

## **EPACA Code of Conduct**

The EPACA code of conduct applies to all activities undertaken by EPACA members in the context of their EU Public Affairs work. Our work as public affairs professionals contributes to a healthy democratic process, acting as a link between the world of business, civil society and European policy-makers. Conscious of their responsibilities, the signatories to the EPACA code are committed to abide by it, acting in an honest, responsible and courteous manner at all times and seeking to apply the highest professional standards.

When carrying out the activities described above, public affairs practitioners shall:

- (a) identify themselves by name and by company;
- (b) declare the interest represented;
- (c) neither intentionally misrepresent their status nor the nature of their inquiries nor create any false impression in relation thereto;
- (d) neither directly nor indirectly misrepresent links with EU institutions;
- (e) honour confidential information given to them;
- (f) not disseminate false or misleading information knowingly or recklessly and exercise proper care to avoid doing so inadvertently;
- (g) not sell for profit to third parties copies of documents obtained from EU institutions;
- (h) not obtain information by dishonest means;
- (i) avoid any professional conflicts of interest;
- (j) neither directly nor indirectly offer or give any financial inducement to any elected or appointed public official, or staff of their institutions and political groups;
- (k) neither propose nor undertake any action which would constitute an improper influence on them;
- (I) only employ former EU personnel according to the rules and confidentiality requirements of the respective EU institutions;

Committed to upholding the highest possible standards of ethics and transparency in the conduct of their profession, the signatories shall also:

- (m) be mandatorily signed up to the EU Transparency Register and publicise their registration both proactively and on request;
- (n) be diligent in disclosing to the EU Transparency Register truthful and verifiable statutory information on activities carried out with the objective of directly or indirectly influencing the formulation or implementation of policy and the decision-making processes of the EU institutions;



- (o) subject their staff to the EPACA code of ethics and conduct regular training to instil our core principles and values and a sound understanding of the workings and implications of the code(s) of conduct;
- (p) strictly apply the rules and confidentiality requirements to which former personnel of the EU institutions are subject to;
- (q) proactively abide by any code of ethics applied by their clients;
- (r) refuse any assignments for clients or potential clients who request that the EPACA member does not abide by the EU transparency regime;
- (s) advise clients to sign up to the EU Transparency Register as appropriate;
- (t) ensure the highest level of commercial confidentiality in the management of their portfolio of clients while fulfilling the requirements of the transparency regime;
- (u) proactively raise and address any conflicts of interest, both at personal and corporate level;
- (v) be mindful of potential competition law infringements and proactively work to avoid them;

The signatories agree that they and all individuals acting on behalf of their companies will adhere to the EPACA Code and will avoid actions likely to bring discredit upon the profession or the Association.

The signatories further agree to be subject to the disciplinary rules of EPACA (as set out in the Statutes and Internal Regulations, extract attached) in case of alleged breach of the EPACA Code.

The signatories will meet annually to review the EPACA code.

## I hereby subscribe to the EPACA Code of Conduct on behalf of (firm): Signature: Name: Date: Address: Tel: Fax: E-mail: Please return to EPACA, (details below)