

# Interim Reporting Framework INGO Accountability Charter

TRANSPARENCY INTERNATIONAL E.V.

## 1. Profile of the Organisation

<b>Name of the organisation</b>	Transparency International e.V.
<b>Vision</b>	A world in which government, politics, business, civil society and the daily lives of people are free of corruption.
<b>Mission</b>	Create change towards a world free of corruption.
<b>Values</b>	Transparency, Accountability, Integrity, Solidarity, Courage, Justice, Democracy
<b>Primary brands</b>	Global Corruption Report, Bribe Payers' Index, Global Corruption Barometer, Corruption Perceptions Index, National Integrity System Studies, TI Anti-Corruption Handbook, Advocacy and Legal Advice Centres.
<b>Major programmes</b>	Corruption in Public Contracting, Corruption in the Private Sector, Corruption in politics, International Anti-Corruption Conventions, Poverty and

	Development, Access to Information, Advocacy and Legal Advice Centres, Education, Health, Humanitarian Assistance, Judiciary
<b>Core activities</b>	<ul style="list-style-type: none"> <li>• Coalition-building with stakeholders from all sectors of society and strategic anti-corruption advocacy</li> <li>• Influence change of laws, regulations and practices on national and international level, monitoring key institutions</li> <li>• Monitoring international anti-corruption conventions and their implementation at national level</li> <li>• Research: Measuring, analysing and diagnosing corruption</li> <li>• Awareness-raising</li> <li>• Honour courageous individuals and organisations around the globe that make a distinct difference in curbing corruption through the TI Integrity Award.</li> </ul>
<b>Ownership and legal form</b>	<i>eingetragener Verein</i> (registered Society), registered at the Local Court Berlin-Charlottenburg, Germany. Charity status granted
<b>Operational structure</b> <i>Including roles and responsibilities of global and national entities</i>	<p><b>Membership Meeting</b> (consisting of Individual Members and one Official Chapter Representative (OCR) per accredited “National Chapter”</p> <p>The Annual Membership Meetings elects the 12 Members of the <b>Board of Directors</b> from amongst the IMs and the NCs’ OCRs</p> <p><b>National Chapters:</b> independent (self-governed and financed) NGO’s that</p>

	<p>have adopted the TI Vision, Values and Guiding Principles, that are working on a national level on anti-corruption projects through fostering national coalitions against corruption, and comply with TI's accreditation and accountability requirements.</p> <p><b>Individual Members:</b> (IMs) individuals of high integrity, competence, dedication and experience contributing to the work of TI at the regional and global level.</p> <p>The <b>International Secretariat's</b> focuses on the global and regional fight against corruption, and assists national chapters. The Secretariat coordinates initiatives within geographical regions and provides methodological support on the tools and techniques to fight corruption. It also serves as the driving force on international issues such as anti-corruption conventions, and other cross-border initiatives. It serves as a knowledge management centre, capturing and disseminating best practice and developing new approaches to tackle corruption.</p>
<b>Location and address of global headquarters/ secretariat</b>	<p>Transparency International Secretariat Alt-Moabit 96 10559 Berlin, Germany</p>
<p><b>Number of countries where the organisation operates</b> <i>Please attach list of all countries where you operate</i></p>	<p>91 through its (independent) accredited National Chapter and National Chapters in Formation (National Contacts cannot use the name of Transparency International) List can be found at: <a href="http://www.transparency.org/contact_us/ti_nc">http://www.transparency.org/contact_us/ti_nc</a></p>
<b>Number of employees</b>	<b>80</b>

<b>Finance</b>	<b>'000 €</b>	<b>2005</b>	<b>2006</b>	<b>2007</b>
Income from				
- <b>Individual donations</b>		<b>559</b>	<b>601</b>	<b>289</b>
- <b>Foundations</b>		<b>398</b>	<b>459</b>	<b>705</b>
- <b>Governments</b>		<b>6,048</b>	<b>6,505</b>	<b>7,097</b>
- <b>International Organisations</b> <i>UN, EU, World Bank etc.</i>		<b>324</b>	<b>404</b>	<b>686</b>
- <b>Business</b>				
- <b>Others - <i>please specify</i></b>		<b>215</b>	<b>195</b>	<b>315</b>
- Travel reimbursements		89	76	107
- Foreign exchange translation gains		74	26	20
- Rental income		15		
- Speaker's fees		12	9	17
- Publications		1	1	8
- Interest income		22	53	141
- Other		2	30	22
<b>TOTAL INCOME</b>		<b>7,544</b>	<b>8,164</b>	<b>9,093</b>
<b>Total income by country - for countries/regions that make up 5 percent or more of total income</b> <b><i>Please list countries and provide total income for each one</i></b>		See Attachment for TI-S income		
Expenditure for				
- <b>Programmes and activities directly addressing the organisation's purpose</b>		<b>4,984</b>	<b>5,540</b>	<b>5,870</b>
- <b>Fundraising</b>		<b>209</b>	<b>224</b>	<b>307</b>
- <b>Administration</b>		<b>1,579</b>	<b>1,557</b>	<b>2,315</b>
- <b>Others - <i>please specify</i></b>				
<b>TOTAL EXPENDITURE</b>		<b>6,772</b>	<b>7,321</b>	<b>8,492</b>

<b>Total expenditure by country - for countries/regions that make up 5 percent or more of total expenditure</b> <u>Please list countries and provide total expenditure for each one</u> <i>Thereof Projects in/for Africa &amp; Middle East</i> <i>Asia &amp; Pacific</i> <i>Europe &amp; Central Asia</i> <i>Americas</i>			
	1,323	1,023	1,173
	749	962	696
	1,086	1,127	812
	602	704	966
<b>Reserves</b>	<b>1,056</b>	<b>1,885</b>	<b>2,486</b>
<b>Significant changes during the reporting period regarding size, structure, or ownership of both liquid and property reserves including</b> - the location of operations, including opening of new offices, starting new major activities, and closings - legal status or ownership - global structure and governance			

## 2. Compliance with the principles of the INGO Accountability Charter

### Respect for Universal Principles

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
1	Vision, mission, values and key documents position the organisation's work in the context of	The organisation's statutes and key programmatic documents.	○ Fully	

	universal principles and relevant (e.g. UN) documents			
2	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has been working in line with Universal Principles and that it has resolved any formal written complaints ( <i>formal written complaints: either in email or letter through mail or in person with contactable complainant's correspondence. All formal complaints to be acknowledged within 1 month of receipt and complaints resolved within 6 months of receipt</i> ) it may have received concerning its alleged breach of these Principles.	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

## Independence

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
3	<ul style="list-style-type: none"> <li>- Organisation receives less than 50% from one single source;</li> <li>- Organisation is not owned/controlled by government, political party or business</li> </ul>	Documentation on <ul style="list-style-type: none"> <li>- ownership and</li> <li>- income</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

## Responsible Advocacy

	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
4	<p>The organisation has written policies ensuring that its public policy positions and advocacy are</p> <ul style="list-style-type: none"> <li>- in line with its mission</li> <li>- accurate and</li> <li>- conform with applicable national law</li> </ul>	<p>The organisation's written advocacy policies</p> <ul style="list-style-type: none"> <li>- describe the criteria or circumstances in which it will involve itself;</li> <li>- define the process for adopting and implementing its positions, involving partners, experts and other parties as appropriate;</li> <li>- contain due diligence provisions and sign off procedures ensuring legal compliance and avoiding unfair or irresponsible public criticism and undue harm to third parties.</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	
5	<p>The organisation's practice fully complies with its policies.</p>	<p>The organisation confirms for the reporting period that it has not been in breach of its own advocacy policies and that it has resolved any formal written complaint it may have received concerning its alleged breach of these policies.</p>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

## Effective Programmes

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
6	The organisation's programmes are conducted in genuine partnership with local communities.	The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes strengthen self-reliance, self-help and popular participation by empowering individuals and communities and building capacities of local structures.	○ Fully	
7	The organisation's programmes aim for sustainable development.	The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes <ul style="list-style-type: none"> <li>- are based on the potential of local resources to sustain the activity</li> <li>- contribute to further strengthening sustainability at local level and</li> <li>- do not create or increase dependence on external support.</li> </ul>	○ Fully	
8	The organisation's programmes are appropriate for the local needs and conditions.	The organisation's written programme strategy, evaluations of terminated and ongoing programmes and other relevant documents provide evidence that the organisation's programmes <ul style="list-style-type: none"> <li>- take relevant local conditions into account, e.g. by involving local</li> </ul>	○ Fully	



		<p>stakeholders in all stages of programme design and implementation</p> <ul style="list-style-type: none"> <li>- take appropriate care of relevant local gender, diversity, cultural and religious issues;</li> <li>- avoid negative environmental impact and, where possible, secure a positive impact.</li> </ul>		
	Funds raised for specific programmes reach the people or cause in whose name they were raised.	The organisation's fundraising and donor information materials, donor communication, programme reports and relevant finance statements provide evidence that funds raised for a specific cause have been used to further that cause.	○ Fully	
9	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has not been in breach of its own programme policies and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies.	○ Fully	

## Non-Discrimination

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
10	The organisation promotes diversity, gender equity and balance, impartiality and non-discrimination in all activities, both internal and external.	<ul style="list-style-type: none"> <li>- The organisation's written non-discrimination policy affirming its commitment to gender equity, to non-discrimination for sexual orientation, to ethnic and racial diversity, to the inclusion of people with disabilities at staff and board levels;</li> <li>- The organization's plans and operations which fully reflect the non-discrimination policy;</li> <li>- The organisation's most recent personnel orientations, trainings and instructional material addressing non-discrimination.</li> </ul>	<ul style="list-style-type: none"> <li>○ Partially</li> </ul>	<p>1) Non-discrimination is firmly anchored in TI's culture and policy documents and our Board Candidate Nomination policy explicitly promotes diversity. As a result the Board for example is very culturally diverse. At the same time, affirmative action is not actively pursued in TI through set quotas.</p> <p>2) Personnel orientations, will address non-discrimination more explicitly.</p>
11	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of cases where it may have been in breach of its own non-discrimination policy and that it has resolved any formal written complaints it may have received concerning its alleged breach of these policies.	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

## Transparency

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
12	The organisation is open, transparent and honest about its structures, mission, policies and activities.	<ul style="list-style-type: none"> <li>- The organisation's reports which adhere to generally accepted standards of technical accuracy and honesty in presenting and interpreting data and research;</li> <li>- The organisation complies with relevant governance, financial accounting and reporting requirements in the countries where it is based and operates.</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	
13	The organisation reports publicly at least once a year about its activities and achievements.	<p>The organisation's annual report which contains:</p> <ul style="list-style-type: none"> <li>- Mission and values;</li> <li>- Objectives and outcomes achieved in programme and advocacy;</li> <li>- Environmental impact;</li> <li>- Human rights impact;</li> <li>- Governance structure and processes, and main office bearers;</li> <li>- Main sources of funding from corporations, foundations, governments, and individuals;</li> <li>- Financial performance;</li> <li>- Compliance with the INGO Accountability Charter and</li> </ul>	<ul style="list-style-type: none"> <li>○ not fully</li> </ul>	<p>The organisation's annual report does not yet contain:</p> <ul style="list-style-type: none"> <li>- Exhaustive reporting on Objectives and outcomes achieved in programme and advocacy;</li> <li>- Environmental impact;</li> <li>- Human rights impact;</li> <li>- Compliance with the INGO Accountability Charter</li> </ul> <p>The compiled data on these items is reported separately and will be integrated into</p>

		- Contact details.		the Annual Report.
14	The organisation's annual financial report will conform to relevant laws and practices and be audited by a qualified independent public accountant whose statement will accompany the report.	Independently audited annual accounts	○ Fully	
15	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any complaints concerning the accuracy or relevance of its reporting and that it has resolved any formal written complaints it may have received concerning its alleged breach of its reporting provisions.	○ Partially	No complaints have been received but reporting on the Accountability Charter could not be implemented. The reporting standard currently developed is keenly awaited.

### Good Governance

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
16	The organisation has a governing body which has responsibility for the oversight of all aspects of the organisation.	The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures allocate ultimate authority to the organisation's governing body.	○ Fully	

		<p>These documents also state that the governing body</p> <ul style="list-style-type: none"> <li>- selects, supervises and evaluates the chief executive,</li> <li>- oversees programme and budgetary matters</li> <li>- defines the overall strategy, consistent with the organisational mission,</li> <li>- verifies that resources are used efficiently and appropriately,</li> <li>- ensures that performance is measured,</li> <li>- secures financial integrity and</li> <li>- makes sure that public trust is maintained.</li> </ul> <p>Documentation on the activities of the governing body shows that all the above tasks have been undertaken thoroughly and successfully.</p>		
17	The work of the organisation's governing body takes place in a clearly defined framework of rules and procedures covering the appointment, responsibilities and terms of members of the governing body.	<p>The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures</p> <ul style="list-style-type: none"> <li>- identify required qualifications and expertise of the members of the governing body and the mix of skills across the group</li> <li>- specify the frequency of meetings of the governing body (at least two meetings per year),</li> </ul>	○ Fully	

		<ul style="list-style-type: none"> <li>- specify adequate attendance by directors (at least a majority of <i>directors</i> on average), and</li> <li>- lay down voting requirements</li> <li>- provide a process for evaluating the governance body's own performance.</li> </ul> <p>Records of the meetings provide evidence that meetings were held and which decisions were taken.</p> <p>A regular general meeting takes place with authority to appoint and replace members of the governing body.</p>		
18	The organisation tries to prevent and, if they occur, actively manages conflicts of interest.	<p>The organisation's bylaws, terms of reference for the governing body, and relevant policies and procedures require that members of the governing body and employees:</p> <ul style="list-style-type: none"> <li>- disclose any affiliation they have with an actual or potential supplier of goods and services, recipient of grant funds, or organisation with competing or conflicting objectives;</li> <li>- absent themselves from discussion and abstain from voting or otherwise participating in a decision on any issue in which</li> </ul>	<ul style="list-style-type: none"> <li>o Fully</li> </ul>	

		<p>there is a conflict of interest; and</p> <ul style="list-style-type: none"> <li>- refuse large or otherwise inappropriate gifts for personal use.</li> </ul>		
19	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any irregularities in its governance system and that it has resolved any formal written complaints it may have received concerning its governance system or members of its governing body.	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

### Ethical Fundraising

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
20	In accepting funds the organisation ensures that it complies with its own ethical standards.	The organisation's written policy for accepting or refusing certain donations and subsidies clearly states which sources of funding are not acceptable to the organisation for ethical reasons.	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	
21	The organisation respects the rights and wishes of donors.	<p>The organisation's written policy confirms donors' rights</p> <ul style="list-style-type: none"> <li>- to be informed about causes for which the organisation is fundraising;</li> </ul>	<ul style="list-style-type: none"> <li>○ Partially</li> </ul>	All of TI's fundraising and donor information materials and donor communication are complying with donors' rights.

		<ul style="list-style-type: none"> <li>- to be informed about how their donation is being used;</li> <li>- to have their names deleted from mailing lists;</li> <li>- to be informed of the status and authority of fundraisers and</li> <li>- to anonymity except in cases where the size of their donation is such that it might be relevant to the organisation's independence and</li> <li>- that donations accepted for a specific purpose, are used for that purpose.</li> </ul> <p>The organisation's fundraising and donor information materials and donor communication are complying with donors' rights.</p>		<p>TI receives 99.5% of its income from institutional donors with whom formal contracts are agreed upon. These satisfy and typically go beyond the requirements as listed in confirming donor rights.</p> <p>TI's present Donations Policy reflects its income structure and is therefore focussed mainly on risk mitigation. As we broaden our income base, new policy tools are being developed in order to address such imperatives.</p>
22	In raising funds, the organisation accurately describes its activities and needs. It uses donations in line with the information and assurances given to the donor.	<p>The organisation's fundraising materials and communication</p> <ul style="list-style-type: none"> <li>- show how the donation will further the organisation's mission;</li> <li>- neither minimise nor overstate the size or urgency of the challenge the organisation wants to address;</li> <li>- do not contain any material omissions or exaggerations of facts, misleading photographs, nor create a false impression or misunderstanding;</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	



		<ul style="list-style-type: none"> <li>- show how organisation will handle any shortfall or excess of income raised for a specific project.</li> </ul> <p>The organisation's donor information materials and communication provide detailed documentation on the use of donations.</p> <p>Follow-up with donors about clarity and quality of materials sent to them shows that the organisation's intended message is accurately getting through.</p>		
23	The organisation records and publishes details of all major institutional gifts and gifts-in-kind clearly describing the valuation and auditing methods used.	<p>The organisation's written gifts-in-kind policy</p> <ul style="list-style-type: none"> <li>- states under which conditions and for which purposes gifts-in-kind are being accepted;</li> <li>- provides clear parameters for valuation and auditing of gifts-in-kind.</li> </ul> <p>The organisation's documentation of all major institutional gifts and gifts-in-kind is complete and up-to-date.</p>	<ul style="list-style-type: none"> <li>○ Partially</li> </ul>	<p>The organisation's documentation of all major institutional gifts and gifts-in-kind is complete and up-to-date. Gifts-in-kind are governed by TI-S Donation Policy but with no explicit provisions on valuation and auditing.</p> <p>In practice, TI is subject to the relevant German laws, rules and regulations followed by its independent financial auditors. Law.</p>
24	The organisation ensures that donations sought	The organisation's policy for the use of agents or other third parties for	<ul style="list-style-type: none"> <li>○ Not applicable</li> </ul>	TI does not employ or commission third parties for

	indirectly, such as through third parties, are solicited and received in full conformity with its own practices.	fundraising purposes states <ul style="list-style-type: none"> <li>- that contracts between the organisation and a third party will be in writing and</li> <li>- that these contracts will oblige the third party to comply fully with the organisation's fundraising policy and ethical standards.</li> </ul>		its fundraising.
25	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its fundraising and related policies and that it has resolved any formal written complaints it may have received concerning its own or its agents' fundraising materials and practice.	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

### Professional Management

No.	Best Practice	Evidence	Compliance	Action Plan if not/not fully in Compliance
26	The organisation's management is professional and effective and the organisation's policies and procedures seek to promote excellence in all respects.	The organisation's written management terms and conditions, policies and procedures contain <ul style="list-style-type: none"> <li>- job specifications and personnel profiles for the CEO and Senior Management Team positions</li> <li>- annual work plans for the CEO and</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	

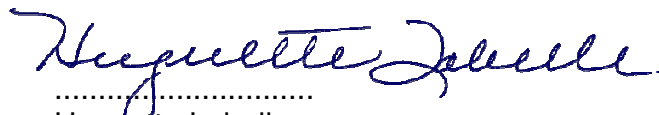
		<p>the Senior Management Team directly referring to the organisation's strategy</p> <ul style="list-style-type: none"> <li>- an appraisal system with the CEO being appraised by the governing body.</li> </ul> <p>The organisation's strategy and key policies lay down clear objectives and criteria defining excellence.</p>		
27	Financial management and control ensure that all funds are effectively used and minimise the risk of funds being misused.	<p>The organisation operates according to a budget approved by its governing body.</p> <p>The organisation exercises adequate internal controls over disbursements to avoid unauthorised payments, prohibiting any un-auditable transactions or loans to members of its governing body or staff.</p> <p>The organisation's annual, audited financial statements</p> <ul style="list-style-type: none"> <li>- are produced by a certified public accountant;</li> <li>- presented timely (normally not later than 6 months after the end of the financial year) and in line with the organisation's written finance policy;</li> <li>- comply with nationally accepted</li> </ul>	<ul style="list-style-type: none"> <li>o Fully</li> </ul>	

		accounting standards and legal requirements.		
28	The organisation has evaluation procedures for its governing body, staff, programmes and projects and conducts monitoring and evaluation on the basis of mutual accountability.	<p>The organisation incorporates appropriate monitoring and evaluation practices in all relevant policies and systems establishing mutual accountability as part of its culture.</p> <p>The organisation conducts regular and deliberate evaluative activities to examine progress towards its goals and mission; and applies in its budget and work plans adequate financial and human resources for monitoring and evaluation.</p>	○ Fully	
29	The organisation ensures that its partners meet the highest standards of probity and accountability.	<p>In its policies guiding the selection of and cooperation with partners the organisation</p> <ul style="list-style-type: none"> <li>- identifies adequate criteria for the selection of effective, legitimate and reliable partners;</li> <li>- takes adequate provisions to exclude links with organisations or individuals involved in illegal or unethical practice.</li> </ul>	○ Fully	
30	The organisation recognises the crucial role the quality and dedication of its staff play in the success of its work and is	<p>The organisation's written human resources policies and procedures</p> <ul style="list-style-type: none"> <li>- conform fully with relevant international and national labour regulations;</li> </ul>	○ Fully	

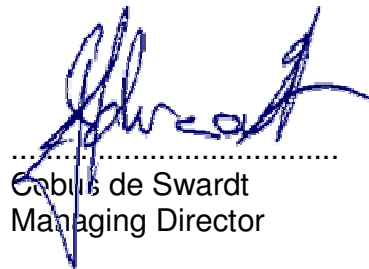
	committed to investing in human resource development.	<ul style="list-style-type: none"> <li>- provide for remuneration and benefits levels which strike a balance between public expectations of not-for-profit organisations and the need to attract and retain the staff the organisation needs to fulfil its mission;</li> <li>- apply the best voluntary sector practices in terms of employee and volunteer rights and health and safety at work.</li> <li>- include procedures for evaluating the performance of all staff on a regular basis.</li> </ul>		
31	The organisation takes all required provisions to exclude corruption and bribery from its work.	<p>The organisation's relevant policies</p> <ul style="list-style-type: none"> <li>- specifically prohibit acts of bribery or corruption by staff or other persons working for, or on behalf of, the organisation;</li> <li>- identify appropriate steps to be undertaken in cases of suspected bribery or corruption.</li> </ul>	<ul style="list-style-type: none"> <li>○ Fully</li> </ul>	
32	The organisation respects sexual integrity in all its programmes and activities, and prohibits gender harassment, sexual exploitation and discrimination.	<p>The organisation's relevant policies contain appropriate provisions</p> <ul style="list-style-type: none"> <li>- preventing sexual exploitation, abuse;</li> <li>- ensuring gender equality;</li> <li>- preventing discrimination in all its forms;</li> <li>- fostering ethnic and racial</li> </ul>	<ul style="list-style-type: none"> <li>○ Partially</li> </ul>	TI-S policies do provide for respect sexual integrity in all its programmes and activities, and prohibits gender harassment, sexual exploitation and discrimination. While it prevents discrimination, it

		diversity. -		does not actively seek diversity on the basis of specific quotas.
33	The organisation provides internal feed-back mechanisms making sure that the organisation consistently stays within its ethical and legal framework and follows its mission.	The organisation's written whistle-blowing policy enables and encourages staff to draw management's attention to activities that may not comply with the law or the organisation's mission and commitments, including the provisions of the INGO Accountability Charter.	○ Fully	
34	The organisation's practice fully complies with its policies.	The organisation confirms for the reporting period that it has no knowledge of any significant breaches of its management policies or related policies and procedures and that it has resolved any formal written complaints it may have received concerning its management provisions and practice.	○ Fully	

Date....23 December 2008.....



Huguette Labelle  
Chair of the Board



Gabris de Swardt  
Managing Director