

TI-S CODE OF CONDUCT

Issued by: Chief Executive Officer
Applicable to: Executive staff, employees, interns and
volunteers, contractors and consultants
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1. FOREWORD

Following its establishment in 1993, Transparency International (TI) has been at the forefront of the fight against global corruption, bringing people together to create change. The Vision of TI is a world in which government, politics, business, civil society, and the daily lives of people are free of corruption. To be successful and credible in this mission, the entities that comprise the TI Movement are committed to upholding TI's core values and acting in accordance with TI's guiding principles throughout our administration, structures, and operations.

The TI Secretariat (TI-S) plays a key role in demonstrating and championing TI's values and guiding principles at both an institutional level, and in the day-to-day conduct of those that represent it.

Moreover, TI-S is committed to safeguarding an ethical, safe, respectful, and inclusive working environment for everyone that works with us.

This Code of Conduct (the Code) expresses the values and guiding principles of Transparency International and establishes the necessary standards of conduct that those working for TI-S are expected to uphold. The Code provides guidance for adherence to these standards in both our professional and, where necessary, private lives.

Further guidance on the appropriate interpretation and application of the Code can be obtained from the TI-S Integrity Manager (ethics@transparency.org).

Our values

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

Our guiding principles

- + As coalition builders, we will work cooperatively 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.
- + We undertake to be open, honest, and accountable in our relationships with everyone we work with and with each other.
- + We will be democratic, politically non-partisan and non-sectarian in our work.
- + We will condemn bribery and corruption vigorously and courageously wherever it has been reliably identified.
- + The positions we take will be based on sound, objective and professional analysis, and high standards of research.
- + We will only accept funding that does not compromise our ability to address issues freely, thoroughly, and objectively.
- + We will provide accurate and timely reports of our activities to our stakeholders.
- + We will respect and encourage respect for fundamental human rights and freedoms.
- + We are committed to building, working with, and working through national chapters worldwide.
- + We will strive for balanced and diverse representation on our governing bodies.
- + As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

2. SCOPE AND APPLICATION

This Code applies to anyone working for and under any form of contract or agreement with TI-S, including prospective and current employees, executive staff, interns, contractors, volunteers, and consultants (hereafter: TI-S associates). The Code is applicable regardless of the location of the aforementioned persons.

Where the practical guidelines detailed in the Code are not applicable to TI-S associates covered within its scope (i.e., internal procedural requirements that are not practically applicable to non-employees), then those TI-S associates should instead observe the spirit of the Code. TI-S must ensure that the Code is communicated to any external party covered within its scope and, where appropriate, referenced in contractual agreements.

Whilst TI-S supports its employees' right to a private life outside of their working responsibilities, it is also recognised that there are ways in which a staff member's conduct outside of work can impact the integrity and reputation of the organisation. For this reason, the requirements set out in the Code apply at all times.¹

Conduct that violates the Code, or the law, will be considered by TI-S as an 'integrity violation', and may constitute grounds for prompt disciplinary and/or remedial action. TI-S associates must therefore read and commit to abiding by the behavioural standards detailed in the Code. All members of staff to whom the code applies must sign (where indicated) to acknowledge this commitment.

For the purposes of this Code, conduct which directly or indirectly targets, or is personally suffered by or affects any person (namely, acts of discrimination, bullying and harassment, sexual harassment and sexual exploitation and abuse) shall be referred to as **interpersonal integrity violations**. All other acts that are prohibited by the Code shall be referred to as **non-interpersonal integrity violations**.

¹ The requirements shall apply to private conduct where such conduct might reasonably (1) affect any person's ability to perform their TI work responsibilities safely, effectively, efficiently, or impartially (2) negatively affect TI-

3. FUNDAMENTAL BEHAVIOURAL STANDARDS

Each of us at TI-S is responsible for maintaining an ethical, safe, respectful, and inclusive workplace environment in the way we conduct ourselves. Fundamental to this responsibility is the requirement for all employees to:

- + Uphold the integrity and reputation of Transparency International by ensuring that our professional and personal conduct is demonstrably consistent with TI's mission, vision and values.
- + Treat all people with respect and fairness, remaining mindful of diversity, and promoting inclusion in our day-to-day conduct.
- + Act positively to prevent or challenge any form of bullying, harassment, discrimination, exploitation, or abuse.
- + Perform our role responsibilities and conduct our private lives in a manner that avoids possible conflicts of interest with the work of Transparency International.
- + Perform our roles diligently and responsibly, and be honest, conscientious, appropriately transparent, and accountable in our use of information, equipment, funds and resources to which we have access.
- + Act positively to protect the health, safety, security, and welfare of others, and to minimise the environmental impact of our activities.
- + Adhere to relevant legal codes in our professional and personal conduct.
- + When necessary, actively support and protect those who experience and/or report breaches of these standards.
- + As managers, lead by example, by proactively fostering and upholding a culture of compliance to ethics and integrity.

To aid the understanding, appropriate interpretation, and practical application of these fundamental standards, the Code additionally

S's work environment, (3) contradict or undermine [TI's mission, vision or values](#), or (4) negatively affect TI's image, or otherwise bring TI into disrepute.

details further guidance and specific preventative provisions with regard to the following:

Non-Interpersonal Integrity Violations

- misuse of power and corruption
- conflicts of interest and partiality
- external activities
- gifts and entertainment
- use and protection of TI property, services and resources
- financial integrity
- health and safety
- environmental responsibility

Interpersonal Integrity Violations

- discrimination
- bullying and harassment
- sexual harassment
- sexual exploitation and abuse
- child Abuse

All those to whom this Code applies are expected to read and commit to all the behavioural standards detailed within it, and to ensure that our personal and professional conduct is in keeping with TI's [mission, vision, values and guiding principles](#).

4. REPORTING VIOLATIONS OF THE CODE

We each have a responsibility to speak up about suspected integrity violations and not to excuse or ignore unlawful, hazardous or unethical activities. By speaking up we can protect those involved from further harm as well as others who may be at risk from similar violations in the future. All employees are expected to report as soon as possible any suspected, alleged, or actual violation of the *Code* in accordance with TI-S's reporting procedures. For further information on staff reporting obligations and expectations, see the [TI-S Integrity Violations Reporting Policy](#).

5. NON-INTERPERSONAL INTEGRITY VIOLATIONS

5.1 Misuse of power and corruption

[Corruption](#) is the abuse of entrusted power for private gain and can take many forms. For the purposes of this Code, it is recognised that, through their positions, TI-S associates are entrusted by the organisation to fulfil the requirements of their roles in accordance with TI's vision, core values, guiding

principles and policy/procedural framework. Those in senior or managerial positions are entrusted to use the additional authority associated with their role responsibly, and in the best interests of the organisation and TI's mission.

TI-S does not tolerate corruption and prohibits bribery in any form, whether direct or indirect. This includes facilitation payments, which are bribes and must not be made.

TI-S and its staff are committed to preventing misuse of power and corruption in the organisation and to that end make the commitments indicated below.

- + I will not abuse any real or perceived power that accrues from my position in TI.
- + I will not support or take part in any form of corruption.
- + I will not pay, solicit, offer, or accept any form of bribe (monetary or non-monetary), whether directly or indirectly.

5.2 Conflicts of Interest & Partiality

A *conflict of interest* arises when a TI-S associate has a personal associate, family, or business relationship, or is involved in any activity, interest, or association, within or outside of TI, that could impair (or give the appearance of impairing) their ability or willingness to act impartially, or to properly fulfil the requirements of their position in the best interests of TI.

Partiality is the deliberate misuse of a position and influence to serve a private interest (including that of an affiliated party). Safeguarding the organisation against partiality, as well as perceptions of unresolved conflicts of interest and partiality, is the responsibility of all TI-S associates.

TI-S and its staff are committed to preventing partiality in the organisation and to that end make the commitments indicated below.

- + I will not seek preferential treatment for any relatives or business/close personal associates and organisations with which I, my relatives, or business/close personal associates are associated.
- + I will promptly disclose to my manager and the Integrity Manager situations where a conflict of interest exists, or may reasonably be perceived as existing, including situations in which I am in

a direct reporting relationship with a relative or close personal associate.

- + I will promptly disclose to my manager, Integrity Manager, HR, or the relevant recruiting manager (in the case of prospective employees) any information about my professional history (including political campaigning and advocacy) that is, or might be perceived to be, in conflict with the mission, vision and values of TI.
- + I will not use TI business relationships to solicit or obtain improper favours or benefits in my private life.
- + I will recuse myself from participating in any activity where an actual or perceived conflict of interest may impair or be perceived as impairing my professional judgement or ability to properly fulfil my role responsibilities.
- + If in rare circumstances, having declared my conflict, I cannot be recused from such a situation,² I will work with my manager and/or the Integrity Manager to ensure that sufficient measures are put in place to prevent partiality or the semblance thereof.

5.3 External activities

TI-S is supportive of employees that choose to become involved in activities outside of their work. Examples of 'external activities' relevant to the *Code* would include external business interests, political activities, direct involvement in campaigns and activism, membership of a trustee board, involvement in publications, etc. TI-S recognises that staff often use their personal platforms to promote actions, activities and campaigns. However, some external activities may give rise to a conflict of interest, particularly those which: are incompatible with TI-S's [mission, values and principles](#); negatively impact a staff member's ability or capacity to fulfil their role responsibilities; use an association with TI-S, or make unauthorised use of its name, funds, private data or resources; are conducted as part of a TI-S activity but attract additional private remuneration; are improperly influenced by the prospect of future employment opportunities with

² Declared conflicts shall be assessed by the relevant manager in consultation with the Integrity Manager, who shall be responsible for agreeing whether, in the circumstances, recusal from a process is a feasible and appropriate action.

³ Activities intended to report integrity violations by, or within, TI-S (in accordance with the Integrity Violation

others or; otherwise create a situation in which a TI-S associate's private interests might compromise the integrity of their position, or their ability to act impartially.

TI-S and its staff are committed to safeguarding the integrity and reputation of the organisation and to that end make the commitments indicated below.

- + I will not allow actions and decisions made in the course of my work to be improperly influenced by the prospect of future employment with others.
- + I will not allow my political, financial, or other affiliations, activities, or ambitions to unduly influence or interfere with the principles of political non-partisanship and religious neutrality of TI.
- + I will not seek supplementary payment for activities connected to my work in TI-S, such as public speaking, publications, or media appearances. Should I receive any remuneration for such types of activities, then the remuneration will be paid to TI.
- + I will ensure that my personal conduct and external activities (whether paid or unpaid) do not detract from the proper performance of my duties, and are consistent with the mission, values and principles of TI, and do not bring the reputation or image of TI into disrepute.³
- + In the event that I leave TI-S for future employment in an institution which I have previously sought to influence on behalf of TI, I will avoid any real or perceived conflicts of interest and self-impose a 'cooling-off period',⁴ before taking up that position, where appropriate.

5.4 Gifts and Entertainment

TI-S associates should not accept personal gifts from or offer personal gifts to organisations or individuals with whom they have, or might have, dealings on behalf of TI. This can include entertainment (outside the scope of normal

Reporting Policy) shall not be considered as bringing the reputation or image of TI into disrepute.

⁴ Reasonable minimum cooling-off periods of 12-18 months are recommended to mitigate the risk of conflicts of interest. See also TI's [Code of Ethical Advocacy](#).

business hospitality), or goods and services in kind or at preferential rates. It is however recognised that, in some contexts, it might be culturally insensitive/offensive to decline or refuse to accept a gift that is offered. In these circumstances employees may opt to accept a small gift of a token value (not exceeding €100, reasonably estimated) that is offered to them. Any such gift accepted by an employee must be within the limits of reasonable judgement, in consideration of the value and appropriateness of the gift, and the circumstances in which it was offered (in particular consideration of the Code requirements regarding corruption and partiality, discussed above). All gifts of a reasonably estimated value exceeding €20 should be declared, in writing, to a line manager, recorded in the Gift Register and passed on to TI-S, where appropriate. Monetary gifts (such as cash, bank transfers, vouchers, discounts, or tokens) must not be accepted in any circumstances. TI-S associates can accept normal business hospitality (e.g., refreshments and accommodation) on a reasonable scale when representing TI and its interests in an official capacity, in accordance with the provisions and standards of the Code.

TI-S and its staff are committed to preserving its independence and preventing any undue outside influence of the organisation and its staff, and to that end make the following commitments.

- + I may only give and accept small gifts of a token value, openly and on behalf of TI, provided that these do not compromise the integrity (or could be perceived to compromise the integrity) of my role, or the organisation.
- + I will report to my manager any gift exceeding an estimated value of €20 that I have accepted or given and record it in the Gift Register managed by the Integrity Manager, available to all TI-S staff.
- + Under no circumstances will I accept a gift that may reasonably influence or be perceived as influencing the exercise of my function, the performance of my duties or my judgement, as well as monetary gifts or gifts of estimated value exceeding €100.
- + If I am a manager, I will not solicit gifts, favours, or loans from staff members, and I will not accept any unsolicited gifts that are of more than a token value.
- + I will not use TI business relationships to solicit or obtain favours or improper benefits in my private life.

5.5 Use and Protection of TI-S Property, Services and Resources

TI-S's property (including assets and resources), private or confidential data and information, equipment, employment benefits, time and information to which staff have access by virtue of employment at TI-S, must not be used for purposes other than the advancement of TI's objectives. They must be used responsibly.

TI places a high value on transparency in the disclosure of information (see also TI's [Public Disclosure Policy](#) and [Code of Ethical Advocacy](#)), rules, plans, processes and actions, believing that there is a duty to act visibly, predictably, and understandably to promote participation and accountability and allow third parties to easily perceive what actions are being performed. Equally, TI-S respects the individual right to privacy and is committed to safeguarding sensitive information from abuse or compromise in compliance with the law.

- + I will safeguard the TI-S equipment that I receive or have access to in the course of my employment at TI-S and ensure that each item is used effectively for the purpose for which it was intended. I will take reasonable precautions to protect such equipment from loss or damage.
- + I will not use TI-S computers, equipment or IT access for external business purposes or for illegal, offensive, or unethical activities.
- + I will promptly report the loss or damage of any TI-S property for which I am responsible to my manager and/or a relevant department manager (e.g., Office Management, I.T, etc.)
- + While seeking to be as transparent as possible about my decisions and actions, I will take into due account the need for confidentiality in some situations, including the protection of private and confidential data.
- + I will treat with confidentiality the information obtained in the service of TI, as well as any work that I produce as a TI-S associate, when required by the nature of the work or when this is explicitly requested. I will not use any such information or materials to further a private interest, including after the end of employment with TI-S.
- + I will respect the privacy of other TI staff. If my work requires handling the personal data of

others, I will act in accordance with applicable laws and contractual obligations.

- + I will register and report advocacy efforts through relevant national, supranational, and regional registers, regardless of whether the registration is mandatory or voluntary. I will provide each requested piece of information to the best of my knowledge.
- + In the private use of social media in which I may be reasonably identified as a TI-S associate (or otherwise representative of the organisation), I will clarify that I am voicing my personal opinions as opposed to the views of the organisation.
- + When communicating on matters that are related to my work, or the work of TI, I will ensure that the information that I share is factually correct and that it is not in breach of any confidentiality requirements.

5.6 Financial Integrity

We are accountable to our donors, partners, and the beneficiaries of our work for the management of our financial resources. Financial integrity violations can have a significant impact in the work and reputation of the organisation. Financial integrity violations that are prohibited under the *Code* include deliberate dishonest acts, such as fraud and theft, as well as negligent or reckless waste, or gross mismanagement.

- + I will not engage in any act of fraud or theft.
- + I will not deliberately waste or misuse funds.
- + I will not use funds I am not authorised to use.
- + I will not act recklessly or be negligent in my use of funds or resources.
- + I will comply with relevant contractual and policy obligations relevant to my use of funds and resources.
- + Where I feel that I am unable to diligently manage funds that I am responsible for, I will seek advice from management immediately.

Our commitment to due diligence and accurate transaction processing and reporting to all our stakeholders reflects on the reputation and credibility of the organisation and the Movement and is fundamental to TI fulfilling its mission and obligations.

- I will not engage in the falsification (or other deliberate misrepresentation, including the omission or concealment of relevant information) of any financial record for which I am responsible, including financial accounts, quality reports, time records, expense reports, benefits claim forms, etc.
- I will not engage in the falsification of documents or distort the true nature of any transaction.

5.7 Health and Safety

TI-S is committed to providing a healthy and safe working environment for all employees, in accordance with applicable health and safety regulations. All staff must behave responsibly and with due regard to the security, health and safety of themselves and others in the workplace and when engaged in work-related activities and travel.

- + I will behave in such a manner so as to avoid any unnecessary personal risks that may impact on the security, health, safety and welfare of myself and others. I will not be negligent or reckless in this regard.
- + I will not commit any act, or consent to any act being committed, that could cause physical or significant psychological harm or suffering to any person.
- + When travelling, I will act responsibly, complying with the relevant safety and security guidelines and requirements.

5.8 Environmental Responsibility

TI-S recognises that environmental responsibility is associated to the fight against corruption and the protection of environment defenders and whistleblowers. To this end, [TI-S's Environmental Policy Statement](#) details the commitment and specific measures implemented by the organisation to minimise the environmental impact of our activities. The policy provides a number of behavioural requirements, considerations and procedural guidance that must be applied by all employees in the workplace and when engaged in work-related activities and travel.

As one of the largest sources of greenhouse gas emissions is travel, it is particularly important that all staff adhere to the 'key principles for helping to reduce emissions' as detailed in the [Sustainable](#)

[Travel Manual](#) to reduce travel emissions as much as possible.

- + I will conduct myself in an environmentally responsible manner, taking into due account the environmental impact and sustainability of my actions and activities, in accordance with the Environmental Policy Statement and Sustainable Travel Manual. I will not be reckless or negligent in this regard.
- + I will integrate the due consideration of environmental concerns and impacts into my decision making, planning and execution of my role responsibilities.
- + I will only travel for work when it is necessary to do so, and no suitable and appropriate alternatives are available, and in accordance with the 'key principles for helping reduce travel emissions' detailed in the Sustainable Travel Manual.

6. INTERPERSONAL INTEGRITY VIOLATIONS

Interpersonal integrity violations are harmful forms of behaviour that can damage or compromise the physical and psychological wellbeing of others and are therefore prohibited. We all have a role to play in fostering a safe and inclusive working culture and maintaining an environment that prevents interpersonal integrity violations at TI.

Whilst interpersonal integrity violations might occur between staff (or external parties) at any level of the organisation (including between peers), TI-S recognises that such violations may often involve the abuse of a position of actual or implied power or influence. Differentials in power dynamics (e.g., through role seniority, age, contract/employment status, immigration status, physical strength, perceived popularity, etc.) should therefore be considered in the application of this *Code*. For the purposes of this Code, rules of behaviour are broadly formulated to prevent interpersonal integrity violations from occurring. Specific preventive measures for groups at higher risk will be described in the relevant preventive policies for each violation.

TI-S staff members should take action if they witness, or are aware of, interpersonal integrity

violations, where possible after consulting the affected person.⁵

Where safe and appropriate to do so, required action might include offering or providing support to those impacted by the violations (or associated risks); intervening or challenging inappropriate conduct directly, or; offering/providing support or guidance to an affected person during their reporting of the issue. If appropriate, staff are strongly encouraged to report such violations in accordance with the procedures established in the Integrity Violation Reporting Policy. If in doubt, staff should discuss the issue with their manager, the Integrity Manager, or others as detailed in the Integrity Violation Reporting Policy. Suspected or alleged incidents of child abuse *must* be reported in all cases.

Whilst reporting is encouraged from those that have been subjected to, or personally affected by, interpersonal integrity violations (Affected Persons), Affected Persons are under no explicit or implied obligation to report violations directed towards, or suffered or experienced by them.

6.1 Discrimination

TI-S is committed to creating a safe and inclusive working culture in which its mission is realised through the experience, skills and abilities of our diverse workforce. This working culture must be embedded across all levels of the organisation. All TI-S associates share the responsibility for implementing this commitment by treating each other with respect and fairness, remaining mindful of cultural differences, and by promoting inclusion in their day-to-day conduct.

Direct discrimination occurs when a person is, has been, or will be treated unjustly, prejudicially, or deprived of access to or excluded from rights, based on factors of (perceived) race or ethnic origin, nationality, skin colour, gender, gender identity/expression, language, marital status, family status, social status, religion, or belief (or lack thereof), disability, age, or sexual orientation.

Indirect discrimination occurs when an apparently neutral provision, criterion or working practice causes a person to be disadvantaged on the grounds of their (perceived) race or ethnic origin, nationality, skin colour, gender, gender identity/expression, language, marital status, family

⁵ In relation to interpersonal integrity violations, violations might be directed towards, or suffered or experienced by,

specific individuals. For the purposes of this *Code*, these are referred to as **Affected Persons**.

status, social status, religion, or belief (or lack thereof), disability, age, or sexual orientation; or creates or implies an instruction to discriminate against a person on any of these grounds.

These definitions would not apply to circumstances in which a discriminatory action is in fulfilment of a legitimate aim and is an appropriate and necessary means to achieve that aim. This might include, for example, ensuring an appropriate gender balance for a role specifically requiring mixed gender representation.

- + I will show respect to and act in a professional manner towards all the persons with whom I work. I will ensure that my conduct is enabling of a safe and inclusive working culture.
- + I will not discriminate directly or indirectly on the grounds of nationality, skin colour, gender, gender identity/expression, language, marital status, family status, social status, religion, or belief (or lack thereof), disability, age, or sexual orientation.

6.2 Bullying and Harassment

TI-S is committed to implementing a culture in which bullying and harassing behaviour is not committed, tolerated, or endorsed by anyone that represents the organisation. Where such behaviour is identified, TI-S will act swiftly to address it.

Bullying and harassment is defined as unwelcome, improper, or harassing behaviour with the purpose or effect of humiliating or violating the dignity of the person concerned and/or of creating an intimidating, hostile, degrading, humiliating or offensive environment. It may be based on discriminatory grounds (as summarised above) and is often experienced as the cumulative effect of a series of incidents or systematic targeted mistreatment (potentially involving multiple complicit perpetrators acting individually), but also might be limited to an isolated event. This can include (but is not limited to) the expression of inappropriate and offensive jokes, veiled or explicit threats, slurs, epithets or name-calling, intimidation, insults or put-downs, ostracism, harassing photography or recording, or the spreading of malicious rumours or criticisms.

⁶ Activity will be deemed as sexual if it could reasonably be considered that: (a) it is sexual by its very nature (e.g., conducted as part of, or in relation to, a sexual act), or; (b) the circumstances in which the act was committed, or the

Disagreement on work performance or on other work-related issues is normally not considered bullying or harassment and is not dealt with under the provisions of the Code.

- + I will not engage in any form of bullying and harassment.
- + When safe and appropriate, I will challenge and take action to prevent bullying and harassing conduct by others.
- + I will treat my colleagues and those with whom we work with respect and consideration, being sensitive to our diversity (i.e., race or ethnic origin, nationality, skin colour, gender, gender identity/expression, language, marital status, family status, social status, religion, or belief (or lack thereof), disability, age, or sexual orientation).
- + I will communicate and consult with my colleagues and those with whom we work openly and collegially, in a manner that is suited to a professional working environment and assists each of us to fulfil our duties and responsibilities faithfully and efficiently.

6.3 Sexual Harassment

Sexual⁶ harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, or when such conduct interferes with work, or creates an intimidating, hostile or offensive work environment. Sexual harassment may occur in the workplace or in connection with work. Sexual harassment usually involves a pattern of behaviour, although it can also refer to one incident. It includes a range of physical, verbal, and non-verbal conduct of a sexual nature such as sexual jokes, sexual comments, displaying sexual pictures and images and gestures in the workplace or in connection with work.

intention or interpretation of any person in relation to it, are such that it would reasonably (within the relevant context) be considered as sexual.

- + I will not sexually harass anybody.
- + I will maintain a work environment free from sexual harassment by avoiding verbal, visual or physical conduct of a sexual nature that may reasonably create an intimidating, hostile or offensive work environment, or cause someone to feel sexually harassed.
- + Where safe and appropriate to do so, I will challenge and take action to prevent sexually harassing behaviour and will report violations of this code in accordance with the TI-S Integrity Violation Reporting policy.

6.4 Sexual Exploitation and Abuse

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, pursuit of personal sexual gratification and profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse includes sexual assault, sexual violence and all sexual activities with children under 18 years old. It does not include sexual relations between adults (over 18 years old) that are freely consented to.

- + I will not interact sexually with anybody without the other's willing consent.
- + I will not solicit or take part in any sexual interaction with children (persons under the age of 18), regardless of local laws and customs regarding age of majority and/or consent. I understand that mistaking the age of a child will not be accepted as a defence or mitigation.
- + I will not have any sexual interaction with fellow employees or others whom I encounter as a result of my employment in exchange for money, goods or favours, or based on any form of coercion or implied or actual abuse of power.
- + I will not sexually exploit anyone.

6.5 Child Abuse

Child⁷ abuse or maltreatment consists of all forms of physical and/or emotional ill-treatment, sexual abuse, neglect, or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to a child's health, survival, development, or dignity in the context of a relationship of responsibility, trust, or power. TI-S does not tolerate or accept any form of child abuse.

TI-S expects all staff to comply with all relevant legislation, including labour laws in relation to child labour and to immediately report concerns or allegations of child abuse in accordance with the TI-S Integrity Violations Reporting Policy (this is a legal obligation).

- + I will not engage in any form of child abuse.
- + If, through my TI-S employment, I am required to have contact with, or work directly with children, I will abide by the requirements of the Child Protection Policy.
- + I will immediately report any suspected or alleged incidents of child abuse or non-compliance with the Child Protection Policy through one of the designated channels of the Integrity Violation Reporting Policy.

⁷ For the purpose of this Code and the [Child Protection Policy](#), the definition of a child is "every human being

below the age of 18" as recognised by the United Nations Convention on the Rights of a Child.

7. COMPLIANCE WITH THE CODE OF CONDUCT

All TI-S employees (including executive staff) are required to read, sign and adhere to the Code of Conduct.

Adherence to the Code of Conduct means following the rules of behaviour defined within it. TI-S requires adherence to the Code as well as to relevant domestic legal codes in the country in which TI-S associates are working and/or based. Where such legal codes are more stringent than the requirements of this Code, the relevant standards of conduct and employer obligations required by law should be applied.

Management at all levels must ensure that all TI-S staff know and understand their responsibilities under this Code and create an environment where persons who are subjected to, suspect, or witness misconduct feel safe and empowered to report, without fear of suffering unfair treatment or other repercussions.

Further information on how and when to report suspected violations of this Code is available in the Integrity Violations Reporting Policy. The policy details both the confidential internal and external options for reporting a violation, the protections and support available for those that choose to report and the circumstances in which reporting a violation shall be considered mandatory. Guidance can also be sought from the Integrity Manager.

Where substantiated, violations of the Code, TI policies or applicable law may be cause for disciplinary action, up to and including summary termination of employment. Where laws have been violated, TI-S will cooperate fully with the appropriate authorities. A summary of the response process that shall be applied in the event of a reported (or otherwise identified) violation, including the determination of disciplinary actions, is available in the Integrity Violation Reporting Policy.

8. TRAINING AND FURTHER INFORMATION

The Integrity Manager (IM) is responsible for the provision of training on the Code of Conduct to all staff, at least once per annum. The IM shall further ensure that all new starters receive training on the Code of Conduct as part of their induction programme.

Questions, queries, or concerns regarding the Code of Conduct and its practical application can be raised directly with the IM.

9. REVIEW

This Code shall be reviewed every three years. The review process will be led by the Integrity Manager, in consultation with relevant stakeholders in TI.

Furthermore, the Code shall be reviewed whenever necessary due to legal changes.

10. RELATED PREVENTATIVE POLICIES

- [Conflict of Interest Policy](#)
- [Code of Ethical Advocacy](#)
- [Data Protection Statement](#)
- [Public Information Disclosure Policy](#)
- [Sustainable Travel Policy](#)
- [Sustainable Travel Manual](#)
- [Prevention of Sexual Exploitation, Abuse and Harassment \(PSEAH\) Policy](#)
- [Child Protection Policy](#)
- [Grievance Policy](#)
- [Gender and Diversity Policy](#)
- [Anti-Harassment Policy for TI-S organized events](#)
- [Environmental Policy Statement](#)
- [Drug Free Workplace Policy](#)
- [Petty Cash Financial Guidelines](#)
- [Purchase and Procurement Policy](#)
- [Anti-Fraud Policy](#)
- [TI-S Integrity System – Strategic Framework](#)
- [TI-S Integrity Violation Reporting Policy](#)

11. DECLARATION

I commit that my personal and professional conduct shall be in accordance with the requirements of this Code, and that I will undertake my duties in a way that is consistent with the [Mission, Vision, Values and Guiding Principles](#) of Transparency International.

Name: _____

Signature: _____

Date: _____

