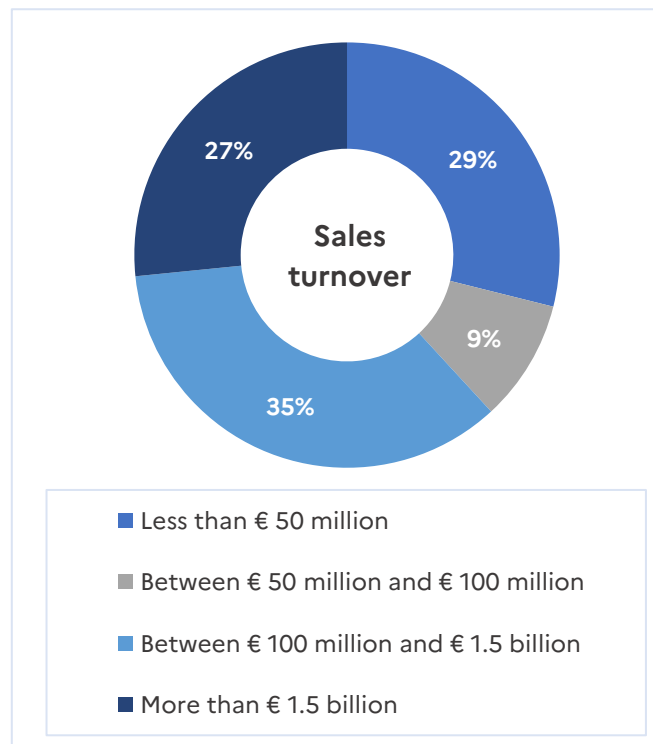
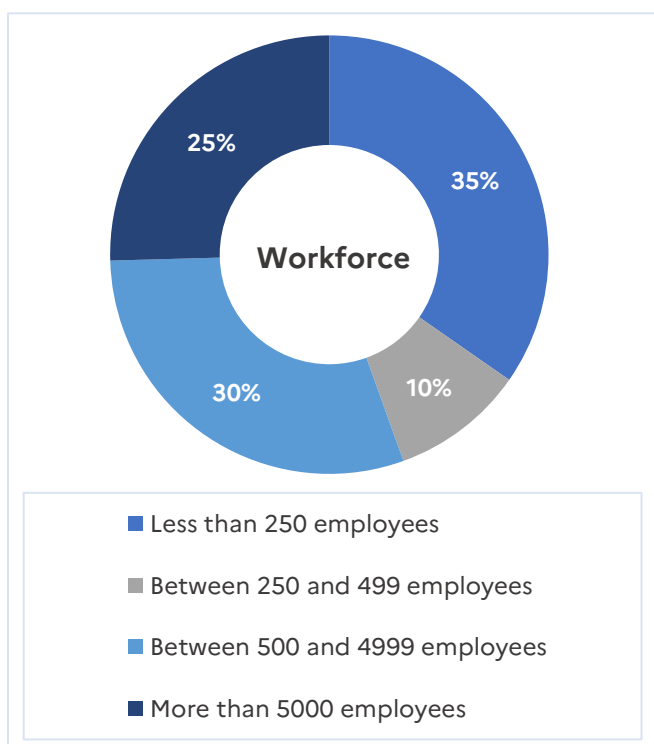
2. Positions of the respondents



It was requested that the questionnaire be completed, whenever possible, by one of the individuals considered to have the most complete view of the organisation and its activities.

Therefore, the majority of respondents are in charge of ethics, professional conduct or compliance (68%), although the proportion is lower than in 2022 (80%). In fact, the proportion of respondents who are members of senior or general management has increased compared to the previous survey (36% in 2024, +10 points).

3. Sales turnover and workforce



The survey shows a statistical distribution of respondent companies according to their number of employees and sales turnover relatively close to that of the 2022 survey:

- 24% of the companies are small and medium-sized enterprises (SMEs) (20% in 2022);
- 46% of the companies are intermediate size enterprises (ISEs) (45% in 2022);
- 30% of the companies are large enterprises (LEs) (35% in 2022).

4. Business industries

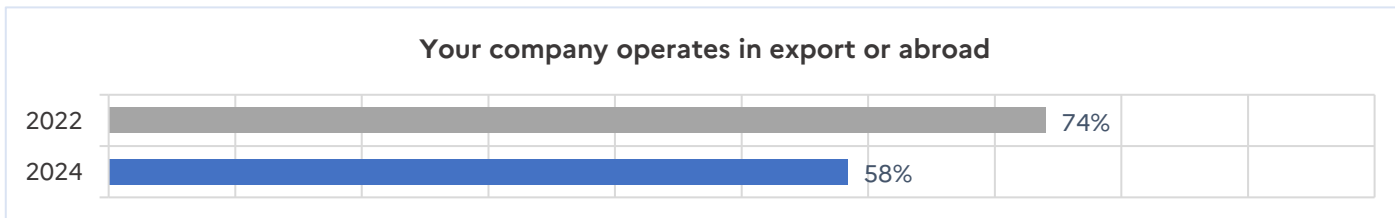
Financial and insurance activities (29%), human health and social action services (21%), service activities⁶ (16%) and manufacturing industry (14%) are particularly well represented in this survey. These results, close to those of 2022, once again show a strong representation of the banking, insurance and healthcare sectors, which are subject to sector-specific regulations and face risks specific to their activities.

⁶ Service activities include services provided by non-profit organisations, computer repair services, personal and household goods, laundry services, funeral services, etc.

Conversely, no companies in electricity, water, gas, steam or air conditioning sectors or for sanitation, waste management and pollution control sectors responded to the survey.

As a reminder, sectors of activity were aggregated into seven main business industries in the 2022 survey: financial and insurance activities (28%), industry (25%), construction (13%), trade (10%), services (6%), transport (3%) and other sectors (15%).

5. International

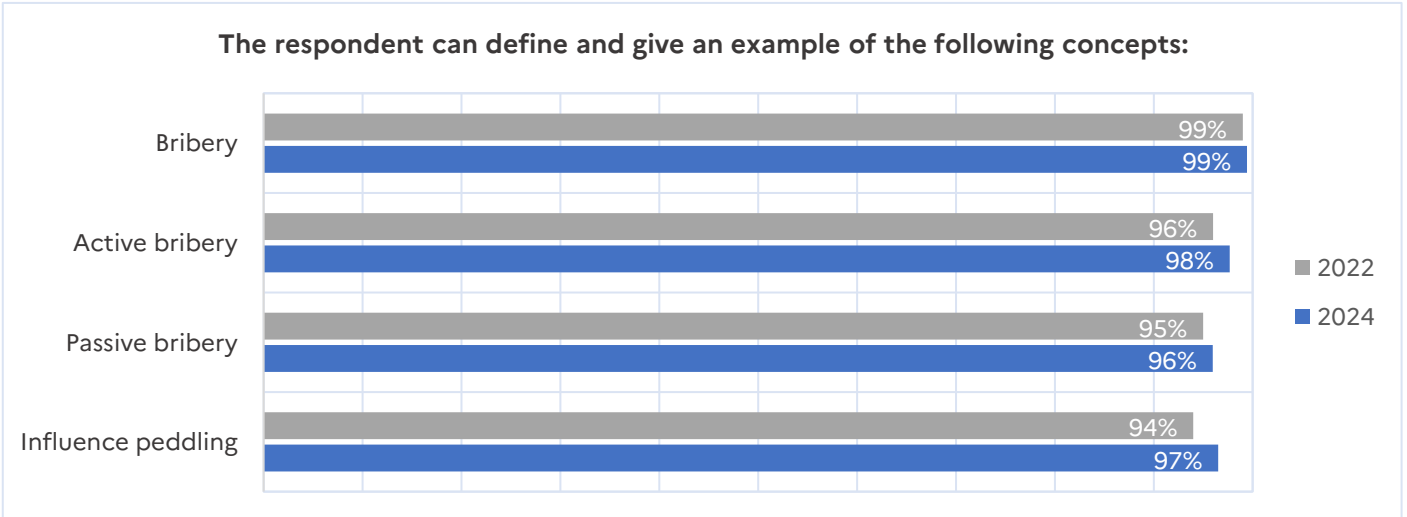


58% of respondent companies feature international activities. This decrease compared to 2022 can be explained by the typology of the respondent companies, which are mostly French companies not belonging to any group or belonging to a French group (68%).

II. Understanding of bribery and influence peddling

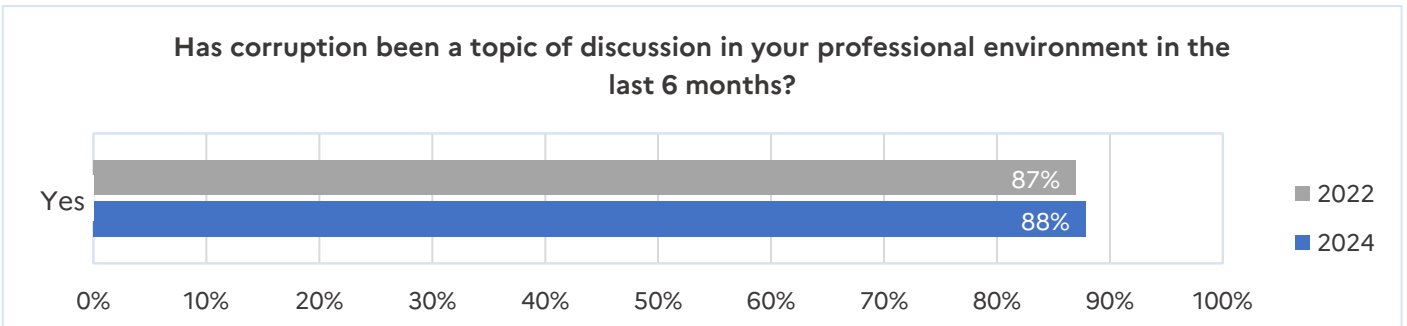
This second part is intended to assess the level of understanding of bribery and influence peddling offences in the respondent companies, as well as the perception of corruption risk by the professionals working there.

1. The concepts of bribery and influence peddling



As in 2022, almost all respondents feel they can define corruption, whether active or passive, and influence peddling, as well as give examples.

2. The theme of corruption in the working environment



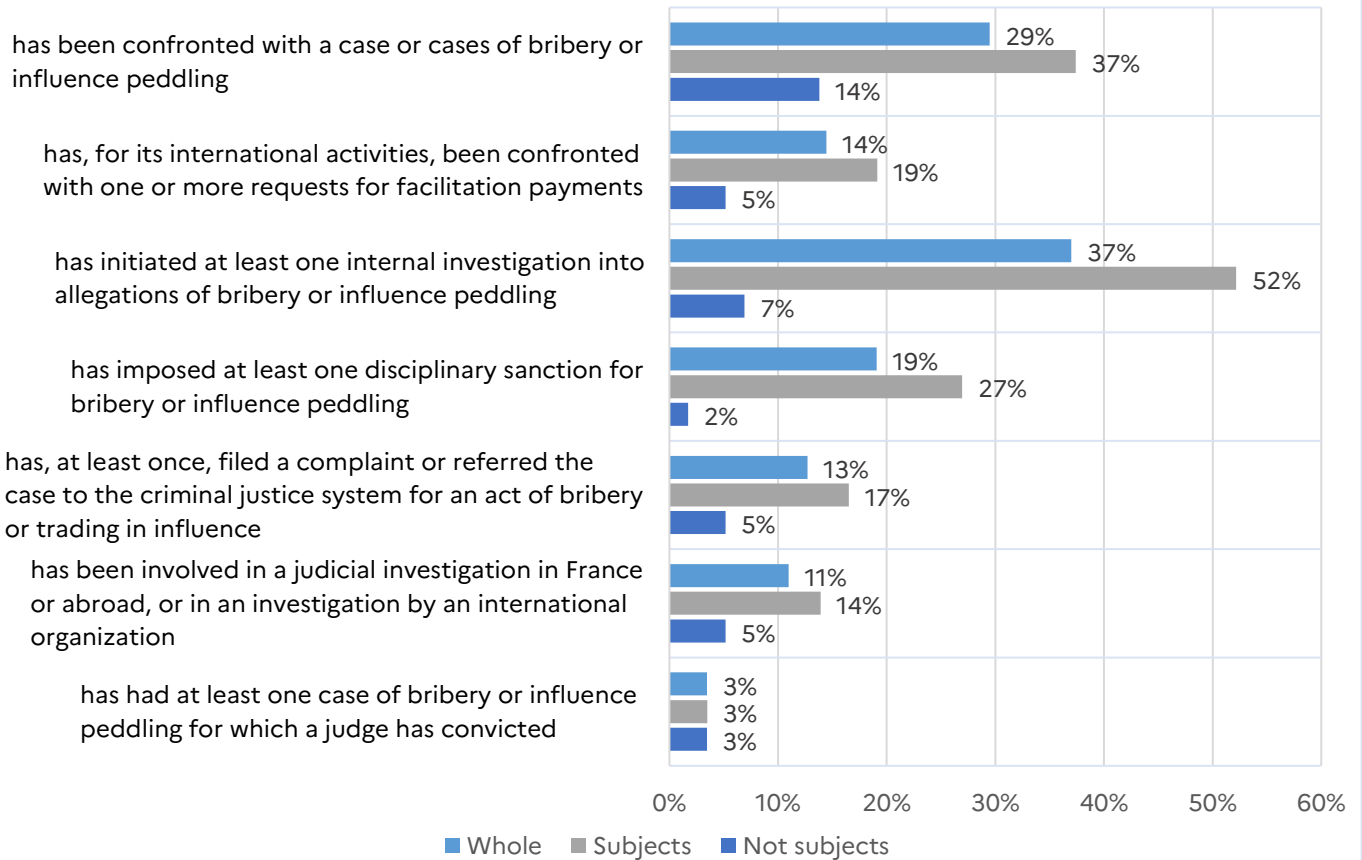
Corruption has been discussed in the past six months in the working environment of the vast majority (88%) of respondents, as in 2022.

However, there is a noticeable difference between subject companies (99%) and non-subject companies (66%), indicating that there is still scope for improvement when it comes to raising staff awareness of anti-corruption issues within companies that are not subject to the Sapin II Act.

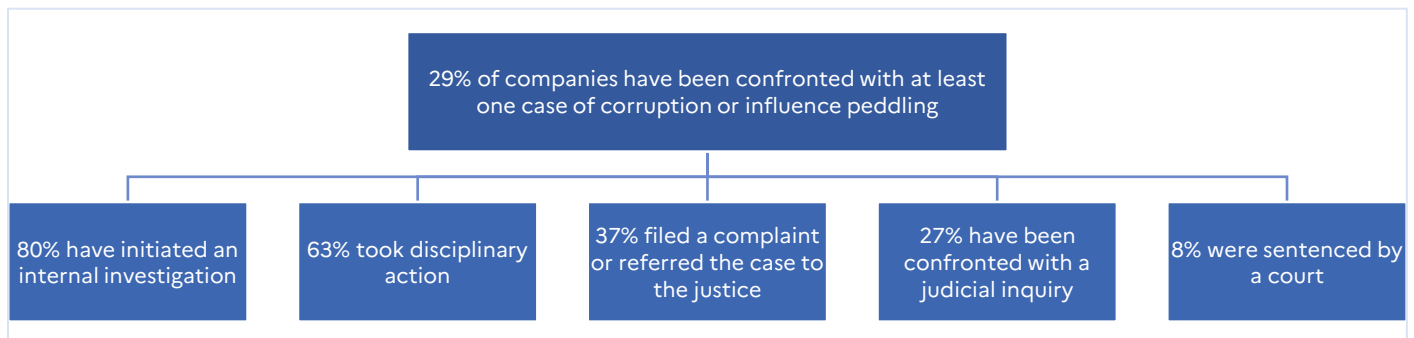
3. Cases of corruption within companies in the last 5 years

As in 2022, more than a third of respondent companies had initiated an internal investigation into allegations of corruption or influence peddling (37%), particularly subject companies (52%). They also impose disciplinary sanctions (19%).

In the last 5 years, the company

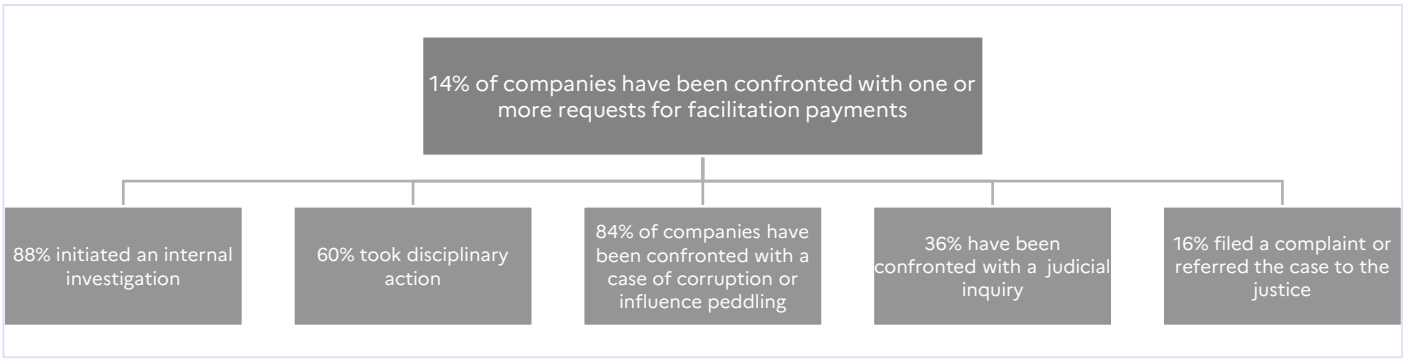


Nearly 30% of respondent companies have been confronted with at least one case of corruption or influence peddling in the last five years. Among these, a clear majority (80%) have initiated an internal investigation and taken disciplinary action (63%). In terms of legal action, the respondent companies may have referred the case to the judicial authorities (37%), been confronted with a judicial investigation (27%) or, more rarely, known of a case that has resulted in a conviction (8%).



Facing requests for facilitation payments (14% of the respondents have been confronted to such requests), the vast majority of respondent companies (88%) have also initiated an internal investigation.

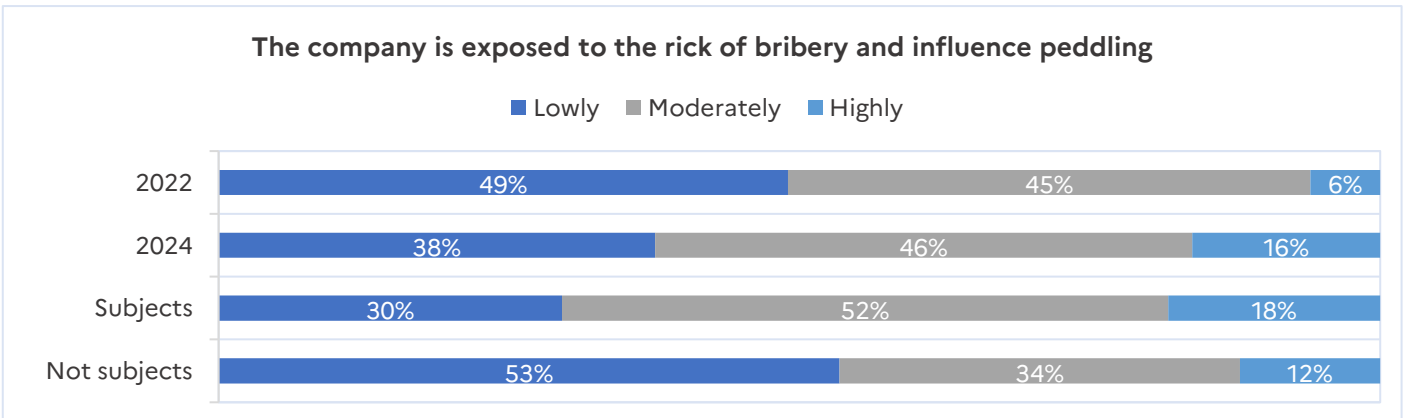
As a reminder, and in order to raise awareness of the risks associated with facilitation payments (which are considered as bribery acts under French law), the AFA published in October 2023 a [support on the issue of facilitation payments](#).



As in 2022, 12% of respondents have been personally confronted with corruption or influence peddling in their current role, or solicited for this purpose in the last five years. The majority of respondents are in charge of ethics, professional conduct or compliance.



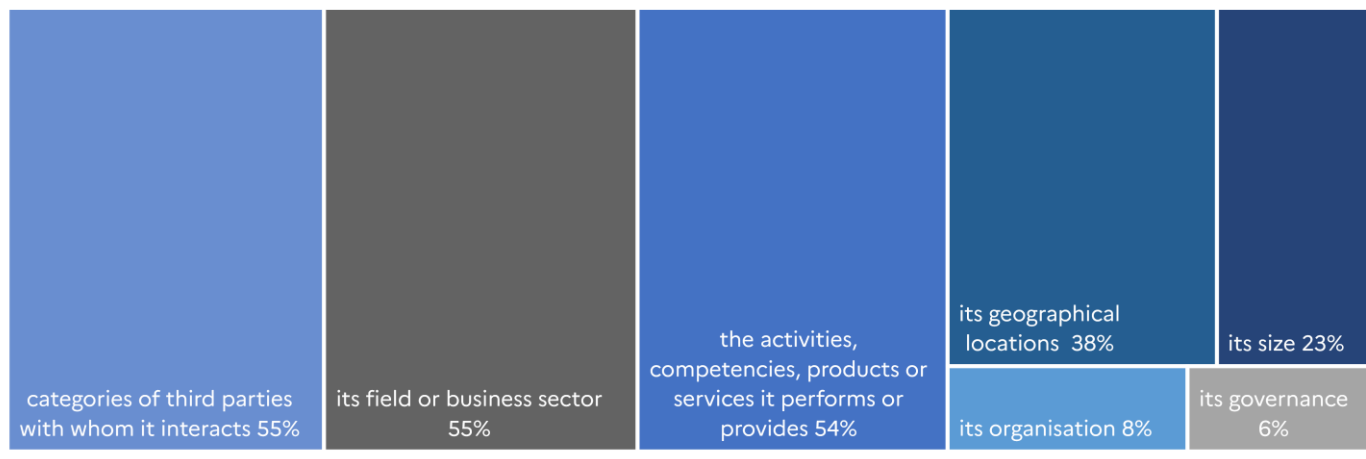
4. Exposure to the risk of bribery and influence peddling



Half of companies consider themselves slightly exposed to the risk of corruption and influence peddling (46%).

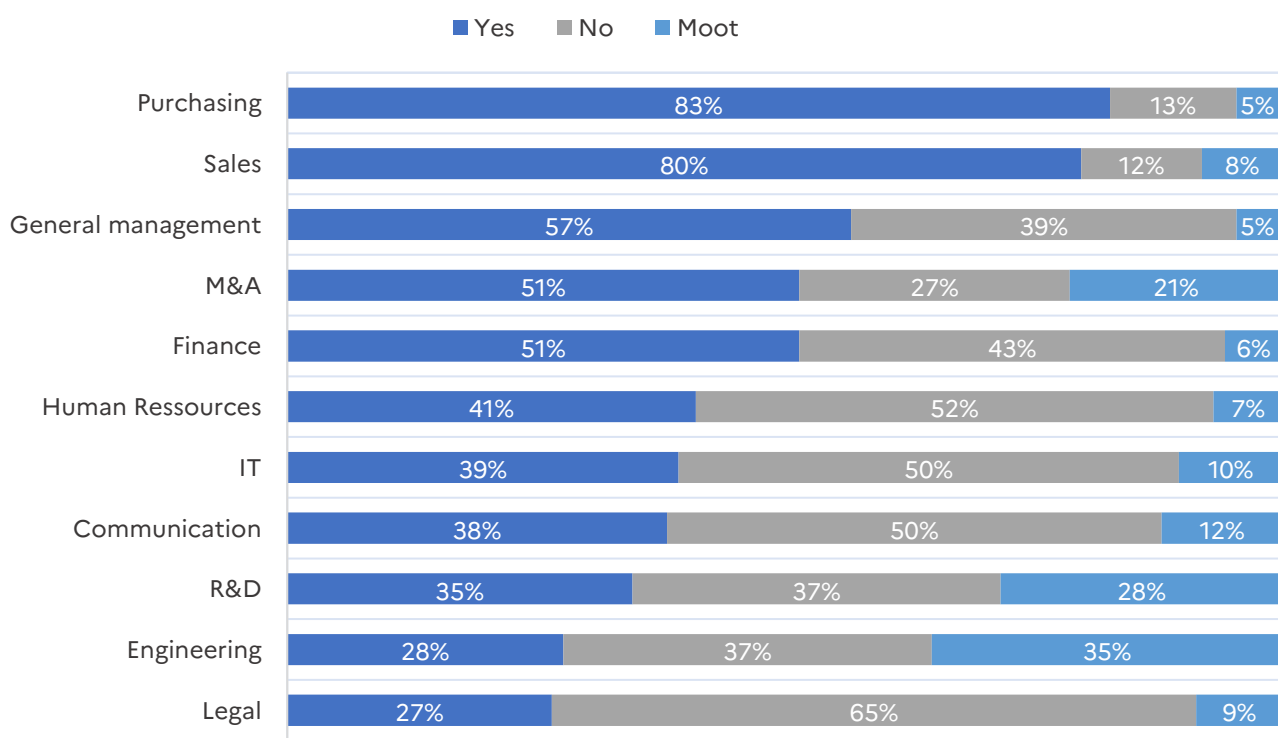
The proportion of subject companies considering themselves highly exposed to the risk of corruption and influence peddling has increased (18% in 2024 compared with 10% in 2022). This is all the more significant for companies not subject to the Sapin II Act (12% in 2024 compared with 0% in 2022). These results seem to highlight a greater awareness of the risk of corruption and influence peddling, among both subject and non-subject companies.

The company is likely to be exposed to the risk of corruption and influence peddling as a result of



Respondent companies see themselves as exposed to the risk of corruption and influence peddling mainly because of their third-parties (55%), their field or sector of activity (55%) and their activities, competencies, products or services (54%).

Is there a risk of bribery and influence peddling in these areas

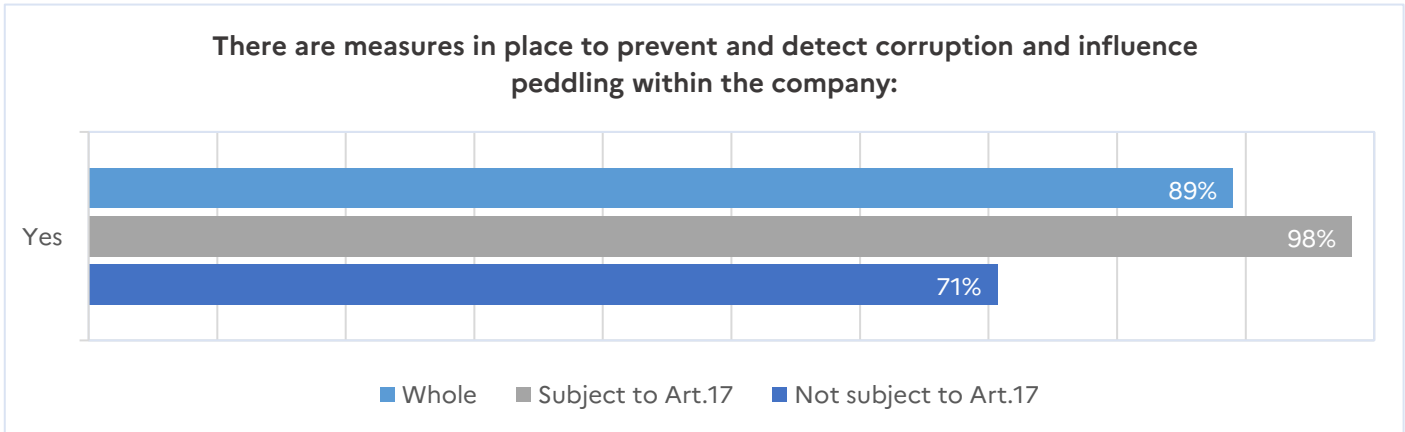


As in 2022, the functions considered by respondents most exposed to the risk of corruption and influence peddling are purchasing (83%), sales (80%) and general management (57%). This perception of risk is more widespread in the legal (27%) and engineering (28%) functions, which sometimes fall outside the scope of corporate vigilance.

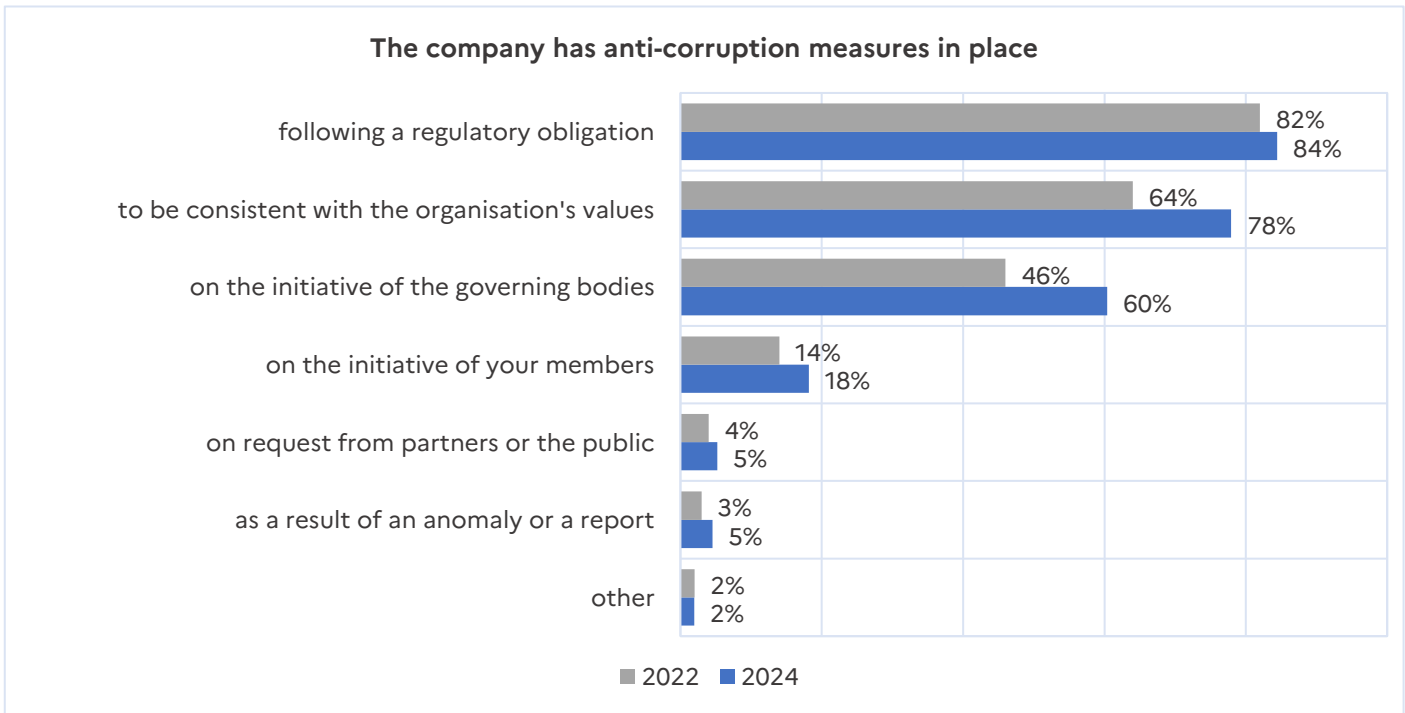
III. Prevention and detection of corruption

The AFA's mission is to help the competent authorities and the individuals who are confronted with it to prevent and detect corruption. To this end, the AFA published [recommendations](#) on 12 January 2021 providing guidance on how to implement an effective prevention and detection programme, adapted to the organisation's risk profile. This third part aims to determine the level of understanding and maturity of anti-corruption measures within companies, particularly with regard to the Agency's recommendations.

1. Anti-corruption measures in companies



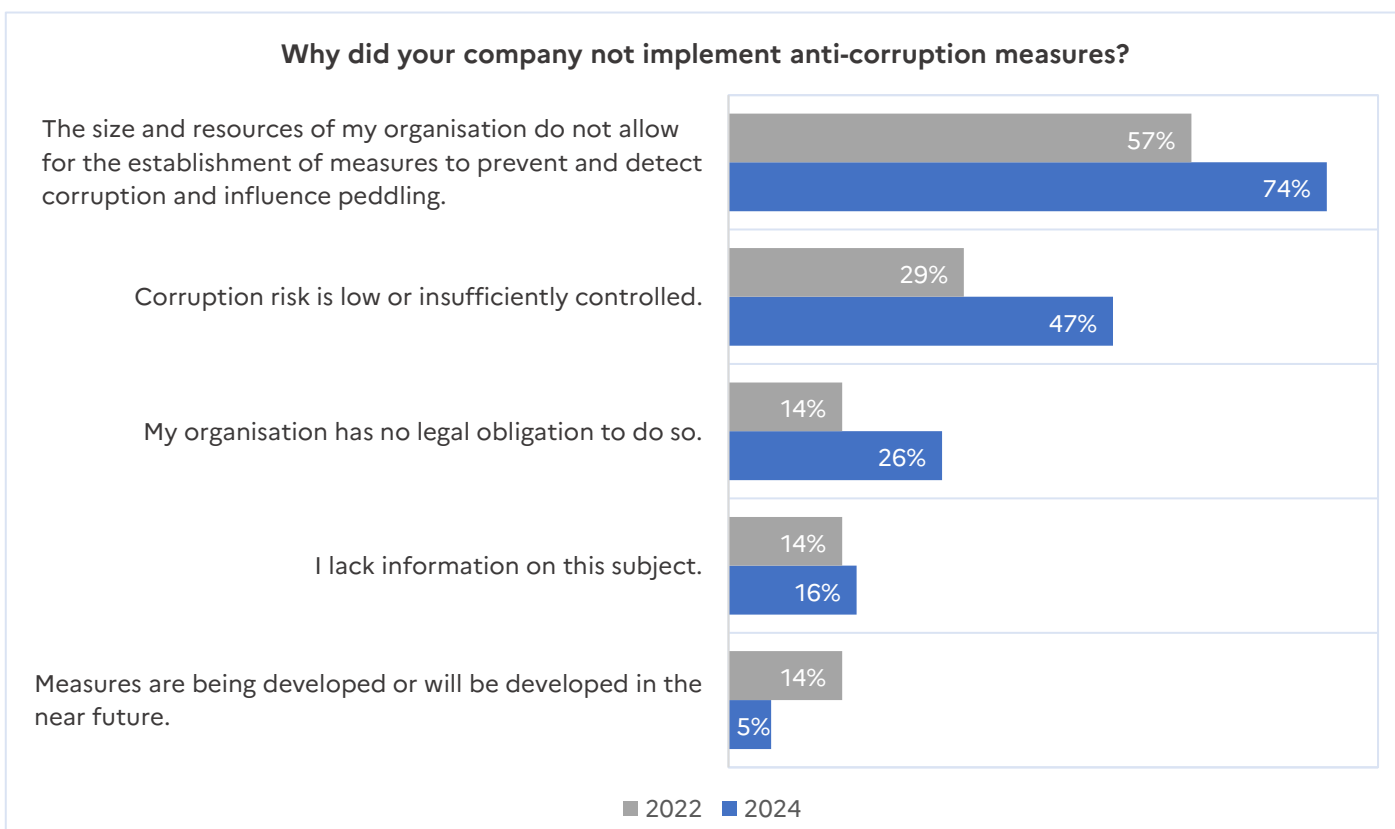
The vast majority (89%) of respondent companies (whether or not subject to Article 17) have implemented measures to prevent and detect corruption and influence peddling. However, these figures must be interpreted in the light of the bias introduced by this survey, which mainly affected companies already familiar with the anti-corruption programme.



The majority of respondent companies that implemented anti-corruption measures did so at the initiative of management bodies (60%), as a result of regulatory obligations (84%) and to be

consistent with the organisation's values (64%). These results are comparable to those of the 2022 survey.

Among other reasons, respondents also indicated that they had implemented anti-corruption measures at the request of the parent company or following a negotiated legal measure.



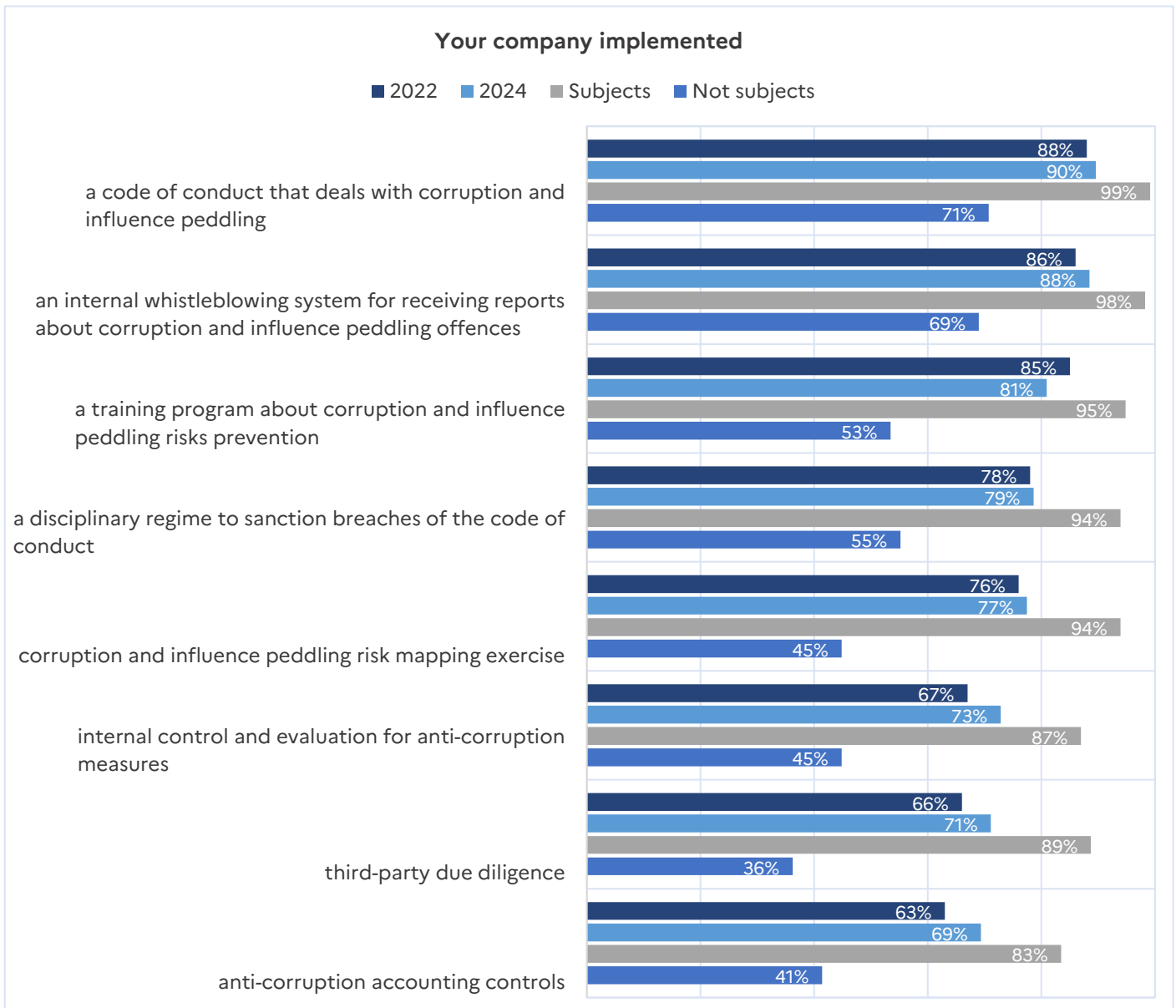
Among the respondents who have not implemented anti-corruption measures, the main reason given is the organisation's lack of means and resources (74%, + 17 points compared with 2022). It should be noted that most of these companies are not subject to Article 17 of the Sapin II Act and are therefore smaller in size.

Nearly half of these companies consider the risk of corruption and influence peddling as low or sufficiently controlled (47%). Among these companies, 79% felt that their exposure was low.

2. The maturity of the anti-corruption programme

Globally, there has been a slight increase* in the number of measures implemented since 2022. Among the anti-corruption measures respondents most frequently indicate they have implemented are an anti-corruption code of conduct (90%), an internal whistleblowing system (88%) and an anti-corruption training programme (81%).

More than half of the respondent companies (57%) report having implemented all the measures listed in Article 17 of the Sapin II Act.

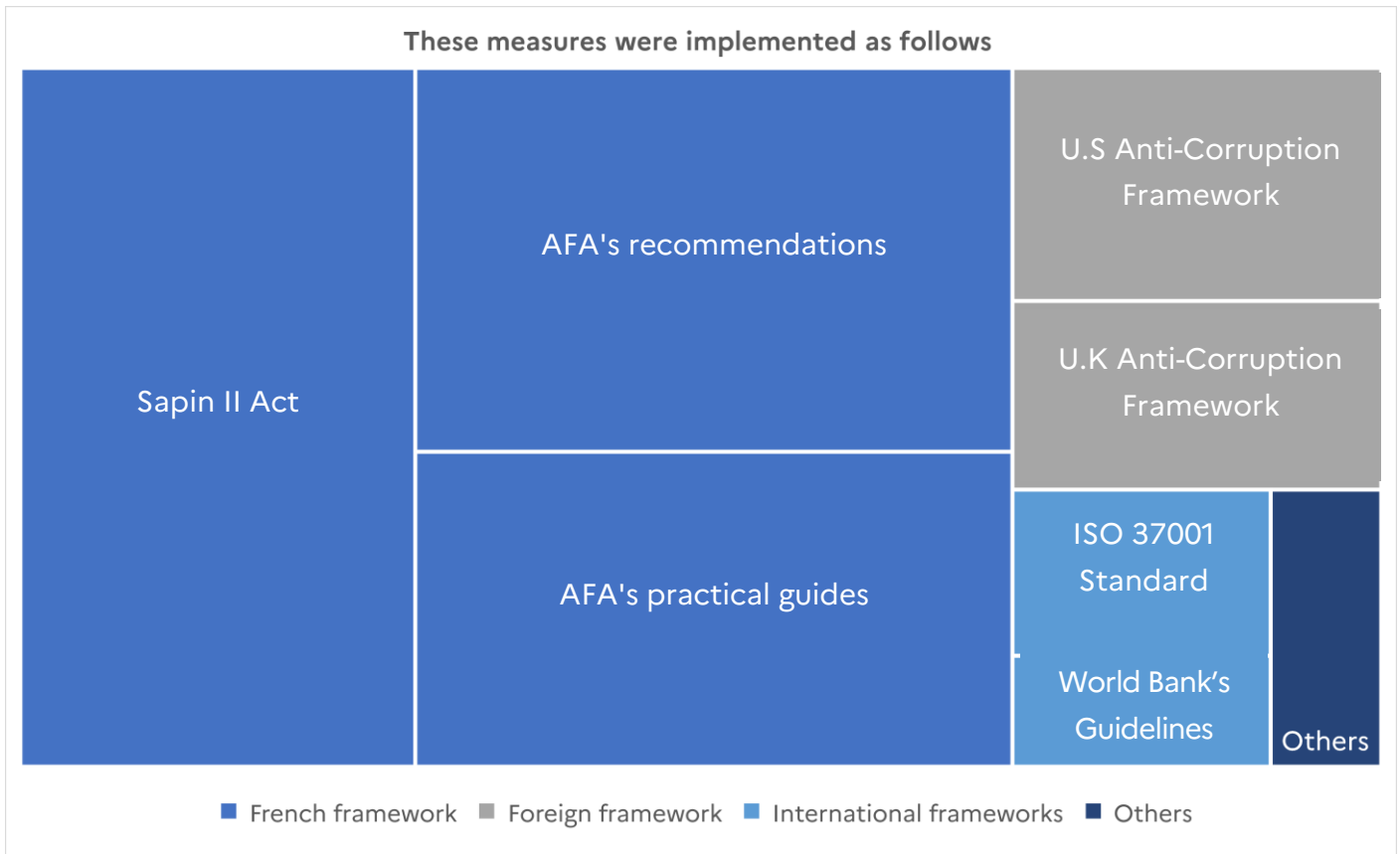


To implement the anti-corruption measures listed above, most of the respondent companies followed the French anti-corruption framework, consisting of the Sapin II Act (71%), AFA's recommendations (65%) and practical guides (53%).

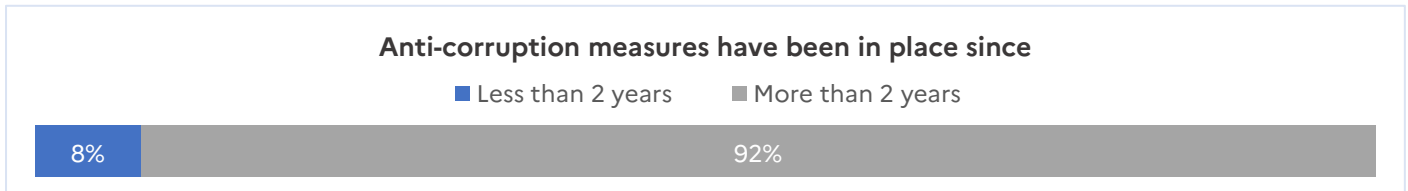
Under one quarter of the respondent companies have followed foreign guidelines, such as the American anti-corruption framework (including the FCPA and the FCPA resource guide) and the British anti-corruption framework (including the UKBA and the UKBA guidance).

Lastly, the ISO 37001 standard and the World Bank Group's guidelines are little used by respondent companies.

Among the other standards mentioned, respondent companies indicated that they follow their organisation's internal rules, other countries' frameworks, international conventions (OECD, UN) or sector-specific regulations.



Regarding the maturity of the measures implemented, the vast majority of companies indicate that they have been in place for over two years (92%, +6 points compared to 2022*).



Those measures are not updated on a regular basis.

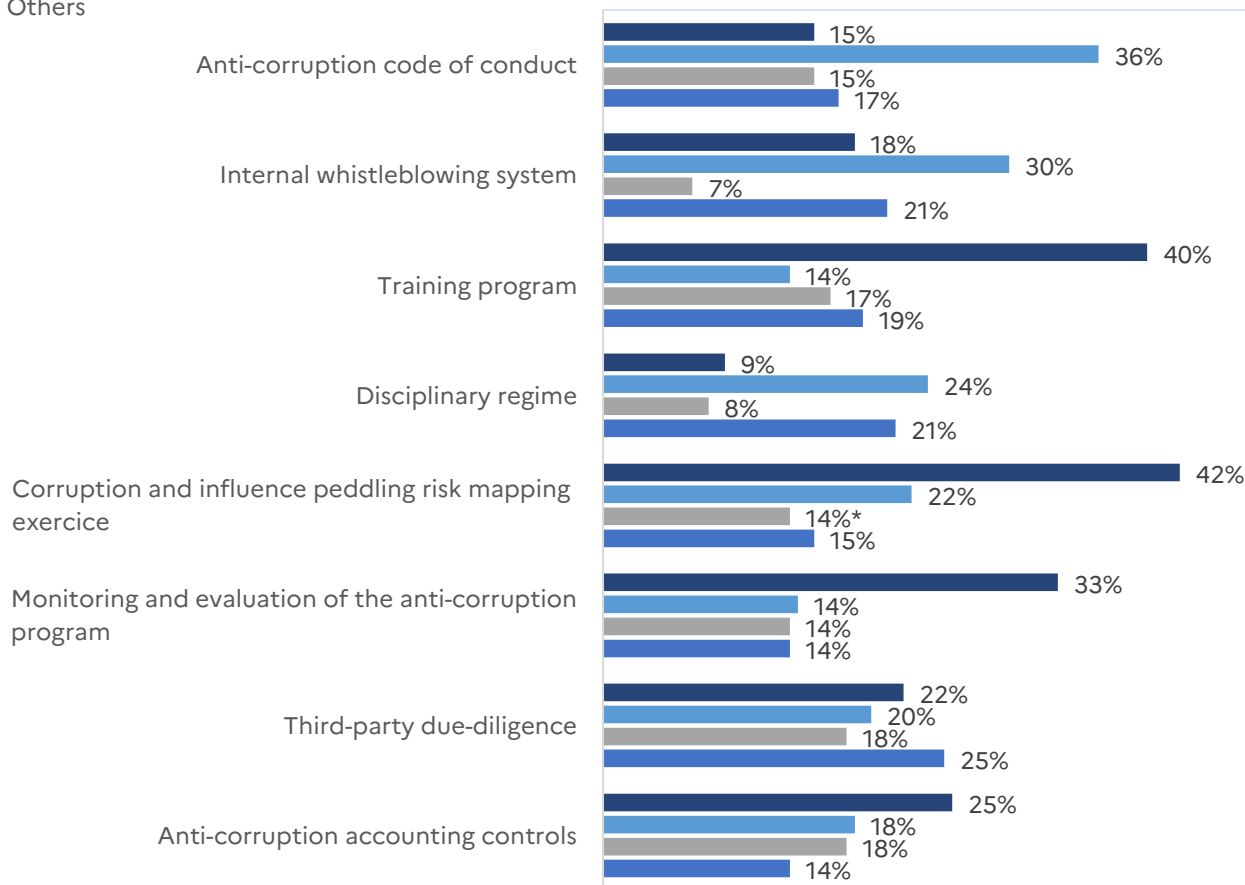
Some measures, such as the corruption and influence peddling risk mapping (42%), the training programme (40%) and the internal control and evaluation system (33%), tend to be updated annually.

Other measures, such as the anti-corruption code of conduct (36%), the internal whistleblowing system (30%) and the disciplinary regime (24%), are updated following major events.

Respondents also reported that updates of the measures occur in accordance with legislative or regulatory developments, in times of changes in the group policy or next to new directives from the parent company, or at even longer intervals (every two or three years). Respondents declare that they rarely update their measures and procedures following a risk mapping update.

Since their implementation, the following measures have been updated:

- Annually
- During significant events
- Following the update of the risk map for corruption and influence peddling*, the Group is now in a position to identify and manage the risks associated with corruption and influence peddling*
- Others



*In the case of corruption and influence peddling risk mapping, this is an update of a measure other than mapping.

3. Implementation of anti-corruption measures

A majority of respondent companies consider third-party due diligence as the most difficult measure to implement (49%, -10 points vs. 2022*), followed by the mapping of corruption and influence peddling risks (29%, - 13 points compared to 2022) and anti-corruption accounting controls (28%, - 2 points compared to 2022*). Nevertheless, there is a downward trend in the proportion of respondents reporting such difficulties.

Among the difficulties mentioned by some respondent companies:

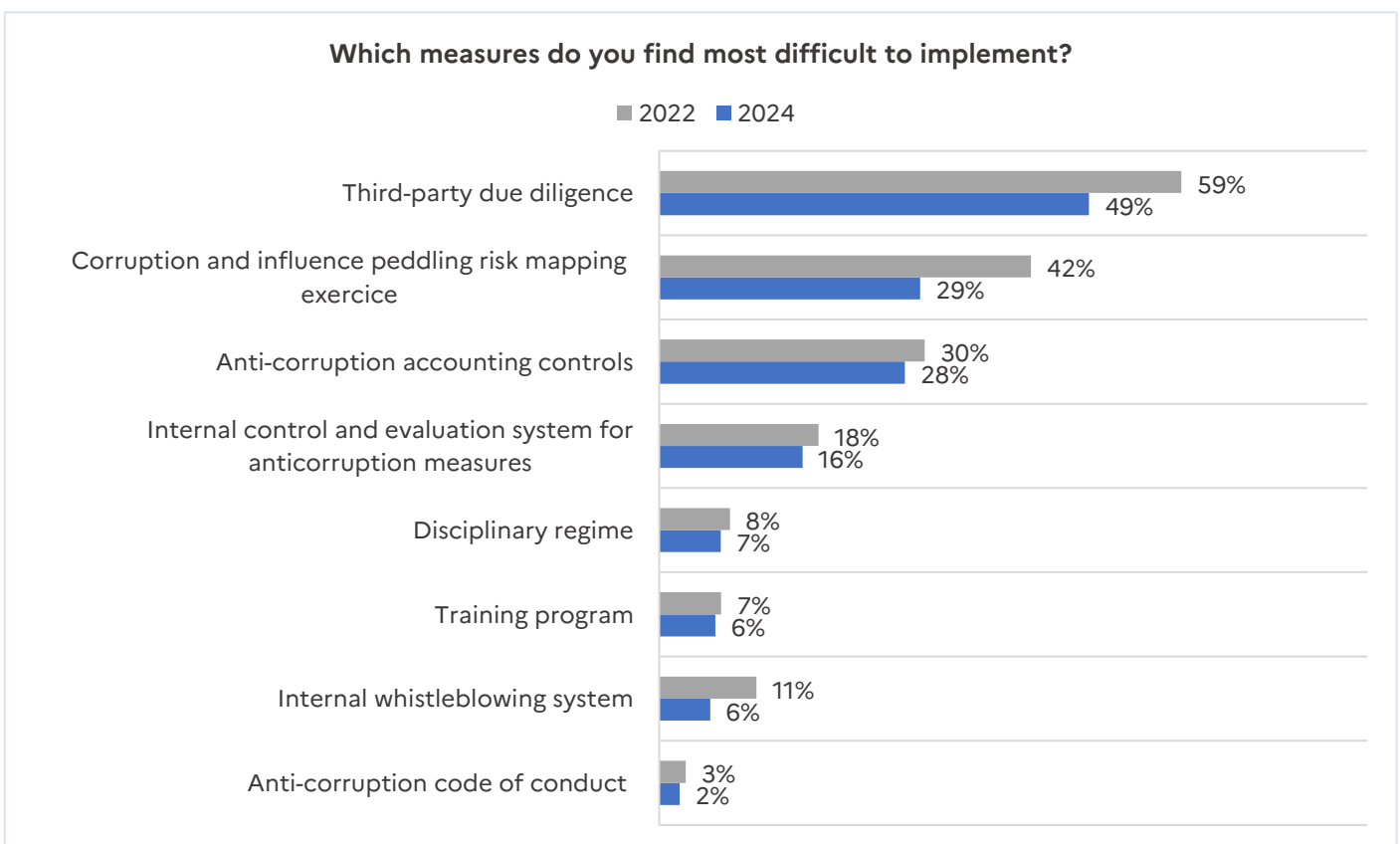
- When implementing third-party due diligence, companies encounter difficulties due to the sheer volume and diversity of third parties to be assessed, requiring considerable

resources. Companies do not always find the adequate tools for the job, especially when collecting information that may be purely declarative and unreliable.

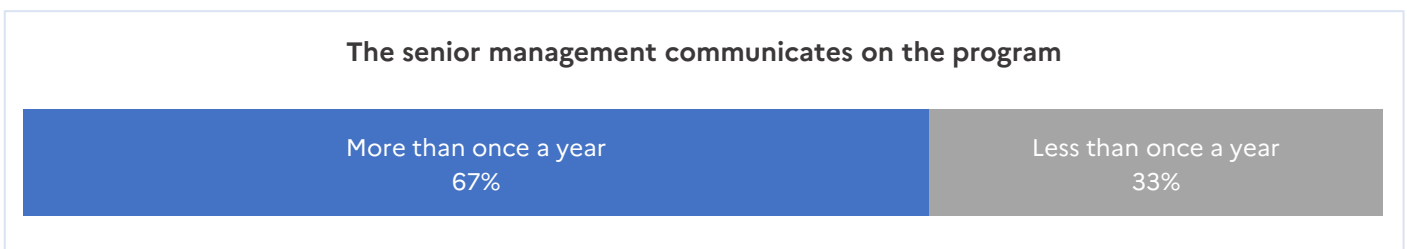
Due to the broad scope covered by the risk map (which includes companies' geographical locations, their subsidiaries, their various activities, etc.), companies have indicated that the measure is burdensome to implement, time-consuming and requires significant human and financial resources. Furthermore, companies experience difficulties regarding the methodology to be applied and the updating of this measure.

- With regard to anti-corruption accounting controls, companies have emphasized that these are specific and technical, and appear to add to existing controls handled by other teams. Companies have also stressed the difficulties of managing the volume of data involved, and of coordinating them with the internal control system.

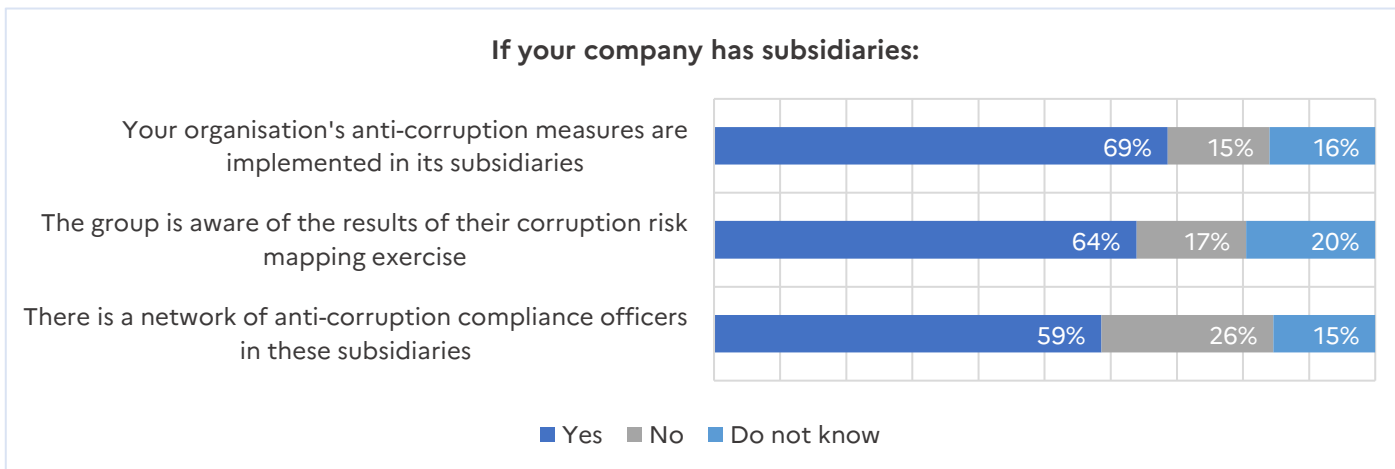
These difficulties may partly explain why third-party due diligence and anti-corruption accounting controls emerged as the two least implemented measures, according to the respondent companies.



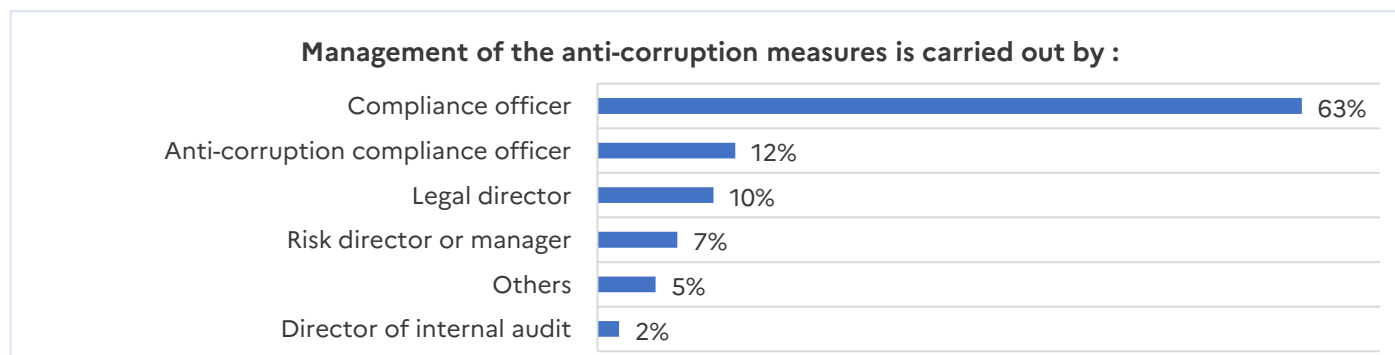
The senior management communicates on the programme more than once a year for two-thirds of the companies (67%, + 13 points compared to 2022).



If the company has subsidiaries, the company's anti-corruption measures are implemented in its subsidiaries in 69% of cases and the group is aware of the results of their corruption risk mapping exercise in 64% of cases. However, more than half of companies have a network of anti-corruption compliance officers in these subsidiaries (59%).



4. Management of the anti-corruption measures



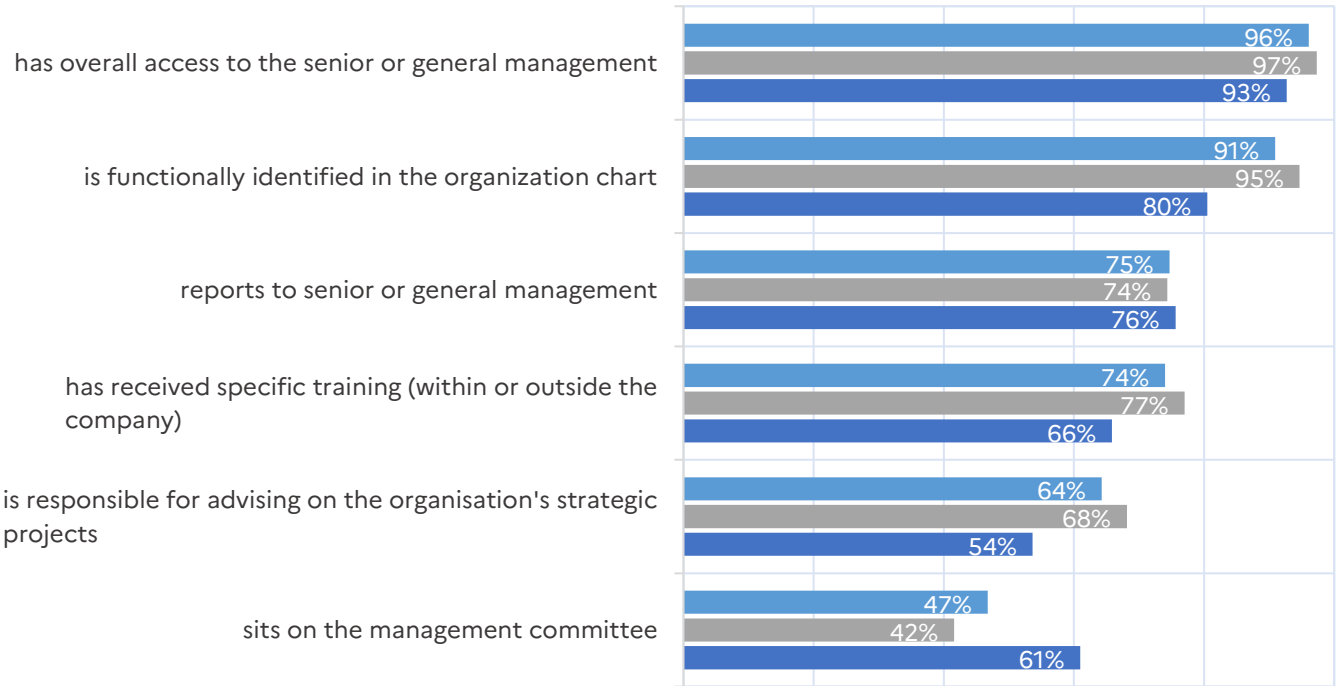
The management of anti-corruption measures is mainly carried out by the compliance officer (63% of respondents), who is often responsible for different areas of compliance. Otherwise, this task is carried out by a manager specifically responsible for anti-corruption compliance (12%), or by the legal director (10%).

Among the other people in charge of this task, the risk manager and senior management were also mentioned.

The person responsible for managing these measures has overall access to management or senior management (96%) and is functionally identified in the organisation chart (91%).

The person in charge of managing the anti-corruption measures

■ Whole ■ Subject ■ Not subject



5. Taking into account the risk of corruption and influence peddling

The risk of corruption and influence peddling is taken into account in the procedure:



The 2024 survey shows a real increase in the awareness of the risk of corruption and influence peddling in the procedures of respondent companies, with a predominance concerning the "purchasing" (84%, +7 points compared to 2022*), "sales" (83%, +15 points compared to 2022), "accounting and finance" (80%, +10 points compared to 2022) and, to a lesser degree but with a significant increase, human resources (69%, +14 points compared to 2022) functions.

All employees, regardless of their hierarchical position, are made aware of the need to take into account corruption risks in their daily activities:



70% of respondent companies indicate that they are making all their employees aware of the need to take into account corruption and influence peddling risks in their daily activities, regardless of their hierarchical position. These results are similar to those obtained in the 2022 survey. The majority of employees still seem to have opted for a broad awareness of these issues.

To conclude the 2024 survey, a new open-ended question has been added to gather respondents' opinions on the main benefits or difficulties associated with implementing an anti-corruption compliance system. The results are summarized in the table below.

In your opinion, what are the main contributions or difficulties involved in implementing an anti-corruption compliance system?

Main benefits

Most respondents stressed that the implementation of an anti-corruption compliance system improves risk prevention, detection and management, thereby protecting the company and its employees against the risks of corruption and influence peddling.

It helps to promote a culture of ethics and compliance, enhances the company's reputation and can be an attractive factor for both candidates and investors.

The anti-corruption compliance system is a tool for communicating with employees and raising their awareness of the fight against corruption, and drawing their attention to potential risks.

By deploying this system, the company also benefits from improved knowledge of its third parties, and fosters integrity and security in its business relations with customers and third parties.

Finally, the system makes it possible to meet certain legislative and regulatory requirements, while structuring the company's processes.

Main difficulties

The major difficulties encountered by respondents relate to the human and financial resources as well as the time required to implement an anti-corruption compliance system. Some measures are complex, burdensome and require a high degree of expertise.

Some companies also encounter difficulties in aligning methodologies within a group, while acknowledging the specific nature of their activities and geographical locations.

The obligation to implement such a system may distort competition with companies not subject to this requirement (due to their size or location). Certain measures may impact the company's business relationships and activities.

Some respondents also emphasized that it is sometimes difficult to secure the commitment of management bodies or to involve all their staff.

Finally, a number of companies underlined that such obligations can be difficult to reconcile with other legislative and regulatory obligations, and are sometimes disproportionate to the risks they face.

Synthesis and conclusion

Several of the survey's highlights underline the positive and lasting effect of the Sapin II Act in raising awareness of the risks of corruption and influence peddling that our companies may face, even if, as it has already been emphasized, these results can by no means be extrapolated to all French companies due to the certain bias engendered by the methodology of this survey.

The sample of respondents shows a very high level of awareness of the offences of corruption and influence peddling. This sensitivity to the risk may be attributed to the fact that a substantial proportion (nearly 30%) of respondents report having been confronted with a case of corruption or influence peddling in the last five years. The analysis of the functions most at risk once again reveals the sensitivity of sales and purchasing functions, as well as, and increasingly, human resources management and M&A operations.

A high proportion of companies react firmly when such risks arise, with 80% initiating an internal investigation and almost two-thirds imposing disciplinary measures.

For these same companies, the French anti-corruption framework developed since nearly eight years by the AFA on the basis of the terms of the Sapin II Act constitutes the basis of the system in place. Companies rely particularly on the various guides and compendiums of practical information designed specifically to help them set up or update an effective system of measures and procedures that comply with the law. Further progress can be reported in declaring the implementation of the eight measures and procedures of Article 17.

Despite these positive findings, the results for companies not subject to the law are lagging behind, with size in particular highlighted by respondents as a reason for not implementing preventive measures. The AFA's efforts to raise awareness and provide support for mid-sized companies and SMEs must therefore continue. [The guide for SMEs and small ISEs](#) published in 2021 by the AFA is thus gradually being enhanced by other kinds of educational tools designed to enable smaller companies to strengthen their prevention system (podcast,...).

In this respect, the increased non-financial reporting requirements resulting from the recent transposition of the CSRD directive, provide an opportunity to help these companies realizing they can benefit in several ways (reputation, risk control, quality of third parties and business partners) from investing in an initiative to control the risks of breaches of probity.

Regarding possible improvements, methodological difficulties are still reported, by all respondents, especially concerning the third-party evaluation exercise, but also occasionally concerning risk mapping itself and anti-corruption accounting controls. The AFA will be proposing new methodological support materials on these subjects in the coming months.

Section I – The organisation in which you work

1 Your organisation is

- a French company not belonging to any group
- a French company belonging to a group headquartered in France
- a French company belonging to a group headquartered abroad
- a foreign company belonging to a group headquartered in France
- other: [Free field]

2 In the company, you are

- member of the senior or general management
- in charge of ethics, professional conduct and/or compliance
- in charge of support functions (management, finance, audit)
- in charge of business or operational functions

3 The number of employees is

- Less than 250 employees
- Between 250 and 499 employees
- Between 500 and 4999 employees
- More than 5000 employees

4 The annual sales turnover of your company is

- Less than € 50 million
- Between € 50 million and € 100 million
- Between € 100 million and € 1.5 billion
- More than € 1.5 billion

5 The business industry in which your company operates is

- Agriculture, forestry and fishing
- Extractive industries
- Manufacturing industry
- Electricity, gas, steam and air conditioning production and distribution
- Water production and distribution; sewerage, waste management and remediation
- Construction
- Commerce; repair of motor vehicles and motorcycles
- Transportation and storage
- Accommodation and food services
- Information and communication
- Financial and insurance activities
- Real estate activities
- Professional, scientific and technical activities
- Administrative and support service activities
- Public administration
- Education
- Human health and social work

- Arts, entertainment and recreation
- Other service activities
- Activities of households as employers; undifferentiated activities of households as producers of goods and services for own use
- Extra-territorial activities

6 Your company is active internationally

- Yes
- No

7 Your organisation is subject to the Sapin II Act

- Yes
- No

Section II – Understanding of bribery and influence peddling

8 Can you define and give an example of the following concepts?

- | | |
|----------------------|--|
| ⇒ Bribery | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| ⇒ Active bribery | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| ⇒ Passive bribery | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| ⇒ Influence peddling | <input type="checkbox"/> Yes <input type="checkbox"/> No |

9 Has corruption been a topic of discussion in your professional environment in the last 6 months?

- Yes
- No

10 In the last 5 years, the company

- ⇒ Has been confronted with case or cases of bribery or influence peddling Yes No
- ⇒ Has, for its international activities, been confronted with one or more requests for facilitation payments Yes No
- ⇒ Has initiated at least one internal investigation into allegations of corruption or influence peddling Yes No
- ⇒ Has taken at least one disciplinary action for corruption or influence peddling Yes No
- ⇒ Has, at least once, filed a complaint or referred a case to the criminal justice system in connection with bribery or trading in influence. Yes No
- ⇒ Has faced a judicial investigation in France or abroad, or an investigation by an international organisation Yes No
- ⇒ Has experienced at least one case of corruption or influence peddling that has been convicted by a judge Yes No

Yes No

11 In the last 5 years, have you personally been confronted with bribery or influence peddling or have you been solicited to do so in the course of your current duties?

Yes No

12 The company is exposed to the risk of bribery and influence peddling

- Lowly
- Moderately
- Highly

13 The company is likely to be exposed to the risk of corruption and influence peddling as a result of [multiple choice]

- The activities, skills, products or services it provides
- Its governance structure
- Its organisation
- Its size
- Its field or sector of activity
- Its geographical locations
- Categories of third parties with whom it interacts
- Other: [Free field]

14 Is there a risk of bribery and influence peddling in these areas?

- | | |
|--|--|
| <input type="radio"/> Purchasing | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Sales | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Communication | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Engineering | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> General management | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Human resources | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> IT | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Legal | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> M&A | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> R&D | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |
| <input type="radio"/> Finance | <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> not applicable |

SECTION III – Prevention and detection of corruption

15 In your organisation, did your company implement measures to prevent and detect bribery and influence peddling offences, i.e. one or more of the following: corruption risk mapping exercise, anti-corruption code of conduct, training programme, third-party due diligence, internal whistleblowing system, anti-corruption accounting controls and internal control, internal control monitoring and evaluation, and disciplinary regime?

Yes No

16 Why did your company not implement anti-corruption measures?

- The size and resources of my organisation do not allow for the establishment of measures to prevent and detect corruption and influence peddling
- Corruption risk is slow or insufficiently controlled
- Measures are being developed or will be developed in the near future
- My organisation has no legal obligation to do so.
- I lack information on this subject
- Other

17 The company has anti-corruption measures in place

- Following a regulatory obligation
- To be consistent with the organisation's values
- On the initiative of your members
- On the initiative of the governing bodies
- On request from partners or the public
- As a result of an anomaly or a report
- Other

18 Anti-corruption measures have been in place for

- Less than 2 years
- More than 2 years

19 These measures have been implemented according to [multiple choice]

- The Sapin II Act
- AFA's recommendations
- AFA's practical guides
- ISO 37 001 standard
- US anti-corruption framework (including FCPA and FCPA resource guide)
- UK anti-corruption framework (including UKBA and UKBA guidance)
- World Bank Group guidelines
- Other [Free field]

20 Management of the anti-corruption measures is carried out by

- Legal director
- Director of internal audit
- Risk director or manager
- Compliance officer
- Anti-corruption compliance officer
- Other

21 The person in charge of managing the anti-corruption measures

- ⇒ Reports to the senior or general management yes no do not know
- ⇒ Has overall access to the senior or general management yes no do not know
- ⇒ Sits on the management committee yes no do not know
- ⇒ Is functionally identified in the organisation chart yes no do not know
- ⇒ Is responsible for advising on the organisation's strategic projects yes no do not know

22 Corruptions risks are taken into account in the procedure

- ⇒ Purchasing yes no do not know
- ⇒ Sales yes no do not know
- ⇒ Human resources yes no do not know
- ⇒ Accounting and finance yes no do not know
- ⇒ M&A yes no do not know

23 The senior management communicates on the programme

- More than once a year
- Less than once a year

24 Your company implemented

- ⇒ Corruption risk mapping exercise yes no do not know
- ⇒ A code of conduct that deals with corruption yes no do not know
- ⇒ A training programme about corruption risks prevention yes no do not know
- ⇒ Third-party due diligence yes no do not know
- ⇒ An internal whistleblowing system for receiving reports about corruption offences yes no do not know
- ⇒ Internal control and evaluation for anti-corruption measures yes no do not know
- ⇒ Anti-corruption accounting controls yes no do not know
- ⇒ A disciplinary regime to sanction breaches of the code of conduct yes no do not know

25 Which measures do you find most difficult to implement?

- Corruption risk mapping exercise
- Anti-corruption code of conduct
- Training programme
- Third-party due diligence
- Internal whistleblowing system
- Internal control and evaluation system for anti-corruption measures
- Anti-corruption accounting controls
- Disciplinary regime

Why?

26 All employees, regardless of their hierarchical position, are made aware of the need to take into account corruption risks in their daily activities

- Yes
- No
- Partly

27 If your company has subsidiaries

- Your organisation's anti-corruption measures are implemented in its subsidiaries yes no do not know

- The group is aware of the results of their corruption risk mapping exercise
 - yes no do not know
- There is a network of anti-corruption compliance officers in these subsidiaries
 - yes no do not know

28 Since their introduction, the following measures have been updated [multiple choice]

- ⇒ Corruption risk mapping exercise
 - Annually
 - In the event of significant events
 - Following the update of another measure
 - Other [Free field]
- ⇒ Anti-corruption code of conduct
 - Annually
 - In the event of significant events
 - Following the update of the corruption and influence peddling risk mapping
 - Other [Free field]
- ⇒ Training programme
 - Annually
 - Following significant events
 - Following the update of the corruption and influence peddling risk mapping
 - Other [Free field]
- ⇒ Third-party due diligence
 - Annually
 - Following significant events
 - Following the update of corruption and influence peddling risk mapping
 - Other [Free field]
- ⇒ Internal whistleblowing system
 - Annually
 - Following significant events
 - Following the update of corruption and influence peddling risk mapping
 - Other [Free field]
- ⇒ Monitoring and evaluation of the anti-corruption programme
 - Annually
 - Following significant events
 - Following the update of corruption and influence peddling risk mapping
 - Other [Free field]
- ⇒ Anti-corruption accounting controls
 - Annually
 - Following significant events
 - Following the update of corruption and influence peddling risk mapping
 - Other [Free field]

- ⇒ Disciplinary programme
- Annually
- Following significant events
- Following updating of corruption and influence peddling risk mapping
- Other [Free field]

29 What are the main benefits or difficulties of setting up an anti-corruption system?

[Free field]