

CODE OF CONDUCT

GREEN TRANSITION

**Implementing Industrial Emissions
Directive in Serbia 2021-2025**



**PLAYING
BY THE
RULES**



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Message from the Dean

The Faculty of Technology and Metallurgy of the University of Belgrade is the leading and the oldest accredited higher-education, scientific and research institution in Serbia and the region in the field of chemical technologies. A long and rich tradition of more than 90 years, world-recognized scientific results and reputation, as well as personnel and material potential of the Faculty, guarantee quality both in educational and scientific activities. With the aim of improving in scientific-research and expert work, the Faculty has established centres that contribute to the development in this field.

Cleaner Production Centre of Serbia (CPCS) started to work on September 1, 2007 within the Faculty of Technology and Metallurgy, University of Belgrade as its host-institution. The establishment of the CPCS was supported by the UNIDO and an official launching of the Centre was during the Sixth Ministerial Conference “Environment for Europe” held in Belgrade in October 10-12, 2007. Nowadays, the CPCS represents a Faculty department with specialization in resource efficiency and industrial pollution, working with number of educated and highly specialized national and international experts on different projects in Serbia and in the region. The CPCS offers a broad service portfolio, including, amongst others RECP trainings, plant assessments and audit services for companies, water and energy efficiency audits, IPPC consulting services and the like.

When we do business at the Faculty, we comply with the laws, regulations and policies established

by governments and international institutions. We have an utmost respect for the rule of law and expect of everyone involved in the projects we implement to share this respect. The present Code of Conduct is a set of rules, a source of direction and an ethical framework to support you when making important decisions during your engagement on the projects implemented by the Centre.



Yours sincerely,

A handwritten signature in black ink, appearing to read 'Petar Uskoković', written over a horizontal line.

Prof. Dr Petar Uskoković,

Dean of the Faculty of Technology and Metallurgy of the University of Belgrade

What is the Code of Conduct?

This business code defines general rules of business conduct for all employees on the Project and all persons engaged on contract basis at the Cleaner Production Centre of the Faculty of Technology and Metallurgy and the Project “Green Transition – Implementing Industrial Emissions Directive in Serbia 2021-2025” (hereafter referred to as employees). A Code of Conduct represents generally accepted obligations for all employees in the Project with an aim to get them acquainted with standards of business conduct and ethical norms, as well as business etiquette, they are obliged to adhere to when carrying out assignments.

The aim of the Code is:

- To contribute to execution of business activities in the spirit of business ethics, good business practices and principles of good faith
- To allow transparency of business operations.

Execution of business activities in compliance with requirements of business ethics and standards is part of business policy of each member of the Project Team.

Principles and rules of business ethics oblige all employees on the Project and all persons engaged on contract basis to perform certain activities on behalf of the Centre.

When signing employment contract or another contract of engagement on the job, the employee must be acquainted with the binding character of the Code, as well as sign a Statement pledging to this.

Employees who have doubts as to the interpretation or application of this Code should contact the Project Manager.

Each person to whom the Code applies is obliged to notify the Project Manager on the Code violation or on reasonable suspicion of violation having been committed by a person responsible.

Omission to provide timely information on the Code violation done intentionally or through gross negligence is regarded as the Code violation.

Our 10 rules



Professional execution of business activity



Avoidance of conflict between personal interests and those of the Centre



Execution of business activities in a way that does not jeopardize professional reputation



Conducting business activities in a manner which does not harm the associates



Health and safety always come first as well as wellbeing of our employees



Protection of all assets of the Faculty and prohibition of illegal actions



Use of approved budget to achieve business objectives



Execution of business activities in compliance with the regulations on protection and improvement of the environment



Non-disclosure of confidential business information



Complying with the standards of business ethics and contributing to the further promotion of morality in business relations



1. Professional execution of business activity

Ethical behavior in business activities is based on compliance with the laws, regulations, and contracts between business entities and social conventions.

It is not allowed to incite violation of the law and covering up of such violations.

Business operations of the Faculty and the Centre must comply with applicable laws and regulations of the Republic of Serbia. The Centre is obliged to provide timely, regular and reliable public information on its operations, with restrictions in compliance with the right to the protection of confidential information.

Fair public relations and cooperation with the media, competent authorities, professional associations and representatives of service users are an integral part of business strategy.

Professional dilemma

I have been hired as a consultant within the Project to assist the competent authority in the preparation of draft integrated permit. In the paperwork submitted to me, I observe a problem that can delay the issuance of a permit.

I am in doubt how to proceed:



I will keep silent about the problem, because it is only one paper that I can get later. It is more important to issue a permit.



I will report the observed problem to the competent authority and/or operator, even if it means postponing the issuance of the permit.

Project associates need to do their job impartially and objectively. All irregularities and problems observed during the preparation of paperwork for the integrated permit or draft permit should be recorded and communicated to the operator and competent authority the Project collaborates with. Withholding any information that may affect the permitting process or the conditions prescribed in the permit, as well as favoring any of the parties, shall not be allowed.





2. Execution of business activities in a way that does not jeopardize professional reputation

The employees of the Cleaner Production Centre are obliged to perform their professional duties with increased attention to the rules and practices of expertise – with professional diligence.

In exercising of their rights, the employees of the Cleaner Production Centre are obliged to refrain from actions that would impede execution of duties of the other side.

The Centre may set up a special body for public relations to disseminate information on the project. If no such body has been established, the Dean of the Faculty or Project Manager will be delegated for public relations. Employees shall not communicate with the media and give statements without prior notice of the Project Manager.

A Hard-truth

I am late with the submission of documents, the preparation of which is part of my assignment within the project. I do not know what to do, because I am partly responsible for that and I do not want to undermine my reputation in front of my colleagues and jeopardize potential future employability.

I am reflecting on whether:



I should keep silent about that fact and tell the Manager that everything goes as planned. I hope that everything will be miraculously completed on time.



I should tell the Manager that I am late and give a realistic estimate for the completion of the work.

From the project management aspect, it is always better to know the real situation. An honest answer can indicate the problems that were not identified at the beginning, thus allowing the Manager to provide additional time for the preparation of documents with a different organization of work.



In the modern business world, it is no longer enough just to be knowledgeable about your area of competence, but it is necessary to adopt the rules of business etiquette. Business etiquette does not differ much from the etiquette we have learned from our parents; yet, in the business world there are some specifics that we should pay attention to. Etiquette in verbal communication implies responsibility to the spoken, especially to the given word. Everything we say or state in public has a certain weight and significance. Business communication is a system or structure of adopted conventions that are voluntarily accepted, nurtured and developed. These are generally accepted rules of conduct (manners, dress code, greeting, behavior in a public place, principles, etc.). Given that we live in a time of widespread electronic media and continuous internet connection with an extremely large online audience, these rules do not cease to apply when we find ourselves behind the screen. As a general rule, topics such as political affiliations or religion that can lead to intensive emotional conflicts in case of disagreement, should be avoided. During the meetings, it is important to be ready, punctual and focused, do not let other commitments or calls disturb your meeting.





3. Health and safety always come first as well as wellbeing of our employees

Employees have the right to a clean, healthy and safe working space. Employees shall not be exposed to health and other risks unless they are duly given accurate information, training and insurance against such risks. The Faculty shall provide protection at work in compliance with the relevant regulations.

The Faculty is committed to always comply with national health and safety requirements, especially during the pandemic.

Personal data on employees is confidential information and enjoys special protection. Information on candidate employees can be used only for the purpose of employment. Employees have the right to be duly informed on procedures of gathering personal information and ways of their usage as well as their activities during the employment.

Employment information cannot be disclosed to third parties except for the purposes of any proceedings conducted before the competent authority and only based on official orders.

With its economic activities the Centre strives to contribute to social development and encourages employees to actively participate in social life.

Participation in social activities, with or without a fee, based on election or appointment, shall not be contrary to the policy against conflict of interests.

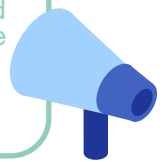
A day you can(not) miss

You have woken up this morning with a terrible headache, occasionally coughing and sneezing, and even the thermometer figures do not comfort you – your bodily temperature is 38 ° C. You have several important meetings scheduled for today, and you are afraid that your absence from work could affect the evaluation of your work. You are thinking of taking a couple of aspirins and head to work nevertheless.



Is it right to do so?

It is not a good idea to go to work if we feel bad and have the mentioned symptoms. Today, when we all fear for our health and for the health of the loved ones, we do not recommend coming to work with a fever. It does not matter if you have meetings within the Project Team or with other institutions, responsible behavior requires us to stay at home until we recover because we can potentially transmit the disease to others. We can reschedule appointments or hold them using digital tools. Responsible behavior saves lives!





4. Use of approved budget to achieve business objectives

The employee or a member of his/her family shall not offer, give, forge an appearance, promise or accept money, goods, rights, services, gifts of greater value or possibility to influence another person that is in business relation with the Centre.

Gifts of greater value are money, things, rights or services, as well as any other benefits obtained or received without paying the appropriate fee, or by paying much lower fee than the market price, or without proper counter service the value of which exceeds one half of the average monthly net salary in the Republic of Serbia.

Permission is granted to accepting and giving gifts of small value, unless accepting such gifts is not a condition for closing the deal or if it puts the donor in an advantageous position compared to competitors.

Accepting invitations for lunch or any similar proposals that are part of generally accepted business practice and which do not affect business decision, are allowed as an expression of politeness towards business partners.

An appropriate gift

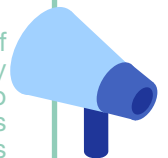
One of the directors of the company the Center cooperates with has sent you a couple of selected bottles of wine as a holiday gift.



Since it is clear that the value of this gift exceeds the standard value threshold, should I keep the gift or not?

Gifts that exceed the standard value threshold cannot be accepted. A gift of higher value is considered to be money, things, rights or service, as well as any other benefit obtained or performed without paying an appropriate monetary compensation, the value of which exceeds one half of the amount of the average monthly net salary in our country. It is necessary to be guided by the same rules when choosing gifts that you give, regardless of whether they are colleagues from the Center, or associates on the project that the Center is implementing. In the future, to avoid embarrassing situations, take the opportunity to timely communicate our code of conduct to the colleagues you closely cooperate with.

An invitation to lunch or any similar act of friendship that makes a part of a generally accepted practice that is considered not to influence business decisions, is allowed as an expression of courtesy towards business partners.





5. Non-disclosure of confidential business information

Persons employed in the Project and all other persons hired by contract to carry out activities on behalf and for the account of the Cleaner Production Centre are obliged not to disclose confidential business information which they have come across in performing the assignment.

Confidential information is any information or data whose unauthorized disclosure to third parties could harm the interests of the Centre or could be of use to competitors.

Information or data divulged in the proceedings before the competent authority is not considered confidential.

Confidential information includes information relating, but not limited to:

- negotiations, agreements with project partners, subcontractors and other persons as well as the Centre's business plans unknown to the public;
- research and further development, patents and innovation;
- data obtained from the operators or other institutions in the process of preparing relevant documentation for the Negotiation position or/and while collecting data for the preparation of draft integrated permits, as well as data shared by the Ministry of Environmental Protection and other institutions and projects;
- know-how;
- unpublished information about the services provided;
- unpublished financial and accounting information;
- sharing databases and other information on companies that are taking part in the project implemented by the Centre;
- other information the disclosure of which could affect the project.

Persons employed and hired in the Project are obliged to sign a statement pledging to comply with the provisions of the Code and pledging not to disclose confidential information to third parties. They are also obliged to ensure the protection of confidential information even after their employment or contract is terminated, they cannot make copies or retain any other documents containing confidential information upon contract termination and they are held accountable for the damage caused to the Centre if they do not comply with the law, regulations, and the Code in terms of information confidentiality, or their divulgence.

The act of giving information the disclosure of which is required under the law, and which are related to the violation of law and/or violation of good business practices and principles of business ethics is not considered as confidential information disclosure.

CPC Confidential

A representative of the company I work with asked me to provide them with an internal document of another company, because he knows that I also cooperate with it. Given the fact that they are involved in the same activity and have similar production facilities, he believes that this would make it easier for him to prepare the same document for their plant.



Is that allowed?

Submission of non-public documents is allowed only with the consent of the company or institution to which the document belongs, and provided that all data whose publication and sharing could in any way jeopardize the company's operations or cause damage have been removed from that document.





6. Avoidance of conflict between personal interests and those of the Centre

Prohibition of using confidential information and business opportunities for the private benefit.

Employees and members of their families shall not use confidential information and business opportunities to obtain material or immaterial gain for themselves or for related persons.

To meet the obligations of this Code, employees and their family members are not specifically allowed to:

- Use for personal gain the information they have obtained based on the position in the Centre;
- Use for personal gain business opportunities for which the Centre is interested or might be interested;
- Conceal information they have obtained based on the position in the Centre, but which may be important for making business decisions.

An internal conflict

I was hired as a consultant on the Project with a certain number of working days in a period of one year. My engagement in the Project also includes working with three companies. One of these companies offered me to be their external collaborator on several current environmental projects.



Should I accept the job?

If there is even the slightest possibility of overlapping activities on the current Project with future engagement in that company, the offer should not be accepted. The consultant may continue the cooperation with the company after the expiration of the contract he/she concluded with the Project, and on the positions for which he/she was not contracted (paid) by the Project. In exceptional cases, i.e., if the engagement is not related to the Project topic, the consultant may establish cooperation with the company while working on the Project, but with the prior notice and consent of the Project Manager.





7. Conducting business activities in a manner which does not harm the associates

Relations between employees shall be based on respect for human dignity and human rights.

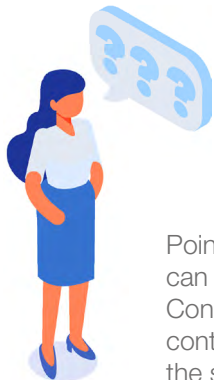
During the establishment of or in the course of employment, the persons to whom the provisions of the Code apply shall enjoy the same rights and shall not be restricted in exercising their rights regardless of gender, race, color, language, age, disability, sexual orientation, religion, national or social background, relation to any national minority, political or any other opinion, property, birth or other status.

Gender is not only about women – it is about the relations between women and men with different roles and unequal exercise of power. One of the aims of the Centre will be to promote gender equality and to ensure that women, men, male and female students have the same participation possibilities and benefits. The Centre will be paying attention to providing equal opportunities and rights during the Project implementation.

Being a part of the University of Belgrade, the CPCS in every activity applies the social and human rights policy that characterizes this institution. This Project, aiming at reducing the impact of pollution on environment and human health, is no exception to this approach as it defends the right to live in a clean and healthy environment and it promotes citizens' empowerment in the field of environmental protection. The employees of the Centre engaged in the Project activities need to pay constant attention to ensure that the Project's outputs and outcomes promote human rights in the development contexts.

Unacceptable reality

A colleague with whom I often visit companies leads very informal meetings that often involves telling inappropriate jokes that can clearly be perceived as sexist and offensive. I often feel uncomfortable because of that, because not only do such jokes insult me, but also other female colleagues from the companies we cooperate with.



What should I do?

Point out to the colleague that such jokes can be classified as violating this Code of Conduct, and ask him to stop. If such practice continues, inform the Project Manager about the situation.

No form of verbal or non-verbal abuse, bullying, inappropriate comments, harassment, or any other form of hostile conduct towards anyone is ever accepted, in or outside the workplace. For us, conspiring behind a person's back is equal to harassment. If arguments arise, they should be handled in an open and respectable way, and always face-to-face. No form of office politics is acceptable.





8. Protection of all assets of the Faculty and prohibition of illegal actions

Employees of the Centre are responsible for preserving, enlarging and rational use of the property. Appropriate legal proceedings shall be undertaken against the employee who intentionally or with gross negligence causes damage to the property.

Employees are responsible for conservation and rational use of things that make up the assets of the Faculty, and which are entrusted for executing the job.

Intellectual property of the Centre is an asset of utmost value and must be treated with appropriate care. As an employee of the Centre, you are likewise obliged to respect the intellectual property rights of others. Our policy is to never infringe the intellectual property of another company and to always obtain the necessary licenses and permissions before copying, using or distributing the intellectual property of others.

Employees must not:

- Damage or destroy documents that they know about or expect for them to be asked for by the competent authorities;
- Edit text of the minutes or other documents containing facts on business operations;
- Give false statement to the court;
- Put pressure on others to conceal or give false information that may be of importance for the further course of the proceedings;
- Use intellectual property of others without their permission.

“Just” one photo

Within the project, I was given a task to prepare a presentation for an online conference (webinar) that is to be recorded and which will be posted on the Project's YouTube channel. For the presentation, I selected a few images/photos from the Internet and I plan to use the data of the company I worked with within the project.



Can I do that?

For all public presentations and production of materials published in electronic or printed form during the Project, the use of data of the company with which cooperation has been established is possible only with the consent of that company. Moreover, images/photos and materials from the Internet should be used so as not to infringe copyright and intellectual property rights. Make sure that you have checked the restrictions and conditions of use in the description of the image/photo and material downloaded from the Internet, and act accordingly.





9. Execution of business activities in compliance with the regulations on protection and improvement of the environment

The employees of the Cleaner Production Centre support raising awareness on the importance of environmental protection through improving work process, system of scientific research and technological development, as well as, popularization of environmental protection.

The employees are obliged to fulfill commitments stipulated in the regulations on environmental protection and to apply and enforce prescribed standards of environmental protection, but also to find ways to reduce the environmental impact from each of their interventions.

The employees are expected to respectively take the following measures:

- To predict consequences of their business activities in relation to the environment and recognize them when making business decisions;
- To demand from business partners to adhere to the prescribed environmental standards;
- To inform the public and raise awareness on all issues related to the protection of the environment;
- To seek to deploy international experts from within the region;
- To maximize the use of local-hire expertise;
- To use video conferencing whenever possible and avoid unnecessary travel;
- To encourage reductions in paper copy document production, favoring electronic communication;
- To make efforts to recycle copy paper and copying in batches.

The Centre's capacity to manage the projects in an environmentally sustainable way, will be ensured also by the background and the experience of each project expert in the field of industrial pollution prevention, energy, resource efficiency and technologic improvement within projects implemented in Serbia and abroad. Building awareness and knowledge about the implementation of the highest environmental standards is an important part of every project implemented by the Centre.



10. Complying with the standards of business ethics and contributing to the further promotion of morality in business relations.

In establishing business relations and rights and obligations, employees are required to adhere to the principle of good faith. In all business relations employees are required to pay due respect and appreciation.

It is forbidden to exercise the right under business relations contrary to the purpose for which it has been legally prescribed and recognized.

The Centre values integrity, fair competition and transparency in all its activities and work actively with internal policies and procedures to fight corruption and bribery on every level. They include:

They include:

- Anti-corruption policy designed to (i) establish the key principles, requirements and procedures to prevent corruption which must be adhered to; (ii) ensure compliance with all applicable laws; (iii) determine an adequate procedure for the mitigation of corruption and bribery risks; (iv) ensure its continuous improvement by monitoring and assessing its impact;
- Procurement policy designed to (i) provide suitable procurement procedure and method of control; (ii) ensure transparency and fair competition during procurement process; (iii) achieve best value for money;
- Project specific code of conduct designed to (i) ensure integrity of candidate project experts, partner organizations and service providers; (ii) ensure high level of professional ethics and communication practices among them;
- Project specific business trip policy providing information on acceptable types of and limits on expenses occurring during traveling.

It is the Centre's duty to collaborate with competent authorities and take measures to determine whether employees have possibly violated the law.

The employee who is required to give evidence in the proceedings relating to the business activity is obliged to immediately inform the supervisor, unless it is a person authorized to represent the Centre before the authorities.

If you find yourself in a situation that may not be covered by this Code of Conduct, and if you think it could be potentially a corruptive one, ask yourself, “Is this moral? Is this in line with the values of the Project I am contracted for?” – As long as the answer to both questions is yes, you are on the right track. Otherwise, consider it your duty to express your concern to the Project Manager as soon as possible if you notice behavior or a situation that may constitute a crime, such as theft, fraud, assault, forgery, bribery or collusion, or that may pose a health or safety hazard of any individual.



