

EPOS ERIC CODE OF CONDUCT



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Principal Authors	Diana Piras, Maria Fredella, Lucio Badiali, Carmela Freda
Contributing Authors	EPOS ERIC ECO Team
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Introduction

The European Plate Observing System (EPOS) is Europe's leading research infrastructure dedicated to integrating data, tools, and services from the solid Earth sciences. It provides seamless access to multidisciplinary scientific resources, enabling researchers to study geodynamic processes such as earthquakes, volcanic eruptions, tsunamis, and tectonic activity.

As a strong advocate of Open Science, EPOS promotes open and universal access to high-quality, harmonised data and services. This approach empowers scientists to tackle complex societal challenges and to drive innovation in hazard assessment, disaster resilience, and the sustainable stewardship of geo-resources. By ensuring that research data and services are transparent, freely accessible, reusable, and impactful, EPOS enhances the scientific community and delivers tangible benefits to society as a whole.

EPOS is built on a federated architecture that connects national and transnational research infrastructures. By bringing together scientists, technology experts, and policymakers around reliable access to high-quality data, EPOS ensures the long-term sustainability of solid Earth science research.

Recognised as a landmark in the European Research Infrastructure Roadmap, EPOS was established in October 2018 as a European Research Infrastructure Consortium (ERIC), a legal entity under EU law headquartered in Italy. Today, EPOS is among the most widespread ERICs in operation, with 19 members and one observer, reflecting both the strong commitment of European countries and the strategic importance of EPOS within the European and national research infrastructure roadmaps.

In line with its mission to provide sustainable and long-term access to solid Earth science data and services through the integration of diverse European Research Infrastructures under a common federated framework, EPOS ERIC and its staff members are dedicated to pursuing activities that serve the organisation and its stakeholders' best interests.

The EPOS ERIC Code of Conduct sets out a common framework of shared values and core principles to guide behaviour. It articulates the ethical commitments expected of decision-makers, executives, operators, and staff members working under the ERIC framework, with explicit reference to Articles 1 and 3 of the EPOS ERIC Statutes. This Code fosters a workplace that is fair, respectful, and inclusive, which is essential to both individual well-being and achievement of high-quality outcomes.

The Code of Conduct is rooted in the cumulative efforts of the EPOS Community, drawing on lessons learned since the inception of EPOS and incorporating guidance from the EPOS ERIC Ethics Board. It is firmly grounded in the ethical values and principles outlined in the EPOS ERIC Code of Ethics.

For ease of reference, this document is organised into five chapters: the first four constitute the Code itself, and the final chapter provides guidelines for the misconduct reporting process.

1. Purpose and applicability

The EPOS ERIC Code of Conduct establishes fundamental principles and essential rules that uphold integrity in daily interactions and decision-making processes within EPOS ERIC. It consolidates the ethical expectations outlined in the EPOS ERIC Code of Ethics and provides guidance to staff members on promoting and fostering a respectful and professional workplace culture that safeguards their responsibilities, respects their rights, and specifies their obligations.

This document serves as a comprehensive reference for ethical conduct. However, it does not address every possible ethical challenge, nor does it replace the need for sound personal judgment in complex situations.

Acceptance of the Code of Conduct and adherence to its values constitute a condition of employment. Individuals in positions of responsibility or professionally engaged within EPOS ERIC, including directors, officers, collaborators, consultants, suppliers, and members of EPOS ERIC boards and committees, are expected to actively ensure compliance with the ethical standards outlined in this document.

Any proven violation of this Code of Conduct may result in administrative or disciplinary proceedings, as deemed appropriate by the competent authorities.

2. Fundamental values and principles

The EPOS ERIC Code of Conduct is founded on a set of core values that embody the principles guiding ethical behaviour within the organisation. These values are designed to promote a positive, responsible, and respectful work environment. They include:

1. **Integrity:** acting honestly and transparently in all professional dealings.
2. **Respect:** treating others with dignity and consideration, fostering an environment where diversity is valued, and conflicts will be dealt with professionally.
3. **Accountability:** respecting responsibility for actions and decisions which should align with organisational mandates and goals.
4. **Fairness:** encouraging impartiality, equality, and justice in decision-making, opportunities, and interactions among staff and external stakeholders.
5. **Confidentiality:** safeguarding sensitive information and respecting the privacy of others, except when there is a legal requirement to disclose.
6. **Compliance:** adhering to all relevant laws, regulations, policies, and procedures.
7. **Professionalism:** demonstrating competence and commitment to quality in all work-related activities and interactions.
8. **Transparency:** encouraging openness in decision-making processes and communication.
9. **Commitment to Excellence:** striving for continuous improvement, innovation, and maintaining high-performance standards in all aspects of work.
10. **Responsibility and Sustainability:** implementing and promoting best practice in the sustainable management of social-economic and natural resources.

3. Rules of conduct

EPOS ERIC staff members are expected to consistently demonstrate respect, courtesy, tolerance, and professional cooperation in all workspace interactions. Staff members shall collaborate in a spirit of openness, honesty, and transparency, fostering engagement, teamwork, respectful communication, and the constructive exchange of ideas and opinions.

3.1 Diversity and inclusion

A diverse and inclusive organisational environment is fundamental to the success of EPOS ERIC as a respected international research infrastructure. All staff members should be encouraged and supported in realising their full potential. The staff members contribute a wealth of perspectives and expertise that are vital in fulfilling the organisation's goals and mission. Differences among individuals shall be treated with the utmost respect, valued for their contributions, and recognised as key drivers of strength and innovation. Accordingly, EPOS ERIC staff members are expected to consistently demonstrate respect, openness, and understanding towards individuals whose languages, religions, cultures, customs, and communication styles may differ from their own. For matters related to equality, diversity, and inclusion, the [EPOS ERIC Gender Equality Plan](#) serves as the principal reference document.

3.2 Respectful feedback on performance

Performance feedback supports EPOS ERIC staff members in achieving their objectives and contributes to the organisation's ability to fulfil its mission and goals. This feedback shall be accurate, objective, truthful, timely, and fully aligned with established management procedures. Regular feedback fosters an open and respectful working environment in which everyone is encouraged to express their opinions. This environment is essential for addressing issues as they arise and for promoting constructive and favourable resolutions. Individual feedback must be treated confidentially unless there are sufficient reasons to breach this confidentiality.

3.3 Harassment

Harassment encompasses any inappropriate and unwelcome behaviour, whether by an individual or a group, directed toward another person in an offensive or harmful manner. Such behaviour constitutes harassment when the perpetrator knew, or should reasonably have known, that their actions would cause offence or harm. Importantly, harassment does not require intent or deliberate actions to be deemed unacceptable. Harassment may manifest itself through words, gestures, or actions that cause annoyance, alarm, abuse, intimidation, belittlement, humiliation, or embarrassment, or that contribute to an intimidating, hostile, or offensive work environment. While harassment often involves repeated incidents, even a single occurrence may qualify as harassment if it has a significant impact on the individual concerned or the overall work environment. EPOS ERIC staff members are required to treat one another with respect and to refrain from engaging in any offensive, intimidating, or hostile conduct.

The following are non-exhaustive examples of behaviours that may constitute harassment.

Sexual harassment includes any unwelcome behaviour that could reasonably be expected to cause, or is perceived to cause, offence, humiliation, or distress, particularly where it disrupts professional duties, is imposed as a condition of employment, or creates an intimidating, hostile, or offensive work environment. Such conduct may occur within the workplace or during any work-related activities. Sexual harassment may consist of a series of actions or a single incident. In determining whether behaviour constitutes sexual harassment, the assessment shall take into account the perspective of the individual subjected to the conduct, based on what a reasonable person in their position would consider inappropriate or offensive. Sexual harassment is strictly prohibited at EPOS ERIC. The organisation maintains a zero-tolerance policy toward such behaviour. It is committed to

implementing victim-centred prevention and response measures to ensure a safe, respectful, and inclusive working environment for all. Examples of conduct that may constitute sexual harassment include, but are not limited to: i) unwanted touching, such as patting, stroking, or brushing against someone; ii) persistently asking someone for dates or personal encounters; iii) making sexual remarks or comments about a person's appearance, body, or sexuality; iv) sharing jokes, anecdotes, or images of a sexual nature; v) addressing someone with a name or term carrying a sexual connotation; making gestures of a sexual nature.

Abuse of authority refers to the improper use of influence, power or authority against another individual. Such misconduct is grave when authority is misused to unfairly impact another person's career or employment conditions, including decisions related to appointments, assignments, contract renewals, performance evaluations, or promotions. Abuse of authority may also involve creating a hostile or offensive work environment through intimidation, threats, blackmail, or coercion. Examples include pressuring individuals to manipulate facts or violate rules, obstructing access to essential information or resources, or requesting staff to perform personal errands or favours unrelated to their professional duties. Such conduct is unacceptable and undermines fairness, respect, and organisational integrity. Staff members are expected to wield authority fairly and consistently, discharging their official duties while respecting the rights and needs of colleagues and all individuals engaged in EPOS activities. The misuse of authority not only harms individuals but also damages the collective workplace and the organisation's reputation.

Discrimination refers to any unfair treatment or arbitrary distinction based on an individual's race, sex, gender, sexual orientation, gender identity, gender expression, religion, nationality, ethnic origin, disability, age, language, social origin, or any other comparable characteristic or trait. Discrimination may occur as an isolated incident directed toward an individual or group, or it may manifest through harassment or abuse of authority. All individuals must be treated equally, which requires impartiality, fairness, and active effort to recognise and mitigate unconscious bias. This obligation is particularly critical in decisions relating to employment, appointments, and career advancement within the organisation. Any statements, actions, or behaviour, whether in person or online, that incite hatred or promote discrimination based on race, sex, religion, nationality, ethnicity, sexual orientation, or other personal characteristics, are strictly prohibited and wholly unacceptable at EPOS ERIC.

3.4 Integrity and transparency

Acting with integrity and transparency requires staff members to conduct themselves honestly and fairly, without seeking personal gain or granting undue advantages to others. It entails the disclosure and proper management of any actual, perceived, or potential conflicts of interest. Integrity also demands accountability for achieving agreed objectives and a commitment to proactive, open communication. Transparency will be exercised to the fullest extent possible, while always respecting confidentiality obligations and protecting sensitive information.

3.5 Due care

EPOS ERIC resources shall be managed responsibly and used exclusively for their intended purpose to ensure cost-effectiveness and to prevent waste, misuse, or misappropriation. Staff members are expected to exercise due diligence, empathy and professionalism in the performance of their responsibilities. While occasional mistakes may occur in the course of work, reckless behaviour or gross negligence is unacceptable and may constitute misconduct, subject to corrective or disciplinary action.

3.6 Avoiding conflict of interest

A conflict of interest arises when personal interests, or those of a third party, interfere with, or appear to interfere with, the interests and objectives of EPOS ERIC or cast doubt on its essential integrity, independence, and impartiality. Importantly, a conflict of interest may exist even when no personal gain is involved. Conflicts can be actual, potential, or perceived. Even the perception of a conflict may

erode trust in the independence and impartiality of EPOS ERIC and its staff members. Situations that may give rise to conflict of interest include, but are not limited to, outside professional activities, political involvement, acceptance of gifts, favours, or awards, as well as personal relationships. A conflict may arise if personal gain or interests overlap with organisational objectives, resulting in mutual or third-party benefits even in the absence of direct personal advantage.

Staff obligations. Staff members must promptly disclose any situation involving a perceived or actual conflict of interest to ensure proper evaluation. When necessary, corrective actions may be taken to protect the integrity and reputation of EPOS ERIC. To prevent actual or perceived conflicts of interest or preferential treatment, EPOS ERIC rules stipulate that contracts shall not be awarded to individuals with close family relationships with staff members, including parents, guardians, children, or siblings. Any such personal relationships must be disclosed. Staff members shall not offer gifts or favours in connection with their official duties. This ensures that no impression arises of attempting to influence official decisions or creating an expectation of reciprocity. Staff members must also refrain from requesting or accepting gifts or favours from colleagues or third parties that could compromise their neutrality. Reasonable tokens of gratitude or customary hospitality may be accepted only when directly connected with official duties, such as at conferences, meetings, or events.

Outside activities. While employed at EPOS ERIC, staff members are expected to dedicate their full time and attention to their assigned duties and responsibilities. EPOS ERIC generally supports and approves initiatives that contribute to employees' professional development and align with the organisation's mission, provided such activities comply with applicable internal rules and guidelines.

3.7 Protecting property and resources

Staff members are responsible for safeguarding the property and resources of EPOS ERIC, ensuring their use exclusively supports the organisation's work and serves its best interests. All assets must be used solely for their designated official purposes. This includes both tangible resources, such as funds, IT equipment, and supplies, and intangible resources, including working time. Staff members must take all reasonable measures to prevent waste, misuse or misappropriation. EPOS ERIC staff members represent the organisation's most valuable asset. Effective time management and dedicated performance are essential to the organisation's success in fulfilling its mission. Staff members are also expected to act with prudence when claiming benefits and entitlements. All claims must be reasonable, submitted in good faith, and supported by appropriate documentation. Fraudulent or false claims will be treated as serious misconduct and may result in disciplinary measures, including dismissal.

Use and protection of records and data - EPOS ERIC holds responsibility for its members and stakeholders to ensure the accurate, reliable, and secure capture, maintenance, and management of records. All records created in the course of activities are the property of EPOS ERIC and must remain accessible to the organisation. Records must be retained in accordance with prescribed retention periods, disposition procedures, and applicable legal requirements. Staff members are prohibited from intentionally removing, altering, or destroying records, except where expressly permitted under records management or archival policies and procedures. When handling data, staff members must exercise discretion and sound judgment. In cases where information is to be communicated outside of EPOS ERIC, compliance with applicable rules and procedures must be ensured, and prior authorisation obtained where required. If in doubt, staff members should consult their supervisor. Unless explicitly stated otherwise, all data must be treated as internal or confidential. Internal data refers to information not made public due to its preparatory, incomplete, or unapproved status (e.g., correspondence, draft documents). Confidential data refers to sensitive information provided to or generated by EPOS ERIC on a confidential basis. Data obtained during official duties must never be used for personal gain or to advantage third parties. Likewise, it must not be used to harm or prejudice any individual or third party. For further guidance, staff members are required to consult the relevant provisions on conflicts of interest, fraud, and corruption.

Intellectual property - EPOS ERIC reserves the right to use, publish, translate, and distribute the outcomes of work produced by its staff members in accordance with its mandate. Staff may only use the intellectual property of others when: i) prior consent has been obtained; ii) the material has been made publicly available without restriction (e.g., under a Creative Commons license). When producing EPOS ERIC work products, authorship must be assigned appropriately, reflecting the contributions of all parties to the creation and development of the published material.

Confidential information - EPOS ERIC is committed to transparency while recognising the necessity of protecting confidential information. This includes, but is not limited to: i) investigation files; ii) personal data of employees; iii) medical records; iv) vendor proposals; v) proprietary information; vi) intellectual property. Protecting such information is essential to maintaining the organisation's integrity and the trust of its members and stakeholders. Confidential and proprietary information must not be disclosed to parties outside EPOS ERIC. Within the organisation, access is restricted to individuals with a legitimate need-to-know in the course of their official duties. Any data not publicly available must be treated as confidential. Staff members are therefore required to exercise discretion and sound judgment in handling information, ensuring compliance with organisational protocols and applicable legal requirements.

Fraud and corruption - Fraudulent and corrupt practices pose a serious threat to the integrity of EPOS ERIC's work. The organisation maintains a strict zero-tolerance policy toward such actions. All staff members share the responsibility of reporting suspected incidents of fraud or corruption to safeguard the interests of the infrastructure. Full cooperation with investigations into allegations of fraud and corruption is mandatory.

Fraudulent and corrupt practices encompass, but are not limited to: i) exchanging money, gift, or favours for preferential treatment (e.g., sharing confidential information with a vendor, kickbacks, and bribery); ii) knowingly providing or approving false information or concealing relevant details in the context of procurement activities, payment requests, contracts or letters of agreement, staff entitlements or the job application and recruitment process; iii) using EPOS ERIC resources for private purposes in a way that disrupts or deprives their intended organizational use; iv) entering into collusive agreements between two or more individuals to obtain undue benefit or financial advantage.

EPOS ERIC will take all reasonable measures to recover misused or defrauded funds from those responsible.

3.8 Environmental responsibility

The mission of EPOS ERIC is deeply rooted in respect for and protection of the environment. The organisation is committed to advancing the understanding of the Earth system while recognising that faithful environmental stewardship requires safeguarding Planet Earth for both present and future generations. This mission guides all EPOS ERIC operations, ensuring that sustainability is upheld not only as an organisational goal but as a guiding principle. In alignment with environmental laws and global standards, EPOS ERIC supports initiatives that address climate change and strengthen ecological resilience. Through scientific collaboration and public engagement, the organisation fosters a culture of awareness and responsibility, reinforcing the importance of maintaining the Earth's natural balance. Accordingly, staff members are expected to minimise their ecological impact by reducing waste, conserving natural resources, and integrating sustainable practices across all infrastructure and activities.

3.9 Procurement

To ensure the responsible use of resources, all procurement activities shall be conducted in a competitive, transparent, and fair manner. They must also be carried out impartially to avoid any actual or perceived preferential treatment. All procurement processes are subject to and must strictly comply with the [EPOS ERIC Procurement Rules](#).

4. Implementation and enforcement framework

EPOS ERIC staff members are required to adhere to and actively promote the provisions of the EPOS ERIC Code of Conduct. They are expected to lead by example, serving as role models of integrity and professionalism. Supervisors and managers must provide clear guidance, ensure that those under their responsibility understand the expected standards of conduct, and act promptly and appropriately upon becoming aware of potential ethical violations or misconduct.

Failure to comply with established rules will result in disciplinary action against EPOS ERIC employees. Administrative measures may be applied to other individuals, depending on their specific roles within the organisation.

EPOS ERIC is committed to the practical implementation of the Code of Conduct through a structured and consistent approach that fosters awareness, understanding, and compliance throughout the organisation. The Code of Conduct will be broadly communicated through formal channels, including informational sessions, training programmes, and, where necessary, translations to support a multilingual workforce. All employees will receive an official copy of the Code of Conduct, in either digital or printed form, and be required to acknowledge receipt and understanding of it. New hires will be introduced to the document during onboarding to set clear expectations from the outset.

To reinforce understanding and compliance, additional measures such as communication material, targeted training (e.g., workshops, case studies, and refresher courses) will be organised, focusing on key ethical and legal issues, including harassment prevention, data protection, and conflicts of interest. Staff members will also be encouraged to seek clarification through designated channels, thereby fostering a culture of shared responsibility and accountability.

The Code of Conduct will be regularly reviewed and updated in response to legislative developments, evolving workplace practices, and organisational priorities. All updates will be clearly communicated and reaffirmed by staff members. These measures will ensure that the Code of Conduct remains a relevant, accessible, and enforceable standard, essential to maintaining EPOS ERIC's ethical culture, professional integrity, and legal compliance.

5. Guidelines for the reporting process

In accordance with applicable international and national legislation, including the General Data Protection Regulation (GDPR), EPOS ERIC refers to the EU Directive 2019/1937. It adopts the provisions of Italian Legislative Decree No. 24 of 10 March 2023.

The following section provides practical guidance on the procedures for reporting and managing alleged misconduct.

5.1 Who can report?

Any individual operating within the EPOS ERIC working environment (staff members) may qualify as a reporting person. This includes, but is not limited to:

- Employees, subordinate workers, or collaborators (i.e., in-kind personnel).
- Self-employed individuals, freelance professionals, consultants, and suppliers.
- Persons performing functions of administration, management, control, supervision, or representation.

5.2 What should be reported?

Staff members are encouraged to report any conduct that constitutes mobbing, harassment, sexual harassment, discrimination, or any other behaviour detrimental to personal dignity, as well as any misconduct explicitly listed under Article 3 of this Code, if they believe they have been subjected to it, are currently experiencing it, or are aware of it. Reports should also include any violations of national laws or European Union legislation that harm the public interest or the integrity of the organisation, in addition to any breaches of internal organisational policies.

Specifically, reports may concern:

- Acts that have already been committed or those that have not yet occurred but which the reporting person reasonably believes may happen based on concrete evidence (well-founded suspicions).
- Actions aimed at concealing violations.
- Incidents that occurred during an employment relationship that has since ended or during a probationary period.
- Actions that occurred before the employment relationship formally commenced, provided that the information concerning the reported violations was obtained during the recruitment process or other pre-contractual stages.

5.3 How to report?

Staff members who wish to report any misconduct, as outlined above, are encouraged to use the EPOS ERIC customised web-based IT system, which employs data encryption to protect the confidentiality of the individual's identity and the contents of the report.

The IT system is designed to:

- Minimise data dispersion across different IT systems.
- Support staff members in submitting accurate and complete information.
- Ensure data confidentiality through encryption.
- Simplify privacy management for users, including notices and retention policies.
- Streamline workflow handling with secure notifications that prevent the exposure of sensitive information.
- Maintain anonymous communication with staff members to safeguard their identity.
- Display case status and outcomes securely to the staff members.
- Generate statistical data without compromising confidentiality.

The IT system incorporates questionnaires to encourage the collection of all essential information, enhancing coherence and reducing errors or extraneous data. It ensures a minimum dataset necessary for the report's processing validation checks on data consistency (e.g., dates, email addresses).

The IT system encrypts all data. It provides staff members with a secure access code to monitor their reports, upload documents, and communicate anonymously with the Listening Desk (see following paragraph), ensuring confidentiality and facilitating effective case follow-up provided by the Experts.

5.4 How to manage the report?

EPOS ERIC will establish a Listening Desk to ensure a legally compliant, impartial, and secure process for managing any reports, to prioritise the protection of staff members, organisational assets, and reputation. The Listening Desk is designed to identify and resolve issues before they escalate, thereby maintaining a supportive workplace environment that fosters staff retention.

The Listening Desk will comprise the *Confidential Counsellor* and the *Committee of Specialists*, appointed for their professional qualifications, independence, and proven expertise in areas related to the prevention, management, and resolution of misconduct. The EPOS ERIC General Assembly formally appoints these members and must operate with complete independence and impartiality. They will act under the provisions of a Terms of Reference without any hierarchical or functional dependence on the employer or the organisation's legal representative, and are responsible for ensuring the confidentiality, integrity, and secure handling of any reports or communications from the staff members.

The Confidential Counsellor will be responsible for:

- Receiving and registering all reports of misconduct.
- Conducting a preliminary assessment of the factual and legal relevance of each report.
- Safeguarding the confidentiality of all information acquired in the performance of duties.
- Coordinating and cooperating continuously with the Committee of Experts to ensure the adequacy and proportionality of remedial and preventive measures proposed to the EPOS ERIC governing bodies as collective advice.

The Committee of Experts will provide specialised expertise, including but not limited to:

- Psychological support and counselling services, including in cases of interpersonal or relationship conflict.
- Technical and legal assessments to ensure compliance with applicable legislation and organisational regulations.
- Professional evaluation of complex cases requiring multidisciplinary input.

Following the assessment of a misconduct report, the Confidential Counsellor, together with the Committee of Experts, may directly inform the Executive Director or the Chairpersons of the General Assembly, depending on the nature of the matter. It will be acknowledged that all shared information will be anonymised to protect individuals' privacy.

To monitor activities, promote transparency and enhance institutional accountability, an annual report will be submitted to the General Assembly and the Executive Director. The report will detail the activities undertaken, issues addressed, and proposed remedial measures, while ensuring that no personal data or identifiable information is disclosed.

The Confidential Counsellor and the Committee of Experts will each serve a term of two (2) years, renewable once only. Renewal of the mandate will remain subject to the strict requirements of professional independence, including impartiality and competence, as applicable at the time of reappointment.

