CMI Code of Ethics and Integrity

Contents

General

The goals of the Chr. Michelsen Institute (CMI) require that all who work for the institution observe the highest standards of professional ethics. The Code of Ethics and Integrity sets the standards by which all staff at CMI and participants in CMI's research and consultancy projects must apply and is an integral part of CMI's system for governance, management, financial control and reporting.

CMI shall conduct its business with integrity, respecting the laws, cultures, dignity and rights of individuals in all countries where we operate. CMI is obliged by law to exercise fair labour practices and to maintain a safe and healthy work environment for the staff. CMI urges to have a diverse staff when it comes to gender, nationalities, beliefs, family relationships, or backgrounds. Fair treatment of all staff is essential, and all shall be given equal opportunities. CMI strive to arrange for good work-family balance, according to the individual's situation.

CMI will respect the human rights of those affected by its activities in accordance with international human rights instruments and standards. CMI will abstain from any improper involvement in local political activities

CMI's Code of Ethics and Integrity shall apply to all our activities. We will seek to ensure that our partners adopt similar commitments in connection with common projects. This Code applies to all employees (including temporary personnel) and directors in CMI. It also applies to intermediaries, consultants and others who act on CMI's behalf.

Conduct

CMI's employees shall expect a workplace free from harassment and discrimination. We do not tolerate discrimination against any employee on the base of age, gender, sexual orientation, disability, race, nationality, political opinions, religion or ethnic background, or any other basis prohibited by law.

Comments or any other forms of offensive messages, derogatory remarks or inappropriate jokes are unacceptable.

CMI staff are obliged to behave properly in all situations while representing CMI, no matter what the circumstances are. This includes amongst others public appearances, project cooperation, get-togethers, and other situations where CMI in any way is concerned or represented. This also is valid on travels. All our staff shall maintain a respectful tone between and about colleagues and clients in all personal encounters.

Harassment in any way is not acceptable, be it gender-based, between groups of staff, improper behaviour (eg sexual harassment, bullying, discrimination in any way), or any other way. In response to the high public awareness on sexual harassment (the #metoo-campaign), the institute has taken a clear stand in recognizing the importance of the issue, communicating the internal procedures for whistle-blowing and developing internal procedures for how to handle such cases.

Research ethics

The purpose of this section is to assist individual researchers as well as CMI as a whole to develop ethical discretion, reflection, to clarify ethical dilemmas and to pursue good scientific practice and reduce the risk of misconduct. In conjunction with the ethical guidelines developed by the National Committee for Research Ethics in the Social Sciences and the Humanities (NESH), this section shall be used as a tool in

assessing individual cases, in evaluating the ethical aspects of research projects and when reporting and disseminating results and findings.

Research ethics refer to a variety of values, norms and institutional arrangements that help regulate scientific activities. Research ethics is a codification of scientific morality. While dealing mainly with the research process, research ethics apply also to teaching and student supervision, publication of findings, expert advice and the management of institutions.

Broadly speaking research ethics cover four main spheres: (1) General ethics of research, (2) respect for individuals, groups and institutions and (3) responsibility towards the research community and the public. The NESH guidelines provide a more general discussion of research ethics.[1] Below, we highlight some aspects of the ethical guidelines by NESH that deserve particular attention in the context of CMI's research and operational environment.

General ethics of research

Norms and values of research: The most critical principle of science is the pursuit of truth. While research can never fully achieve this goal, this principle has intrinsic value itself. Different academic disciplines and approaches may arrive at different, yet reasonable interpretations of the same material. An explicit reflection on assumptions and limitations of the chosen approach are paramount.

- *Question you can ask yourself:* Can I defend the interpretation of my results and the presentations of my findings with a reasonable set of assumptions? Am I explicit about the limitations of my research?

Freedom of research (p. 33): In a politicized and economized world like ours, all researchers shall take a clear stance to preserve the freedom and independence of research, especially when the topic is controversial and polarized or when political, strategic and commercial considerations impose pressure and constraints on research.

- *Questions:* Do I feel that conflicts of interest affect the integrity of my research?

Respect for individuals and groups

Human Dignity and avoidance of harm: Researchers must always respect the dignity of individuals by protecting personal integrity, preserving individual freedom, respecting privacy and family life and avoiding harm and unreasonable strain. Research involving vulnerable groups (e.g., refugees and displaced persons, victims of violence, minorities), exposed groups (e.g., opposition politicians, regime

[1] The guidelines are available at https://www.etikkom.no/en/. For research of medical or health related character there are specific ethical guidelines, herewith collecting necessary approval from Regional Committees for Medical and Health Research Ethics (REK).

critics, anti-establishment social movements) must take measures to avoid negative repercussions for on research subjects. In autocratic, regimes even speaking with a foreign researcher may bring research subjects into precarious situations. Besides, we need to make sure that our collaborators, assistants, and staff enjoy the same degree of protection.

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- *Questions:* How does my research affect the well-being of participants? How can I mitigate any adverse effects? Shall I consider a more indirect approach?

Privacy and data storage: From a legal perspective and in particular in the current public debate, the protection of privacy is mainly linked to the collection, analysis and publication of personal data. However, privacy also has broader implications and researchers shall exercise caution and restraint when dignity, self-respect and other important values are at stake, when individuals have impaired or absent capacity, when individuals agree to be observed or share their opinions and when either participants or communities are identifiable as research objects.

Data related to identifiable individuals must be stored responsibly. Such data must not be stored any longer than what is necessary to achieve the objective for which it was collected. Data stored must not be identifiable, i.e. identifiable information (e.g. names, addresses, email) must not be stored with other personal information and responses.

Information and consent: What is the purpose of your research? Why does it matter? What will you do with it? These are questions we are used to address in research proposals and academic writing, but research subjects are often given minimal standardized information. Inform your informants, interview partners and collaborators about your research aims, the funding source, the intended use of the results and the (non)consequences of participation in the research project. This information should be provided in a neutral manner that does not lure individuals into taking part although they may prefer not to.

The information needs to be followed by an explicit consent by the participant. Whenever you collect personal data, values, preferences, opinions and behavior you must seek permission, i.e. consent, by the individual. Consent must be given freely, informed and in an explicit form.

- *Question:* Is the information provided clear? Are informants informed about the consequences of participating, i.e. whether any future development investments are or are not contingent on participation or responses?

Other cultures: When conducting research on other cultures, either in other countries or in minority cultures, researchers should avoid using classifications or designations that allow unreasonable generalization. While respecting traditional values and norms in other cultures is a prerequisite for responsible research, discrimination and culturally motivated abuse must not be accepted. It is important to distinguish between a descriptive analysis of observations and its analysis relative to a normative position.

- *Question:* Does my description and analysis avoid cultural stereotyping?

Responsibility towards the research community and the public.

Co-authorship: Researchers must observe good publication practice, respect the contributions of other researchers, and observe recognized standards of authorship and cooperation. Four criteria define rightful authorship: (a) the researcher must have made a substantial contribution to conception and design *or* the data acquisition or the data analysis and interpretation; (b) the researcher must have contributed to drafting the manuscript or critical revision of the intellectual content of the publication; (c) the researcher must have approved the final version before publication; (4) the researcher must be

able to accept responsibility and be accountable for the work as a whole (albeit not necessarily all technical details) unless otherwise specified.

- *Question:* Did all co-authors meet these requirements? Are there any contributors whose contribution needs to mention in the acknowledgements?

Citation practice and plagiarism: Researchers and students must follow good citation practice and indicate clearly and unmistakably from which source ideas, theories or results have been taken. Plagiarism occurs when someone takes someone else's ideas and presents it as her/his own. Plagiarism violates the duty of truthfulness in science.

- *Question:* Did I accurately refer to others' ideas, concepts, theories, methods and findings in my work?

Data sharing and reproducibility: Sharing of research data is often a prerequisite for building up knowledge, comparing results and critically testing the work of others. Improved openness and quality assurance can be achieved by sharing data. This practice of sharing data often depends on the discipline and academic journals and publishers. As a general rule, we should strive to allow academic colleagues to reproduce our results and findings.

- *Question:* Did I explicitly share the data generating process, data and analysis?

Anti-bribery and anti-corruption policy

CMI staff and contracted partners are not permitted to request, accept, offer or give, directly or indirectly, bribe money or advantages.

Bribery occurs when you offer, pay, seek or accept an improper payment, gift or advantage to influence a business or governmental outcome or decision. Engaging in bribery or turning a blind eye to your suspicions of bribery, can result in liability for CMI and for you personally. Bribes can be in the form of money, or anything else of value, such as a gift or donation, travel benefits, employment benefits, or any other advantage.

Facilitation payments are small unofficial payments aimed at expediting or securing the provision of products or services to which you or the company is legally entitled. A facilitation payment is illegal under several anti-bribery laws and is considered by CMI to be a type of bribe. It is strictly prohibited for anyone representing CMI to offer, make or receive facilitation payments.

No employee or business partner will suffer adverse consequences for refusing to engage in improper payment activity, even if this results in loss of business.

Procurement

Procurement of goods, works and services is carried out in accordance with the applicable legislation and internationally accepted principles and good procurement practices. CMI strives to follow procurement practices to ensure value for money and realize efficiencies and opportunities in our procurement processes.
Relationships with suppliers should be fair, transparent, and should create value for all parties.

CMI's Director and Administrative and Finance Director have budgetary spending authority. On the different projects/programs, the heads of the projects are given this role within the frames of the project's budget and according to the contractual obligations on the specific projects.
If possible, at least 3 different suppliers should be considered in the procurement process if one single procurement exceeds the amount of NOK 30 000. In some cases, especially when subcontracting research or research-related services, the unique capability of a supplier may make direct purchase the most efficient and appropriate solution. Nevertheless, all procurements should be according to CMI's standards where price, quality and availability are the main factors to be considered. Performance history, the risk of the proposal, the flexibility to adapt to possible change over the lifetime of the material or service, and the contract options will be assessed in the procurement process.

Gifts and Hospitality

CMI does not allow gifts or hospitality where giving or accepting them could influence business decisions, violate any local laws or the policies of the recipient company, or cause others to perceive such influence or violation. The acceptance of gifts is prohibited, unless these are small or token gifts of a low value.

All offered and received gifts and hospitality shall always be properly recorded in CMI's Gifts and Hospitality Register.

Charitable donations to organizations do not carry the same requirement for mutual benefit. However, no charitable donations shall be made for political or religious purposes. All charitable donations must be approved in advance by CMI's management.

Conflict of Interest

Conflict of interest arises from situations in which one part of CMI's work may influence, or appear to influence, the objective or impartial performance of another part of its work. Conflict of interest may also arise if some activity by CMI or its staff gives, or is perceived to give, CMI an undue advantage in pursuing funding. A personal conflict of interest may occur when personal relationships can influence or could be perceived to influence a person's decision making when acting for CMI. Any conflicts of interest that cannot reasonably be avoided shall be made fully transparent and reported.

CMI is a project organisation. As such, conflict of interest situations may occur when CMI apply for funding/bid for projects where we already have been involved in a previous stage. These situations are to a large extent all unique and have carefully to be handled case by case.

CMI staff has a personal responsibility to:

- be alert to any actual or potential conflict of interest;
- take steps to avoid such conflict;
- inform CMI management of any known real or potential conflict of interest;
- comply with any final decision to withdraw from the situation.

CMI's management has an organizational responsibility to:

- be alert to any actual or potential conflict of interest;
- take steps to avoid such conflict;
- inform external parties—funders, partners, or others affected—of such conflict or potential conflict;
- if such conflict exists, develop, document, and monitor implementation of a plan for mitigating the impact of such conflict, for example, by assuring separate staffing and oversight (possibly external) of projects where such conflict exists.

Child and Vulnerable People Safeguarding Policy

CMI is committed to conducting our activities in a way that respects human rights, including the protection of children from abuse, exploitation, and neglect.
All CMI staff are required to:

- Comply with host country and local child welfare and protection legislation and international standards, whichever gives greater protection.
- Maintain an environment that prevents child abuse, exploitation, or neglect,
- Include child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations. Report concerns about potential child abuse, neglect or exploitation by CMI staff or partners to CMI Management or according to CMI's Whistleblowing policy.

Trafficking in Persons (TIP)

CMI is committed to conducting our activities in a way that respects human rights, including opposition to human trafficking and forced labour in any form.
CMI employees and contractors shall not engage in any TIP related activities, like:
• Trafficking in persons (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime);
• Procuring commercial sex acts;
• Using forced labour;
• Acts that directly support or advance trafficking in persons.
Failure to comply with this policy could result in disciplinary action up to and including termination of employment.

All CMI employees and contractors are required to report any possible non-compliance immediately to CMI's Management or via the Whistleblowing procedures. Any questions regarding this policy should be directed to the CMI Management.

Privacy and Data Protection

CMI shall maintain appropriate measures to protect personal data according to the EU General Data Protection Regulations (GDPR).

CMI' fundamental data protection rules include:

- The processing of personal data shall take place in a fair and lawful way
- The collecting and use of personal data shall only be made for explicit and legitimate purposes
- The personal data shall be kept accurate and where necessary up to date
- Personal data shall not be kept longer than necessary
- All personal data shall be kept confidential and stored in a secure way
- Personal data shall not be shared with third parties except when necessary

CMI has an agreement with NSD (Norwegian Centre for Research Data) who are CMI's Data Protection Partner regarding GDPR in research data (https://nsd.no/nsd/english/ .

Whistleblowing, notifications

All employees of CMI are accountable and under obligation to raise any issues of doubts or suspicion of wrongdoing to the CMI management. Routines for such notifications and procedures are prepared and easily accessible to all staff at CMI's intranet.

Our partners as well as our target groups and any interested members of the public can contact CMI's management if they have justifiable reason for believing that these guidelines have been breached. CMI will carefully examine all information given, maintaining confidentiality, if so desired.

Process for managing breaches of research ethics norms

CMI has the duty to develop and implement routines and processes to handle issues of ethical misconducts and breaches to its code of ethics and other recognized research ethics norms.

Research ethics misconduct is defined as "falsification, fabrication, plagiarism and other serious breaches of good research practice that have been committed willfully or through gross negligence when planning, carrying out or reporting on research" (Law on research ethics, §8). "Good research practice" refers to research ethics, as presented in the Research Ethics section of this code and in the NESH Guidelines[2].

[2] link to NESH guidelines

Investigating and sanctioning reserch ethics misconduct is the responsibility of CMI, first and foremost. In order to maintain independence during the investigation process, CMI management delegates investigating responsibility to the Research Ethics Committee in a first instance, and, for particularly serious misconduct, to the Integrity Commission (Felles Redelighetsutvalg – FRU) of the Research Institutes Common Arena (Forskningsinstittutene Felles Arena – FFA)[3]. As a last resort, the National Commission for the Investigation of Research Misconduct can be appealed to. Sanctions are always a responsibility of the research institute – the Ethics Committee, the Integrity Commission and the National Commission for the Investigation of Research Misconduct can conclude on whether ethic misconduct occurred, not on sanctions.

Reporting ethical misconduct

Research ethics should, as far as possible, be handled by the institute, and at the lowest possible level. Minor issues of research misconduct should be handled by the relevant project's principal investigator, or by the line manager.

If anyone (staff members, partners etc…) suspect severe research misconduct, this should be reported to the Research Ethics Committee, preferably in writing.

The report of suspected misconduct should cover who is suspected, when and in which context it happened, and describe the suspicion of misconduct in details, including whether scientific publications are involved (in which case, a list should be included), and how the sender of the report is affected by the misconduct.

In line with recommendations by the Integrity Commission and the National Commission for the Investigation of Research Misconduct, the Research Ethics Committee will strive to protect the confidentiality of whistleblowers and suspects of research misconduct. The Research Ethics Committee will inform the sender of the report regarding if and how it will be able to ensure his/her anonymity.

In special cases of severe research misconduct, directly affected persons, the Research Ethics Committee, or the institute's management may report the directly to the Integrity Commission (FRU). Add **how to contact the Integrity Commission here**. As a last report, the National Commission for the Investigation of Research Misconduct can be contacted by filling the relevant form available at https://www.etikkom.no/en/our-work/about-us/the-national-commission-for-the-investigation-of-research-misconduct/report-suspicion-of-research-misconduct/.

Preliminary investigation

Once a report has been received, the Research Ethics Committee will conduct a preliminary investigation in an independent manner. The preliminary investigation aims to establish facts, in to evaluate whether there is a need for further investigation, and whether it indeed involves research

[3] FFA is an association of independent research institutes, under the umbrella of the trade and employers' association Abelia, of which CMI is a member.

ethics misconduct. The Research Ethics Committee will then submit its report to CMI's management, advising on whether to pursue further investigations.

On the basis of this report, CMI's management may mandate and prepare further investigations.

Investigation

If the preliminary investigation gives cause for suspicion of research ethics misconduct / scientific fraud, the institute conducts an internal fact-finding investigation. CMI's management may mandate the Research Ethics Committee or call in external, independent expertise.

The factual investigation will reveal objective matters by means of interviews, possibly with contradiction, as well as document review. Based on the factual study, which will be written down in a

report, the institute's management decides whether the case should be sent to the Integrity Commission (FRU) for consideration.

If the institute wants the Integrity Commission (FRU) to handle a case, the institute will present the case to the Integrity Commission (FRU), including the relevant issues of research ethics, as well as the factual investigation report.

If a case is brought before the Integrity Commission (FRU) by a researcher or outsider with legitimate interest, and the institute believes it should not be dealt with by the Commission (FRU), the institute shall justify this to the Commission, which then decides whether or not to take the case into consideration.

Transparency and process documenting

All essential steps in the process must be documented and minutes of all meetings must be prepared

The defendants must be notified, given the right of access, and the right to comment during the process. Affected researchers and others with legitimate interest in the case shall be given the right of access to the Institute's factual investigation and presentation to the Integrity Commission (FRU), with the exception of information concerning the duty of confidentiality for the purposes of the Public Administration Act.

A written final report is prepared including a statement on how the case was managed, as well as relevant documents. Defendants and other parties to the case are given the right to comment on the final report's fact description

When the Integrity Commission (FRU) has concluded a case, the final statement is sent to CMI. The institute will follow-up in accordance with its procedures for dealing with research ethics misconducts.

Final statement

Once a case is concluded, after a preliminary investigation, an investigation, or an investigation by the Integrity Commission (FRU), the management will release a final statement on the case, informing on whether the defending researcher has indeed breached research ethics norms, whether systemic failures within CMI have been identified, and whether research publications must be corrected or retracted.

Appeal

CMI's management shall inform the National Commission for the Investigation of Research Misconduct if severe breaches of research ethics norms have been identified.

A defendant who has been recognized of having breached research ethics norms may appeal to the National Commission for the Investigation of Research Misconduct. The National Commission's conclusions are final.

Sanctions

Research misconducts will be sanctioned. Sanctions shall be decided by CMI's management, depending on the severity of the misconducts, as part of the employer-employee relationship.