

Code of Conduct

Toward the Open Society:

Innovation to Enhance Freedom and Sustainability

15 January 2026



Introduction

Competere–Policies for Sustainable Development (hereinafter Competere or “we”) is a non-profit organisation receiving private subvention to promote and advocate for policies that enhance freedom and promote innovation and sustainability. The organisation is fully committed to the principle of honesty, integrity and fair play in the delivery of its activities. All staff, consultants, fellows and board members (hereinafter “members”) should ensure that the businesses of Competere, such as the activities of analysis and research, divulgation and advocacy, and relationships with stakeholders are dealt with in an open, fair and impartial manner.

This Code of Conduct sets out the basic standard of conduct expected of all members and the organisation’s policy on matters such as human and labour rights, sustainability, innovation, acceptance of advantages and declaration of conflict of interest by members in connection with their official duties. This Code also applies to all members, including staff, temporary consultants, board members, fellows, suppliers, or any other stakeholder that operates with or under Competere.

Pledge and Responsibilities of Stakeholders

Stakeholders shall pledge to comply with this Code of Conduct. If they become aware of any non-compliant activity, they shall immediately report this to their manager or via the internal reporting system.

Stakeholder Engagement and Education

Competere strives to respect human rights throughout the value chain by thoroughly communicating the contents of this policy to our stakeholders.

We provide continuous relevant education and training to all stakeholders. We work on capability building necessary to put this code and policies into practice so that they permeate all business processes and communication of our organisation and stakeholder organisations.

We recognise the importance of understanding and sharing the contents of this code of conduct and its impact on the general public and the environment. We interact with all stakeholders to educate them and motivate them to promote individual freedoms and human rights, innovation and sustainability.

Relationship with Members and Stakeholders

Members are all individuals working with or for Competere (staff, consultants, fellows, board members and scientific board members, etc.). Stakeholders are all individuals or organisations (financial supporters, donors, suppliers, the media, policy makers, public officials, etc.) that interact and affect or are affected by Competere’s action. With a global vision and science-based approach, we will recruit and find qualified members and stakeholders to build a partnership based on mutual understanding and trust.

In selecting members and stakeholders, we will thoroughly review their personal qualities, competences and knowledge, reliability and commitment to diversity recognition, innovation and sustainability. We will give due consideration to their respect for human diversity and rights, the adoption of responsible and sustainable practices, including areas such as the promotion of individual freedoms and the rule of law, the elimination of child labour and forced labour, biodiversity conservation and zero deforestation, and the promotion of an equal and fair salary.



Our Legacy of Integrity and Consistency

We provide analysis and/or run campaigns that comply with or contribute to enhancing the law and regulations, and the strictest existing standards. The outcome of our research and advocacy will not offend or harm the dignity and honour of any individual or third party.

Our communication with members and stakeholders is sincere, addressing defects and complaints quickly and in good faith, and strives to determine causes in order to eliminate them and prevent their recurrence.

We Promote Innovation and Sustainability

We contribute to resolving complex commercial, economic, and social issues by promoting innovative policies and industrial solutions, as well as accelerating collaborative creation with members and stakeholders, and further integrating practices that promote innovation, sustainability, and food and energy security.

We strive to develop solutions that contribute to individual and social development and use them with due consideration of their impact on individuals and the environment.

Our solutions have been developed on the basis of experimental scientific method, avoiding any set ideological or religious perspective. In our critical thinking approach, all ideas and views are fully considered and respected as long as they respond to the experimental process and contribute to promoting individual liberties, innovation and sustainability.

As a non-profit organisation founded by individuals and private citizens, we will strive to build a rapport with communities and contribute to their development by working together to resolve social issues.

Free Trade is Fair Trade

To ensure free and open competition, we will observe the fundamental rules of trade, including domestic and overseas competition laws and regulations, and act in compliance with legislation and sound ethics.

We will have no relationship whatsoever with forces that discriminate diversity and liberties anywhere in the world, and resolutely reject involvement in improper transactions.

We strictly prohibit and will have no involvement in bribery and other corrupt business practices. We will neither give or receive gifts, nor extend or accept invitations to business entertainment beyond socially accepted limits, as we recognize that such practices can foster corruption (see Solicitation and Acceptance of Advantages paragraph).

When working with political entities, we will build and maintain sound and transparent relationships.

We comply with applicable laws, respect social cultures and practices, and act sincerely and fairly in countries and regions where we operate. Furthermore, we will do so guided by international norms and standards even in areas where legislation is not adequately enforced.

Respect for Individual Rights

We promote our understanding of the rule of law and internationally-recognised individual and human rights, and will respect and not infringe on the human rights of all those involved in our activities.



We respect individual and human rights in the recruitment of members (e.g., staff and fellows) and in all other organisational activities with our stakeholders. We will not engage in any acts that may impair individual dignity or discriminate on bases such as gender, sexual orientation, age, nationality, race, ethnicity, ideology, belief, religion, social status, family origin, health status or disability.

Staff and consultants are hired in compliance with the relevant laws and regulations in each country and region, and in accordance with international norms and standards. We will not partner with stakeholders that use child labour employing children below the minimum working age or forced labour against the will of employees.

We strive to resolve issues through sincere and constructive discussion among members and stakeholders, in compliance with the laws, regulations, and labour practices of each country and region, and in accordance with international norms and standards.

Solicitation and Acceptance of Advantages

We prohibit all members and stakeholders from soliciting any advantage from any persons having business dealings with the organisation (donors, members, staff, consultants, suppliers, etc.). Staff who wish to accept any advantage from such persons should seek special permission from the Management Board prior to acceptance.

Any gifts offered voluntarily to the staff or consultants in their official capacity are regarded as gifts to the organisation and they should not be accepted without permission. Staff and consultants should decline the offer if the acceptance could affect their objectivity in conducting the organisation's activities, induce them to act against the interest of the organisation, or lead to complaints of bias or impropriety.

For gifts which are presented to our staff or consultants in their official capacity and of nominal value (below €100), the refusal of which could be seen as unsociable or impolite, the Management Board has given blanket permission to accept these gifts. In other circumstances, staff members should apply in writing to the Management Board for permission to accept the gifts.

Proper records of these applications should be kept showing the name of the applicant, the occasion of the offer, the nature and estimated value of the gift, and whether permission has been granted for the applicant to retain the gift, as well as any other indications given regarding the gift.¹

Acceptance of Entertainment

Our staff or consultants are not allowed accept lavish, unreasonably generous or frequent entertainment from any person having official dealings with the organisation.

Conflict of Interest

A conflict of interest situation arises when the “private interests” of the staff or consultants compete or conflict with the interests of the organisation. By “private interests” is intended both the financial and personal interests of personnel or consultants or those of their connections, including:

- family and other relations;
- personal friends;

¹ There is, however, no restriction on the acceptance of advantages by the staff and consultants in their private capacity, from any person who does not have any official dealings with Competere. In case of doubt, they must refer the matter to the Management Board.



- clubs and societies to which they belong; and
- any person to whom they owe a favour or are obligated in any way.

Our staff, consultants, fellows and members are prohibited from using any information made available to them in the course of their duties to benefit themselves, their relations or any other persons with whom they have personal or social ties.

They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the organisation. Failure to avoid or declare any conflict of interest may give rise to criticism of favouritism, abuse of authority or even allegations of corruption.

In particular, our staff or consultants involved in the procurement process must declare conflict of interest if they are closely related to or have beneficial interest in any company which is being considered for selection as our supplier of goods or services.

Our staff, consultants or any member will make a declaration in writing to the Management Board of a potential conflict of interest and will abstain from dealing with the matter in question or follow the instruction of the Management board.

Misuse of Official Position

Staff or consultants who misuse their official position for personal gain or to favour their relatives or friends are liable to disciplinary action or even prosecution. Examples of misuse include a staff member responsible for the selection of suppliers giving undue favour or leaking tender information to a relative's company with a view to awarding the contract to the latter.

Handling of Classified or Proprietary Information

In order to maintain and expand a trustworthy relationship with our various stakeholders, we disclose information openly and transparently, and respond to stakeholders responsibly through dialogue and other means of communication.

We properly manage and protect confidential information related to our business activities in compliance with domestic and international laws and regulations, as well as our internal rules and policies.

We do not disclose any classified or proprietary information to anyone without authorisation. At all times, when we have access to or are in possession of such information, we provide adequate safeguards to prevent its abuse or misuse.²

All our internal and external organisational processes are strictly monitored and safeguarded using state-of-the-art security technologies and practices.

We are partner with the Italian Privacy and Data Protection Institute to ensure the most advanced practices and technologies.

We are compliant with international standards, and particularly with the European Data Protection Directive (Regulation (EU) 2016/679). We promote the ethical handling of information to ensure respect for human rights and security, through the proper management of personal information based on our Data Protection Policy.

² Examples of misuse include disclosure of information in return for monetary compensation, or use of information for personal gain.



Property of the Organisation

We will protect our own intellectual property and respect third-party intellectual property, and use both effectively for smooth business operations.

We will manage our own and third-party confidential information on the basis of its importance, and manage and handle it appropriately based on this ranking.

We will protect and enhance the value of the Energy with brand, recognising it as an important management asset.

Misappropriation of the organisation's property for personal use or resale is strictly prohibited. When we access any property of the organization we ensure that it is properly used for the purpose of conducting the organisation's activities.

Gambling

We acknowledge the right to gamble as it pertains to individual freedom, particularly if on social occasions where refusal of gambling is considered unsociable. We discourage frequent or excessive gambling with persons who have business dealings with the organisation as well as among stakeholders.

A Proactive Working Environment

We support flexible work styles and respect diverse values and attitudes. We follow a Mission and Control approach that empowers individual freedom, leadership and a strong sense of community.

We believe in a work environment that provides our stakeholders with tools, experience and knowledge to accelerate their personal growth.

The flexible work style is supported by fair economic compensation that complies with international and regional labour laws.

We promote the physical and mental health of all our stakeholders, and particular our staff and consultants and their families.

We invest in educational programmes to help staff and consultants expand their capabilities and exercise their strengths.