

EIT CULTURE & CREATIVITY

Code of Conduct

September 2024





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1. Introduction

The EIT Culture & Creativity Code of Conduct establishes the standards for ethical behaviour and conflict of interest management for all involved parties. This Code ensures that all activities are conducted with integrity, transparency, and in compliance with applicable laws. It reflects our commitment to fostering an ethical, inclusive, and professional environment.

2. Purpose

The purpose of this Code is to define the ethical principles and standards of conduct that govern the actions and decisions of all individuals and organizations associated with EIT Culture & Creativity. This includes employees, partners, members, external collaborators, experts, and consultants. The Code aims to guide our behaviour to ensure we maintain the highest standards of integrity and accountability.

3. General Principles

The following general principles shall govern all EIT Culture & Creativity activities:

3.1 Integrity and Honesty

All actions must be guided by integrity, honesty, and transparency. We are committed to ethical behaviour in all interactions, ensuring that our conduct is beyond reproach.

3.2. Compliance

Adherence to all relevant legal regulations and internal policies is mandatory. This includes local, national, and international laws as well as internal guidelines.

3.3. Respect, Diversity, and Inclusion

We value contributions and diversity, show respect for all individuals and stakeholders, ensure equal opportunities, leverage diverse perspectives and approaches, and promote sectoral, geographical, and organizational diversity.



3.4. Teamwork

Collaboration is key to achieving our common goals. We work together, support each other, and strive for high levels of performance.

3.5. Innovation

We encourage innovative approaches to deliver greater value to our stakeholders. This includes doing things better or differently to improve processes and systems.

3.6. Quality and Excellence

Striving for high standards in all activities is fundamental. We aim to exceed expectations and hold ourselves and others accountable for achieving excellence.

3.7. Confidentiality

Protecting confidential information and avoiding conflicts of interest is critical. Information should only be accessed and used for authorized purposes.

3.8 UN Sustainable Development Goals and UN Global Compact

We support the UN Sustainable Development Goals (UN SDGs)* and integrate the Ten Principles of the UN Global Compact into our strategies, policies, and procedures, derived from the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

4. Application

This Code applies to all direct members of EIT Culture & Creativity, including employees, partners, members, external collaborators, experts, and consultants. It sets out the standards of conduct for interactions with staff, partners, public authorities, and civil society. The Code is enforceable and mandatory for all involved parties.

*Available at UN website <https://www.unglobalcompact.org/what-is-gc/mission/principles>



5. Standards of conduct

Impartiality & Independency

When making decisions, all involved parties must act impartially and independently, avoiding any preferential treatment or conflicts of interest. Personal, company, or special interests should not influence decisions.

Objectivity

Decisions should be based on relevant factors and give proper weight to each. Irrelevant elements should be excluded from consideration.

Information

Involved parties must provide accurate and complete information in a timely manner, respecting confidentiality provisions. Misuse of confidential information for personal gain is prohibited.

Transparency & Accountability

Actions must be transparent, and the reasons for decisions should be justifiable. Involved parties should be prepared to explain their actions unless doing so would breach confidentiality or harm the organization.

Lawfulness

Compliance with laws and internal regulations is required. This includes privacy and information security laws.

Non-discrimination

Equal treatment for all individuals, regardless of nationality, gender, racial or ethnic origin, religion, disability, age, residence, or sexual orientation. Discrimination of any form is unacceptable.

No Improper Advantage

Bribery, fraud, and other means of obtaining undue or improper advantage are strictly prohibited. Any such acts must be reported immediately.



Professionalism and Fairness

Conduct should maintain the integrity and public confidence in EIT Culture & Creativity. Professionalism, fairness, and good faith must guide all actions.

6. Conflict of interests

All parties must strive to avoid conflicts of interest between their personal interests and those of EIT Culture & Creativity. This includes avoiding situations where personal, professional, or financial interests could influence their decisions or actions.

Identification

Any potential conflicts of interest should be identified and disclosed immediately.

Management

Procedures are in place to manage conflicts of interest to ensure that they do not compromise the integrity of our decision-making processes.

Conflict of Interest Procedure

Annex I of this Code outlines the Conflict-of-Interest Procedure that all EIT Culture & Creativity staff and Supervisory Board members must follow.

7. Responsibilities

Employees

Promote a work environment that respects personal development and private life. Avoid any activities that could harm the organization or create conflicts of interest.

Selection Process

Recruitment and selection processes must be fair and transparent, adhering to the principles of equal opportunities and diversity. Nepotism and favouritism are strictly prohibited.



Partnerships

Engage with partners based on principles of openness, transparency, lawfulness, and mutual respect. Ensure that all interactions are conducted professionally and ethically.

8. Non-Compliance

Non-compliance with this Code should be reported through the appropriate channels. Reports can be made to the CEO or the Chairperson of the Supervisory Board. An ethical channel will be established in 2024 to facilitate these reports.

Reporting

Reports include breaches of the Code, requests for interpretation, or notifications of conflicts of interest.

Consequences

Noncompliance may result in disciplinary actions, including termination of contracts or partnerships.

9. Code Distribution and Training

The Code and its annex on Conflict of Interest will be distributed to all involved parties and made available on the EIT Culture & Creativity intranet starting in 2024. An annual training plan will be implemented to ensure that all parties understand and comply with the Code.

Regular training sessions will be held to explain the principles and standards of the Code.

Acknowledgment

All parties must acknowledge receipt and understanding of the Code and commit to abiding by its principles.



10. Conclusion

The EIT Culture & Creativity Code of Conduct is a fundamental component of our commitment to ethical behaviour, transparency, and accountability. It ensures that all actions contribute to the organization's vision, mission and values, fostering a trustworthy and professional environment.

I have received a copy of this current Code of Good Conduct and its Annex I of this Code (Conflict of Interest).

I have read, understand, and agree with them and I will abide by them.

Name and signature:

Date:



Annex I: Conflict of Interest

The Conflict-of-Interest Procedure of EIT Culture & Creativity governs the disclosure, management, and, if possible, avoidance of conflicts of interest within the organization. This procedure complies with and applies in addition to the requirements of the Articles of Association, internal By-Laws, and other governing documents, as well as applicable laws. Definitions in capital letters follow the definitions provided in the Code of Conduct.

Purpose

The purpose of this procedure is to protect the integrity of the decision-making process within EIT Culture & Creativity, to enable stakeholders to have confidence in the integrity of the organization, and to protect the reputation of the Supervisory Board and staff members.

Scope

This procedure applies to all EIT Culture & Creativity staff and Supervisory Board members, including any individual or legal entity with a potential source of interest. All parties must strive to avoid any conflict of interest between their personal, professional, or business interests and those of EIT Culture & Creativity. This includes avoiding both actual conflicts of interest and the perception of such conflicts.

Definition of Conflict of Interest

A conflict of interest occurs when the impartiality and objectivity of a decision, opinion, or recommendation by an obligated person is, or could be perceived to be, compromised by the existence of a source of conflict of interest. This arises when an obligated person has a personal, professional, or business interest that may interfere with the exercise of their duties or responsibilities. Essentially, a conflict of interest arises whenever activities and relationships interfere, or appear to interfere, with one's ability to act in the best interest of EIT Culture & Creativity.

Examples of Conflicts of Interest

- A Supervisory Board member employed by a core partner may face decisions regarding funding for that partner.
- A Supervisory Board or Management Team member related to a member of EIT Culture & Creativity may face decisions on remuneration.
- An involved party holding shares or other interests in an entity that may receive grants or contracts from EIT Culture & Creativity.
- An involved party engaging in professional activities similar to those they provide for EIT Culture & Creativity, potentially interfering with the organization's interests.



- An involved party participating in the governing bodies of entities with interests that conflict with EIT Culture & Creativity.
- An involved party accepting bribes or gifts from individuals or companies seeking a business relationship with EIT Culture & Creativity.
- An involved party using confidential information from EIT Culture & Creativity for personal benefit.
- An involved party hiring relatives or friends without adhering to the approved recruitment policies.
- An involved party making personal investments on behalf of EIT Culture & Creativity.
- An involved party using work time for unrelated activities.
- An involved party benefiting directly or indirectly from accepted proposals or business plans.
- An involved party benefiting personally when exercising their responsibilities.

Sources of Conflict of Interest

Economic Interests

Substantial financial interests, including stocks, shares, equity, bonds, or partnership interests.

Membership in Managing Bodies

Participation in decision-making bodies of public or private entities with potential interests in EIT Culture & Creativity activities.

Membership in Advisory Bodies

Participation in advisory bodies with influence on outputs related to EIT Culture & Creativity activities.

Strategic Advisory Roles

Past or present participation in advisory boards influencing the strategy or activities related to EIT Culture & Creativity.



Consultancy/Advice

Providing paid or unpaid advice or services in relevant fields.

Employment

Regular, occasional, or ad hoc employment in fields related to EIT Culture & Creativity's scope of action.

Intellectual Property Rights

Ownership of rights resulting from intellectual creativity that may lead to financial gain.

Beneficiary of Funding

Participation as a beneficiary or potential beneficiary of EIT Culture & Creativity funds.

Family relations

When e.g. a wife, husband or child of member of the staff of the Supervisory Board, is potentially profiting from decisions of the EIT Culture & Creativity.

Other Memberships or Affiliations

Relevant memberships or affiliations not covered by the above definitions but impacting EIT Culture & Creativity's activities.

Communication process

- **Supervisory Board Members**

Must inform the Chair of the Supervisory Board immediately. If the Chair is involved, the oldest member of the Supervisory Board must be informed.

- **Other Staff Members:**

Must refrain from actions affected by the conflict and inform the CEO immediately. If the CEO is involved, the Chair of the Supervisory Board must be informed.

Screening Criteria

The responsible person (Chair of the Supervisory Board, the oldest member of the Supervisory Board different from the Chairperson or the CEO) will evaluate potential conflicts based on their compatibility with EIT Culture & Creativity's interests and the context of the situation.



This decision shall be made without undue delay and will be based on the following criteria:

- Assess whether the disclosed source of conflict or potential conflict is compatible with EIT Culture & Creativity's activities and interests.
- Consider the context of the communication, including the meeting agenda items and the role and responsibilities of the person involved.

Abstention from Actions

The Obligated Person shall refrain from any actions that could be affected by the conflict of interest until a decision is communicated. If the potential conflict of interest concerns the general activities of the Obligated Person as a member of EIT Culture & Creativity, the person must cease all related activities and may have their functions suspended until a decision is made.

If the conflict of interest pertains to a specific matter, the Obligated Person must withdraw from the relevant part of the meeting. If the Obligated Person is a Supervisory Board member, they will not vote on the matter and will not be counted for quorum purposes.

All disclosures and subsequent actions will be recorded in the minutes of the Supervisory Board or the respective governance body of the EIT Culture & Creativity.

Adoption of the Decision

The responsible person may request necessary documentation and will make a timely decision to prevent harm to the organization. Restrictions may include withdrawing the involved person from related work or decisions.

Ex-post treatment of Noncompliance

If any party involved with EIT Culture & Creativity becomes aware of inconsistent or missing information in an Obligated Person's declaration, and a preliminary assessment indicates a potential conflict of interest, the Person in Charge will request clarification from the Obligated Person within seven calendar days. The Obligated Person must provide the rationale for the missing information and complete the declaration if applicable.

If the Obligated Person fails to provide the necessary information within the specified time, the Person in Charge may take preventive actions regarding the person's participation in EIT Culture & Creativity activities. An internal assessment, possibly involving external counsel, may be conducted to determine the existence of a conflict of interest. The Obligated Person will have the opportunity to explain their case. If it is determined that the Obligated Person did not comply with their obligations, whether intentionally or negligently, appropriate measures or actions will be taken in accordance with the applicable rules.