



Fisheries  
Transparency  
Initiative

# CODE OF CONDUCT

*VERSION: 2.0*

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# PREAMBLE

The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder initiative that strengthens transparency and collaboration in marine fisheries management. By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long-term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.

Its reputation as an initiative promoting good governance in fisheries, in particular transparency, participation and accountability, is one of its greatest assets. Activities in implementing countries as well as its international governance play an important role in creating and maintaining this reputation.

The purpose of this FiTI Code of Conduct (further referred to as the 'Code') is to prevent situations that could compromise FiTI's national and international reputation or ongoing work by setting out norms of conduct which are expected of those involved in the FiTI.

Whether on the national level (through National Multi-Stakeholder Groups) or on the international level (through the FiTI International Board), the FiTI is uniquely constituted to include representatives from all key stakeholder groups, each of whom brings important perspectives and interests to FiTI-related deliberations and decisions. This diverse representation ensures that all voices are heard and that decisions are well-informed and balanced.

**It is recognised that, by design, many of the stakeholders involved in the FiTI have inherent conflicts of interest as they represent the voices and interests of the groups they work or are involved with. The purpose of this Code, and particularly its 'Conflicts of Interest' provision, is not to eliminate these inherent conflicts but to manage them in a way that maintains transparency, fairness, and the integrity of decision-making processes.**

Hence, all FiTI Stakeholders (as defined below) must adhere to high ethical standards, prioritising the overall mission and best interests of the FiTI above their individual or multi-stakeholder group's interests when pursuing transparency in the sustainable management of marine fisheries.



# APPLICABILITY

The Code applies to the following persons, in the following referred to as '**FiTI Stakeholders**', regardless of their location:

- Members of the FiTI International Board, including Observers and its Chair;
- Employees, consultants, and advisors of the FiTI International Secretariat;
- FiTI National Leads;
- Members of FiTI National Multi-Stakeholder Groups, including the group's Chair as well as Alternates and Observers (if applicable); and
- Employees, consultants, and advisors of FiTI National Secretariats.

While not directly legally binding, FiTI Stakeholders commit to abide by this Code within the scope of their **FiTI-related activities**.

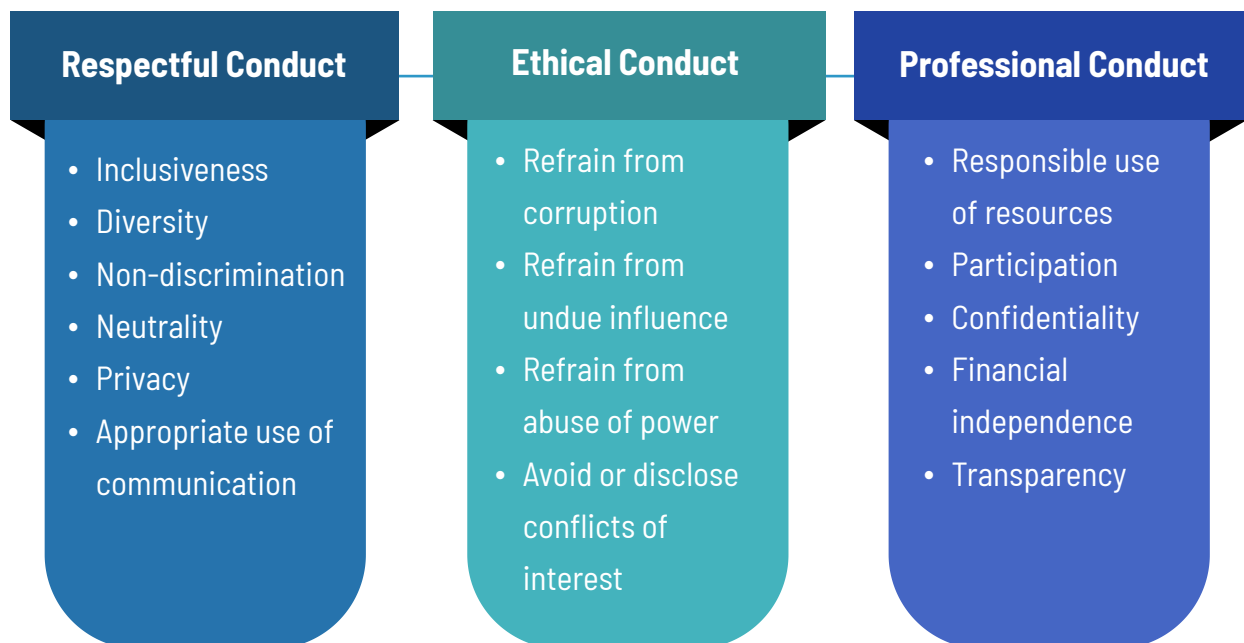
This Code is intended to supplement but not replace any applicable laws, internal regulations or governing norms of conduct which are already applicable to FiTI Stakeholders (e.g. due to their current work positions).



# NORMS OF GOOD CONDUCT

FiTI Stakeholders are aware that they have a special role to play in observing the highest standards of good conduct and in promoting the FiTI and its principles<sup>1</sup> to others in a manner that preserves and enhances public confidence in their integrity and the integrity of the FiTI, ensuring that their involvement in the FiTI remains in good standing at all times.

The Code covers **three areas of good conduct**:



[1] For more information on the FiTI Principles, please refer to <https://fiti.global/about-the-initiative>.

## RESPECTFUL CONDUCT

FiTI Stakeholders shall treat each other and those with whom they work and interact with respect and consideration, in particular:

working in genuine partnership with representatives from governments, business (incl. both large- and small-scale fisheries), civil society and other relevant organisations to increase transparency and participation in fisheries governance for the benefit of a more sustainable management of marine fisheries;

INCLUSIVENESS

being sensitive to diversity, including in terms of age, nationality, cultural background, gender, religion, disability, political convictions, union activities, family status, and sexual orientation;

DIVERSITY

not engaging in or facilitating any discriminatory or harassing behaviour directed towards anyone whom they come in contact with;

NON-DISCRIMINATION

not allowing their political affiliations and/or activities to unduly influence or interfere with the political neutrality that is the hallmark of the FiTI;

NEUTRALITY

respecting the privacy and private lives of each other and those with whom they work and interact with when dealing with personal information;

## PRIVACY

ensuring that in any public professional and personal communications or social media posts, presentation or participation in events or other similar occasions discriminatory, non-polite, and sexist language is avoided as well as any expression that could harm or undermine the reputation and good standing of the FiTI;

## APPROPRIATE USE OF COMMUNICATION

## ETHICAL CONDUCT

FiTI Stakeholders shall observe the highest standards of ethical conduct, in particular:

not tolerating corruption, including bribery, extortion and money-laundering in any form, whether direct or indirect – this includes facilitation payments, which are bribes and must not be made;

REFRAIN FROM  
CORRUPTION

not soliciting or accepting gifts, gratuities, discounts, honoraria, travel reimbursements or any other item of value that may influence or be perceived to influence the exercise of the stakeholder's function, performance or judgement;

*Any of the above-mentioned benefits over the value of one hundred and fifty dollars (USD 150) must be declared to and recorded by either the FiTI International Board or the relevant FiTI National Multi-Stakeholder Group. Any benefit considered excessive must be refused.*

REFRAIN FROM  
UNDUE INFLUENCE

not abusing powers granted by their duty nor representing to third parties that their authority as FiTI Stakeholders extends any further than that which it actually extends to;

REFRAIN FROM  
ABUSE OF POWER

acting at all times in the best interest of the FiTI and be highly sensitive to conflicts of interest. A conflict of interest occurs when FiTI Stakeholders' **personal interests** interfere with their **FiTI-related duties**. Such FiTI-related duties may include, but are not limited to:

- recruiting personnel for FiTI National Secretariats or the FiTI International Secretariat,
- hiring consultants to support FiTI national implementations as well as FiTI's international management and governance,
- appointing members, alternates, and observers to National Multi-Stakeholder Groups or to the FiTI International Board,
- engaging organisations as partners (even on a pro-bono basis), or
- seeking financial support from donors.

A FiTI Stakeholder's personal interests may include a **financial or non-financial benefit** from FiTI-related duties (as mentioned above) for

- themselves,
  - their family up to the second degree,
  - close personal acquaintances,
  - associated voluntary organisations, statutory authorities, commercial organisations or other bodies.
- if the FiTI Stakeholder has, directly or indirectly, through business, investment, family up to the second degree, close personal acquaintances, and associated bodies, a relationship with any of the people or organisations described in the cases above.

A **financial benefit** includes, but is not limited to, direct ownership, investments, employment, compensation, and financial relationships that may result in a monetary gain or loss.

AVOID OR DISCLOSE  
CONFLICTS OF INTEREST

A **non-financial benefit** includes, but is not limited to, increasing or maintaining a professional or personal reputation, enhancing an individual's career, or accessing education, privileged information or facilities.

In addition, **only applicable to members of the FiTI International Board**, a conflict of interest occurs when issues are presented for

- a decision that involves the country of nationality or permanent residence of a FiTI International Board Member, such as decisions on country validations or decisions related to non-compliance, or
- a decision that relates to any organisations for which a Board Member works for.

Even the appearance of a conflict of interest can be damaging to FiTI's reputation. Therefore, all FiTI Stakeholders must avoid situations that conflict with the best interests of the FiTI. If such a conflict of interest cannot be avoided, FiTI Stakeholders must disclose any actual or possible conflicts of interest relating to financial or non-financial benefits to the applicable governance body, as outlined in section 'Disclosing and addressing conflicts of interest' of this Code.

AVOID OR DISCLOSE  
CONFLICTS OF INTEREST

## PROFESSIONAL CONDUCT

FiTI Stakeholders shall dedicate themselves to perform their assigned duties with respect and confidence in an effective, cost-sensitive and timely manner, in particular:

using FiTI services, resources, equipment, or property in a cost-efficient and environmental-friendly way and for FiTI-related purposes only, while adopting a responsible behaviour in the use of resources and property dedicated to the FiTI, including care to using materials sparingly, recycling, disposing waste and avoiding waste;

RESPONSIBLE USE  
OF RESOURCES

making their best efforts to regularly participate in relevant professional activities implied by their role;

PARTICIPATION

being mindful not to use other than in the furtherance of their duties any information that they receive in the discharge of their duties to the FiTI and which is not already in the public domain (in any manner);<sup>2</sup>.

CONFIDENTIALITY

[2] FiTI Stakeholders continue to be bound by this obligation for two years after termination of their mandate.



not accepting funds or favours that might impair the independence and reputation of the FiTI, or that are granted under condition or structured in such a way that a FiTI Stakeholder's independence of action would be limited or infringed;

FINANCIAL  
INDEPENDENCE

being at all times transparent both in their personal relationship to FiTI and in official dealings on behalf of FiTI.

TRANSPARENCY

# DISCLOSING AND ADDRESSING CONFLICTS OF INTEREST

With regards to a **national FiTI implementation**, FiTI Stakeholders shall declare any actual or perceived conflicts of interest to the Chair of the FiTI National Multi-Stakeholder Group, as soon as they become aware of the situation, at a minimum prior to any meeting, decision or transaction.

How such a declared conflicts of interest is addressed will depend on the bylaws of the FiTI National Multi-Stakeholder Group (e.g. Terms of Reference) and the nature of the decision itself.

With regards to the **international administration** and governance of the FiTI, FiTI Stakeholders shall declare any actual or perceived conflicts of interest to the following governance bodies as soon as they become aware of the situation, at a minimum prior to any meeting, decision or transaction, as outlined below:

**Actual or perceived conflicts of interest regarding the international administration of the FiTI, which falls under the responsibility of the FiTI International Secretariat, such as:**

- **recruiting personnel for the FiTI International Secretariat,**
- **hiring consultants to support FiTI national implementations (e.g. FiTI Report Compilers),**
- **engaging partner organisations (even on a pro-bono basis),**
- **seeking financial support from donors.**

Actual or perceived conflicts of interest related to such aspects among employees of the FiTI International Secretariat (except the Executive Director), consultants and advisors of the FiTI International Secretariat shall be referred to the Executive Director of the FiTI International Secretariat.

Actual or perceived conflicts of interest related to such aspects by the Executive Director of the FiTI International Secretariat shall be referred to the Chair of the FiTI International Board.

**Actual or perceived conflicts of interest regarding the international administration and/or governance of the FiTI which falls under the responsibility of the FiTI International Board, such as:**

- **appointing members of the FiTI association's Executive Committee;**
- **engaging an external audit company;**
- **appointing the Executive Director of the FiTI International Secretariat;**
- **appointing new members of the FiTI International Board;**
- **making decisions regarding the status of a FiTI implementing country.**

Actual or perceived conflicts of interest related to such aspects (where applicable) among employees of the FiTI International Secretariat (including the Executive Director) consultants and advisors of the FiTI International Secretariat shall be referred to the Chair of the FiTI International Board.

Actual or perceived conflicts of interest related to such aspects by Board Members of the FiTI International Board shall be referred to the Chair of the FiTI International Board.

Declared conflicts of interest are either addressed by the Executive Director of the FiTI International Secretariat or by the Chair of the FiTI International Board, as outlined above. The evaluation may either determine the absence of a conflict of interest, or it may lead to the conclusion that:

- the person facing a potential conflict of interest should extricate her/himself from the situation that has been evaluated and found to be a conflict of interest, or
- the person should recuse her-/himself from participating in work or decision-making processes related to the situation found to be a conflict of interest.<sup>3</sup>

All decisions must be recorded in writing, even when a conflict of interest has been assessed as not harmful to the FiTI or otherwise improper.

[3] While FiTI Stakeholders may not be invited to participate in a particular discussion or vote, it can still be decided to hear their opinion before making a decision. Recusing means that FiTI Stakeholders cannot vote on the matters affected by those interests, nor will they be counted when deciding whether the meeting is quorate for the purpose of discussing and deciding on those matters

# VOICING CONCERNS, INTERPRETING AND APPLYING OR ADDRESSING VIOLATIONS TO THIS CODE

With regards to a **national FiTI implementation**, FiTI Stakeholders shall first raise any concerns about an interpretation, application or suspected violation of this Code to the Chair of the FiTI National Multi-Stakeholder Group.

In case the Chair of the National Multi-Stakeholder Group is unable to resolve the concern, or a FiTI Stakeholder is not comfortable raising such a concern directly with the Chair of the FiTI National Multi-Stakeholder Group, it shall be raised to the FiTI National Lead, as long as the FiTI National Lead is not also acting as the Chair of the FiTI National Multi-Stakeholder Group. Only in case the matter cannot be resolved or addressed by either the Chair of the National Multi-Stakeholder Group or the FiTI National Lead, the matter shall be raised to the FiTI International Board through the FiTI's global 'Compliance Channel'. The FiTI's procedures for voicing concerns to the attention of the FiTI International Board are open to all stakeholders and are available on the FiTI website.



With regards to the **international administration or governance** of the FiTI, FiTI Stakeholders shall raise any concerns about an interpretation, application or suspected violation of the Code directly to the FiTI International Board via its Chair. If the concern involves the Chair of the Board, any interested party can bring the issues to the Executive Director of the International Secretariat, who can communicate the situation to the FiTI International Board. The Board can designate a Board Committee to review the issue and present its recommendation to the members of the Board, which will discuss it in a meeting in which the FiTI Chair will not be present.

The FiTI International Board and the National Multi-Stakeholder Groups, respectively, may establish Sub-Committees to deal with possible violations of the Code. These Sub-Committees will submit a recommendation to the FiTI International Board or the National Multi-Stakeholder Groups, respectively, which will make a final decision.

FiTI Stakeholders shall not discriminate nor be discriminated against or disciplined or reprimanded for reporting concerns or requesting guidance concerning the Code whether or not these concerns are established as valid or substantiated.

In some situations, disciplinary actions against a FiTI Stakeholder who violated this Code may be appropriate, including removal from the FiTI International Board or a FiTI National Multi-Stakeholder Group.

All decisions must be recorded in writing, even when a concern has been assessed as not harmful to the FiTI or otherwise improper.





# RESPONSIBILITY OF IMPLEMENTATION

The responsibility of implementing this Code lies with the FiTI International Board as well as the FiTI National Multi-Stakeholder Groups of implementing countries, as follows:

- Activities related to the **national FiTI implementation** process shall be conducted by the FiTI Multi-Stakeholder Group.
- Activities related to the **international administration** or governance of the FiTI shall be conducted by the FiTI International Board and the International Secretariat.

Activities to implement the Code shall ensure awareness, understanding and adherence to the Code, including the following:

- Providing guidance and advice and, if required, training on the interpretation and implementation of the Code;

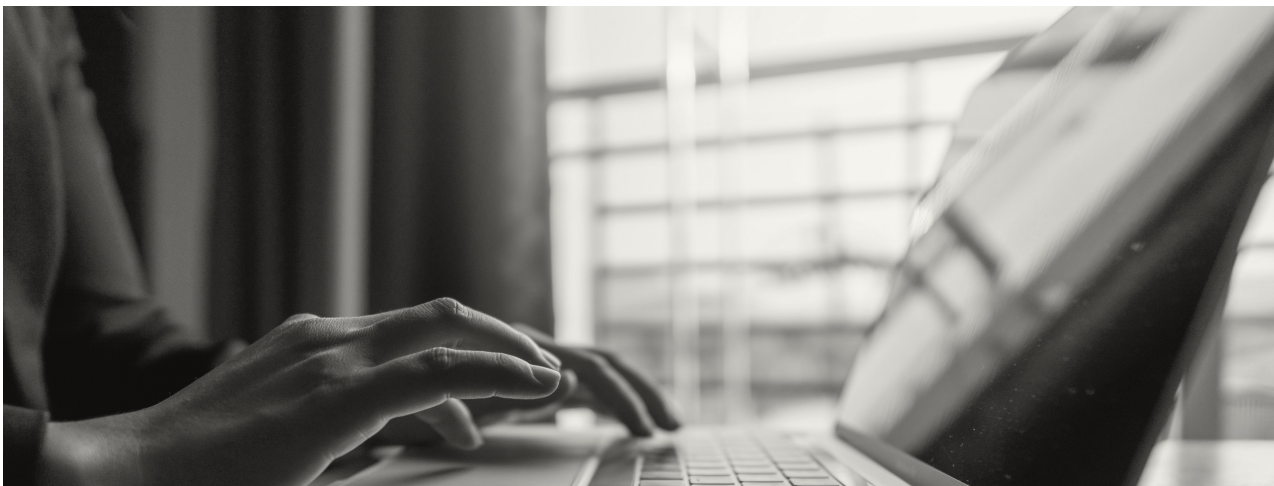


- Encouraging internal dialogues on the Code and wider good governance principles;
- Referencing the Code in relevant Terms of References or governing by-laws;
- Annexing the Code to all engagement documents, such as employment contracts, consulting contracts and designation letters of new Board Members, and requiring explicit acknowledgment that it has been received and read and that the person commits to abide by it;
- Adjudicating conflict of interest cases;
- Ensuring that internal systems, policies, and procedures are in place and consistent with this Code;
- Confirming that all relevant FiTI Stakeholders are familiar with the Code and, upon request, reporting on its implementation to the FiTI International Board through the International Secretariat;
- Referencing the Code on FiTI-related websites;
- Applying appropriate sanctions for non-compliance with the Code and seeking to resolve the issue that led to non-compliant behaviour.



# AMENDMENTS

The FiTI Code of Conduct is a living document and shall be reviewed regularly to ensure that the FiTI operates in a manner consistent with its charitable purpose and that FiTI Stakeholders do not engage in activities that could jeopardize its reputation or non-profit status. Amendments to the Code shall be discussed and approved by the FiTI International Board.





# CHANGE HISTORY

VERSION	DATE	DESCRIPTION
1.0	01 January 2019	Approval of the FiTI Code of Conduct by FiTI International Board during 5th International Board meeting (Decision ID: BM-05_2018_D-08).
2.0	13 July 2019	<p>Changes to the 'Avoid or disclose conflicts of interest' section.</p> <p>Changes to section 3, including clear provisions of disclosing conflicts of interest and implications for decision-making.</p> <p>Updates to section 4 regarding the procedures for voicing concerns.</p>



Fisheries  
Transparency  
Initiative

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