

Basel Institute on Governance Code of Ethics

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1 Purpose

As a not-for-profit Swiss foundation, headquartered in Basel, Switzerland, with operations worldwide, the Basel Institute on Governance (hereinafter Basel Institute) is dedicated to combating and countering corruption and improving standards of governance around the world with a view to contributing to a more equal, prosperous and peaceful world. In pursuing its mission to counter corruption and financial crimes and improve the quality of governance worldwide, the Basel Institute works with public and private bodies, international organisations and other not-for-profit and non-governmental entities in Switzerland and around the world.

The Basel Institute is committed to the highest standards of ethical conduct in all its dealings and activities, and this Code of Ethics sets out the core principles that inform those standards.

2 Scope

This Code is applicable to all Basel Institute Board members and to all Basel Institute personnel, wherever they are located, including at headquarters in Basel, in any of the Basel Institute's offices and operations outside of Switzerland, and its subsidiary in Peru; together they are referred to in this Code as "we", "Basel Institute" or "Basel Institute personnel."

This Code is also applicable to anyone else acting on behalf of the Basel Institute, including in particular but necessarily limited to short-term consultants and other third -party intermediaries.

As part of their onboarding/induction process, all Basel Institute personnel are made aware of and are obliged to familiarise and regularly re-familiarise themselves with this Code and any other code or policy of the Basel Institute directly related to this Code.

3 Values and guiding principles

We adhere to the values of integrity, accountability and transparency in our work and behaviour, wherever we work in the world, and in all our relationships: Internally, in the field and on mission, within our team as well and with regard to all partners and other third parties. We respect, and encourage respect for, human rights and the principles of diversity, solidarity and equal opportunity. We pursue our activities in accordance with applicable laws and relevant international standards and good practices.

As an independent institution, we are non-partisan and non-sectarian in the conduct of our affairs and in the products we deliver. We consistently carry out our work with professionalism, applying the highest standards of academic research and analysis, and observing confidentiality where requested.

4 Our standards

4.1 Recruitment

We are committed to open, fair and transparent hiring processes and practices for all staff. We ensure that these are based on objective criteria and merit regardless of age, gender, religion, disability, marital status, sexual orientation or any other difference.

4.2 Employment

We are committed to ensuring that our staff can work under fair employment conditions, which include adequate remuneration and benefits, equal professional development opportunities, and an appropriate workplace environment based on mutual respect and courtesy.

4.3 Financial transparency

We ensure financial transparency and disclosure of our activities. We apply best standards according to Swiss law to our accounting, audit and other financial practices.

4.4 Abuse of authority

We do not misuse authority entrusted to us for any sort of personal or professional gain.

4.5 Safeguarding, fairness, diversity and respect

We operate in many jurisdictions around the world and are fortunate to have a diverse workforce that we value highly and count as one of our key assets. We strive to create an environment of trust in which personal dignity, privacy, well-being and the personal rights and safety of every individual is safeguarded. We believe we have a responsibility to treat each other, and everyone we interact with, with dignity and respect. This also means appreciating diversity, whether that diversity exists because of race, religion, gender, sexual orientation or any other difference.

In line with these core values and principles, we do not tolerate any forms of bullying, harassment, discrimination, exploitation, abusive behaviour or intimidation, including sexual exploitation, abuse and harassment (SEAH), and are committed to safeguarding a work

environment free from all such behaviour. Further guidance is provided in the Basel Institute's "Safeguarding Policy" which can be found and accessed on the Basel Institute's official website.

4.6 Use of confidential information

We protect confidential information provided to or generated by the Basel Institute and refrain from unauthorised disclosure. Information that is not publicly available is not to be used for any private or professional gain. This responsibility continues after employment or contract for services at the Basel Institute have ended.

4.7 Use of Basel Institute assets and facilities

We ensure that Basel Institute assets and facilities are used and handled in a responsible manner. A rule of reason applies to the personal use of premises and equipment of the Basel Institute.

The use of channels and mediums of communication of the Basel Institute to express personally held views on any political matters is prohibited.

4.8 Safety and security

The safety, health and welfare of our staff is the utmost importance. All operational decisions, including those relating to field trips and missions, are taken with this principle in mind.

4.9 Environmental responsibility

We strive to minimise the negative environmental impacts of our activities.

4.10 Anti-corruption

We repudiate all forms of corruption and bribery, whether direct or indirect, and do not offer, promise, pay or accept improper payments or other undue advantages. Further guidance is provided in the Basel Institute's "Anti-Bribery and Anti-Corruption (ABAC) Policy" which can be found and accessed on the Basel Institute's official website.

4.11 Conflict of interest

Conflict of interest may arise between personal interests and the interests of the Basel Institute, our partners or others with whom we have relationships. Conflict of interest and any appearance thereof should be identified, avoided wherever possible, disclosed and resolved in a transparent manner.

4.12 Gifts, donations and sponsorships

As a general rule, we do not solicit, offer, make or accept any gifts, favours or gratuities in connection with our professional duties. However, in line with the Basel Institute's "Anti-Bribery and Anti-Corruption (ABAC) Policy", occasional gifts may be provided and accepted, if they are modest and inexpensive and not prohibited by local law and regulation. Please refer to the ABAC Policy for further guidance.

4.13 Competition

We are committed to open and fair competition and compete on the merits and quality of our products and services.

4.14 Due diligence

We conduct due diligence on potential partners before entering into any contractual agreement, using a risk-based approach.

5 Implementation of the Code of Ethics

5.1 Reporting procedures

Staff who witness or become aware of a breach of the Code, be it actual, potential or suspected, are obliged to report the incident.

The Basel Institute is committed to taking all reports seriously and to examine and investigate them promptly. In the event of a breach of the Code, the Basel Institute is committed to ensuring that appropriate action is taken in a consistent, reasonable and fair manner. Such action may include sanctions (including dismissal) against those who have violated the Code. In the event of a grounded suspicion of fraud or other misuse against donor funds, the concerned donor will be informed by the Management immediately and in writing.

Further guidance and a detailed description of the available reporting channels is provided in the Basel Institute's "Whistleblowing (WB) Policy" which can be found and accessed on the Basel Institute's official website.

5.2 Responsibilities of the Basel Institute's Management and Chief Compliance Officer (CCO)

Management and/or the Chief Compliance Officer (CCO) shall regularly train and raise awareness of the Code among staff and partners and shall provide advice and guidance when requested.

Management and the CCO are responsible for periodic reviews and revisions of the Code. The Basel Institute's Board shall approve any revisions to the Code.

All substantive changes to this Code shall be duly registered in the historical table below and communicated to all staff in writing.

6 Further applicable documents

Other documents that provide the frameworks for ensuring that the principles and values of this Code of Ethics are applied include other Basel Institute policies (as listed below), laws, international standards and best practices applicable to our work, the Basel Institute's Organisational and Staff Rules, and its Vision and Mission statements.

Other related Basel Institute policies:

- Anti-Bribery and Anti-Corruption (ABAC) Policy"
- Safeguarding Policy
- Whistleblowing (WB) Policy

7 Revision history

Version No. / Date	Section	Description of Change (s)
1.0 20 April 2018	Values and guiding principles	More explicitly state the broad scope of the application of the Code of Ethics
	Recruitment	Inclusion of "any other differences" to ensure that all possible grounds for which discrimination can happen and which we repudiate are included

Staff relations Deleted because included in "Fairness, diversity and respect" Reporting procedures Clarify that any actual, potential or suspected breach of the Code must be reported More explicit reference to the possibility of making anonymous reports More firmly state the commitments of the Basel Institute react to reports and how this is done Reference to the obligation to train staff on the Code of Ethics and make them actively aware of all changes to Code of Conduct included 14 Dec 2018 Reporting procedures Inclusion of obligation to inform concerned donor(s) in case of grounded suspicion of fraud or other misuse against donor funds 3.0 Safeguarding, fairness, diversity and respect Inclusion of obligation to make the Basel Institute's responsibility in relation to "safeguarding" more visible Reporting procedures Inclusion of obligation to maintain a register of all issues reported to the Basel Institute in line with its Reporting Procedures, including how these issues were dealt with procedures, including how these issues were dealt with of Institute communications channels and mediums for dissemination of personal political views. 4.0 Safeguarding, fairness, diversity and respect Safeguarding, fairness, diversity and respect Safeguarding, fairness, as Well as to reinforce safeguarding from SEA as well as to reinforce conduct expectation of partners of the Basel Institute in regard to Safeguarding, fairness, as well as to reinforce conduct expectation of partners of the Basel Institute in regard to Safeguarding, fairness, as well as to reinforce conduct expectation of partners of the Basel Institute in regard to Safeguarding, fairness, as well as to reinforce conduct expectation of partners of the Basel Institute in regard to Safeguarding, fairness, as well as to reinforce conduct expectation of partners of the Basel Institute in regard to Safeguarding, fairness, as well as to reinforce safeguarding.			
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Scope

Safeguarding, fairness, diversity and respect

Anti-corruption

Gifts, donations and sponsorships

Reporting procedures

Responsibilities of the Basel Institute's Management

Further applicable documents

Various sections were revised to account for the introduction of the ABAC- and WB policies at the Basel Institute and to ensure a consistent wording between the CoE and the newly introduced policies.