EJSM Partners’ Transparency and Good Governance Policies

*Checklist*

Versioning

| **Date** | **By** | **Modification Description** | **Approved** |
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# Methodology

This checklist is divided into four sections;

1. code of conduct,
2. conflict of interest,
3. anti-fraud and anti-corruption, and
4. implementation and reporting.

The sections elements are in line with main best practice. A review for each of the EJSM partner standing was done to determine compliance or lack-off for each element within the various sections. The relevant elements have been bolded meaning they are “***essential***”, meanwhile the others are “*recommended*” but not very important.

| ***Code of Conduct*** | partner | 1 | 2 | 3 | 4 | 5 | **Comments** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| ***Believes in employee dignity*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Promote sound working environment* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Segregation of duty*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Identify responsibility* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Act in good faith, care, competence* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Act per applicable regulation* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Dedicate time and attention to tasks*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Transactions done per regulations*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Transactions done per authorization*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Comply with health & safety working conditions* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Respect employee private life* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Respect to personal, political, cultural engagements of employees*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Freedom of employee to speech & opinion* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Equal opportunity*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Prohibits discrimination*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Encourage information sharing and dialogue* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Respect to confidential information and IP rights*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Harassment* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |

| ***Conflict of Interest*** | Partner | 1 | 2 | 3 | 4 | 5 | **Comments** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| *Nepotism (some are family run and this should not apply)* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Self-dealing*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Conflicting responsibilities* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Avoiding Conflict of Interest* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Do not accept gifts related to conducting work* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Official hospitality* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Favoritism* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Other employability & activities*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Use of assets / property officially*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Non-disclosure of confidential information*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |

| ***Anti-Fraud & Anti-Corruption Policy*** | Partner | 1 | 2 | 3 | 4 | 5 | **Comments** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| ***Theft/Abuse of equipment, assets, equipment*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***False invoicing*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Misappropriating & misuse of funds & credit cards* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Misuse of position* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Fraudulent tendering*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Misstatement of accounting information*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Overcharging for services* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Tax evasion* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Money laundering* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| *Theft of IP rights* | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Falsification of financial statements*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Reframe from receiving or paying bribes*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |

| ***Implementation and reporting*** | Partner | 1 | 2 | 3 | 4 | 5 | **Comments** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| ***Appoint a representative who ensures implementation and adherence*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Set reporting system for info on violation or unethical practice*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Investigate allegation and take action*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Risk assessment*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |
| ***Audit*** | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |  |