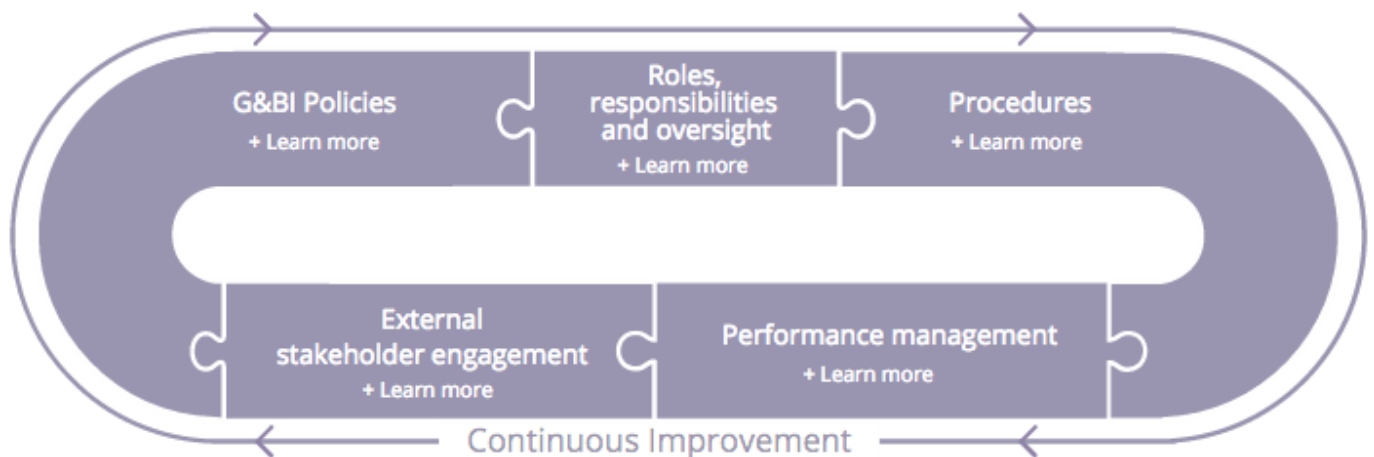


# GOVERNANCE AND BUSINESS INTEGRITY MANAGEMENT SYSTEMS



## Introduction

All funds need to have a governance and business integrity management system (GBIMS) commensurate with the level of governance, business integrity and compliance (G&BI) risk, and the impacts of those risks associated with current and potential portfolio companies. The GBIMS will need to take into account the fund manager's capacity and structure. It should be noted that GBIMS is more than a set of documents. It is the way in which a fund manager ensures that ESG aspects are well managed. The documents are just a part of the fund management system.

This section provides guidance on designing and implementing a GBIMS.

In this section, and throughout the CDC Toolkit for Fund Managers G&BI covers:

- [Corporate governance](#) practices.
- [Anti-corruption](#) policies and procedures.
- [Whistleblower](#) policies and procedures.
- Compliance policies and practices, particularly [Anti-money laundering](#), Know Your Customer (KYC) and [sanctions](#).

A fund's GBIMS should include the following key elements:













































