



## **A SUMMARY OF BUSINESS INTEGRITY POLICIES**

- 1 FINANCIAL CRIME**
- 2 MANAGEMENT OF CONFLICTS OF INTEREST**
- 3 CORPORATE GOVERNANCE**

**CDC Group**  
**29 May 2012**

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## Summary of CDC's Business Integrity Policies

### Overall objectives:

- To exhibit honesty, integrity, fairness and respect in all CDC's business dealings
- To enhance the good reputation of CDC
- To manage CDC's affairs prudently and with due skill, care and diligence
- To conduct day to day business in an appropriate and consistent way (ensuring compliance with all applicable laws and regulations)

CDC is authorised in the United Kingdom by the Financial Services Authority as an investment management firm to conduct venture capital business.

CDC's operating framework encompasses the following business integrity policies:

### **Financial crime - Anti-money laundering, anti-bribery and anti-fraud**

Compliance with all applicable UK and EU laws and those of the countries in which we invest, including regulations intended to fight financial crime.

### **Management of conflicts of interest**

- Giving and receiving of gifts and entertainment; political contributions

Our employees are prohibited from giving or receiving gifts (including entertainment) which might conflict with their duties to CDC. Gifts in excess of £50 (or its local equivalent) must be disclosed to the Compliance Officer. Contributions to political parties and candidates are prohibited.

- Personal account trading

Our employees are subject to detailed personal account dealing rules requiring prior approval from the Compliance Officer before conducting personal trades in certain investment products.

- Use of confidential information

CDC operates strict controls over confidential information. Any such information received by a CDC employee can only be used for the intended purpose and not for the personal benefit of the employee.

- Disclosure of outside directorships and investments

On recruitment all senior managers are required to disclose any existing directorships and investments. Any subsequent appointments or outside business interests are subject to approval.

### **Corporate governance**

Clearly defined responsibilities, operating terms of reference, written procedures and controls.

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The Board of CDC has assigned its responsibilities to a number of non-executive Committees whose responsibilities and reporting requirements are clearly defined by written terms of reference, which are available for review on our website:

- Audit, Compliance and Risk
- Development
- Nominations
- Remuneration

For more details on these policies, please contact the CDC communications team on 020 7963 4702.

