

Code of Conduct

of the

TRANSPARENCY INTERNATIONAL Liaison Office to the European Union (TI-EU) a.i.s.b.l

This Code of Conduct for the staff of the TRANSPARENCY INTERNATIONAL Liaison Office to the European Union (TI-EU) a.i.s.b.l was approved by the TI-EU Board on 16 June 2011. It is based on the *Umbrella Statement of TI Vision, Values, and Guiding Principles* and in line with the *TI Conflict of Interest Policy*.

While the Umbrella Statement provides a firm ethical framework for our global movement, individual codes of ethics – such as this one for TI-EU – reflect the particular needs and the diversity of conditions and aspirations within our movement.

It is within this understanding that TI-EU, as one of the parts of the TI movement has developed the following Code of Conduct to guide its staff in their day-to-day work, interactions, and decision-making.

TI-EU staff and members are committed to uphold high standards of integrity and accountability, to act according to the core values and guiding principles of TI and to promote these standards and principles. TI-EU staff and members are aware that they have a special role to play in promoting the movement and its ideals to other stakeholders.

The Code is a living document. Its value to the TI-movement lies in its ability to create an enhancing environment for a culture of integrity.

Scope of the TI-S Code of Conduct

The following Practical Guidelines have been developed for TI-EU staff members (incl. Senior Advisors) regardless of their location. Those working for TI-EU as volunteers are equally bound to the TI-EU Code of Conduct as regular staff members.

General Principles of TI-EU

Our Vision

A world in which government, politics, business, civil society, and the daily lives of people are free of corruption

Our Values

Transparency, accountability, integrity, solidarity, courage, justice and democracy

Our Mission

The mission of the TI-EU Liaison Office is to advocate changes in policies and structures with the European Union towards a world free of corruption.

OUR GUIDING PRINCIPLES – Practical Guidelines

4.1. Chapter Relations

1. STAFF RELATIONS

- We will treat each other and those with whom we work with respect and consideration, being sensitive to our diversity, including in terms of cultural background, gender, religion, disability, family status, sexual orientation, etc.
- We will communicate and consult with each other openly and collegially and in a manner that assists each of us to fulfil our duties and responsibilities faithfully and efficiently.
- We will respect the privacy and private lives of our colleagues when dealing with personal information.
- We undertake to ensure adequate consultation with any staff member before making any decision, which may impact upon that staff member.

2. PERSONAL INTEGRITY

2.1 Conflicts of Interest

In our work, conflict may arise between our personal interests and the interest of TI-EU, the TI-Secretariat, National Chapters or other stakeholders. We will disclose such conflict and resolve it in a transparent manner, in the interest of Transparency International and the international movement. The following paragraph is based on the general policy set out in the TI Conflict of Interest Policy, and spells out in detail the obligations of TI-EU employees in regard to this policy.

2.2 Staff Recruitment / Non-preferential Treatment of Family and Friends

Appointments to all positions will be made on merit, regardless of gender, religion, disability, family status, sexual orientation, etc. We are committed to open, fair, and transparent appointment, recruitment, hiring, and procurement procedures and practice.

- Family members, and friends and organisations with which we or our families or friends are associated, will not be accorded preferential treatment.
- If hiring or contracting with members of the immediate families of TI-S staff or the Board of Directors, that is a partner, parent, child or sibling, we will follow carefully the guidelines set out in the recruitment policy to ensure non-preferential treatment.
- To manage potential conflicts of interest, we will disclose such connections with potential applicants or candidates of whom we are aware. We will refuse ourselves from any recruitment or contracting process where we have a conflict of interest. We will ask shortlisted candidates to declare such relations at TI-EU or with the TI-EU Board. We will not allow situations in which close family relatives or partners are in a direct reporting relationship to one another.

2.3 Anti-corruption

We require integrity and fair practices in all aspects of our activities and we expect the same standards of those with whom we have relationships.

We do not tolerate corruption and prohibit bribery in any form, whether direct or indirect. This includes facilitation payments, which are bribes and must not be made.

2.4 Gifts and Entertainment

There are a variety of customs concerning the giving and receiving of gifts in different cultures. As the acceptance of a gift may appear to create an obligation, we will avoid giving or accepting gifts, favours and gratuities in connection with official duties as required by the following policies:

- We will not accept directly or indirectly any discount, gift, entertainment¹, or favours (referred to as gifts) that may influence or be perceived to influence the exercise of our function, or the performance of our duties or our judgment.
- All gifts between the value of € 20 and € 100 will be registered as provide in the next paragraph, and all gifts from a value of € 100 or more will be refused.
- Registration Process: All gifts will be reported to the supervising officer and recorded on a document managed by the TI-EU Ethics Advisor and that is available to all TI-EU staff.

2.5 Travel and TI-EU Property

- Official travel undertaken by us will be directly related to the work of the TI-EU office, and will be undertaken only when necessary. Only economical and bona fide travel expenses will be reimbursed. Only economy airfare will be paid, unless otherwise decided by the TI-EU President in accordance with guidelines set by the Board.
- We will ensure that TI-EU resources will be used effectively. Assets under our control will be used for no purpose other than for the advancement of TI-EU's objectives.
- When private travel is added onto TI-EU related travel, we will notify our supervisor before the trip and will meet any extra costs that this may entail.

2.6 Private Activities and Private Property

- We will not engage in any activity or transactions or acquire any position or function, whether paid or unpaid, that is incompatible with or detracts from the proper performance of our duties, and that may bring TI-EU as a whole into disrepute.
- We will so arrange our private affairs as not to engage in any activity that might impair the credibility of TI-EU by giving the impression that TI-EU is fostering individuals, public or private institutions whose behaviour is perceived as not being in accordance with TI's values
- We will not use TI-EU business relationships to solicit or obtain favours or improper benefits in private life.
- We will not allow our political affiliations and/or activities to unduly influence or interfere with the political neutrality that is the hallmark of the TI-movement.

2.7 Remuneration

Where we receive any remuneration for public speaking, writing for a publication or a media appearance, and TI organisation information is involved or the appearance is a result of the individual's employment or association with TI-EU, then the remuneration will be paid directly to TI-EU. However, the TI-EU President may decide to forward such honorarium, partly or entirely, to the respective staff member.

2.8 Post-Employment

We will not allow our actions and decisions in the course of our work to be improperly influenced by the prospect of future employment with others.

2.9 Transparency and Confidentiality

¹ For example: invitations to dinner, cultural events, tourist visits, etc.

- We will be as open as possible about all decisions and actions we take, taking into account the need for confidentiality in some situations.
- We will treat information obtained in the service of TI-EU with confidentiality, when its nature calls for it or when this is explicitly requested, and will not use any such information or materials to further a private interest. This obligation continues after the staff's separation from TI-EU.

3. FINANCIAL TRANSPARENCY

- We will provide and publish audited financial statements in easily accessible form. Financial reports will be provided and published as appropriate.
- We will publish annually our sources of funding exceeding € 1,000 and account accurately and promptly to donors in accordance with the terms of their grants.

4. FINANCIAL INDEPENDENCE

We will act in line with the TI-EU Board-approved TI-EU Donations Policy and will not accept funds that might impair the independence or reputation of the organisation to pursue its mission. To this end, TI-EU will:

- accept resources only from donors who share our anti-corruption objectives;
- seek a balanced distribution between resources obtained from public sector, private sector, foundations and charities, and contributions from individuals;
- seek a multitude of donors in any aforementioned category;
- not accept resources granted under condition or structured such that TI-EU refrains from independent action, pursues activities inconsistent with its mission, or refrains from pursuing activities consistent with its mission.

5. ENVIRONMENTAL RESPONSIBILITY

We are committed to reducing the environmental impact of TI-EU, within all our operations and conduct. We will strive to integrate and apply environmental values into our decision-making processes and in our relationships with external partners and the movement.

IMPLEMENTATION:

1. GETTING FAMILIAR WITH THE CODE

- TI-EU management will actively encourage an internal dialogue on ethics, provide guidance for staff and ensure that internal systems, policies and procedures are consistent with this Code.
- Copies of the Code will be provided to each staff member and published on our website.
- The Code will be annexed to all contracts of employment and signed along with it.
- There will be an annual review of compliance with the Code and evaluation of its impact on the culture of integrity at TI-EU. The review will be conducted by the TI-EU Ethics Advisor (see II.3), together with the TI-EU Head of Office.
- Periodic meetings with all TI-EU staff members will provide a forum of discussion and review of the impact of the code.

2. RAISING AN ISSUE / WHISTLEBLOWER PROTECTION

- Any concerns about an interpretation, application or suspected violation of the Code that staff or other stakeholders are not comfortable raising directly with staff concerned should be brought to the attention of the TI-EU Ethics Advisor (see below).

If the issue cannot be resolved between the complainant and the TI-EU Ethics Advisor, then the matter may be brought to the attention of the TI-EU Head of Office. If it is felt inappropriate to raise the issue with the Ethics Advisor first, the matter may be brought directly to the attention of the TI-EU Head of Office.

- Concerns may be raised in person or email through established secure and confidential mechanisms.
- No one shall be discriminated against or disciplined or reprimanded for reporting concerns or requesting guidance concerning the TI-EU Code of Conduct whether or not the concerns are established as valid or substantiated.

3. ETHICS ADVISOR

The TI-EU Ethics Advisor is elected by TI-EU staff through an election organised by the TI-EU Head of Office, and subject to the endorsement of the TI-EU Board after consultation with the TI-EU President.

The TI-EU Ethics Advisor is elected for a period of one year, during which 10% of his/her time shall be allocated to the role, and is eligible for re-election for a maximum of two further terms which may or may not be consecutive.

The primary responsibility of the TI-EU Ethics Advisor is to inform about the TI-EU Code of Conduct and to give confidential advice on ethical questions to staff members and other stakeholders who request it. In addition, the Ethics Advisor shall in relation to this Code also:

- receive complaints in confidence where a staff member or other stakeholders have reasons to believe that a breach of the Code may have taken place, and give advice to persons concerned;
- Inform all persons concerned about any outcomes reached;
- Report where appropriate to the TI-EU President about concerns raised and outcomes reached, but without disclosing the identity of those making confidential reports;
- Maintain the registration file for gifts and make this accessible within TI-EU;
- Ensure that the impact of the Code is evaluated, when necessary;
- Collect suggestions for amendments to the Code and discuss them with all stakeholders, and
- Present an annual feedback to TI-EU staff and the TI-EU Board.

The TI-EU Ethics Advisor will not deal with cases involving personnel issues, which have no ethical implications.

4. AMENDMENTS

The Code shall be reviewed regularly. Amendments to the Code shall be discussed with all stakeholders. Final changes must be agreed by the TI-EU Head of Office and must be endorsed by the TI-EU Board.