



MARITIME ANTI-CORRUPTION NETWORK 2021 ANNUAL REPORT



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The World Changes

As we celebrate The Maritime Anti-Corruption Network's (MACN) ten years of growth, and reflect on the last 12 months' work, we cannot ignore the enormous and ongoing repercussions of the global COVID-19 pandemic, the maritime supply chain crunch, and the invasion of the Ukraine by Russia. These events have led to seismic changes in the maritime operating environment, a renewed focus on anti-corruption as part of foreign policy, strict sanctions now being implemented, and a focus on companies' ethical conduct and tangible ESG reporting.

In this rapidly evolving context, MACN's work and our ability to adapt to changing local conditions is more important and relevant than ever. We believe there is a clear move to increased transparency and operational accountability that will, undoubtedly, lead to points of friction between those with a vested interest in the status quo, and an industry which is pushing for change with the support of regulators and the wider public.

MACN's industry-driven leadership, industry support, and in-country work over the last 10 years has positioned us well to respond to the varied challenges shipping now faces. This can specifically be seen in the development of our reporting of corrupt demands, a specific focus on training and capacity building, and our growing network of local partners and the expansion of our in-country work.

Data and the Importance of Reporting Corruption

A central component of MACN's work is our anonymous incident reporting system. Launched in 2013, MACN's anonymous incident reporting system has received close to 50,000 incident reports (end of 2021), covering over 1,000 ports, in over 150 countries. The importance of this platform has been recognized by international organizations such as the International Maritime Organization (IMO), United Nations Development Program, Baltic and International Maritime Council (BIMCO), and the International Chamber of Shipping (ICS).



Compliance, eLearning, and Training

If incident reporting helps identify the presence and scale of corruption, training and compliance education – on shore and at sea – are a key part of building a solution. Over the last ten years MACN has developed training programs both for the private and public sector and we have reached thousands of port staff, seafarers, and onshore shipping company employees. We are now in dialogue with maritime academies to develop specific courses for the next generation of seafarers.

As a result of industry feedback, we recognize there is also a need to better tie third party risk assessment into capacity building. We are in the process of developing a third-party risk management platform that will also support capacity building at the industry supplier level.

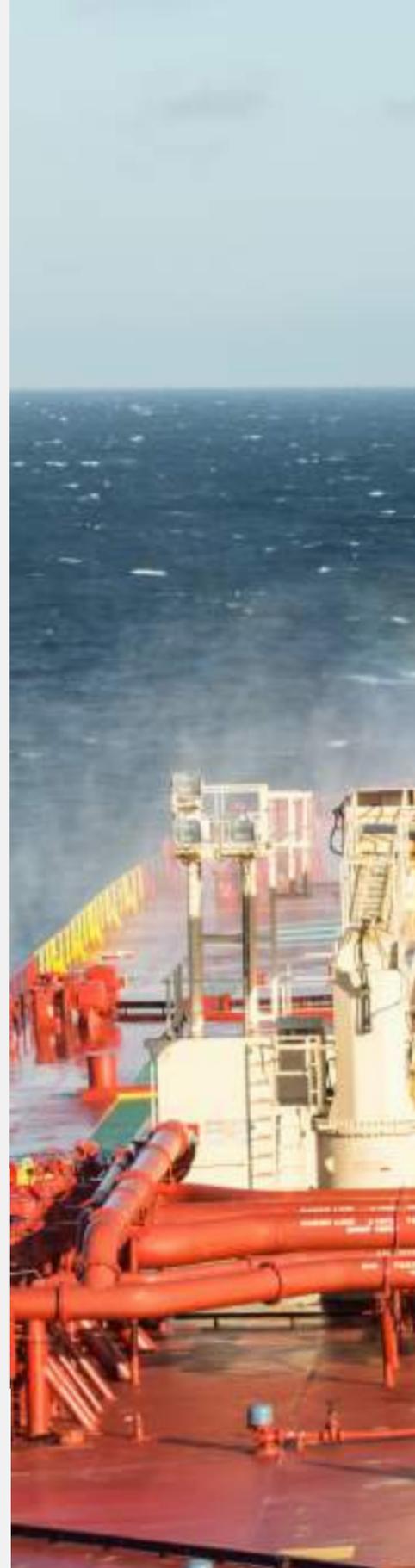
Our Global Partners

In our 10-year journey, one of our real success stories has been the role and development of our global partner network. Partners in Nigeria, India, Ukraine, Argentina, Egypt, Indonesia, Bangladesh, and Pakistan have been at the cutting edge of our anti-corruption work. They have driven our in-country activities, worked with central and local government, and managed Helpdesks for vessels and crew calling at local ports. Their success is our success, and one of the most important lessons we have learned has been the importance and value of local experts in driving anti-corruption change with the support and engagement of international business.

ANK Law, Our Partners in the Ukraine

Over the course of writing this report, our local Ukraine partners, ANK Law, were forced to work from remote locations due to the invasion of their country by Russia. They were still providing updates and support for MACN member vessels and companies caught up in these horrific events.

We are all deeply concerned for their safety and wellbeing, and enormously grateful for the contributions they continue to make.





Grown from
8 to 167 members
in 10 years

3 Awards

Trace, Safety4sea and
Highly Commended
at the Seatrade awards

17,000 member company
staff have directly taken
MACNs Elearning course

17 companies have embedded
MACN's training into their
own learning platform

48,000 number of Incidents

Over 1,000 ports captured
in our **anonomous database**

Over 1,500 government officials
trained in integrity **in Nigeria,
Argentina, and Indonesia**

Supported **3**
submissions to the IMO
on maritime corruption

**90% reduction of corrupt
demands** in our country
program in Argetina

642 uses of the HelpDesk
*(indicates a use of the HelpDesk
and not actioned cases)

86 resolved cases
through our in-country
Helpdesks

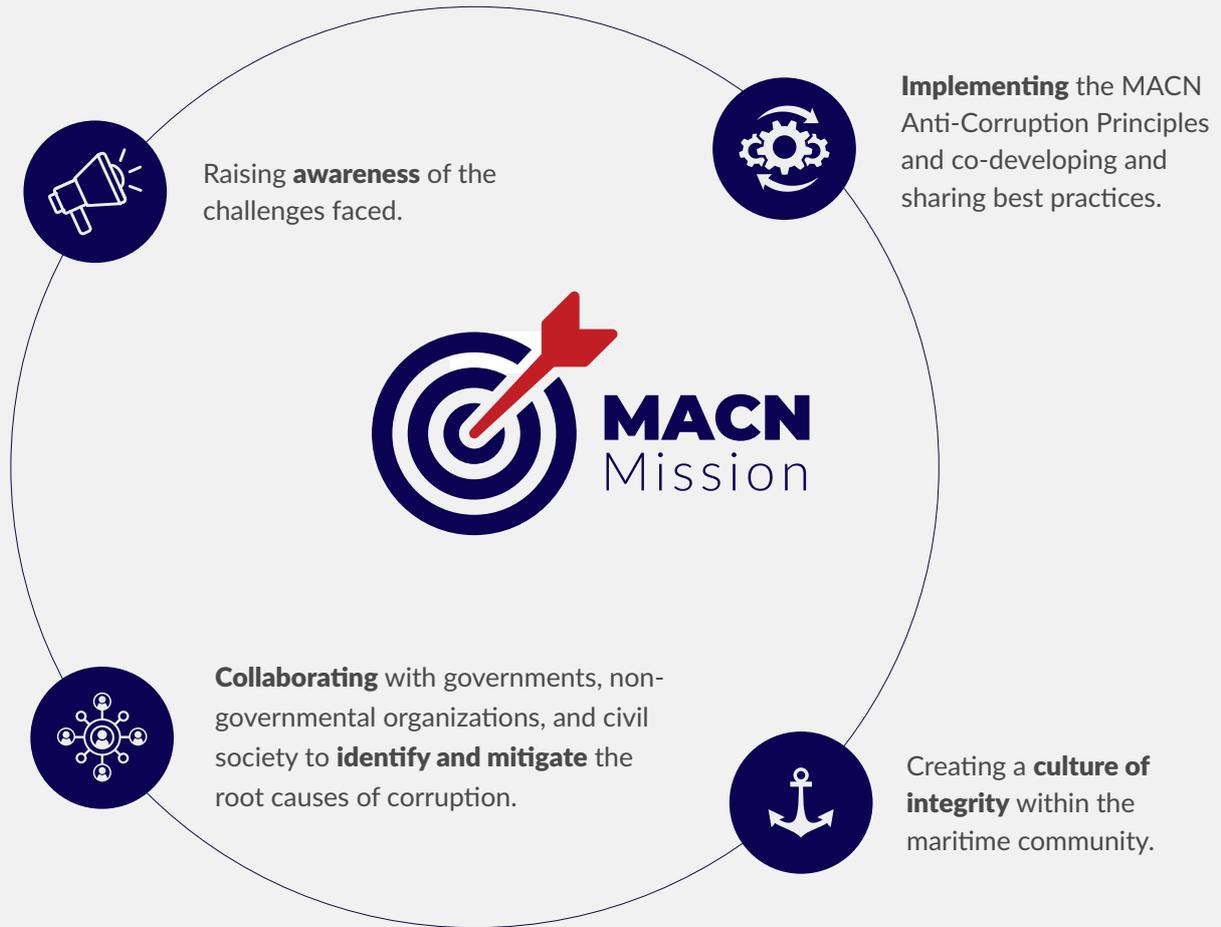
215,316 Facebook Followers



MACN's 10-Year Journey

MACN provides a unique global forum for businesses to contribute to the elimination of corrupt practices in the maritime industry. MACN is composed of vessel-owning companies and others in the maritime industry, including cargo owners and service providers.

MACN was established in 2011 as an industry-led collective action initiative, with a goal of stamping out corruption in the maritime industry and promoting inclusive trade. With over 170 companies (www.macn.dk) across the maritime industry, making up over 50% of global tonnage, MACN has become one of the preeminent examples of an industry-led collective action network taking tangible steps to eliminate corruption across the supply chain. By working in partnership with the industry, governments, and civil society MACN has been successful in addressing corruption risks through country-specific actions in locations as diverse as Nigeria, Indonesia, Egypt, India, Ukraine, and Argentina. MACN's initiatives have been welcomed by stakeholders and have resulted in measurable outcomes such as the removal of trade barriers, strengthened governance frameworks, and substantially reduced corruption risks in maritime trade



MACN Vision

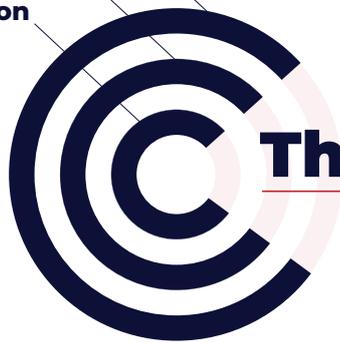
A maritime industry **free of corruption** that enables fair trade to the benefit of society at large.



Capability Building

Collective Action

Collaboration



The Three Cs of MACN

MACN works towards its vision through three objectives that are elaborated in the MACN Mission, and symbol: Capability Building, Collective Action, and Collaboration.



MACN Governance

MACN is a mission-driven non-for-profit legal entity, established as an Association in Denmark (CVR number 41887958). The Network is governed by a member-led Board and managed by the MACN Secretariat which is based in Copenhagen. The MACN Secretariat is responsible for progressing MACN's strategic workplans, ensuring good governance, and managing day-to-day work, including liaison with members, in-country third parties, and funders. This report covers activities for 1 January 2021 – 31 December 2021 in terms of data but reflects on MACN's 10-year journey.

In 2021 MACN had:

8 Staff members in Copenhagen

7 active in-country programs



2011

MACN is founded

2012

First collective action launched in Nigeria together with UNDP

2013

Anonymous Incident Reporting System is launched

2014

Anti-corruption eLearning developed for members

In-country work in Argentina begins

2015

UK Foreign and Commonwealth Office (UKFCO) awards funding

TRACE Innovation in Anti-Bribery Compliance Award (IACA)

In-country work in the port Tanjung Priok, Indonesia

'Say No' campaign in the Suez Canal, Egypt

2016

Development of an anti-corruption charter party clause (further developed and supported by BIMCO)

2017

International Chamber of Shipping (ICS) and MACN initiate a cross-industry working group to engage industry organizations and associations to collaborate on corruption issues and solutions.

2018

Membership reaches over 100 companies

Say No campaign piloted in Mumbai ports, India

Collective action in Argentina results 90% reduction of corrupt demands

Awarded SAFETY4SEA Sustainability Award

2019

First IMO submission on maritime corruption is submitted and supported by industry and member states. MACN works with the cross industry working group established in 2017 on the submission

Awarded funding from the Danish International Development Agency (DANIDA)

First HelpDesk in Nigeria piloted - a unique tool providing real time support

2020

Awarded funding from the Siemens Integrity Initiative's Third funding round

HelpDesk launched in Ukraine

Revised and expanded eLearning package launched for members

2021

MACN becomes its own legal entity based in Denmark

HelpDesk in Egypt launched

Awarded funding from the Siemens Integrity Initiative's Golden Stretch funding round

Collective action in Nigeria achieves reduced time in ports and operational cost savings

FIGHTING CORRUPTION

— AND THE —

SUSTAINABLE DEVELOPMENT GOALS

The 2030 Agenda for Sustainable Development and the 17 Sustainable Development Goals (SDGs) aim to build a better future for all. The 17 SDGs are integrated - recognizing that action in one area will affect outcomes in others and that development must balance social, economic, and environmental sustainability.

Corruption is a major obstacle to sustainable development, as it affects all five pillars of sustainable development – people, planet, prosperity, peace, and partnerships. Corruption is a major threat to countries, people’s lives, and livelihoods.

Corruption leads to weak institutions, creates injustice and insecurity, destroys justice and fairness, and deprives people of basic needs such as health care, education, clean water, sanitation, and housing. It also stops economic growth, threatens environmental resources,

destroys innovation, and makes our world even more turbulent. The importance of anti-corruption is explicitly highlighted in SDG 16 (Peace, Justice, and Strong Institutions) and in the targets:

- Target 4: By 2030, significantly reduce illicit financial and arms flows, strengthen the recovery and return of stolen assets, and combat all forms of organized crime.
- Target 5: Substantially reduce corruption and bribery in all their forms.
- Target 10: Ensure public access to information and protect fundamental freedoms, in accordance with national legislation and international agreements.

Goal 16 plays an instrumental role in ensuring an integrated approach toward development. Focused on addressing governance deficits and challenges posed by profound social transformation, it tackles the root causes for many development issues covered under other SDGs. SDG 16 is closely interlinked with other SDGs. Without peace, justice, and inclusion, achieving goals such as ending poverty, ensuring education, promoting economic growth can be difficult or impossible. At the same time, various SDGs can help or hinder the achievement of SDG 16, for instance climate change can act as a threat multiplier, aggravating additional social, environmental, and political stressors, conditions that could possibly lead to violence.

Through its set up, MACN is a strong example of SDG 17 (Partnerships for the Goals), while tackling corruption has a strong alignment with SDG 16 (Peace, Justice, and Strong Institutions). Further, without linking to a specific goal, corruption in the maritime sector constitutes a non-tariff trade barrier that drives up trade costs and impedes economic and social development, particularly in developing countries. Expanding trade opportunities for low and middle-income countries by reducing corruption in the maritime supply chain is an essential part of integrating these communities into global value chains and attracting much-needed capital, technology, and know-how. In this regard MACN's work connects to multiple SDGs. Through MACN's in-country activities and the promotion of responsible business practices in the shipping industry, we have also created a better work environment for seafarers globally.

MACN has mapped the Network's activities to the relevant reporting frameworks such as the Global Reporting Initiative (GRI) and SASBI. Annex I to this report is intended to illustrate the impact of MACN's work.



A Decade of Reporting

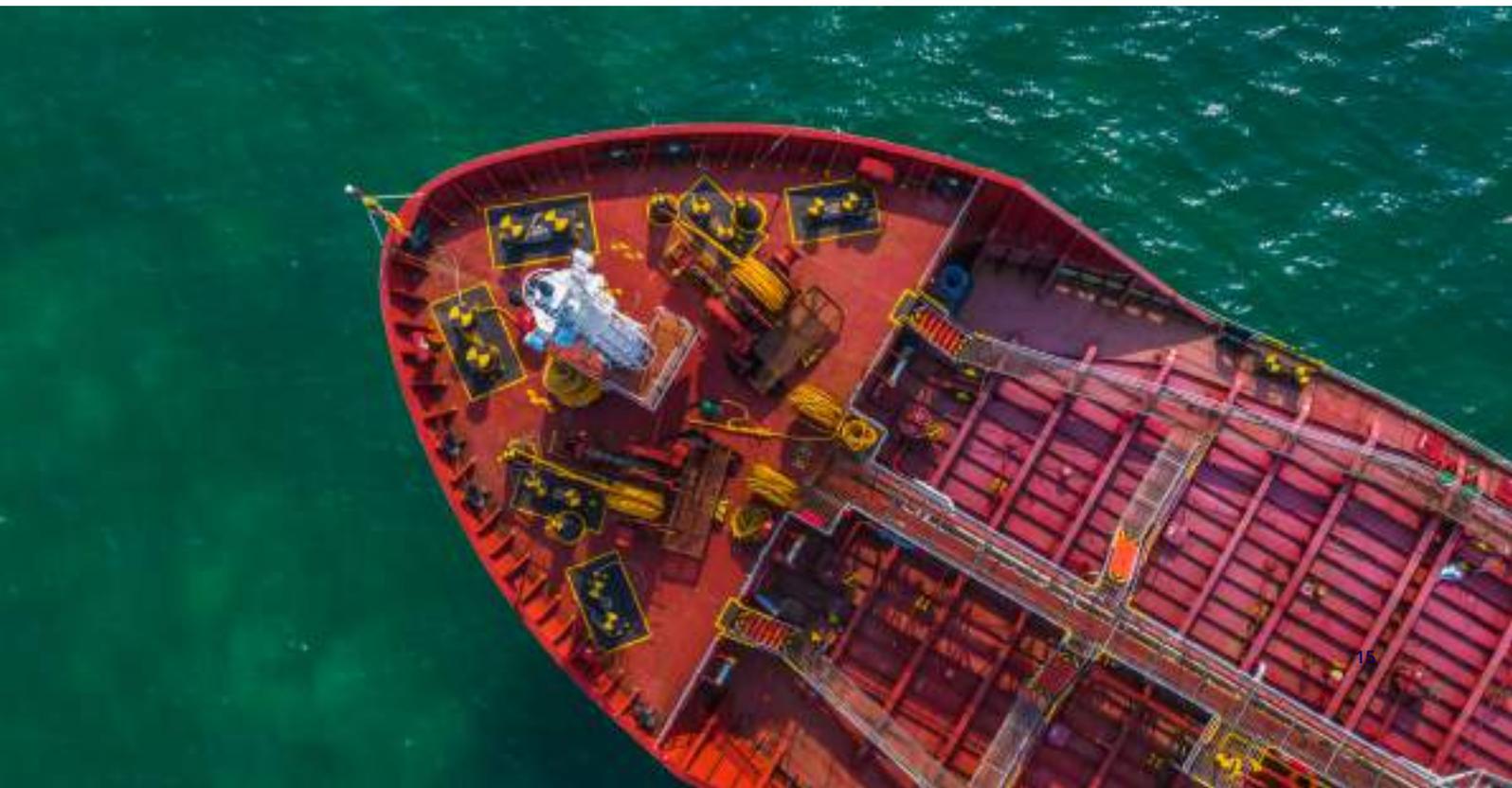
MACN's Anonymous Incident Reporting Mechanism

MACN's anonymous incident reporting system enables the maritime community to submit reports on corrupt demands they have faced during port calls. Reporting is anonymous and non-attributable: It is not possible for anyone to identify who has submitted a report, and the report does not include details that would identify ships or individuals. The anonymous reporting system is open to both MACN members as well as non-members.

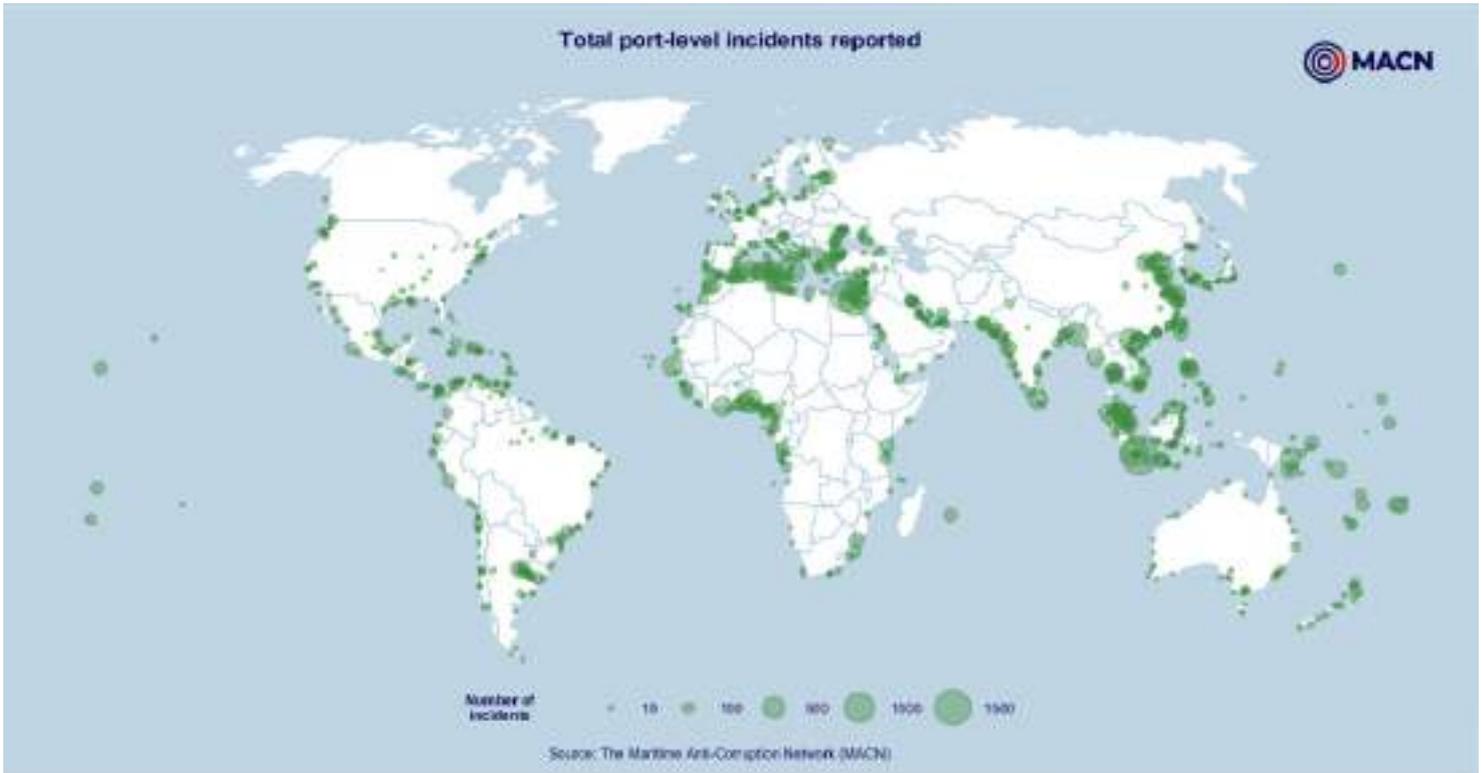
The outputs of the reporting system allow members to learn from each other to potentially avoid similar incidents in their own operations. Use of the system has significantly increased over the years.

The anonymous incident reporting supports the advancement of the three pillars of MACN's strategy – capacity building, collaboration, and collective action. MACN's incident reporting system not only helps improve corporate practices such as compliance management, but also encourages dialogue about shared integrity issues. It drives MACN's collective action programs to ultimately strengthen the operating environment and port sector governance.

MACN's system is unique because the amount of data collected has helped advance MACN's in-country work, and it has opened dialogue with governments and civil society. When data indicates that there is a systemic issue in a certain port, it can serve as a “door opener” to governments and government agencies to collaborate with MACN. The data is not intended to serve as evidence or to replace law enforcement but, in several countries, it has triggered actions such as further investigations, gap assessments, and integrity training. MACN cannot drive change on its own. The anonymous data helps the multi-stakeholder dialogue which is crucial to implement sustainable solutions.



Map 1: Incidents across the World



Lessons Learned from Establishing a Global Reporting System

Corruption, by its very nature, is difficult to measure and quantify. Since the launch of MACN’s anonymous incident reporting system, the network has grown significantly. Today, we are one of the largest collective action initiatives in the maritime industry. This growth has brought with it an increased adoption of MACN’s anonymous incident reporting, and we are constantly seeking ways to make our data more useful, accurate, and actionable. In 2021, with external support from the Danish Ministry of Foreign Affairs, MACN worked on optimizing and improving its incident reporting functionalities and by developing a robust data visualization capability of the reported data. In addition, MACN progressed with the development of the first ever Global Port Integrity Platform (GPIP) – a platform to measure and compare integrity in ports worldwide. GPIP will draw upon MACN’s anonymous incident data as well as other data sources to capture and display integrity risks at the port and operational level and will be launched in 2022.

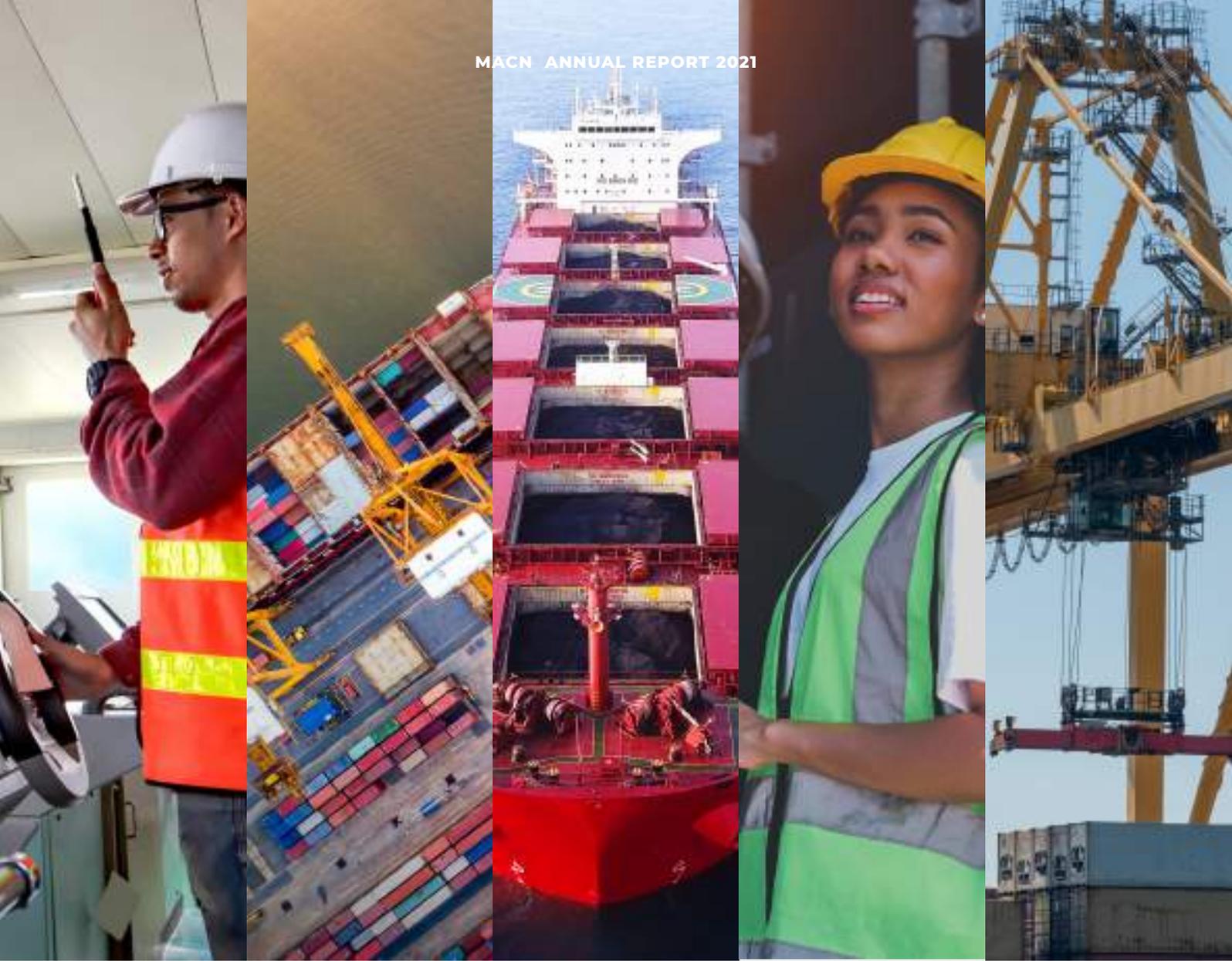
The most significant outcomes of the reporting system, based on feedback from MACN members, collective action partners, and other stakeholders are as follows:

1. The ability to prevent risks and strengthen compliance programs increases together with better knowledge of the risks.
2. The power of an escalation channel – by reporting on illicit demands we create transparency on the challenges which is the first step to any solution.
3. With increased transparency the system encourages the industry at large to take necessary actions where needed and to provide well-needed operational support.
4. The data can be used as a “door opener” for constructive dialogues between the private and public sector.

Over the course of developing the anonymous incident reporting system we believe the following lessons have been key to our platform’s success:

1. The system should be easy and simple to use To encourage front-line staff to report.
2. Define, explain, and communicate objectives of the system to meet expectations from all stakeholders (including national governments who may receive future reports).
3. Strongly consider anonymity of reporting to build trust in the reporting system itself.
4. Ensure good data governance.





Collective Action

Theory of Change

MACN believes that sustainable, transformational change requires multistakeholder collaboration and win-win solutions. Since its inception, MACN has pursued a strategy that is based on two key levers for change: First, MACN strengthens members' internal anti-corruption management practices and programs. Secondly, MACN contributes to improvements in the external operating environment. This dual approach recognizes that, in the absence of changes in the operating environment, internal improvements on their own are unlikely to yield the desired outcomes. To carry out its mission, MACN looks to form relevant partnerships and develop outcome and impact measures.

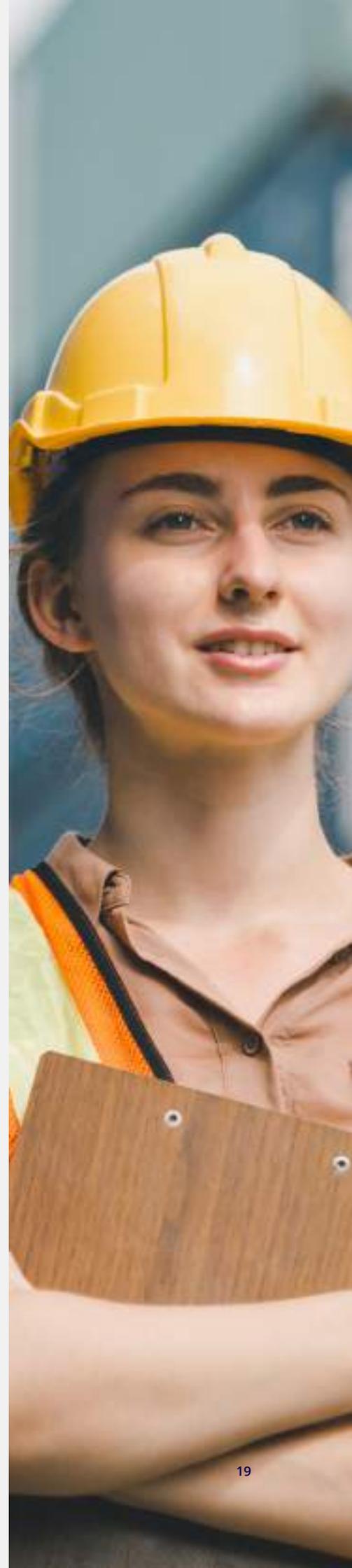
At the core of MACN's work are collective action initiatives. Here, member companies unite with stakeholders including port and customs authorities, NGOs, and local government to implement a range of group programs to directly address corruption risk in ports. Overall, MACN's collective actions have proven to be an impactful, effective, and cost-efficient way to promote trade and transparency and to engage private sector leadership on combating corruption and bribery in the port and maritime sector.

Even if all companies have an internal defense against unethical practices, challenges will continue to exist in the operating environment as long as the root causes of corruption go unaddressed. Collective Action is an important tool to help the private sector take proactive steps to tackle corruption. From initial root-cause analysis through to collective action initiatives, MACN members work in partnership with local authorities to develop solutions that are both beneficial to all and realistic to implement.

Collective action strategy

MACN has implemented collective action initiatives since 2012. In the early days of MACN, the membership conducted the mapping of geographical hot spots where the industry faced corrupt demands. This exercise, in combination with MACN's incident reporting data and member feedback during member meetings guided, and still guides, MACN's country priorities in its collective action workstream.

Over the years MACN has built-up hands-on experience in successfully driving change in countries with a high risk of corruption, and we have also received recognition as a leader in developing and implementing international collective action initiatives. Moreover, MACN actively seeks member support and external funding to initiate and drive further collective actions in line with the 2025 strategy. In MACN's updated and revised in-country strategy we reflected on changes in our membership's trade patterns and to the world in which we have been operating. The collective action



strategy also aimed to be more dynamic, with MACN asking the industry (nonmembers and members) for input on relevant countries through these perspectives:

- **Frequency, Severity:** Countries and ports targeted are those where the maritime industry experience severe and frequent integrity challenges, and who are willing to address the problem.
- **Relevance:** Countries and ports targeted are those that have business relevance for the maritime industry looking 3-5 years ahead from a maritime trade perspective.
- **Commercial Leverage:** Countries and ports targeted are those where MACN has a critical mass of commercial leverage to change behaviour through collective action.
- **Feasibility:** MACN assess the opportunity for driving change in collaborating with local stakeholders, and the drivers for this commitment, for example., local political commitments to the anti-corruption agenda and to trade facilitation.

Before starting collective action initiatives, MACN always assess the potential to find trusted local partners who can lead these efforts, and who have expertise across MACN's issues areas.

MACN's in-country collective action work is further assessed by results which need to be reflected through the following factors:

- **Impactful** - Deliver result-focused initiatives that improve the operating environment and reduce corruption.
- **Industry lead** - Increase participation of MACN members in initiatives by focusing on countries where members face challenges and do regular business.
- **Inclusive** - Increase collaboration with key stakeholders such as governments, civil society, and the local maritime value chain.

Established Projects





Argentina

Challenge: Shipping companies operating in Argentina faced challenges in connection with the inspections of holds and tanks, customs declarations, and on-board inspection practices. Data from MACN member companies highlighted a systemic issue with cash demands for payment for unclean grain holds, including cases of extortion.

Partner: Bruchou, Fernández Madero & Lombardi

2014

Launch of collective action with Governance Latam (now Bruchou Law Firm), the local partner

2015

Multi-stakeholder coalition building with engagement from local and international industry players and public authorities

2017

New regulatory framework for the inspection of holds
Project funding received to implement integrity training

2018

Training of public officials, private surveyors, and agents
Standardization of customs forms with a General Resolution adopted by the Argentine Customs Authorities

2019

MACN members and industry report a 90% drop in corruption incidents related to holds inspections

2020

Resource guide for industry published on the new holds inspection system

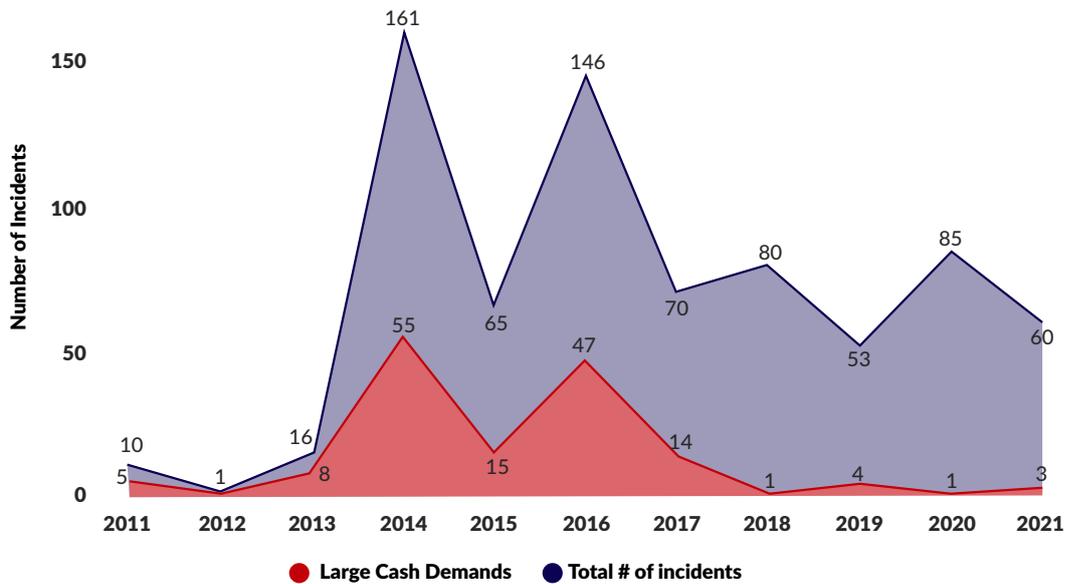
2021

90% drop in corruption incidents related to holds inspections is maintained and confirmed by MACN members and industry data



Progress

MACN has continued the collective action initiative through a multi-stakeholder approach in coordination with the authorities, local, and international industry operators. We have sustained dialogue and experience-sharing with Centro de Navegación and collaboration was strengthened with an MoU. We promoted and coordinated the drafting and filling of joint opinions in relation to Senasa’s new regulations applicable to holds inspections and garbage disposal procedures. MACN will continue engaging in a dialogue with Senasa to promote the development of a handbook detailing technical aspects and setting out clear standards for inspections.



We also continue to assist MACN members during port calls and, as a result of ongoing efforts with local and government stakeholders, we have observed a continued low level of corruption incidents. MACN’s data shows that seven incidents related to surveyors (private and Senasa) have been reported in 2021 which is 50% less than in 2020, and only three large cash demands were made which all involved surveyors. The 2021 data confirms the drop in large cash demands achieved in 2018 has been sustained.



Summary

In 2021, MACN welcomed more Argentina-based members which strengthens the Collective Action initiative. Through ongoing and effective dialogue with stakeholders, MACN has actively contributed to escalating and resolving incidents, and supporting stakeholders to follow and enforce the applicable procedures. MACN will keep monitoring changes in regulations and challenges with other actors such as customs and sanitary authorities.



Nigeria

Challenge: MACN identified Nigeria as one of the most challenging countries in which to do business. Corrupt demands posed a major risk to member companies that faced cases of extortion, harassment, and threats of violence. Moreover, regulations and procedures in ports were lacking in detail and consistency, giving authorities wide discretionary powers.

Partner: The Convention on Business Integrity (CBI)

2012

In cooperation with UNDP and the Nigerian Government MACN launched its first ever Collective Action project

2013

Root cause analysis report and action plan published after risk assessment conducted executed locally by TUGAR

2014

Nigerian Project Steering Committee selected and trained in anti-corruption

2016

CBi became MACN's local partner
The Nigerian President approved Standard Operating Procedures (SOPs) and grievance mechanism

2017

1000 port officials were trained in ethics and integrity

2019

Funding received from DANIDA to address low awareness of SOPs and the grievance mechanism launched by Nigerian Authorities
MACN launched the local Help Desk for vessel operators

2020

Funding received from The Siemens Integrity Initiative to tackle corruption in cargo clearance
Launched an anti-corruption HelpDesk to support businesses involved in cargo clearance

2021

Operationalization of the Port Standing Task Team with the Nigerian Shippers Council, The ICPC, and the Nigerian Ports Authority
Launch of National Integrity Alliances with over 120 port users
Delivered capacity building workshops on Leadership, Ethics and Anti-Corrupt Practices for over 100 government officials



Progress

The anti-corruption solutions adopted by the Nigerian government are the result of several years of engagement with the Vice President's Office and key governance agencies by MACN and CBI. MACN and CBI also supported the Nigerian Shippers' Council as they made the case to the Presidency for the implementation of an official **Nigerian Ports Process Manual (NPPM)**.

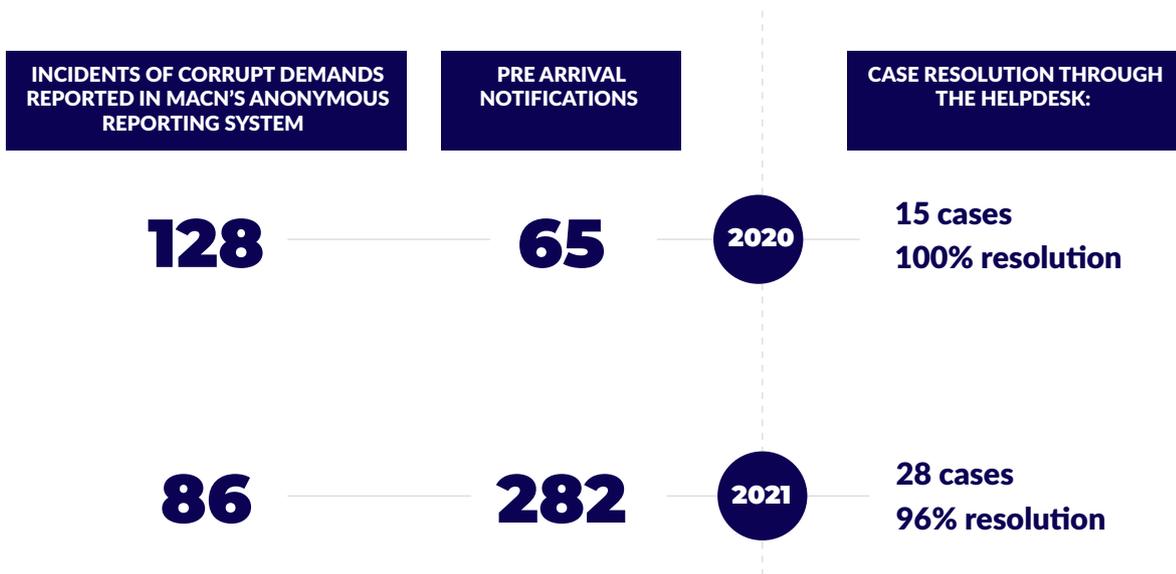
The resulting 2021 solution landscape is a combination of the following:

- Federal Government of Nigeria launched the NPPM and Formation of the Port Standing Task Team (PSTT) which was implemented across Nigeria.
- **The Port Service Support Portal (PSSP), MACN Local HelpDesk, and User Experience Diary** were developed as support and incident escalation mechanisms.
- Business Ombudsman-like function was implemented by the Nigerian Shippers' Council (NSC)
- An Accountability Mechanism was facilitated by the PSTT
- Compliance functions were appointed in each agency and location to strengthen the Accountability Mechanism.
- MACN and CBI developed and delivered Leadership and Ethics training to over 100 government officials.
- MACN and CBI created an Integrity Alliance with over 120 local port users. Membership is based on signing up to a Code of Conduct, with a strong urge to the local members to report corruption and conduct business with integrity.
- MACN and CBI developed the Nigerian Maritime Standard Operating Procedures **SOP Toolkit** to support MACN members and local port users to prepare for port operations prior to calling or using Nigerian seaports and terminals.



 **Summary**

The development of a results-based solution landscape has empowered the private sector and reduced the risk and associated costs to vessels and companies. In 2020/2021 we witnessed a reduction in the number of incidents reported through MACN’s anonymous incident reporting system. The usage of the Helpdesk and the Nigerian PSSP has increased over time. The below illustration shows pre arrival notifications (i.e., the vessel is calling a Nigerian port). Please note that a pre arrival notification does not indicate a corrupt demand. Since the launch of the HelpDesk over 460 pre notification arrivals have been processed through the system.



Prior to the Helpdesk operation, case resolution took up to 7 – 10 days. In 2021 MACN reported an average case resolution time of 1 – 8 hours. For a shipowner the operational costs (staying in port, being delayed, processing paperwork) have therefore been reduced from approximately USD150,000 – USD 20,000 per port call.



Ukraine

Challenge:

MACN's initial root cause analysis of corruption related to Port State Control, and ecological control indicates that the corruption is systemic, and maintained by a network of individuals across several government agencies. When it comes to the ecological inspection the vessels, stakeholders claim that this semi-organized network enjoys high level government support. In addition, shipping companies operating in Ukraine face frequent challenges in connection to documentation and onboard practices (e.g. waste disposal, ballast water discharge). Port authorities such as customs officers, Port State Control, and ecological inspectors were the main government representatives engaged in practices involving corrupt demands during 2019-2020. The majority of corrupt demands were for large cash payments and rejecting these lead to heavy delays of vessels and the threat of fines for alleged non-compliance. As a result of ANK's involvement and the work of the MACN HelpDesk, the situation around the ecological control of vessels has improved. The Ukrainian Government amended the Rules of Protection of Sea Waters in Ukraine. During 2021 and early 2022, no reports related to ecological control of vessels calling Ukrainian ports have been received.

In recent years, Ukraine has made great efforts to tackle corruption on the regulatory side. However, until today the regulatory framework in the maritime sector is not sufficiently enforced and companies continue to face such corrupt demands. According to MACN HelpDesk reports, the main corruption challenges are concentrated within customs control (namely, control of ships' stores) and Port State Control.

Partner: ANK Law Office (ANK)

2019

Mapping of local stakeholders in Ukraine

Risk assessment of corruption challenges in Ukrainian ports

Co-funding received from Lauritzen Foundation and Orient Fond to conduct a risk assessment, and to map the challenges in Ukraine, including guidance on key legislation effecting the maritime industry

2020

Funding received from DANIDA to further develop the collective action initiative

ANK Law Office (ANK) was identified as local partner

MACN launched the local Help Desk

MACN published the first set of guidelines related to control of vessels' ballast by ecologists

2021

MACN starts to engage with national authorities to strengthen integrity in ports

Increased use of the local HelpDesk, several cases are challenged in court serving as precedence for future cases

**Progress:**

At the end of 2021, MACN and ANK met with key public-sector stakeholders, including the Ukrainian Sea Port Authority (USPA) represented by the Head of Odesa Port Administration, local MACN members, Maritime Chamber of Ukraine, Association of Odesa Port Operators, and other local private sector stakeholders to better understand and assess the operating environment and challenges in the ports and terminals sector.

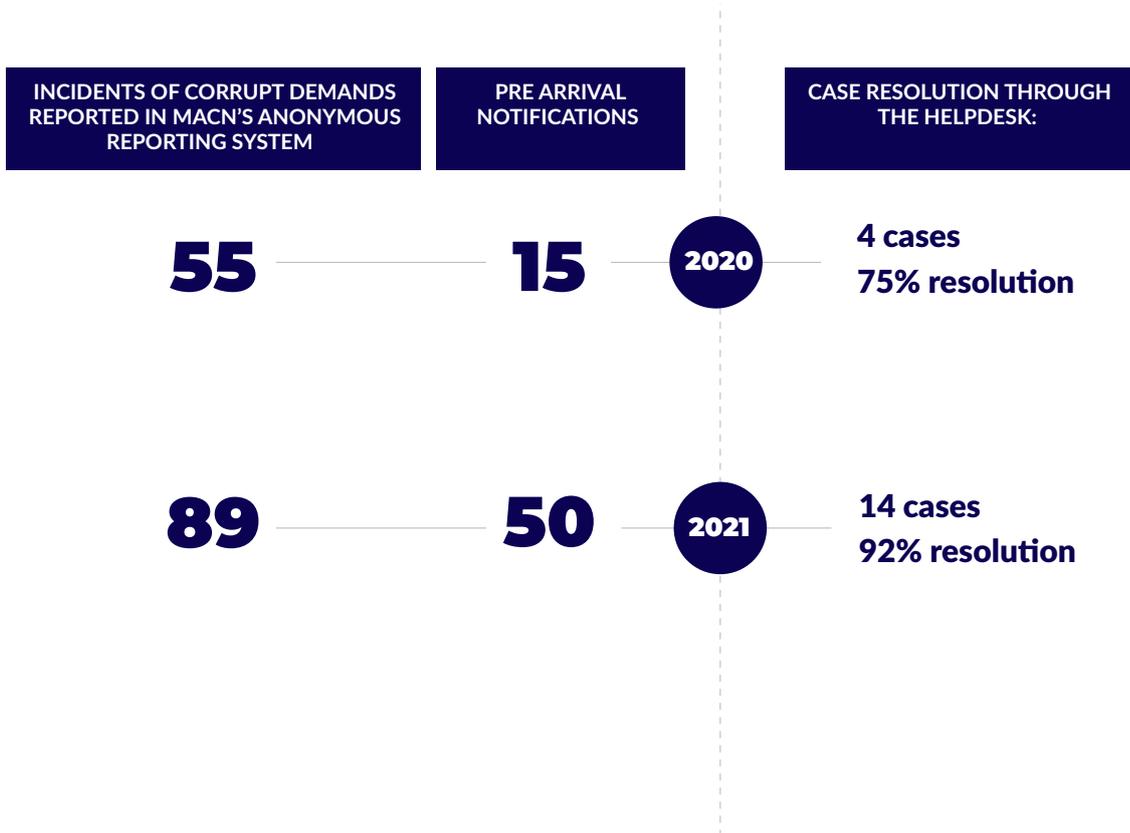
As part of building connections into civil society, MACN and ANK developed the following initiatives:

- Agreeing and signing a Memorandum of Understanding (MoU) with the Maritime Chamber of Ukraine (MCU). MCU is a non-governmental organization established by local maritime stakeholders involving leading port operators, shipping companies, shipping agents, maritime trade unions, shipyards, and crewing agencies.
- Engaged in an MoU with the Marine Transport Workers' Trade Union of Ukraine (MTWTU), which is affiliated to ITF.
- Presented our work at the National University "Odesa Maritime Academy" (OMA), which is the leading university in Ukraine for preparation of shipmasters and marine engineers for the merchant fleet.
- Initiated a revision to the port integrity risk assessment in Ukrainian seaports. As a result of this assessment, a guide on ecological, customs, port state control inspections, and advice on ballast water regulations was developed. ANK communicated with the Maritime Administration of Ukraine assisting to improve reaction to corruption notices received through the Administration's website.
- A joint letter of proposals for consideration was submitted to the respective ministries to align maritime legislation and practices to EU and international standards. This dovetailed with work by the Federation of National Associations of Ship Brokers & Agents (FONASBA) and the International Group of Protection and Indemnity (P&I) Clubs.
- The "White paper on Seaports Development - Challenges and potential solutions", was developed by the European Business Association (EBA) in collaboration with MACN, providing a guide for Ukraine's seaports industry. This handbook establishes a long-term action plan to transform the port industry and continuously improve its service delivery at seaports.



Summary

With the introduction of a fully operational local HelpDesk in July 2020, we have seen a rapid increase in members using this support.



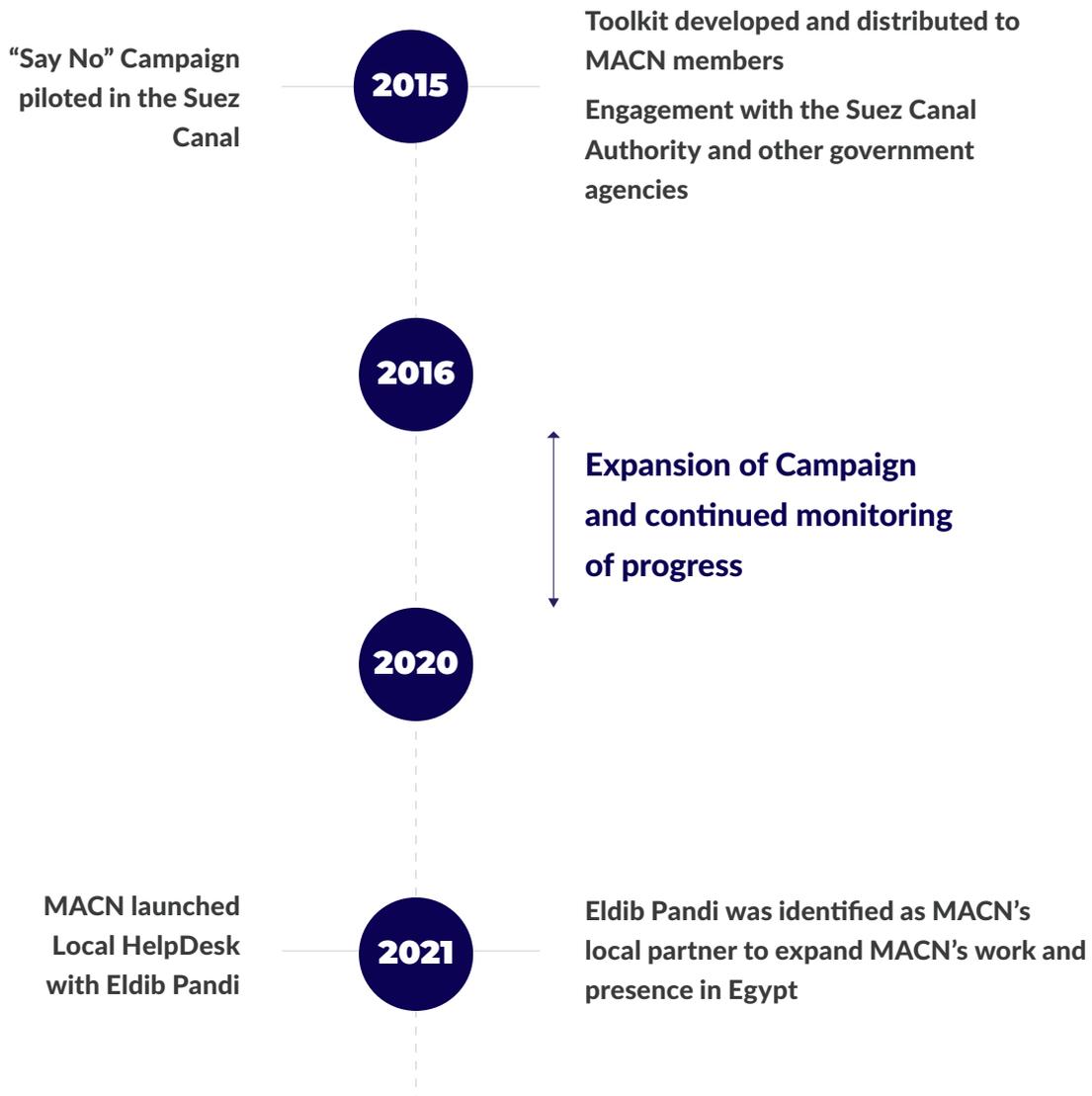


Egypt

Challenge:

Tackling corruption demands in Egyptian ports and waterways, Captains frequently face demands for facilitation payments for the right of passage and have regularly struggled with demands for cigarettes and small cash sums. The MACN anonymous incident data verifies these findings and highlight the challenges crew and vessel s face to avoid safety hazards or lengthy delays.

Partner: Eldib Pandi (ELDIB)





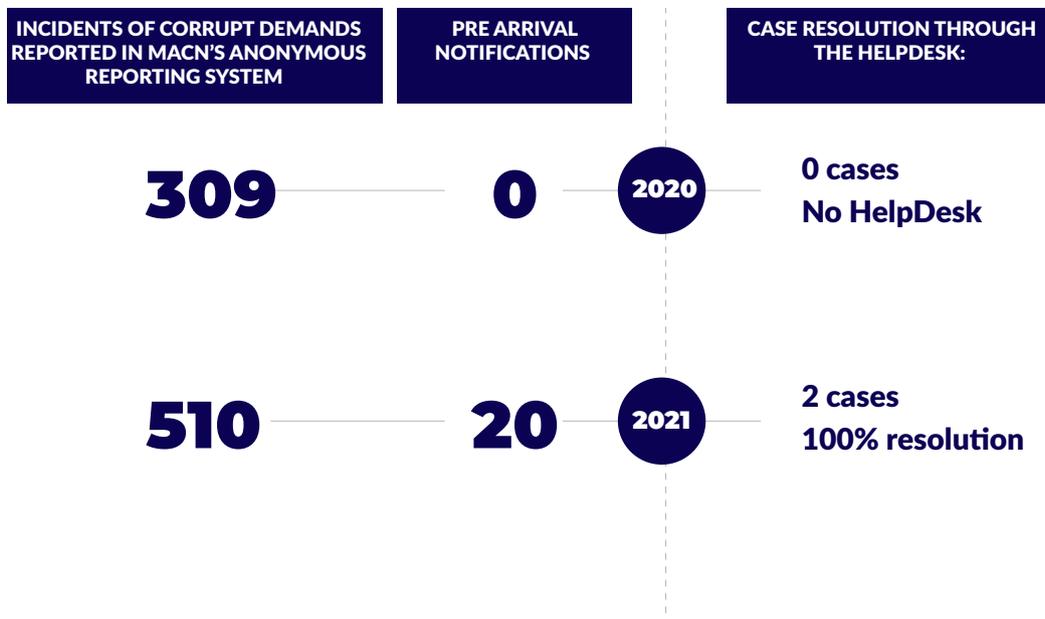
Progress

Following MACN’s ‘Say No’ campaign of 2015, reported incidents saw a visible decline with demands for cigarettes and threats to the safety of the crews and the vessel decreasing. The ‘Say No’ campaign demonstrated how collective action can play one of the most vital roles in addressing and fighting corruption, delivering tangible improvements to the operating environment for crew, companies, frontline staff, and local stakeholders.

In September 2021, MACN, in partnership with ELDIB, set up its local HelpDesk in Egypt. This enabled MACN to address an increase in recent incidents as well as general concerns of Network members. By the end of 2021 the HelpDesk had received 20 incident calls and responded to and resolved two incidents.



In summary:





India

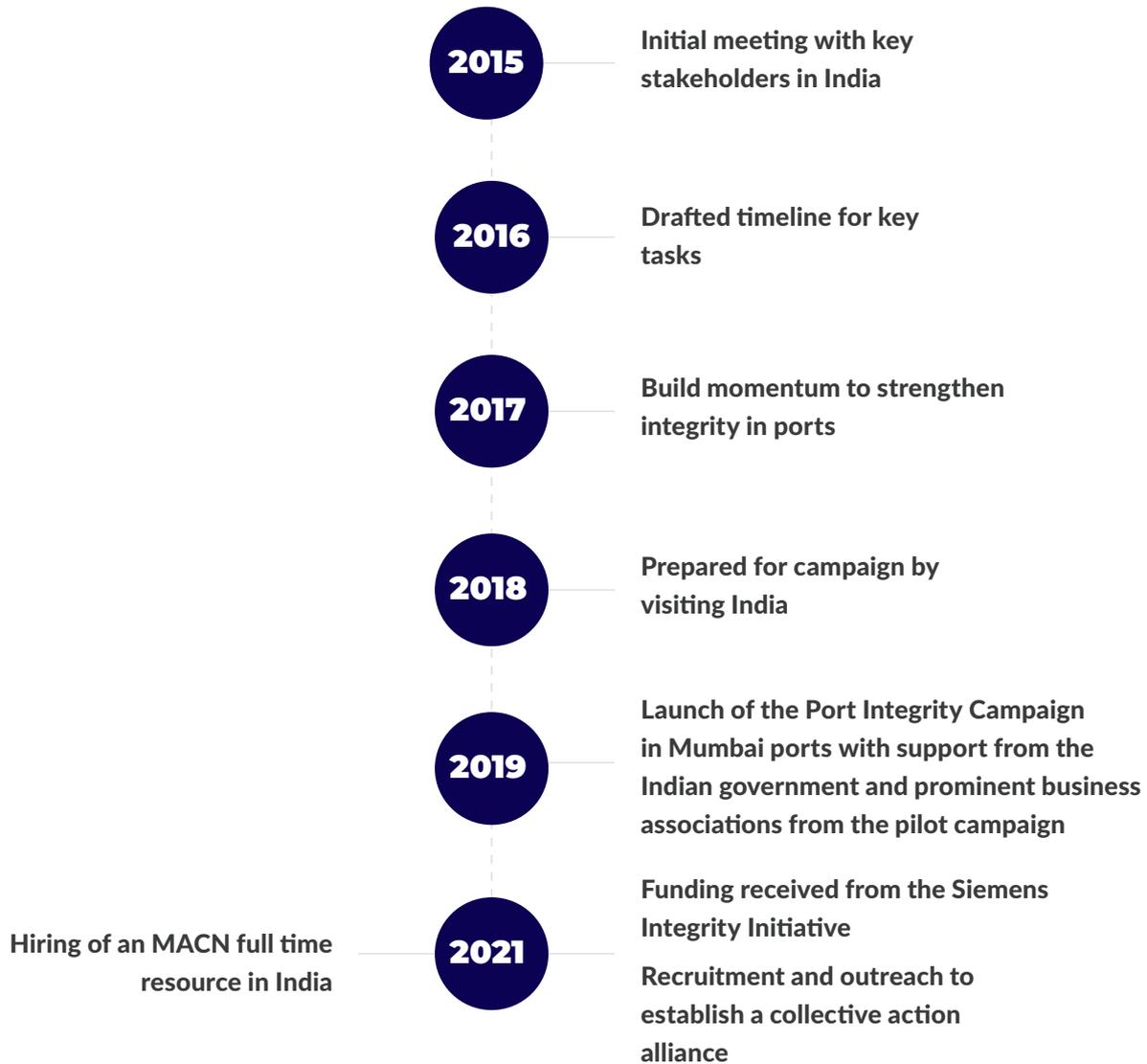
Introduction to the collective action initiative:

In 2019, MACN started building momentum in India with the launch of a Say No Campaign which aimed to reduce integrity issues and bottlenecks to operations in Indian ports. The campaign involved the Indian Government, MACN members, and local industry stakeholders in Mumbai ports (MbPT and JNPT) and was successfully tested for six months. The expansion of the Port Integrity Campaign has been made possible by strong commitment from the Indian Government to work with the private sector and to address integrity issues in Indian ports. In addition to the recruitment of private sector companies and key business associations, formal dialogue has been initiated with the Indian authorities. We are seeing support for MACN's work across all stakeholder groups, and the launch of a Say No campaign in the port of Chennai in 2022 is being prepared. The Chennai campaign will serve as a way to pilot the HelpDesk and deploy MACN's training tools locally.

Challenge

MACN's incident data shows that requests for small in-kind payments (for example cigarettes, alcohol, and soft drinks) are frequently made. Rejecting such demands leads to threats of delays to the vessel and threats of fines for alleged non-compliance. Some vessels have also reported denial of shore passes for crew. Further, problems have been reported relating to the burdensome documentation processes. One of the key ambitions of the Government of India is to improve the national business climate in their Ease of Doing Business plan. MACN's proposals and ideas for strengthening integrity at ports are timely and align closely with the priorities of the Government.

Partners: Indian National Shipowner's Association (INSA), and the UN Global Compact in India



Progress

In 2021, MACN initiated a new project in India, funded by the Siemens Integrity Initiative, to establish a local Collective Action Alliance that will deploy MACN's Collective Action tools and methodology. MACN has launched a communications campaign about the project and engaged the industry to recruit private sector participants and key business associations to join the Collective Action Alliance.

Together with the Indian National Shipowners Association (INSA) and the UN Global Compact in India we have begun activities related to capacity building, public-private partnerships, and stakeholder dialogue. MACN also hired its first full time employee outside of Denmark to expand operations closer to the needs of the membership and local partners.

New Projects





Bangladesh

Introduction to the collective action initiative

MACN is partnering with UN Global Compact (UNGC) in Bangladesh to establish a national Collective Action Alliance to create a platform for dialogue with authorities on how to address current gaps in legislation and operational practice in ports. MACN will deploy a number of tools that can help the private sector resist and report corruption and enhance compliance practices.

By taking Collective Action and forming an alliance, the industry gains leverage and momentum to curb corruption and create a better business environment in Bangladesh. Additionally, those who join the alliance will get access to valuable compliance tools and MACN's Integrity training to help comply with ever-tightening global anti-corruption laws.

Partner: UN Global Compact Network in Bangladesh (UNGC)

Challenge

In Bangladesh companies are frequently exposed to corruption risks. Resisting and reporting corruption to the authorities includes the risk of repercussions: delays, illicit fines, and even threats of delicensing companies. Locally, there is limited public-private sector integrity dialogue in the maritime sector and no immediate mechanism to monitor and address integrity challenges in maritime trade. Corruption is pervasive at many levels of society, and enforcement of anti-corruption legislation is low. Facilitation payments are illegal but common practice, which increases the risk of corrupt demands in ports.

Progress

Following project funding from the Siemens Integrity Initiative, MACN took decisive first steps in 2021 by establishing a new collective action initiative in Bangladesh and conducted an initial assessment of corruption risks in Bangladesh with input from the maritime industry. MACN drafted a Code of Conduct to build an alliance with relevant stakeholders (including ship owners, port agents, exporters, business associations and other supply chain partners). MACN worked with UNGC in Bangladesh to focus on the recruitment of international and local companies for this initiative. MACN held over a dozen bilateral recruitment calls, held a virtual recruitment and launch webinar, and started to plan for in-person events in a post-Covid era in 2022.



Pakistan

Introduction to the collective action initiative:

In 2021, MACN scaled up its Collective Action in South Asia and launched a new initiative in Pakistan with funding from the Siemens Integrity Initiative. The aim of this action is to establish local Collective Action Alliances and deploy MACN's compliance tools and methodology. These tools will help empower the private sector to resist and report corruption. Together with UNGC Pakistan we have reached out to all major shipping companies and agencies and arranged webinars and meetings to recruit industry players and create a local Integrity Alliance.

Partner: UN Global Compact in Pakistan

Challenge:

In Pakistan, bribery and corrupt practices are common and there is a lack of supporting infrastructure and tools for business to coordinate Collective Action. There are also low levels of integrity and an inefficient monitoring mechanism, which poses a risk to companies operating in the country. Although reporting from Pakistan has been limited, incident data suggests that shipping companies calling Pakistani ports face frequent illicit demands for small in-kind payments such as cigarettes, alcohol, and soda drinks being the most common. Rejecting such demands leads to delays in vessel operations and, in some cases, threats of fines for alleged non-compliance. The industry has also highlighted challenges around potentially fraudulent shortage claims, particularly relating to liquid cargo.

Progress

In 2021, MACN and UN Global Compact Pakistan initiated bilateral meetings with key national stakeholders such as customs and various national business associations. By initiating dialogue with key national stakeholders, we have taken a first step towards increased in-country engagement.

Workplan Expansion and Donor Partnerships

MACN believes that every stakeholder has role in building a sustainable and inclusive society. Support from governments, donors, and other international stakeholders is a critical part of MACN's anti-corruption and Collective Action country initiatives. The support from donors both encourages and further motivates business to engage with MACN, and opens doors to peer governments in high-risk markets to take part in driving change. We believe a model of cooperation that crosses between international and national business, between governments and the private sector, and government-to-government is one of the fundamental aspects of MACN's demonstrated successes. Because of our private donor support, we have been able to pilot innovative and new ideas that have then become permanent workstreams financed with MACN's own membership revenue.

To date, MACN has received funding from a long list of government and private foundation donors. Diverse funding enables MACN to deepen our engagement in priority areas and to independently pursue our mission.

We greatly value these contributions to our work and express our sincere gratitude to our supporters. MACN has to date been supported by several donors including:

- Ministry of Foreign Affairs of Denmark
- Foreign, Commonwealth & Development Office
- United Nations Development Programme (UNDP)
- Siemens integrity Initiative
- Danish Maritime Fund
- TK Foundation
- Lauritzen Fonden

The coming five years will be decisive for MACN to scale and improve anti-corruption compliance in the industry and achieve measurable reductions in corruption in MACN's collective action countries – this at a time when inclusive trade agendas are contested, and protectionism has increased.

There is great potential for scaling up MACN's collective action portfolio, by expanding the geographical scope of the collective action projects, and by formalizing and strengthening

the tools and resources utilized for implementing collective actions. Our work illustrates that anti-corruption initiatives targeting ports can have an impact on a wide variety of different industries and across supply chains and societies. Ports are discrete locations, with a limited number of stakeholders, where change and impact can be brought about rapidly. Furthermore, legal approximation, streamlining of procedures and policies in ports are facilitated by the fact that many of the rules and regulations that exist in ports are already defined by international maritime laws and regulations, and therefore do not have to be re-invented.

By supporting MACN, donor partners can promote anti-corruption compliance and a culture of integrity in the private sector and invest in collective action initiatives driving measurable reductions in corruption in ports worldwide through public-private collaboration.





Capacity Building

Innovation: tools and support

MACN recognizes that members and the wider industry must continuously work to strengthen their internal anti-corruption and risk management programs to be compliant with the ever-tightening regulatory framework. MACN does not vet or certify company's compliance programs but carefully evaluates a company's genuine intention to become a member. When they are a member, MACN supports anti-corruption compliance maturity. Following the MACN Anti-Corruption Principles, MACN develops shared methodologies and programs including:



1. Compliance Program requirements (e.g. ABC policy, top level commitment).



2. Proportionate Procedures (e.g. integrated procedures in the business and operation to mitigate corruption risks).



3. Risk assessment on legal exposure to corruption and corrupt demands.



4. Training and internal and external communications on anti-corruption policies and procedures.



5. Monitoring and Internal Controls (e.g. good governance on program implementation and continued follow ups and monitoring of program implementation).



6. Reporting, discipline, and incentives (e.g. enable reporting of misconduct, build incentives for ethical behavior, and enforce disciplinary actions in case of misconduct).



7. Due diligence on third parties, including agents, partners, and suppliers.

Combined, these steps and tools help each member company strengthen its internal processes and company-wide approaches to tackling corruption. MACN's principles align well with critical international and national legal frameworks and provide a solid start for members on the compliance journey. MACN has also implemented an annual self-assessment to demonstrate progress against the MACN principles. The assessment was first offered as a voluntary effort but became mandatory after a few years.

eLearning revisions

In 2021, MACN revised its portfolio of eLearning modules. Over 17,000 member employees have now taken part in MACN's eLearning and 17 companies have implemented the training on their own learning management platforms.

The eLearning module for Port Agents was subject to an extensive revision process to better capture the nature of the risks that port agents face on a day-to-day basis. In Q3 2021 we carried out interviews with our port agent members to capture both experiences and anti-corruption best-practice. These interviews formed the basis of the new training cases, and the eLearning course was piloted in early 2022.

Training toolbox

In 2021 we started to work on a toolbox for training managers. This resource will focus on the skills they need to train others in their organization in anti-corruption. This toolbox will contain a handbook which is designed for small groups and includes case studies and a slide-deck with key anti-corruption basics.

Third Party Risk Management

In 2021 we continued work on our third-party due diligence solution. Our vision is that this new tool will make it considerably easier for companies in the maritime sector to implement a robust compliance culture by better managing the risks stemming from working with and appointing third parties.

Due diligence can easily become a box-checking exercise that often leads to unnecessary and burdensome processes that do not necessarily reduce the risk of corruption or cause better risk management practices.

Over the last three years, we have carried out several interview series with MACN members on their due diligence needs. We are currently working to tailor the due diligence platform to better reflect our membership's needs, and to ensure the effectiveness and security of the platform. We are also working to strengthen data governance and oversight mechanisms, following membership feedback.

MACN's due diligence tool will make robust due diligence transparent, less burdensome, and more effective. We will focus on implementing a community/membership sharing element on the platform and will invest part of the cost back to high-risk markets to ensure we continue to build local capacity to mitigate genuine risks of corruption.



International Chamber of Shipping

Shaping the Future of Shipping

Collaboration

Chris Oliver is the Principal Director Marine – Head of the Marine Department

In 2017, MACN together with the International Chamber of Shipping (ICS), initiated a cross-industry working group with the ambition of attracting engagement from prominent industry organizations and associations to collaborate and address key corruption issues in the shipping industry. By the end of 2017, the working group was well established and in 2018 the group continued to work on raising awareness of maritime corruption.

The International Chamber of Shipping (ICS) is the global trade association for shipowners and operators, representing the world's national shipowner associations. The ICS acts as an advocate for the industry on issues of maritime shipping policy, operations, safety, and management. Part of our mission is also to develop best practice in the industry, and it is here that we see strong alignment with the goals and mission of MACN.

In 2019 the International Maritime Organization (IMO) - the United Nations specialized agency with responsibility for shipping – agreed to include maritime corruption as a regular work item on its agenda and to provide guidance to address maritime corruption for its member. MACN was instrumental in forming a coalition of states and organizations who together with MACN took this forward at the IMO. This significant development showed the effectiveness of issue-driven maritime sector inter-agency collaboration and cooperation.

In 2021 and early 2022, we have seen an increasing international attention placed on anti-corruption compliance, reporting requirements, and oversight. We can only expect this regulatory focus on transparency to increase. To a large degree, the fact that the shipping industry is considered a world-leader in private sector led anti-corruption work is thanks to the work of MACN and their members. ICS is very pleased to have built a strong relationship with MACN based around shared goals and the vision of a corruption-free maritime sector.

We congratulate you on ten years of world-leading progress, and we look forward to working with you to make the industry safer.



John Sypnowich

Member of the Board and Chair of the MACN Board 2014 - 2022

MACN: Reflections and looking ahead

At the Members Meeting in April 2022, I stepped down after eight exhilarating years on the Board of Directors of MACN and four years as Chair. It has been an amazing journey. Over this time, we have grown from a handful of companies to close to 170 (end of 2021), representing more than half of the world's shipping industry. We have moved from being a great idea to becoming the pre-eminent industry led anti-corruption movement in the world. We have given our members the tools to fight corruption, through the creation of practical innovative tools and an eLearning platform. We have developed an incident reporting database which has logged more than 50,000 incidents and we have launched a Global Port Integrity Platform. We have undertaken projects which have addressed (and solved) real problems of corruption through collective actions throughout the world, in Nigeria, Indonesia, Ukraine, Argentina, The Suez Canal, China, and elsewhere. We have taken MACN from its status as a project to an independent legal entity, fully able to grow and expand for the next step in its evolution.

I have had the honour to work with an amazing team, from fellow Board members Ann Shazell, Rajesh Unni, Brendon Hawley, Dorte Rolff, Kevin Grant Leach-Smith, and Oistein Jensen, to the outstanding MACN organization led by the amazing Cecilia Müller Torbrand, to whom we owe so much of the success to MACN, and her dedicated team of Martin Benderson, Vivek Menon, Jonas Sørberg Erlandsen, Anna DeVries, Silvia Grandi, Flora Caia, Mathias Bak, and Marlene Wegener. It has been an honour to represent such an amazing organization and to work with such a talented team.

I am excited for the future of MACN, and with Ann Shazell taking the Chair and Rajesh taking the Vice Chair, I know that, together with Cecilia and her team, they will continue to lead MACN to greater and wider success. It has been a fantastic journey so far, and we have come a long way. But we have a lot still to do. I know, though, that we have the energy, the ideas, and the will to get it done and that we can say, with some hope and a lot of pride, that we are getting closer and closer to our goal of a maritime industry free of corruption.

Annex I - ESG 2021 Report

Topic	Accounting Metric	Unit of Measure	Data	Code
Data Security	Description of approach to identifying and addressing data security risks	Explanation	An external review of MACN data security risks was done in 2022 and mitigating actions are being implemented.	SV-PS-230a.1
	Description of policies and practices relating to collection, usage, and retention of customer information	Explanation	MACN has a specific customer service platform to manage our members data and information. This platform WebCRM complies with relevant GDPR requirements. We also use NDA when relevant.	SV-PS-230a.2
	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	Percentage %	Zero	SV-PS-230a.3
Workforce Diversity & Engagement	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Percentage %	Gender diversity: Secretariat: 50% female Board level: 38 % female (including CEO)	SV-PS-330a.1
	Employee engagement as a percentage	Percentage %	We do not run engagement survey due to the size of the organisation. Instead we have individual check ins and we have weekly follow ups.	SV-PS-330a.3
Professional Integrity	Description of approach to ensuring professional integrity	Explanation	We have a MACN Code of conduct for staff and business parties. The Code of conduct is included in all contracts and all staff has to review and confirm MACN's values in accordance to the Code of Conduct.	SV-PS-510a.1
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity	Percentage %	Zero	SV-PS-510a.2
Topic	Activity Metric	Unit of Measure	Data	Code
	Full time employees	Number	6	SV-PS-000.A
	Part time employees	Number	2	SV-PS-000.A
	Contracts	Number	3 contracts to manage the Secretariat services. 7 Collective action partners on contracts in Argentina, Bangladesh, Egypt, India, Nigeria, Pakistan, Ukraine.	SV-PS-000.A
	Employee hours worked, percentage billable	Percentage %	Employee hours vary depending on project and workloads. We monitor the workload of staff on a weekly basis and in individual dialogues. We don't run engagement surveys due to our small organisation.	SV-PS-000.A

Topic	General disclosures	Response	GRI Code
Organisational profile	Name of the organisation	Maritime Anti-Corruption Network (MACN)	102-1
	Activities, brands, products and services	https://macn.dk/	102-2
	Location of HQ	Copenhagen, Denmark	102-3
	Location of operations	Argentina, Bangladesh, Denmark, Egypt, India, Nigeria, Pakistan, Ukraine	102-4
	Ownership and legal form	Membership association	102-5
	Markets served	EMEA, Americas, Asia	102-6
	Scale of the organisation	https://macn.dk/	102-7
	Employees and workers	8	102-8
	A description of the organisation's supply chain	We run in country projects in multiple countries to mitigate corrupt demands in maritime trade. We contract with partners globally. We also have service providers who managed our technical platforms such as eLearning.	102-9
	Significant changes	In 2021, MACN transformed to a independent legal entity with its operation in Denmark.	102-10
	Precautionary Principle	The Precautionary Principle is applied in our day to day scope of work and in dialgue with our members.	102-11
	External initiatives	B20 Task force and WEF PACI working group participant	102-12
	Membership of associations	None	102-13
Strategy	Statement from senior decision maker	This can be found in our annual reports available on www.macn.dk .	102-14
	A descprtion of key impacts, risks and opportunities	This can be found in our annual reports available on www.macn.dk .	102-15
Ethics and integrity	Values	Link to o our Code of Conduct can be found on www.macn.dk	102-16
	Ethics mechanisms	MACN has a dedictad email speakup@macn.dk which is monitored by the Board. If relevant any investigation can be executed by external legal counsel assigned by the Board.	102-17
Governance	Governance structure	The Board is based of members of MACN and elected on a 4 year term. The CEO is responsible for day to day activities and reports to the Board.	102-18
	Delegating authority	The CEO has delegated authorities from the Board as stated in MACN's bylaws	102-19

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Topic	General disclosures	Response	GRI Code
	Executive level responsibility	The CEO is responsible for the social, economic and environmental topics and reports to the Board	102-20
	Stakeholder consultation	No formal consultation is undertaken	102-21
	Governance body composition	The Board consists of MACN member representatives as per membership vote and approval.	102-22
	Governance body chair	In 2021, John Synnowich served as the Chair of the Board. He was elected and approved by members vote as per MACN's bylaws.	102-23
	Governance body nomination and selection	The Board nominates candidates for members to vote on as per MACN's bylaws.	102-24
	Conflict of Interest	Conflicts of interest are managed through MACN's Code of Conduct	102-25
	Governance body and purpose, values and strategy	The Board are responsible governing MACN's purpose, mission, values, strategy, policies and impact.	102+26
	Governance body's collective knowledge	The Board members are industry experts with experience in the field of anti-corruption, legal, shipping operations or ESG.	102-27
	Evaluating governance body's performance	MACN has annual KPIs and performance indicators. The Board does not have specific performance goals.	102-28
	Identifying and managing impacts	Stakeholders (employees and members) have been engaged in identifying the topics and workstreams for MACN, and the Board regularly assesses the risks and opportunities of those topics.	102-29
	Effectiveness of risk management processes	The Board regularly reviews the effectiveness of our impact and progress against the workplan including potential risks.	102-30
	Review of sustainability topics	Due to the nature of our work, the Board focuses it reviews only the anti-corruption work done in MACN. This is done at least on an annual basis.	102-31
	Governance body's role in reporting	Selected members of the Board is reviewing the reporting included in Annex I of MACN's annual report.	102-32
	Communicating critical concerns	Critical concerns may be communicated by the Board or the CEO at any time through a range of channels. This applies equally to staff, members or other stakeholders.	102-33
	Nature and total number of critical concerns	Zero	102-34
	Remuneration policies	The Board is excluded from any remuneration policies and it only applies for staff.	102-35
	Process for determining remuneration	The Board decides on remuneration for staff.	102-36

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Topic	General disclosures	Response	GRI Code
	Stakeholders' involvement in remuneration	No external consultants were involved.	102-37
	Annual total compensation ratio		102-38
	Percentage increase in compensation ratio		102-39
Stakeholder engagement	Stakeholder groups	Our stakeholder group includes our staff, our members, civil society, governments and partners	102-40
	Collective bargaining agreements	None	102-41
	Identifying stakeholders	Our stakeholders are identified on a stakeholder mapping process for each relevant working activity or project	102-42
	Stakeholder engagement	Stakeholders are engaged through online and in person meetings.	102-43
	Topics and concerns raised	Anti-corruption and integrity	102-44
Stakeholder engagement	Stakeholder groups	Our stakeholder group includes our staff, our members, civil society, governments and partners	102-40
	Collective bargaining agreements	None	102-41
	Identifying stakeholders	Our stakeholders are identified on a stakeholder mapping process for each relevant working activity or project	102-42
	Stakeholder engagement	Stakeholders are engaged through online and in person meetings.	102-43
	Topics and concerns raised	Anti-corruption and integrity	102-44
Reporting practice	Entities included	MACN	102-45
	Boundaries	Specific disclosures have not been done	102-46
	Material topics	Relevant for our mission - anti-corruption	102-47
	Restatements	None	102-48
	Changes in reporting	First time MACN reports based on GRI and SASBI standards.	102-49
	Reporting period	2021	102-50
	Most recent report	Annual report 2020	102-51
	Reporting cycle	Annual	102-52
	Contact point	cmullertorbrand@macn.dk	102-53
	Claims of reporting	This report has been prepared in accordance to the GRI standards	102-54
	GRI Index	This annex	102-55
	External assurance	This report has not been externally assured	102-56

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Topic	Specific disclosures	Response	GRI Code
Operations assessed for risks related to corruption	The reporting organization shall report the following information: a. Total number and percentage of operations assessed for risks related to corruption.	100%	205-1
	b. Significant risks related to corruption identified through the risk assessment.	Engagement of our local partners executing MACN's work locally.	205-1
Communication and training about anti-corruption policies and procedures	Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region	100%	205-2
	Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.	100%	205-2
	Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.		
Operations assessed for risks related to corruption	The reporting organization shall report the following information: a. Total number and percentage of operations assessed for risks related to corruption.	100%	205-1
	b. Significant risks related to corruption identified through the risk assessment.	Engagement of our local partners executing MACN's work locally.	205-1
Communication and training about anti-corruption policies and procedures	Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region	100%	205-2
	Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.	100%	205-2
	Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.	100%	205-2
	Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.	100%	205-2

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Topic	Specific disclosures	Response	GRI Code
	Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.	100%	205-2
Confirmed incidents of corruption and actions taken	Total number and nature of confirmed incidents of corruption	None	205-3
	Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.	None	205-3
	Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.	None	205-3
	Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases	None	205-3

