



Transparency International Belgium's Ethics Infrastructure and Anti-harassment Policy (The "Policy")

This Policy is approved by the Board of Directors of Transparency International Belgium ("TI Belgium") on 07 September 2021.

TI Belgium's members, interns, volunteers and consultants are committed to uphold high standards of integrity and accountability and to promote these standards and principles.

Objective

TI Belgium strives to create an environment in which people are treated with dignity, decency and respect. The environment of TI Belgium should be characterized by mutual trust and absence of intimidation and oppression. Communication and consultation with each other should be openly and collegially and in a manner that assists each of the members, interns, volunteers and consultants to fulfil their duties and responsibilities faithfully and efficiently. TI Belgium requires integrity and fair practices in all aspects of its activities and TI Belgium expects the same standards to be applied by those with whom we have a professional relationship. TI Belgium will not tolerate unlawful discrimination or harassment of any kind. Through the enforcement of this policy, TI Belgium will seek to prevent, correct and discipline behaviour that violates this policy.

All members, interns, volunteers and consultants are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate action will be taken against any member, intern, volunteer or consultant who violates this policy. Based on the seriousness of the offense, this action may include verbal or written reprimand, suspension or exclusion.

Any member, intern, volunteer or consultant who knowingly allows or tolerates unethical behaviour, discrimination, harassment or retaliation, including the failure to immediately report such misconduct, is in violation of this policy and subject to discipline.

Prohibited Conduct Under This Policy

TI Belgium, in compliance with all applicable anti-corruption, anti-discrimination and harassment laws and regulations, enforces this policy with the following definitions and guidelines:

Unethical Behaviour

TI Belgium does not tolerate corruption and prohibits bribery in any form, whether direct or indirect. This includes facilitation payments which are bribes and must not be made.

It is a violation of this Policy



- to accept directly or indirectly any discount, gift, entertainment or favours that may influence or be perceived to influence the TI Belgium's operations or the performance of the duties or the judgment of the TI Belgium members, interns, volunteers or consultants. Moreover, all gifts between the value of Euro 20 and Euro 50 will be registered and all gifts with a value of more than 50 EURO will be refused. The registration of the gifts consists in a reporting thereof to a member of the EXCOM and the recording thereof in a register.
- to engage in any activity or transactions or acquire any position or function, whether paid or unpaid, that is incompatible with the proper functioning of TI Belgium and that may bring TI Belgium as a whole into disrepute. Moreover, private affairs should be arranged so as not to engage in any activity that might impair the credibility of TI Belgium by giving the impression that TI Belgium is fostering individuals, public or private institutions whose behaviour is perceived as not being in accordance with TI Belgium's values.
- to use TI Belgium business relationships to solicit or obtain favours or improper benefits in private life.
- to allow our personal political affiliations and/or activities to unduly influence or interfere with the political neutrality that is the hallmark of the TI movement.
- to use assets under control of TI Belgium, including financial assets to cover travel expenses, for other purposes than for the advancement of the TI Belgium's objectives.

Discrimination

It is a violation of this Policy to discriminate inter alia on the basis of a person's age, sexual orientation, marital status, birth, fortune, religious or philosophical conviction, political conviction, trade union affiliation, language, current or future state of health, disability, physical or generic characteristics or social background.

This policy is intended to comply with the prohibitions stated in the anti-discrimination laws.

Harassment

TI Belgium prohibits harassment of any kind, including sexual harassment, and will take appropriate and immediate action in response to complaints or knowledge of violations of this Policy. For the purposes of this Policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce any member, staff or volunteer.

The following examples of harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this Policy:

- Verbal harassment includes inter alia comments that are offensive or unwelcome regarding a person's age, sexual orientation, marital status, birth, fortune, religious or philosophical conviction, political conviction, trade union affiliation, language, current or future state of health, disability, physical or generic characteristics or social background.
- Nonverbal harassment includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults or shows hostility, aversion or disrespect toward an individual or group because of inter alia age, sexual orientation, marital status, birth, fortune, religious or philosophical conviction, political conviction, trade union affiliation, language, current or future state of health, disability, physical or generic characteristics or social background.



Sexual Harassment

Sexual harassment is prohibited under this Policy. Sexual harassment is defined as “unwelcome sexual advances, request for sexual favours and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for decisions or when such conduct has the purpose or effect of creating an intimidating, hostile or offensive environment”.

Sexual harassment occurs when unsolicited and unwelcome sexual advances, requests for sexual favours or other verbal or physical conduct of a sexual nature:

- Is made explicit or implicit a term or condition for the person being part of TI Belgium;
- Is used as a basis for decision regarding this person;
- Creates an intimidating, hostile or otherwise offensive environment towards this person.

Sexual harassment may take different forms. The following examples of sexual harassment are intended to be guidelines and are not exclusive when determining whether there has been a violation of this Policy:

- Verbal sexual harassment includes suggestive comments, jokes of a sexual nature, sexual propositions, requests for any type of sexual favour and verbal abuse or “kidding” that is oriented toward a prohibitive form of harassment, including that which is sexual in nature and unwelcome;
- Nonverbal harassment includes the distribution, display or discussion of any written or graphic material that are sexually suggestive or show hostility toward an individual or group because of sex; content in letters, notes, facsimiles, e-mails, photos, text messages, tweets or other forms of communication that are sexual in nature and offensive.
- Physical sexual harassment includes unwelcome, unwanted physical contact and forced sexual intercourse or assault.

Courteous, mutually respectful, non-coercive interactions between members, interns, volunteers and consultants that are appropriate in the TI Belgium environment and welcomed by both parties are not considered to be harassment, including sexual harassment.

Retaliation

No hardship, loss or penalty may be imposed on a member, intern, volunteer or consultant in response to:

- Filing or responding to a bona fide complaint of discrimination or harassment;
- Appearing as a witness in the investigation of a complaint;
- Serving as an investigator of a complaint.

Lodging a bona fide complaint will in no way be used against the member, intern, volunteer or consultant when such reporting person has reasonable grounds to believe that information reported was true at the time of reporting. However filing malicious or abusive complaints by which the reporting person knowingly reports wrong information, is an abuse of this Policy and will be treated as a violation.

Any person who is found to have violated this aspect of the Policy will be subject to discipline including exclusion of TI Belgium.



Environmental Responsibility

TI Belgium is committed to reducing environmental impact, within all its operations and conduct.

TI Belgium will strive to integrate and apply environmental values into its decision-making processes and in its relationships with external partners and the TI movement.

Implementation

Copies of this Policy will be provided to each member, intern, volunteer and consultant and will be published on the TI Belgium website.

The Policy will be annexed to all contracts of engagement with interns, volunteers and consultants and signed along with these.

Confidentiality

All complaints and investigations are treated confidentially to the extent possible and information will be disclosed strictly on a-need-to-know basis.

Complaint Procedure

TI Belgium has established the following procedure for lodging a complaint of unethical behaviour, harassment, discrimination or retaliation. TI Belgium will treat all aspects of the procedure confidentially to the extent reasonably possible.

- Complaints should be submitted either in person or in writing, to the Chair of the TI Belgium Board, as soon as possible after the suspected breach of this Policy has occurred.
- The Chair will receive the complaints in confidence, give advice to the persons concerned on the matter raised and on the outcome thereof.
- The Chair may to this end consult internally and externally in order to solve the matter raised in the interest of TI Belgium.

In the event the complaint would concern the Chair, the complaint should be lodged with the most senior (in terms of tenure) member of the Board of Directors. The above procedure would equally be applicable.

This internal TI Belgium Complaint Procedure is complementary to any reporting to an independent competent authority and does not stand in the way nor is it intended to prevent or discourage any victim or witness to seize an independent competent authority and to report such incident.

Review of the Policy

This Policy shall be reviewed on a regular basis. Amendments to this Policy shall be discussed with all stakeholders. Final changes must be approved by the TI Belgium Board of Directors.

