

# Anti-Bribery and Corruption (ABC) Conclusion

## Consequences of bribery and corruption

These are wide-ranging and serious. Colleagues could lose their jobs and face legal consequences. Zurich could be blacklisted, face reputational damage, be fined, and have its business licenses impacted.

Finally, the impact on corrupt societies is far-reaching: from poor prosperity (even worse in developing countries) to the uneven distribution of wealth.

## Associated Persons

Individuals or entities who perform services for, to, or on behalf of Zurich. Examples of Associated Persons include brokers, intermediaries, joint venture partners, distributors, and sub-contractors. Breaches and violations of ABC laws and regulations by an Associated Person may result in civil or criminal liability for, or regulatory enforcement measures against, Zurich.

## Due diligence: Associated Persons

Zurich must perform due diligence before selecting a party to be an Associated Person. The due diligence must be appropriate to the ABC risk that the relationship with the Associated Person may present.

## Due diligence: third-party payments

The due diligence process on payments to third parties should reveal potentially suspicious payments that require further investigation to confirm that the payment is not made as part of a bribe, or for any other inappropriate purpose, and specify measures to be taken based on the outcome of the due diligence.

## Red flags

Be alert to potential ABC “red flags” that may be associated with improper third-party payments. You can find examples in the Group Policy ABC. Red flags must be addressed through the third-party payment due diligence process.

## Reporting

Zurich is committed to fair and responsible business and takes a zero-tolerance approach to bribery and corruption. Contact Compliance with any questions you might have. **Speak up** if you suspect activity or a transaction that places Zurich at risk of bribery and corruption.

