



**SOCIETE NATIONALE DE RAFFINAGE S.A**  
**NATIONAL REFINING COMPANY LTD.**

# CODE OF ETHICS





# ETHICS POLICY

*Our ethics policy lays down a number of values which underpin our relations with our partners. These shared values are necessary for the success of our company. These values include: SAFETY; PROFESSIONALISM; EQUITY; TEAM SPIRIT; DISCIPLINE*

## OUR COMMITMENT

### RESPECT FOR REGULATIONS

#### WE COMMIT TO:

- The strict respect of the ethics policy, other existing policies, regulations and procedures applicable to SONARA.

### DEFENDING THE INTEREST OF THE COMPANY

#### WE COMMIT TO :

- Guarantee returns on our shareholders' investments;
- Promote the corporate image of SONARA at all times and show proof of loyalty ;
- Defend the interest of SONARA by insisting on the quality of goods and services ;
- Work with professionalism and confidentiality ;
- Avoid all cases of conflict of interest ;
- Turn down any gift which is likely to influence decision taking;
- Refrain from any professional activity which is incompatible with that of SONARA.

### PROFESSIONAL RELATIONS

#### WE COMMIT TO :

- Maintain professional relations based on mutual respect and courtesy;
- Maintain excellent relations through frank and open dialogue ;
- Promote team work by sharing knowledge and skills ;
- Encourage open channels of communication;
- Foster relations with our partners, based on professional ethics and the respect for our commitments with them.

### HUMAN RESOURCES

#### WE COMMIT TO :

- Guarantee the physical, physiological and psychological integrity of our collaborators ;
- Adhere to ethical principles of the code of conduct;
- Give priority to competence in the recruitment process;
- Improve professional skills without discrimination of any sort ;
- Practice equity towards all ;
- Consider merit as essential criterion for career growth;
- Promote Excellence.

**WE COMMIT TO THESE VALUES WHICH UNDERPIN OUR CORPORATE CULTURE IN ORDER TO SAFEGUARD THE SONARA PROPERTY AND GUARANTEE ITS SUSTAINABLE DEVELOPMENT**

**Done in Limbe, the 10 APRIL 2013**



## MESSAGE FROM THE GENERAL MANAGER



In SONARA, we have understood that we cannot sustainably develop without sharing a certain number of common values. These values, which constitute the basis of our Ethics policy are; Safety, Professionalism, Equity, Team Spirit and Discipline.

*Specifically, we are strongly committed to:*

- Complying with the laws and regulations in force;
- Satisfying our customers and shareholders;
- Defending the interests of the Company by demonstrating a sense of loyalty, professionalism and confidentiality in our interactions with colleagues and third parties;
- Maintaining professional relationships that foster the growth of our teams through dialogue, transparency, equity, knowledge sharing and ensuring skills transfer;
- Managing our human resources in order to promote excellence by ensuring the physical, physiological and psychological integrity of our staff.

This Code of Ethics is the pledge of our credibility towards our staff, shareholders and partners. It will help to better understand our concept of what is appropriate to do or refrain from doing as we carry out our activities. It will help each and every one of us to take the right decision before acting.

Compliance with this Code requires of each and every one of us exemplary conduct in all our dealings with SONARA and third parties. Its implementation is essential to safeguarding and boosting the reputation of SONARA as a socially responsible corporation determined to maintain its leading role in building an emerging Cameroon by the year 2035.

I call on all the staff and partners to read and appropriate the contents of this document and to be the promoters of the principles that are enshrined therein.

The Anti-Corruption and Ethics Promotion Unit (ACEPU) will accompany you whenever the need arises.

For my part, I pledge, at all times and everywhere, to support our values and to make them part of our

Corporate Culture in order to preserve our heritage and ensure its sustainability.



The General Manager



Ibrahim TALBA MALLA

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# 1. Definitions (abbreviations and acronyms)

**SONARA:** National Refining Company Ltd.

**ACEPU** Anti-Corruption and Ethics Promotion Unit

**OHADA:** Organisation for the Harmonisation of Business Law in Africa

**Integrity:** A moral value that serves as a reference and guides our choices as well as our actions. It presupposes the notion of honesty. A person of integrity is an individual whose values are reliable and stable. Integrity also means the ability of an individual to honour his commitments and principles, in spite of adverse pressures. The honest person agrees to be held responsible for his actions.

**Value:** Deeply rooted set of beliefs and practices that influence the ways of thinking, being and acting of an individual or a group of people.

**Morals:** Set of standards and rules of conduct specific to a given society. It relates to all of our obligations and answers the question “What do I have to do?” It tends to be universal and has to do with virtue.

**Corruption:** Corruption can be defined as the use of the powers conferred on a public official by his position to perform (perform, refrain from performing, have someone perform, promise to perform) acts for which he is paid.

**Proceeds of corruption:** Physical and non-physical, movable or immovable, tangible or intangible property, and any legal document or instrument evidencing a deed or interest in such property acquired as a result of an act of corruption.

**Public official:** A civil servant, employee of state corporations or public service concession holder (public, semi-public and private

company), including those selected, appointed or elected to perform the duties and services of the State at all levels of the hierarchy.

**Conflict of interest:** A situation of conflict between the mission of a public official and their private interests which could influence the way they perform their duties. In other words, conflict of interest can potentially undermine the neutrality and impartiality with which individuals should fulfil their mission because of their personal or other interests.

**Facilitation payments:** Payment to a public official to facilitate the implementation and/or acquisition of procedures and formalities or mandatory administrative documents that should normally be obtained through legal channels.

**Fraud:** Any act of or attempted deception, dissimulation, falsehood or illegal manoeuvre aimed at obtaining an unlawful advantage for an individual or group of persons.

**Ethics:** Set of principles/values/behaviours of human conduct that an individual or group makes it a point of duty to respect.

**Dilemma:** A situation where two alternative options are eminently undesirable.

**Ethical Dilemma:** A situation to choose between two alternative options which are both undesirable, in which:

- You are unsure about the appropriate course of action.
- Two or more of our values may be in conflict.
- Your decision, whatever it may be, can cause harm.

**Insider dealing:** A situation where an official or individuals having (in connection with the performance of their profession activities or duties) insider information on the prospects or a situation acts (either directly or through an intermediary) on such information to his advantage.



## **2. PREAMBLE**

The SONARA Code of Ethics is the set of rules concerning the behaviour expected of its entire staff as well as its business partners. Adherence to these rules is expressed on a daily basis by complying with the Company values and by putting them into practice. They include Safety, Professionalism, Equity, Team Spirit and Discipline.

This Code lays down the rules of conduct and principles of action which must, in all circumstances, inspire the behaviour of the staff and partners.

The primary goal of this Code of Ethics is to define the guiding principles regarding life within our Company, with a view to streamlining the behaviour of SONARA staff and partners. The specific objectives of the document are to:

- Emphasise compliance, by SONARA, with the laws, regulations and other obligations in force;
- Create a Corporate Culture around the said values that are enshrined in our Ethics Charter;
- Create an internal climate of confidence towards third parties and boost staff performance with regard to missions and shared social goals;
- Encourage whistle-blowing regarding behaviours or practices that are likely to undermine the values laid down in this Code of Ethics as a result of the mastery of whistle-blowing techniques.

The goal is to improve performance and promote the image of SONARA as well as to develop tools that contribute to stimulating ethical professional behaviour.

Every member of staff must use his common sense in applying the principles of this Code of Ethics, by referring either to the regulations in force, to his superiors or to the Anti-Corruption and Ethics Promotion Unit.

### **3. OUR VISION**

To be a leading company in Africa in refining and marketing of petroleum products

### **4. OUR MISSION**

Satisfy the needs of our clientele in the national, sub-regional and international markets through the supply of quality petroleum products (gas oil, distillate, fuel oil, heavy fuel oil, kerosene, jet fuel) and at competitive prices, produced under optimal operating conditions and in compliance with international Safety, Quality and Environment standards.

## **5. OUR VALUES**

Our values are grouped under the acronym **SPEED**.

### **SAFETY**

In SONARA, SAFETY is a priority. It concerns everybody. As a result, we are committed, individually and collectively, to comply with all the safety rules and standards and not to do anything whatsoever that is likely to endanger human life, undermine the integrity of the SONARA heritage or the environment.

### **PROFESSIONALISM**

We are committed to promoting excellence in the quality of our products and services, guarantee of a culture of continuous improvement. We strive to develop professional consciousness and the love of a job well done, in line with the objectives of the company as a whole.

### **EQUITY**

We practice non-discrimination in the selection of our partners and in inter-professional relationships within our Company. We promote transparency in the contract award and recruitment processes, in the management of our human resources as well as in the management of Company property.

### **TEAM SPIRIT**

Every SONARA worker must consider himself as part of a great team with common goals and work accordingly. Teamwork involves mutual respect. Everyone must strive to maintain a good relationship with his colleagues and defend the image of SONARA everywhere. This mutual respect also applies to customers, suppliers and partners. The principle of personal and collective responsibility must be applied by everyone.

### **DISCIPLINE**

All SONARA workers must comply with the rules and obligations that govern the Company and its activities.

## 6. OBJECTIVE OF THE CODE OF ETHICS

The objective of the SONARA Code of Ethics is to specify the behaviour expected of its management personnel, staff and partners. In this regard, it aims to:

- Facilitate the appropriation by its staff and partners of the principles of ethics;
- Provide guidance and practical information on ethical issues that may be encountered at the work place;
- Recommend solutions to be implemented in order to resolve ethical problems encountered.

## 7. SCOPE

*“It is the responsibility of every SONARA employee to work with loyalty and integrity, to understand this Code of Ethics and to refer to it regularly. The management personnel, directors and other officials have a duty to actively promote the values set forth in the Code of Ethics in the workplace by demonstrating their adherence to these principles as examples to emulate”.*

This Code of Ethics applies, without exception, to:

- All SONARA employees;
- All individuals or legal entities engaged in activities on behalf of SONARA;
- SONARA partners (customers, suppliers and others).

## 8. OUR FUNDAMENTAL PRINCIPLES

SONARA is a major company in Cameroon's economic landscape. It espouses every government policy concerning the fight against corruption. In this regard, the Company undertakes to comply with:

The fundamental principles of human rights enshrined in the Universal Declaration of Human Rights;

- The International Labour Organisation Conventions ratified by Cameroon;
- The principles of fair competition advocated by the Cameroon Public Contracts Code;
- Law No. 99/016 of 22 December 1999 on the status of public institutions, State-owned enterprises and parastatals;
- The rules promulgated as part of the OHADA law;
- Framework Law No. 2011/012 of 6 May 2011 on consumer protection in Cameroon;
- All the standards and regulations relating to its business activities in general.

### 8.1 Compliance with the law and regulations

SONARA, as a major company on the economic landscape, is built on compliance with the laws and regulations in force. The reputation of SONARA is enhanced by its adherence to reference stan-

“SONARA strictly complies with the laws and regulations governing its business activities.”

dards such as ISRS® [International Safety Rating System], ISO [International Organisation for Standardisation] 9001 and ISO 17025. Consequently, its management personnel, employees and anyone acting in its name or on its behalf, have the obligation to comply with same. To do this, everyone must acquire sufficient knowledge of the rules of law applicable to their activity.

## 8.2 Fulfilling our commitments:

### 8.2.1 Towards shareholders

SONARA is committed to respecting all its obligations towards its shareholders. In this regard, it ensures the protection, sustainability and profitability of their investments. To do so, the company regularly provides accurate and true financial statements on time. It is ready to listen to them especially through the various technical committees. It manages the assets of the company in accordance with sound management practices.

“SONARA ensures the return on investment for its shareholders.”

### 8.2.2 Towards the staff

- The Human Resource Policy recognises diversity as strength for SONARA.
- SONARA commits to implement an equitable Human Resource Policy. It recruits members of its staff based solely on its needs and on the proven competence of the applicant through a transparent process.
- It fosters the development of the competence of its staff without discrimination. Every SONARA employee holds an individual annual performance review meeting with his line manager during which targets are set, performance is evaluated and career development envisaged through appropriate training.
- It pays particular attention to their working conditions, particularly in relation to health and safety. It runs a Health Centre that meets the health standards for Companies.
- It promotes mutual respect, no discrimination and harassment in all its forms.

“SONARA ensures that the work environment is always conducive to the development of its staff, guarantee for the attainment of the Company’s profitability objective”

- It offers its staff appropriate standards of living by providing them with housing, sports and entertainment facilities.
- It involves its staff in the life to the Company by fostering the promotion of social dialogue.
- It allows its employees to exercise their right to form or join the trade unions of their choice.
- SONARA does everything possible to protect the confidentiality of the private information of its staff.
- It expects its employees to demonstrate a sense of responsibility, integrity and loyalty, while striving for continuous improvement.

### **8.2.3 *Towards the communities***

- SONARA conducts its business in a responsible manner with respect to the surrounding local communities. It takes their aspirations into consideration and participates in their socio-economic development as much as possible.
- “SONARA participates in the development of the surrounding local communities”
- It provides support in the areas of health, education and youth mentoring.

### **8.2.4 *With respect to Health, Safety, Environment and Quality***

- It seeks to ensure a safe and healthy environment for all its staff and contractors who operate in its facilities in accordance with the Health, Safety, Environment and Quality Charter.
- “SONARA has made safety one of its cardinal values”
- As a company recognised by DNV ISRS®, Level 8, ISO 9001 certified and ISO 17025 accredited, SONARA makes a strong contribution to the protection and preservation of the environment.

### **8.2.5 Towards customers**

- SONARA provides its customers with quality products and services.
- The Company constantly strives to attain customer satisfaction through the continuous improvement of its services.
- It respects and guarantees the confidentiality of the information exchanged with its customers.
- SONARA shuns corruption in all its forms in its business transactions.
- SONARA requires its customers to commit to the Ethics initiative by complying with this Code.

“Sustainably satisfy the needs and expectations of customers”

### **8.2.6 Towards suppliers and service providers**

- SONARA's relationship with its suppliers is based on the following principles:
  - ✓ Compliance with the Public Contracts Code;
  - ✓ Promotion of the principle of fair competition;
  - Preservation of mutual interests in accordance with contractual terms;
  - ✓ Respect for the principles enshrined in this Code of Ethics.
- SONARA shuns corruption in all its forms in its business transactions.
- SONARA requires of its partners to be committed to the Ethics initiative by complying with the provisions of our Code of Ethics.
- SONARA is committed to open and transparent communication with its suppliers.

“Transparency in selection and compliance with the regulations and procedures in force”



### **8.3 Commitment to communication.**

- The Communication Policy in SONARA seeks transparency and the reliability of information.
- Its purpose is to enable SONARA partners and employees to be abreast with its activities.

“Communication enhances our reputation”

### **8.4 Political Activities**

*“Political neutrality”*

- SONARA respects the choice of its employees, as citizens, to participate in the public and political life of Cameroon. However, as a parastatal company, it assumes a stance of neutrality.
- Any employee who exercises his public and political freedom outside the place and hours of work must refrain from committing SONARA in any way whatsoever.



## 9. OUR PRINCIPLES OF PERSONAL BEHAVIOUR

The sustainable development of SONARA depends largely on the loyalty, honesty and integrity of its staff. The staff must work for the general interest of SONARA. This implies compliance, at all levels, with its ethical values irrespective of the complex, difficult or risky situations with which it may be faced.

### 9.1 Compliance with the laws and regulations in force

- Every employee must avoid activities and behaviour that may be considered illegal, implicating him, or other colleagues and SONARA.
- “Knowledge of the laws governing our activities is a requirement”
- Every employee must acquire an understanding of the rules of law applicable to his activity. This knowledge enables him to operate in compliance with the rules of good practice and to judge the appropriateness of using the expert advice of hierarchy or other departments.
  - It is required of every worker to comply with legislation, standards and industry codes relating to various professions.

### 9.2 Health, Safety, Environment and Quality

- Every employee and every subcontractor is required to perform their activities in strict compliance with international standards and in-house rules on Health, Safety and the Environment adopted by SONARA.

“Every SONARA employee is responsible for Health, Safety and Environmental protection”.

- It is the duty of every employee to report any hazardous situation with which he is faced. He must also carry out preventive actions on a daily basis.
- Every employee is required to comply with the instructions regarding safety and environmental protection.
- Every employee must work daily to improve the performance level of SONARA regarding Health, Safety, Environment and Quality.

### 9.3 Relationship between colleagues

- The SONARA Human Resource Policy is the reference that guides each employee's daily activities.
- Every employee must abstain from all forms of discrimination.
- Recruitment and career management decisions are based solely on need, the ability and aptitude of the candidate to hold the position.
- Every employee is required to comply with the applicable dress code in SONARA as well as with the basic rules of conduct and those related to privacy.
- The permanent mission of each and every one is to ensure and protect the safety of others while performing their duties.

“The relationship between employees is based on trust and mutual respect”

### 9.4 Harassment

Harassment is a situation whereby an unwanted behaviour with oppressive connotations, expressed physically or otherwise, occurs with the aim of causing the victim to act against his will and undermining his dignity or freedom of expression. Harassment creates an intimidating, hostile, degrading or offensive atmosphere. It may be moral, sexual or psychological.

“Harassment is prohibited”

Harassment is manifested in the following ways:

- ✓ Preventing the victim from expressing himself and isolating him intellectually and/or physically;
  - ✓ Wilfully ignoring the victim's presence everywhere, both within the company and outside, during meetings or get-togethers;
  - ✓ Publicly criticising or discrediting the victim's work with a view to humiliating him in the presence of his colleagues or other business partners;
  - ✓ Making threatening and insulting comments verbally (directly and by telephone) or in writing;
- Harassment, in any form whatsoever, is prohibited.
  - Any employee who is the victim of any form of harassment must report it.

## 9.5 Relationship with customers and suppliers

- Every employee must act with integrity and transparency in all dealings with customers and suppliers.
- Every employee must maintain a professional and open relationship with suppliers in strict compliance with contractual undertakings and applicable laws and regulations.
- No one should profit from or derive any personal benefits from the purchase of goods or services on behalf of SONARA.

“Zero tolerance for any act of corruption with respect to customers and suppliers”

## 9.6 Gift Policy

- SONARA advocates the refusal of inappropriate or compromising gifts.
- Employees must refrain from receiving, directly or indirectly, any payment, gift, loan, entertainment, travel, accommodation,

“Gifts accepted must be of a symbolic value”

or benefit from anyone engaged in a business relationship with SONARA.

- Employees shall only accept symbolic acts of courtesy or basic hospitality, business meals or other proposals, symbolic tokens (other than monetary gifts) whose market value does not exceed 25,000 (twenty-five thousand) CFAF and if such practice is in line with the donor's customary practices.
- Everyone should ask himself if such a gift or benefit is likely to affect his work in SONARA and if the donor is likely to think that the employee's integrity has been compromised.
- The hierarchy should be informed of any solicitation or offer of specific benefits that may be made to an employee and gifts must be recorded in accordance with in-house procedures.
- SONARA gifts to its partners shall be subject to the rules set forth above.
- Every employee should communicate our policy regarding gifts to partners, customers and suppliers in his sector in order to ensure their cooperation and adherence.

## 9.7 Confidentiality

- The proper management of SONARA requires that each and everyone, regardless of their level of intervention, ensures that the information shared within the company is of good quality and accurate.
- “Sincerity, quality of information and discretion enhance our reputation”
- No employee has the right to disclose any information that he may have by virtue of the position he occupies in SONARA.
  - Employees shall not also disclose any information to other staff who are not entitled to such information.
  - The disclosure prohibition particularly covers any sensitive information which may affect the general interest of SONARA. For example, without this list being exhaustive, this prohibition covers the following sensitive information:

- ✓ performance information and financial data;
- ✓ technical know-how;
- ✓ information relating to human resource management;

An employee who is not vested with this responsibility, should not take upon himself to communicate on behalf of the company.

- This obligation to confidentiality shall subsist even after the employee shall have left SONARA.

## **9.8 Insider dealing**

- All employees, especially those in positions of responsibility may, by virtue of their positions, have insider information (not known to the public which), when used, would give them an advantage over the others.
- Therefore, the employee is forbidden from taking any decision or having such information used by intermediaries or by individuals close to him.

## **9.9 Conflict of interest**

Any employee may be faced with situations in which their personal interests or those of individuals or legal entities with whom he relates or with whom he is close

(spouses, family members, business partners) can conflict with the interests of SONARA.

“Conflict of interest impairs judgement.”

SONARA has a duty to avoid putting staff in situations of potential conflict of interest. The employee must avoid being in a situation of conflict of interest

It is the employee’s responsibility, in such a situation, to act in good conscience, given the duty of loyalty that he owes SONARA, and if in doubt, he can consult his superiors or a SONARA Ethics Coach, or the ACEPU.

The aim of the procedure is to avoid a situation whereby such a conflict may result in various consequences, prejudicial to the interests of the Company, such as taking bad decisions regarding procurement, administration of contracts, investment, recruitment, promotion, etc. In this case, the employee should not be involved in processing the file or in the decision making process relating thereto.

## **9.10 Private Entrepreneurship**

Any employee company owner, partner or shareholder in a company must comply with the laws regulating contracts and in-house procedures.

“All business dealings with SONARA must be transparent and subject to public contracts regulation”

### ***9.10.1 In case of a sole proprietorship:***

*The employee shall not:*

- ✓ engage in any activity in competition with SONARA,
- ✓ engage in any activity whose purpose is opposed to or incompatible with the interests of SONARA.

*Such a company shall not:*

- ✓ tender for the supply of goods and services to SONARA.

### ***9.10.2 In case of a Limited Liability Company (LLC) or Public Limited Company (PLC):***

*The employee shall not:*

- ✓ own units or shares in any activity in competition with SONARA,
- ✓ own units or shares in any activity whose corporate purpose is opposed to or incompatible with the interests of SONARA,
- ✓ participate in decisions that affect the supply process, from the writing of the specifications to the reception of supplies.



At the beginning of each year, the employee must inform SONARA about the companies in which he is a partner or shareholder.

### ***9.10.3 Regarding the companies of a member of the immediate family\*:***

*\*Immediate family shall be understood to refer to spouse(s) and child(ren)*

- ✓ At the beginning of each year, the employee must inform SONARA about these companies as well as any family ties.
- ✓ The employee shall not participate in decisions that affect the supply process, from the writing of the specifications to the reception of supplies.

### **9.11 Use of SONARA resources and property**

- SONARA resources and property are intended for professional use only. Every employee is committed to using same in strict compliance with the professional mission of the given resource or property.
- No SONARA financial resources or property shall be used for personal purposes or for purposes unrelated to the activities of the Company.
- SONARA facilities, equipment, financial resources, services and assets shall not be used for any personal purposes whatsoever. No employee shall appropriate, for personal use, any SONARA asset, or make it available to third parties for use to the benefit of any parties other than SONARA.
- Corporate communication and intranet systems are the property of SONARA and must be used for business purposes. Any use for personal purposes is permitted only if it remains within reasonable limits; if it is justified by the need for a balance between private life and professional life. It is forbidden to use these systems and

“Company property shall not be used abusively”

networks for illicit purposes, including the transmission and relay of messages that discredit SONARA.

- Every employee shall also refrain from making illegal copies of the software used by SONARA or from making unauthorised use of such software.
- All documents or information that fall within the intellectual, industrial or artistic property rights that belong to SONARA shall be protected.
- Given that time is an intangible resource, SONARA employees are expected to arrive at work on time and to remain there within working hours to effectively carry out SONARA work.

## **10. IMPLEMENTATION OF THE CODE OF ETHICS**

### **10.1 Popularization of the Code of Ethics**

- Each SONARA entity is responsible for the implementation of this Code, depending on the constraints and specificities of its activity.
- Compliance with and enforcement of the rules set forth in this Code of Ethics apply to all as defined in its scope.
- To this end, everyone should be vigilant with regard to what concerns them as well as those around them, within their team or with respect to persons under their responsibility.
- The values and principles of Ethics advocated herein shall be presented during the sensitisation envisaged for any new employee, subcontractor or partner.

### **10.2 Adherence to the Code of Ethics**

- Adherence to the SONARA Code of Ethics shall be evidenced by the signature, by the employee or other business partners, of the commitment sheet found on the last page of this document. Beyond a signature, this is a strong commitment on the part of the signatory.
- Every employee or business partner shall be given a copy of this Code of Ethics.
- The commitment sheet shall be signed and detached and placed in the personal file of the staff (for employees) and in the company file (for partners).
- Adherence to the Code of Ethics shall be included in the employment contracts of employees, the tender documents of companies and in contracts.
- In keeping with this commitment, all employees must read,

understand and comply with this Code of Ethics, policies and procedures of the Company.

- Any violation of the policies and procedures of SONARA shall be considered as a breach of this Code of Ethics.

### **10.3 Ethical Dilemma**

- When an employee is faced with an Ethical Dilemma, he should discuss it with his line manager, allowing sufficient time for the latter to give relevant advice or to take the appropriate decision.
- It is the duty of each line manager to help the employees under him to solve the problems that they might encounter.
- If in doubt, contact the Legal Department, an in-house Ethics Coach or the ACEPU for advice.
- No punitive action may be taken against an employee who reports an Ethical Dilemma in good faith.

## **11. Reporting system**

### **11.1 Whistle-blowing**

- Every employee must take the necessary measures to protect the image of the Company. To this end, they must be vigilant in order to detect, identify and report any situation that could compromise the values set forth in this Code of Ethics.
- The employee shall not withhold information when he is aware of any situation, individual or collective act, that might place SONARA in contradiction with the Ethical principles set forth in this Code.
- All employees must adhere to and implement the Whistle-blowing Policy.

“All acts contrary to the laws, regulations and principles of the Code of Ethics must be reported.”

## 11.2 Triggering whistle-blowing

Any stakeholder can use the internal reporting system (**PD-G-353**). Any information to be reported shall be inserted into the boxes provided for this purpose and placed in strategic corners within SONARA; The identity of the whistle-blower, where applicable, will be treated as confidential. The abusive use of the reporting system exposes its author to disciplinary action and may lead to prosecution. Conversely, the use of the system in good faith, even if the information turns out to be incorrect or does not give rise to any outcome, shall not expose the author to any disciplinary action.

### Who can report?

- ✓ The victim;
- ✓ A witness;
- ✓ A SONARA worker;
- ✓ An agent from the private sector;
- ✓ Civil society organisations (CSOs);
- ✓ Journalists;
- ✓ An ordinary citizen;
- ✓ A tourist;
- ✓ Etc.

**Note:** Whistle-blowing is a civic act that deserves reward and should not be seen as a betrayal that justifies retaliation.

## 11.3 The Entity responsible for receiving reports

Data and information are transmitted to the SONARA Anti-Corruption and Ethics Promotion Unit (ACEPU) by the whistle-blower. Members of the ACEPU are bound by a strict obligation of confidentiality.

While preserving the confidentiality of the identity of the whistle-blower, the ACEPU shall ensure that the information is recorded. When

processing information received, the ACEPU must communicate only the data and information necessary for verifying and processing the said information.

More generally, any person in charge of collecting and/or processing reported information is committed to respecting the confidentiality obligation and shall not use the data and information received for purposes other than those intended.

## **Contact:**

***Anti-Corruption and Ethics Promotion Unit (ACEPU)***

PO BOX 365, Limbe, Cameroon

Tel.: (+237) 233 33 22 38 / 233 33 22 39 - Fax: (+237) 233 33 21 88

Website: [www.sonara.cm](http://www.sonara.cm) - ***Email: cellule@sonara.cm***

## **11.4 Contents of the report**

Corruption shall be reported in a letter or standard form (which may be anonymous) addressed to the competent authority. This letter must include:

- ***Description of the act of corruption***

These are the facts as they occurred with as much detail as possible

- ***Name and/or position of the perpetrator of the act of corruption***

This is the name and/or position of the perpetrator involved in the act of wrongdoing

- ***Place where the act of corruption was perpetrated***

This information is critical because it allows the timely verification of the accuracy and veracity of the information reported

- ***Witnesses to the act of corruption***

Provide details about the individuals who witnessed the commission of the act

- ***Date and time of the act of corruption***

It is important to specify the time and date of the commission of the wrongdoing because this makes it possible to better appreciate and constitute evidence of undeniable proof

- ***Other useful information***

This is any other information which may be useful in assessing the act of corruption perpetrated.

### **11.5 Action taken following the report**

The ACEPU shall consider any information provided as allegations. After reviewing the reported information, it shall carry out appropriate investigations and decide what action to take with regard to the report

The recommendations of the ACEPU shall be forwarded to the General Manager for appreciation.

All approved recommendations shall be implemented by each party concerned and published by the ACEPU.

## **12. Evaluation, Effective Date and Review**

This Code of Ethics shall be evaluated after every 2 (two) years.

The Code of Ethics shall enter into force from the date of signature of same. It shall be updated every 4 (four) years.

LIMBE The 30/10/2014

*The General Manager*

**Ibrahim TALBA MALLA**

## EXEMPLARY EMPLOYEE GUIDE: MODEL WORKER

*The behaviour of the exemplary employee can be summarised by the acronym **ADRESSE***

ATTRIBUTE	APPLICATION & DESIRED OR EXPECTED CONDUCT
<b>A = AUTHORITY</b>	Any employee in a position of authority must exercise such authority as a good coach in order to promote the cohesion of his team. The opinion of his colleagues must be sought. However, the responsibility to make decisions remains with the hierarchy. For his part, the employee must respect hierarchy and contribute, collaborate and show proof of commitment for the advancement of work as a good team player.
<b>D = DIGNITY</b>	The dignity of a SONARA employee is marked by his love for his Company. He must take actions to foster the interests of SONARA. The dignity of the employee also hinges on his commitment to the values and principles of the Code of Ethics, which include: Safety, Professionalism, Equity, Team Spirit, Loyalty, Integrity and Honesty. The dignity of the employee manifests in the diligence with which he performs his duties on a daily basis. Such diligence is marked by the love of a job well done and according to standards. The diligent employee is disciplined and rigorous in his daily activities.



<b>R = RESPONSIBILITY</b>	A responsible employee is one who knows how to take the right decisions for the general interest. He also bears the consequences of such actions without trying to blame others.
<b>E = EXEMPLARY</b>	The exemplary conduct of a SONARA employee is manifested by the appropriation and practice of the SONARA rules of discipline on a daily basis. Exemplary conduct requires an attitude of discipline in all areas. Exemplary conduct is also reflected in the concern for work done according to the rules.
<b>S = SAGACITY</b>	Sagacity in the performance of one's work means knowing what to do, how to do it, as well as knowing what to say, at the right time.
<b>S = SOLICITUDE</b>	The SONARA employee must be available and eager to be a solution to problems. He must also comply with safety standards by protecting and preserving the integrity of lives and SONARA property.
<b>E = EQUITY</b>	The SONARA employee must treat all staff and partners without bias or discrimination.

# UNDERTAKING

To comply with the SONARA Code of Ethics

**(SONARA STAFF)**

I, the undersigned, \_\_\_\_\_

Hereby confirm that I have received a copy, read and understood the provisions of the SONARA Code of Ethics. I

Hereby undertake:

- ✓ To comply with all the provisions contained in this SONARA Code of Ethics;
- ✓ Not to encourage or participate, under any circumstances whatsoever, in any act of corruption, whether established or suspected;
- ✓ To cooperate with the Anti-Corruption and Ethics Promotion Unit as well as any Government Authority during investigations involving SONARA and in relation to corrupt practices;
- ✓ To avoid any action that might compromise me by accepting any gifts or benefits other than those authorised by the Code of Ethics;
- ✓ To immediately report any violations of this Code of Ethics to my superiors or to any other person designated by SONARA.

Limbe, \_\_\_\_\_

Employee's rank / position: \_\_\_\_\_

Signature: \_\_\_\_\_

Employee's name: \_\_\_\_\_





**PCCG**  
"CHARGEMENT DES CAMIONS-CITERNES"

**EXPORTATION**



**CONNECTING VISIONS  
WITH THE FUELING  
NEEDED**

**RAFFINAGE**



**PROTECTION DE  
L'ENVIRONNEMENT**



**Société Nationale de Raffinage**  
Raffinage de pétrole brut en produits finis

**The National Refining Company LTD**  
*Refining crude oil into finished petroleum products*



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*Fueling ambitions*

