

CODE OF ETHICS

For the Staff of the European Broadcasting Union

24.05.2017

1. Statement of Principles

Promoting and Representing Public Service Media in Europe	<p>The EBU is a member-driven association under Swiss law: It exists to promote and develop a number of public interest purposes, based on values such as human rights, freedom of expression, democracy, cultural diversity, tolerance and solidarity, and to help its Members to serve the interests of the general public in the best possible manner.</p> <p>To that end, the EBU's role is to make public service media indispensable by providing services that ultimately support Members in fulfilling their public service remit.</p> <p>As the representative of public service media in Europe, the EBU must embody the very highest ethical values both as an organisation and through the integrity and conduct of its Staff.</p>
Code of Conduct	<p>In its interaction with Members, employees, public institutions and commercial partners, the EBU has to operate with the utmost transparency, effectiveness, legality and neutrality. It must be able to withstand the most rigorous standards of public scrutiny.</p> <p>In discharging its obligations to Members, the EBU is bound to adhere to the Statutes but also to ensure that the conduct of its Staff members contributes to achieving its aims. The EBU strives always to achieve the highest ethical and professional standards, creating a culture of excellence. These standards must be preserved and, where possible, enhanced.</p> <p>Each Staff member, regardless of nationality or personal preferences, must work with complete probity, impartiality and respect of diversity, with fairness, diligence and good faith. In conducting their activities, Staff members must comply with all legal requirements as well as the EBU's body of policies and procedures, which reflect the highest ethical standards.</p>
Purpose of the Code	<p>The intention of this Code is to provide a clear re-affirmation of the standards which the EBU expects of its Staff, and of the standards which its Staff are entitled to expect of the EBU. The Code should be instrumental in promoting the EBU's reputation and in inspiring confidence (amongst the Staff, the public and the Members) in how the EBU conducts its activities.</p>

2. Scope of the Code of Ethics

EBU	This Code applies equally to the EBU headquarters in Geneva and to all of the EBU's subsidiaries and representative offices abroad. (hereafter "the EBU ").
Staff	This Code applies equally to all EBU staff members, regardless of whether they have a permanent or temporary fixed-term contract, including " EBU Management " (i.e. members of the EBU Management Committee, as well as all Staff members with a managerial responsibility, including senior and line managers). (hereafter " Staff " or " Staff members ")

3. The EBU's Commitment to Staff

Working Conditions	The EBU values the contributions of all of its Staff. To this end and to ensure the Staff's commitment to the EBU, over the longest term, the EBU will endeavour at all times to create a working atmosphere which is satisfying, stimulating and rewarding, in a safe and pleasant environment which fosters open communication.
Promotion of Training	The EBU will also endeavour to encourage, by practical means, staff development and training.
Communication and Sharing of Information	Those in leadership positions will communicate effectively with their Staff and share information with them. Where a decision is taken, all relevant facts and information should be taken into consideration.

4. The Staff's Commitment to the EBU

<p>General behaviour</p>	<p>Relations between Staff of all levels will be founded on mutual respect, trust and confidence, without favouritism.</p> <p>In addition to the EBU Values which are to be reflected by the Staff's behaviour (see below), the fundamental ethical requirements to be met by Staff members are competence, loyalty (placing the good of the EBU above personal, national or other interests), independence and impartiality.</p> <p>EBU Staff members must perform their job competently, act respectfully, loyally and honestly, and ensure that the EBU's reputation is not damaged in any way.</p>
<p>Respect & Recognition</p>	<p>In exercising their functions, Staff members will respect the EBU Values.</p>
<p>Service & Solutions</p>	<p>Staff members will respect each other and value their diversity. They will provide each other with clear and timely feedback and give credit to colleagues for their contributions and achievements</p>
<p>Team Spirit & Performance</p>	<p>Staff members are passionate in searching for and providing the best possible services and solutions to meet the highest expectations of Members and customers.</p>
<p>Creativity & Innovation</p>	<p>Staff members constitute one EBU, joining forces across the organisation to achieve common goals. Staff members strive for excellence in every aspect of their work actively sharing knowledge and best practices with each other.</p>
<p>Accountability & Responsibility</p>	<p>Staff members will constantly look for better ways to get things done, seeking and embracing innovative ideas and transforming these into reality.</p>
<p>Accountability & Responsibility</p>	<p>Staff members are accountable for their actions and behaviour. Work will be delivered on time and all actions and decisions will be communicated in a transparent manner.</p>
<p>Accountability & Responsibility</p>	<p>Staff members are also expected to comply with the letter and the spirit of all applicable laws, rules and regulations. When any doubt exists as to the legality of any action or arrangement undertaken by Staff members in the performance of their duty, the matter should be discussed with the EBU Legal Department.</p>
<p>Business and Fair Dealings</p>	<p>Staff must ensure that all business transactions are properly accounted for and reported on the EBU's finance systems.</p> <p>Staff involved in procurement activities on behalf of the EBU must ensure that:</p> <ul style="list-style-type: none"> • there is fairness and transparency both in the selection process and in the choice of suppliers, as well as honesty of subsequent business transactions. All dealings with third parties must be on an "arm's length" basis; • purchasing decisions must be made on the basis of competitive price, quality, delivery, service and reputation of the supplier; and • decisions taken must be objectively justifiable and conducted in accordance with the highest professional standards.

4. The Staff's Commitment to the EBU

(continued)

As a matter of principle, Staff should never offer, solicit or accept personal advantages or gifts, including hospitality favours or entertainment (hereafter "**Gifts & Advantages**") to or from third-party organisations or individuals with whom the EBU does, or is likely to do, business and which would compromise their position or damage the reputation of the EBU itself.

Acceptance of Gifts & Advantages

Staff members may accept Gifts & Advantages provided in the normal course of the Staff member's duties as long as these are unsolicited and provided that no more than one such Gift or Advantage has been accepted in any year from a single source. When such Gifts or Advantages are received, the beneficiary must inform their Director or line manager. The maximum value of any such Gift or Advantage for Staff members may not exceed CHF 200.

If it is not possible to refuse a Gift or Advantage that has an objectively higher value without causing serious offence, the recipient will inform the Director or the line manager. Any physical Gift will be handed over to the Human Resources Unit and its further disposition will be determined by the EBU Management Committee. If the value of a Gift received is not known but may exceed the maximum value, the relevant Director or line manager should be consulted. In case of doubt, the Director or line manager will consult the EBU Management Committee.

A checklist of the considerations to be taken into account before accepting a Gift or Advantage ("Checklist – Accepting of Gifts and Advantages") can be found on the Intranet

Offering of Gifts & Advantages

No Gifts or Advantages may be offered to third-party organisations or individuals without the prior approval of the relevant Director taking into account local laws and regulations. Any Gifts or Advantages exceeding CHF 200 per person or provided to the same person on more than one occasion in a single year require the Director General's prior approval.

For invitations to events either sponsored entirely or in part by the EBU or for which the EBU has been engaged as a commercial service provider, the maximum value may not exceed CHF 200. Any exception will require the Director General's prior approval.

In no case shall Gifts or Advantages that could be regarded as an inducement to obtain a commercial advantage be offered to third-party organisations or individuals.

A checklist of the considerations to be taken into account before offering a Gift or Advantage ("Checklist – Offering of Gifts and Advantages") can be found on the Intranet

Gifts & Advantages

Involvement in Business Activities

EBU Staff are entitled to be involved in personal and public activities outside the realm of their employment by the EBU, but only on the following conditions:

- the EBU's prior written consent needs to be obtained before Staff members take on or carry out any paid work external to the EBU.
- in undertaking any such activity, Staff members may not refer either directly or indirectly to their association with the EBU without the EBU's prior written consent.

In any case, Staff members may not:

- be involved with any broadcasting and/or production company, or provider of media-related services which engages in a business similar to any such activity undertaken by the EBU;
- become engaged in outside activities or have a business or financial interest that may be in competition with the EBU or could be regarded as creating a conflict of interest with their terms and conditions of employment.

5. Conflicts of Interest

Integrity	<p>EBU Staff members are required to avoid any conflict of interest. This implies carrying out their functions objectively and impartially, working to the best of their ability and avoiding situations where personal interests may enter into conflict, or appear to enter into conflict, with those of the EBU. All Staff involved in dealings with third-party suppliers (procurement) should exercise particular care.</p>
Definition of Conflict of Interest	<p>A "Conflict of interest" exists in situations where <i>Staff members give priority to their private and/or personal interests</i> or those of their relatives or friends or otherwise act in a manner which is potentially damaging to the interests of the EBU (even if Staff members do not actually promote, or intend to promote, their private and/or personal interests or those of a third-party).</p>
Non-exhaustive list of situations involving real or apparent conflicts of interest which are not permitted:	<ul style="list-style-type: none"> • A Staff member who has a financial or personal interest in a company with which the EBU conducts business and could be perceived to be in a position to influence relevant business decisions. • Activities for which employees are personally remunerated from an external source/party that involve, or might reasonably be perceived to involve, the EBU's name, facilities, equipment or Staff. • A Staff member with commitments, remunerated or otherwise, outside the EBU which lead to frequent or prolonged absences. • A Staff member who accepts gifts of value, grants or favours from persons or associates who could reasonably be perceived to benefit from such offers. • A Staff member involved in a tender procedure who has had, or has, a close personal or financial relationship with a person or organisation having submitted an offer for tender. • A Staff member who has an undisclosed personal, family or financial relationship with any current or prospective employee, consultant or supplier. • A Staff member who has a personal interest which conflicts with the interests of the EBU. • A financial interest of any kind which, in view of the circumstances, is so substantial that it would, or could reasonably be perceived to affect the judgement of an interested person or family member with respect to transactions to which the EBU is a party. • A conflict of interest may arise whenever Staff members (or a member of their family) receive improper personal benefits as a result of their position within the EBU.
Person to inform CFAO or Director General	<p>Any Staff members in doubt about whether a particular activity or set of circumstances could give rise to a conflict of interest should follow the internal channels of consultation described under Section 8 hereafter "Reporting Procedures". The party to whom the potential conflict is reported will be responsible for informing the Chief Financial and Administrative Officer ("CFAO") or, if the CFAO is conflicted, the Director General.</p> <p>The latter shall, after consultation with the relevant Director and Staff member, determine whether such conflict of interest does or might reasonably be considered to exist.</p> <p>If it does, appropriate action to eliminate the conflict of interest or a decision on how to proceed shall be taken by the Director General. If the conflict of interest concerns the Director General, the matter shall be referred by the CFAO to the Personnel Committee and/or the President of the EBU.</p>

6. Declaration of Personal Interests

Statement	<p>EBU Management and other Staff members involved in awarding contracts to third parties will be required to sign a "Declaration of Personal Interests" form, stating whether they or any of their relatives or close personal contacts hold any directorships, shareholdings or other financial interests which might give rise to a conflict of interest.</p> <p>They will remain responsible for filing such a declaration annually and for informing the Head of Human Resources whenever the Declaration needs to be updated.</p>
Filing	Declarations of Personal Interests are held by the Head of Human Resources.

7. Protection of Information

Confidentiality	<p>Staff members have a responsibility to protect the EBU's proprietary or confidential information, including, but not limited to, EBU governance, business and financial documentation and internal communications.</p> <p>Staff members should exercise the utmost discretion with regard to matters of official business and should not divulge confidential information without the authorisation of their Director or in the case of the members of the EBU Management Committee, the Director General.</p> <p>Staff members should not use to personal advantage any information which has not been made public and is known to them by virtue of their employment by the EBU. These obligations exist in perpetuity even after the Staff member has left the EBU, unless the EBU agrees otherwise.</p>
Media Relations	<p>Staff members are invited to refer to the Media Relations Policy for the procedures relating to the handling of the media.</p> <p>As a general rule, no Staff member is permitted to communicate with the media without the express authorisation of their respective Director. The Director General and the President are at all times entitled to address the media.</p>

8. Reporting Procedures

Internal channels of consultation	<p>Though depending on the issue at stake, the consultation process described hereafter should ideally be followed by Staff members with concerns about possible wrongdoing. If the case concerns:</p> <ul style="list-style-type: none"> • the Director General, Staff members should consult the Personnel Committee or the President of the EBU; • a Director, Staff members should consult the Director General or the Personnel Committee; • a manager, Staff members should consult their Director or the Director General;
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	<ul style="list-style-type: none"> • a Staff member without managerial responsibility, Staff members should consult their line manager or Director. <p>In any case, if the issue concerns:</p> <ul style="list-style-type: none"> • personnel matters, Staff members may always consult the Head of Human Resources; • suspicion of financial impropriety, Staff members may always consult the Internal Audit Manager or the CFAO; <p>In all such cases, the CFAO will be informed by the recipient of the complaint. The CFAO shall then take measures to ensure that the issue is resolved.</p> <p>In addition, with regard to any issue, Staff members may always contact directly the CFAO and thereafter, if necessary, the Director General. The CFAO and/or the Director General shall take appropriate action to resolve the issue. If the initial notification is to the CFAO, the latter shall notify the Director General or the President of the EBU.</p>
EBU Ombudsman	<p>Staff members may contact the EBU Ombudsman (the "Ombudsman") at any time, but they are encouraged to do so only after exploring the internal channels of consultation described above or if they consider that those channels are inappropriate for their particular case.</p> <p>The procedure is set out in the document entitled "Principles concerning the EBU Ombudsman", which can be consulted on the Intranet.</p>
Chairmen of the Audit or of the Personnel Committee	<p>In serious cases or if the case concerns the Director General or a Director, or if after following the internal procedure of consultation or contacting the Ombudsman, Staff members have not received a satisfactory answer or have received no answer at all, they may refer the matter in writing via an email link on the Intranet to:</p> <ul style="list-style-type: none"> • the Chairman of the Audit Committee (whose name will appear on the Intranet) in case of suspected fraud or other financial wrongdoing. • the Chairman of the Personnel Committee (whose name will appear on the Intranet) in case of suspected wrongdoing of a non-financial nature. <p>Upon receiving such notification, the relevant Chairman will confidentially notify the Director General and the Internal Audit Manager.</p> <p>If the matter relates to alleged conduct by the Director General, the relevant Chairman will, in the first instance, confidentially notify the President of the EBU or, in his absence, the Vice-President as well as the Internal Audit Manager.</p> <p>Staff members making allegations to either of the Committees must identify themselves. If following review, the Committee believes that the allegation may have merit, the person against whom the allegation is made will be notified and provided with details of the allegation(s), (but not the name of the Staff member who raised the issue if the Staff member requests this to be withheld) and be given an opportunity to refute the allegation.</p>
Protection	<p>A Staff member submitting such a report in good faith has the right to protection against reprisals or sanctions, and the EBU will take all reasonable steps to protect Staff members from retaliation.</p>

9. Sanctions

Breach/fraud	<p>A breach of this Code shall for the present purposes also include a fraud or a breach of the EBU's rules and policies.</p> <p>Any type of fraud is a criminal offence, and any case where fraud has been committed, or is suspected of having been committed, will be pursued in accordance with appropriate procedures.</p>
Breach by a Staff member	<p>In case of breach of the Code by a Staff member, the Director General will be responsible for deciding on any sanction, in consultation, where appropriate with the Chairman of the Audit Committee and/or the Chairman of the Personnel Committee.</p> <p>Where wrongdoing has been proven in the particular case of referrals made in accordance with Section 8 above, sanctions will be imposed as a matter of course. These will be recommended by the Head of Human Resources and approved by the Director General after consultation with the Chairman of the Audit Committee and/or the Chairman of the Personnel Committee as appropriate.</p> <p>Allegations made in bad faith with the intention of causing harm will result in disciplinary measures (which, depending on the gravity of the allegation, may include dismissal). Dishonest statements made within the EBU or to organisations or individuals outside the EBU are strictly prohibited. For these purposes, "dishonest" means intentionally inaccurate, misleading or careless.</p>
Breach by the Director General	<p>In the case of a breach of the Code by the Director General, the President and the Vice-President of the EBU will consult each other and will seek, if appropriate, the opinion of the Chairman of the Audit Committee and the Chairman of the Personnel Committee regarding the appropriate sanctions. They will then submit a recommendation to the Executive Board.</p>
Sanctions	<p>Any breach of this Code by Staff members may expose them to disciplinary action, depending on the gravity of the conduct.</p> <p>The sanctions are defined in accordance with Swiss law and by the Staff Regulations in force.</p>

10. Application of the Code

<p>Implementation of and Compliance with the Code</p>	<p>Any questions relating to the interpretation or scope of the present Code should be referred in the first instance to the Internal Audit Manager. Any necessary alignment of the Code to conform to local laws will be referred by the Internal Audit Manager to the Legal Department.</p> <p>As the guarantor of the Permanent Services' ethical values set out herein, the Director General will be responsible on a managerial level for ensuring compliance with codes of conduct governing financial control mechanisms, business conduct, human resources and standards of personal behaviour, and in particular, compliance with this Code of Ethics.</p> <p>The Audit Committee and Personnel Committee will share responsibility for overseeing the implementation and enforcement of this Code, and the respective Chairmen of the two Committees will make regular joint reports to the Executive Board on its overall effectiveness and on any reported cases of breach of the Code and any action taken as a result.</p>
<p>Keeping the Code relevant</p>	<p>This Code will be subject to periodic review by the Audit Committee and Personnel Committee to ensure compliance with applicable law and conformity with corporate practice. To this end, the Code may be subject to further amendment and/or modifications by the Audit Committee and Personnel Committee, acting jointly.</p>
<p>Reports to the Committees</p>	<p>The Audit Committee and the Personnel Committee will receive at least annually a report on any complaints under the Ethics Code and any action taken as a result.</p>

Checklist - Offering of Gifts & Advantages

Principles:

- The EBU does not tolerate any form of corruption.
- We do not offer any form of advantage to third parties, whether directly or intended for other third parties (e.g. family members or other employees of the same organisation)

Rules regarding the Offering of Gifts & Advantages

In principle the usual attentions given during working sessions taking place at the EBU premises to representatives of EBU Members or of other organisations with whom the EBU maintains or intends to establish commercial relations (e.g. refreshments, pens, meals in the staff restaurant) as well as insignificant publicity items (e.g. pens, blocs of paper, caps, t-shirts etc.) can be offered without hesitation.

All other gifts and advantages, such as an invitation for an aperitif or a dinner, bottles of wine, boxes of chocolates etc., may only be offered if the donor can answer "NO" to all of the following questions:

	Question	YES	NO
1	Is the value of the gift/advantage offered higher than CHF 200 (including in the case of an invitation to an event sponsored entirely or in part by the EBU or for which the EBU has been engaged as a commercial service provider)?		
2	Has the beneficiary already received this year a gift/advantage from the EBU?		
3	Does the gift/advantage reflect any objective other than maintaining good relations?		
4	Is the capacity of the beneficiary to take objective and correct decisions compromised? Could he/she have the feeling that this situation would reflect a lack of ethics? Has consideration been given to how the offering of such a gift/advantage would be perceived by other third parties (e.g. EBU Member representatives, media professionals, colleagues)?		
5	Has the gift/advantage been offered at a delicate moment in our commercial relations?		
6	Does the gift/advantage consist in part of expenses (travel, lodging) or cash (aside from normal tips)?		

Note:

Deviations are only permitted if approved by the Director General.

Checklist - Acceptance of Gifts & Advantages

Principles:

- The EBU does not tolerate any form of corruption.
- We do not accept any form of advantage from third parties, whether personal or intended for other third parties (e.g. family members or other employees of the EBU)

Rules regarding the Acceptance of Gifts & Advantages

In principle the usual attentions given to EBU employees participating in working sessions at the premises of EBU Members or other organisation with whom the EBU maintains or intends to establish commercial relations (e.g. refreshments, pens, meals in the staff restaurant) as well as insignificant publicity items (e.g. pens, blocs of paper, caps, t-shirts etc.) can be accepted without hesitation.

All other gifts and advantages, such as an invitation for an aperitif or a dinner, bottles of wine, boxes of chocolates etc., may only be accepted if the recipient can answer "NO" to all of the following questions:

	Question	YES	NO
1	Is the value of the gift/advantage higher than CHF 200?		
2	Have I already received this year a gift/advantage from the same person/company/organisation?		
3	Does the gift/advantage reflect any objective other than maintaining good relations?		
4	Is my capacity to take objective and correct decisions compromised? Do I have the feeling that this situation reflects a lack of ethics on my part?		
5	Has the gift/advantage been offered at a delicate moment in our commercial relations		
6	Does the gift/advantage consist in part of expenses (travel, lodging) or cash (aside from normal tips)?		

Note:

Gifts that are not permitted must be returned to their donor. If this is not possible, in agreement with that person's immediate supervisor, the gift will be handed over to the Human Resources Unit and its further disposition will be determined by the EBU Management Committee.