

# **TI-S Code of Conduct**

Approved by the Board of Directors, 14 October 2002  
Revised with Board Circular #42/2003 on 6 October 2003,  
with Board Circular #15/2005 on 6 May 2005,  
with Board Circular #11/2011 on 4 March 2011

## **I. OVERVIEW**

### **1. Introduction**

This Code of Conduct for the staff of the TI-Secretariat (TI-S) 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-S - reflect the particular needs and the diversity of conditions and aspirations within our movement.

It is within this understanding that TI-S, as one of the units of the TI movement, has - through a process involving the entire staff - developed the following Code of Conduct to guide its staff in their day-to-day work, interactions, and decision making. The members of the TI Secretariat 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-S 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.

### **2. Scope of the TI-S Code of Conduct**

The Practical Guidelines for TI-S have been developed for TI-S (including both Staff as well as Senior Advisors) regardless of their location. Those working with TI as volunteers or as paid consultants are expected to observe the spirit of this Code.

### **3. General Principles of TI-S**

#### **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**

- To serve the needs of our network of National Chapters and governing bodies, working with and working through them worldwide, in accordance with the mission of TI as defined by the Board of Directors.
- To support the global anti-corruption movement by effectively addressing global and regional issues, through our advocacy work and by collecting and providing information and knowledge on corruption and good governance and through innovative products and tools that help in curbing corruption.

## **Our guiding principles**

As the staff of the international Secretariat, we are committed to respecting the following principles.

1. As coalition builders, we will work co-operatively with all individuals and groups, with for profit and not for profit corporations and organisations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest, and accountable in our relationships with everyone we work with and with each other. We endeavour to perform our duties honestly, faithfully and efficiently, respecting the rights of National Chapters and of our colleagues.
3. We will be politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified, although we ourselves do not seek to expose individual cases of corruption.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly, and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental human rights and freedoms.
9. We are committed to building, working with and working through national chapters worldwide.
10. In our operations and recruitment policies, we will strive to create equal opportunities for all, and achieve balanced and diverse representation with respect to gender and region, as the diversity of the movement we serve requires.

## **4. Practical Guidelines**

### **4.1. Chapter Relations**

- We will consult actively with our National Chapters in the development and implementation of policies and activities that have an impact on them.
- We will endeavour to respond to all requests from our National Chapters fairly and expeditiously.

### **4.2. 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; region; 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.

### **4.3. Personal Integrity**

#### **4.3.1. Conflicts of Interest**

In our work, conflict may arise between our personal interests and the interests of TI-S, 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-S employees in regard to this policy.

#### **4.3.2. Staff Recruitment / Non-preferential Treatment of Family and Friends**

Appointments to all positions will be made on merit, regardless of gender; region; 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 recuse 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-S or with the Board of Directors. We will not allow situations in which close family relatives or partners are in a direct reporting relationship to one another.

#### **4.3.3 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.

#### **4.3.4. 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, entertainment<sup>1</sup>, 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 judgement.
- All gifts between the value of € 20 and € 100 will be registered as provided in the next paragraph, and all gifts from a value of € 100 or more will be refused.

---

<sup>1</sup> *Invitations to dinner, cultural events, tourist visits, etc.*

- Registration Process: All gifts will be reported to the supervising officer and recorded on a document managed by the Ethics Advisor and that is available to all TI-S staff.

#### **4.3.5. Travel and TI Property**

- Official travel undertaken by us will be directly related to the work of the Secretariat, 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 Managing Director in accordance with guidelines set by the Board.
- We will ensure that TI resources will be used effectively. Assets under our control will be used for no purpose other than for the advancement of TI's objectives.
- When private travel is added onto TI related travel, we will notify our supervisor before the trip and will meet any extra costs that this may entail.

#### **4.3.6. 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 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-S by giving the impression that TI-S 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-S 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.

#### **4.3.7. Remuneration**

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

#### **4.3.8. 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.

#### **4.3.9. Transparency and Confidentiality**

- 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-S 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-S.

#### **4.4. 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.

#### **4.5. Financial Independence**

We will act in line with the Board-approved TI-S 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-S 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-S refrains from independent action, pursues activities inconsistent with its mission, or refrains from pursuing activities consistent with its mission.

#### **4.6 Environmental Responsibility**

We are committed to reducing the environmental impact of TI, 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.

## **II. IMPLEMENTATION**

### **1. Getting familiar with the Code**

- TI-S 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 web site.
- 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 the Secretariat. The review will be conducted by the Ethics Advisor (see II.3), together with the TI-S Ethics Council (see II.4).
- Periodic meetings with all TI-S 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 Ethics Advisor (see below). If the issue cannot be resolved between the complainant and the Ethics Advisor, then the matter may be brought to the attention of the TI-S Ethics Council. 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-S Ethics Council.
- 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-S Code of Conduct whether or not the concerns are established as valid or substantiated.

### **3. Ethics Advisor**

The Ethics Advisor is elected by TI-S staff through an election organised by the TI-S Works Council<sup>2</sup>, and subject to the endorsement of the Board of Directors after consultation with the Managing Director.

The 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 Ethics Advisor is to inform about the TI-S 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 training on ethics at the beginning of his/her term
- facilitate ethics training for staff with support from the Ethics Council, the Human Resources Department and the Governance Team,
- receive complaints in confidence where a staff member or other stakeholders have reason 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 Managing Director 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-S,
- ensure that the impact of the Code is evaluated on an annual basis,
- collect suggestions for amendments to the Code and discuss them with all stakeholders, and
- present an annual report to TI-S staff and the Board through the Board Ethics Committee.

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

### **4. TI-S Ethics Council**

The Ethics Council is composed of two members elected by TI-S staff through an election organised by the TI-S Works Council, one being at Director level and the second being at non-Director level. Members of the Ethics Council are elected for a period of two years, and are eligible for re-election for a maximum of one further term. The Ethics Council shall in relation to this Code:

- receive ethics training at the beginning of their term,
- assist the Ethics Advisor in keeping the effectiveness of the Code under review,
- assist the Ethics Advisor in facilitating training and other ethics related activities,
- maintain a dialogue and convene at least twice a year with the Ethics Advisor to review the work of the Ethics Advisor and the Ethics Council, and

---

<sup>2</sup> *The TI-S Works Council is the group of staff representatives elected by staff*

- address issues or claims raised by the Ethics Advisor, TI-S staff or other stakeholders. To this end:
  - The Ethics Advisor may request that an issue or claim be addressed by the TI-S Ethics Council. In meetings of the Ethics Council, the Ethics Advisor will not disclose the identity of any person who has made a confidential report.
  - If a staff member or other stakeholder feels it inappropriate to raise the issue with the Ethics Advisor first, or if the response from the Ethics Advisor is not considered to be satisfactory, s/he may request an issue to be addressed in a meeting of the TI-S Ethics Council.
  - If considering a specific case, the Ethics Council shall agree a third member on a case by case basis, who shall be drawn from TI-S staff or can be external to TI-S. Decisions are made by majority vote.
  - Upon such request the Ethics Council shall be convened promptly, review the issues raised and claims made and discuss these matters with the persons involved, except for persons having made an anonymous report. In such discussions, the Ethics Advisor will maintain the confidentiality of any previous discussions held on a confidential basis unless the persons involved waive confidentiality.
  - The Ethics Council shall reach a conclusion and make a written recommendation to all persons involved and, as appropriate, to the TI-S Works Council, TI-S staff, the Managing Director, the Chair of the Board of Directors and the Board of Directors.
  - If a Council member is her/himself involved in a suspected violation of the Code, s/he shall not be involved in the review of the case. A replacement will be co-opted by the remaining members, maintaining the balance between Director and non-Director level staff.

The Ethics Council will not deal with cases involving personnel issues, which have no ethical implications.

## **5. Board Ethics Committee**

Any staff member or other stakeholder who has a concern that an issue relating to the TI-S Code of Conduct has not been handled appropriately within the TI Secretariat – or where the concern goes beyond the jurisdiction of the TI-S Ethics Council - has the right of recourse to the TI Board Ethics Committee. In such cases, the recourse should follow all other measures spelt out in the terms of reference of the TI Board Ethics Committee and explicitly mention previous involvement of TI-S.

## **6. Amendments**

The Code shall be reviewed regularly. Amendments to the Code shall be discussed with all stakeholders. Final changes must be agreed between TI-S Management and the TI-S Works Council, and must be endorsed by the TI Board of Directors.