

# BSJV ETHICS & COMPLIANCE

## Quick Reference Guide



# ETHICS & COMPLIANCE

## WHAT IS MY RESPONSIBILITY?



- Understand the risks in your role and how to manage them
- Seek advice when things are not clear
- Promptly complete the ethics and compliance training assigned to you
- Speak up
- Make sure that any third party contractors, agents or consultants you work with are aware that we are bound by our BSJV Code of Conduct and that they should act accordingly
- It is your duty to report any suspected violations of the Code

## WHEN IN DOUBT, ASK YOURSELF...



- Am I keeping to our core values of 'Honesty, Integrity and Respect For People' ?
- Is what I am doing ethical and in line with BSJV Code of Conduct and Anti-Bribery Management Standard?
- Is it legal and am I authorised to do it?
- Have I thoroughly understood the potential risks to BSJV's reputation?
- Is it the right thing to do and am I leading by example?
- If this becomes public knowledge, will I still feel I have done the right thing?

# ETHICS & COMPLIANCE

## WHEN IN DOUBT, WHOM CAN I REFER TO?



- Your line manager
- Ethics & Compliance Manager
- Human Resources
- Global Helpline:  
Landline / Mobile:  
**800 1111 then +1-800-961-4117**  
Skype: **+1-800-961-4117**  
Report Online:  
**<https://shell.alertline.eu>**

## WHERE CAN I SOURCE MORE INFORMATION?



BSP Internal Website



In-Focus



Business Integrity



- Code of Conduct
- Anti-Bribery Management Standard
- Antitrust/Competition
- Ethical Leadership Guide
- Social Media Guide
- Employee Personal Data Disclosure Rule
- Code of Conduct Register

# ETHICS & COMPLIANCE

“ The level of Ethics and Compliance due diligence required varies, therefore, **IT IS IMPORTANT TO UNDERSTAND THE RULES** which apply in each circumstance and conduct the right E&C Due diligence. ”



## WHEN DO YOU CONDUCT E&C DUE DILIGENCE?

- When contracting with government intermediary, distributor, contractor/supplier and customers – **Integrity Due Diligence**
- Before funding of **social investments, donations and sponsorships**
- When engaging in **new business development** (including acquisition or divestment of an interest or setting up a new joint venture)
- When confirming **trade associations** are appropriate for staff memberships

## MORE INFORMATION ABOUT E&C DUE DILIGENCE



# ANTI-BRIBERY & CORRUPTION



“ BSJV commit to **ZERO TOLERANCE** for corrupt practices. ”

## DO'S & DON'TS



- Everyone involved in BSJV's business **must comply with THE PREVENTION OF CORRUPTION ACT** of Brunei, as well as Anti-Bribery & Corruption Laws that apply across borders.
- Know who you are doing business with by conducting the appropriate due diligence as set out in the Anti-Briber Management Standard.
- You must report corrupt behavior.



- The direct and indirect offer, payment, soliciting and acceptance of bribes or facilitation payments in any form is **unacceptable**.
- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain a business advantage. You must not allow anybody else to do so on your behalf

# CONFLICT OF INTEREST



“ **Conflict of Interest (COI)** may arise when your personal relationships, participation in external activities or an interest in another venture, could influence or be perceived by others to influence your business decisions for BSJV. ”

## DO'S & DON'TS



- Withdraw from decision-making that creates an actual, potential or perceived COI, or could be perceived as creating one
- You must register all actual, potential or perceived COIs in the Code of Conduct Register.
- If you are not sure whether such a conflict exists, you must consult your line manager or Ethics & Compliance Manager.



- You must avoid actual, potential or perceived COIs if possible.
- You must not let any decisions you make at BSJV be influenced by personal considerations such as relationships or outside interests of yourself, family or friends.

# GIFTS & HOSPITALITY

## PROHIBITED LIST



The following items are prohibited and may not be offered or accepted:

- Illegal under local law or under laws with international effect (e.g. US FCPA, UK Bribery Act)
- Cash or cash equivalents
- Loans
- Personal services
- Events/meals where the business partner is absent
- G&H that is or can be linked to important business decisions during sensitive decision periods
- Per diem payments offered as an alternative to gifts, meals, lodging, entertainment or travel-related expenses (unless required by contract or government regulation and/or supported by Ethics & Compliance Manager)

“GIFTS AND HOSPITALITY (G&H) that appear to improperly influence business decisions, create a conflict of interest (COI) or are **ON THE PROHIBITED LIST MUST NOT BE OFFERED OR ACCEPTED.**”



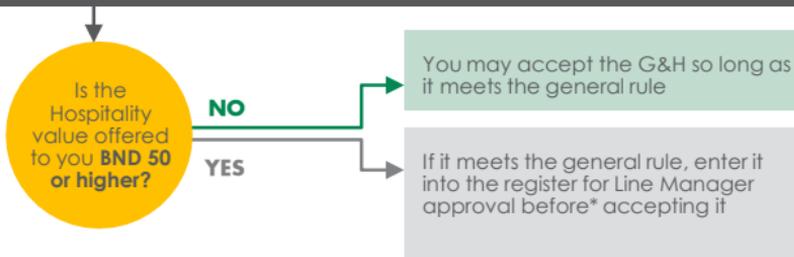
## GENERAL RULE FOR ACCEPTING G&H:

- Always check first against the **main rule** (BSP discourages G&H); can we do without (also if “we have always done this”)?
- **Declare** the G&H into the Code of Conduct (CoC) Register.
- You **CAN** accept an invitation to a Hari Raya/Eid Open House. Please always use your best judgment to assess whether you face any perception risks in doing so.
- You **CAN** accept ‘angpao’s (green packets) of customary value (i.e.  $\leq$ ~\$5) at an Open House. However, should you feel compromised from accepting an angpao, declare it in the CoC Register and donate the money to a charity accordingly.  
**When in doubt, ASK!**
- Taking business partners out to restaurants that they would not normally go to if the meal was to be paid by their employer or by themselves, may well be excessive.
- Make sure it is norm to register in advance in CoC Register, where is not possible immediately after the event.

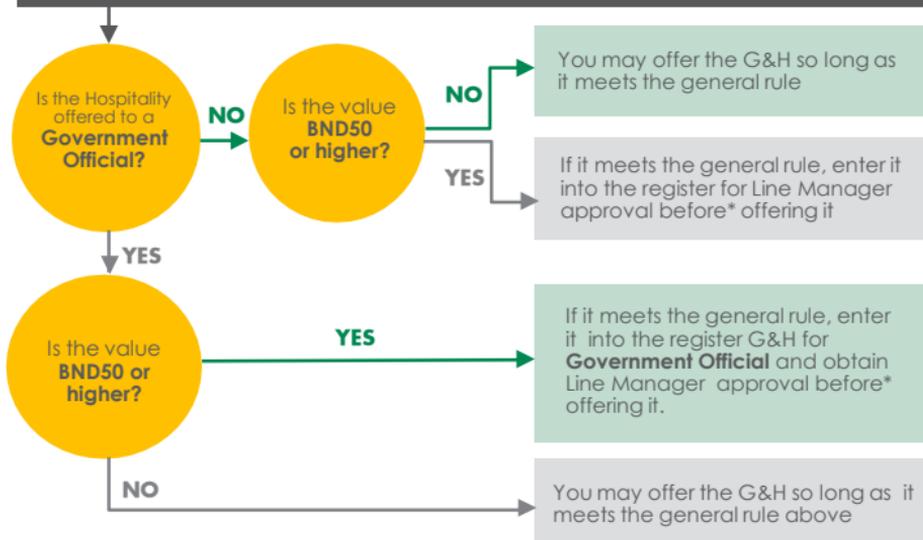
# GIFTS & HOSPITALITY

## VERIFY BEFORE RECEIVING OR OFFERING

### BSJV staff receiving



### BSJV staff offering



\*Where advanced registration/approval is impractical, post registration/approval is required in timely manner.

# HARASSMENT



“ **BSJV WILL NOT TOLERATE HARASSMENT.** ”

We will not tolerate any action, conduct or behaviour which is humiliating, intimidating or hostile.

Treat others with respect and avoid situations that may be perceived as inappropriate. ”

## DO'S & DON'TS



- You must treat others with respect at all times
- Challenge someone if you find their behaviour hostile, intimidating, humiliating or disrespectful



- You must not physically or verbally intimidate or humiliate others.
- You must not make inappropriate jokes or comments
- You must not display offensive or disrespectful material

# CORPORATE CARDS USAGE



You must use your Corporate Card only for approved business expenses.

Examples:

- Airfares;
- Hotel accommodation;
- Travel meals (claim only own meals, not to be extended to family members or friends); transport to business event
- Training courses/Conference/Workshops



It is **unacceptable** to use your Corporate Credit Card for non-business or non-approved expenses.

Examples

- Cash withdrawal;
- Alcoholic drinks;
- Personal purchases (i.e. jewelry, furniture, car installment payment, etc.);
- Hotel room movies, membership charges and other non-business related hotel services.

## GENERAL RULE FOR CORPORATE CARDS USAGE

- For all expenses related to business travel, please follow the **Expense Management Procedure**
- Where expenses are related to entertainment, please ensure you comply with the BSJV's Gifts and Hospitality Rule
- When you are in doubt, please ask and clarify with your Line Manager or Ethics & Compliance Manager

## LINE MANAGER'S ROLE



- Managers must remain vigilant when reviewing expenses of your direct reports in a timely manner
- It is your duty to know the Expense Management Procedure: ignorance is no excuse. BSP is increasing checks on misuse of Corporate Credit Cards. If you know or suspect someone is violating the Code, you have a duty to report it.



## **SPEAK UP**

DO YOU THINK  
SOMETHING MIGHT BE  
UNETHICAL?

### **Global Helpline:**

**Landline / Mobile:** 800-1111 then +1-800-961-4117

**Skype:** +1-800-961-4117

**Report Online:** <https://shell.alertline.eu/gcs/welcome>