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Questions and Answers regarding the ITER Code of Conduct

This Supplement to the ITER Code of Conduct is designed to illustrate the application of the Code and relevant rules and guidelines to various conduct situations.

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Change Log

Questions and Answers regarding the ITER Code of Conduct (UBE943)

<i>Version</i>	<i>Latest Status</i>	<i>Issue Date</i>	<i>Description of Change</i>
v0.0	In Work	01 Aug 2017	
v1.0	Signed	03 Aug 2017	First version
v1.1	Approved	21 Aug 2017	Minor changes for clarification in answers to questions 5, 10, 14, 15, 17 and 22
v2.0	Signed	09 Aug 2024	This updated version is aligned with the revised ITER Code of Conduct in place in 2024. In addition, it includes matters related to the prevention of psychosocial risks: establishment of a just and fair culture; addressing workplace violence.
v2.1	Approved	20 Sep 2024	Comments to version 2.0 are included

Questions and Answers regarding the ITER Code of Conduct



This Q&A document is a supplement to the ITER Code of Conduct ([4FDYTY](#)). Its purpose is to give examples of how the Code can be applied, highlighting relevant rules and guidelines **that could be applied in various situations**. It is intended to demonstrate how the decision-making tools, resources and principles described in the Code can be leveraged to help decision-making and create a culture of the shared CARE values in our highly diverse working environment. The examples below are a selection of questions and situations as examples; this is not a comprehensive document, it is meant to offer guidance when applying the Code of Conduct to real situations at work.

Reference: composition of the Ethics Committee - [Ethics at ITER - Bizz Corner - Office of the Director General](#)

Contents

APPLICATION OF THE CODE	1
CONDUCT	3
USE OF IO RESOURCES	6
CONFLICT OF INTEREST	7

Application of the Code

1. Does the Code of Conduct apply to me?

Section 2.1 of the Code that includes the ITER Values applies to everyone working for the ITER Project, whether at the ITER Site or at the Domestic Agencies. For more details on each category, you may refer to Categories of Personnel or Non-Staff Personnel in relation with the ITER Organization ([82SFNB](#)).

Section 2.2 applies specifically to ITER Organization staff members, directly employed and seconded.

2. Who should I ask if I have a question about the Code of Conduct?

If you have questions about the Code or how to apply the guidelines to real life situations, we recommend you contact:

1. Your manager
2. The IO's Human Resources Division
3. one of the Ethics Committee members (see full list of members in <https://confluence.iter.org/display/ORG/Ethics+Committee>)
4. An [Ombudsperson](#).

3. *I have observed a situation at work which gives me ethical concerns. What should I do?*

In most cases it is best to talk to your manager, or, if you feel uncomfortable doing so, contact an Ethics Committee member or raise your point throughout the whistleblowing policy ([9EBM3V](#)).

If it is harassment related, you may submit a complaint as described in the Policy against Harassment, Discrimination and Abuse of Authority ([VGFZCA](#)).

If the situation is an emergency where persons or IO assets are in immediate danger, call the emergency number (+33 (0)4 42 17 00 00) or notify the Head of Safety and Quality Department (SQD) or Administration Department (ADM) directly.

4. *As a manager, what is my role regarding the application of the Code of Conduct?*

As a manager, you are expected to ensure that your team members are aware of the Code of Conduct, to provide them with clarifications when needed, to be alert to problems and to create a climate where questions or comments by the members of your team about the Code are encouraged. You should do your best to demonstrate the principles of the ITER Values and the ethical principles of the Code in your day-to-day behavior, striving to be a role model of the ITER culture based on our shared CARE values. If you are ever unsure about ethical issues you may face in your team, or particular situations where the Code may be needed for decision-making or guidance, feel free to ask for support from the Ethics Committee.

5. *As an IO directly employed staff, if I am not satisfied with an IO administrative decision (performance report, contract renewal...), may I contact my Domestic Agency so that they try to solve the issue with the Organization?*

If you are not satisfied with an administrative decision made by the ITER Organization, it is always best to first try to discuss the issue with the most closely involved party in the decision-making process, this is best practice, as long as there is no fear of retaliation or harm. It's best to see how it could be resolved by speaking to relevant IO staff members, such as your manager, Ethics Committee members, HRD, an Ombudsman or other senior managers at IO that may be able to help. You may also consult with the Staff Committee, which is always in full confidentiality. If the matter cannot be resolved amicably, you may discuss directly with the Director General, or seek recourse before the Director-General through an Internal Appeal, by following the procedures set out in the Staff Regulations. Bringing the matter directly to a third party would be contrary to our obligations as an international civil servant as we are bound by confidentiality and we should act independently from any external interference.

6. *What should I do if I am in a situation or behaviour which I find problematic, but nothing is written specifically about it in the Code of Conduct?*

Consider the following questions to help you decide what to do.

- Am I in conformance with the CARE values, principles and policies of the ITER Organization?
- How would I feel if my actions were publicly reported?
- Could my actions lead to any direct or indirect negative consequences for the ITER Organization?

You may seek further advice from the contact points mentioned in Question 2.

Conduct

7. *My colleague has made comments about cultural traits of my country of origin/religion. I feel offended by these negative stereotypes, they make me feel uncomfortable. What could I do to address this?*

Negative comments, including those based on stereotypes are not acceptable as they work against the inclusive environment that ITER needs to thrive, which creates the culture where diversity, respect and inclusiveness are valued. Such harmful comments may also include body shape, age, gender and more. Comments that refer to stereotypes and are demeaning or insulting need to be addressed, even if the intent was not to offend. If you feel comfortable doing so, you could explain to the person(s) why and how their comments are not acceptable and may generate bias and stereotypes as well as make people feel uncomfortable or unwelcome.

If the problem remains unresolved after this first step, or if you don't feel comfortable speaking about this directly to the person(s), you can talk to your manager who will take appropriate actions to make sure the inappropriate behaviour ceases. If this is not sufficient, you may bring this to the attention of other contact points mentioned in Question 2.

8. *I am not comfortable shaking hands or kissing others on the cheek and feel this is imposed on me by some colleagues. Do I have to adjust to this practice?*

Cultural habits, such as the morning greetings in France (*bise*) should not be imposed on colleagues. We should all be aware that these are not universal and should prioritize the comfort of our colleagues.

When getting to know a new colleague, for example, you should ask what their preferred greeting is. Have open discussions with your colleagues about your preferences and daily routines to make sure that everyone is at ease with greetings and other rituals in the team. Encouraging open discussions about our own cultures and preferences enriches the experience of all of us at the IO.

9. *I am an assistant and recently took up a new position. My new manager asked their previous assistant to look after personal matters, such as their apartment and personal mail while on they were on mission. What should I do if I am asked to do the same?*

While it is possible that your manager's former assistant took care of these tasks because of an agreed arrangement, and while it is not against IO policy, you are not under any obligation to work on personal tasks. It is your right to let your manager know that personal favors and tasks and not appropriate for you in your role as an IO Employee. If this leads to any problems, you may wish to raise the matter with your second level manager or the Head of Human Resources.

10. *Can I keep a small religious statue or image in my office?*

Yes, that is permitted. However, in choosing what to keep or display in your office, please be mindful of how this may make others feel.

We have strength in diversity. At the same time, be conscious that some views may make others uncomfortable or may even be considered offensive. Diversity of perspectives and backgrounds is a real strength for ITER. It can be valuable and interesting to learn about different backgrounds and cultures, with an open, curious mind. It is one of the benefits of working here. Take care when expressing your views and be considerate of others' perspectives. Asking questions and having a tolerant attitude can help guide you on these matters.

11. *I am aware that a colleague of mine has made false claims in the context of a recent mission. What should I do?*
Situations like this can be awkward and difficult. Nevertheless, all IO staff are obligated to report any fraud, corruption or misuse of the organization's resources to the attention of the Head of the Internal Audit Service directly, through your manager or through the [whistleblowing policy \(9EBM3V\)](#).

You can report such behaviour without fear of reprisal. Before doing so, you may also consider raising privately with the colleague your concern about this behaviour and give them the opportunity to correct the claims. Under no circumstances should you actively participate in, or facilitate the commitment of a misconduct by another staff member.

12. *My line managers can be highly intimidating. I understand they are setting demanding standards of work in the team but sometimes I feel it goes too far and humiliates me. This affects the morale of the team. What can I do?*
IO Managers are expected to manage their teams in accordance with good management practices, which include encouraging feedback and honest interactions. While we all strive for excellence and may need to be challenged, none of us should feel bullied or humiliated. The CARE Values provide guidance on an 'ITER way of doing things' in a shared culture.

If you feel comfortable, you can speak with your manager directly about how specific behaviour makes you feel. Where possible you can refer to the CARE Values, in particular the Effective Behaviors described under Collaboration and Respect.

If this does not result in any changes, or if you do not feel comfortable addressing your manager directly, you may request advice from the contact points mentioned in Question 2.

13. *I am aware of an error made in a document, but I am afraid to reveal it because this may generate negative consequences for me or for others. What should I do?*

It can be hard to admit an error, especially if you feel there may be repercussions, but it is your responsibility to correct or report the error (or any wrongdoing you are aware of, whether your own or that of a colleague). It may help to focus not on the consequences for you or others of reporting the error, but the consequences if the error is not reported. Many errors may have safety or other implications if they are not corrected.

To report an error, several channels are in place: you may alert your manager, raise non-conformance report or a ticket. Another option is to use the [whistleblowing policy \(9EBM3V\)](#). It is a sign of mature professionalism to be accountable for your actions, and it is ITER's responsibility to not punish staff for acting in line with our values.

It is IO policy that no one shall be punished proactively reporting an error. Subsequent situations may be subject to consequences when deciding on remedial measures.

14. *My team is very informal. We often tell jokes about each other and act as if we are close friends. But sometimes, I feel that some "jokes" may go too far — I heard remarks about sex, gender, race, colour, language, religion, political or other opinion, national or social origin, property, birth, sexual orientation, gender identity, age, state of health, disability, marital status, or other status, and I am not sure if all of us are always comfortable with these jokes. Where is the line between jokes and hurtful or offensive remarks?*

In determining whether something is hurtful or offensive, we always consider firstly the recipient of the remarks. The intent of the person who made the remarks is important as good will does matter,

and it can help to resolve the issue. We are all working together to achieve something great, which requires respect for our colleagues. This includes respect for different backgrounds, attitudes and beliefs. If you witness someone making clearly or potentially offensive remarks intervening in a thoughtful way can be helpful, although it is not always possible or easy to do so. You can also contact Human Resources for confidential advice.

We should be considerate and respectful about any discussion regarding personal attributes, such as race, ethnicity, culture, sexual orientation, gender identity, health status, disability and so on, that make up a person's complex identity and their experiences associated with them. Humour or jokes, even if well intended, may cause offense or create a work environment that feels disrespectful or unsafe. At the ITER Project, our differences are an opportunity for inclusion and learning, and to continually be open to new vocabularies and concepts that evolve and may differ from culture to culture. Please be sensitive to these differences and pay attention to the reaction of colleagues when humor or judgment comments are at play.

15. My manager has a habit of yelling at and demeaning some of the colleagues he supervises. Recently, I witnessed how they insulted a colleague, to the point that the person had tears in their eyes. I also overheard the person who was blamed saying that she/he sometimes feels uncomfortable with the requests she/he gets from the manager since she is not entirely certain they are fully compliant with the rules. I am concerned because the manager decided unilaterally to have the staff transferred to another unit. What would I do?

It is not always easy to support a colleague who is experiencing such a challenging situation with a manager. Simply showing empathy for your colleague and listening can already significantly support them. Yelling and demeaning behaviors are not what we strive for in the CARE Values.

Together you could seek support from a higher management staff member (the manager of your manager, for example) or a senior leader whom you know and trust as a person of integrity. Managers should treat their staff with respect and foster collaboration, as described in the CARE Values. You may also request support from contact points mentioned in Question 2.

16. My manager requests me to perform a task which I think is not the best option. What should I do? What if I think that the instruction is illegal?

There is a wide range of disagreements on options to take. Some may be simply a different approach where your manager may have more information. In such cases, it may be helpful to ask for clarification. You can also express why you feel your option is better due to technical reasons, cost effectiveness, or others. Such matters can often be resolved by discussing the matter openly in pursuit of an agreed solution.

There may be other situations where you consider there could be ethical or legal problems with the course of action. If your manager is unwilling to discuss, or if you remain convinced that there is reason to suspect wrongdoing or illegality, you should immediately alert your higher management, the Director-General, Human Resources or you may submit a [whistleblowing report](#).

17. I made a mistake, but I was not aware of the rule, will I be blamed?

When dealing with employee mistakes, errors, or deliberate violations, ITER promotes the use of Just and Fair principles. In this instance, if another person with the same competency and qualifications as yourself could have made the same mistake, and it can be confirmed that there was a lack of training or experience, then the situation would be considered a mistake induced by the system and you will not be personally held accountable. The most important point is to be honest

and open about your mistakes or if errors occur. Everyone can make errors, admitting and correcting them is the behavior that we value at ITER, in particular as a nuclear operator.

18. I chose not to follow a rule or procedure because it is a burden and wastes time, and I don't need to follow them to do accomplish my work responsibilities. What could happen to me if I am caught?

At times some of the Rules and procedures that are in place at ITER can feel cumbersome or time consuming. It is important to realize that they are here for a reason and have an important function, even if you are not always aware of what that function is. Many procedures or rules are there to ensure your safety, the safety of others, or the integrity of systems and equipment. It is important that rules and procedures are respected and followed.

Following these rules and procedures also protect you from personal liability. In some cases, not following ITER rules or procedures could be considered intentionally putting others in harm. As such it would be considered an infringement that could trigger protection rules, which range from a verbal warning to a permanent or temporary ban from the ITER Site, without to any additional disciplinary measure to be taken separately.

If the violation is due to a manager's and/or supervisor's dereliction of duty, i.e. giving orders in conflict with ITER site specific safety instructions, the disciplinary actions will apply to the supervisor and/or manager and if appropriate, to the employee.

Rather than not following a procedure, you are encouraged to suggest process improvement if you feel that it is not appropriate. For this you may send an email to process.improvement@iter.org.

Use of IO Resources

19. May I use my IO email account for non-professional email exchanges?

Occasionally it may be necessary to use your ITER email address for personal emails. This is acceptable as long as it is occasional and does not become habitual. It is preferable not to be done during working hours and not to overburden the ITER electronic network. Personal emails remain the responsibility of the individual who is writing/receiving the correspondence at the ITER email address. The content of the mail must conform to the ITER Values (sexually explicit texts or pictures, political messages, or any content which is discriminatory are prohibited).

Additionally, except if they are explicitly marked as private, please be aware that they may be reviewed by the IO, in particular in the context of an investigation.

20. My daughter needs urgent copies of a document. Can I make the copies at the ITER Organization?

The use of ITER Organization scanners and copiers is for professional purposes only. Use for personal purposes is permissible if justified, and it should be on an exceptional basis.

21. Can I borrow a video projector or a screen for the weekend?

The video projectors and screens belong to the ITER Organization and cannot be taken home.

22. *May I use my IO computer to communicate with my family?*

As per the IT Acceptable use principles (27ZPBE), personal use of the IO IT equipment is permissible provided it does not impact negatively the Organization. You may prefer for your own privacy to use personal communication devices for family communication.

23. *Can the ITER Organization track the websites I visit if I am connected from my Wi-Fi at home?*

For security purposes, the ITER Organization monitors activities on organization-owned devices. This includes tracking websites visited to protect against cyber threats such as malware and ransomware.

24. *How can I assess if the private use of ITER Organization facilities does not go beyond reasonable limits?*

The main criterion to assess the reasonable limits is common sense: private use should not conflict with your professional duties, including time, concentration, and nuisance to others etc. Further guidance can be obtained from contact points of Question 2.

25. *Can I keep personal effects in my office?*

Small objects are permitted. They remain under your own responsibility and the working place must be kept neat and tidy for safety and housekeeping reasons.

Conflict of Interest

(More guidance and rules on this subject are available in Internal Administrative Circular No 36 – [U44AH5](#))

26. *I am working on a tender for engineering services. A friend of mine who is working in purchasing for a consumer goods company asks me to share experience about tendering and to show him the tender I am working on. The sector he works for is quite different from ITER so I think there might be no harm in giving him the document. What should I do?*

You may not disclose documents related to our procurement process, unless they are in the public domain. You may speak in general terms about how such processes work, but do not share the documentation.

ITER Organization information that you have access to in your function should be treated as confidential. If you have any uncertainties whether you can share documents externally, you should ask your manager or check with Legal Affairs.

27. *I have been asked to participate in a bid assessment as a technical expert. I realise that one of the competing companies is a company I worked for 10 years ago. I no longer have any link with them. What shall I do?*

In addition to avoiding actual conflicts of interest, the IO reputation rests on avoiding situations that could lead to a potential or perceived conflict of interest. In this situation, even if you do not have a current link with this supplier, you must inform the Head of Procurement of the situation, preferably in writing, of the risk of perceived conflict of interest, prior to any commitment to participating in the bid selection.

28. *I am a member of a charity that is raising funds for a humanitarian operation. We sell handicrafts. May I bring some and ask my colleagues if they are interested?*

Yes, provided that you have IO approval as described in the Internal Regulations ([27WDZW](#)) and that you do not put pressure on your colleagues to buy these. In terms of exerting pressure, you should also be aware of power imbalances. Managers should therefore avoid such activities. This activity should also not interfere with your working hours.

29. *May I participate in a lawful demonstration against a policy of the French Government that is not directly related to my work at ITER?*

Yes, provided that you participate without any indication or insinuation that you do so on behalf of the ITER Organisation, and avoid any identification that would link you to the ITER Organization. If you have a public profile related to the IO, such participation would not be advisable.

30. *What should I do if journalists contact me to visit the ITER Site or to give some personal comments on nuclear fusion related news reports/ Science projects?*

Any request from the press must be referred to the Communication Team, you may send an email to ITERCommunications@iter.org or contact a person in the communications team directly.

[questions 31-40 apply only to IO staff members]

31. *I am supervising an intern who is doing a master's degree in project management. The intern writing a report and wants to include some facts and figures about the ITER Organization. Is it my responsibility to check the information in the report, and is the intern bound to the ITER Organization's obligation of confidentiality?*

Yes, it is important that you check the information included in the report as all contributors to the ITER Organization, including interns or PhD students, are expected to respect the confidentiality of information. Interns and their managers are required to comply with the Internship Program Policy, which defines the rules pertaining to confidentiality and intellectual property. When you supervise an intern, you are accountable for the respect of the policy and the internship commitment. The report should be reviewed as is done for other publications (see Publication Procedure [344KKT](#)).

32. *Can I help a friend or family member get a job at the ITER Organization, including as non-staff?*

As staff members of a publicly funded international organization, we all have a role to play in ensuring that employment decisions are made solely on the basis of merit and not due to a personal or family relationship. As such, you may not advocate for your spouse, partner, or eligible close relative who is applying for a staff or non-staff position at the ITER Organization. As for friends, it would not be appropriate to advocate for the hiring of individuals with whom you only have a personal relationship and do not have a basis for assessing their professional qualifications.

At the same time, we are all advocates of ITER as a good employer. It is in the IO interest to have the best available people working with the IO. If you believe your friend can make a valuable contribution it would be reasonable to provide help in terms of understanding the recruitment process, reviewing a cover letter or application, and possibly with networking while applying reasonable judgement to introducing your friend to senior officials.

33. *A supplier whom I work with has offered me a ticket for a concert during the Aix festival. I felt it was not possible to refuse. What should I do?*

Generally, you should not accept gifts, and report this situation to your management.

We should not accept gifts that are valuable or that are offered more than once a year by the same source. At the ITER Organization, the threshold amount for acceptable gifts is 50 Euros, and the gift must be reported by the staff in their declaration of interest.

Gifts between 50 and 200 Euros should not be accepted without managerial approval, and they should also be reported in the declaration of interest. Gifts above 200 Euros should be politely refused explaining the rationale below.

The rationale for this rule is that accepting the gift might impair your objectivity or it might be perceived by a competing vendor to question the fairness of the process. This would constitute, or be perceived as, a conflict of interest.

34. I am part of a joint working group with CEA and TechnicAtome. We have our kick off seminar next week in a hotel and the chairperson invites us for lunch at the restaurant. Shall I accept?

You must report it in your declaration of interest, but in principle you can accept since the invitation is related to your work and is considered to be a normal courtesy of a meeting organizer.

35. I am nominated for an academic decoration in my country. What shall I do?

Inform your manager who will forward the authorization request to the Director-General through Human Resources. The IO should be pleased when our staff are recognized externally. At the same time, acceptance of any honour or decoration requires prior authorization of the Director-General.

36. Can I become a member of a scientific association and hold responsibilities in this association?

Yes. However, you remain subject to confidentiality and the applicable regulations concerning conflicts of interest.

The approval of the Director-General is requested only for engaging in activities of an occupational character, which is not the case when participating in an association.

37. I have received an offer to teach physics at the local university. This is outside my working hours. May I accept?

Even if outside of your working hours, if this is a remunerated activity of an occupational nature then you need prior authorization before accepting this offer, following the procedure described in Internal Administrative Circular No. 20 External Activities ([3MQTXE](#)).

38. I have been approached by the mayor of my village to be a candidate for the next local election. Can I accept?

If you intend to run for a public or political activity you should inform the Director-General as stipulated in Article 3.5 of the Staff Regulations, by submitting a declaration of intention to stand for office to the Human Resources. The Director-General will assess the situation and, in case of incompatibility, taking unpaid leave or terminating your employment may be decided during the campaign and/or upon election.

39. May I publicly support a particular political candidate for elected office?

In principle, such support is permissible if it is compatible with your general obligations as a staff member, in particular your obligation of tact and discretion and your obligation to refrain from any act which may harm the reputation of the IO. Consequently, common sense and good judgment are required. In particular, you should consider the importance of the office the candidate is running

for, your level of visibility within the Organization and the level of publicity that may be given to your support.

More globally, you should be mindful about your online or public presence and your identity, which can easily be connected to your participation in the ITER Project.

40. Because of my employment at the ITER Organization, I am entitled to immunities. Does it mean that I am exempt from provisions set out in the French traffic regulations?

The immunities of ITER staff are functional immunities, meaning that you are only immune when in the course of carrying out the duties required by the IO.

IO staff, regardless of their nationality and position, are expected to follow the French driving rules. In the case of a traffic violation, you are expected to pay the fine. Due to the nature of the ITER Project and the importance of our reputation in the local communities IO staff should be mindful of safety rules at all times. As staff members of ITER, we should do our best to be respectful of the local environment and communities into which we have been welcomed.