



SET USER GUIDELINES

TABLE OF CONTENTS

A. Rationale, Purpose and Applicability..... 4

B. Process 5

C. Fees..... 10

ABBREVIATIONS

BM Business Mauritius

CIPE Center for International Private Enterprise

ICAC Independent Commission Against Corruption

IPC Integrity Pledge Committee

IPP Integrity Pledge Project

MioD Mauritius Institute of Directors

PACT Private Sector Anti-Corruption Task Force

POCA The Prevention of Corruption Act 2002

SET Self Evaluation Tool

TM Transparency Mauritius

A. RATIONALE, PURPOSE AND APPLICABILITY OF THE INTEGRITY PLEDGE PROJECT

I.1. The Integrity Pledge is a private sector-led voluntary initiative launched and developed by the MloD in partnership with the Independent Commission Against Corruption (ICAC), Business Mauritius (BM), Transparency Mauritius (TM) and other private sector partners.

The initiative stems from an agreement between the above-mentioned parties that there should be a private sector-led collective action to combat corruption¹ in Mauritius. As a result, PACT was set up, led by the MloD and Business Mauritius. The mission of Private Sector Anti-Corruption Task Force (PACT) is to promote a culture of integrity, fairness and transparency among private sector entities in Mauritius through the adoption of an Integrity Pledge and the practice of fundamental ethical principles.

PACT's first task was therefore to develop an Integrity Pledge for the private sector and define the business case for why companies should adopt the Integrity Pledge.

The Integrity Pledge Project is co-funded by the MloD and the Center for International Private Enterprise (CIPE), a US-based funding organisation that supports private enterprise and market-oriented reform. The Integrity Pledge Project was inspired from a similar initiative launched by the Institute of Directors, Thailand.

I.2. The Integrity Pledge Project is supported by a Self-Evaluation Tool (SET), which will assist Mauritian companies in assessing and measuring their ethics management and anti-corruption measures, in compliance with international best practices.

Companies who successfully pass the SET will become members of the Integrity Pledge Project and will sign the Integrity Pledge. The Integrity Pledge is a declaration of their intent, setting the ethical tone, demonstrating the directors' duty of care and giving a clear statement of the organisation's position on ethics, integrity and corruption. By signing the Integrity Pledge, companies are making a public commitment to combat corruption within the organisation.

I.3. Trust being the basis of this initiative, it is understood and agreed that while reviewing the results of the SET, the Integrity Pledge Committee (IPC) is validating a process and not the results. Hence, the IPC is not guaranteeing that a company is corruption free, rather it is validating that companies have put in place clear policies to counter the risk of acts of corruption. Therefore, neither the IPC nor the MloD accepts liability for the accuracy, completeness or fitness for purpose of the information provided by the companies in the SET.

I.4. The information contained in the SET will remain confidential and will not be distributed and/or disclosed to any third party.

I.5. The applicant is not allowed to share the incomplete/ completed SET with any third party.

B. PROCESS

This section of the document will explain the process that companies need to follow to become a member of the Integrity Pledge Project. However, making an application to join the project does not guarantee membership to the Integrity Pledge. Only companies that score a minimum of 50% will be admitted.

It is also important for applicants to understand that the Integrity Pledge does not validate that a company is corruption free. Instead, the pledge validates that companies have put in place clear policies to counter the risk of acts of corruption.

Finally, the Integrity Pledge Project is built on the premise that companies that apply for membership are doing so in good faith.

Step 1: Application

It is recommended that companies that wish to apply for the Integrity Pledge Project appoint a representative who will be responsible for leading the process and who will act as a point of contact for all matters related to the project. Ideally, this role may be fulfilled by the Ethics Officer or a member of the Ethics Committee.

Companies are allowed to apply as a group but should clearly identify the areas of operations that are covered by the SET. They should also disclose the name of all subsidiaries covered.

Applicants can fill out the application form available on the MloD's website, under the heading "Integrity Pledge". Once the application has been completed, the company's representative must send a scanned copy to the MloD by email at ipp@miod.mu. Applicants will be required to pay a non-refundable application fee as set out in the fee guide in section C of this document. The review of the application will not be completed until the application fee has been paid and the SET guidelines is signed. The application fee is non-refundable.

Step 2: Review of the application

Applications will be reviewed by the MloD within five (5) working days. The MloD will check the completeness of the application. If any essential information has been omitted, the MloD will contact the applicant to request the missing information. The missing information must be submitted within seven (7) working days. If the applicant fails to do so, it will need to make a fresh application after six (6) months.

Once the MloD has ensured that the formal criteria are met and that the application is duly filled, it will send the application to the Integrity Pledge Committee (IPC), a committee composed of a representative of the Mauritius Institute of Directors, a representative of Transparency Mauritius and a representative of Business Mauritius. The IPC is responsible for validating all applications.

Step 3: Review by the IPC

Once the IPC receives the application, it shall give its decision within five (5) working days. If the application is not approved, the MloD will send an email of decline to the applicant. In this case, applicants may only re-apply after six (6) months. The decisions made by the IPC are final and cannot be appealed. The IPC is under no obligation to give the reason(s) why the application was declined.

Step 4: Self-Evaluation Tool

Where the application has been approved by the IPC, the MloD will notify the applicant. The successful applicant will be requested to pay the process fee as set out in the fee guide in section C of this document. The process fee paid is non-refundable.

Once the MloD has received the payment of the process fee, it will send the applicant an acceptance email, as well as the Self-Evaluation Tool (SET) within five (5) working days. It is important to note that the payment of the process fee does not guarantee that the applicant will become a member of the IPP. The fees paid will cover the process costs and successful applicants have to score at least 50% to become a member of the IPP.

The SET is organised into nine (9) question banks and contains thirty six (36) indicators relating to anti-corruption processes and procedures within the applicant organisation. It is the applicant’s responsibility to fill out the whole SET, providing accurate information and where necessary, evidence, in the form of supporting documents.

Applicants will have four (4) months to complete the SET and gather supporting documents. The company representative appointed to lead the process should be responsible for submitting the SET & evidence to the MloD on a flash drive. Failure to submit the SET within the four-month deadline automatically disqualifies the applicant from the process and the latter will have to make a fresh application after six (6) months. The process fee that has been paid will not be refunded and when applying again the company will have to pay the application fee as set out in Section C of the document in order for the process to be reactivated.

Guidelines on completing the SET

Applicants need to fill out all the questions in the SET. SETs that are not duly filled or which are missing information will be automatically rejected and sent back to the applicant for completion within five (5) working days.

The applicant will be given a maximum of two (2) chances to submit the complete SET. If after the two (2) chances the company fails to submit a complete SET or if it submits the SET after (5) five working days, the SET will be automatically rejected. In this case, the applicant may submit a fresh application after one (1) year. The process fee that has been paid will not be refunded.

The SET contains nine (9) question banks, and a total of thirty six (36) indicators/questions. There are four (4) possible answers to each indicator/question: Yes, No, Not Applicable or In Progress.

Y	Yes, the company assesses that it meets the indicator
N	No, the company assesses that it does not meet the indicator
N/A	Not applicable – explanations should be provided
In Progress	Work in progress to meet the indicator

Each indicator should be answered by a check mark (✓) in the relevant column.

Guidelines for the submission of evidence

The submission of supporting documents as evidence helps illustrate the progress made by applicant companies in the different areas specified in the SET. Indicators in the SET that require supporting documents and/or explanations have been marked with a “*”.

To ensure that the supporting documents are easy to identify, it is strongly recommended that applicants create nine (9) folders (one per question bank). Each document should then be labelled according to the bank number and the indicator number, and filed in the appropriate folder.

E.g. for Bank 1, indicator 1, the document would have the following file name: 1.1, and would be placed in the folder for Bank 1. A document for Bank 2, indicator 1, on the other hand would be labelled 2.1 and would be placed in the folder for Bank 2.

Supporting documents should be submitted to the MloD on a flash drive.

Step 5: **Scoring**

SETs duly completed and submitted within the four-month timeframe will be reviewed first by the MloD within two (2) weeks and then by the Integrity Pledge Committee (IPC) within (fifteen) 15 working days. A score will be assigned to the applicant, who will be notified of the outcome within five (5) weeks.

The scoring system has three tiers:

0-49 = Unsuccessful

This score applies to organisations that have not taken enough steps to implement anti-corruption procedures. Applicants who fall in this category are therefore not eligible to sign the integrity pledge and become members of the Integrity pledge project. They will receive guidance notes from the MloD with proposed remedial actions and may resubmit a new completed SET after six (6) months. Applicants that have are unsuccessful twice will have to start over and make a fresh application after one (1) one year. The process fee that has been paid will not be refunded.

50-74 = Level 2

This score applies to applicants that have demonstrated that procedures linked to anti-corruption measures are already well-established in their organisation, and that they are taking the measures to further improve this area. Applicants in this category are automatically eligible to sign the Integrity Pledge and become members of the Integrity Pledge Project. The applicants can decide to publish their score on their website and/or annual report. The MloD will publish the name of the successful applicant on the Integrity Pledge Project webpage.

75-100 = Level 1

This score applies to applicants that are more advanced in terms of mainstreaming anti-corruption procedures across all levels of their operations. Applicants in this category are automatically eligible to sign the Integrity Pledge and become members of the Integrity Pledge Project. The applicants can decide to publish their score on their website and/or annual

report. The MloD will publish the name of the successful applicant on the Integrity Pledge Project webpage.

All decisions made by the IPP on the score of a company cannot be appealed. The IPC is under no obligation to give information on the score.

Step 6: Being part of the Integrity Pledge

Signing the Integrity Pledge is a company's commitment towards conducting business in an honest and ethical manner.

Companies falling within level 1 or level 2 will receive a confirmation email from the MloD, along with the Integrity Pledge - declaration of intent document. Applicants must sign this document and return a signed copy to the MloD.

All successful applicants will be awarded a certificate which they can display in their offices as a token of their commitment to the Integrity Pledge. They will also have the right to display the logo of the Integrity Pledge on their website and in their annual report. Their names will be disclosed on the IPP webpage.

The score of the companies will not be disclosed and it is the decision of the members of the IPP to publish their scores if they wish to.

Successful applicants must pay an annual membership fee as set out in section C of this document and will have to renew their application after (3) three years. The annual fee for the first year of membership is included in the process fee.

The renewal of the application after (3) years will be free of charge. However, the applicant will have to pay the process fee as set out in section C of this document.

In the case where a member company wants to go through the process before the three (3) years in order to review its score, it will have to make a fresh application and pay the application fees and the process fees as set out in Section C of this document.

Should a company and/or one of its officers be involved, or alleged to be involved in a fraud or corruption case in the exercise of his/her functions, and if this case is known to the public, then the IPC will request additional information from the company. The IPC reserves the right to take appropriate actions which may include suspension or removal of the company from the IPP. In making its decision, the IPC will decide on the basis of the sustainability and integrity of the IPP. The decisions made by the IPP in this regard are final and are independent from the decisions made by a court and from the outcome of any enquiry made in that regard. The decisions cannot be appealed.

C. Fees

One off application fee of Rs 3,000 (non-refundable)

Number of employees	Process fee SET	Annual fee
Small companies less than 50 employees	9,000	3,000
Medium sized companies up to 100 employees	19,000	4,500
Large companies - over 100 employees	39,000	6,000

Annual fee for first year will be included in process fee