

# Basel Institute on Governance

## Code of Ethics

Approved by Foundation Board on 16 October 2019

# Preamble

The Basel Institute on Governance (herein after referred to as the “Basel Institute”) is a not-for-profit organisation established as a foundation according to Swiss law and associated with the University of Basel. 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. It specialises in corruption prevention and public governance, corporate governance, compliance and collective action, anti-money laundering, criminal law enforcement and the recovery of stolen assets.

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.

# Scope

References to the Basel Institute in this Code of Ethics include all foundation board members, employees, officers and directors (hereinafter referred to as “staff”).

Third parties who act for or on behalf of the Basel Institute are also required to abide by the standards set out in this Code of Ethics.

# 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.

# Our standards

## **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.

## **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.

## **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.

## **Abuse of authority**

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

## **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 believe we have a responsibility to treat each other with dignity, which means appreciating diversity, whether that diversity exists because of race, religion, gender, sexual orientation or any other difference. We value and promote a workplace that is safe, inclusive and fair and which fosters respect for all of our fellow employees, customers, and partners.

As part of our everyday work experience we strive to create an environment of trust in which personal dignity, privacy, and the personal rights and safety of every individual is safeguarded. We believe respect in the workplace is fundamental to performance and engagement.

We do not tolerate any forms of bullying, harassment, exploitation, abusive behaviour, or intimidation, sexual or otherwise, and are committed to safeguarding a work environment free from all such behaviour; we expect our employees to demonstrate courtesy and respect in all their dealings with each other, with everyone with whom we work, and in the communities in which we operate.

## **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.

## **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.

### **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.

### **Environmental responsibility**

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

### **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.

### **Conflicts of Interest**

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

### **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. A small gift of nominal value may exceptionally be accepted in situations where not doing so would create an embarrassment. In such cases, the gift that has been accepted shall be handed over to the Basel Institute and shall not be kept for personal use. Similarly, a small gift of nominal value may be offered as a courtesy gesture to staff and third parties with prior approval from management.

### **Competition**

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

### **Due diligence**

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

## **Implementation of the Code of Ethics**

### **Reporting procedures**

Staff who witness or become aware of a breach of the Code, be it actual, potential or suspected, must report the incident. Such reports shall in the first instance be communicated to the direct line manager. In the event that a reporting person deems such course of action unsuitable, he/she may report to the next managerial level, or to a Basel Institute board member of choice. Should all such options be exhausted or if the line manager deems it necessary, an external third party's opinion may be sought based on advice from, or in consultation with the Basel Institute's management or board.

All reports shall be treated with strict confidentiality. No one shall be discriminated, disciplined or reprimanded for reporting in good faith concerns regarding breaches of the Code, or for requesting guidance concerning the Code. If preferred, reports can be made anonymously, for instance by postal mail.

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.

The Basel Institute will keep a register of all issues raised in relation to this Code of Ethics, including how these issues were dealt with, in particular but not exclusively in relation to safeguarding.

### **Responsibilities of the Basel Institute’s Management**

Management shall regularly train and raise awareness of the Code among staff and partners and shall provide advice and guidance when requested.

Management is responsible for periodic reviews and revisions of the Code. It may appoint staff to that effect. 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.

## **Further applicable documents**

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

### **Historical changes to the Code of Ethics**

<b>Date</b>	<b>Section</b>	<b>Changes</b>
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
	Fairness, diversity and respect	New section to bring together all aspects in relation to fairness, diversity and respect in one section rather than spread across Code of Ethics
	Staff relations	Deleted because included in “Fairness, diversity and respect”
	Reporting procedures	Clarify that any actual, potential or suspected breach of the Code <b>must</b> be reported

		More explicit reference to the possibility of making anonymous reports
		More firmly state the commitments of the Basel Institute to 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 the 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
16 Oct 2019	Safeguarding, fairness, diversity and respect	Section was revised 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.
	Use of Institute assets	Inclusion on a paragraph specifying the prohibition of use of Institute communications channels and mediums for dissemination of personal political views