

## Anti Corruption Policy

### General

INTSOK's Board of Directors has established this Anti-Corruption Policy that applies to all INTSOK employees, advisors and consultants as well as INTSOK Board members. This policy is an integrated part of the Code of Conduct.

INTSOK's Board of Directors recommends that every INTSOK partner company adopts similar rules as well as other anti-corruption measures in their own organisation.

### INTSOK's attitude to corruption

INTSOK disapproves of corruption and will work actively towards its prevention during the execution of our business. INTSOK employees, advisors and consultants can sometimes be faced with situations where distinguishing between proper and improper conduct is difficult. INTSOK expects all personnel to be active and open in trying to discuss these situations with their colleagues and managers. The final decision on what the INTSOK organisation can accept lies with the Managing Director.

*INTSOK regards any direct or indirect promise of unjustified and undeclared payments or services in order to gain unjustified business or other advantages as unacceptable. INTSOK regards bribes, facilitation payments and trading in influence as corruption. Facilitation payments are relatively minor unjustified and undeclared payments aimed at gaining products or services that one has a right to obtain. INTSOK does not allow such payments. Facilitation payments may in rare and extremely critical situations be accepted. In such instances, approval should be sought, if possible in advance, and payments shall be properly recorded and reported to the Managing Director. Trading in influence exists when an improper advantage is provided to someone in order to influence the performance of a third party's post, office or commission. Such improper advantage can take different forms, for example cash, objects, credits, discounts, travel, accommodation and services. INTSOK staff will always disclose that they are representing INTSOK or an INTSOK partner company.*

### **Oil and Gas Advisors**

*All agreements with advisors and consultants shall be made in writing, and the agreement shall always describe the real relationship between the parties. INTSOK requires all advisors and consultants to act according to the Code of Conduct and this Anti-Corruption Policy. The Code of Conduct and Anti-Corruption Policy shall be included as part of the agreement.*

*Before INTSOK hires an advisor or consultant, INTSOK will verify that his/her reputation, background and integrity are acceptable. Payments shall reflect the services they provide and will only be made against proper documentation. All such payments will be recorded according to good accounting practices.*

### **Training**

*INTSOK will address corruption issues on a regular basis in various ways in order to ensure that INTSOK employees, advisors and consultants are aware of this Anti-Corruption Policy and are motivated to abide by it.*

*INTSOK's employees, advisors and consultants will be made aware of this Anti-Corruption Policy and the Code of Conduct and they will state their compliance in writing. The Anti-Corruption Policy and challenges related to corruption will be addressed in annual employee assessment talks and follow-up talks with advisors.*

### **Risk assessments**

*INTSOK will include a corruption risk assessment in all relevant work processes. INTSOK will strive to have a sound knowledge and understanding of corrupt business practices in all main markets in order to be able to give proper advice to INTSOK Partners on avoiding corruption related problems.*

*Market reports describing opportunities and challenges in a country shall contain a chapter on corruption. Major individual projects related to training and capacity development etc. shall contain an evaluation of corruption risk.*

### **Gifts and other advantages**

INTSOK does not accept giving or receiving gifts or other advantages that are aimed at influencing or promoting decisions in any improper way.

*The combination of value, frequency, time, place and occasion will determine whether a gift or other advantage is acceptable or not. Extra care should be exercised when government officials are involved. If in doubt, your Regional Director or the Managing Director should be consulted and the case documented.*

### **Financial support to international delegates**

INTSOK often arranges seminars and conferences with international speakers and guests. INTSOK may under special circumstances cover all or part of an invitee's travel and hotel expenses. Such costs shall always be approved in advance by the Managing Director and properly documented.

*Extra care should be exercised when government officials are involved. If in doubt, consult your Regional Director or The Managing Director.*

### **Relevant Internet resources**

#### **Corruption:**

- [Lovtekst](#)
- [International Initiative on Corruption and Governance](#)
- [Council of Europe \(Europa-rådet\)](#)
- [Transparency International](#)
- [Transparency International Norway](#)
- [TI Bribe Payers Index](#)
- [UD, Regelverk mot korrupsjon](#)

#### **Money Laundering:**

- [Hvitvaskingsloven \(lovtekst\)](#)
- [Financial Action Task Force \(FATF\)](#)
- [International Money Laundering Information Network \(IMoLIN\)](#)

- [The Anti Money Laundering Network](#)
- [World Money Laundering Report](#)
- [Commercial Crime Services:](#)