

[Company Letterhead]

Date: [Insert Date]

To: [Insert Name of Compliance Committee/Management]

From: [Insert Name of Legal Counsel/Compliance Officer]

Subject: Anti-Corruption Risk Opinion: [Insert Name of Third-Party Intermediary]

1. Introduction

This opinion evaluates the corruption risks associated with engaging [Insert Name of Third-Party Intermediary] ("Intermediary") to provide [Insert Brief Description of Services] in [Insert Country/Region]. This assessment is based on the requirements of the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and [Insert Other Relevant Local Laws].

2. Due Diligence Summary

We have completed a due diligence review which included:

- Verification of corporate registration and ownership structure.
- Screening against global sanctions, watchlists, and Politically Exposed Person (PEP) databases.
- Review of the Intermediary's internal anti-corruption policies and training programs.
- Verification of professional references and reputation in the local market.

3. Identified Risk Factors

[Select or modify as applicable:]

- **Geographic Risk:** The Intermediary operates in a jurisdiction with a high Transparency International CPI ranking.
- **Government Interaction:** The scope of work requires frequent interaction with [Insert Government Agency].
- **Red Flags:** [List any specific red flags identified during diligence or state "None identified"].

4. Risk Mitigation Measures

To address the risks identified above, the following controls have been implemented:

- Inclusion of standard anti-corruption representations and audit rights in the contract.
- Requirement for the Intermediary to provide annual certifications of compliance.

- Staged payment structures based on verifiable milestones.

5. Legal Opinion

Based on the information reviewed, it is our opinion that the risk of corruption associated with this Intermediary is [Low / Medium / High]. Provided that the mitigation measures outlined in Section 4 are strictly followed, the engagement of the Intermediary does not appear to violate [Insert Company Name]'s Anti-Corruption Policy or applicable international anti-bribery laws.

6. Conclusion

[Select one:]

☐ Approved for engagement.

☐ Approved for engagement subject to the following conditions: [Insert Conditions].

☐ Not approved for engagement.

Signature: _____

Name: [Insert Name]

Title: [Insert Title]