

TACKLING MARITIME CORRUPTION



Best Practice Guide for Staff



COMMON ISSUES in countries prone to corruption

In many ports, Captains face a lack of transparency around fees and fines. Further, demands for petty corruption such as facilitation payments are common. In these locations, port calls can be stressful for the crew. This guide provides advice for the Captain and crew in countries where the risk of corrupt demands is high.

SAFETY ALWAYS COMES FIRST!

Never put **yourself, your crew, or your ship in danger**, but escalate and report these situations internally afterwards.



STEP 1: PREVENT CORRUPT DEMANDS



Plan in Advance—Avoid last minute requests

- ✓ Double check all documentation in advance.
- ✓ Submit documentation electronically when possible.
- ✓ Have all relevant documentation in order and have it ready when meeting with the government officials.
- ✓ Include as much lead time as possible when planning actions that require government interaction.
- ✓ It is also important to be prepared operationally:
 - **Discharge expired medicine.** It may be difficult to discharge medicine in some ports. Seek guidance from Operations on where to best discharge expired medicine prior to calling ports where you know expired medicine might be an issue.
 - **Check all medicine lists** to ensure they reflect the actual medical supply.
 - **Check individual crew members' paperwork,** and escalate directly to your Crew operator if the paperwork is not in order. This may include crew visas, yellow fever certificates, employment contracts, etc.
- ✓ Seek information from the agent on how official payments (fees, fines) should be paid before engaging in dialogue with government officials—this will help you to avoid cash transactions. You also show that you are aware of local requirements.
- ✓ Where possible, your company's local manager or agents should engage in dialogue with local authorities, informing them about your company's anti-corruption policy. This action can prevent a demand later.
- ✓ Inform the agent in advance of your company's anti-corruption policy, and of the fact that third parties acting on your company's behalf must enforce the same rules.
- ✓ Have anti-corruption signs clearly visible for visitors (at the gangway and in the office).
- ✓ Collect data on corrupt demands. Share these internally.
- ✓ If relevant, check the charterer's instruction on corruption, and especially on facilitation payments.
- ✓ In ports prone to corruption, assess if it is relevant to have a P&I club representative or protective agent onboard when meeting with authorities.

STEP 2: REJECT CORRUPT DEMANDS



Remain Calm & Polite—Try to Keep Cool!

- ✓ Your social skills, intelligence, and leadership are important tools in the interactions with government officials.
- ✓ Be respectful. For example, it is okay to offer general hospitality, such as refreshments while the government officials sign relevant documentation.
- ✓ Don't reply with only a "NO"—explain through positive wording with the aim of coming to a mutual understanding on what can and can't be done.
- ✓ Explain your company's anti-corruption policy—including that you record all form of payments and gifts.
- ✓ Show your company's anti-corruption policy and the MACN logo.
- ✓ If the government official is asking for a bribe, ask to escalate to the person's manager.
- ✓ Always ask for an official fine with an official letterhead if you are asked to pay for any noncompliance issue.
- ✓ Be clear that you can pay the fine but that your company requires that you do so to the government office—not to individual government officials.
- ✓ Never pay anything to decrease an official fine or penalty.
- ✓ Insist that the government official needs to sign a receipt for anything given by the Master or frontline staff.
- ✓ Wear formal dress when meeting government officials e.g. Captain's uniform.

STEP 3: ELIMINATE CORRUPT DEMANDS



Stand Your Ground!

- ✓ Use the lessons learned and be consistent in the rejection of corrupt demands.
- ✓ If one vessel successfully reduced or eliminated demands, share the experience so sister ships can follow. If you are successful once, it is likely that the success can continue.
- ✓ Share information data and performance on how the mitigation of corrupt demands is progressing—among ships, in the office, and among offices in the same geographical region.
- ✓ Prepare new colleagues on what to expect before the first government official interaction in a specific location.
- ✓ Use local experience and input to design specific elimination plans e.g. seek input from agents on the best way to eliminate corrupt demands, or facilitate a dialogue with local third parties on how to combat corrupt demands jointly.