

# Ethics in SINTEF

2014

Ethics in SINTEF

[www.sintef.com](http://www.sintef.com)



2014

|                     |                     |
|---------------------|---------------------|
| SINTEF, Trondheim   | SINTEF, Oslo        |
| Postal address:     | Postal address:     |
| PO box 4760 Sluppen | PO box 124 Blindern |
| NO-7465 Trondheim   | NO-0314 Oslo        |
| Norway              | Norway              |

|                   |                   |
|-------------------|-------------------|
| Visiting address: | Visiting address: |
| Strindveien 4     | Forskningsveien 1 |
| Trondheim         | Oslo              |

|                         |                        |
|-------------------------|------------------------|
| Phone: +47 73 59 30 00* | Phone: +47 406 38 844* |
| Fax: +47 73 59 33 50    | Fax: +47 22 06 73 50   |

# Ethics in SINTEF



Revised by the Board of the SINTEF Foundation on February 25, 2013

## Contents:

|  |              |   |              |
|--|--------------|---|--------------|
| <b>Everyday Ethics</b>                                   | <b>6-7</b>   |   |              |
| <b>SINTEF's basic values</b>                             | <b>8-9</b>   |   |              |
| <b>Criteria for reaching ethically correct decisions</b> | <b>10</b>    |   |              |
| <b>To whom do the guidelines apply?</b>                  | <b>10</b>    |   |              |
| <b>What are ethics?</b>                                  | <b>10</b>    |   |              |
| <b>SINTEF's way of conducting business</b>               | <b>14-18</b> |   |              |
| - Relationships with suppliers,<br>partners and clients  | 14           |   |              |
| - Competence   | 14           |   |              |
| - Fair competition                                       | 15           |   |              |
| - Corruption and facilitation payments                   | 15           |   |              |
| - Minor payments   | 16           |   |              |
| - Employment of middlemen                                | 17           |   |              |
| - Public servants  | 18           |   |              |
| - Lobbyists  | 18           |   |              |
| - Correct information, accounting and reporting          | 18           |   |              |
| - Relations with the media                               | 19           |   |              |
| - Political activity                                     | 19           |   |              |
| - Equality and diversity                                 | 19           |   |              |
| <b>Personal conduct</b>                                  | <b>22-29</b> |   |              |
| - Research ethics in SINTEF                              | 22           |   |              |
| - Carrying out our business activities                   | 24           |   |              |
| • Property   | 25           |   |              |
|  |              | • Duty of confidentiality                                   | 25           |
|  |              | • Neutrality  | 26           |
|  |              | • Gifts   | 27           |
|  |              | • Loans and other benefits                                  | 27           |
|  |              | • Representation, travel, etc.                              | 27           |
|  |              | • Bribes and trading in influence                           | 28           |
|  |              | • Other work-related matters                                | 29           |
|  |              | • Personal convictions                                      | 31           |
|  |              | • Relations with the media                                  | 31           |
|  |              | • Insider trading   | 31           |
|  |              | • Information technology                                    | 32           |
|  |              | • Spouses/partners/close relatives                          | 32           |
|  |              | <b>The Ethics Council and<br/>the ethics representative</b> | <b>36-37</b> |
|  |              | <b>Non-compliance</b>                                       | <b>37-39</b> |
|  |              | - Dealing with possible non-compliance                      | 37           |
|  |              | - Consequences of non-compliance                            | 38           |
|  |              | - Follow-up   | 39           |
|  |              | <b>Declaration of responsibility</b>                        | <b>39</b>    |
|  |              | <b>Statutes of SINTEF's Ethics Council</b>                  | <b>42</b>    |
|  |              | <b>Instructions for SINTEF's ethics representative</b>      | <b>46</b>    |



## Everyday ethics

Ethics is a matter of accepting responsibility. In SINTEF, we face ethical challenges in our everyday work, in the way that we conduct business and in our contacts with colleagues, clients and other connections. Now and again, such challenges may leave us in an ethical dilemma, forcing us to make difficult decisions.

Our ethical guidelines are intended to help us in situations of this kind, and to act as our compass in such cases. The guidelines are renewed every year in order to ensure that they are always perfectly adapted to current developments in society and to the problems facing SINTEF.

By putting ethics even higher on SINTEF's agenda, we wish to create a company culture in which we openly discuss our ethical dilemmas. To support these efforts, we have set up an Ethics Council and appointed a Ethics Representative who will contribute guidance and advice, and ensure that ethical choices are made openly, even if we make mistakes.

While ethics is a managerial responsibility, SINTEF depends on each and every one of us taking personal responsibility for behaving ethically in the choices we have to make every day. I am completely confident that SINTEF's employees will accept this responsibility.

A handwritten signature in black ink, reading 'Unni M. Steinsmo'. The signature is fluid and cursive.

**Unni M. Steinsmo**  
President of SINTEF

## SINTEF's basic values

### *Our vision*

SINTEF's vision is "Technology for a better society". Our technology and skills will create a better society. We will work to increase welfare and wealth creation while paying regard to sustainable development, individual rights and collective solidarity.

### *Our background*

SINTEF is a Norwegian company that takes its societal responsibilities seriously. SINTEF shall have an open, friendly and inclusive corporate culture. Everyone shall be treated with courtesy and respect. It is expected that all employees live up to this standard. Our organisation incorporates the Norwegian society's standards and expectations. This also applies when operating in other cultures.

### *Basic values*

We will practise and promote our basic values of honesty, generosity, courage and solidarity. We create wealth in interaction with others. These basic values define our ambitions and our freedom of action in this field, and they will be made visible in our work.

### *Legislation and norms*

Our intentions and our conduct will never border

on the unacceptable regarding the issues mentioned above, nor in relation to applicable laws and regulations, including generally accepted research methodology and ethics.

### *Respect and integrity*

We acknowledge that the values of our colleagues and partners may differ from ours. We expect a mutual understanding of this fact and for its potential consequences. We will not become involved in activities that might compromise our values.

### *Our intentions*

In order to promote these values and realize our vision, we need to protect and develop our external values: economy, reputation and influence.

### *Ethical principles*

We base our ethical values on the four basic moral principles of human dignity<sup>1)</sup>, the "precautionary" principle<sup>2)</sup>, the principle of fairness<sup>3)</sup> and the principle of utility<sup>4)</sup>. These provide the foundations of the decisions we make.

---

<sup>1)</sup> "Never regard a human being as a means to an end, but always rather as an end in himself." (Kant)

<sup>2)</sup> "When human activity could lead to morally unacceptable damage that is scientifically reasonable but uncertain, we must take action that will avoid or reduce such damage." (The Norwegian Research Ethics Committees)

<sup>3)</sup> *We must attempt to make choices that are perceived as being fair to all interested parties.*

<sup>4)</sup> *«An action then may be said to be conformable to the principle of utility when the tendency it has to augment the happiness (benefit in modern language) of the community is greater than any it has to diminish it»*  
(Bentham)

### Management principles:

We recognise that management is important. Management does make a difference, so just how it is exercised is not a matter of indifference. In SINTEF, management will be clear, inspiring and inclusive, and will be practised in accordance with SINTEF's management principles.

## Criteria for making ethically correct decisions

Before we make decisions, of whatever type, we need to ask ourselves:

|  | Yes | No |
|--|-----|----|
| • Will anyone's life, health or safety be put at risk? |     | ✓  |
| • Could the environment suffer?                        |     | ✓  |
| • Is this legal?                                       | ✓   |    |
| • Does it feel right and honest?                       | ✓   |    |
| • Does it compromise trust and integrity?              |     | ✓  |

- Can I defend this in public? ✓
- Is it in conflict with SINTEF's vision, basic values or ethical principles? ✓

If you are unable to give a clear positive or negative response to these questions, you should take up the problem with your manager, ethics representative, or SINTEF's Ethics Council via its chair, as described under «Non-compliance on page 37.

## To whom do the guidelines apply?

The ethical guidelines described in this document apply to all employees and people actively involved in the SINTEF Group. The SINTEF Group's ethical guidelines also apply to members of governance and controlling bodies in their capacity of representatives. Hired personnel must accept our guidelines in writing.

## What are ethics?

Ethics comprise the norms and rules that must be obeyed to realise society's common values. We are compelled by our vision and social responsibility to defend and voice these norms and rules.

**Honesty**



As a research institution for the public benefit, the SINTEF Group's activities depend on trust of our employees, clients, suppliers, authorities and society in general. Trust can not be forced or demanded, but is something we earn. For this reason, we need to act attentively and honestly in our activities. Your conduct creates the basis of the image that people whom you meet will make of the entire SINTEF Group.

## SINTEF's way of conducting business

### **Relationships with suppliers, partners and clients**

The SINTEF Group will perform its activities in such a way that our partners, suppliers and clients can have complete confidence in us.

We expect and require our suppliers, partners and clients to share our ethical values. Suppliers involved in our activities must accept the SINTEF Group's ethical guidelines in writing.

### **Competence**

The overall level of competence of SINTEF is important to us.

It comprises our knowledge, ideas, structures, and working methods.

Such immaterial values must be protected and managed for the benefit of the SINTEF Group. At the same time, we must respect corresponding sets of values held by others.

### **Fair competition**

The SINTEF Group will compete on a fair and ethical basis within the framework of current rules of competition. We will not prevent others from competing with us. See: The Norwegian Competition Authority.

### **Corruption and facilitation payments**

Corruption entails bribing others or accepting a bribe in the shape of money, gifts or services, such that a person in a position of power gives another person advantages beyond those permitted by the regulations.



A corrupt relationship will have the following characteristics:

- Abuse of power by a person in a certain position within an organisation
- The person who commits such abuse gains advantages to which he is not entitled (bribes)
- The agreement between the parties involved is kept secret.

Corruption undermines confidence in a state governed by law and democratic institutions, weakens ethical and moral values, hinders rationalisation and efficiency and undermines all forms of business activity and free competition.

The SINTEF Group distances itself from all forms of corruption and will make active efforts to ensure that it does not occur in our commercial activity.

### **Minor payments**

Minor payments are usually made to ensure that a delivery is carried out or accelerate services to which one is entitled, e.g. permission to pass through passport control. The SINTEF Group distances itself from this type of payment, even

when it is legal. If such payments in certain situations are unavoidable, they must be entered correctly with specification of purpose.

The SINTEF Group will make efforts to prevent such payments.

### **Employment of middlemen**

Middlemen are agents, consultants, or others who in the course of our business activities act as intermediaries between the SINTEF Group and a third party.

Before any units in the SINTEF Group engage middlemen, inquiries must be made as to whether the reputation, background and skills of the person involved are appropriate and satisfactory. A written agreement must be made, and this agreement must at the very least satisfy the SINTEF Group's ethical guidelines, routines and checklist for this purpose. The tasks actually performed must always be documented as a basis for payment.

Agreements and contracts with intermediaries are to be approved by presidents/executive vice presidents

**Public servants**

Payments or the provision of other benefits to public servants, of whatever country, are not permitted.

**Lobbyists**

Lobbyists are a particular type of middlemen who are used to influence decision-making processes in both the private and public sectors.

SINTEF will only employ lobbyists as long as they make it quite clear to the person or body sought influenced that they represent SINTEF. In all contracts signed by SINTEF with a lobbyist, the latter will be obliged to provide such information.

**Correct information, accounting and reporting**

Business information about the SINTEF Group must be communicated accurately and completely both internally and externally.

Accounting information will be correct, registered and quoted in accordance with laws and regulations, including accounting standards.

**Relations with the media**

The SINTEF Group has an obligation to participate in the public debate with the knowledge we possess as a research organization. Our communication processes will be characterized by honesty, openness and accessibility. (Who may speak about any given topic is set out in SINTEF's Communications Strategy).

**Political activity**

The SINTEF Group's companies are neutral in party-political terms.

**Equality and diversity**

SINTEF shall value all humans equal.

No discrimination of any sort will be tolerated, whether on grounds of race, gender, religion, sexual orientation or age.

A close-up photograph of two hands held open, palms facing each other. The hands are positioned to hold the word "Generosity" in the center. The skin is a warm, golden-brown color, and the lighting is soft and directional, coming from the upper left, which creates highlights on the fingers and the palm of the right hand. The background is a blurred, light-colored surface, possibly a piece of fabric or a wall, which adds to the gentle and warm atmosphere of the image.

**Generosity**

SINTEF will make every effort to provide a good work environment that is characterised by mutual respect and equality of opportunities.

## Personal conduct

### **Research ethics in SINTEF**

For SINTEF to attain its objectives it must be a respected member of the international research community. Scientific research is based on trust. All our scientific activities will be based on internationally accepted research methodology and on relevant regulations. Any divergences from such practice must be clearly stated and reasons given. See: NENT (The National Committee for Research Ethics in Sciences and Technology).

Researchers rely on the reliability of other people's results. Any researcher must be cautious about using his professional authority outside his own field. Society relies on research being an honest attempt to describe the world accurately and objectively.

Maintaining this trust requires you to be conscious of the ethical rules that apply to research and live up to them:

### *You must conform to the rules*

Research results must be testable to ensure quality. You must document your methods and your findings understandably and completely. You must give reasons for your choice of methods, which must be in accordance with scientific working methods.

### *You must be honest*

You must present what you find; neither more nor less. When you use other people's results, you must acknowledge this fact and make sure you are permitted to use this information.

### *You must be firm*

You may face pressure from clients or others to modify your methods, findings, or conclusions. You must resist this type of pressure and discuss the matter with your superior.

*You must be generous*

As a researcher, you depend on other people's thoughts and ideas. Give credit to those on whose shoulders you are standing. Expect other people to give you credit for your contributions.

*You must be open*

Publication is the proof of membership in the international research community. Within the limits set by your duty of confidentiality, you should aim to publish our results.

*You must be aware*

SINTEF's vision, "Technology for a better society" is meant seriously. If you believe our activities or our results violate this vision, you must discuss this with your superior or the ethics representative.

**Carrying out our business activities**

All our employees must abide by laws and regulations and perform their work in accordance with SINTEF's requirements and standards.

SINTEF expects everyone to treat people they come

in contact with in the course of their work or work-related activities with courtesy and respect.

Everyone must refrain from conduct that could negatively affect colleagues, work environment or companies, and they must not behave in a way that could be perceived as offensive to local traditions and culture.

***Property***

Everyone must protect the tangible and intangible property of the SINTEF Group against loss, damage, and abuse.

***Duty of confidentiality***

We have a duty of confidentiality regarding all business matters and other matters that could give persons not concerned access to confidential information.

In principle, any business matters that have not been published are confidential.

The duty of confidentiality also applies in relation

to colleagues who do not require the information concerned for their own work.

Be cautious about discussing the internal affairs of the SINTEF Group in the presence of outsiders.

The obligation to maintain confidentiality does not hinder staff from informing their manager, ethics representative or chair of the Ethics Council about any situation within the organisation that they believe could be in conflict with relevant regulations.

### ***Neutrality***

You must not participate in or seek to influence a decision-making process under circumstances which could undermine trust in your independence. For this reason, you must never partake in discussions or decision-making processes regarding issues that are of particular or vital importance for you or someone close to you, so that you could be regarded as having personal or financial interests in the matter.

You must immediately inform your immediate superior if you discover a potential conflict of neutrality. If an

instance of partiality is established, you must withdraw from any further dealings with the matter.

### ***Gifts***

Exercise caution when offering and accepting gifts or other services that could influence business-related decisions.

Common polite gestures are permitted. Be cautious regarding local customs.

### ***Loans and other benefits***

Employees must not borrow money or accept other benefits from the SINTEF Group's connections with which she or he has contact with through work, with the exception of normal private banking relationships.

### ***Representation, travel, etc.***

Representation on behalf of SINTEF will be characterized by sobriety<sup>5)</sup>. Nobody may organise or participate in entertainment or any other representation that could be perceived as disproportionate.

---

<sup>5)</sup> State expense rates for hospitality or entertainment

Employees who represent SINTEF should behave with dignity and in a manner that inspires confidence. Exercise moderation when drinking alcohol.

In countries where service is included, e.g. in restaurant and taxi bills, tips may be given according to local standards.

Employees may not accept travel benefits or arrangements paid for by suppliers, cooperating organisations or competitors without the prior permission of the Executive Vice President.

Work-related travel and accommodation will be reimbursed by SINTEF even when these will subsequently be paid for by others.

### ***Bribes and trading in influence***

SINTEF does not offer or accept bribes.

Bribery occurs when an attempt is made to influence a person by virtue of his/her position through the provision of an improper benefit; such benefit may encompass something other than money.

Trading in influence exist when someone is given an improper advantage to influence the execution of a third party's position, duty or commission.

The ban on bribes and trading in influence affects those who give and those who offer, and those who demand, receive or accept an improper advantage. It is sufficient that a demand or an offer of an improper advantage has been made in order for the affair to be illegal. There is no requirement that the improper advantage is intended to benefit the person who could be influenced. The ban on bribes and trading in influence applies both to the public and private sectors.

Bribes and trading in influence are subject to the General Civil Penal Code.

### ***Other work-related matters***

*Ownership interests, etc.*

Employees with significant or decisive ownership interests in enterprises enjoying a client or supplier relationship with the SINTEF Group must report this to the Executive Vice President. This also applies to

persons close to the employee. If the ownership could raise doubts regarding the employee's loyalty or independence, a time limit may be set to terminate the ownership or client/supplier relationship.

#### *New companies*

One of the SINTEF Group's goals is to create new enterprises as employees go out and establish their own businesses. Nobody remaining an employee in the SINTEF Group may own or have share options in such new enterprises. Employees may hold board positions in such companies when approved by the Executive Vice President.

#### *Other paid work, etc., outside SINTEF*

We expect working for SINTEF to be our employees' main occupation. Employees may not find other paid work or run business activities of a certain size without the written permission of the Executive Vice President. Exam-marking at universities or colleges is not affected by this rule.

Employees may not hold positions of trust in companies without the written consent of the Executive Vice President.

#### ***Personal convictions***

Employees have the right to refuse to participate in projects whose content is in conflict with their religious or ethical convictions.

Employees, who for this reason can not participate in substantial parts of the tasks assigned to their department, thus making it difficult to employ them, must accept that their refusal may have consequences for them.

#### ***Relations with the media***

Employees are encouraged to participate in the social debate with their personal opinions in all areas. However, nobody may use their title or position in SINTEF in such a way as to bring third parties to believe that SINTEF as an organisation supports the opinions they offer.

#### ***Insider trading***

In the course of our work, we may obtain information or knowledge related to matters that, if they became public knowledge, might significantly affect the value



of stocks and shares. Such information must never be passed on or used for private gain.

### ***Information technology***


Employees' use of computer systems, information and particularly Internet services must be restricted to business-related needs.

Information that could be perceived as offensive or improper must never be downloaded, stored or disseminated.

Information stored in SINTEF's servers outside the private area is the property of SINTEF.

### ***Spouses/partners/close relatives***

Spouses, cohabiting couples, close relatives or other close personal relations, both of whom are employed by SINTEF, are not permitted to report directly to one another. The term "close relatives" comprises parents, children and siblings. No-one may allow private relationships to influence their actions or attitudes related to their work situation, including their treatment of confidential information.

A close-up photograph of two clenched fists, one on the left and one on the right, set against a light, neutral background. The fists are tightly clenched, with the knuckles and fingers clearly visible. The skin tone is a warm, golden-brown color. The lighting is soft, highlighting the texture of the skin and the contours of the hands. The word "Courage" is printed in a bold, black, sans-serif font between the two fists.

**Courage**

## The Ethics Council and the ethics representative

SINTEF's Ethics Council is appointed by the Board of SINTEF. The Council has adopted the organization's ethical guidelines as a basis for encouraging a high level of consciousness and conduct regarding ethics in all SINTEF employees, in order to ensure that SINTEF and its employees enjoy a good reputation in this field. The responsibility for SINTEF's ethical standard lies with SINTEF's leaders.

The Ethics Council provides advice and guidance regarding questions of ethics to the Board, administration and subsidiary companies of the SINTEF Group, and is a centre of expertise regarding experience of matters of ethics. The Council is responsible for maintaining our ethical guidelines and can offer suggestions regarding possible changes in these guidelines. The Council is entitled to submit cases that touch on important ethical questions to the Board of SINTEF.

The Council can deal with specific cases at the request of SINTEF's Board, management, the ethics

representative, employees or trade-union representatives.

The ethics representative provides guidance and advice to SINTEF's staff and trade-union representatives in matters that involve ethics, including problems covered by SINTEF's ethical guidelines, and is available for questions from, and discussions with, employees regarding questions of ethics. The ethics representative normally participates in meetings of the Ethics Council.

## Non-compliance

### **Dealing with possible non-compliance**

Any question or concern regarding the rules mentioned above, in connection with any action performed in the past or present, or may perform in the future, can be discussed with your superior.

Cases of doubt and breaches of SINTEF's ethical guidelines should immediately be discussed with your

superior. If you find this difficult, you may discuss the matter with SINTEF's ethics representative or with the Ethics Council via the leader of the Council. The ethics representative has a duty of confidentiality.

On its own initiative or at the request of anyone in SINTEF, the Ethics Council may address cases of possible breaches of SINTEF's ethical guidelines.

SINTEF's companies will not sanction employees who alert the public about possible breaches of SINTEF's ethical guidelines, current legislation or other blameworthy circumstances related to SINTEF's activities.

### **Consequences of non-compliance**

Breaching the SINTEF Group's ethical guidelines may have consequences for your employment. Serious breaches may result in a notice or dismissal. We emphasise that similar breaches will produce similar reactions, irrespective of position in the organisation.

Any resulting reactions and injunctions should be reported back to the Ethics Council.

### **Follow-up**

SINTEF's boards of directors require staff at all levels of the organisation who have relevant responsibilities to follow up and ensure that the regulations are observed, and that our companies' top-level management teams assess the appropriateness of the regulations on an on-going basis. Staff who have doubts about the regulations are required to take up such problems with their immediate superior.

## Declaration of responsibility

This document does not create rights for clients, suppliers, competitors, shareholders, or any other persons or units.

A close-up photograph of two hands shaking in a firm, supportive grip. The hands are positioned horizontally across the frame, with the fingers interlaced. The skin tone is a warm, light brown. The background is a soft, out-of-focus light beige color. The word "Solidarity" is printed in a bold, black, sans-serif font on the left hand.

**Solidarity**

## Statutes of SINTEF's Ethics Council

### § 1.

#### **Objectives**

SINTEF's Ethics council will assist and advise the SINTEF Group's management and employees regarding questions of ethics. Based on the SINTEF Group's values and ethical guidelines, the Ethics Council will contribute to conscious attitudes to ethical dilemmas and thus promote ethical conduct. Responsibility for SINTEF's ethical value system lies with its Board of Directors. The implementation and follow-up of ethical behaviour is the responsibility of line management.

### § 2.

#### **Appointment**

SINTEF's Ethics Council is appointed by the Board of SINTEF for a period of two years, on the recommendation of SINTEF Management.

The Council comprises six members, without deputies.

Three members are appointed by the Management from among its own members. The other three are the staff representatives from the Board of SINTEF. The President of SINTEF is entitled to participate in Council meetings.

### § 3.

#### **Duties**

The Ethics Council provides advice and guidance to the Board and management of SINTEF on ethical problems related to SINTEF's activities.

Suggestions from the Board or the administration regarding changes in the ethical guidelines shall be presented to the Ethics Council in advance.

On its own initiative or at the request of the Board, the administration, employees or representatives, the Council may take up issues concerning possible breaches of SINTEF's ethical guidelines, or address other circumstances associated with ethical matters of importance to SINTEF's activities.

Similar powers also apply to SINTEF's subsidiary companies.

Every year, the Council will present a report on ethical questions to the Board and the leader of the Council.

## § 4.

### **Proceedings**

The Ethics Council normally meets four times a year. Additional meetings of the Council may also be convened as necessary.

The Ethics Council elects a chair and a deputy chair of the Council, both for one-year terms.

The Council chair is responsible for convening meetings of the Council, preparing matters for discussion and leading the Council's meetings.

Minutes of the Council's meetings will be taken.

The President of SINTEF will provide adequate

secretarial support for the work of the Council.

## § 5.

### **Ethics representative**

If a separate ethics representative is appointed in SINTEF, she or he has the right to participate in meeting of the Council and to submit matters for discussion.

Ethics representatives are appointed by the President of SINTEF after consultation with our employee organisations. The ethics representative is appointed for a period of three years, with the possibility of extension of this period.

## § 6.

### **Changes**

Changes to the statutes of the Ethics Council must be approved by the Board.

## Instructions for SINTEF's ethics representative

### 1. Introduction, objectives

The ethics representative in the SINTEF Group shall contribute to ensuring that all aspects of SINTEF's activities maintain a high ethical standard. The ethics representative will therefore assist employees in matters related to ethics, assist SINTEF's Ethics Council and in general support efforts related to ethics throughout the SINTEF organization.

### 2. Reporting

The ethics representative is appointed by the President of SINTEF following consultation with employee organisations. The new duties of the ethics representative must be taken into account in considerations of her or his work situation. The ethics representative is placed under the President's management prerogative with the exceptions of the regulations concerning duty of confidentiality described in item 4 above.

The ethics representative reports to SINTEF's Ethics Council as regards work tasks and questions related to the follow-up of these work instructions. Between the Council's meetings, the ethics representative reports to the leader of the Ethics Council. The ethics representative is entitled to approach the Chairman of the Board.

The ethics representative reports to his closest leader as regards other tasks and questions not covered by these instructions. Personnel responsibility for the ethics representative lies with her or his closest line manager.

### 3. Duties

The ethics representative offers advice and guidance to SINTEF's employees and trade-union representatives in matters that involve ethics, including problems covered by SINTEF's ethical guidelines, and is available for questions from, and discussions with, employees regarding questions of ethics.

The ethics representative takes the minutes of the meetings in the Ethics Council and is responsible for



keeping these minutes in a satisfactory manner that protects the confidentiality of personal information.

The ethics representative has the right to participate in meetings of the Ethics Council and is entitled to submit cases for its consideration, including suggestions regarding possible changes to SINTEF's ethical guidelines.

The ethics representative shall submit for the Ethics Council's consideration matters presented by employees or trade-union representatives in SINTEF, and that the ethics representative in consultation with the person presenting the matter finds impossible to solve otherwise, always provided that the matter in other respects is suitable for treatment by the Ethics Council.

The ethics representative must report to the Ethics Council any significant circumstances that could weaken SINTEF's reputation, including breaches of law and public regulations, breaches of SINTEF's regulations and breaches of SINTEF's ethical guidelines that have not previously been reported to or duly followed up by the administrative management.

The ethics representative is responsible for establishing and following up a system of notification in the shape of an e-mail service or a separate web page that will enable employees and trade-union representatives in SINTEF to discuss or report ethical concerns or problems. The ethics representative is entitled to make use of SINTEF's administrative and technical resources as regards the technical establishment and maintenance of such a system.

The ethics representative's duties according to this rule also apply vis-à-vis employees and trade-union representatives in SINTEF's subsidiary companies.

#### **4. Duty of confidentiality**

The ethics representative owes a duty of confidentiality regarding cases being considered by the Ethics Council, unless the Council has decided to make its opinions available to others.

Furthermore, the ethics representative owes a duty of confidentiality as regards the identity and position/duties of employees and trade-union representatives who have reported matters to the ethics

representative, unless this employee or trade-union representative has given his consent to revealing his identity and/or position/duty in connection with the further consideration of the matter. This duty of confidentiality also applies vis-à-vis the Ethics Council and to the President of SINTEF and the ethics representative's other superiors.