



# **Code of Ethics of the ECOM – Eurasian Coalition on Health, Rights, Gender and Sexual Diversity**

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## 1. General Provisions

1.1 Ethics are understood by us as a system of morals and values that are not related to the requirements of normative legal acts, but that are designed to ensure comfortable coexistence and create favorable conditions for cooperation, to maintain a health climate in communication, and to serve as a basis for making sound judgments about the acceptability or unacceptability of certain actions (or inaction), statements, or conduct.

1.2 This Code of Ethics (hereinafter 'the Code') contains a list of values and principles of the ECOM - Eurasian Coalition on Health, Rights, Gender and Sexual Diversity, proposes standards of conduct, norms and models of relationships in the Coalition, and establishes liability for non-compliance (or violations) with these norms and standards.

## 2. Purpose of the Code

2.1 Strict observance of the Code promotes organizational unity and ideological solidarity within our Coalition in balance with the necessary pluralism of opinions, contributes to the achievement of ECOM's mission, strategic objectives, and tactical and operational objectives, and strengthens the reputation of both the Coalition as a whole, as well as of individuals and organizations involved in ECOM's work.

## 3. Spheres and Subjects to which the Code Applies

3.1 This Code applies to:

3.1.1 Relationships between ECOM entities, including:

- 3.1.1.1 Organizations and individuals that are members of the Coalition;
- 3.1.1.2 Individual bodies and elected officials of ECOM;
- 3.1.1.3 The staff members of ECOM's Secretariat;
- 3.1.1.4 Consultants hired by ECOM;
- 3.1.1.5 ECOM sub-recipients.

3.1.2 ECOM as a whole and individual bodies of ECOM in their relationships with key communities and groups to which ECOM's activities are targeted.

3.1.3 ECOM as a whole and individual bodies of ECOM, when they act with reference to or on the basis of their organizational involvement with ECOM in relation to **third-parties**, which include the following:

- 3.1.3.1 Other civil society actors, regardless of country of location;
- 3.1.3.2 Government authorities, regardless of jurisdiction;
- 3.1.3.3 International, intergovernmental organizations;

- 3.1.3.4 Subjects of monitoring and research activities;
- 3.1.3.5 Mass media;
- 3.1.3.6 Subjects (organizations and individuals) who oppose the activities of ECOM.

3.1.4 Former elected officials and staff of the Coalition in cases where their statements or actions affect the Coalition;

3.2 The Code applies to all socially and professionally significant spheres, in particular to:

3.2.1 Business communication—internal and external, including collective PR and personal promotion;

3.2.2 Labor relations (in cases not mentioned in the agreements and rules that directly regulate them);

3.2.3 Activities carried out by the Coalition or with its assistance;

3.2.4 Creation and use of the intellectual property of the Coalition.

3.3 The Code does NOT apply to:

3.3.1 One's private life (friendly, romantic, and family relations);

3.3.2 Situations in which ECOM subjects cannot be considered to be representing ECOM (in particular, when ECOM subjects expressly state that they DONOT represent the Coalition in this particular case);

3.3.3 Situations that are comprehensively regulated by legislation (normatively), except when such regulations are clearly contrary to international approaches to human rights and freedoms and other international standards;

3.3.4 People who have a very indirect relationship to ECOM, including people who are members of organizations that are members of the Coalition, but do not represent their organization in ECOM, third parties.

#### **4. Values and Principles of ECOM and their Reflection in Approaches to the Practical Organization of the Coalition's Activities**

4.1 The following values and principles guide ECOM as a whole and individual bodies of the Coalition in their activities, as well as in their organization of the practical activities of the Coalition:

##### **VALUES**

4.2 Human Rights and Freedoms

4.2.1 Every person has, on an inalienable basis equal with others, rights as understood in the Universal Declaration of Human Rights.

4.2.2 Each person acquires a number of human rights at birth, in particular, the right to life, and cannot be arbitrarily deprived of such rights.

4.2.3 Every person has the right to protect and defend his rights and the rights of others, while making demands of the state in any jurisdiction where he or

the people whose rights he is fighting for are located.

4.2.4 Every person has the right to their own identity (national, ideological, religious/confessional and world-view, gender, sexual and any other identity), as well as the right to protect it, to demonstrate it in a socially acceptable way, or to abandon (or change) it.

4.2.5 Every person has the freedom of expression, even if such expression causes the emotional rejection of any other person. In the context of this Code, freedom of expression is regarded as acceptable in cases that do not conflict with the purpose of the Code as described in Section 2.

### 4.3 Human Dignity

4.3.1 Human dignity is an integral part of every person and is acquired by a person at birth.

4.3.2 A sense of dignity is necessary for every person to realize their own value (including self-worth), needs, and unique role in society.

4.3.3 The main manifestation of human dignity is self-esteem, which must be combined with respect for the dignity of other people, regardless of their individual characteristics.

4.3.4 Recognition of the dignity of each person underlies the principle of non-discrimination.

4.3.5 Judgments about cases where someone's dignity is offended must be made by third parties with a balanced and reasonable consideration of both the objective and subjective aspects of such a case. The unsubstantiated assertion of anyone about the insult or humiliation of his dignity cannot be considered by default as true.

### 4.4 Health

4.4.1 Health is understood by us as a state of the highest attainable physical (bodily and physiological) and mental (psychiatric) well-being of a person in combination with their social well-being, rather than just as an absence of infections, diseases, disorders, and physical defects.

4.4.2 The natural right to health of every person is understood by us as the objective opportunity to have the highest attainable level of health in combination with the ability to fully and comprehensively care for one's own health and the health of one's loved ones, regardless of sexual orientation, gender identity, skin color, beliefs, economic or social status, country of residence, or other circumstances that should not be considered as barriers to the right to health.

4.4.3 The right to health must be combined with the confidentiality (justifiably limited turnover) of information about the health of a particular person, regardless of whether he or she is currently healthy from a medical standpoint or is suffering from any health complications. In a number of cases, the realization of the right to health in a medical-social context should be based on the anonymity of the patient.

4.4.4 No health problem, whether it is a hidden (asymptomatic) infection, a transmitted or current disease, a past or current disorder, or a concealed or evident handicap, should be a factor in offending the dignity of a person or in the unfounded deprivation of human rights and freedoms, except when such actions are proportionate, fair, and objectively justified from the point of view of health requirements.

## 4.5 Reputation

4.5.1 We understand the reputation of ECOM to refer to the stable, generalized, average opinion of third parties about ECOM, which allows them to build their relations with the Coalition based on their reasonable expectations, both positive and negative. Reputation is a kind of intangible resource (asset), since ECOM's positive reputation, or "good name", attracts favorable and positive attitudes towards the Coalition on the part of stakeholders, ensures the initial trust of existing and new partners of ECOM, and inspires confidence in them about the success of current and future cooperation.

4.5.2 ECOM strives to maintain an irreproachable business reputation, which is achieved as a result of ECOM's activities as a whole and of the activities of its individual subjects (namely the members of the Coalition, the Steering Committee, and the Secretariat).

4.5.3 The planned efforts of ECOM to strengthen its reputation are considered ethical if they do not conflict with other values of the Coalition, and are based on the principles set forth below, to which the Coalition is committed.

## **PRINCIPLES**

### 4.6 Equality

4.6.1 Within the context of ECOM's work, equality is understood to mean the creation of equal conditions and equal opportunities for all ECOM members to voluntarily participate in the activities of the Coalition.

4.6.2 Equal opportunities for ECOM members should be balanced with the equality of their responsibilities.

4.6.3 When ECOM establishes qualification requirements for people performing any sort of functions, either internally or on behalf of ECOM (expert, representative, or other functions), such requirements should be developed in such a way as to not create excessive barriers and to not establish hidden preferences for certain categories of persons or specific people for their involvement in corresponding activities.

4.6.4 In certain situations where this is justified and objective, conditions can be created to guarantee the participation of certain categories of persons in certain processes that occur within the Coalition or in which the Coalition participates. In particular, this applies to minority target groups.

4.6.5 The following are NOT violations of the right to equality:

4.6.5.1 Determining priorities for resource allocation and financial assistance in relation to specific countries (or sub-national regions) in accordance with relevant procedures;

4.6.5.2 Providing disproportionate financial compensation to individuals for work performed for ECOM or for the provision of services contracted for by ECOM, taking into account the level of professional competence of such persons, the volume of the work performed and services rendered, and other objective factors.

4.6.5.3 Selectively inviting persons associated with ECOM to certain activities carried out by ECOM itself or with its participation (determining which participants to invite is at the discretion of the organizers).

4.6.5.4 Holding a certain event or publishing certain materials in a specific, prioritized language, whether it is Russian, English, or the national (state) language where an ECOM subject is resident (organizers have the freedom and discretion to determine linguistic priorities, however, this can be reviewed upon petition of stakeholders).

#### 4.7 Meaningful Participation

4.7.1 Every ECOM member has the right to participate in the work of the Coalition, but not arbitrarily, and only in accordance with the rules and procedures defined by the Coalition itself.

4.7.2 In the event that any member of the Coalition considers any rule or procedure ineffective, unjust, or otherwise contests its reasonability, this does not provide a basis for this member to violate the rule or procedure. However, the rule or procedure can and should be submitted by them for discussion within the Coalition to correct the situation by the decision of those bodies and/or officials of ECOM who are authorized to do so.

4.7.3 Each individual member of the Coalition and persons representing their organizations in the Coalition are called upon to personally take part in the work and to avoid delegating their functions to other people.

4.7.4 Management bodies and senior officials of ECOM are expected to fully take into account the positions of all who are legitimately expressing their opinion about a certain issue. However, in accordance with established rules and procedures, they have the right to make final decisions in contradictory situations, as this is the essence of the administrative functions entrusted to the management bodies and/or senior officials.

4.7.5 Members of the Coalition as a whole and members of the elected bodies of the Coalition have the right to independently make decisions about the extent of their involvement in the activities of ECOM, based on their own current priorities, time resources, and other circumstances.

#### 4.8 Fair Distribution of Responsibilities

4.8.1 As part of its activities and any cooperation, ECOM strives to ensure a balance between the rights and responsibilities of each of the parties involved, including a balance between the rights and responsibilities of members of the organization, between the rights and responsibilities of governing bodies, and between the rights and responsibilities of staff of the Secretariat.

4.8.2 Every subject of the Coalition assumes full responsibility either voluntarily or by legal consent.

#### 4.9 Inclusiveness and Openness to Cooperation

When planning and organizing its work, ECOM strives to create the conditions necessary to take into account the interests of each of its target groups, each of the countries represented in the Coalition, each individual member, and of each participating organization.

4.10 Mutual relations in the Coalition are based on trust and respect.

### 5. Ethical Declaration

5.1 We are people and organizations involved on a permanent or long-term basis in the work of ECOM. We set goals that are clear and understandable to each and every one of us, which we intend to achieve.

5.2 We act so that the reputation of the Coalition is strengthened and not doubted by third parties.

5.3 We work, focusing first of all, on the interests of our target groups, that is gay, bisexual, and other men who have sex with men, and trans people, ensuring inclusiveness towards each target group in all processes.

5.4 Our actions have a professional motivation that is clear and understandable for all those to whom they apply. We strive to improve any lack of professional competency through mutual consultations, proper training, mentoring, and other forms of sharing experiences.

5.5 The basis of our successful interaction is the achievement and maintenance of trust with one another, combined with attention to and respect for the interests and opinions of each person with whom we are in contact and work together, both within ECOM and externally.

5.6 We use proactive information, personal (two-way), and collective communication as a means of preventing possible risks and resolving problems. If a person causes a problem, but properly participates in resolving the issue, blame



cannot be subsequently placed on this person for this problem.

5.7 In case of complex, unforeseen, or conflict situations, we always maintain respect for those with whom we communicate in the course of carrying out our responsibilities, while maintaining the maximum possible emotional self-control.

5.8 We uphold a culture of personal and business communication that shows respect, goodwill, and the ability to seek a common language with each other, even in cases when our counterparty does not do so.

5.9 Manifestations of arrogant, contemptuous, or humiliating attitudes towards colleagues, ECOM members, staff of the Secretariat, or towards representatives of stakeholders is unacceptable. In cases where such occurrences take place, any person is entitled to immediately take the correct form of action to stop them.

5.10 We are guided by this Code when cooperating with partners, donors, and other external stakeholders.

5.11 We observe political correctness and gender sensitivity in all external and internal communication.

5.12 We will investigate any disagreement or conflict with the participation of people uninvolved in the situation, except in cases where this is required to immediately stop unethical conduct.

5.13 A substantive consideration of disagreements and investigation of conflicts can only take place in the presence of both (or all) parties involved. In other cases, proceedings must be stopped.

5.14 Members and subjects of ECOM can express their opinion on issues regarding the Coalition's activities verbally or in writing, however, the stated position should not contain significant distortions, deliberate exaggerations, nor should it be malicious or offensive to anybody in some way.

5.15 In any position we express, we strive to explicitly distinguish between facts and our own assumptions in order to avoid misleading colleagues. In the event that someone voices untruthful personal information while mentioning a person present, that person has the right to immediately offer a refutation or an explanation of his own position on the matter under consideration in accordance with the current regulations.

5.16 The authority of an ECOM member is based on competence, experience, and tact. No one can resort to methods of undue pressure exploiting official

subordination or factors of financial dependence.

5.17 In our internal and external communication, we avoid moralizing, do not condemn what we ourselves do not uphold, and do not demand of others what we ignore.

5.18 We are sensitive in discussing matters of a financial nature.

5.19 Constructive Criticism, Conflict Prevention and Resolution

5.19.1 ECOM members and subjects have the right to provide constructive and reasonable criticism to colleagues, which should be internal, and provided firstly via two-way communication with the person concerned, before being widely shared.

5.19.2 Criticism concerning the activities, decisions, and actions (inactions) of colleagues should not affect or offend their human dignity, and should not be based on facts, albeit negative ones, that are not related to the situation at hand.

5.19.3 The principles of criticism are validity, constructiveness, and tact.

5.19.4 The consideration of ethical conflicts and the search for ways to resolve disagreements that arise are initiated within the group of people affected by the specific situation. Discussion is conducted with all available information. If the group of people affected by this problem is unable to resolve the conflict or overcome the disagreement within a reasonable amount of time, one or more parties to the conflict may appeal to the Ethics Commission to resolve the conflict.

5.19.5 A temporary Ethics Commission may be established upon agreement of the affected parties to resolve ethical problems and conflict situations. Members of the Ethics Commission may include individual members of ECOM, persons representing ECOM member organizations, staff of ECOM's Secretariat, as well as external consultants provided they do not have a conflict of interest with regard to the situation under consideration.

5.19.6 In the discussion on any conflict situation, only such information that has been documented or that can be documented if necessary is taken into account. All other information is not taken into account.

5.19.7 The examination of any conflict situation should not provoke any violations of this Code by any of the parties. Any information obtained in violation of the requirements of this Code is not taken into account.

## **6. Liability for Noncompliance with the Code of Ethics**

6.1 Noncompliance with this Code includes:

6.1.1 Ignoring the provisions contained within it,

- 6.1.2 Intentional violation of the Code,
- 6.1.3 Actions, which are not specified in this Code, but clearly contradict it in spirit.

6.2 Failure to comply with the Code by any of the parties that are bound to it may subject them to criticism or proceedings in accordance with the rules and procedures established by this Code.

6.3 The Ethics Commission (regulations of the Ethics Commission are described in Section 7 of this Code) will consider any reports of non-compliance with the Code on a collegial basis, decide on liability measures, and will also implement amendments or additions to the Code in order to prevent similar situations in the future.

6.4 Liability for noncompliance with the Code includes the following measures, which are used in the order listed below for repeated occurrences:

6.4.1 Personally informing the subject about the first instance of their noncompliance with the Code with an individual explanation of the provisions of the Code;

6.4.2 A limited public warning for repeated noncompliance with the Code and informing the subjects whose interests were affected about the instance of noncompliance;

6.4.3 Upon decision of the by decision of the Ethics Commission and agreement with the Steering Committee, informing the General Assembly about the violation of the Code without identifying the subject (the subject guilty of the violation should not be named and should not be identifiable by third parties on the basis of the informatory message) in parallel with appropriate action with regard to the guilty party as provided for in subparagraph 6.4.2;

6.4.4 The same as above, but with an identification of the subject guilty of violating the Code;

6.4.5 Expulsion from ECOM membership;

6.4.6 Early termination of employment of an ECOM employee or consultant.

6.5 Recommended steps for resolving conflict situations

6.5.1 Identifying the parties (people) involved in the situation. Determining the extent of the conflict.

6.5.2 Coming to an agreement through discussions with the designated group of people on the proceedings and ways to resolve the conflict situation, including in-person meetings, remote communication, and the timing of each stage of the conflict resolution. Discussing measures to localize the conflict situation and to prevent further violations of the Code against the background of what has already happened.

6.5.3 Determining the subject of the conflict, agreeing on terminology, and preparing (collecting, documenting) the necessary information and facts.

- 6.5.4 Carrying out the necessary rounds of discussions about the conflict situation in accordance with the procedures agreed upon.
- 6.5.5 Compiling by the Ethics commission and comparing the advantages and disadvantages of various options (scenarios) for resolving the conflict through an organized discussion with documentation of the decisions taken.
- 6.5.6 Finding a final solution while taking into account the positions of all affected parties of the conflict. Documenting the decisions made, establishing timeframes for their step-by-step implementation, and naming those responsible for monitoring the timely implementation of each stage.
- 6.5.7 Developing recommendations for making amendments (or additions) to this Code in order to better prevent such conflicts in the future.
- 6.5.8 Making a statement that the conflict situation has been resolved, or, if this is not the case, deciding to hold a new round of conflict resolution attempts.

6.6 ECOM's Steering Committee, Board—Management Group, and Secretariat have the right to take into account recorded cases of noncompliance with the Code of Ethics when deciding on the election or appointment of certain persons to leadership positions within ECOM, when delegating authority to them to represent ECOM at any event or within other coalitions and consortia, when making hiring decisions, or in other cases when an incident (or incidents) of noncompliance with the Code may be considered a justified risk for the fulfillment of further tasks assigned to such persons; positive examples of compliance with the provisions of this Code should also be considered. Already existing legal agreements may be terminated in such cases.

## **7. The Ethics Commission**

### **7.1. General provisions**

- 7.1.1. The Ethics Commission (hereinafter referred to as "the EC") is formed by the decision of the General Assembly of the Eurasian Coalition on Men's Health (hereinafter referred to as "ECOM").
- 7.1.2. The EC is created as a structural subdivision of ECOM, is not a legal entity and reports directly to the General Assembly of ECOM.
- 7.1.3. Members of the EC perform their duties at no charge. In some cases, members of the EC may be compensated for direct expenses associated with the performance of their functions in the EC, such as travel costs, accommodation and food expenses in case of field work, when it is required by the circumstances.
- 7.1.4. In its work, the EC operates on the principle of the presumption of ethical innocence: no one is considered to have violated the Code of Ethics until such a violation is established by the decision of the EC.

### **7.2. Tasks and powers**

- 7.2.1. The main tasks of EC are:

7.2.1.1 ensuring compliance with the ECOM Code of Ethics by ECOM members, employees of the ECOM Secretariat, sub-recipients and consultants of ECOM (hereinafter referred to as "ECOM subjects");

7.2.1.2 making informed judgments about violations of the Code of Ethics;

7.2.1.3 resolution of ethical conflicts between ECOM subjects, as well as assistance in resolving such conflicts between ECOM subjects and third parties.

7.2.2. EC is authorized to:

7.2.2.1 consider appeals about violations of the Code of Ethics by ECOM subjects;

7.2.2.2 consider appeals about ethical conflicts between ECOM subjects, between ECOM subjects and third parties.

7.2.3. The EC is not authorized to independently initiate consideration of cases of violation of the ECOM Code of Ethics by ECOM subjects or ethical conflicts between ECOM subjects, between ECOM subjects and third parties, since the EC does not perform supervisory functions.

7.2.4. EC does not consider:

7.2.4.1 issues that are not in the field of ethics, including legal and financial relations between ECOM subjects or relations of ECOM subjects with third parties;

7.2.4.2 issues related to violation of the legislation of the Republic of Estonia as the place of registration of ECOM or the legislation of the countries of which ECOM members are residents;

7.2.4.3 issues falling within the competence of other bodies (structural divisions) of ECOM, with the exception of cases requiring joint consideration with the EC;

7.2.4.4 anonymous applications (however, the EC may consider applications submitted to it not anonymously, but under conditions of confidentiality, that is, on the condition of non-disclosure of the authorship of the application outside the EC).

7.3. The structure of the commission and the procedure for its formation

7.3.1. The EC includes individuals who are members or representatives of members (legal entities and initiative groups) of ECOM. The EC may also include invited participants from partner organizations and structures or independent experts who are not members of ECOM.

7.3.2. The composition of the EC is determined by the decision of the Steering Committee ranging from three to five people for the period of the upcoming term of the EC before the nomination of candidates to the EC.

7.3.3. Candidates for EC membership from among ECOM members are determined by self-nomination. Candidates who are not ECOM members and do not represent ECOM member organizations are invited by the ECOM Steering Committee, including upon nomination by ECOM members.

7.3.4. Members of the EC are approved by the General Assembly of ECOM using the method of ranked voting: each member of ECOM may vote for the number of candidates

that corresponds to the number of EC members determined by the Steering Committee. For example, if the composition of the EC is approved by the SC to be three members, and six candidates are nominated to the EC, then each ECOM member may vote for any three of these six candidates at their own discretion, but may also support fewer candidates or support no one. Only one vote may be given to one candidate by one ECOM member. Votes "against" are not collected or counted. Candidates for EC membership from among ECOM members or representing organizations that are members of ECOM vote on general grounds.

7.3.5. The period of activity of the EC is three years, its first day being the day when the results of the ranked voting are announced.

7.3.6. The operational management of the Ethics Commission is carried out by the chairperson/co-chairpersons of the EC, elected from among the EC.

7.3.7. Membership in the EC is terminated early:

7.3.7.1 upon application for resignation of a member of the EC;

7.3.7.2 in case of systematic failure to fulfill the duties of a member of the EC (a judgment on this is made by the remaining members of the EC and the corresponding decision is made by a majority vote).

7.3.8. In case of early termination of membership in the EC, additional recruitment of EC members is announced; new members are elected by the General Assembly using the same procedure as described above. The term of office of the additionally elected member of the EC is the same as the term of office of the EC to which such a person was elected.

#### 7.4. Organization of the commission's work

7.4.1. The work of the EC is carried out in the form of remote communication via the means that the EC itself agrees upon (by exchanging email messages, video conferencing, communication on social networks/messengers), and, if necessary, in the form of in-person meetings when circumstances require it.

7.4.2. Decisions of the EC are made by a simple majority vote of the EC members, in the absence of votes against.

7.4.3. The secrecy of voting is maintained – information about the vote of a specific member of the EC is not recorded and is not subject to disclosure.

7.4.4. To document its work, the EC may appoint a secretary from among its members.

7.4.5. The chairperson/co-chairperson of the EC or the secretary draws up and signs a protocol of work, which indicates the date (period) of consideration of issues, the means of communication, the list of EC members who participated / did not participate in the discussion, the list of issues considered and the decisions made on them.

7.4.6. The EC provides the General Assembly of ECOM with regular reports on the work carried out in the previous 12 months within a month following their completion. The last of such reports for the term of office of the EC is submitted in the last month of its activity.

7.4.7. The ECOM Secretariat provides logistical (technical) support to the work of the EC.

## 7.5. Rights and obligations of commission members

7.5.1. EC members are obliged to:

7.5.1.1 participate in the work of the EC;

7.5.1.2 consider applications regarding violations of the Code of Ethics and collectively make corresponding decisions;

7.5.1.3 observe the principles of impartiality and independence;

7.5.1.4 declare a conflict of interest and, if there is such a conflict, refrain from participating in the consideration of the corresponding issue;

7.5.1.5 not disclose confidential information that has become known to them in the exercise of their powers.

7.5.2. Members of the EC have the right to:

7.5.2.1 in case of non-participation for good reasons in the process of consideration of a particular issue by the Ethics Commission, express their opinion on such an issue in writing, which should be taken into account by the rest of the EC;

7.5.2.2 make a special judgment on a particular issue, different from the position of the EC as a whole (which in no way cancels the decisions made by the EC collectively);

7.5.2.3 refrain from participating in the consideration of a particular issue if it is impossible to maintain impartiality;

7.5.2.4 for a comprehensive analysis of the circumstances, request from ECOM subjects oral or written explanations, documents and other information regarding the alleged violation of the Code of Ethics;

7.5.2.5 develop recommendations based on the results of consideration of each situation;

7.5.2.6 propose changes to the Code of Ethics to the General Assembly of ECOM.

## 7.6. Procedure for checking violations of the ECOM Code of Ethics

7.6.1. Appeals regarding violations of the Code of Ethics or ethical conflicts are made in free form and sent to the email address [contact@ecom.ngo](mailto:contact@ecom.ngo) (marked "For the Ethics Commission") with a description of the situation.

7.6.2. The author of an appeal to the EC does not have the right to hide their identity, but has the right to send their appeal to the EC under conditions of confidentiality, that is, in such a way that the identity of the applicant is not disclosed outside the EC.

7.6.3. Applications received by the EC must be considered no later than 1 month from the date of receipt. When considering particularly complex cases, the issue may be considered within 3 months. At the same time, the EC strives to consider applications as quickly as possible, considering the primary commitments of its members.

7.6.4. The commission terminates consideration of the application if the applicant withdraws it in writing.

7.6.5. The EC notifies the ECOM subjects mentioned in the appeal about the appeal and sends a copy of the appeal.

7.6.6. Members of the EC, as part of the consideration of the appeal, may request from interested parties clarification on the matter of the appeal, documents and additional

information, if this is necessary for a comprehensive analysis of the circumstances.

7.6.7. The chairperson/co-chairperson of the EC agrees with the members of the EC on a date (period) for exchanging opinions and making a decision on the received appeal.

7.6.8. To participate in the analysis of a problematic situation, the EC may invite the applicant and those ECOM subjects that are mentioned in the appeal to clarify information, express their own position and/or resolve the situation.

7.6.9. In the course of its work to analyze the problematic situation, the EC hears and discusses the information received during verification of the appeal, arguments and explanations of interested parties and invited persons.

7.6.10. Based on the results of considering the application, the EC issues a conclusion on the presence or absence of a violation of the ECOM Code of Ethics. The conclusion of the EC based on the results of the consideration must contain confirmation or refutation of the fact of a violation of the Code of Ethics or an ethical conflict, reasoned conclusions, necessary proposals and recommendations.

7.6.11. All interested parties, as well as those bodies or structural divisions of ECOM that are affected by the problematic situation, are familiarized with the conclusion. If possible, the EC refrains from bringing information about ethical conflicts to the level of those bodies and subjects of ECOM that are not affected by this situation, guided by considerations of corporate expediency, weighing both the positive and negative consequences of disclosing information about an ethical conflict or violation of the Code of Ethics.

7.6.12. If a violation of the Code of Ethics is confirmed or if a conflicting ethical situation arises, the EC makes recommendations in accordance with clause 6.4. of this Code.