

**ANNUAL**

MARITIME  
ANTI-CORRUPTION  
NETWORK

**REPORT**

**20  
23**

# From Sanctions to Sustainability: Evolving Dynamics in Global Trade Management



Global trade and maritime transportation are facing a great balancing act, managing new interstate power alignments, outright conflict, trade pattern disruption, and regulatory oversight to a degree we have not seen in recent times.

It is becoming clear that the maritime industry is navigating increasing geopolitical uncertainty and extensive risks. From Ukraine to the Red Sea, merchant ships have been directly targeted as part of direct and proxy conflicts and companies have diverted vessels to alternate routes. New trade routes may mean new threats and managing port calls with less support infrastructure may increase corruption risks.

Sanctions, compliance, and trade rule enforcement are likely to increase for all companies involved in the moving and management of trade.

We have also seen considerable changes in the public visibility of Environment, Social, and Governance issues. There is public frustration around the perceived lack of tangible ESG results despite numerous and (sometimes) overstated corporate efforts. This has resulted in regulatory responses to related Greenwashing, and the EU Parliament passing groundbreaking legislation. Companies who are Greenwashing – making unsubstantiated claims – now face considerable penalties.

Outsourcing risks and delegating unethical behavior in high-risk markets has been a no-go for a long time. However, third-party liability is still one of the biggest challenges for companies with global operations and we see a trend from regulators to include the activities and actions of local business partners and suppliers in corporate Anti-Bribery and Corruption compliance. To comply with current laws and to prepare for more scrutiny in this field, collective action is instrumental. MACN has been successful in engaging the value chain of maritime trade and we see this important work to continue.

Over the last 24 months, MACN's work and systems flexibility have positioned us well to support the industry through these changes. Frontline training, government and regulator engagement, and investment in compliance technology have made our role in our members' governance work increasingly important.

In too many discussions, the importance of good governance is overlooked or underappreciated for its impact and measurability including how it ties into the success of areas ("the E and the S") where companies need to demonstrate impact. MACN has a key role to play, and a track record of showing concrete results at both the company and industry level.

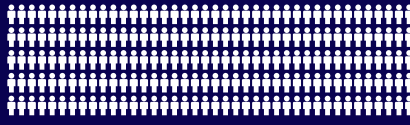


MACN CEO, Cecilia Müller Torbrand

# 2023 Impact

21

New members



We hosted an India Curtain Raiser event in Mumbai, attended by **200** people.

Our team expanded with **2 new staff members** in Copenhagen.



We hosted **2** large member meetings in Copenhagen and Mumbai, attended by close to **300** participants in total.

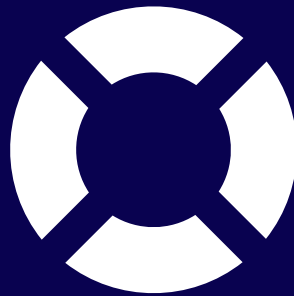
100%

Resolved cases

MACN training made available for **subagents, non-member third-party agents, and P&I correspondents**

19

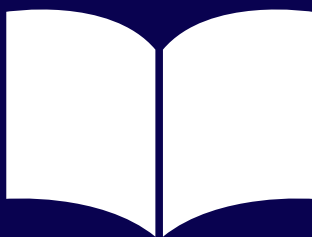
Crew seminars



**1.471** uses of HelpDesk

Number of incidents

5.184



Launch **1st Insider Bulletin**

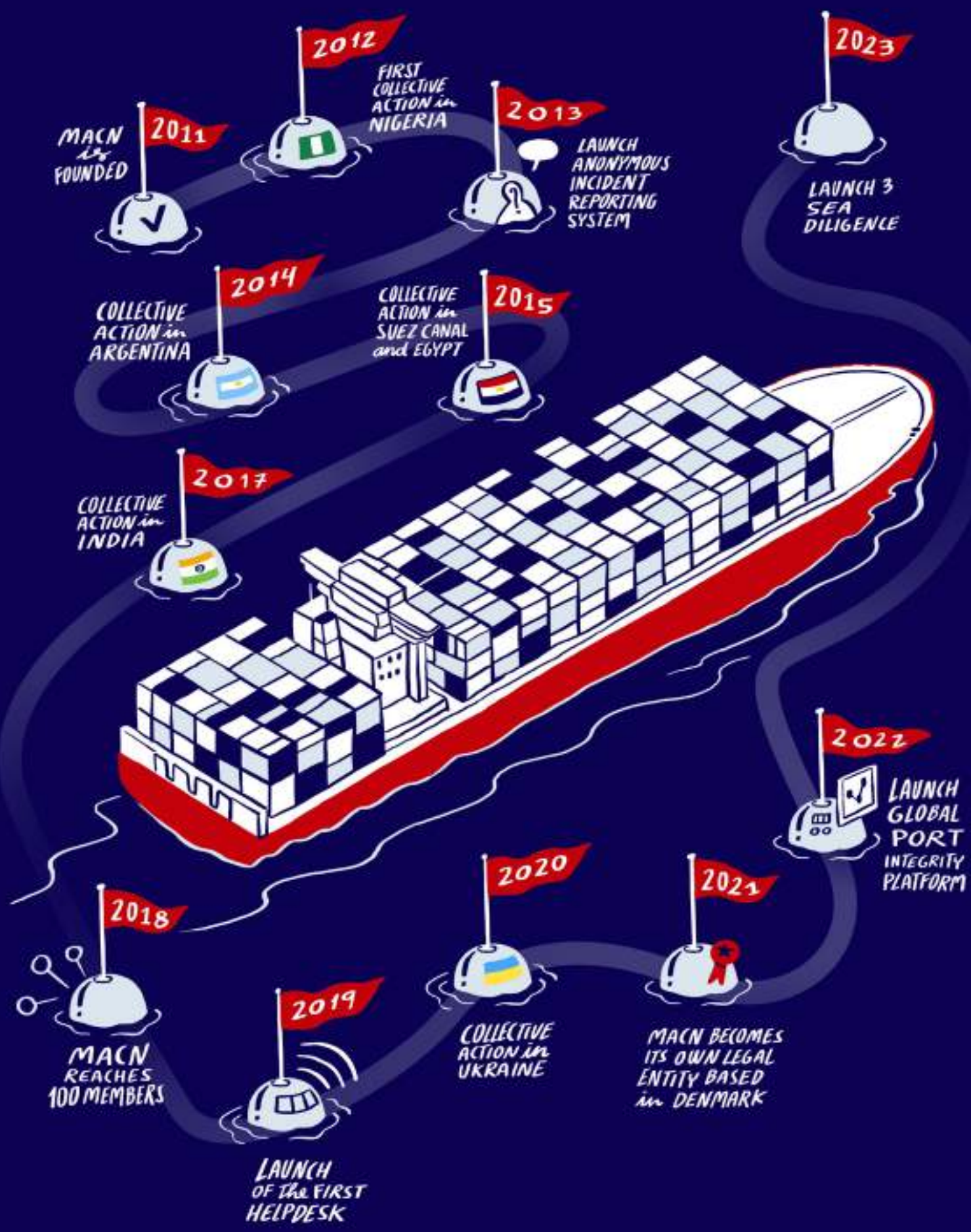
**ESG REPORTING ON ANTI-CORRUPTION**

Launch guidance document for Members

**Launch 2030 Strategy**

By 2030, we aim to expand our member base, broaden our focus on maritime trade and hinterland transport, and increase our value proposition to members, and partners.

**[Read more here](#)**



# About MACN

## VISION

The Maritime Anti-Corruption Network (MACN) is a global business network working towards the vision of a maritime industry free of corruption that enables fair trade to the benefit of society at large.

## MISSION

MACN and its members work towards the elimination of all forms of maritime corruption by: raising awareness of the challenges faced; implementing the MACN Anti-Corruption Principles and co-developing and sharing best practices; collaborating with governments, non-governmental organizations, and civil society to identify and mitigate the root causes of corruption; and creating a culture of integrity within the maritime community. This translates into the 3 MACN Pillars: Capability Building, Collective Action, and Collaboration.

## CAPABILITY BUILDING

MACN recognizes that its members and the wider industry must continuously work to strengthen their internal anti-corruption and risk management programs to be compliant with ever-tightening regulatory frameworks. Following the 7 MACN Anti-Corruption Principles, MACN develops methodologies and programs to support its members' anti-corruption compliance maturity. In 2023, MACN launched the "Compliance Journey", supporting members in the implementation of the 7 Principles.

*Read more about the Compliance Journey and other 2023 Capability Building highlights on [page 12](#).*

## COLLECTIVE ACTION

At the core of MACN's work are collective action initiatives where member companies unite with stakeholders, including port and customs authorities, NGOs, and local government, to implement a range of programs to directly address corruption risk in ports. Even if all companies have an internal defence against unethical practices, challenges will continue to exist in the operating environment if the root causes of corruption go unaddressed. Collective action is an important tool to help the private sector to take proactive steps to tackle corruption.

*Read more about MACN's 2023 Collective Action efforts on [pages 7–11](#).*

## COLLABORATION

Through partnerships, MACN advocates for regulatory changes, participates in international forums to raise awareness of maritime corruption, and contributes to better ethical standards beyond MACN's own sphere of influence.

*Read more about MACN's 2023 Collaborations on [page 14](#).*

# Collective Action

Driving and leading sustainable change in the operating environment.

## Collective Action Strategy

MACN has implemented collective action initiatives since 2012, based on the industry-led mapping of locations where the maritime industry faces many corrupt demands.

Our collective action work is dynamic, and is directed by the following factors:

- **Frequency, Severity:** Collective action initiatives are run in countries and ports where the maritime industry experiences severe and frequent integrity challenges, and where there is a willingness to address the problem.
- **Relevance:** Countries and ports must have business relevance for the maritime industry looking 3-5 years ahead from a maritime trade perspective.
- **Commercial Leverage:** Countries and ports where MACN has a critical mass of commercial leverage to support behaviour change through collective action.
- **Feasibility:** MACN assesses the opportunity to drive change in collaboration with local stakeholders, and the drivers for this institutional commitment (for example, local political commitments to the anti-corruption agenda and to trade facilitation).

MACN's in-country collective action work is assessed using the following factors:

- **Impactful:** Deliver result-focused initiatives that improve the operating environment and reduce corruption.
- **Industry lead:** Increase participation of MACN members in 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.



# Collective Action Projects



## Argentina

**Partner:** Bruchou & Funes De Rioja  
Launched in 2014

MACN and local industry stakeholders monitored the implementation of new waste management and disposal system regulations and reviewed the new Holds Inspection app developed by Senasa (Argentina's Agri-Food Sanitary Agency). Reported corruption incidents remained low, continuing a trend of steady decline. MACN has strengthened local alliances, participated in public-private roundtables, and conducted integrity training and workshops with surveyors, port agents, and local industry players.

**Read more:** [macn.dk/argentina/](https://macn.dk/argentina/)



## Bangladesh

**Partner:** Global Compact Network Bangladesh (GCNB)  
Launched in 2021

MACN has been involved in various policy interventions, including an Anti-Bribery Circular by the Mercantile Marine Office, a Court Order for Vessel Clearance, and the rules under the Cargo Protection Law. This engagement has fostered collaboration with the Government of Bangladesh, obtaining support from relevant entities within Bangladesh's maritime sector to address corruption issues. Additionally, MACN has organized seminars and industry dialogue involving key stakeholders such as the Chittagong Port Authority, Maritime University, National Maritime Institute, Bangladesh Maritime Law Society, and various Maritime Trade Associations.

**Read more:** [macn.dk/bangladesh/](https://macn.dk/bangladesh/)



## Egypt

**Partner:** Eldib Pandi  
Launched in 2015

Building our 2022 agreement, the Suez Canal Authority (SCA) and MACN advanced collaborative efforts to implement an Operational Protocol document. The Protocol aims to reinforce transparency and integrity commitments through capacity-building programs and coordinated responses to integrity challenges. Positive impacts from joint actions undertaken by the SCA and MACN are evident, as reflected in MACN Helpdesk data and feedback from Captains. The Maritime Transport Sector of Egypt (MTS) and MACN explored areas of potential collaboration to further integrity in Egyptian seaports.

**Read more:** [macn.dk/egypt/](https://macn.dk/egypt/)





## Ghana

Launched in 2023

The Ghana Maritime Authority hosted the MACN West-Central Africa Regional Conference to promote public-private sector dialogue on tackling corruption in seaports. The Conference was the first of its kind and brought together key delegations from Government and business from Nigeria, Ghana, Cameroon, Togo, Senegal, and Côte d'Ivoire. With a focus on knowledge exchange and training provided by the World Maritime University (WMU) of Sweden, attendees benefited from insights into regulatory best practices. Additionally, MACN initiated collective action efforts by collaborating with key government agencies such as the Ghana Maritime Authority (GMA), Ghana Ports and Harbour Authority (GPHA), Ghana Shippers Authority (GSA), Ghana Renew Authority (GRA), as well as Immigration and Health Authorities.

**Read more:** [macn.dk/ghana/](https://macn.dk/ghana/)



## India

**Local team:** Soumya Prakash Dalua – Project Manager;  
Deepak Shetty – Senior Advisor; Capt. Shroff – Maritime Expert  
Launched in 2015

MACN formed a public-private Steering Committee, convening quarterly with three successful meetings in 2023. Additionally, we welcomed three India-based companies as new members, and our Indian team demonstrated swift resolution of reported incidents to MACN, with a 100% resolution rate.

**Read more:** [macn.dk/india/](https://macn.dk/india/)

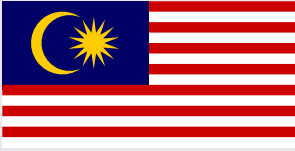


## Indonesia

Launched in 2015

MACN has re-engaged in Indonesia and has been approached by the Coordinating Ministry of Maritime and Investment Affairs (CMMIA) to initiate a dialogue on collaborative efforts to combat maritime corruption. This demonstrates buy-in from the government and lays the groundwork for further engagement in the country. Our incident data indicates that Indonesia remains a challenging environment for operating with integrity, with an increase in incidents observed last year. MACN has conducted a risk mapping exercise in coordination with our members to identify and highlight corruption challenges. Concurrently, we have engaged a broad spectrum of stakeholders in preparation for the next phase of the collective action initiative.

**Read more:** [macn.dk/indonesia/](https://macn.dk/indonesia/)



## Malaysia

Launched in 2021

MACN was invited as a key speaker at the Anti-Corruption Symposium, hosted by the Malaysian Anti-Corruption Commission (MACC) in collaboration with the Malaysian Shipowners' Association (MASA), the Ministry of Transport, and the Port Klang Authority. We conducted a comprehensive risk assessment in collaboration with members and local operators and engaged with civil society organizations as well as key industry and government stakeholders from the shipping and port sector to identify persistent corruption challenges, setting the stage for targeted interventions and reformative actions.

**Read more:** [macn.dk/malaysia/](https://macn.dk/malaysia/)



## Nigeria

**Partner:** CBI

Launched in 2012

MACN completed two funded projects (Siemens and Danida) and secured additional funding from Danida for the period 2023-2026. We launched an e-learning platform dedicated to the Nigerian Ports Process Manual for Integrity Alliance members. A total of 241 stakeholders participated in Ethics and Leadership training and Train the Trainer programs for Government compliance staff across Eastern and Western ports. Additionally, The Port User Integrity Alliance expanded to include over 273 national port users as members. Under the chairmanship of the Federal Ministry of Transportation, Marine & Blue Economy of Nigeria, a series of Compliance Roundtables were conducted to enhance evidence-driven compliance frameworks for government agencies.

**Read more:** [macn.dk/nigeria/](https://macn.dk/nigeria/)



## Pakistan

**Partner:** Global Compact Network Pakistan (GCNP)

Launched in 2021

MACN and GCNP hosted two large-scale industry events, three industry roundtables, and solidified partnerships with key industry associations and government agencies in the maritime sector of Pakistan. Over 100 company representatives and government officials received training on anti-corruption, integrity, and collective action initiatives. MACN continued its work against corruption involving fraudulent shortage claims on wet and dry cargo.

**Read more:** [macn.dk/pakistan/](https://macn.dk/pakistan/)



## Ukraine

**Partner:** ANK Law Firm  
Launched in 2019

All activities have been paused since February 2022 due to the ongoing war. We have evaluated how MACN can support Ukraine in its EU integration process, particularly focusing on aligning maritime and trade regulations and legislation. This includes the development of a Risk Assessment document by MACN, in collaboration with a local expert in the seaports and maritime sector. This document aims to identify regulatory and legislative challenges and propose best-practice solutions.

**Read more:** [macn.dk/ukraine/](https://macn.dk/ukraine/)





# Capability Building

Providing industry-leading innovative solutions to our members

MACN Launched the “Compliance Journey”, a new tool to assist members in their compliance efforts. Built around the 7 MACN Principles and MACN Tools, this journey consists of steps aimed at enhancing members’ internal processes and organization-wide strategies to tackle corruption. Aligned with critical international and national legal frameworks, the Compliance Journey serves as a robust foundation for members’ compliance initiatives.

Under the Capability Building pillar, MACN offers various methodologies and programs to its members, including:

## 3 Sea Diligence

3 Sea Diligence fosters collaboration to manage third-party risks. The platform significantly reduces the time, effort, and cost associated with conducting due diligence on third parties.

In 3 Sea Diligence, MACN members can access a range of capabilities that empower them to undertake robust anti-corruption, sanctions, and anti-financial crime compliance checks. The platform utilizes high-quality counterparty master data and capitalizes on standardized data on integrity risks in the maritime sector. The platform now hosts 7,500 supplier entities.

Read more about 3 Sea Diligence here: [3seadiligence.com](https://3seadiligence.com)



## Global Port Integrity Platform (GPIP)

GPIP provides a comprehensive assessment of integrity in ports and terminals worldwide by leveraging multiple data sources and incorporating MACN's anonymous incident data, capturing over 60,000 reported corruption incidents. With Port Integrity Risk Scorecards available for over 200 ports and terminals, GPIP provides valuable insights into port-level challenges.

By shedding light on corruption risks, GPIP allows for evidence-based conversations and empowers the maritime industry to identify and reject corrupt demands during port visits.

Read more about the Global Port Integrity Platform here: [macn.dk/macn-incident-data-and-global-port-integrity-platform-gpip/](https://macn.dk/macn-incident-data-and-global-port-integrity-platform-gpip/)



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PORTS

# Collaboration

One of MACN's Goals is to be a recognized expert working in partnership with industry bodies and regulators to raise the integrity standards in maritime trade. 2023 Collaboration Highlights include:

- MACN's CEO presented at the 2023 OECD Global Anti-Corruption and Integrity Forum in Paris on 24-25 May. The forum focused on policy solutions and business innovation, bringing together private sector representatives and experts with hands-on experience in anti-corruption collective action initiatives from an SME perspective.
- MACN's Associate Director, Martin Benderson, presented at the Anti-Corruption for Development (AC4D) Global Forum hosted by the World Bank Group as a plenary speaker in Washington on 26-27 June. The session highlighted the leadership role private sector leaders can play, and how collective action can assist in controlling corruption. This included discussions on compliance, detection, and innovation in corruption prevention.
- MACN was invited to the 8th MOU PSC workshop at the International Maritime Organization (IMO) in London where we highlighted MACN's reporting data and potential risks associated with Port State Control inspections.
- MACN CEO, Cecilia Müller Torbrand, and MACN Associate, Flora Caia, spoke at the IAPH World Ports Conference in Abu Dhabi. Their presentations highlighted the impact of MACN's collective action projects and emphasized the role of governance in enhancing efficiency and reducing corruption in ports through integrity and transparency measures.
- MACN Board Member, Øistein Jensen, from MACN's member company Od-fjell SE, represented MACN at the tenth session of the Conference of the States Parties to the United Nations Convention against Corruption (UNCAC) at the Private Sector Forum in Atlanta, USA.



# Expansion and Donor Partnerships

MACN believes that every stakeholder has a 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 initiatives.





The support from donors both encourages and further motivates businesses to engage with MACN and opens doors to governments in high-risk countries. We believe in a model of cooperation that includes international and national businesses, governments, civil society, and the private sector. Government-to-government collaboration is one of the fundamental reasons for MACN's demonstrated successes. Because of the support from international donors, we have been able to pilot innovative new on-the-ground initiatives and implement long-term integrity reforms.

To date, MACN has received funding from government and private foundation donors. Diverse funding enables us to deepen our engagement in priority areas and independently pursue our mission. We greatly value these contributions and we would like to express our sincere gratitude to our supporters. Thus far, MACN has been supported by several donors including:

- **Siemens Integrity Initiative**
- **Ministry of Foreign Affairs of Denmark**
- **Foreign, Commonwealth & Development Office**
- **United Nations Development Programme (UNDP)**
- **Danish Maritime Fund**
- **TK Foundation**
- **Lauritzen Fonden**
- **Orient's Fond**

In 2023 MACN was recognized as a knowledge partner in several donor conferences and collaboration platforms, providing and sharing our expertise and experience in collective action and multistakeholder partnership.

**The World Bank Group** invited MACN as a partner and speaker at the Anti-corruption for Development (AC4D) Global Forum in Washington, D.C. The Forum brought together more than 220 partners, leaders, and practitioners from government, private enterprise, academia, civil society, foundations, and other international development organizations working in anti-corruption and integrity.

MACN also spoke at the **Alliance for Integrity's Global Conference** on the topic of supply chain risks, integrity challenges in corporate cultures, and the need for and importance of collective actions. The conference showcased how a partnership-based approach can help meet the requirements of laws and standards on transparency along supply chains, anti-corruption, human rights, and environmental due diligence.

MACN was invited as a Partner and speaker at the **Private Sector Forum**, organized by the United Nations Office on Drugs and Crime and the United Nations Global Compact, held on the margins of the tenth session of the Conference of the States Parties to the **United Nations Convention against Corruption** (UNCAC), in Atlanta, USA. The Private Sector Forum brought together a global audience of relevant stakeholders from the business community, the public sector, civil society, academia, and international organizations with the collective aim of strengthening business integrity.





