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# Code of Conduct

**This Code of Ethics sets forth the ethical principles guiding EJF’s outreach activities with third parties. It covers inter alia overarching principles, treatment of information and conduct of lobbying. These are the standards to which EJF requires its Executive, its members, and those working for EJF as independent operators, to adhere.**

## **Why**

While compliance with laws and regulations is mandatory, it also shows EJF’s commitment to be a responsible organisation. It demonstrates we care about and respect the people we deal with in our (outreach) activities. This Code is intended to deter wrongdoing and to

promote the ethical conduct of EJFs' activities.

## **How**

Compliance with the standards of this Code is monitored by the Board of EJF. Disciplinary, and in the appropriate case, legal action in respect of non-compliance is the responsibility of the Chairman under the supervision of the Board. Any conflict between laws and regulations and this Code of Ethics and Business Conduct should be brought to the attention of the Board of EJF.

## **Our Code of Ethics and Business Conduct**

### **Overarching principles**

EJF will conduct its relationships with all third parties with whom it deals in its outreach activities, with integrity and transparency.

EJF will conduct its affairs with all third parties with whom it deals in its outreach activities, in compliance with all relevant laws, as well as with the rules of behaviour and established ethics regulating the conduct of such third parties.

EJF will not in connection with its outreach activities, or at all, make, nor facilitate nor encourage, any

financial inducement, bribe, or corrupt practice.

## **Treatment of Information**

EJF treats confidentiality of information, both of its and others' information, seriously and respects the requirements of confidentiality imposed by law.

EJF exercises no control over the independent academic research it funds beyond identifying areas for research, formulating the scope of the research, and paying for it.

## **No transfers of monetary value or for money's worth**

In its outreach activities with third parties, whatever their purpose, EJF will not offer any monetary inducement or financial reward in order to advance our objectives.

Any social interaction between EJF and such third parties as part of its outreach activities or otherwise will be at a modest level, consistent with conventionally accepted practice.

EJF will not entertain, or make gifts to, such third parties beyond what is consistent with their responsibilities, duties and expectations, and in any event will be of very modest value. As an example of what EJF considers permissible, EJF may provide, free, in

order to further its advocacy objectives, copies of published research output or other written work it has sponsored or funded, or helped to sponsor or fund, in its areas of focus. EJF will also be free to invite such third parties to participate socially, in a modest and appropriate manner, as part of one or more of its educational events, such as a workshop, book launch, conference, round-table, seminar or similar.

### **Declaration of who we are**

When EJF representatives speak to such third parties as part of EJF's outreach activities we will declare that we are speaking for EJF, and explain its objectives, and its membership, when asked to do so or otherwise if considered appropriate.

### **Compliance with Competition law**

As a small, non-profit organization, EJF does not compete commercially on any level in the market place. It does compete for ideas.

Its members are all competitive businesses, with well-developed competition compliance programmes of their own and reputations they jealously uphold. They cover a variety of industry

sectors and some compete within one sector, and they have their own separate and distinct commercial interests.

Accordingly, EJV has a strong attachment to the maintenance of strong competition and to competition law compliance.

EJV abides by the strictures of EU competition law and equivalent provisions of national laws.

Accordingly, in pursuing its purposes and objectives neither EJV, nor any of its members, will discuss or exchange information relating to the commercial policy of any business entity, including any of EJV's members, with anyone, in such a way as to lead to the infringement, or the perception of infringement, of Articles 101 and 102 of the Treaty of the Functioning of the European Union (“TFEU”), and national equivalents.

**Membership of EJV or access to information of EJV is not conditional upon a promise not to participate in associations or entities which compete with existing members. Compliance is monitored by the Board of EJV on a regular basis.**

## Statute

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EJF, a Brussels based non-for profit organization, leads and promotes an open dialogue on collective redress and effective dispute resolution mechanisms while contributing to the EU decision-making process by engaging regularly with the EU Institutions and other relevant stakeholders.