

	<b>100.102.008</b>	<b>Anti-Corruption Program - Global Appendix 8 WARNING FLAGS</b>		
<b>CORPORATE LEGAL ETHICS &amp; COMPLIANCE</b>	Policy Owner:	Associate General Counsel - Compliance		
	Effective Date:	2015-Jun-17	Rev: 4	Page 1 of 1

When working with Third Parties, keep your eyes open for "**Warning Signs.**" These warning signs are also sometimes referred to as red flags. They are situations that may arise to indicate a potential issue under international anti-bribery and corruption laws. The list below contains examples and is not all-inclusive. If in doubt, contact the Ethics & Compliance Office in Regal's Legal Department.

<b>QUALIFICATIONS &amp; REPUTATION</b>	<b>BUSINESS PRACTICES</b>
Lack of qualifications for project or assignment	Documents conceal the true identity of an in- country representative or agent
Heavy reliance on political or government contacts, as opposed to knowledgeable staff	Unusual or lavish expenses for entertainment, advertising or administrative activities
Refusal to answer questions about relationship with or interests involving government officials	Commission rate is higher than the "going rate" Payment descriptions do not correspond to the appropriate account
Relationship to a government official	Unrecorded accounts or transactions
Refusal to certify compliance with anti-bribery and corruption laws Refusal to agree in writing to follow relevant laws and Regal anti-corruption policies	Vague, non-specific description for payments made in entries  Request for payments in a third party country, to a third party, in "cash" or untraceable funds, or to off-shore accounts
Country, region or industry has a reputation for corruption and bribery	False or inaccurate expense account reports or requests for false invoices or documentation
Refusal to answer or provides evasive answers about company ownership structure, such as principals, subcontractors, etc.	Unwilling to subject its books and records to audit by Regal
Previous charges or convictions related to corruption	

Approvers:	<input type="checkbox"/> Risk & Compliance Committee <input checked="" type="checkbox"/> GC	Doc Storage info: 2014-00120: 0000006412
Languages:	Same as Anti-Corruption Policy – Global 100.102	
Revision History/Date Completed:	4: changed language reference to match Policy 3: format and changed to Appendix 8 2: revised changed name to "Warning Flags" New (Red Flags)	2015-Jun-17 2015-Jun-11 30 Aug 2012 2011-Aug

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