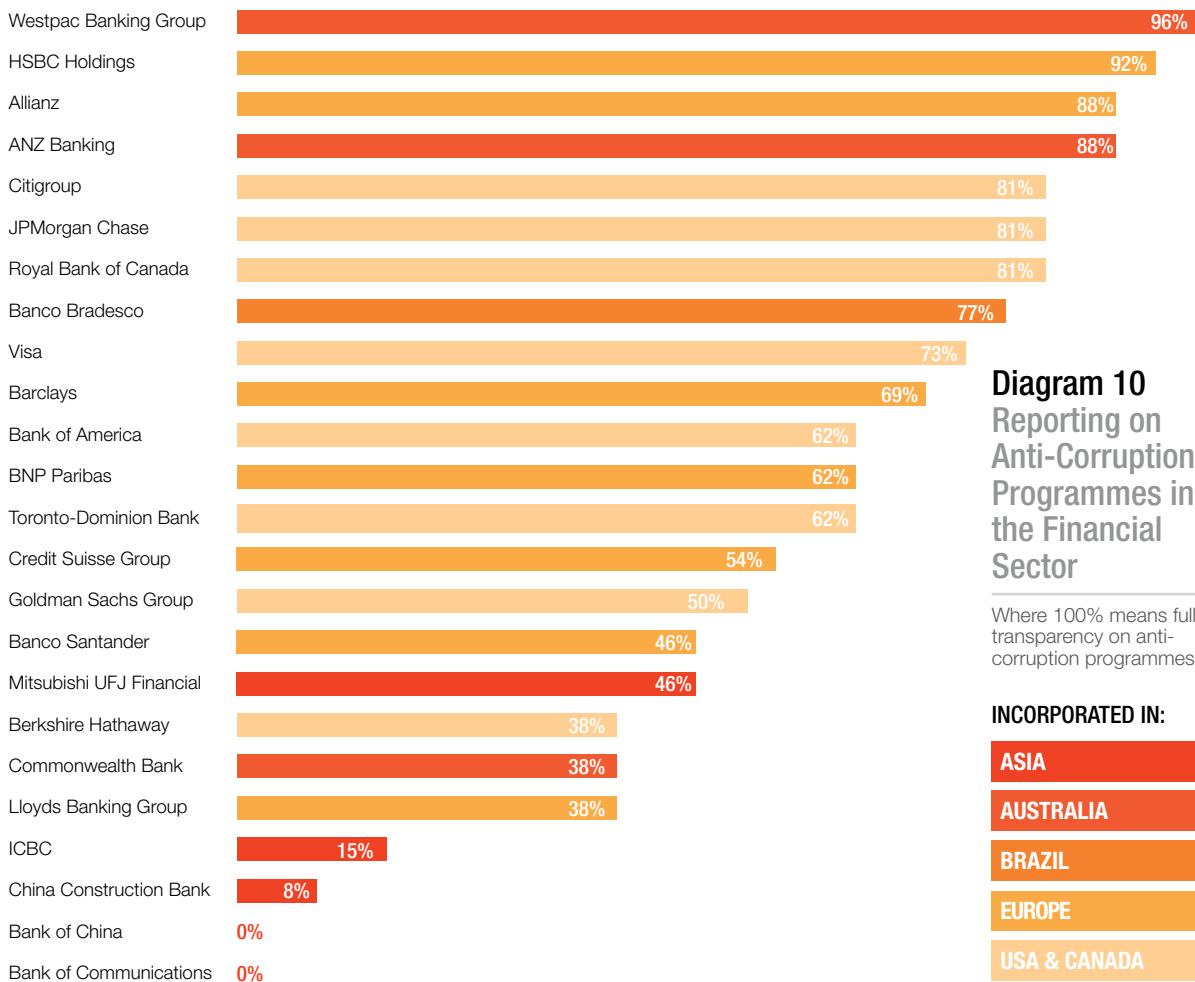


# REPORTING ON ANTI-CORRUPTION PROGRAMMES

The average result in reporting on anti-corruption programmes was 56 per cent, which is the lowest result among all industry groups. While this result reflects the fact that four Chinese banks occupied the last four positions, it is worth mentioning that the remaining financial companies were also below average. The best performing financial institution was Westpac Banking Group, which achieved a close to maximum possible score, missing only half a point in monitoring its anti-corruption programmes.

The large disparity in scores reflects the fact that such reporting is mostly voluntary. Financial companies, although highly regulated, are generally free to choose the level of public disclosure regarding their anti-corruption programmes. Some financial institutions expressed concern regarding disclosure of their anti-corruption programmes, indicating that they viewed these as part of their internal risk management. As such, they argue, these programmes should be kept confidential in order to gain competitive advantage. However, results show that some banks score well in this dimension. It is therefore possible to separate disclosure of proprietary risk models from best practice in anti-corruption reporting.

## FINANCIAL COMPANIES



**Diagram 10**  
Reporting on Anti-Corruption Programmes in the Financial Sector

Where 100% means full transparency on anti-corruption programmes

### INCORPORATED IN:

- ASIA
- AUSTRALIA
- BRAZIL
- EUROPE
- USA & CANADA