



## **CODE OF CONDUCT**

## Introduction

Adopting and adhering to ethical principles is the foundation of the operation of the Cyprus Network for Corporate Sustainability and Responsibility (hereinafter “CSR Cyprus” or the “Network”). This Code of Conduct affirms the Network's commitment to fostering a culture of sustainability, corporate responsibility, and transparency in all its relationships and collaborations.

This Code of Conduct supplements the Articles of Association (latest update: 26.10.2023) and has been drafted with the following primary objectives:

- defining clearly the principles that govern the Network’s operations
- establishing a shared understanding of the Network’s values, purpose, and mission
- providing a framework and standards of obligation for Members, personnel, and all stakeholders/partners
- guaranteeing the highest possible quality of services and support
- promoting an environment of robust operation and sustainable engagement, free from discrimination and unethical behaviour
- serving as a guide for those who share the Network’s principles and wish to contribute to its purpose.

## Values

Every action undertaken by CSR Cyprus, across its entire value chain, is guided by the advancement of sustainability and governed by the principles of sustainable development. Through its core purpose and activities, the Network seeks to strengthen the performance and impact of its Member organizations and all counterparties within the Environmental-Social-Governance (ESG) framework.

- The core values that define and guide CSR Cyprus are
- Sustainability
- Responsibility
- Integrity
- Transparency
- Professionalism
- Trust
- Equality

Furthermore, the Network aligns itself with the principles of CSR Europe, of which it is a National Partner Organisation (NPO).

## Scope of Application

This Code of Conduct applies to:

- CSR Cyprus personnel
- the Board of Directors
- the Members
- partners, suppliers, and external collaborators
- every stakeholder or any other interested party interacting with the Network.

## Core Principles for Stakeholders

CSR Cyprus recognizes its responsibility to promote sustainability by championing respect for human rights, advancing diversity, inclusion, and integration, upholding fair labour practices, and exercising due diligence throughout the supply chain as essential components of sustainable development.

To this end, every stakeholder of the Network must:

- respect and promote human rights
- apply principles of fair treatment
- operate in full compliance with all applicable laws governing sustainability, employment, occupational health and safety, and environmental protection. Stakeholders must not encourage, initiate, or participate in actions that may be criminal or contrary to the principles of responsible business conduct
- implement due diligence measures within their own value chain
- prohibit child labour and forced labour
- prohibit all forms of workplace discrimination
- act ethically, performing their duties and fulfilling their obligations to the Network with honesty, impartiality, and professionalism
- comply fully with the Network's policies and procedures
- protect the collective interests of the Network and provide any information relevant to its legitimate interests
- interact with all other stakeholders with respect and mutual appreciation
- operate with a spirit of healthy business competition and cooperation, sharing best practices that contribute to embedding a culture of sustainability
- raise awareness and report any suspicious or unethical behaviour to the Network and the competent authorities
- safeguard confidential information obtained through participation in CSR Cyprus and refrain from using it for personal gain or for purposes that fall outside the principles of the Network.
- not misuse their position or status within the Network to secure personal benefits, as further detailed below
- not engage in any bribery or other form of corruption.

## Relationship with State Entities

The Network maintains and develops collaborations with public sector entities for the purposes of education, information and raising sustainability awareness. All such collaborations are conducted in full compliance with the applicable legislative and regulatory framework.

In addition, the Network is duly registered in the European Transparency Register.

The Network does not provide contributions —whether direct or indirect— to political parties, movements, committees, political organizations, trade union organizations, or to any of their representatives or candidates.

## Conflict of Interest

Every stakeholder must:

- abstain from any action that prioritizes personal interests to the detriment of the Network
- avoid engaging in business, political, or profit-driven activities or motives that could compromise their duty to the Network.
- refrain from improperly leveraging any advantages arising from their participation, position, or collaboration with the Network for personal gain.

If an action or matter under review may be influenced by a position held by any Member of the Board of Directors, personnel, or another Network stakeholder, that individual is required to recuse themselves from the relevant process or decision-making.

## **Equal Treatment**

The Network upholds policies of non-discrimination and equal treatment across all activities and transactions. Requests submitted by third parties concerning cooperation proposals are evaluated through a defined procedure, as outlined in the relevant Policy, ensuring fairness, transparency, and consistency in decision-making.

## **Health and Safety**

CSR Cyprus implements the necessary procedures and preventive measures, to the extent possible, to safeguard the health and safety of all participants in its events and activities. Compliance with safety rules includes, but is not limited to:

- providing appropriate hygiene standards and protective conditions
- systematically preventing risks and accidents in workplaces and event venues.
- Ensuring adherence to all applicable legislation.

At the same time, the Network promotes a culture of prevention and continuous awareness, encouraging all stakeholders to actively contribute to maintaining a safe and healthy environment.

## **Confidentiality & Personal Data Protection**

The Network has adopted a Policy on the protection and processing of Personal Data, published on its website and governed by the applicable legislation (General Data Protection Regulation – GDPR).

The Board of Directors, personnel, and all other Network stakeholders must treat all information relating to internal operations, activities, and decisions —not intended for public distribution or disclosure to third parties— with the utmost seriousness, confidentiality, discretion, and sensitivity.

Members and other stakeholders are responsible for:

- Protecting any data they become aware of through their involvement with the Network.
- Ensuring the secure management and storage of such data.
- Refraining from any unauthorized disclosure or publication to third parties.

Any instance of damage or prejudice to the interests of the Network or its Members is considered ground for termination of Membership status and cessation of any cooperation with third parties.

## **Corruption & Bribery**

The Network enforces a zero-tolerance policy against any form of abuse for personal gain that constitutes corruption or bribery.

Incidents arising during the Network's operations that compromise its functioning or the quality of its work will be reviewed by the Board of Directors with the utmost seriousness, confidentiality, and diligence.

Any confirmed case of corruption or bribery are considered grounds for the termination of Membership status and the immediate cessation of any cooperation with third parties.

## **Financial Activities & Anti-Money Laundering**

CSR Cyprus and its stakeholders must operate with full financial transparency and integrity. The following are prohibited:

- engaging in any form of money laundering or undisclosed financial transactions. All financial activities—including accounting, resource management, and procurement— must be conducted transparently, in compliance with current legislation and the Network’s principles, thereby safeguarding the trust of all parties.
- undertaking any action or collaboration that could be associated with such practices.

Any violation of the above constitutes grounds for the termination of Membership status and the cessation of any cooperation with third parties.

In addition, the Network and its stakeholders must:

- comply fully with applicable national legislation and international standards for the prevention and combatting of money laundering and terrorist financing.
- implement robust internal control procedures and promptly report any suspicious transactions or behaviours to the competent authorities.

## **Whistleblowing**

CSR Cyprus encourages the timely, responsible, and well-documented reporting of any violation of law, policy, or ethical principles that may cause harm to the Network, its Members, stakeholders, or society.

Every stakeholder has both the right and the obligation to report such cases through secure and confidential communication channels to the Board of Directors, personnel, or other competent authorities.

The Network strives to protect, to the maximum extent possible, those who submit reports from retaliation, adverse consequences, or discrimination, ensuring that the process is conducted with discretion and respect.

Reports may include, but are not limited to, cases of:

- corruption
- financial misconduct
- breach of confidentiality
- conflict of interest
- misuse of the Network’s name or mark
- any behaviour contrary to the principles of responsible business conduct.

All reports will be managed through a structured process of recording, evaluation, investigation, and decision-making by the Board of Directors, with ongoing monitoring of the incident. The detailed procedure is defined in a separate Network policy.

## **Gift & Hospitality Acceptance/Offering Policy**

CSR Cyprus adopts a zero-tolerance policy for the Network itself, its Members, and all stakeholders with respect to:

- bribes
- improper incentives or “kickbacks”
- any form of undue influence

Only the acceptance or offering of gifts and hospitality that are nominal, customary, and free from any influence on independent judgment or expectation of reciprocation is permitted.

Invitations to hospitality must be exclusively related to professional or educational activities and must not exceed standard professional practices.

## **Use of Name & Distinctive Mark/Logo**

Members of CSR Cyprus are able and encouraged to use the Network’s name and distinctive mark/logo in their communications with third parties, provided that such use has received prior approval from the Network.

Permitted uses include:

- corporate websites (to promote participation in CSR Cyprus, e.g., by stating “*Member of CSR Cyprus*”).
- communication materials (such as press releases, presentations, brochures, etc.).
- educational or informational activities (in cases of co-organization or participation).
- sustainability or ESG reports, to document the Member’s participation in the Network and commitment to its principles.
- social media references, strictly to promote the Member’s participation in or collaboration with the Network, and always in a manner that reflects its principles.

Prohibited uses include:

- advertising campaigns to promote products or services.
- support for political or trade union positions.
- implying representation of CSR Cyprus in any action without the Network’s consent.
- creating a misleading impression of representation or an official position of CSR Cyprus without the Network’s consent.

Businesses or organizations that are not Members of the Network are not entitled to use the name or mark/logo under any circumstances.

## Review

This Code may be **reviewed, revised, and updated** by the Board of Directors whenever deemed necessary, in order to adapt to changes in the institutional, social, and business environment.

The Network will inform all interested parties of any modifications, providing the updated text of the Code in an accessible format on its official website.

## Binding Nature

This Code is binding upon all Members of CSR Cyprus, its personnel, and all partners and stakeholders.