

# LIST OF DO'S AND DONT'S



WHILE THESE EXAMPLES ARE NOT EXHAUSTIVE AND ONE MUST ALWAYS USE THEIR COMMON SENSE, THE FOLLOWING EXAMPLES CAN BE USED AS GUIDANCE TO COMPLY WITH HES'S POLICIES.



## DO'S

- ▶ Ask yourself if there is a business need for engaging this Third Party?
- ▶ Familiarise yourself with the Third Party Engagement Policy and Instruction.
- ▶ When dealing with licensing Public Officials, clarify beforehand which licenses and permits are required.
- ▶ Document all payments to Third Parties.



## THIRD PARTY ENGAGEMENTS

### PERMITS & LICENSES

- ▶ Don't ignore Red Flags.
- ▶ Don't solicit or pay a Facilitation Payment.
- ▶ Don't ignore any concerns you might have, but report.
- ▶ Don't issue payments to unofficial accounts and make sure that you always receive official invoices and receipts.

## DONT'S



## ANTI-BRIBARY & CORRUPTION

- ▶ Familiarise yourself with the Anti-Bribery and Corruption Policy and be alert to recognise potential Bribing and Corruption related situations.
- ▶ Refuse invitations for Facilitation Payments.
- ▶ Ask questions on rates and fees to distinguish legitimate payments from Facilitation Payments.
- ▶ Document all payments to Public Officials and Third Parties.
- ▶ Report potential or suspected breaches to the local compliance officer or the Chief Compliance Officer.

- ▶ Don't solicit or accept any form of Bribery or pay a Facilitation Payment.
- ▶ Don't underestimate the risk or the likelihood of being confronted with Bribery and/or Corruption.
- ▶ Don't ignore any concerns you might have, but report.
- ▶ Don't refuse to pay if your or someone's life or loss of liberty is at stake.
- ▶ Don't perform any payment without proper contract or purchase order, invoice or receipt.

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## DO'S

- ▶ Familiarise yourself with the Anti-Money Laundering Policy and be alert to recognise potential money laundering related situations.
- ▶ Document all payments to Third Parties.
- ▶ If faced with a request for an improper payment, you should always resist and escalate according the applicable policy.

### ANTI-MONEY LAUNDERING PERMITS & LICENSES



## DONT'S

- ▶ Don't ignore any concerns you might have, but report.
- ▶ Don't solicit or accept any form of bribe from any person.
- ▶ Don't underestimate the risk or the likelihood of being confronted with Bribery and/or Corruption.

### GIFTS & HOSPITALITY



- ▶ Familiarise yourself with the Gifts and Hospitality Policy and be alert to recognise potential money laundering related situations.
- ▶ Only host meetings at locations where there is a genuine business justification.
- ▶ Pay special attention when dealing with Public Officials.
- ▶ Only include persons whose presence is relevant for a business purpose.
- ▶ Only offer travel and hospitality for the period needed and at the level applicable to the participating employees.

- ▶ Don't ignore any concerns you might have, but report.
- ▶ Don't solicit or accept any form of bribe from any person.
- ▶ Don't underestimate the risk or the likelihood of being confronted with Bribery and/or Corruption.