

Seaway7 Compliance and Ethics Programme Principles

	PRINCIPLES	PROCEDURES	EFFECTIVE IMPLEMENTATION
1	Top Level Commitment	<ul style="list-style-type: none"> • Board responsibility for the anti-corruption programme • Compliance Officer/Function 	
2	Risk Assessment	<ul style="list-style-type: none"> • Enterprise risks • Country risks • Sector, market and work-type risks • Project- and transaction-specific risks • Third party risks: Intermediaries, supply chain, business partners and others 	
3	Clear Policies	<ul style="list-style-type: none"> • Code of Conduct • Anti-Corruption Policy incl. Facilitation Payments • Gifts and Hospitality • Conflicts of Interest • Political, Charitable and Community Support • Other high-risk areas 	
4	Communication, Education and Training	<ul style="list-style-type: none"> • Internal communication • Education and training • "Whistle-blowing" channels • External communication (business partners, supply chain and other stakeholders) 	
5	Procedures and Controls	<ul style="list-style-type: none"> • Employment procedures • Decision-making and approval processes • Financial controls • Tender controls • Supply Chain Management controls • Anti-corruption contract terms • Due diligence 	
6	Monitoring, Enforcement and Review	<ul style="list-style-type: none"> • Detection and testing (incl. Auditing and Monitoring) • Investigation and corrective action • Measurement and reporting • Keeping records • Continual improvement 	
7	CULTURE AND VALUES		