



Research for a better future

Code of Conduct

EXTERNAL

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1 Preface

The Institute for Energy Technology Foundation pursues a range of activities related to research and development (R&D), radiopharmacy and the operation and safety of nuclear facilities. We are obligated to comply with a number of legal statutes, regulations and norms. IFE has a management system that defines roles and responsibilities within the organisation, as well as guidelines and systems that ensure compliance with these regulations.

The society around us has expectations of IFE's activities and of the behaviour of each of us. The trust in IFE is something that you as an individual and we as an organisation must help to preserve.

All of us come up against ethical challenges in our daily work, in our relationships with colleagues and in our contact with the authorities and clients. We can be faced with concrete issues where we need to make difficult choices, where what is right and wrong may not always be obvious.

IFE wants to have a corporate culture where ethical problems and grey zones are discussed openly, a culture where addressing concerns and searching for clarity in ethical dilemmas are accepted.

IFE's Code of Conduct provides general guidelines for our behaviour.

Corporate ethics is a management responsibility, but we all have a personal responsibility to act in an ethically sound manner.

Kjeller, 1 July 2020

Nils Morten Huseby

President

2 Scope

The foundation's objective is *'on a non-profit basis and for the benefit of society to undertake research and development in the area of energy and other areas where the foundation's competence is especially suitable, as well as other activities associated with this, including collaboration with, participation in and ownership of other enterprises and organisations.'*

IFE's Code of Conduct should promote the achievement of the foundation's objective through the responsible management of activities. IFE undertakes to maintain a high ethical standard and shall operate in a way that reinforces the safety culture and promotes a good business culture in all areas where the enterprise operates. The Code of Conduct applies to the IFE Foundation and enterprises in which IFE has a controlling interest. The Code applies to all employees and managers, as well as contract workers and personnel involved in research and teaching activities, and elsewhere as agreed.

All those covered by the Code of Conduct have a duty to familiarise themselves with all legal statutes, regulations, guidelines and instructions that apply to the activities in which they are involved.

The monitoring of compliance, training and use of ethical guidelines shall be incorporated into the foundation's internal control.

2.1 General guidelines for our conduct

- We shall comply with all legal statutes, regulations and other binding norms applicable to our activities and the work we perform.
- We shall be a transparent organisation with the highest possible degree of openness.
- We shall meet all obligations to which we have committed.
- We shall put health, safety and the environment first.
- We shall assume corporate social responsibility and not act in ways that could harm society's trust in the foundation and the role of research.
- We shall respect human rights.
- We shall help build a fair and inclusive working environment that does not discriminate on the basis of ethnicity, gender, sexual orientation, religion, political affiliation or social background.
- We shall not ask for, accept or mediate bribes, neither for ourselves nor on behalf of others, nor abet or engage in money laundering, fraud or embezzlement.
- We shall exercise due care in our choice of cooperation partners and suppliers.
- We shall address conflicts of interest according to the 'four eyes principle' and exercise particular due care in situations where we fill multiple roles, and distinguish between the interests of the foundation on the one hand and our private interests on the other.
- We shall safeguard the foundation's material and intellectual property.

2.2 Breaches of the Code of Conduct

IFE does not accept violations of applicable legislation or the Code of Conduct. Alleged irregularities may be investigated by internal auditors or by other internal or external resources. Depending on the degree of intent and severity, IFE may initiate disciplinary measures, terminate the employment contract or report the issue to the relevant authorities if employees breach the Code of Conduct or applicable legislation. The same applies to managers that disregard or tolerate such breaches.

If our contracting parties, including third parties associated with these, act in contravention of IFE's Code of Conduct, this will constitute a material breach of contract that entitles IFE to terminate all current contractual relationships. The contracting party shall indemnify IFE from any loss or harm that may arise from such termination.

3 Responsibility for ethics

3.1 Responsibilities of the board of directors

The board of directors has a general duty to ensure that the foundation's objectives are upheld, to govern the foundation in an appropriate manner and provide for appropriate organisation of the activity.

The role and remit of the board of directors is to establish instructions for day-to-day management and monitor the ongoing management and the activities in general to ensure that the board's instructions have been implemented as intended. IFE's Code of Conduct shall be endorsed by the board.

3.2 Responsibilities of the president

The president is responsible for the day-to-day management of the enterprise and shall comply with the guidelines and instructions that the board of directors has laid down for the administration and organisation of the activities.

The president is responsible for organising the enterprise in a way that facilitates appropriate and ethical operations.

The president shall organise training in ethics and implement a system to document completed training activities and monitor compliance with the guidelines. The president shall appoint IFE's Ethics Committee.

3.3 Responsibilities of managers

All those who have managerial roles are responsible for exercising their managerial function in line with the board's instructions and the foundation's guidelines.

The key role of managers with regard to ethics is to act as role models in ethical issues and establish an internal working environment where employees can raise and discuss ethical issues. Voicing concerns and raising criticism shall be accepted without any risk of reprisals against employees who express such concerns.

Managers are responsible for channelling ethical issues to IFE's Ethics Committee if the matter cannot be resolved in the line organisation. The manager is responsible for doing this in due time.

Managers with HR responsibility have a duty to take action as quickly as possible when learning about potential wrongdoing that involves employees in their own unit. The managers must contact the parties involved to establish the facts of the matter. If the matter concerns the working environment, the safety delegate and/or the trade union representative shall be involved.

Managers are responsible for ensuring that training courses in ethics are held for all employees and that the employees comply with the guidelines. Managers have a responsibility to supplement the training in ethics to ensure that it encompasses disciplines or job tasks that require special knowledge of ethical problems that may arise and how they should be addressed.

Managers in the research sectors shall ensure that all research is undertaken in line with recognised research ethics norms.

Managers shall notify IFE's Ethics Committee if they become aware that the guidelines, training or procedures are inadequate or fail to have the intended effect.

3.4 Responsibilities of individual employees

Irrespective of their role in the organisation, each employee is responsible for familiarising themselves with and acting in compliance with IFE's Code of Conduct and participating in ethics training. All employees have a duty to report breaches of prevailing legislation and/or the Code of Conduct.

Employees shall ensure that they always act in accordance with applicable legal statutes and regulations, and well within the limits of IFE's ethical requirements. In case of doubt, they shall raise the matter with their superior or the Ethics Committee, and be transparent about any ethical issues. If the law differs from IFE's Code of Conduct, the most stringent provision shall apply.

All employees shall be vigilant and inform their immediate superior of issues that could potentially give rise to conflicts of interest, and shall

- not give, accept or pass on gifts or benefits that could influence the decisions that they make in their work. Local customs and gestures of politeness should, however, be taken into consideration. Receipt of any gifts or benefits shall be reported to the immediate superior and handled in conformity with IFE's regulations for gifts.
- not participate in travel or events paid for by suppliers, cooperation partners or competitors without prior agreement with IFE.
- not hold office or accept research commissions outside the foundation without prior agreement with IFE.
- not possess shares or share options in enterprises that are clients of or suppliers to IFE or IFE's clients without prior agreement with IFE. Information shall be provided to the immediate superior upon employment or when shares/options are acquired during employment. This does not apply to minor blocks of shares in listed companies or investments in securities funds.
- inform IFE of work-related board positions upon employment and clarify the situation with the immediate superior before accepting work-related board positions during employment.

- not participate in the deliberation of issues that have implications for themselves or persons close to them if the employee in question can be considered to have a personal or financial vested interest in the issue.
- not have persons close to them as their immediate superior.

During travel and hospitality related to work outside IFE's facilities, IFE employees are representatives of the foundation and shall

- show moderation in their use of alcohol
- refrain from the use of narcotic substances
- refrain from purchasing sexual services

4 The Ethics Committee

IFE has established the Ethics Committee, which shall make statements, provide guidance and give advice to IFE's president and employees on ethical matters. IFE's Ethics Committee shall assess issues pertaining to research integrity pursuant to Section 6 of the Research Ethics Act and advise the president as to whether issues should be forwarded to the Research Integrity Committee of the Association of Norwegian Research Institutes and/or the National Commission for the Investigation of Research Misconduct.

Based on IFE's Code of Conduct, the Ethics Committee shall help raise awareness of ethical dilemmas and promote ethical conduct for all employees. All employees can submit issues to the Ethics Committee, which shall deliberate these issues in accordance with its mandate and process.

5 Responsible management

5.1 Subject to Norwegian law

The IFE foundation shall be organised and localised in accordance with Norwegian law.

5.2 Interaction with partners and other contracting parties

IFE shall exercise due care in its involvement with partners, customers and suppliers. All cooperation agreements, work contracts and procurement contracts that IFE enters into must comply with IFE's Code of Conduct.

5.3 Corruption, money laundering, fraud, embezzlement and use of intermediaries

Corruption, trading in influence, money laundering, fraud and embezzlement are punishable offences under Norwegian law. IFE's employees and contracting parties must not commit or participate in criminal acts.

If IFE's personnel are offered, or if they demand, receive or accept anything that could be perceived as advantageous in terms of influencing the exercising of their own or another party's position or office, or the execution of their work, this must be reported immediately to their immediate superior. This applies both in Norway and abroad. All employees have a duty to report any suspicions of such activity internally, through IFE's anonymous channel for reporting concern if appropriate.

As a general rule, IFE does not use consultants, agents or other intermediaries to channel assignments and payments. Where the use of agents or intermediaries is necessary for the work, this must be in line with IFE's internal guidelines.

The rules may be deviated from if there is a risk to the safety, health or life of an employee or others. The employee's immediate superior must be informed as soon as possible.

5.4 Export control, trade restrictions and sanctions

IFE shall not export goods, technology, services or materials that can be used for military purposes or contribute to strengthening another nation's military capability without an export licence from the Ministry of Foreign Affairs.

IFE shall comply with nationally applicable sanctions and trade restrictions at all times. In cases of uncertainty, we will enter into a dialogue with the relevant authority for clarification and obtain updates on the international situation and on regulatory changes.

5.5 Corporate social responsibility and guidelines for ethical trade

IFE endeavours to promote good working and environmental conditions in our supply chains through close cooperation and dialogue with our suppliers and partners. In order to clarify our expectations of suppliers, we have drawn up ethical trade guidelines. The guidelines cover basic requirements for human rights, workers' rights, the environment and anti-corruption in the supply chain.

5.6 Accounts and reporting

IFE's business information shall be communicated precisely and fully both internally and externally. All accounting information must be correctly recorded and reproduced in accordance with the statutory and regulatory framework, including relevant accounting standards. Any act that intentionally leads to misrepresentation in the accounting material will be treated as fraud.

5.7 Fair competition

IFE acts honourably and ethically within the framework of current competition rules in the markets in which we operate. We do not engage in price collusion or market splitting.

5.8 Relationship with the authorities

IFE shall have a close and open relationship with the authorities. This entails the following:

- We comply with licence requirements and orders.
- We establish a level of security based on the risk profile in cooperation with relevant authorities.
- Where interpretation of a requirement is ambiguous, we clarify this with the relevant authority or use the interpretation that is most in keeping with the aim of the requirement.
- We consider national and international regulatory supervision as a resource.
- We have regular dialogue with authorities that are central to IFE's activity.

The contact with the authorities shall take place through IFE's management and those who have been delegated authority by virtue of their position or to follow up particular tasks.

5.9 External communication

Open, honest and accurate communication is crucial for IFE's integrity and reflects our role in society.

Only persons with authority from the president are permitted to speak to the media or post content on social media on behalf of IFE. All of IFE's employees must comply with the duty of confidentiality in their private use of social media, and have a responsibility to use social media in a way that does not damage IFE's reputation, business interests or create a security risk.

IFE's researchers must adhere to the research norms on integrity, transparency, quality and accountability. IFE's researchers are encouraged to participate in public discourse and the shaping of framework conditions for research, innovation and value creation where a research basis exists.

IFE's employees:

- shall not speak on behalf of IFE without authorisation from the president or director of communications
- shall, in cases where their title or position at IFE is to be used in the media, clarify with their manager whether a statement is contrary to IFE's interests
- shall be careful not to apply their professional authority beyond their own specialist area and for expressing themselves as a private individual.

6 Reporting concern

IFE endeavours to facilitate a corporate culture that encourages the reporting of concern.

Reporting concern is defined as situations that are in conflict with the rule of law, IFE's guidelines or ethical norms that are generally accepted in society, for example situations that may involve the following:

- Risks to life or health
- Risks to the climate or environment
- Corruption or other financial crimes
- Misuse of authority
- Unsafe working environment
- Breach of personal data security
- Breach of research ethics norms

Claims about situations that only apply to the employee's own working conditions are not regarded as the reporting of concern, unless the matter is covered in the points above.

Everyone has a duty to report criminal matters and situations that represent a risk to life or health.

6.1 Procedure for reporting concern

Employees can always report concern to an internal representative of the employer, a public supervisory authority or other public authority.

There are no formal requirements for the content of reporting concern, but the matter must be explained in as much detail as possible and the following must be included as a minimum:

- Name of the person reporting concern
- What the concern entails
- Parties involved
- Date and time the matter occurred
- Any documentary evidence
- Any witnesses

Internal reports of concern should be emailed to varsel@ife.no. IFE's internal channel for reporting concern is administered by the HR department, which will ensure that the report is investigated in due time.

IFE has made provisions for the anonymous reporting of concern through an agreement with an external firm of solicitors.

6.2 Follow-up of reports of concern

IFE's management shall ensure that all reports of concern are followed up and are in accordance with the Working Environment Act and IFE's procedure for dealing with such reports. If the person reporting concern is known, they will receive written feedback, normally within two weeks. When a report of concern is received, a preliminary investigation may be necessary in some cases in order to clarify whether the matter should be processed in accordance with the procedure for reporting concern, whether it is a matter for the Ethics Committee or whether it is a personnel matter that needs to be handled in a different way. When it has been clarified that the matter is to be dealt with in accordance with the procedure for reporting concern, clarification then needs to be established on whether the matter is to be investigated internally by an impartial team or whether it is appropriate to engage external investigators.

In addition to the claim of concern, information must be obtained that sheds light on the matter from several sides. The description of the facts shall provide a basis for assessing whether there has been a breach of laws, norms or rules. Based on this assessment, a report shall be prepared which also discusses possible solutions for rectifying any unacceptable actions. The person who reported the concern will not necessarily be a party to the case or have access to the case documents, but they will be notified of the outcome once the matter has been settled.

Reports of concern and any sanctions are, in principle, confidential, but this can depend on the nature of the case. Confidentiality is mutual, and the person reporting the concern must not discuss the matter with third parties.

If the report of concern proves to be unfounded or based on a misunderstanding, the person reporting the concern shall be informed of this in writing.

The person suspected of unacceptable actions shall be given access to the details of the case and the opportunity to explain him/herself. IFE's management is responsible for ensuring that anyone suspected of breaching the law or guidelines is not mistreated.

Reporting concern must not have negative repercussions for the person reporting the matter, and IFE shall ensure that they are not subject to retaliation. Retaliation is defined here as any unfavourable treatment, practice or omission that is a consequence of or a reaction to an employee reporting concern, such as:

- threats, harassment, unjustified discrimination, social exclusion or other improper conduct
- warnings, changes to work tasks, relocation or demotion
- suspension, termination, summary dismissal or disciplinary action

Reference is also made to the Norwegian Labour Inspection Authority's [factsheet](#) on reporting concern and the chapter on reporting concern in the [Working Environment Act](#).

7 Research ethics

All IFE's research activity must be carried out with a high degree of integrity and scientific quality, based on recognised research methods and in accordance with national and international standards. Research work shall adhere to the ethical guidelines for research by the Norwegian National Research Ethics Committees (<https://www.etikkom.no/forskningsetiske-retningslinjer/>).

IFE shall comply with the principles of academic freedom and responsibility for ethical research in line with the 'Guidelines for public basic funding for research institutes'. This means that IFE shall help ensure that the principles of academic freedom are applicable to all publicly funded research conducted by researchers employed at the institute, provided this does not conflict with the employer's management prerogative.

Researchers shall have the freedom to ask questions, also in relation to what is considered to be established knowledge and understanding. They must also have the greatest possible freedom to express themselves publicly about their research, the freedom to promote new ideas and to choose the method and material for their research and development work within the framework of their employment contract, project descriptions or other special agreements.

Researchers employed at the institute shall, as a general rule, have the right to publish their results, and shall ensure that publicly funded work is published. When research is partly funded by the private sector, publication procedures must be clarified before a contract is entered into, and included in the contract. If publication will be a barrier to the protection or commercial exploitation of the results, publication may be postponed.

IFE is responsible for:

- ensuring that the research is conducted in accordance with recognised research ethics norms
- promoting good research ethics, including supervision and training in research ethics
- preventing and dealing with suspected breaches of norms
- giving employees the option to decline participation in projects that are incompatible with their ethical values.

7.1 Research practices

Research work entails a significant degree of freedom and trust, and the individual researcher therefore has to take personal responsibility for their work. Pursuant to Section 4 of the Act concerning the organisation of work on ethics and integrity in research of 2017, the individual researcher has a duty of care when planning, carrying out and reporting on a research project, as well as other research-related activities.

The duty of care means that all researchers involved in research have an independent responsibility to familiarise themselves with and adhere to recognised research ethics norms. Everyone working in research should be aware of the rules on confidentiality, data protection and data ownership regulations, including intellectual property and copyright rules. Everyone who works in research must also have knowledge of norms and rules for co-authorship and good referencing practices, and must credit other researchers' work and their own earlier work when new knowledge and new understandings are based on this.

Employees involved in R&D shall

- work to strengthen and manage the confidence placed in them by the Norwegian and international communities
- have an independent responsibility to familiarise themselves with current legal requirements and research ethics guidelines
- have knowledge of the Norwegian National Research Ethics Committees' ethical guidelines
- participate in IFE's research ethics training
- not engage in activities that may violate laws, IFE's Code of Conduct and procedures
- not undertake research work that is incompatible with general morals and respect for the dignity of the individual
- have an independent responsibility not to accept fraudulent research practices either on their own behalf or on behalf of others
- not manipulate research results, even under pressure
- practice good referencing ethics and not take credit for other researchers' work
- when in doubt about a matter, discuss this with their immediate superior or present the case to IFE's Ethics Committee

7.2 Academic publication of results

Research results should be published in academic journals to the greatest extent possible. Everyone must respect the contributions of others and follow established and relevant standards for authorship and collaboration as referred to by the Norwegian National Research Ethics Committees.

Employees involved in R&D shall:

- reference all sources used
- name all co-authors.

In order to ensure rightful authorship or co-authorship, IFE's employees must:

- clarify authorship as early as possible in the process in order to avoid conflicts and misunderstandings
- have made a significant contribution to at least two of the four components of a typical research project:
 - concept or design
 - data collection and processing
 - analysis and interpretation of data
 - written formulation of substantial parts of the work
- have critically reviewed various drafts and approved the final version
- be able to defend the work in its entirety (although not necessarily all of the technical details).

Contributions to research projects that do not qualify for authorship should be recognised in the acknowledgements section.

7.3 Scientific misconduct

Scientific misconduct is defined as falsification, fabrication, plagiarism and other serious violations of recognised research ethics norms that have been committed intentionally or with gross negligence in the planning, conducting or reporting of research, cf. Section 8, second paragraph of the Act on Ethics and Integrity in Research.

IFE is responsible for dealing with cases of possible breaches of recognised research ethics norms.

Where questions arise as to whether research at the institution is being conducted or has been conducted in accordance with recognised research ethics norms, the matter is submitted to IFE's Ethics Committee, which gives its recommendation to the president, including an assessment of whether the matter should be reported to the Research Integrity Committee of the Association of Norwegian Research Institutes and/or the National Commission for the Investigation of Research Misconduct. The president can also decide to set up an internally or externally led investigation to clarify the situation.

IFE shall report possible serious breaches of recognised research ethics norms to the Investigation Committee – National Commission for the Investigation of Research Misconduct, cf. Section 6, fourth paragraph of the Act on Ethics and Integrity in Research. The reporting obligation is limited to cases of a more serious or principled nature. In cases where reporting is deemed appropriate, this should be carried out as soon as the matter has been finalised at the institute.

8 References

The following national and international standards, guidelines and legislation have been used when drawing up IFE's Code of Conduct.

- Lov 2005-06-17 no. 62: Act relating to working environment, working hours and employment protection, etc. (Working Environment Act)
- Lov 1967-02-10 no. 00: Act relating to procedure in cases concerning the public administration (Public Administration Act)
- LOV-2017-04-28-23 Act concerning the organisation of work on ethics and integrity in research (Research Ethics Act)
- LOV-2006-05-19-16 Act relating to public access to documents in the public administration (Freedom of Information Act)
- The Act of 15 June 2001 relating to Foundations (Foundations Act)
- Lov 1998-03-20 no. 10: Act relating to protective security services (Security Act)
- Halden Reactor Project Human Studies Review Committee, QA-P-271: Human Participants Protection Procedure.
- Ethical guidelines for research issued by the Norwegian National Research Ethics Committees <https://www.etikkom.no/forskningsetiske-retningslinjer/>
- The Norwegian Register for Scientific Journals, Series and Publishers <http://dbh.nsd.uib.no/kanaler/>