

APPROVED

General Director

Transparency International-Russia

PSH

## **Code of Ethics**

### **1. 1. General provisions**

#### **1.1. 1.1 Purpose of the Code of Ethics**

- 1.1.1. Activities of the Autonomous Non-Commercial Organization Center for Anti-Corruption Research and Initiatives "Transparency International-R" (hereinafter also referred to as "TI-R Centre", the Organization) are based on the implementation of projects and programmes designed to identify and prevent corruption-related offences, as well as eliminate their consequences and promoting intolerance towards corrupt behaviours in society.
- 1.1.2. Since the activities of the organization are inextricably linked with ethical risks of unacceptable behaviour on the part of the organization's employees themselves, as well as with the need to ensure proper protection of information, including personal data of corruption whistleblowers, it is necessary to ensure that all persons involved in the activities of ANOC TI-R Centre are guaranteed to be unconditionally professional, impartial and honest in order to ensure that the organization meets the highest ethical standards in its operation.
- 1.1.3. We, the employees of TI-R Centre (hereinafter referred to as "We") in adopting this Code of Ethics (hereinafter referred to as "Code of Ethics") want to work honestly, openly, and consistently. We also want to recognize the importance of being open with persons and entities who financially support us (hereinafter referred to as "Donors") and to the society in which we operate.
- 1.1.4. This Code of Ethics sets out the main ethical principles that guide our organization and the main mechanisms that we use to address ethical issues.

#### **1.2. Organization: mission, purpose and values**

- 1.2.1. The TI-R Centre is a Russian non-profit organization operating in Russia since 2000. It consists of its head office in Moscow and regional centers.
- 1.2.2. The TI-R Center is part of Transparency International, a network of independent national offices in more than 100 countries, united through [shared values](#):
  - a) Transparency;

- b) accountability;
  - c) Integrity and solidarity;
  - d) honesty and incorruptibility;
  - e) the rule of law;
  - (f) Democratic foundations.
  - g) Natural resource conservation
- 1.2.3. The main objective of the Organization is providing services related to research and analysis, as well as studying public opinion on the issues of detection, prevention, suppression, and punishment for corruption-related offences, as well as promoting intolerance towards corrupt behaviours in society. In order to achieve this goal TI-R Centre is focused on three main tasks:
- (a) Providing legal advice in corruption cases;
  - (b) Institutionalization of the concept of transparency;
  - (c) Preventing corruption by ensuring the effectiveness of anti-corruption mechanisms.
- 1.2.4. In its activities the TI-R Centre considers society as a priority actor in combating corruption and ensuring transparency and accountability in the activities of government agencies.
- Corruption is understood by the TI-R Centre to mean the abuse of their position by an official or a person performing managerial functions in a commercial or other organization for the purpose of obtaining material or non-material personal or collective benefit;
  - Transparency and accountability refers to a system of effective mechanisms of public control and public access to information related to the performance of public functions.
- 1.2.5. The TI-R Center seeks to follow the principles of transparency in its own activities. These principles imply competition for programs and projects; wide public access to information about the Organization's activities, its financial history and selection principles, as well as strict adherence to the Code of Ethics.

### **1.3. Scope of the Code of Ethics**

- 1.3.1. All persons connected with the organization through employment relationships, irrespective of their form of employment, the position they hold, and duration of the contract, including the head of the organization (hereinafter employees); persons working with the organization under civil law contracts, the subject of which are issues related to the fight against corruption; volunteers, as well as all persons who are members of the supreme governing body of the organization voluntarily undertake to comply with the provisions of this Code of Ethics.
- 1.3.2. The Code of Ethics applies to employees, volunteers, and persons working under agreements of civil law nature, the subject of which are issues related to fight against corruption, from the moment they sign an employment and/or voluntary assistance agreement and/or a civil law agreement with the organization. Members of the

supreme governing body (General Meeting of Founders) are subject to the Code until they terminate their status as founders of the organization.

#### **1.4. Status of the Code of Ethics**

- 1.4.1. This Code of Ethics is a local act of the TI-R Centre, adopted in accordance with the legislation of the Russian Federation.
- 1.4.2. The obligation to follow the Code of Ethics is included in the employment contracts and job descriptions of employees in the organization; in the civil law contracts of the persons working with the organization regarding issues related to the fight against corruption; in the contracts regarding rendering voluntary assistance with volunteers of the organization.
- 1.4.3. This Code of Ethics is posted on the official website of the organization at <https://transparency.org.ru/>.

## **2. Basic principles**

### **2.1. Independence**

- 2.1.1. We form our position and take decisions in complete independence from persons not connected to the organization. The persons not connected to the organization according to this Code includes everyone except: employees, members of the supreme governing body of the organization, persons working under a civil law contract regarding issues related to the fight against corruption, and volunteers of the organization. In particular, such non-connected persons include: donors, other non-profit organizations, including political parties; commercial organizations, public authorities, individual officials and other individuals.
- 2.1.2. The TI-R Centre seeks to raise funds from various sources. The policy of the Organization in the field of funding is described in Section 16 ("Financing") of this Code of Ethics.
- 2.1.3. Our organization is a non-governmental organization and is not a member of any state authority. TI-R Center does not support political parties or candidates for elections at any level, does not participate in election campaigns at any level.

### **2.2. Reliability of Information and Objectivity**

- 2.2.1. Employees and associated persons take all necessary measures to ensure that our activities are based on relevant data.
- 2.2.2. The organization guarantees that all public statements made on behalf of the organization by authorized persons, as well as research and investigation materials, are based on the principles of maximum objectivity and independence.

### **2.3. Openness and Accountability**

- 2.3.1. We are aware of our responsibility to society in general and to those directly affected by our activities in particular. It is in our interest that society has comprehensive information resources about our activities. Our disclosure policy is based on a voluntary commitment to disclose information, except for cases provided in Section 5.5.2 of this Code.
- 2.3.2. Disclosure of information is achieved by uploading it to the official website of the organization at <https://transparency.org.ru/>.

### **2.4. Aversion to Corruption**

- 2.4.1. We do not tolerate any form of corruption, including facilitation payments. We do not bribe or take part in any other corrupt practices and expect the same from all persons with whom we interact. We pledge to report any suspected case of corruption that comes to our attention.
- 2.4.2. We do not use financial instruments related to offshores, including offshore companies.

### **2.5. Integrity**

- 2.5.1. Employees and volunteers of the organization, as well as persons working under civil law contracts regarding issues related to the fight against corruption, shall treat their own duties in good faith and guarantee their own competence in the performance of their duties and work.

### **2.6. Respect and Trust**

- 2.6.1. We undertake to treat each other and those with whom we interact in the course of our activities with respect and attention. By doing so, the TI-R Centre seeks to avoid any form of harassment and discrimination, and to hire, promote, and pay its employees according to their qualifications and demonstrated ability to perform their job duties. As an employer of equal opportunities, the organization treats all its employees fairly, regardless of their age, race, nationality, religion, sex, color of their skin, pregnancy, marital status, disability, and sexual orientation.
- 2.6.2. Employees and volunteers of the organization shall consult with each other in a collegial and open manner, in a manner that promotes the effective and conscientious performance of each employee's duties.
- 2.6.3. Our organization strives to maintain an environment in which employees and volunteers are free from physical, sexual, psychological, or verbal aggression, as well as abuse by managers and colleagues. The organization adheres to the principle of zero tolerance towards any form of harassment, including sexual harassment, verbal abuse or threats, offensive comments, rough jokes, unwanted letters or calls, displays of offensive or humiliating photographs, lustful gestures, unnecessary touching or other similar actions.

- 2.6.4. If an employee and/or volunteer believes that their interactions with their supervisor and colleagues is happening in a manner that is not conducive to a productive and safe job, they should report the situation to their supervisor and/or the Conflict of Interest Management Committee.

### **3. Conflict of Interest**

- 3.1. In the course of performing their official duties, an employee; member of the supreme governing body of the organization; a person working with the organization under a civil law contract regarding corruption-related issues; or a volunteer of the organization (hereinafter referred to as "Related Persons") may find themselves in a situation of conflict of interest. This, in turn, may result in these persons making decisions based on their personal interests (or those of third parties), rather than those of the organization. Making decisions based on personal interests is not acceptable. We therefore commit ourselves to avoiding conflicts of interest and to take timely action to resolve them. The policy on conflict of interest management must be adhered to by all Related Parties who are subject to this Code of Ethics.
- 3.2. The policy of TI-R Center with regard to conflicts of interest is based on the idea that in the performance of their professional duties the Related Persons shall be guided by the interests of the organization. It is inadmissible to make decisions based on their personal interest and in ways that are detrimental to the interests of the organization.
- 3.3. Personal interest refers to the opportunity for a Related Person to benefit directly, or in the interest of a Related Person's spouse, cohabitant, children, parents, siblings, cousins, siblings of parents, grandparents, grandchildren, friends, and acquaintances, as well as persons with whom the person is financially and otherwise related.
- 3.4. Conflicts of interest in TI-R Centre are regulated in accordance with the Code on Conflict of Interest, dated 28.10.2016.4.

### **4. Gifts and Rewards**

- 4.1. Related parties will waive any gifts, including discounts, services, meals, entertainment, travel, and recreation (hereinafter referred to as "Gifts"), if any Related party has reason to believe that it was done in order to influence that person's performance of their obligations to the organization, or it is possible that the Gift might be seen as such influence. Refusal must be made within a reasonable time.
- 4.2. The Gifts listed in 4.1. With a value of 3000 (three thousand) roubles or more shall be registered in the Register of Gifts of the organization (Annex 1). The Register of Gifts will state:
- the person who received the gift (full name and title),
  - the gift giver (name and title),
  - the date of receipt,

- the approximate value of the gift,
  - the way the gift is used.
- 4.3. The person who received a Gift that is subject to registration reports the receipt of the Gift to their immediate superior and the secretary of the organization responsible for keeping the Register of Gifts (Annex 1). The message is sent out as an e-mail to the work mailboxes (@transparency.org.ru) of the immediate supervisor and to the conflict of interest commission, which should contain: a description of the Gift, from whom it was received, and for what reason. The secretary of the organization registers the gift in the Register of Gifts. The secretary provides a register of gifts for inspection at the request of any staff member and member of the highest governing body. The register is maintained electronically.

## **5. Disclosure and Protection of Information**

### **5.1. General provisions**

- 5.1.1. The Information Disclosure Policy aims to protect the rights and legitimate interests of Related Persons, Donors and Applicants, as well as to increase trust with civil society.
- 5.1.2. The organization is obliged to disclose and make available for public control the main financial information of TI-R Center, as well as information about the organization's projects, partners, and information sources, in accordance with the legislation of the Russian Federation regarding protection of information and personal data, except for the information specified in clause. 5.5.2 of this section.
- 5.1.3. As a not-for-profit organization, we carry out our activities in the interests of society and strive to be as open as possible in informing the society about our work. 5.1.3 As a not-for-profit organization, we carry out our activities in the interests of society and strive to be as open as possible in informing the society about our work. At the same time, we consciously do not disclose information in the cases stipulated in clause 5.5.2. of this Code.

### **5.2. Principles of Information Disclosure**

- 5.2.1. In our decision to disclose certain information, we are guided by the following principles:
- a) regularity and timeliness of information;
  - b) accuracy and completeness of information;
  - c) availability of the information to be disclosed;
  - d) A reasonable balance between transparency and protection of personal data.

### **5.3. Information Security**

- 5.3.1. The organization guarantees security of storage and confidentiality of personal data of Related persons, donors, and other third parties with whom the organization

cooperates; the organization pledges to use personal data of Related persons, donors, and other third parties in public only with their personal consent;

- 5.3.2. The organization makes every effort to guarantee the security of information communicated to the organization by corruption whistleblowers. The organization may use the information received publicly only after obtaining the consent of the person who shared the information. We will do our best to protect the confidentiality of the person who shared the information.

#### **5.4. Confidentiality of Information**

- 5.4.1. The Organization shall strive for maximum objectivity and reliability regarding information it shares;
- 5.4.2. When receiving information from third parties, the organization shall verify the reliability of the information received through all available sources before its public distribution on the official website of the organization and its social networks, printed publications, as well as before transferring the information to third parties, in order to protect its reputation.

#### **5.5. Information Disclosure Procedure**

- 5.5.1. The Organization undertakes to make every effort to respond to requests for information received, with the exception of information mentioned in clause 5.5.2 of this Article.
- 5.5.2. Reasons for refusing to disclose information:
- a) Privacy: where the information concerns private individuals, in accordance with Russian law.
  - b) Damage to the interests of the Organization: if we believe that disclosure of information may jeopardize our ability to fulfill our mission.
  - c) Internal information: if the information relates to internal communication or administration of an organization, with no outside relevance.
  - d) If there is reason to believe that the disclosure of the information may violate the rights and legitimate interests of the organization, its related persons and third parties.

### **6. Financing**

#### **6.1. General provisions**

- 6.1.1. The main source of funding for TI-R Centre is donations. Therefore, an important task facing the Organization is achieving a high level of transparency in all areas of activity, including funding, both to reduce reputational risks (openness to Donors) and to reduce legal risks.

## **6.2. Sources of funding for the organization**

6.2.1. TI-R Centre has the following funding sources:

- a) Grant support from foreign donors;
- b) Grant support from Russian donors;
- c) Support from businesses;
- d) Targeted donations for statutory activities;
- e) Profit from income generating activities;
- f) Founders' funds.

## **6.3. List of situations in which we refuse funding**

- a) The funding objectives are contrary to the statutory objectives and mission of the organization;
- b) The funding may prevent the organization from making its own decisions and/or be contrary to other provisions of this Code;
- c) Funding may increase the reputational risk to the organization;
- d) the source of funding is a political party and/or a candidate for election at any level and/or a person holding an elected office and/or a person or legal entity that has direct or indirect affiliation with such organizations and individuals.
- e) The source of funding is an organization whose activities have been deemed undesirable in the Russian Federation;
- f) The source of financing is an organization whose activities are prohibited in the territory of the Russian Federation;

## **7. Violation of the Code provisions**

### **7.1. Report of violation of the Code of Ethics**

- 7.1.1. The procedure for reporting a violation of the Code of Ethics has the same sequence as the procedure for reporting a conflict of interest (Clause 4 of the Conflict of Interest Regulation, dated 28.10.2016), except for the exceptions established by this Code.
- 7.1.2. A notice shall be submitted through a special online form, a link to which shall be communicated to each person mentioned in this Code by sending a link to the work e-mail address (@transparency.org.ru), as well as to the e-mail address specified in the civil law contract or volunteer's contract as a contact.
- 7.1.3. Violation of the provision(s) of the Code of Ethics is reputational damage to the TI-R Centre.



## **8. Procedure for Familiarization with the text of the Code**

### **8.1. Persons connected with the organization with a working relationship**

8.1.1. Before signing the employment contract, each candidate for a position must familiarize themselves with the contents of the Code of Ethics. If the Code is not available on the Organization's website for technical reasons, the candidate shall be provided the text of the Code for review. The candidate for a position shall have one working day to get acquainted with the Code. At the end of this period, the candidate will be interviewed. During the interview, the candidate for a post may ask the head of the organization any questions they may have as a result of their familiarization with the Code. After that, the head of the organization checks in a free form the candidate's understanding of the Code and their readiness to follow it. The candidate's understanding of the ethical principles and related obligations set out in the Code, as well as the candidate's agreement to follow these standards, and comply with these obligations, expressed orally during the interview, are a prerequisite for signing an employment contract with the candidate for a position. In the case of a successful interview, the candidate for a post records the fact of familiarizing themselves with the Code by signing the employment contract, which states as a condition familiarization with the Code; they then sign the job description.

### **8.2. Persons involved with the organization through civil law relations**

8.2.1. Persons working with an organization under civil law contracts, related to anti-corruption issues, must read the Code on the organization's official website at <https://transparency.org.ru/> before signing the contract. A person records that they have become acquainted with the Code, and that they are prepared to follow its provisions by signing a civil law contract containing a condition of acquaintance with the Code.

### **8.3. Volunteers in the organization**

8.3.1. The procedure stipulated in clause 8.1. for persons connected with the organization through labor relations shall apply to volunteers of the organization, except for the exceptions established by this Code.

8.3.2. Candidates for Volunteers must read the text of the Code and be interviewed on their understanding of the provisions of the Code before a final decision on their involvement in the organization is made. The person responsible for the organization and conduct of these activities is the person designated by order of the Director. The person responsible for the organization and conduct of these activities is the person designated by order of the Director. A candidate for a volunteer position may be involved in the activities of the organization only if they have demonstrated during their interview an understanding of the ethical principles and related commitments set out in the Code, and if they have agreed to follow these standards and comply with these commitments.

*Annex No. 1*  
*to the Code of Ethics*

**List of gifts which TI-R employees have got**

№	Person who have got the gift	Donor	Date when the gift was get	Approximate gift value	The gift's use way	Signature the person responsible for the gifts list
1.						