



• MARINE  
CONTRACTORS

## 8. GOVERNMENT OFFICIALS

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At HMC, we endorse internal and external rules that safeguard a responsible way of working. As an HMC employee, you also carry this responsibility. You are therefore expected to act in line with our policies and applicable anti-corruption laws.



### Who is a government official?

A government official is anyone employed at or acting on behalf of, amongst others:

- a government department.
- a company under government ownership or control.
- a public international organization (e.g. the World-Bank or IMF).
- political parties, party officials or candidates.

Corruption could possibly occur when dealing with government officials. They are entrusted with power that could potentially be misused, power that normal citizens do not have. At HMC we regularly need to work with government officials, but what are the cases in which we need to pay attention?

Have you ever paid a customs officer to speed up a process at the airport? Or have you ever paid a foreign police officer to get out of paying a fine?

The term 'government official' is broadly interpreted. If you are ever in doubt about whether someone is considered a government official, contact the Ethics & Compliance department.

## EXAMPLES

### Examples of corrupt behaviour relating to government officials

- A customs officer asks extra payment to import equipment in addition to the normal import fees.
- A traffic officer gives you a fine even though you did not commit an offense.
- A person working for a state-owned oil company asks you for money in exchange for information.
- You promise money to a high ranked official of the Ministry of Oil in order to obtain a contract.
- An agent acting on behalf of HMC pays money to an official at the harbor in order to clear equipment through customs.

### Points of attention

The following is a list of possible warning signals that may arise during the course of your work. The list is not intended to be exhaustive and is for illustrative purposes only.

#### Pay special attention when:

- Government officials require payments in cash.
- You are required to pay fee or commission payments for no apparent reason.
- You are accused of a violation that you did not commit.
- A government official refuses to provide you with an invoice or receipt for a payment made.
- You travel to a country which is perceived to be highly corrupt.
- A third party has a reputation for paying bribes or for having a “special relationship” with government officials.

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# KEY TAKEAWAYS

- Participate in anti-corruption training as determined by the Ethics & Compliance department and understand the risks you face at work.
- As a general principle, avoid providing anything of value to government officials or their family members.
- When receiving any documents or visas, make sure the details are correct.
- Make sure you are well prepared before travel, for instance by checking the expiry dates of your documents.
- Make sure you know who to contact when there is a problem and a payment is requested.
- There may be circumstances where you feel threatened for your life, health, safety or illegal detention. If you are forced to pay, this will not result in retaliation from HMC; however, you need to immediately report this to the Ethics & Compliance department.
- Please note that failure to comply with this policy can be reason for disciplinary action.

## What does this mean for third parties?

At HMC, we want to make sure third parties are reputable, capable and commercially reliable companies. Therefore:

- We expect all our business partners to act in line with our government officials policy and applicable laws.
- We conduct background searches and make sure we know our business partners before engaging in a business relationship.
- If we feel it is necessary, we monitor their behavior and end our relationship with any third party who fails to comply with this policy.

## Do you have any questions about this topic?

We encourage you to contact the Ethics & Compliance department. The contact details can be found on the Ethics & Compliance intranet site.

## Speak up!

If you suspect misconduct, please take a look at the Reporting Policy to see what you can do.