SONARA

OCTOBER 2015

AMBASSADORS OF ETHICS TRAINING

FINAL REPORT

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1.0. Introduction

Corruption is a major challenge to development and economic progress. It erodes public trust in government and leads to violations which undermine democracy, rule of law and respect for constitutional authority. Aside from the fact that corruption hurts the poor disproportionately by diverting scare resources intended for development, corruption feeds inequality and injustice. Conscious of the necessity to promote ethics and strengthen the fight against corruption, the Unit for the Promotion of Ethics and fight against Corruption in SONARA ordered for a four (4) days intensive training of 40 newly elected/recruited Ambassadors of Ethics[1] in SONARA in October, 2015.

The training for SONARA's Ambassadors of Ethics had a number of specific objectives outlined as follows:

1. Sensitize Ambassadors of Ethics on the sectoral Strategy against corruption to SONARA as defined in the National Anti-Corruption Strategy
2. Equip Ambassadors of Ethics with skills that will enable them to adopt an anti-corruption stance and ethical conduct in all circumstance
3. Strengthen their capacity with tools and skills that will enable them to organize and sensitize colleagues of their respective departments on ethical values
4. Facilitate and improve their knowledge and understanding of SONARA's Code of Ethics
5. Share examples of phenomenon, experiences and practices that could endanger their ethics and image of SONARA
6. Improve their ability to lead on ethical values and mediate between colleagues and the Unit for the Promotion of Ethics and Fight against Corruption in SONARA[2]

The expert trainer employed a combination of methods which include; slides and presentation, case study analysis, practical sessions and exchanges to achieve a combination of implicit and explicit value change in participants-consonant with the training objectives. At the end of the training there was a significant shift and change in terms of comprehension of SONARA's Code of Ethics as well as in their ability to communicate ethics and practice uprightness as SONARA's Ambassadors of Ethics. This report highlights activities associated with the training of SONARA's Ambassadors of Ethics from October 26th-29th, 2015 at the Training Center of SONARA. Starting with the training object, summary of the sessions and modules, signing of pledge and award of training certificates, participants' observations and comments incorporated under the training program evaluation and lastly recommendations and suggestions from participants for improving ethics and fights against corruption in SONARA.

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[1] TERMES DE REFERENCES POUR LA FORMATION DES AMBASSADEURS ETHIQUES
[2] Ibid (Cahier des Charges)

1.2. Training Goal & Structure

Following specifications and objects as outlined in detail in the introduction of this report above, the 40 participants were spread and shared into two groups of 20 each. The first group of 20 received training for 2 days covering 6 modules as follows:

- Module1: The National Anti-Corruption Strategy and SONARA
- Module 2: The Role of SONARA's Ambassadors of Ethics in Corruption Risk Assessment and Management in SONARA
- Module 3: SONARA'S Code of Ethics and its Implementation
- Module 4: Understanding Corruption Investigation & the Role of Intelligence
- Module 5: Understanding Schemes of Money Laundering & Predicate Offenses that could occur in SONARA
- Module 6: Understanding Corruption Information Mapping & Sharing including How to Design and Monitor Unethical Behavior in SONARA's Departments

These modules were repeated for the second training group of 20 participants who were scheduled for the last session making a total of 4 days for the entire exercise to be completed.

SESSIONS

1.3. DAY ONE SESSION 1

Day One began with an overview of the training program and an introduction of the expert trainer. The session itself started with a conceptual review of corruption. This conceptual review was intended to aid participants to properly understand 'how' and 'what' SONARA perceives and qualifies as corruption. In this context corruption and unethical behavior was approached from the angle expressed in SONARA's Code of Ethics which stood out as the official working document on 'what constitute or does not constitute ethical practice in SONARA'.

Instead of applying the broader controversial definitions of corruption into context that may find a particular practice inapplicable, participants were trained use the definition of corruption as explained in each organization's code of conduct/ or ethics as the key working definition from which malpractices in a company such as SONARA could be marked and tagged.

> *In the context of SONARA Code of Ethics, Corruption and unethical behavior is generally agreed to refer to:*
> *"acts that undermine SONARA's principles of ethical behavior including practices that destroy or devalue the company's image and reputation towards its clients, partners and promoters "*

However to socialize participants with what [universally] constitute a corrupt practice or unethical behavior, four case studies were introduced by the trainer to stimulate exchanges that will capture what participants could have missed in their prior understanding of what the management of SONARA sees corrupt and unethical practice in the behavior/actions of a member of staff.

Case Study Highlighted: 1

You are part of a Department in SONARA. Often (after work) you give a lift to one of the security guards. One day in the early morning you were driving to work and the security guard whom you often assist with a lift greets you and fails to put the metal detector under your car to run a scan. He quickly greets you and motion his hand that you drive your car into the refinery.

Questions:

1. What is wrong with this behavior?

2. Should you report your friend-the security guard?

3. Would it make a difference to the security of others seeing that both of you are not outsiders but staff of SONARA?

Case Study Highlighted 2

The Director General Manager of SONARA needs to have his identity card/passport processed at a government office. Your relative happens to work at the office, so in order to speed up the process and avoid the DG standing in line, you ask for his help speeding things up. Later the DG gives you 35,000CFAF for the assistance and you remove 5,000CFAF for postage of the ID/Passport to him and thereafter give your relative 30,000CFAF as a gift for helping out.

Questions:

o Could you or your relative's actions be considered illegal?

o Could the DG's action be considered fair?

o Did your action hurt others?

Case Study Highlighted: 3

You are searching for a piece of land to build your retirement home. A young chief who is a client of SONARA and keen admirer of your work to fight against corruption in SONARA meets you and offer a piece of land on looking the sea at 15,000,000CFAF in Limbe. You complain that the price is very high and remind him that your savings are not enough. He then decides to offer the same piece of land at 7.5million francs saying that you are a good man and that the remaining 7.5million francs is a gift for your hard work and refusal to collect bribe as a SONARA worker.

Questions:

1. What is wrong with this behavior?
2. Would you pay the 7.5 million and collect the beautiful piece of land?
3. Is it appropriate to inform SONARA of the circumstances under which the young chief sold you the land?

Case Study Highlighted: 4

Your Department is responsible for all purchases in the National Refining company (SONARA). You have to buy 5 new Toyota Hiace vans. You ask three car dealers for their best offers.

One of these dealers is a good friend of yours and he offers you free maintenance for your private car if you accept his offer. You accept this offer and he sells the vans to SONARA.

Questions:

- What do you think about this deal?
- Can you suggest a policy and/or a procedure IN SONARA's Code of Ethics that deals with these issues?

This session extended for more than an hour and a half covering other topical areas such as the causes of corruption, constrains in fighting corruption, stakes and benefits; including pre-conditions and indicators of success in the fight against corruption as detailed in the sectoral Strategy against corruption to SONARA described in the National Anti-Corruption Strategy of Cameroon.

1.4. Day 1 SESSION: 2

Assessing and managing the risk of corruption in SONARA was another high point in the training exercise.

The target of this module was threefold:

• Improve the ability of participants to indentify where corruption might occur within their departments

• Increase participants ability to treat and seal corruption risk areas within their respective departments

• Improve participants understanding of corruption/unethical behavior heat map and its significance

Being new to the subject, it was therefore important to explain to participants what Corruption Risk Assessment (CRA) and Risk Management (CRM) could mean for SONARA? As explained by the expert,

- Corruption Risk assessment involves being able **to identify areas** in the Refinery's departments where corruption/abuse of your SONARA's Code of Ethics might occur.
- The degree or likelihood of the occurrence (abuse of the Code of Ethics/corruption) by staff members

- And the Likely consequences or impact of corruption to the image of SONARA if it occurs in any of the departments. Some of the perceived consequences may include public embarrassment to the refinery, loss of resources and waste of time in dealing with corrupt conduct.

Managing the risk that could be brought in by corruption from corrupt staff members requires that the Ambassador of Ethics:

- Selects and enforce appropriate counter measures to seal off loopholes identified in the concern department which allows corruption from that staff to thrive. Such that corruption and disregard for the company's Code of Ethics prevented or eliminated

- These may include departmental risk profiling or mapping of corruption and unethical conducts, risk rating and conduct of awareness creation activities.

  During the Learning for Practice exercise under this module participants were asked to do the following exercise:

PRATICALS: Learning How to Conduct- RA- 6

- Identify which actions/omissions can be considered unethical or corrupt in your department (Key tool for instance can be individual company's compliance code)
- Generate a list of all possible risk (things that may happen which will impact negatively or abuse the Code Ethics) of your company
- Look at each of them to know what possible risk they may carry (e.g. Security and safety of colleagues, reputation of the company, loss of resources, etc)
- Here are some guides to help you:
- Conduct a Physical Security Survey (PSS) by answering the following questions;
1. What could go wrong in my department?
2. Why could it go wrong?
3. What consequences could there be if it went wrong?
4. What areas of the department could be vulnerable?

Exercise on RA & RM: Check List
Evaluating Progress Made...

- Is there up-to-date information to management about the risks of corruption in your company?
- Have the risks in each area within your company been assessed and ranked?
- Have you evaluated existing system risk control(s)?
- Do you have an unethical practice/corruption risk map for your company?
- Do you keep a corruption risk register
- Have you developed risk action schedules/plans to manage identified priority risks (list a few)

Some Recommended Interventions

Slide 19

Risk Treatment: Some Recommended Plan of Activities

- Conduct interviews (clients & service users to sample opinion on performance & satisfaction)
- Conduct surveys & introduce staff (peer review) assessment exercise vis a vis adherence to the Code of Ethics (Surveys may focus on perception of corruption/colleagues stated beliefs about the incidence of corruption)
- Keep a Risk Register (RR) & Produce a Corruption Risk Map (RM)*
- Organize workshops & focus group meetings and brainstorm on effective ways of applying/observing the code of ethics; Collect different views and build understanding
- Statements about experience and attitudes--Ask questions like: If you would try/want to be corrupt in X department which method would you use and how would you do so? (Run the same for clients and other service users and collect Red Flags)
- Provide colleagues with guidance resources

Slide 20

Keep a risk register & Produce a Heat Map

Dept. A: Corruption Risk	Probability Rating	Frequency	Anti-Corruption Controls	Action Plan Developed
Harassment	High	5	Non-effective	
Conflict of Interest	Medium	3	In progress	
Insider Dealing	Low	2	Effective	
Relationship with Customers & Suppliers	High	6	Non-effective	

This tool can be used to identify departments and processes within companies that are **Islands of Integrity** (departments and processes within a company that work effectively & with integrity)

Slide 21

Sample Unethical/Corrupt Practice Heat Map

Department X	PI	CI	CI	GP
Department Y	ID	ID	RCS	GP
Department Z	CI	PI	ID	GP
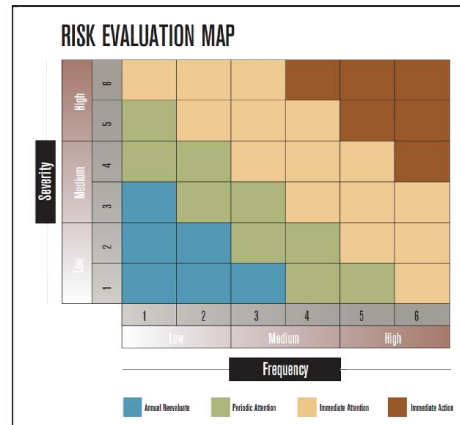
Slide (4)

RISK EVALUATION MAP

Ingram D. et al., 2004

Sense Making & Prioritizing of Information Collected

After a well deserved lunch break and recess participants were trained on various techniques that SONARA's Ambassadors of Ethics could use to conduct investigation and pass on intelligence on corrupt practices, staff and behavior to the Anti-Corruption and Ethics Unit of SONARA to stop the factor of money laundry in SONARA. To begin with Participants had to understand what Money Laundering is and how it could be practiced in SONARA. The aim of this module was to strengthen participants' capacity with tools and skills that will enable them to organize, monitor and prevent staff members from disguising illegally obtain profits from SONARA and also to understand a number of methods that could be useful in sensitizing colleagues of their respective departments against money laundering.

To set the tone money laundering was explained as follows:

- The process by which a person (employee of SONARA) conceals or disguises the Identity or true origin (ownership of property) of illegally obtain profits (Proceeds) derived from corruption [in SONARA] so that they appear to have originated from legitimate sources outside of the refinery.

Furthermore, participants were exposed to a number of case examples that highlight scenarios were conceal and disguise money they have stolen from SONARA and make it look as money from a non corrupt source.

Exercise

- Identify "potential high risk areas where money laundering activities are likely to appear in the Code of Ethics for SONARA"

Learning the ways Money Laundering Could be practiced in SONARA
Alternative Payment Systems
- This is a system where money can be transferred from one Department to another in the case of SONARA without any Cash transfer.
- Network of Brokers or <u>Internal Njangi Groups</u>

EXAMPLES OF WAYS SONARA CAN BE DEFRAUD OF MONEY

- A worker who wishes to convert an illegitimate/stolen profit from a transaction in SONARA with a Petroleum dealer in Nigeria can approach a money changer (broker) in Cameroon who has his colleague who is also a money changer (broker) in Nigeria to receive money on his behalf at a small fee.
- Rather than sending payment through his bank account, the Petroleum dealer pays the money to the broker in Nigeria. The Nigerian broker informs the colleague in Cameroon that he has received the money and the Cameroonian colleague pays SONARA worker the full amount. The SONARA worker reports that he has just collected his "Njangi" and the trace of payment is lost
- *This system can bypasses the formal state control barriers through financial control systems, it is fast, reliable and leaves no paper evidence of suspicious transaction/transfer of cash*

Trade base Money Disguise systems
Loading/offloading SONARA services and its Clients--Trading mispricing (this practice

accounts for up to 380 billion EURO of illicit financial flows from developing countries according to Global Integrity (Kar and Cartwright-Smith,2009)

- **Over and under-invoicing for shipping of good and services**

In this scheme the SONARA offended misrepresents the price of goods and services in order to disguise and transfer the additional value exchange between the controller and his head of department or between the payment office and the personal filling the reception report.

This can also occur between the importer and the exporter

- Company A (foreign petroleum company) ships 1000 metric tons of crude oil to SONARA worth 1500CFA each, But invoices the concerned SONARA department (Company B) 1000 metric tons of crude oil at 3000CFA each. SONARA pays A for the goods by sending a wire transfer for 1000 metric tons of crude oil at 3000CFA each. SONARA refines and ships the oil to a partner which is then sold in the open market and the extra 1500CFA deposits is wire into the bank account of Company A (the difference between the invoiced priced and the "fair market value") to be disburse according to instructions.

- Company A (foreign petroleum company) ships 1000 metric tons of crude oil to SONARA worth 500CFA each, But invoices the concerned SONARA department (Company B) 1000 metric tons of crude oil at 250CFA each. SONARA pays A for the goods by sending a wire transfer for 1000 metric tons of crude oil at 250CFA each. SONARA refines and ships the oil to a partner which is then sold in the open market and the extra 250CFA deposits is wire into the bank account of Company A (the difference between the invoiced priced and the "fair market value") to be disburse according to instructions.

- **Over and Under Shipping Goods and Services**
- **Multiple invoicing of single quantities of goods and services**
- **Falsely describing goods and services**

- The offended misrepresents the quality or type of goods or services as either more or less valuable depending on whether they which to receive more or less in exchange
- **For example**: Again an employee of SONARA is sick and was treated somewhere in Limbe at a total cost of 40,000CFA. She returns to the company and presents a medical bill of 40,000CFA to the medical department for re-imbursement. The finance department adds a zero at the end of the bill (400,000CFA) after negotiation. The money is disbursed and share according to instructions

Session 1

Day two of the training exercise focused on strategies and methods to implement SONARA's Code of Ethics, Intelligence gathering and information sharing to track and prevent corrupt staff and practices from destroying SONARA's company image to its clients, including how to identify various forms of corrupt behavior and how to design corruption monitoring and tracing forms.

Implementing SONARA's Code of Ethics

In this session participants gained awareness and strengthened their capacity through:
- ▶ Enhanced understanding of the Operational terms- Code of Conduct/Ethics
- ▶ Frameworks for implementing and promoting SONARA's Code of Ethics/Conduct
- ▶ A list of Factors that affect the Company's Culture
- ▶ Effects of the SONARA's Culture on its Performance
- ▶ Able to identify what constitutes an Ethical Behavior in SONARA
- ▶ Guidelines for managing the SONARA's Culture & Behavior

To highlight some of strategies which participants learnt to use in promoting the implementation of SONARAs' Code of Ethics below are a few:

Maintaining SONARA's Culture: Knowing the Factors that may affect it

Companies need to institute best practices in their work place in order to positively influence the best practice culture and fight deviations. A list of factors that could influence the success of AOE to maintain and promote the culture of SONARA are as follows:

▶ The nature of work performed by the staff/his/her working conditions

- ▶ Remuneration packages /job satisfaction
- ▶ job satisfaction/dissatisfaction,
- ▶ individual personality,
- ▶ peer influence,
- ▶ leadership styles,
- ▶ management practices,
- ▶ communication,
- ▶ policy on ethical standards,
- ▶ mission statements, objectives, and
- ▶ organizational structures (roles not clearly defined)

Checking List for Analyzing SONARA's Company Culture in each department for Positive Influence (Which participants had to verify in their break out session)

- ▶ Can you describe the culture of your Department?
- ▶ Are the values similar with all/other staff or vary?
- ▶ Provide a list of various subcultures/ethical behavior within your department
- ▶ Do this culture support the corruption prevention goals (as described in the Code of Ethics) which you are trying to achieve?
- ▶ Have you review all existing departmental policies that conflict with the ethical goal and which continues to impact ethical behavior negatively in your department?
- ▶ Document your objectives for a change of culture in your department
- ▶ Have you thought of how these objectives apply to various groups within your department
- ▶ Can you provide a list of the methods you will put In place to get your message across to staff, customers/clients and other stakeholders?
- ▶ Please provide a plan of how you will evaluate the effectiveness of the strategies you have put in place in to create a positive organization culture in your department as per SONARA's Code of Ethics

1.7. DAY 2 SESSION: 2

Conscious of the need to share examples of phenomenon, experiences and practices that could endanger their ethics and image of SONARA and mindful of the importance to improve SONARA's Ambassadors of Ethics ability to lead on ethical values and mediate between colleagues and the Unit for the Promotion of Ethics and Fight against Corruption in SONARA; participants were trained on the role of intelligence in combating corruption in SONARA, including the quality of information that could enhance the role of the Anti-Corruption and Ethics Unit of SONARA to prevent ands stop corruption from spreading.

This includes:
Understanding what Information & What is is Intelligence in the context of the fight against Corruption & Promotion of Ethics.
Understanding How to Process Information into useful Intelligence to combat corruption
The 6 Standard Intelligence Gathering/Information Processing Questions

- **WHO?**
- Full name, plus other indentifying personal particulars such as date of birth, current address, nicknames and aliases, nationality family members
- **WHAT**
- Criminal activities/unethical offenses identified
- Scale and frequency of the offense/criminal activity
- Associates and contacts
- Business activity/education/where it was obtained or legalized
- **Where?**
- Main location of operation/criminal activity
- Vehicle numbers, including driving license details an vehicle registration number, travel details & routes to locate where crime is committed
- **When?**
- Actual dates and time
- Periods (from/to)
- **How?**
- Criminal methods (how offence is conducted or organized)
- Means of communication (Telephone use, internet use & language used)
- Attitude towards work and other colleagues
- **WHY?**
- Motivation/reason for action and choices
- Lifestyle and commitments (help decode use of criminal proceeds such as entertainment, holidays vehicle purchases etc)

Exercise 1: What is lacking to Process this information into Intelligence?

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- There are some workers of the Exploitation Department (company X) who are stealing fuel during the night from the company's seaward oil terminal.

- The two workers are said to have organized with some individuals to provide them with fuel via the terminal. In response to this arrangement, the two workers hit themselves at the terminal under the cover of darkness with the aid of a speed boat and fuel containers.
- As I observed the two workers then engaged the pumps of the terminal where oil tankers usually dock to load and offload petroleum and loaded out refined products from the company.

Using/Applying the 6 Standard Questions in your Company to monitor & report corruption & non-compliance

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- WHO: who did what?
- WHAT: what did he do against the code of ethical practice?
- WHERE: Where was the offense committed?
- WHEN: When did he commit the offense (date and time)?
- HOW: Narrate the method and means employed
- WHY: What motivated the crime (system lapses, opportunity, need)

Note: All questions have to be answered before the process is complete for reporting. (this intelligence can also be used to update the code of ethics)

Gifts & Benefits

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Who?	Purchasing manager
What?	300,000CFA
When?	Over a two year period
How?	Purchasing manager purchased cars for the company from a car dealer at inflated rates Car dealership provided purchasing manager with kickbacks (holiday packages provided to his family each Christmas above 25,000CFA)
Why?	Opportunity Greed
How could this have been prevented?	Provide regular fraud awareness training and reaffirm the organisation's ethics policy on a regular basis Segregation of duties

1.8. DAY 3 SESSION 3

The last training module was key to helping SONARA's Ambassadors of Ethics take stance against corruption and expose the corrupt in their respective departments. However to efficiently do this, the Ambassadors had to understand how to collect hard evidence of corrupt practices and unethical behavior in their respective departments that could inspire sanctions at top management level in SONARA. Here participants learn five important tools and skills sets.

Designing a corruption and ethics monitoring form

Corrupt Act	Tick	Date
Bribery		
Embezzlement of funds		
Looting of public property/land grabbing		
Money laundering		
Theft or attempted theft		
Complicity/laxity/cover-ups		
Conflict of Interest		
Tax evasion		
Extortion		
Fraud/forgery		
Pay-offs		
Impersonation/false pretences		
Gratuities and gifts		
Wastage/Misuse of resources, facilities, funds		
Staff harassment/threats/intimidation		
Sexual exploitation		
Denial of access to public services		
Discriminatory practices		

Corruption Monitoring

▶ The following corruption occurrences may have been manifested in your department or service. We would like to help improve service & client experience. Please select the applicable malfeasance in your department/service from the list below & drop in our suggestion box

Understanding potential forms of corrupt behavior in SONARA

Bribery
Embezzlement of funds
Looting of public property/land grabbing
Money laundering
Theft or attempted theft
Complicity/laxity/cover-ups
Conflict of Interest
Tax evasion
Extortion
Fraud/forgery
Pay-offs
Impersonation/false pretences
Gratuities and gifts
Wastage/Misuse of resources, facilities, funds
Staff harassment/threats/intimidation
Sexual exploitation
Denial of access to public services
Discriminatory practices
Other (specify)

Understanding Potential Forms of Corrupt Behavior

2

Developing and presenting a Fraud and Ethics Commentary Sheet

AOE: Fraud & Ethics Commentary Sheet

Sheet N0.

Department	Corrupt/unethical conduct reported	Frequency Rating	Consequences for the Company	Proposed Action for Mitigation

Probability   Severity   Reputation Compliance

Sense making and Mapping of Zones of High Frequency of corrupt behavior and unethical practice

RISK EVALUATION MAP

Ingram D. et al., 2004

Sense Making & Prioritizing of Information Collected

Corruption information mapping and presentation to ease decision making, policy as well as implementation of a good strategy at top management level in SONARA
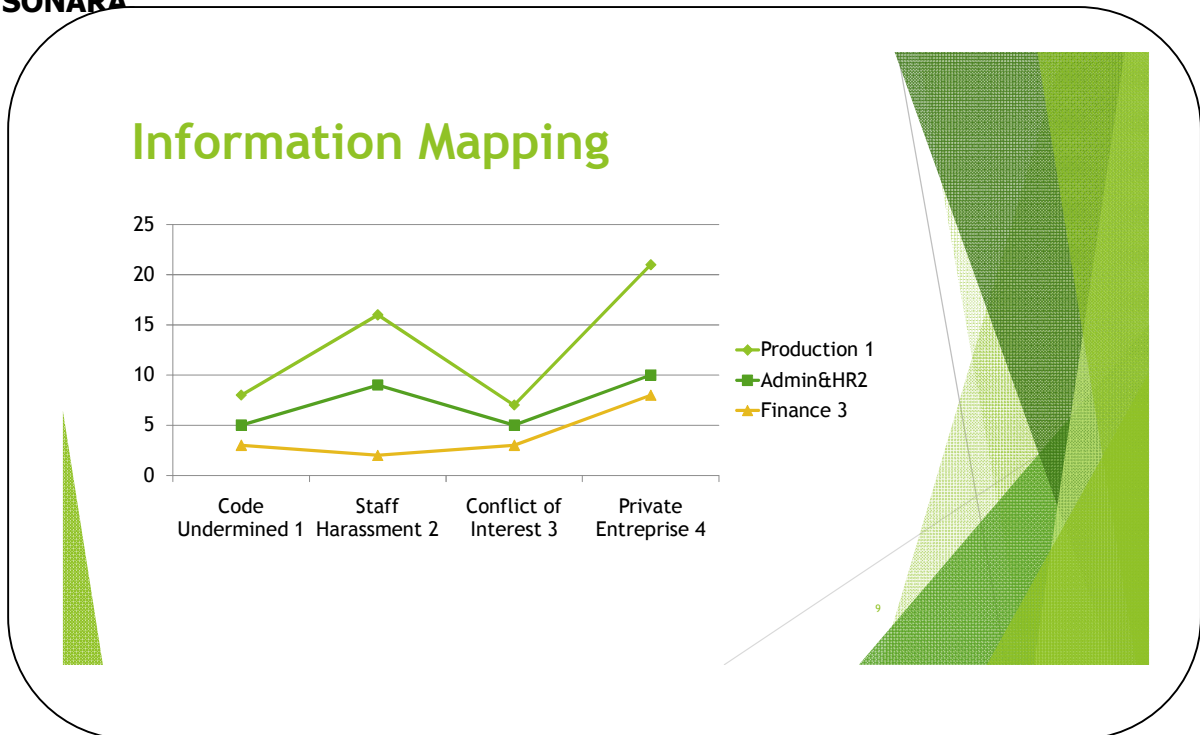
When corruption occurrence in a department is presented in this way it helps the Anti-Corruption and Ethics Unit of SONARA to see clearly where (department) corrupt practice or abuse of SONARA's Code of Ethics is highest. In this exercise you realize that *staff harassment* and *private enterprise* is highest at the *production department.*

After the Lunch break, the last module was discussed followed by a video projection on non-violent corruption resistance; the concept behind the projection being to encourage participants to recognize their responsibility and challenges they could encounter in combating corruption while bearing in mind at the same time that their inaction could equally serve as some form of encouragement to the status squo and the corrupt in SONARA.

1.9. Day 3 and 4 Session & Closing

As noted in the introduction of this report, the second set of SONARA's Ambassadors of Ethics (group of 20) underwent the same training exercise with the modules aforementioned for 2 days.

Participants Observation

The participants were active and exchanged properly and knowledgeably during the four days of the training. They expressed satisfaction to management of SONARA for organizing a training of this quality and dept and went a step ahead during the discourse to identify areas in SONARA where the corruption heat is at its peak and made suggestions (see chart below under program evaluation for details) to curb it.

Signing of Pledge

Immediately after the lunch break and following the end of presentations, each of the groups 1 and 2 (3 and 4) gathered in the training hall (with respect to their individual dates) where participants were asked to sign their pledges and collect their end of training certificate. At the end of the training an evaluation note of the training workshop was distributed by the training moderator to rate the training and make recommendations (see chart below under program evaluation for details).

Closing Remarks

At the closing final remarks of satisfaction came from both the organizers and who commended SONARA for its efforts in the successful organization of the activity. The organizers gave their impression about the group, their enthusiasm and their feedback moving forward. At the end two members from the anti-corruption and ethics unit of

SONARA handed certificates to participants prepared by the Cameroon chapter of the International Governance Institute in the United Kingdom.

Ambassadors of ethics receiving their end of training certificates
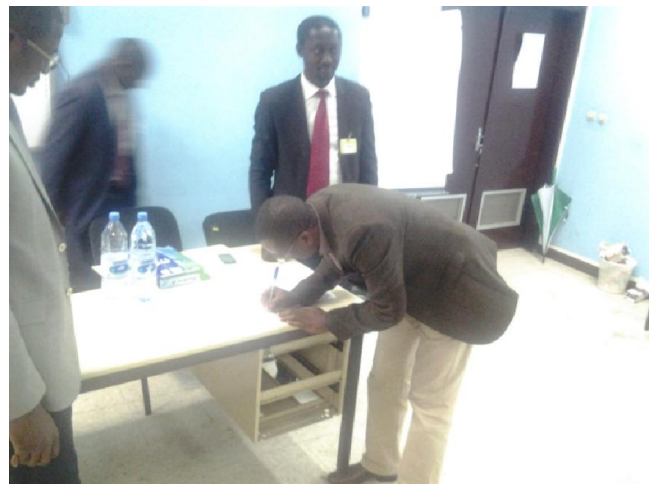
Signing of pledge by SONARA Ambassadors of Ethics

1.10. Evaluation of Training Program

The evaluation made by the participants who filled in and submitted to the organizers. The evaluation notes reflects the benefits they gained from the training. They all indicated that the quality of the training was very high and admitted that it was a useful and relevant to their needs and expectations. The following table summarizes the results of the evaluation.

Table (1): Summary of the training evaluation by participants.

Indicator	Quality of training	Relevance of training	Effectiveness Of training	Assimilation of training	Features not included
High	34	30 found the training to be very relevant & (useful)	31 (fully effective)	34 (Yes)	Translation of training materials
Good	2	Only 4 found it to be good	4 (Adequate)	2 (Do not know)	-
Poor	-	-	-	-	-

The numbers in the cells refer to number of participants.

1.11. Recommendations

During the workshop several recommendations were made by the participants. The most outstanding are these:

1- That the training program should be at least 4 times a year and that training should take place out of SONARA.
2- Materials distributed in English language should be translated into French.
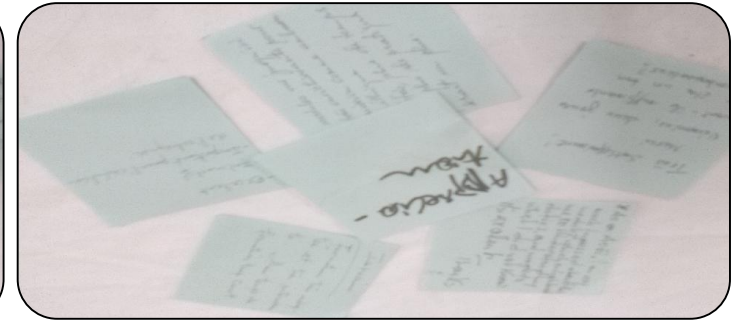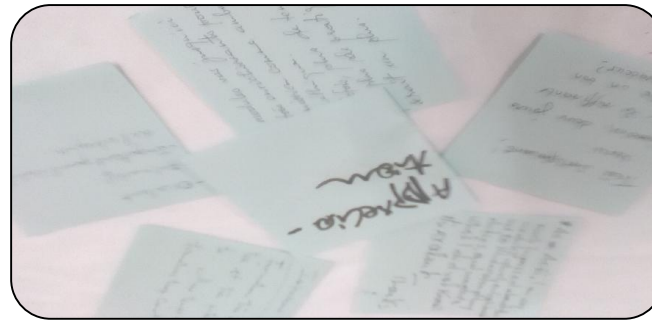3- Human and Financial resources should be mobilized to ensure the effective implementation of SONARA's Code of Ethics
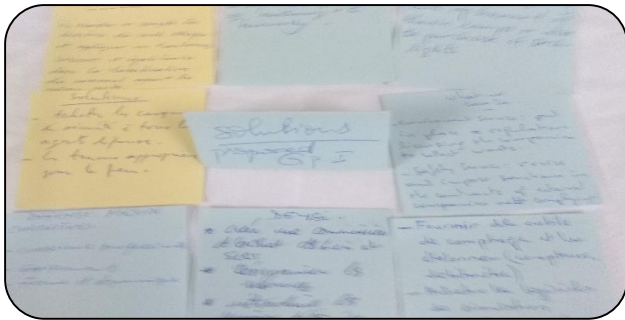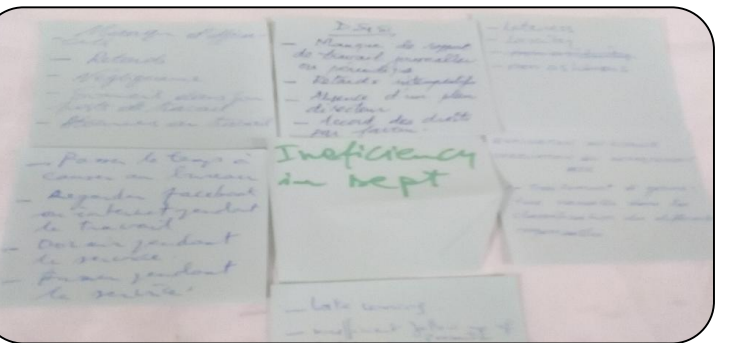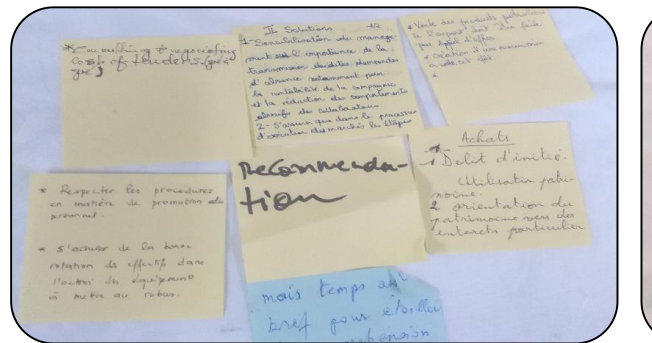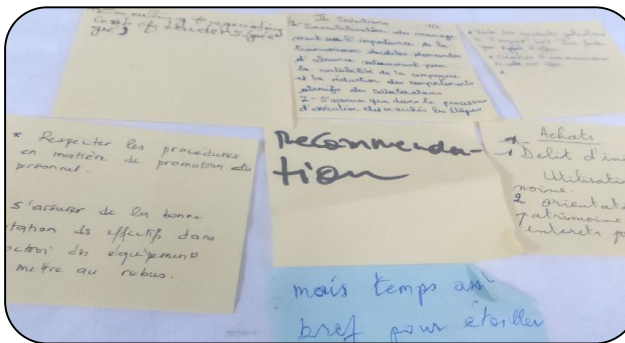
TRAINING EVALUATION & SUGGESTED AREAS IN SONARA FOR IMPROVEMENTS
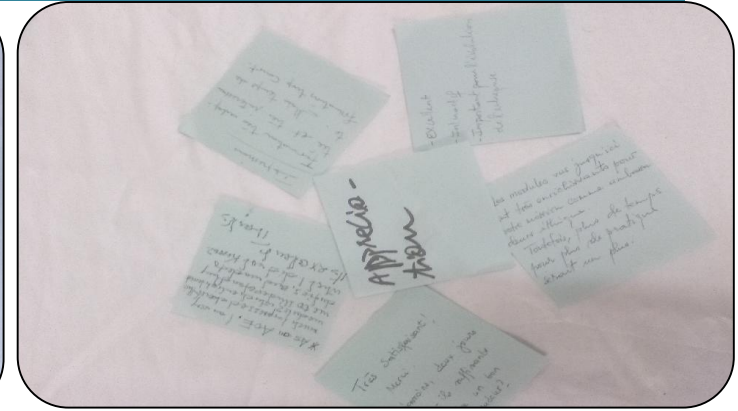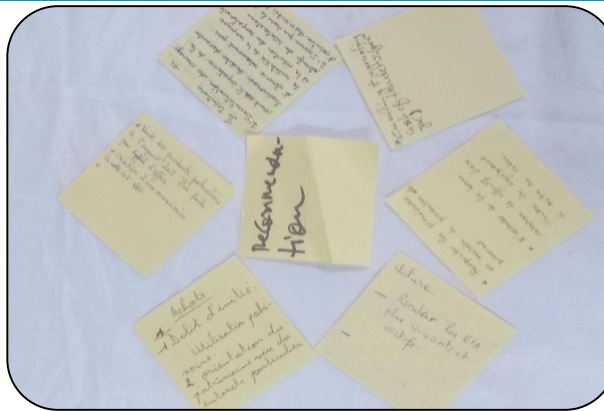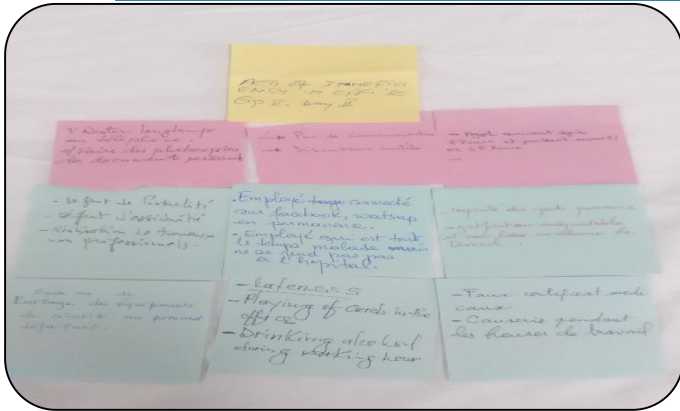
AREAS IDENTIFIED BY PARTICIANTS TO BE HIGHLY PRONE TO CORRUPTION INCLUDING PROPOSED SOLUTIONS

RECOMMENDATIONS

During the training Ambassadors of Ethics of SONARA, were asked to identify areas in their various departments prone to corruption and to propose possible solutions. Below is a table depicting reactions from the 40 participants [as they wrote it].
NB: participants were more interested in identifying the **corrupt practices** rather than the **areas** more exposed to corruption.

Identify areas in **various departments prone to corruption**	Propose solutions to **problems** Identified
Demotivation	Rendre les EIA plus vivants et actifs
Délit d'initié, utilization du patrimoine de la SONARA à des fins personnelles	Pour l'embauche, communiquer assez ou largement les offres
Vente des produits pétroliers	La vente des produits pétrolier doit être faite par appel d'offre et exiger la creation d'une commission â cet effet
Direction des contoles techniques (outils de comptage des produits, compteurs, debitmètres...); outils de simulation du brut (logiciel); méthodes de reveil	Sensibiliser le management sur l'importance de la transmission des demandes d'absence notamment pour la rentabilité de la compagnie et la reduction des comportements abusifs des collaborateurs
Les agents de defense manquent de tenues appropriées en traversant les unités. Accès des agents SONARA sans badges; accès des chauffeurs camions au PCCC.	S'assurer que dans le processus d'exécution des marchés les étapes incombant à la SONARA soient faites dans les délais. Former le personnel concerne à la gestion des contrats.
Lack of safety equipment or late provision	Respecter le processus en matière de promotion du personnel
Plan de carrière.	S'assurer de la bonne rotation des éffectifs dans l'octroi des équipements à mettre au robus.
Risk of non-compliance of external companies on safety measures	Roter les agents, former le personnel sur la corruption, sensibiliser l'encadrement
Relationship with media outlets; purchase of advert spaces; mauvaise réception des travaux; le tribalisme; le non suivis de carrière du personnel; le non respect des règles de sécurite dans l'execution des tâches	Electrifier la zone, renforcer le service de sécurité et de surveillance, mobiliser les intervenants, placer des cameras de surveillance, placer le matériel de comptage adéquat, responsabiliser les intervenants.

Au cours de la reception des traveaux, l'inspecteur signe comme conforme pour les traveaux effectués alors que les debits des traveaux sont mals faits, juste parce que l'entrepreneur lui a donné un pot de peinture	Eviter le tribalisme en prenant compte toutes les parties, respecter la carrière de chaque employé et respecter les règles établies.
L'équipement ne pourra pas tenir pour les traveaux supposes. Allocation des équipements de diverses natures aux employés; respect de l'orde pre-etablis.	Former, sensibiliser les chefs de département sur les conséquenses de leurs actes en entreprise.
Non transmission des fiches d'absence à la DAHR pour prise en compte. Non application des penalités aux sous-traitants ne respectant pas les délais d'exécution des marchés.	Conscience professionnelle
Exportation/vente des produits pétroliers entre relations avec les clients et fournisseurs.	Fournir les outils de comptage, acheter le logiciel de simulation, écrire les procedures strictes de travail, meilleur choix de la matière première
Les formations du personnel; manipulation des compteurs au PCCC; gonflement des factures; missions fictives	Prendre en compte les directives du code éthique et appliquer un traitement cohéren et égalitaire dans la classification du personnel ayant les mêmes postes.
Donner l'appréciation à un sous-traitant qui ne mérite pas; prendre plus de 50,000 frs du sous traitant; organizer les tontines au sein du service	Increase of lighting and replacement of blown lamps or purchase of torch lights.
Le favoritisme qui entraine des pertes pour la SONARA qui paie le personnel à ne rien faire;	Introduire les reunions d'équipe du matin
	Acheter les casques de securities à tous les agents de défense.
	Put in place a regulation licensing the companies to collect waste. Revise and impose sanctions in the contracts of external companies not complying.