

Transport & Environment (T&E) - Ethical Guidelines

Code of Conduct - SEAH Policy - Business Ethics - Whistleblower Policy

1. Introduction

This document presents T&E ethical guidelines, a set of principles governing all T&E activities and persons representing the organization, including its employees, consultants and Board Members (i.e. collaborators of T&E). It contains four separate sections: the Code of Conduct, the SEAH Policy, the Business Ethics and a Whistle-blower Protection Policy. It shall be of knowledge to all T&E communities (i.e. including both Staff and Members) and taken into account in the T&E Labour Regulations. The contents of this document is approved by the SMT and Board.

The Ethical Guidelines outline the expectations we have of ourselves as collaborators in T&E and articulate the behaviors that are mandatory in our professional community. As a T&E collaborator, you are expected to accept certain responsibilities, to adhere to acceptable business principles in matters of personal conduct, to exhibit a high degree of personal integrity at all times, and to conduct yourself in a lawful manner, consistent with the highest ethical standards.

Violations may result in disciplinary action.

2. Code of Conduct

Mutual Respect between you and T&E

Respect for T&E means not only avoiding misuse of organization funds and property, it also includes creating and maintaining accurate records, safeguarding all types of information about T&E, complying with internal controls, and procedures, and refraining from conduct that interferes with the organization's proper functioning. This not only involves respect for the rights of others, but also demands that you refrain from any behavior that might be harmful to you, your co-workers, or T&E.

Your conduct directly reflects on T&E; consequently, you are encouraged to observe the highest standards of professionalism at all times. The responsibility you undertake as an employee of T&E is your duty to take ownership for the decisions you make or fail to make, the actions you take or fail to take, and the consequences of that result.



As practitioners in the NGO community, we make decisions and take actions based on the best interests of society, public safety, and the environment.

- We accept only those assignments that are consistent with our background, experience, skills, and qualifications.
- We fulfil the commitments that we undertake - we do what we say we will do.
- When we make errors or omissions, we take ownership and make corrections.
- When we discover errors or omissions caused by others, we communicate them to the appropriate body as soon as they are discovered.
- We accept accountability for any issue resulting from our errors or omissions and any resulting consequences.
- We protect confidential information that has been entrusted to us.

Romantic Relationship

- Reporting Requirements: If a romantic or close familial relationship develops between colleagues, it must be disclosed to the Director of HR if the individuals are in a direct reporting line, if one has authority over the other or if it poses a conflict of interest to the team.
- Mitigation: Upon disclosure, the Director of HR will work with both parties to discreetly and respectfully adjust reporting structures or team assignments to eliminate any potential conflict, ensuring fairness for the entire team.

Inappropriate Behavior

Any action that can be qualified as a criminal offence by law, including, but not limited to theft of property, falsifying documents, illegal manufacture, possession, use, sale, distribution or transportation of drugs shall be considered inappropriate.

In addition, types of behavior and conduct considered inappropriate include, but are not limited to, the following:

- Violating T&E's non-discrimination and/or harassment policies.
- Excessive absenteeism or tardiness.
- Working while under the influence of illicit drugs.
- Disrespectful and aggressive behavior toward others, like fighting or using obscene, abusive, or threatening language or gestures.
- Disregarding safety and/or security regulations.
- Insubordination.
- Failing to maintain the confidentiality policies of T&E.
- Conduct giving rise to a conflict of interest or the appearance of a conflict of interest.



The above listing is not all-inclusive and under T&E's policy of at-will employment, employment may be ended at any time for any lawful reason.

Discrimination

We do not discriminate against others based on, but not limited to, gender, race, age, religion, disability, nationality, or sexual orientation. We apply the rules of the organization without favoritism or prejudice.

3. SEAH Policy (Safeguarding and protection from Sexual Exploitation, Abuse and Harassment)

Transport & Environment (T&E) has zero tolerance for sexual exploitation, abuse and harassment (SEAH). All individuals have the right to live and work free from sexual misconduct, abuse of power, intimidation and discrimination. T&E is committed to preventing, reporting and responding to SEAH in all its activities, including internal operations, partnerships, advocacy, research and events.

Purpose and Scope

This policy aims to safeguard staff, partners, contractors, consultants, interns, volunteers, Board members, and all individuals and communities T&E engages with. It applies to all representatives of T&E, at all times, including during work, travel, missions, events and informal professional interactions.

Definitions

Sexual Exploitation: Abuse of a position of power, trust or vulnerability for sexual purposes.

- Sexual Abuse: Actual or threatened physical intrusion of a sexual nature.
- Sexual Harassment: Unwelcome sexual conduct that creates an intimidating, hostile or offensive environment.
- Sexual Misconduct: Any form of sexual exploitation, abuse or harassment.
- Survivor: A person who has experienced sexual misconduct.

Core Principles

- Survivor-centered and rights-based approach by providing a supportive environment and considering the survivor as a rights-holder.
- Zero tolerance for SEAH.
- Confidentiality and data protection.
- Accountability and due process.
- Protection against retaliation.
- Gender equality and respect for power dynamics

Prevention

T&E will foster a safe organizational culture through:

- Clear behavioral standards, T&E leadership principles and Codes of Conduct.
- Safe recruitment practices.
- Risk assessments for SEAH in programmes and partnerships.

Reporting Obligations

All T&E representatives are required to report any suspicion, concern or incident of SEAH promptly. Reports may be made through line managers, HR, Persons of Trust, senior management or established whistleblowing channels. Individuals are not required to report their own experiences.

Persons of Trust

The Person of Trust is a neutral alternative contact point for issues that affect staff and their work at T&E. The Persons of Trust has received basic training to support people with a range of psychosocial risks at work but their mission is limited to the informal processes. They can listen actively and offer empathetic and non-judgmental support. They can accompany the person to meetings if requested (as a support figure). Formal processes remain with line managers and HR.

T&E aims to have up to [3 trusted persons](#), of which at least one must be based in Brussels and at least one person outside Brussels.

Additional info about Persons of Trust available on [Intranet](#).

Complaints Mechanisms

T&E maintains safe, accessible and confidential complaints mechanisms, including internal reporting lines and whistleblowing channels. Anonymous reporting is permitted. Information will be shared strictly on a need-to-know basis.

Response and Case Management

All reports will be taken seriously and assessed promptly. T&E will ensure:

- Survivor consent wherever possible.
- Fair and impartial investigations.
- Appropriate disciplinary measures.
- Referral to authorities where legally required and safe.

Survivor Support

Support will be offered irrespective of whether a formal complaint is pursued. This may include psychosocial, medical, legal or workplace adjustments, guided by the survivor's wishes.

Protection Against Retaliation

Retaliation against complainants, survivors, witnesses or whistleblowers is strictly prohibited and will result in disciplinary action.

Roles and Responsibilities

- Board: Oversight
- SMT: Implementation and resourcing
- Directors & Managers: Safe environments and reporting compliance
- All Representatives: Upholding standards and reporting concerns

Disciplinary Measures

Breaches of this policy constitute serious misconduct and may result in sanctions up to and including dismissal, contract termination or referral to authorities, in line with T&E grievance and disciplinary procedures.

4. Business Ethics

T&E acts with integrity, competence, diligence, respect and in an ethical manner with the public, project partners, coalition partners, media partners, suppliers, colleagues in other NGOs and other participants in our field.

General Issues

T&E does not engage in any professional conduct involving dishonesty, fraud, or deceit, or commit any act that reflects adversely on our professional reputation, integrity, or competence.

T&E staff shall refrain from accepting gifts with an estimated value over € 100 in situations related to their professional activities.

Financial Reporting

It is important that T&E's financial and compliance reports be prepared in accordance with a comprehensive basis of accounting. Employees are expected to promptly and fully provide any financial information requested by management, external auditors, or the Board.

Contracts



All contracts must be in writing and approved in advance and signed by the T&E Executive Director. All contracts shall be awarded in a transparent manner and comply with T&E's Tendering policy.

In all cases, contracts should include terms, clear descriptions of deliverables, due dates, and the amount to be paid. All original contracts must remain on file at the T&E offices in Brussels.

Conflict of Interest

T&E collaborators must avoid any situation in which their personal interests—financial, professional, or otherwise—conflict, or appear to conflict, with the interests of the organization.

- **Disclosure:** Collaborators are required to disclose in writing any potential or actual conflicts of interest to the Executive Director as soon as they arise.
- **Mitigation:** When a conflict is identified, the individual involved shall recuse themselves from any decision-making process, negotiations, or influence regarding the matter in question.
- **External Activities:** Engagement in outside professional activities, including board memberships or consulting for entities in the same field, must be approved by the Executive Director in advance to ensure there is no conflict with T&E's mission and integrity.

Protection of Information

Data, information and documents pertaining to T&E are to be used in performance of one's duties and may be disclosed or communicated to persons outside of the organization only to the extent that such information is needed by outsiders in connection with their business relations with T&E. This applies both during one's employment or other relationship with T&E and after employment or other relationships terminate.

Ethics Complaints

T&E brings ethical violations to the appropriate point for resolution, whether that is internal or external resolution.

5. Whistleblower Policy

Reporting responsibility

This Whistleblower Policy is intended to encourage and enable employees and other professional stakeholders to report unethical, illegal, or unsafe practices within T&E without fear of retaliation. It is the responsibility of all board members and employees to report concerns about serious violations of T&E's code of ethics or suspected violations of law or regulations that govern T&E's operations.

No retaliation



It is contrary to the values of T&E for anyone to retaliate against any board member or employee who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected corruption or any other financial irregularity, or suspected violation of any regulation governing the operations of T&E. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting procedure

We maintain an "Open Door Policy" but provide a formal online tool (Personio) to ensure compliance with EU Whistleblowing Directive.

- Internal Discussion: Our standard practice is to raise questions or concerns directly with your immediate supervisor first.
- Escalation: If you are uncomfortable speaking to your supervisor, or unsatisfied with their response, contact the Executive Director or the President of the Board directly.
- Online Reporting (Personio): For secure anonymous, GDPR compliant reporting, use the Whistleblowing section in the Personio main navigation.

The Personio procedure (starting August 2026)

To guarantee anonymity and structured case management, T&E utilises the Personio Whistleblowing tool ([here](#)):

- Anonymous Submission: Reports can be filed through a secure, password-protected tool ([here](#)). You may communicate with case managers without ever revealing your identity.
- Controlled Access: Only the designated case managers can view complaints. Even standard Personio Administrators are restricted from this data.
- Two-Way Dialogue: The system allows for ongoing, anonymous messaging between the whistleblower and the Case Manager assigned to that complaint to gather additional evidence or provide updates.
- Case Managers: President of Board, HR VP- Board Member, Executive Director and HR Director.

Acting in good faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality



Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of reported violations

The responsible case managers will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.