



CODE OF CONDUCT
AND ETHICS POLICY
OF THE GiLE FOUNDATION
(GiLE OKTATÁSI ALAPÍTVÁNY)

Updated and approved
by the Board of Trustees
on the 2nd of August 2024.

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Contents

1. Statement of Purpose	3
2. Coverage	3
3. General Provisions.....	4
4. Fundamental Principles and Values.....	4
4.1. Honesty and integrity	4
4.2. Duty of care and loyalty	4
4.3. Transparency	4
4.4. Fairness and impartiality.....	5
4.5. Respect and human decency.....	5
4.6. Collaboration and teamwork	5
5. Principles for the Workplace	5
and Contribution Environment	5
5.1. Respect for laws and regulations	5
5.2. Respect for policies and guidelines.....	6
5.3. Health and safety	6
5.4. Conflicts of interest.....	6
5.5. Privacy policy and confidentiality.....	7
5.6. Legal representation	7
5.7. External communication	7
5.8. Whistleblowing and reporting	7
5.9. Equal opportunity and fair employment	8
6. Intellectual Property.....	8
7. Violation of the Code	8
8. Interpretation of the Code.....	9

1. Statement of Purpose

The purpose of this Code of Conduct and Ethics Policy (hereinafter: “Code”) of the GILE Oktatási Alapítvány (“Foundation”) is to establish and maintain a good standard of conduct and ethical behaviour in the Foundation. It outlines the norms, rules and responsibilities that are required to ensure that a high degree of honesty, transparency and impartiality is maintained among all personnel in the Foundation.

This Code is aligned with best practice, and it is intended to ensure that the activities of the Foundation do not jeopardise its reputation, credibility, or independence. It is also meant to provide appropriate guidance when it comes to executing ones’ roles and responsibilities in or on behalf of the Foundation.

2. Coverage

This Code covers all members on the Board of Trustees of the Foundation (hereinafter: “Board”), its Officers, Staff members, Contributors, and any other person whose is contracted to the Foundation (collectively hereinafter: “Personnel”). For purposes of this Code:

“Officers” shall mean the President, the Secretary, and the Treasurer.

”Staff” members shall mean any individual who enters into a contract with the Foundation to perform certain activities, with or on behalf of the Foundation, for regular compensation throughout the duration of their contract and who thus form part of the Foundation’s payroll. Staff members could therefore include interns, trainees, and any work placements, for example.

A “Contributor” shall mean any individual, other than a Board member, Officer, or Staff member, who contractually agrees with the Foundation to perform certain activities with or on behalf of the Foundation, free of charge and without any expected compensation.

This Code shall cover all Personnel for all internal and external activities of the Foundation. This includes, but is not necessarily limited to, all communications, documentation, and public/media interactions, regardless if the relevant Personnel member is remunerated by the Foundation or not, and regardless if they receive any form of compensation or not for the relevant activity or interaction.

3. General Provisions

The Foundation is an independent, not-for-profit organisation and all Personnel shall conduct their activities to pursue or promote its purpose and mission, further its aims and activities, and uphold its principles and values.

As set forth in the Deed and Bylaws, the Foundation was established exclusively for educational purposes. This document should be read in conjunction with these documents.

4. Fundamental Principles and Values

The Foundation has a set the following fundamental principles that all Personnel shall comply with, namely:

4.1. Honesty and integrity

Personnel shall always conduct their activities with honesty and integrity. They shall constantly strive to affirm the Foundation's credibility and promote an internal culture of honesty and integrity throughout the organisation.

4.2. Duty of care and loyalty

Personnel shall always conduct their activities with the duty of care and with the duty of loyalty to the Foundation.

Duty of care shall mean making careful and informed decisions when conducting activities in or on behalf of the Foundation. This includes making sure that one has all the necessary information that's required to act and taking the time to appropriately review such information.

Duty of loyalty shall mean always acting in the best interests of the Foundation and not putting one's personal interests ahead of the Foundation.

4.3. Transparency

Personnel shall be transparent with their actions, decisions, and communications. Transparency includes being clear and easily understood to an observer, and not being deceptive in any way. Transparency also demands due consideration of publicly revealing certain information that is in the public interest.

4.4. Fairness and impartiality

Personnel shall ensure that their personal judgement is not compromised, and cannot reasonably be perceived to be compromised, by bias, conflict of interest, or the undue influence of others. This includes avoiding any unlawful discrimination on the basis of sex, age, race, colour, national origin, religion, sexual orientation, physical handicap or disability, or any other basis prohibited by law.

4.5. Respect and human decency

Personnel shall respect the human decency of each other and third parties. This includes a respect for human rights, diversity, and inclusion.

4.6. Collaboration and teamwork

Personnel shall strive to work in collaboration with others when fulfilling their roles and responsibilities in or on behalf of the Foundation. It is important for Personnel to recognise that collaboration leads to greater synergies, brings people and organisations closer together, helps with problem-solving and also boosts the overall morale.

5. Principles for the Workplace and Contribution Environment

The Foundation has a set forth principles for the workplace and contribution environment that all Personnel shall comply with, both for an in-person or an online setting. The said principles are as follows:

5.1. Respect for laws and regulations

Personnel shall respect and abide by all applicable laws and regulations of Hungary under all circumstances. This includes, but is not necessarily limited to, the following:

- Act V of 2013 on the Civil Code;
- Act LXXXVIII of 2005 on Public Interest Volunteer Activities (“Public Interest Volunteer Act”);
- Act CLXXV of 2011 on the freedom of association, on public-benefit status, and on the activities of and support for civil society organizations (“Civil Act”);
- Act CLXXXI of 2011 on the court register of non-governmental organizations and related procedural rules (“NGO’s Proceedings Act”);

- Act CCXXII of 2015 on the general rules for trust services and electronic transactions (“Electronic Transactions Act”);
- Act II of 2007 on the admission and right of residence of third-country nationals (“Third-Country Nationals Act”);
- Regulation (EU) 2018/1806 of the European Parliament and of the Council of 14 November 2018 listing the third countries whose nationals must be in possession of visas when crossing the external borders and those whose nationals are exempt from that requirement (“Visa Regulation”);
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation: “GDPR”);
- 350/2011. (XII. 30.) Government Decree on the Financial Management of Civil Society Organizations, on Fundraising Activities and Public-Benefit Status;
- Act LXXVI of 2017. on the Transparency of Organizations Receiving Foreign Aid (“Transparency Act”);
- Act LXXVII/2013 on Adult Education;
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information; and
- Act C of 2000 on Accounting.

5.2. Respect for policies and guidelines

Personnel shall respect and abide by all adopted policies and guidelines of the Foundation. These documents are intended to provide further guidance when fulfilling one’s roles and responsibilities in or on behalf of the Foundation.

5.3. Health and safety

Personnel shall promote a healthy and safe workplace within the Foundation. Personnel have the right to work in healthy and safe conditions, and they also have the duty to ensure this by behaving responsibly in the workplace.

5.4. Conflicts of interest

Personnel shall avoid being placed in a position of conflict of interest, and avoid using their position for the advancement of any personal interest or personal gain. Personnel shall also disclose any ethical, financial, legal or other conflicts of interest that involve the Foundation. Personnel who have decision-making authority should remove themselves whenever a conflict of interest arises which involves the Foundation.

5.5. Privacy policy and confidentiality

Personnel shall respect the right to privacy and abide by the Foundation's Privacy Policy which can be easily accessed on the website.

Personnel shall treat as confidential any information relating to the Foundation, all its Personnel, its activities, its partners, donors, contributors or affiliates, and its participants or guests of any programme or event of the Foundation, which is of a confidential or a sensitive nature. This could include the Foundation's strategic plans, proposals for grants or funds from third parties, for example.

If there is any doubt with regards to the confidentiality or sensitivity of any information, then the relevant Personnel shall approach the Board or the President for its approval before making such information available to any third-party.

5.6. Legal representation

Personnel shall be careful to avoid representing the Foundation in any transaction with others whom there is an outside (business) affiliation or relationship.

The Board is the managing authority of the Foundation, and the President is the legal representative of the Foundation. At the same time, the Board may authorise someone else to legally represent the Foundation. Such authority may be general or confined to specific instances. Unless so authorised by the Board, no Officer shall have any power or authority to bind the Foundation by any contract or engagement or to pledge its credit or render it liable for any purpose or to any amount.

5.7. External communication

Personnel shall be careful to avoid communicating with external parties on behalf of the Foundation. Only authorised persons may communicate either orally or in writing (including email) on behalf of the Foundation. Those authorised persons that engage in such external communication shall comply with the provisions of this Code.

Personnel shall also be careful to avoid presenting their personal opinion or any other information in a way that could be construed to be that of the Foundation.

5.8. Whistleblowing and reporting

The Foundation encourages whistleblowing as an important means to report any wrongdoing and to manage any risks to the Foundation. Personnel are encouraged to immediately report any ethical issue to the Board.

5.9. Equal opportunity and fair employment

The Foundation strives to ensure equal opportunities for all Personnel, without regard to sex, age, race, colour, national origin, religion, sexual orientation, physical handicap or disability, or any other basis prohibited by law.

6. Intellectual Property

The Foundation's name and logo should only be used by authorised individuals, either by authorised Personnel or authorised third parties, acting on behalf of the Foundation. The use of the Foundation's name and logo should be used in a manner that complies with the requirements of this Code, in content and context.

7. Violation of the Code

The application and enforcement of this Code is primarily the responsibility of the Board. This responsibility then extends further to all Personnel.

Violation of this Code can result in disciplinary action, which includes the termination of employment and/or any contractual relationship between the individual and the Foundation. The degree of applied discipline relates in part to whether there was a voluntary disclosure of any ethical violation, and whether or not the violator cooperated in any subsequent investigation.

All Personnel shall disclose any unethical, dishonest, fraudulent, and illegal behaviour, or the violation of the Foundation's policies and procedures, directly to management or the Board. Personnel shall avoid gifts, gratuities, fees, bonuses, or excessive entertainment, with the aim to attract or influence economic activity, grants or donations.

The Foundation has a zero tolerance for corruption, harassment, bullying and discrimination. Corruption shall also mean bribes, kickbacks or similar remuneration or consideration received or given to anyone or organisation to attract economic activity, grants or donations.

8. Interpretation of the Code

If there is any doubt about the interpretation or application of this Code, in any given situation, then the Board should be approached to provide the necessary clarity.