



Guideline Manual

Combating Illicit Practices in Egyptian Ports





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1- Introduction

This Guideline has been developed as part of the Maritime Transport and Logistics Sector's commitment to strengthening integrity, transparency, and accountability across all Egyptian port operations. It reflects the State's broader efforts to support the United Nations Sustainable Development Goals, particularly those related to combating corruption and bribery in all forms.

The document provides a structured framework to guide port personnel including maritime pilots, mooring staff, port officials, and all operational stakeholders toward maintaining the highest standards of professional conduct and ethical behavior in the execution of their duties. By reinforcing these principles, Egyptian ports aim to enhance their international reputation and improve their standing in global integrity and governance indicators.

This initiative aligns with international best practices, including the International Maritime Organization (IMO) Circular FAL.5/Circ.48 on the Implementation of Measures to Combat Maritime Corruption, as well as the cooperation framework established with the Maritime Anti-Corruption Network (MACN). Such alignment ensures consistency with internationally recognized standards and reinforces Egypt's position as a reliable and transparent maritime hub.

2- Objectives

2.1 Promoting Integrity and Transparency across Egyptian Ports

This guide aims to embed a culture of integrity and transparency within the working environment of Egyptian ports by establishing clear standards of professional conduct and ensuring that all administrative and operational procedures are carried out with openness and accountability. This, in turn, strengthens trust among all stakeholders operating within and around the port community.

2.2 Supporting Personnel in Distinguishing Between Acceptable and Unacceptable Conduct

The guide seeks to raise awareness among personnel on how to differentiate between legally and professionally acceptable practices and those that may constitute corruption or bribery. This is achieved through practical examples and clear identification of "prohibited actions" in day-to-day interactions with ships, agents, and other port stakeholders.



2.3 Harmonizing Concepts and Procedures in Line with IMO Guidance

The guide is based on unifying policies and procedures across Egyptian ports in alignment with international guidance issued by the International Maritime Organization (IMO), particularly Circular FAL.5/Circ.48. This ensures consistency between national practices and globally recognized standards in combating maritime corruption.

2.4 Protecting Personnel from Unintentional Involvement in Improper Practices

The guide provides both functional and moral safeguards for personnel to prevent inadvertent involvement in practices that could be perceived as corrupt. It establishes clear rules of engagement, reporting mechanisms for undue requests or pressures, and ensures confidentiality and protection for whistleblowers.

2.5 Enhancing the International Standing of Egyptian Ports in Integrity and Anti-Corruption Indices

Through the effective implementation of this guide, the sector aims to improve the ranking of Egyptian ports in international governance and anti-corruption indicators, reflecting the State's commitment to a transparent, fair, and investment-friendly operating environment, and reinforcing Egypt's position as a global logistics hub.

3- Key Definitions

For the purposes of this Guideline, and in accordance with the provisions of the Penal Code, the Code of Criminal Procedure, and the legal framework governing professional conduct and disciplinary accountability under the Civil Service Law, the following definitions shall apply:

3.1 Bribery

Bribery refers to any offer, promise, request, or acceptance of anything of value — whether tangible or intangible — with the intent to improperly influence the performance of duties or to obtain an undue advantage not permitted by applicable laws or port regulations. This includes money, gifts, services, favors, facilitation, or any benefit provided either directly or indirectly.



3.2 Corruption

Any abuse of authority, position, or entrusted power for personal gain or the benefit of another party, resulting in harm to public interest or institutional integrity. It includes financial and administrative corruption, as well as the misuse of influence.

3.3 Conflict of Interest

A situation in which personal interests interfere, or appear to interfere, with the impartial performance of official duties or with the interests of the port or the entity to which they belong. Employees are required to disclose any personal interest, whether their own or that of their relatives, which may affect their impartiality in decision-making or the performance of their duties

3.4 Gifts and Hospitality

Any benefits, services, invitations, or privileges offered to port personnel, whether directly or indirectly, which may be perceived as an attempt to influence their decisions or behavior. The acceptance of any gifts, invitations, or hospitality from any party with an interest related to port operations is strictly prohibited, except within the limits of officially declared protocols.

3.5 Facilitation Payments

Payments or benefits intended to expedite routine procedures. Such practices are strictly prohibited under national and international regulations.

3.6 Whistleblower

Any individual who reports suspected misconduct, corruption, or violations in good faith through designated channels.

3.7 Relevant Port Stakeholders

Includes maritime pilots, mooring personnel, customs officers, immigration officials, health inspectors, ship agents, and all individuals operating within the port environment. All such parties are responsible for adhering to the principles and provisions set out in this guide



4- General Rules and Obligations

4.1 Compliance with Applicable Laws and Regulations

All personnel operating within Egyptian ports shall strictly comply with applicable national laws, executive regulations, and official instructions governing the functions of each competent authority within the port. Any violation of such legal or regulatory provisions shall constitute a formal breach and may subject the individual concerned to administrative and/or legal accountability.

4.2 Professionalism and Impartiality in the Performance of Duties

Personnel shall perform their duties with honesty, integrity, and full impartiality, without bias, favoritism, or discrimination toward any party. All port users—including shipmasters, agents, and other stakeholders shall be treated fairly, respectfully, and objectively. The use of official position to obtain personal benefit, or to benefit relatives or associates, is strictly prohibited.

4.3 Prohibition of Gifts, Benefits or Improper Advantages

No employee or worker shall solicit, accept, or receive any payments, gifts, hospitality, or other benefits from any party engaged in professional dealings with the port, whether directly or indirectly. This prohibition includes facilitation payments, preferential treatment, or any other advantages that could be construed as bribery or an attempt to improperly influence official decisions.

4.4 Identification during the Performance of Official Duties

All port personnel, particularly maritime pilots and representatives of sovereign authorities—including customs, immigration, and port health authorities—shall carry official identification and display it prominently while present on port premises or when boarding vessels. This requirement ensures transparency, accountability, and proper documentation of official interactions.

4.5 Compliance with Applicable Procedures When Interacting with Vessels

Personnel shall adhere to all applicable Egyptian laws, port regulations, and established procedures, including those related to safety, security, customs, and health controls. Individuals shall not exceed their assigned authority or interfere with the responsibilities of other competent entities. Cooperation among all relevant authorities shall be conducted in a spirit of professionalism and coordination to ensure safe and efficient port operations and navigation.



4.6 Reporting of Violations or Suspected Corruption

Personnel are required to report immediately any suspected bribery, corruption, or improper conduct observed during the course of their duties. Such reports should be made without delay and, where possible, prior to leaving the vessel or workplace. Relevant incidents should be documented using available means, including written records, electronic documentation, or witness testimony, and submitted to the designated competent authority or official port contact point responsible for handling such matters.

4.7 Maintenance of Professional Conduct

Personnel shall maintain professional and respectful conduct at all times. The use of inappropriate, offensive, or abusive language, as well as behavior inconsistent with professional standards, is strictly prohibited. Actions that may damage the reputation of the port or disrupt operational efficiency shall not be tolerated.

4.8 Confidentiality of Information

Personnel shall not disclose any confidential information related to vessels, cargo, port operations, or associated procedures except to duly authorized entities. Unauthorized disclosure, misuse, or dissemination of such information constitutes a serious violation and may result in disciplinary and/or legal action in accordance with applicable laws and regulations.

5- Reporting Mechanisms and Whistleblower Protection

5.1 Obligation to Report Violations and Corruption

Reporting any incident of bribery, corruption, or abuse of authority constitutes a professional duty for all personnel operating within Egyptian ports.

Such reporting serves to protect the integrity of the work environment, prevent misconduct that could damage the reputation of the port, disrupt operations, or undermine international confidence in the transparency and integrity of Egyptian port procedures. Personnel are strongly encouraged to report any suspicious conduct promptly upon observation, without hesitation or fear of retaliation.



5.2 Official Reporting Channels

Personnel are provided with multiple secure and confidential channels through which reports may be submitted, including:

- Direct reporting to the shift supervisor or the designated responsible authority within the port;
- Communication with the official contact point designated for this purpose, as published on the port's official website;
- All reports shall be handled with strict confidentiality and promptly referred to the competent authority for investigation and appropriate follow-up action.

5.3 Confidentiality and Protection of Whistleblowers

The Maritime Transport and Logistics Sector guarantees the full confidentiality of whistleblowers' identities and ensures that their names and personal information are not disclosed to any party not directly involved in the investigation.

Any form of retaliation, disciplinary action, or adverse employment measure against an individual who submits a report in good faith is strictly prohibited, regardless of whether the report is substantiated following investigation.

Whistleblowers shall be protected from arbitrary reassignment, salary deductions, denial of promotion, or any other form of unfavorable or discriminatory treatment resulting from their report.

5.4 Handling of Reports and Investigation Procedures

The competent authorities at each port shall review and assess all submitted reports in accordance with the principles of confidentiality, impartiality, and due process.

Where a violation is substantiated, the matter shall be referred to the relevant legal authorities to initiate appropriate disciplinary or criminal proceedings, depending on the nature and severity of the offense. Where appropriate, the whistleblower may be informed of the outcome or actions taken, in a manner that preserves confidentiality and reinforces confidence in the reporting framework.

5.5 Good Faith Reporting and Prevention of Misuse

The competent authority shall ensure the protection of individuals who submit reports in good faith and based on reasonable grounds and available evidence.

Conversely, appropriate measures shall be taken against any individual who knowingly submits false, malicious, or misleading reports, or who misuses the reporting system for personal gain or to harm others.

5.6 Promoting a Culture of Reporting and Shared Responsibility

Reporting corruption represents both a professional obligation and a national ethical responsibility shared by all stakeholders. It forms an integral part of the integrity culture that the Maritime Transport and Logistics Sector seeks to establish within Egyptian ports.

Reporting should not be viewed merely as a complaint, but rather as a constructive contribution to safeguarding public institutions, protecting national assets, and strengthening international confidence in the integrity and transparency of Egypt's maritime governance framework

6- Training and Awareness

6.1 Anti-Corruption and Anti-Bribery Training

Continuous training on anti-corruption and anti-bribery practices constitutes a fundamental component of human capacity development within Egyptian ports. All personnel—including maritime pilots, mooring staff, customs and immigration officers, and representatives of regulatory authorities—are required to attend periodic certified training programs covering the following areas:

- The definition, forms, and risks of corruption, as well as preventive measures;
- Identification of red flags that may indicate potential corruption or unethical conduct;
- Appropriate procedures for responding to bribery attempts or improper influence;
- Reporting mechanisms and protection measures in accordance with approved port procedures.

Such training ensures that personnel possess the necessary knowledge and competence to uphold integrity and comply with applicable legal and ethical standards.

6.2 Integration of Integrity Principles into Qualification and Recruitment Programs

Anti-corruption and integrity principles shall be incorporated into recruitment, induction, and professional qualification programs for newly appointed maritime pilots and port personnel. This approach ensures that personnel begin their service with a clear understanding of the ethical standards and professional values governing their responsibilities.

The level of understanding and adherence to these principles shall also form part of performance evaluation criteria and promotion considerations.

6.3 Ongoing Awareness and Reinforcement Programs

The Maritime Transport and Logistics Sector, in cooperation with port authorities, shall implement continuous awareness initiatives aimed at reinforcing integrity and ethical conduct. These initiatives include:

- The installation of awareness signage in operational areas and port facilities outlining key obligations and prohibited practices;
- Workshops, seminars, and awareness sessions conducted in cooperation with the Maritime Anti-Corruption Network (MACN);
- Display and distribution of the official joint awareness materials and integrity posters approved by the Sector and MACN within port facilities and onboard vessels.

7- Sanctions and Accountability

7.1 Principle of Accountability as a Foundation of Professional Discipline

Accountability constitutes a fundamental pillar for ensuring transparency, integrity, and effective performance within Egyptian ports. All personnel shall bear full responsibility for their actions and conduct in the course of performing their duties, whether such actions are intentional or result from negligence or failure to exercise due diligence. This responsibility shall be exercised in accordance with applicable laws, regulations, and governing administrative frameworks.

7.2 Violations Subject to Investigation and Disciplinary Action

The following actions shall be considered serious breaches of professional duty and shall be subject to investigation and appropriate disciplinary and/or legal action:

- Soliciting or accepting any financial or non-financial benefits, gifts, or advantages in exchange for performing official duties or overlooking violations;

- Abuse of authority or misuse of official position for personal gain or the benefit of others;
- Failure to report, or deliberate concealment of, incidents involving bribery, corruption, or misconduct;
- Falsification, manipulation, or unauthorized alteration of official documents or records, or the issuance of inaccurate or misleading information;
- Unjustified delay of vessels or obstruction of port services without legitimate cause;
- Engagement with unauthorized or unaccredited agents or entities;
- Unauthorized disclosure of confidential information relating to vessels, cargo, or port operations.

7.3 Disciplinary Measures

Without prejudice to the legal provisions governing professional conduct and disciplinary procedures, disciplinary measures shall be applied in proportion to the nature and severity of the violation. Such measures may include:

- Written notice or formal warning in cases involving minor behavioral violations;
- Salary deductions, withholding of incentives, or other administrative penalties in cases of repeated or impactful negligence;
- Temporary suspension from duty or referral for administrative investigation in cases involving serious misconduct or suspected financial or administrative corruption.

All disciplinary measures shall be implemented in accordance with the applicable provisions of the Civil Service Law and the human resources regulations governing the relevant authorities.

7.4 Fair Investigation and Protection of Employee Rights

The competent authorities within each port shall conduct investigations in a transparent, impartial, and fair manner, ensuring the protection of employee rights, including:

- The right of the employee to be informed of the allegations made against them;
- The right to present a full defense and provide explanations or supporting evidence;
- The principle that no disciplinary action shall be imposed unless the violation is substantiated by clear and documented evidence;
- The confidentiality of investigation proceedings until a final decision is reached.

8- Review and Continuous Improvement

8.1 This Guideline shall be regarded as a living document, subject to periodic review and continuous development to ensure alignment with evolving national and international standards in combating maritime corruption. This approach reflects the Maritime Transport and Logistics Sector's recognition that preventing corruption is an ongoing and dynamic process requiring regular assessment and enhancement of preventive and control measures within Egyptian ports.

8.2 The Maritime Transport and Logistics Sector shall oversee the implementation of this Guideline and evaluate the level of compliance across Egyptian ports. Monitoring efforts shall include, but not be limited to, the following:

- Assessing compliance indicators and performance benchmarks at each port;
- Reviewing the number and nature of reports submitted and the actions taken in response;
- Considering feedback, observations, and recommendations received from personnel and external stakeholders;
- Identifying opportunities for improvement and recommending amendments or updates, where necessary.

8.3 The Maritime Transport and Logistics Sector remains committed to strengthening cooperation with international organizations, including the International Maritime Organization (IMO), the Maritime Anti-Corruption Network (MACN), and relevant counterpart authorities in other countries.

Such cooperation facilitates the exchange of expertise, lessons learned, and best practices, supporting the adoption of internationally recognized standards and reinforcing integrity, transparency, and good governance across Egyptian ports.

9- Conclusion

The Maritime Transport and Logistics Sector hereby reaffirms its firm and ongoing commitment to promoting integrity, transparency, and accountability across all Egyptian ports. This Guideline establishes a comprehensive framework to support ethical conduct and professional responsibility at all operational and administrative levels.

It is intended to serve as an authoritative reference for personnel, ensuring that port operations are conducted in accordance with the highest standards of professionalism, impartiality, and



institutional integrity. The consistent application of its provisions contributes to strengthening operational efficiency, reinforcing public trust, and enhancing Egypt's standing within the international maritime community.

Furthermore, this Guideline reflects the State's commitment to advancing good governance principles and supporting international efforts aimed at preventing corruption and promoting transparency in maritime operations.

The effectiveness of this framework depends on the collective commitment of all personnel and stakeholders to uphold its principles. Preventing corruption is not the responsibility of a single entity, but a shared obligation requiring awareness, vigilance, and cooperation across all levels.

All personnel are therefore encouraged to demonstrate leadership in ethical conduct and to uphold the values set forth in this Guideline, thereby contributing to the continued development of Egyptian ports as modern, transparent, and internationally trusted maritime gateways.