



EEB Code of Conduct

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I. Introduction

The integrity and reputation of the European Environmental Bureau (EEB) depends on the ability of its staff, the members of its Board and Council and those engaging in the organisation's structures such as the General Assembly or Working Groups, to uphold and promote the highest standards of ethical and professional conduct and to comply with the law. Adherence to this Code and to other EEB policies is essential to ensuring a safe and inclusive working environment and to maintaining and building our reputation for fair and ethical practices among employees, members, donors and other external stakeholders.

This Code clarifies what we can expect from each other and what the EEB expects from its staff, the members of its Board and Council, and those engaging in the organisation's structures such as the General Assembly or Working Groups in terms of acceptable behaviour. For staff members, such expectations are also laid out in the employment contracts, Staff Terms and Conditions and internal policies and for the EEB Board and Council members in the internal Governance Handbook, in particular the section 'Code of ethics, confidentiality for Board and Council members'. Moreover, the Code of Conduct seeks to provide guidance on expected behaviour to implement EEB policies such as the EEB Anti-Corruption Policy, the EEB Diversity, Equality and Inclusion Policy, EEB Anti Sexual Exploitation, Abuse and Harassment (SEAH) and Safeguarding Policy, and the Sustainability Statement.

II. EEB values

This Code is based on the EEB's agreed core values. These values are a foundation that guides the actions of all those working with and representing the EEB both inside and outside of the organisation.

The EEB stands for sustainable development, environmental justice, global equity, transparency and participatory democracy. It promotes the principles of prevention, precaution and the polluter pays principle.

The EEB's internal value statement reads:

- **Democracy:** We are a representative and inclusive organisation
- **Fairness:** We are committed to justice, equality and non-discrimination
- **Respect:** We provide an enabling, nurturing work culture that inspires excellence
- **Integrity:** We advocate policies based on science and communicate with honesty
- **Sustainability:** We strive to practice what we preach, applying green principles to our work.

III. Scope of the Code of Conduct

This Code applies, as indicated, to EEB staff, paid interns and volunteers, to Board and Council members, and to those engaging in the organisation's structures and events including the General Assembly or Working Groups. It extends to all activities and transactions for which the EEB is responsible regardless of where they take place.

IV. Rules of conduct applying to everyone who engages with the EEB

When engaging with the EEB, regardless of whether you are a staff member (including interns and volunteers), member of the Board or Council, represent a member organisation, attend EEB events or engage on our mailing list or serve as an external expert, we expect that:

1. You will act with honesty and integrity and conduct yourself in a professional manner.
2. You will challenge and not engage in any form of harassment, discrimination, hate speech intimidation, exploitation or abuse.
3. You will commit to creating a safe, inclusive, courageous and caring space.
4. Depending on your role, you will acknowledge that power dynamics play a role in how your comments, behaviour and ways of communicating may be received or given.
5. You will listen and consider others' opinions.
6. You will not interrupt others (unless they go over their share of speaking time).
7. While you may vocalise your own opinions with vigour and passion, you will be considerate of other opinions and other people's feelings.
8. You will practice empathy and compassion for different views and opinions, and not attack other opinions in a personal or hurtful way, or directly question other people's values or commitment if you disagree with them.
9. If your language or behaviour are called out as being discriminatory or otherwise disrespectful, you will listen, acknowledge the feedback, and take responsibility. You will try to repair the harm and avoid repeating such language or behaviour in the future.
10. You will follow health and security instructions and procedures and avoid behaviour that may expose yourself or others to unnecessary risk.
11. Buying, selling or using illicit drugs while on the EEB premises or while representing or engaging with the EEB is forbidden.
12. Being under the influence of illicit drugs is forbidden under any circumstance, so is being under the influence of alcohol during professional activities excluding networking events and receptions as part of the professional activities, for which consumption should be moderate and conscious.

V. Rules of conduct applying to all EEB staff, interns and volunteers and to Board and Council members where active for the EEB

All rules laid out under section IV apply. In addition to the rules for everyone engaging with the EEB, the following rules apply to EEB staff, interns and volunteers and to Board and Council members where active for the EEB.

1. General conduct

- 1.1 You will promote environmental protection and human rights and oppose criminal or unethical activities.
- 1.2 You will abide by this Code of Conduct and all legal obligations and maintain the highest ethical standards in a manner that will contribute to achieving and implementing the vision and values of the EEB. Where in doubt, you will ask your line-manager or other senior representatives of the EEB (for EEB staff) or the EEB President (for Board and Council members) for advice as adequate.

- 1.3 You will uphold the integrity and reputation of the EEB by professional and personal conduct being consistent with the EEB's value, mission and vision. You will be accountable for your professional and personal actions ensuring that you use the influence and privilege that may come with your position for the achievement of the EEB's objectives.
- 1.4 You will act in the best interests of the EEB, separating personal interests, activities, and affiliations from the performance of professional responsibilities.

2. Preventing discrimination and (sexual) harassment

- 2.1 You will act in full respect of the EEB's Diversity, Equality and Inclusion Policy and the EEB's SEAH and Safeguarding Policy.
- 2.2 In line with the EEB's SEAH and Safeguarding Policy, you will not have sexual relations with minors (defined as under 18 years old). You will also not exchange money, offers of employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour, understanding that these standards exist to challenge sexually exploitative and abusive behaviour.

3. Ensuring independence and integrity

- 3.1 As a matter of principle, the EEB pays for its activities and expenses using its own resources.
- 3.2 You must not engage in corruption under any circumstances, and always comply with the EEB Anti-Corruption Policy.
 - 3.2.1 You must not accept money, goods or services, or demand money, goods or services from individuals or other organisations where there is no written agreement for cooperation and funding in return for services or influence.
 - 3.2.2 You will proactively guard against even the semblance of corruption.
 - 3.2.3 You will only accept gifts where the potential for or even the appearance of corruption is minimal and where the value of that gift is reasonable. When in doubt, you will consult with your line manager (for staff) or the EEB President (for Board and Council members). If impossible to consult in due time, you will not accept gift or gratuity.
 - 3.2.4 You will accept lunches, dinners and receptions that are paid by third parties only if necessary for your work and where the potential for or even the appearance of corruption is minimal. When in doubt, you will consult with your line manager (for staff) or the EEB President (for Board and Council members).
 - 3.2.5 You will accept visits involving travel and accommodation expenses paid by third parties only if the visit is in an official capacity, is demonstrably of great interest for the advancement of the objectives of the organisation, and if the potential for or even the appearance of corruption is minimal.
 - 3.2.6 If gifts or services are accepted in exceptional circumstances, full disclosure must be made to your line manager (for staff) or the EEB President (for Board and Council members). This disclosure must include: the nature of the gift or benefit, the source and date of receipt, the circumstances, estimated value, intended use, and whether (in the case of goods) it will be handed over to the EEB.

4. Impartiality and avoiding conflict of interest

- 4.1 You will not act in a partial manner. That is, you will not use your position or influence to further your own interests or that of affiliated parties in any way. Any form of favouritism or nepotism is forbidden.
- 4.1.1 You will proactively avoid even the appearance of partiality; that is, of self-interest or favouritism.
- 4.1.2 To prevent that appearance of partiality, you will avoid, when possible, placing yourself in any situation where self-interest or those of affiliated parties are present.
- 4.1.3 Employees, Board and Council Members have a duty to report if friends or family are involved in negotiations and make sure that no situations arise that could create the semblance of favouritism towards friends and family.
- 4.1.4 Employees, Board and Council Members have a duty to report if friends or family are involved in recruitment processes that the employee, Board or Council member is involved in and ensure that no situations arise that could create the semblance of favouritism towards friends and family.
- 4.2 As an EEB employee, you have a right to take up other employment next to the EEB or engage in volunteering activities. You will, however, declare to your line manager all paid or unpaid external activities that may have bearing on your employment. Where secondary employment or other forms of paid work happen in an area identical or similar to the EEB's area of work, the Secretary General needs to approve those.
- 4.2.1 The right to take up other employment (as an EEB staff member) or to engage in other activities (as a staff, Board or Council member) is limited the following situations:
- where the public knowledge of this fact would adversely reflect upon the EEB's mission, vision and values, or otherwise mislead the public;
 - that conflict or appear to conflict with your duties;
 - that may use your knowledge of confidential information gained through your work at the EEB;
 - and that will, or is likely to, negatively influence the performance of your work or engagement for the EEB.
- 4.2.2 If you seek a nomination and or run as a candidate or serve as a senior office bearer for a political party while working for or holding an office with the EEB, this will require approval from the Secretary General (for staff members) or the EEB President (for Board and Council members), and, where running for office, eventually a temporary suspension from your role at the EEB based on a mutual agreement.
- 4.2.3 You will not participate in any activity that might mislead or confuse the media or the public about whether you are representing another organisation or group in your capacity working for the EEB.
- 4.3 Staff members will ask their line manager when unsure whether outside employment or other outside activities may affect or appear to affect the proper performance of your own job.
- 4.4 You will report to your line manager and team lead (for staff members) or the EEB President (for Board and Council members) when you knowingly have financial interests in contracts or other business transactions undertaken by the EEB, or have family members, friends or business associates with such interests.
- 4.5 For staff, paid interns, volunteers and contractors, final decisions on whether a conflict of interest exists, will be decided by the Secretary General. For the Secretary General,

questions of conflict of interest must be referred to the EEB Board. For the Board and Council, questions of conflict of interest must be referred to EEB President, or the General Assembly where the President is affected.

5. Financial responsibility

- 5.1 You will ensure that you use EEB funds and resources entrusted to you in a responsible manner.
- 5.2 You will account for all money and property in your care.
- 5.3 You will strive to ensure value for money in spending EEB funds.
- 5.4 As a staff member, you will use working hours as a resource of the EEB, responsibly and for the purpose they are intended.
- 5.5 You will follow policies, procedures and guidelines for managing and using EEB funds and resources.

6. Use of organisational property, services and other resources

- 6.1 Organisational property, services and other resources belonging to the EEB will be used with care.
- 6.2 Personal use of equipment provided by the EEB will be within reason and must not impede the employee's productivity or work functions.
- 6.3 The private use of the Internet during office hours is tolerated as long as it is kept to an acceptable minimum, providing it does not affect the work and performance of the individual and their colleagues.
 - 6.3.1 Content that is pornographic, racist, homophobic, transphobic, sexist, ableist and otherwise discriminatory may not be uploaded, downloaded, or disseminated.
 - 6.3.2 Intellectual property laws must not be violated by uploading, downloading or disseminating any copyrighted material unless this is outweighed by the societal importance.
- 6.4 Software may only be installed with the approval of the Office & IT Team.
- 6.5 Reuse has priority over new acquisitions. Organisational property shall be sold, recycled, or disposed of in an environmentally friendly way if it does not make sense to use it any longer in line with the EEB's Sustainability Statement.

7. Environmental responsibility

- 7.1 You will seek to protect the environment in all your activities related to your role in the EEB.
- 7.2 You will actively support the EEB's goal of minimising the environmental impact of your work, in line the EEB's Sustainability Statement.

8. Working together and ensuring a safe and supportive environment

- 8.1 You will work cooperatively with your colleagues, manager(s), subordinates, with and among Board and Council Members, those representing EEB members and colleagues from partner organisation, donor organisation or any other organisation involved in EEB activities to achieve the objectives, targets and goals of the organisation.
- 8.2 You commit to supporting each other in your work and in our joint activities and to constructively resolve conflicts that may occur.

- 8.3 You will show loyalty towards everyone working for, representing the EEB and engaging with the EEB and avoid gossip, conversations or actions with others that seek directly or indirectly to undermine or demean another colleague or their work.
- 8.4 You will be kind and mindful of your communication style being positive, encouraging, curious, supportive, non-violent and non-judgemental.
- 8.5 Those making decisions will give relevant affected people an opportunity to input before decisions are taken.
- 8.6 You will adhere to decisions and directions once they have been taken and refrain from ongoing “campaigning”.

9. Information and confidentiality

- 9.1 You will not disclose or release by any means to any member of the public, any confidential information acquired by virtue of your position, in either oral or written form, except when required by law or authorised by the organisation to do so.
- 9.2 Depending on your role, you will seek authorisation before communicating externally in the EEB’s name and will avoid any unintended detrimental repercussions for the EEB.
- 9.3 You will not use confidential information for personal or private gain, or for the gain of relatives or any person or corporation.
- 9.4 If uncertain about whether information is considered confidential, you will seek advice from your line manager (for staff) or the EEB President (for Board and Council members).
- 9.5 You will not hide mistakes or errors but take responsibility for them and be open and transparent.

VI. Compliance with this Code of Conduct

- 1. For the EEB Secretariat and its activities, including internal EEB meetings such as Working Groups and external events, the Senior Management Team oversees compliance with the Code under the leadership of the Secretary General.
- 2. For the EEB Board and Council, the EEB President and Vice-Presidents oversees compliance with the Code.
- 3. If you doubt whether an action is a breach of the Code, please ask your line manager and team lead (for staff) or the EEB President (for Board and Council members) for advice.
- 4. For staff members, if you believe that another staff member violates the Code, in the first instance you will discuss with the colleague in question to prevent the violation from happening and to allow the possibility for the colleague to report this themselves. In a next step, you can raise the situation with the colleague’s line manager who will seek to mitigate the situation.
- 5. If you believe that a person representing the EEB, such as a Board or Council member, or engaging with the EEB, violates the Code, you may bring this to the attention to the Secretary General and / or the EEB President, as you deem adequate, who will seek to address and mitigate the situation.
- 6. If the violation persists, or is not dealt with, or if it is not possible to first raise the issue directly with the affected person(s), you are encouraged to report an alleged violation through the EEB Complaints Handling Mechanism. The Secretary General will consider the situation and decided who will conduct any further investigation. If the Secretary General is involved, the mechanism foresees a complaint addressed to the EEB’s President.

7. When the steps above are not possible, where non-compliance constitutes severe and or systemic misconduct or in instances where you report the violation, but it persists, you should follow the procedures outlined in the EEB Whistleblowing policy.
8. The EEB Complaints Mechanism and the EEB Whistleblowing Policy lay out the process of how complaints and reports will be investigated and followed up.
9. Depending on the outcome of the investigation of a complaint or a whistleblowing report, disciplinary action may be taken against the person(s) violating this Code, including verbal warnings, written warnings, suspensions or termination of employment, exclusion from the EEB Board or Council or exclusion from future EEB events.

VII. List of related policies

EEB Complaints Handling Mechanism

EEB Whistleblowing policy

EEB's Sustainability Statement

EEB Anti-Corruption Policy

EEB Diversity, Equality and Inclusion Policy

EEB Anti Sexual Exploitation, Abuse and Harassment and Safeguarding Policy

EEB Sustainability Statement.

VIII. Annex

EEB Netiquette for email and chat communication

1. Give preference to direct contact, for instance, through a coffee machine chat, a short call or a meeting, instead of written messages.
2. Each emails needs a clear subject line that is immediately understandable.
3. Make sure identification is clear in all communications. Begin with a salutation ("Hi John and Rashida!") and end with your signature ("Ioannis Pittas, Scientist").
4. Think twice about the need to send written messages, to put people in copy or blind copy for information.
5. Respect out of office messages on email and do not disturb messages on chat platforms. Do not ask for responses or send messages that convey an unnecessary sense of urgency outside someone's working hours. Respect weekends and holidays.
6. Choose which channel to use depending on the content of your message as well as the urgency. Video calls can often help avoid misunderstandings and be more efficient than long email exchanges.
7. Review what you wrote and try to interpret it objectively. When we speak face to face and are misunderstood, we have an on-the-spot opportunity to rephrase our words. In writing, we must strive twice as hard to be understood, as we do not have the benefit of modifying or elaborating in real time.
8. All caps ("YOU NEED TO DO THIS NOW"), highlights ("Answer by 5pm") and exclamation points ("Give me a break!!!") can be misinterpreted as anger or pushiness without the appropriate context and are to be avoided.
9. If you would not say it face to face, do not say it online. When you are working online, you are safe behind a screen, but that is no excuse to be ill-mannered or say things you would never say in public. Things always sound one level less friendly when coming through an email.

10. Do not assume everyone understands where you are coming from. Sarcasm and wit are often the spice of in-person conversation, but in online discussion, it can not only lose its edge, but it can also bite.
11. You are communicating with people of all ages and cultures who have varied backgrounds, lifestyles and geographic locations. With this in mind, review what you wrote before contributing to the conversation and ask yourself, "Will everyone get the joke?"
12. Do not spam. Please do not take advantage of mailing-lists to forward emails and links regarding your political/spiritual beliefs or to sell your services.
13. Consider using emoticons. In emails and chats, emoticons can help convey feelings that may otherwise get lost in translation, including humour, exasperation, exhaustion and even confusion.
14. Respect others' privacy. Do not give out personal email addresses without permission.
15. Remember, if it is on the internet, it is everywhere. Do not share personal information about yourself in a public online forum, especially something that could put your safety or security at risk.
16. Forgive and forget. If you are offended by something someone says online, keep in mind that you may have misunderstood their intentions. Give them the benefit of the doubt.