

## Prospective Signatory Integrity Pact Checklist

Kindly circle or highlight that of which applies to your company.

### **Principle 1**

*We will maintain channels by which employees and other stakeholders can raise ethical concerns and report suspicious circumstances in confidence without risk of retaliation, and investigations will be conducted on all reports received in good faith.*

- YES / NO** Does your company have a means for staff to report their concerns?  
**YES / NO** Has your company received reports on ethical or behavioral matters raised by staff?  
**YES / NO** Does your company have dedicated resources to advise on staff's questions or concerns?  
**YES / NO** Does your company have a way of managing/investigating concerns raised by staff?  
**YES / NO** Does your company have a policy on non-retaliation?  
**YES / NO** Has your company terminated the employment of any staff for reasons of non-compliance?

### **Principle 2**

*We will maintain a Code of Conduct to guide our employees towards ethical and accountable behaviours at all times, and will apply appropriate consequence management for violations of the Code.*

- YES / NO** Does your company have and maintain a Code of Conduct?  
**YES / NO** Does your company have policies on core values or business ethics?  
*If YES, kindly support by providing evidence.*

### **Principle 3**

*We will expect our business partners to acknowledge and adhere to our Code of Conduct and business principles when executing work on our behalf, which will be reflected in our contract terms and conditions.*

- YES / NO** When contracting with business partners, do your contracts contain clauses relating to business ethics (e.g anti-corruption laws)?  
**YES / NO** Does your company conduct monitoring activities to ensure that business partners conduct themselves in accordance with ethical business principles?  
**YES / NO** Does your company communicate on business ethics/integrity to your business partners?  
*If YES, kindly support by providing evidence.*

#### **Principle 4**

*We will provide communications and training for staff to ensure strengthened knowledge and awareness that promotes integrity, honesty, and accountability in the exercise of their duties and responsibilities.*

**YES / NO** Does your company's employment contract for staff contain any clauses on behavioural expectations or business ethics?

**YES / NO** Does your company communicate or train staff on business integrity or ethics?

**YES / NO** Does your company have a dedicated resource to provide training for staff?

*If YES, kindly support by providing evidence.*

#### **Principle 5**

*We will require our staff and business partners to disclose and declare any conflicts of interest, in order to take appropriate actions to avoid compromising the integrity and fairness of our business decisions.*

**YES / NO** Does your company have a policy on conflicts of interest?

**YES / NO** Does your company have any tools/resources available for staff to disclose conflicts of interest?

**YES / NO** Does your company address conflicts of interest declared by staff?

*If YES, kindly support by providing evidence.*

#### **Principle 6**

*We will not offer or accept Gifts and Hospitality that could be perceived to influence business decisions or processes, and will prohibit our staff and business partners from doing so.*

**YES / NO** Does your company have a policy on Gifts and Hospitality?

**YES / NO** Does your company have any tools/resources available for staff to disclose any offering or receiving of Gifts or Hospitality?

*If YES, kindly support by providing evidence.*

#### **Principle 7**

*We will implement appropriate internal controls to prevent unethical conduct by our employees, ensure good governance, and institutionalize the values of integrity and accountability in our business.*

**YES / NO** Does your company have a governance structure that segregates the duties of respective individuals (e.g Manual of Authorities)?

**YES / NO** Does an external party conduct audit on your company's controls and processes?

**YES / NO** Does your company train your staff to make them aware of the company's policies on the governance structure?

**YES / NO** Does your company have a documented records management system or process for the safekeeping of company records/documents? (i.e financial, employee data, etc)

*If YES, kindly support by providing evidence.*

**Principle 8**

*We will prohibit bribery and facilitation payments in any form in all activities under our control.*

**YES / NO** Does your company have an Anti-Bribery and Corruption policy?

**YES / NO** Are your staff and management trained on the risks involving corruption?

**YES / NO** Is there a dedicated resource to manage the corruption risks for the company?

*If YES, kindly support by providing evidence.*

**Principle 9**

*We will refrain from engaging in business with parties who have demonstrated unethical business practices, and will operate with a zero tolerance policy with regards to violations of the law or our principles.*

**YES / NO** Does your company conduct due diligence checks on their potential business partners?

**YES / NO** Does your company include business ethics/integrity as part of its engagement plan with business partners?

*If YES, kindly support by providing evidence.*

**Principle 10**

*We will cooperate fully with the Government of Brunei and the Anti-Corruption Bureau in their efforts to combat and deter corruption in the country, and realize that those initiatives cannot succeed without collective commitment from the businesses to level the playing field and to build integrity in the business environment.*

**YES / NO** Is the company aware of the Integrity Pact?

**YES / NO** Is the company aware of the Anti-Corruption Bureau and what they do?

**YES / NO** Is the company aware of the recent prosecutions against individuals who violated the corruption laws of Brunei?

**YES / NO** Will the company commit to collectively fight against corruption and maintain an honest, fair and transparent industry?