

ANTI-BRIBERY CODE OF CONDUCT

About CIPM

Center for Innovation and Policy in Moldova (www.cipm.md) is an independent, non-profit think-tank founded by a group of experts with large expertise in public policies and structural reforms. CIPM is dedicated to the European integration of the Republic of Moldova and promotes the commitment of the country to the democratic values of human rights and rule of law. The main strategic areas of intervention of the Center for Innovation and Policies in Moldova (CIPM) are:

- Advocacy for active citizenship, civic participation and democracy;
- Promoting participation and open collaboration in the development of public sector innovations;
- Education development, raising awareness, promotion of multiculturalism and combating discrimination;
- Encouraging debates on European policies, their impact on Moldovan society as well as challenges of the European integration process;
- Supporting Moldovan government to improve its effectiveness and impact for peacebuilding and conflict transformation through consultations, research and policy analysis;
- Providing expertise on harmonization of national legislation with the European one and adopting and implementing the European standards;
- Research, development and innovation on social, political and economic sciences.

Scope

The purpose of this Anti-bribery Code of Conduct is to set out the values, principles and responsibilities CIPM adheres to. Every employee and every person associated with CIPM is covered by this Code of Conduct. It applies to all staff, experts, director, and employees, including contractors and temporary workers of CIPM. All activities carried out on CIPM behalf must be compliant with this document regardless of local laws or culture.

CIPM are committed to plan and implement all the activities with integrity, avoiding corruption of all kinds, including bribery of government officials.

For the purposes of this document, the term "government official" is broadly defined to include:

- ✓ Any officer or employee of any government entity, department, or agency
- ✓ Any employee of a state or government-owned business, school, hospital, or other entity
- ✓ Any political party or official thereof
- ✓ Any candidate for political office
- ✓ A public international organization or any department or agency
- ✓ Any person acting in an official capacity on behalf of a government entity

This code of conduct demands compliance with all relevant laws and CIPM principles.

In its activity CIPM is guided by the following principles:

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Transparent partnership cooperation/Due diligence. Whenever CIPM engages and expert or establishes a cooperation partnership within a project it investigates to determine the reputation, professional capability and experience, financial standing and credibility of such person/partner and the record of such person/partner's adherence to applicable laws. CIPM never enter into any relationship with a third party without an inquiry into the third party's background, qualifications and reputation. Any issues raised during this due diligence review are addressed prior to entering the relationship.

Human rights as the baseline. CIPM supports and respects the protection of human rights as defined in the UN declaration of human rights signed at Paris on December 1948 the 10.

Repudiation of all forms of terrorism. CIPM repudiates all forms of terrorism. CIPM would neither create any relationship of employment or business relationship with subjects, whether natural or legal persons, involved in acts of terrorism, and not otherwise facilitate any of their activities.

Freedom of opinion. CIPM respects every democratic opinion and not makes financial contributions to political parties or political forces.

Non-discrimination/equal opportunity. CIPM doesn't discriminate between gender, race, language, religion, political or other personal or social convictions or economic conditions, including its partners, but always employ the people best skilled for a particular job.

Working and remuneration. Employees are recruited only on the basis of regular employment contracts, not tolerated is any form of illegal labor. CIPM complies with applicable laws and industry standards on working hours, including overtime, and recognizes the right to a fair remuneration.

Compliance with laws. CIPM complies with laws and regulations in force, as well as the democratic order and therefore will not start or continue any relationship with those who do not intend to comply with this principle.

Anti-corruption. CIPM does not demand or offer, promise, give a bribe or other undue advantage to obtain or retain any contracts/finances or any other improper advantage. CIPM does not only prohibit bribery (or attempts to bribe) within its operations in direct contact with third parties, does not accept bribery carried out through intermediaries either.

Money laundering. CIPM does not involve in financial transactions derived from or to be used for criminal activities. All business relationships involving financial transactions are verified, documented and accurately recorded. CIPM undertakes to take all necessary precautions to verify the reliability of these transactions, as well as the legitimate origin of the funds and the means used.

Payments to 3rd parties. All payments made are transparent and proper. No payments may be made as a subterfuge for bribery. It is contrary to this code to offer, promise, authorize, pay or give, either directly or indirectly, to any other person (whether a government official or not) any financial or other advantage in order to secure an improper advantage, to obtain or retain business, or direct business to any other person or entity.

Dealings with international partners. CIPM is committed to ensuring that all its dealings intervening with partners at the international level, are in full compliance with applicable laws

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and regulations. CIPM is committed, within the limits of its ability, to co-working with honesty and transparency with the authorities, including foreign ones, who may request information or conduct investigations into the relationships with international partners.

Political and charitable contributions and sponsorships. CIPM does not make any contributions to political parties, party officials and/or candidates. All requests for political contributions are channeled through the Managing Director.

Gifts. CIPM only accepts or provides hospitality and gifts within pre-defined limits and never to secure any improper advantage or to influence a decision. Gifts, hospitality, and sponsorship may only be made and/or received in compliance with this code. In any event, approval prior to acceptance of corporate hospitality must be obtained from Managing Director where the value of the hospitality exceeds €100.

Protection of privacy and confidentiality. CIPM is committed to protecting the privacy of individuals and legal entities, collecting and processing their personal data in full respect of privacy rules in order to prevent the disclosure or dissemination of personal data in absence, or beyond the limits, of the consent given. CIPM respects ethical and legal responsibilities to protect confidential and proprietary non-public information and is committed to communicate only as necessary. CIPM maintains this confidentiality and does not use confidential and proprietary non-public information for personal advantage or for non-business use.

Relationship with local authorities and public institutions. CIPM pursues the highest levels of integrity and honesty in relationships, contractual and otherwise with the public institutions, as well as with individuals who pursue public interest goals.

Every employee takes individual responsibility for complying with this code and is familiar with, and strictly comply with this code of conduct. All personnel to which this code of conduct is applicable keep themselves current with any such changes and comply with such changes regardless of whether or not the changes have been incorporated into any given version of this code of conduct.

CIPM monitors and manages the risks of acts of corruption, conflicts of interest and any other corporate governance violations by defining its Code of Conduct for the prevention of corruption, conflicts of interest and by providing for the adoption of appropriate procedures as well as for training and information activities.

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