

GC Code of Ethics

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Introduction

The Global Campus of Human Rights (hereinafter Global Campus or GC) is an international not-for-profit university association aimed at the promotion of democracy and the protection of human rights on a global scale. The Global Campus organises educational, training, promotional and research programmes that contribute to the development of policies which encourage respect of human rights, democracy and good governance.

The network is formed by eight regional hubs, based in Venice (for Europe), Sarajevo/Bologna (for South East Europe), Pretoria (for Africa), Bangkok (for Asia-Pacific), Yerevan (for the Caucasus), Buenos Aires (for Latin America and the Caribbean), Beirut (for the Arab World) and Bishkek (for Central Asia) – each offering a Master's Programme in Human Rights and Democratisation and/or Sustainability – and consists of more than 100 leading universities.

Coordination is provided through its Headquarters based in Venice (hereinafter GCHQ) – seated in Venice-Lido at the Monastery of San Nicolò, Riviera San Nicolò, 26. As Italian registered association it belongs to the “Third Sector Entities” identified by the Legislative Decree of 3 July 2017 n. 117. It is accordingly registered in the Regional Office of RUNTS (Not-for-Profit Italian National Register) of the Veneto Region with registration number rep. n. 40196; C.F. 94054110278 in section “g - Other entities of the Not-For-Profit Sector”.

Statement of Purpose

The **general purpose** of the present Code of Ethics is to define, clarify and share the recognised, accepted and shared values, and the rights, duties and responsibilities of the Global Campus toward its community and the parties with whom the association works to achieve its mission. The Code of Ethics also defines rights and responsibilities of employees and representatives of the GC, who are acting in the name of the association.

The **specific purpose** of the present Code of Ethics is to form an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter the Model).

The GC's legal predecessor, the European Inter-University Centre for Human Rights and Democratisation (EIUC), has adopted this Model in 2018 with a view to guaranteeing the respect of the Italian Legislative Decree 231/2001, which introduced an independent system of administrative liability for legal entities that supplements the criminal liability of individuals who are the physical perpetrators of specific crimes (e.g. corruption-related crimes, frauds against the state, IT crimes, crimes on safety at the workplace and labour-law related crimes, money laundering, environmental crimes, crimes related to exploitation of illegal immigration).

The present Code of Ethics is part of a broader regulatory system including the GC Code of Conduct which identifies, more specifically, the conduct and behaviours required by the GC to maintain a welcoming, respectful and safe working and learning environment for its community of staff, students, visiting professors and lecturers, guests, and external collaborators. The Code of Conduct

further includes a safeguarding and integrity system to prevent sexual exploitation, sexual abuse, and sexual harassment (SEAH), as detailed in the GC Safeguarding and Integrity System.

The present Code of Ethics includes six sections, respectively addressing:

- 1) Code's Jurisdiction / Recipients
- 2) Core Values
- 3) General Principles
- 4) Stakeholder Relationships
- 5) Other Prescribed Conduct
- 6) Code Violations and Allegations of Misconduct

1. Code's Jurisdiction / Recipients

The present Code of Ethics applies to all the GC's activities taking place at its Headquarters in Venice (GCHQ) or directly managed by GCHQ.

Core values and general principles are common to the whole organisation; however, due to the decentralised nature of the Global Campus, actual enforcement of the Code of Ethics can only apply to activities developed at and by the GCHQ and to GC Europe activities taking place in Venice, Italy. The activities taking place at the Regional Hubs and run by the coordinating universities in the additional 7 world regions (GC South East Europe, GC Africa, GC Asia-Pacific, GC Caucasus, GC Latin America and the Caribbean, GC Arab World, GC Central Asia) will be subject to the Ethical Codes and Codes of Conduct in place at these universities, and fall under their jurisdiction.

Recipients of the ethical principles provided by the present Code (hereinafter the "Recipients") are:

- The GC community comprising of staff, students, visiting professors and lecturers, guests and external collaborators;
- The GC member university representatives (members of the GC Assembly) as identified by the GC Statute;
- The President, Secretary General, GC Council members, Advisory and Supervisory Bodies as identified by the GC Statute;
- All other stakeholders who operate in the name of and/or on behalf of the Global Campus without exception.

The value and importance of the present Code of Ethics are reinforced by the specific responsibilities of entities if they commit criminal or administrative offences as described under Legislative Decree 231/2001.

2. Core Values

The Global Campus expects from all members of its community a personal commitment and adherence to the values enshrined in international human rights law. These values include:

- Mutual respect as the fundamental basis of all interactions within our community of staff, students, visiting professors and lecturers, guests and external collaborators;
- Team spirit and collaboration;
- Fairness, equity, and equal treatment;
- Tolerance and non-discrimination;
- Diversity and inclusion;
- Respect for human dignity, privacy and personal integrity;

- Freedom of expression;
- Transparency in the management of resources and funds;
- Academic honesty and academic freedom;
- Compliance with law and regulations (national and international).

3. General Principles

Transparency

The GC expects all recipients to make responsible and accountable use of the information, equipment, money and resources with which they work and to which they have access.

Information provided internally and to third parties must be accurate and decisions must comply with the standards of transparency and traceability. All stakeholders must adopt the necessary measures to ensure the accuracy and transparency of information and decisions.

A decision is considered to be transparent when it meets the following requirements:

- It was taken with the approval of an appropriate level of management;
- It is based on a rational analysis of potential risks and benefits involved;
- The reasoning for the decision and its development can be traced.

Conflict of Interest and Duty of Loyalty

Conflicts of interest must be disclosed.

A real or potential conflict of interest exists when the relationship between a stakeholder and a third party could be detrimental to the interests and reputation of the GC, to fairness and impartiality, and to the transparency of decisions. Any situations giving rise to potential conflicts of interest must be made known to the Secretary General and Finance Manager (where it concerns suppliers), to the Secretary General and Administrative and Human Resources Director (in the event of a conflict that emerges in connection with administrative matters or in procedures for the selection of personnel), and to the Secretary General, Academic Director and Director/Manager of the given educational programme (in the event of a conflict emerging between faculty and students).

Health and Safety

The GC promotes calm and stable working conditions based on the quality of relationships by taking care of the health and safety of the working and educational environment and establishing procedures, working methods and operating instructions aimed at making the GC community aware of risks and the related preventive measures.

The GC avoids behaviour that could put people's health and safety at risk by complying with the identified procedures and collaborating on safety information and training activities.

The GC pursues the implementation of the following fundamental principles (established by Italian Legislative Decree 81/2008):

- Avoid risks;
- Evaluate the risks that cannot be avoided;
- Combat risks at the source;
- Adapt work to people, in particular as regards the design of jobs and the choice of equipment and work and work methods;

- Take into account the degree of evolution of processes and methods;
- Replace what is dangerous with what is not or less dangerous;
- Give priority to collective protection measures over individual protection measures.

The GC undertakes to consolidate and disseminate a safety-oriented culture among all its employees, collaborators and suppliers, adopting measures for responsible behaviour, according to procedures and protocols outlined in line with general standards on the subject.

Environment

The GC operates according to the principles of sustainability, in full compliance with the applicable regulatory provisions, and in line with the GC Environmental Policy.

The GC constantly monitors the environmental implications underlying its activities, intervening promptly if organisational changes could give rise to the need for new regulatory requirements.

4. Stakeholder Relationships

Relations with Suppliers

The Global Campus manages the process of the acquisition of goods and services on the basis of principles of openness and fairness. Openness and fairness in relations with suppliers are ensured as follows:

- Rules and mechanisms for the selection and management of suppliers are followed which take into account the extent of their technical, economic and financial reliability and the level of their social responsibility;
- Uniform methods for the management of suppliers are instituted so that all suppliers have equal opportunities;
- Monitoring criteria and systems are instituted and applied for constant control over the quality of the services provided and the goods supplied.

The recipients of the present Code shall not pay gifts, donations or other benefits to personnel working for third parties (in particular suppliers).

All contractors will be asked to comply also with the GC Code of Conduct, which forms part of the same GCHQ regulatory system.

Relations with Business Partners (Professionals, Consultants and Partners)

The GC identifies and selects its business partners (professionals, consultants, project partners and partners who use the GC brand) with impartiality, autonomy and independence of assessment.

In its relations with business partners, the GC will have to:

- Carefully assess whether it should use the services of business partners and select them on the basis of adequate professional and reputational qualifications;
- Give reasons for their choice;
- Establish efficient, transparent and collaborative relationships, maintaining open-ended and frank dialogue, obtain the cooperation of professionals, consultants, and partners to constantly ensure the most cost-effective ratio between service quality and financial cost;
- Apply the contractually provided terms;
- Operate in accordance with prevailing law and require due compliance with the law.

Relations with Public Institutions, Public Officials and Private Parties

Relations with public institutions, public officials and private parties and organisations must be based on the observance of the applicable laws and regulations. They must be informed by maximum transparency, fairness and integrity, avoiding behaviour that could give the impression of wishing to unduly influence the decisions of the counterpart or demanding preferential treatment.

To that end, the Global Campus undertakes to:

- Operate, without any type of discrimination, through communication channels designated for the purpose with public institutions at local, national, or international level;
- Represent the interests and positions of the GC transparently, precisely and consistently and avoid any collusive type of behaviour.

The relations with the above-mentioned parties are limited to the designated and authorised departments, in accordance with the law and regulations, and may not compromise the integrity or reputation of the Global Campus in any way.

During administrative procedures and other relations with public institutions, the recipients of the present Code will not behave, directly or indirectly, in such a way as to incorrectly influence the decision of the counterpart. This comprises a prohibition to propose employment and/or commercial opportunities to the interlocutor.

Any illicit initiative coming from the aforementioned subjects and aimed at soliciting, even with indirect or biased phrases, the undue donation of money or other benefits must be categorically rejected.

Any form of gift to public officials is not allowed. The GC does not provide contributions, advantages or other benefits to political parties, workers' trade union organisations, or their representatives.

Relations with Potential Donors and Supervisory Bodies

In the framework of its relations with local, national and international public institutions as well as with supervisory authorities, the GC commits to ensure that no untruthful applications or requests are submitted in order to obtain public funds, grants, concessionary loans, scholarships, authorisations or administrative licences.

Similarly, when the GC takes part in public tender procedures, its stakeholders must act in full compliance with the law and fair business practice, especially refraining from conduct which might lead authorities to act improperly in its favour. The GC must verify that the public funds, grants or loans given are actually used to carry out the activities or projects for which they are intended.

The GC follows similar principles in its relations with internal supervisory bodies such as its Supervisory Body (Statutory auditing body), and the Surveillance Body appointed in accordance with Legislative Decree 231/2001.

Relations with Judicial Authorities

With regard to any requests of any nature from judicial authorities, and in general all contacts with them, the GC commits to ensure maximum cooperation and make truthful statements that reflect the facts, and not behave in a way that could impede absolute compliance with the law and the principles of loyalty, fairness and transparency.

In the event of investigations, inspections or inquiries, all existing documents are put at the judicial authorities' disposal; it is prohibited to destroy or alter records, reports, entries or any other type of document and to issue false or partial declarations or induce others to do so.

The following is forbidden:

- Carry out any activity that could encourage or damage one of the parties during legal proceedings;
- Influence the will of parties who have to answer to the legal authorities in any form to persuade them not to make declarations or state facts that are untrue;
- Promise or offer money, gifts or other benefits to parties involved in legal proceedings or to persons who are close to them.

Relations with Staff

The GC promotes equal opportunities, does not permit discrimination, and encourages relations which are informed by the principles of fairness and honesty.

Relations between the staff, regardless of levels of responsibility, will be based on fairness and honesty, subject to the respective roles and responsibilities. The managers will exercise the powers related to their position in a fair and balanced manner, fostering the professional wellbeing of their colleagues. Each employee will work on a collaborative basis, doing their jobs with responsibility, efficiency and diligence, and in accordance with the values of the GC.

The selection and hiring of staff will be carried out in compliance with criteria of transparency in the assessment of the skills and professional competence requirements, capacity and individual potential.

Staff must be hired on the basis of valid work contracts, and no type of work that does not comply or is not in line with prevailing law is permitted. The GC may not employ workers who do not have valid permits to stay in accordance with laws and norms preventing illegal labour exploitation.

The GC promotes training initiatives to increase the professional competences of its staff to the advantage of the whole community. It adopts evaluation procedures aiming to promote the improvement of organisational and individual performance.

In accordance with its awareness of the value of trade unions and their representatives, the GC respects dialogue between its workers and trade union representatives, and cooperates in order to contribute towards the wellbeing of its workers, making itself available as a platform for concerted action between involved parties.

Relations between GC Organs

The members of the GC Council, the Secretary General and any other organs of the GC are required to maintain transparent conduct that formally and substantially complies with applicable legislation and the GC Statute.

The members of the GC Council and the Secretary General pursue the interests of the GC, abstaining in the presence of conflicts of interest. It is always forbidden to use a position within the GC to direct its activities towards the pursuit of interests of third parties, to the detriment of the pursuit of the purposes and interests of the GC itself.

The GC pursues the most correct and transparent keeping of company books and records and ensures the correct and timely minutes of the resolutions of the GC Council. The GC makes promptly available to the Supervisory Body provided by the Statute and to the Surveillance Body appointed in

compliance with Italian Legislative Decree 231/01 any information requested to carry out their functions.

5. Other Prescribed Conduct

Accounting and Internal Controls

The GC believes that accounting transparency and keeping accounting records in accordance with the principles of truth, completeness, clarity, precision, accuracy and in compliance with prevailing law is of fundamental importance for effective control and proper institutional communication, and acts in accordance with this.

All documentation supporting each transaction must be kept so that the accounts can be recorded easily, the transaction can be reconstructed and any responsibility can be identified.

The accounting will be based on generally accepted accounting standards (making in particular reference to applicable EU regulations) and will record the most important decisions related to the management of the GC.

The administrative accounting documentation must be easily retrievable and filed in accordance with suitable standards that can be easily consulted by both the internal and external parties authorised to audit the accounts.

The GC complies with prevailing law on tax matters in Italy and the foreign countries it operates in, and undertakes to promptly give the financial authorities all information required by law in accordance with the deadlines in order to ensure the correct calculation of taxes.

Anti-Money Laundering

The GC exercises its activities in full compliance with prevailing anti-money laundering laws and the provisions issued by the applicable authorities, and undertakes not to carry out suspicious activity under the profile of fairness and transparency.

Additionally, money, goods or other benefits may not be purchased, replaced or transferred if there is awareness that they have a criminal provenance, and other transactions may not be carried out that would prevent the identification of their criminal provenance.

Data Protection, Protection of Privacy, and Confidentiality

The GC ensures that personal and sensitive data collected for the purposes of carrying out its functions are processed, communicated and disseminated in accordance with domestic legislation (Legislative Decree 196/03) and European legislation on the protection of privacy (EU regulation no. 679/2016 - GDPR). The GC will take all necessary measures to keep and safeguard personal and sensitive data in accordance with the mentioned provisions.

Non-compliance with the obligation of confidentiality will constitute a serious breach if it implies, by any means, a disclosure of or the opportunity for the dissemination of information relating to sensitive personal matters (e.g. health-related data).

Management of Confidential Information

All GC stakeholders who become aware of confidential information in the exercise of their duties will have to keep it confidential.

The GC protects all confidential information which emerges during the exercise of its duties. In addition, its staff or partners may not obtain, by using dishonest or improper means, confidential information regarding companies, suppliers, organisations or partners or information held by them.

Use of Information Systems

The GC uses the ICT systems assigned exclusively to perform its activities, in full compliance with laws governing the use and management of information systems and defined company procedures.

ICT resources or web resources may never be used for purposes that breach the law, public order or public morality, or that involve racial intolerance, the incitement to violence or the violation of human rights, or to commit or induce the commission of offences, to damage or alter information systems or public or private information on third parties, or to illegally obtain confidential information.

In addition, no staff may install software without a license on the GC's computers, or use and/or copy documents or materials protected by copyright (audio-visual, electronic, paper or photographic recordings or reproductions) without the express authorisation of the holder.

No illegal downloads may be carried out, and content protected by copyright law may not be sent to third parties.

Intellectual Property and Plagiarism

All GC stakeholders are required to comply with rules on intellectual property and plagiarism. Authors of an intellectual work belonging to the GC must not make use of it for private means, comply with the confidentiality of results until official dissemination and cooperate with the GC to manage the results in the public interest.

The GC, considering the social relevance of scientific research, is committed to ensuring maximum sharing and circulation of the results of its research. For this purpose, without prejudice to the intellectual property rights of the authors, the GC supports – mostly through the tool of its Open Knowledge Repository – access to literature and research products, in order to allow the exact identification of the contents and to safeguard their integrity. Intellectual property is in the GC's favour within a mutual relationship that includes sharing objectives on the use of research results.

No form of plagiarism is admissible. Plagiarism is defined as the partial or total attribution to oneself or to another author of other persons' words, ideas, research or discoveries, regardless of the language in which these are officially presented or divulged, or not quoting their sources. Plagiarism may be deliberate or the result of carelessness.

6. Code Violations and Allegations of Misconduct

The present Code of Ethics provides for the right and the duty to report alleged violations. Any breach of the present Code is unacceptable and may be subject to disciplinary sanctions or reporting to judicial authorities if the breach entails a criminal liability. Disciplinary sanctions may also be applied in case of malicious or grossly negligent reports.

The GC Surveillance Body is in charge of monitoring the performance and compliance of the present Code. It has independent powers of initiative and control and is appointed in accordance with the provisions of Legislative Decree 321/2001.

Subject to compliance with all the protections set out under the law and collective contracts in effect, and subject to legal obligations, the GC Surveillance Body is authorised to receive requests for clarifications, complaints or reports of potential or current breaches of the present Code by all the recipients mentioned in section 1.

Allegations can be made, both in written and oral form, through the **Whistleblowing Platform** adopted by the GC:

<https://areariservata.mygovernance.it/#!/WB/GLOBAL-CAMPUS-OF-HUMAN-RIGHTS>

It guarantees absolute confidentiality and encryption of the whistleblower and the report, known exclusively to the recipient, which is the Surveillance Body in his function of independent 'Whistleblowing Officer'. The whistleblower can also ask to be heard personally.

When reports are received, the Surveillance Body will take the necessary action to assess its merits and investigate the case, in compliance with the GC Whistleblowing Procedure. Whistleblowers are protected against any form of retaliation, discrimination, or penalisation.