

## **C O D E O F C O N D U C T**

### **ORANGE HOUSE PARTNERSHIP**

Vereniging zonder winstoogmerk (VZW)

Non profit association (NPA)

Association sans but lucratif (ASBL)

#### **Article 1: Purpose**

1. Orange House Partnership is committed to the highest possible standards of ethical, moral and legal performance. In keeping with this commitment, this policy aims to ensure that all members, affiliated members and employees of Orange House Partnership are aware of the level of conduct and integrity that is expected of them.

#### **Article 2: Scope**

1. This policy applies to all members, affiliated members and employees of Orange House Partnership, including its part-time, temporary and contract employees, hereafter referred to as Orange House partners, all of whom are bound to adhere this policy by signing the Code of Conduct upon entering Orange House Partnership.

#### **Article 3: Objectives**

1. The objectives of the Code of Conduct are to:
  - a) provide Orange House partners with guidelines for identifying potential conflicts of interest and breaches of trust;
  - b) help ensure that Orange House partners do not place themselves, or permit themselves to be placed, in a position which would constitute a conflict of interest or breach of trust;
  - c) promote high standards of professional conduct and values among Orange House partners

#### **Article 4: Responsibilities**

1. The Orange House Management Team shall implement and administer the Code of Conduct. It shall also ensure that the ethical standards set forth herein are promoted and investigate any reported violation of this policy and approve and administer any subsequent corrective action.

2. The Managing Director of Orange House Partnership shall ensure that all employees under his supervision, the Project Leadership Team (members), the Group of Specific Experts (associated experts) and all other members and associated experts are familiar with the Code of Conduct. The Managing Director shall advise the Management Team of any perceived violation of this policy by a member of the staff, and institute appropriate preventative or corrective action.

### **Article 5: Proper Conduct**

1. The Code of Conduct requires that any Orange House partner when representing, or acting on behalf of, or assist in any activities of Orange House Partnership must:

- a) behave honestly and with integrity;
- b) act with care and diligence;
- c) treat everyone with respect and courtesy, and without harassment;
- d) declare truthfully his or her potential financial and/or intellectual conflicts of interests annually or more frequently as appropriate by completing the Declaration of Interest form annexed to this Code of Conduct;
- e) take reasonable steps to avoid any conflict of interest (real, apparent, or perceived) in connection with his Orange House Partnership involvement;
- f) use Orange House Partnership resources in a proper manner with a view of balancing costs and effectiveness;
- g) at all times behave in a way that upholds the Orange House Partnership values and the integrity and good reputation of Orange House Partnership;
- h) while on duty overseas, at all times behave in a way that upholds the good reputation of Orange House Partnership.

### **Article 6: Prohibited Conduct**

1. The Code of Conduct requires that any Orange House partner when representing, or acting on behalf of, or assist in any activities of Orange House Partnership must not:

- a) provide false, misleading or intentionally incomplete information in response to a request for information or that is made in connection with the person's role as Orange House Partnership adviser;
- b) give misleading advice following a request for advice or that is provided in connection with the person's role as Orange House Partnership adviser;
- c) make improper use of privileged, proprietary or confidential information, obtained from any third party Orange House Partnership deals with, in order to gain, or seek to gain, a benefit or advantage for the partner or for any other person;
- d) make improper use of the Orange House partner's duties, status, power or authority, in order to gain, or seek to gain, a benefit or advantage for the employee or for any other person.

## **Article 7: Reporting Breaches**

MB/M(2009)2

1. Orange House partners who have reason to believe that this Code of Ethics has been breached in any way are encouraged to bring their concerns to the Managing Director or the Management Team of Orange House Partnership. No adverse action shall be taken against any partner who, acting in good faith, brings forward such information.
2. Violation of this policy by any Orange House partner may constitute a cause for corrective action. Any reported violation of the Code of Ethics will be subject to investigation by the Orange House Management Team. Such investigation would include hearing the partner considered to have breached the Code of Conduct and reviewing reports or other substantiation of the claim of misconduct.
3. If an investigation finds a partner guilty of breaching the Code of Conduct policy, the corrective action pursued against the partner shall be commensurate with the nature and severity of the violation.

## **Article 8: Modification and Amendment**

1. Orange House Partnership reserves the right to modify or amend this policy as it may deem necessary.

Brussels, 13 May 2009

Attached to this document are:

### **Annex 1:**

List of signatures of all members, affiliated members and employees of Orange House Partnership, including its part-time, temporary and contract employees, referred to in the Code of Conduct as Orange House partners

### **Annex 2:**

Declaration of Interest Form

**ANNEX 1 to Document MB/M(2009)2**

**(page 1)**

**List of signatures of all members, affiliated members and employees of Orange House Partnership, including its part-time, temporary and contract employees, referred to in the Code of Conduct as Orange House partners**

<b>Date dd/mm/yyyy</b>	<b>First and family name</b>	<b>M/AM<sup>1</sup></b>	<b>Signature</b>

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<sup>1</sup> M = OHP Member (Management Board, Project Leadership Team (PLT);  
AM = Affiliated Member of OHP (experts)

**ANNEX 1 to Document MB/M(2009)2**

**(page 2)**

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<b>Date dd/mm/yyyy</b>	<b>First and family name</b>	<b>M/AM<sup>2</sup></b>	<b>Signature</b>

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(page 3)

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Date dd/mm/yyyy	First and family name	M/AM <sup>3</sup>	Signature

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## **ANNEX 2**

### **Declaration of Interest Form**