

Code of Conduct

1. Introduction

CoST, the Infrastructure Transparency Initiative, is a registered charity with the Charity Commission for England and Wales. As such, CoST has a responsibility to ensure compliance with the UK regulations, including safeguarding and other related matters. This document is part of CoST's safeguarding framework. The other documents in this framework are:

- Complaints procedure
- Safeguarding policy
- Safeguarding procedure
- Whistleblowing policy and
- Anti-trafficking policy and plan

In keeping with its vision and values, CoST is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated partners. To help increase understanding, this Code of Conduct details CoST's expectations of associated personnel and delivery partners.

2. Scope and purpose

This Code of Conduct applies to all CoST Board Members and all CoST International Secretariat staff, contractors (associated personnel) and sub-grantees (delivery partners).

The purpose of this Code of Conduct is to set out the conduct expected of associated personnel and delivery partners whilst under contract to the organisation, and forms part of all contracts. An adapted Code of Conduct model will be proposed to the associated partners. The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

Whilst recognising that local laws and cultures differ considerably from one country to another, CoST is an International Non-Governmental Organisation, and therefore the Code of Conduct is developed from international and UN standards. Associated personnel and delivery partners are expected to uphold local law wherever they operate, except where the Code of Conduct is more stringent, in which case the Code applies.

In addition, it is expected that all CoST Members, specifically the host organisation staff and contractors, and Multi-Stakeholder Group Members, consider this Code of Conduct and its relationship to any national and institutional regulations, policies, and requirements as part of their CoST programme.

3. Mission and values

CoST's mission is to enable a multi-stakeholder approach in the disclosure, validation and use of infrastructure data. This improves transparency, participation, and accountability, and contributes to a quality infrastructure that meets people's needs.

The values are endorsed by the CoST board, the International Secretariat, MSG members and member secretariats are:

a. Transparency & Accountability

- We are open and transparent in everything we do, building trust and accountability with our stakeholders.

b. Collaboration & Partnership

- We work in partnerships to maximise our impact.
- We have the humility to listen and learn from others to ensure we are doing the right thing.
- We respect the knowledge and resources of different people and groups.
- We are adaptable and flexible, recognising innovative thinking and solutions.

c. Participation

- We are inclusive in our approach, building and supporting participatory processes and inclusive decision-making, which values the voices of all stakeholders.
- We promote equality and inclusion through a multi-stakeholder approach that provides a safe space and free speech for civil society, private sector and government actors.

4. Code of Conduct Standards

As a CoST-associated personnel or delivery partner, I will:

a. Personal behaviour, integrity and values

Endorse CoST's principles and values, observe the highest standards of integrity and ethical conduct, and act with honesty and propriety at all times. I accept the responsibility of leading by example and undertake to conduct myself in ways that build trust and confidence in CoST.

b. Respect for others

Treat everyone with dignity and respect. I also acknowledge the authority and responsibilities of individuals holding public office, those professionally appointed, those contractually obligated, and those in positions of leadership.

c. Use of resources

Ensure that resources are used efficiently, economically and effectively, avoiding waste and extravagance and in fulfilment of our obligations to our supporters.

d. Gifts and hospitality

Do not canvass for or seek gifts. Neither do I accept gifts or hospitality which might, or might reasonably appear to, compromise my personal judgement or integrity or place us under an improper obligation. I am responsible as an individual to ensure that any gifts or hospitality accepted can withstand public scrutiny and do not bring CoST into disrepute. In case of doubt about whether a gift or hospitality is excessive, I will consult the CoST International Secretariat, the CoST Member Secretariat, or the relevant Multi-Stakeholder Group.

e. Confidentiality

Do not use any information that is acquired through my involvement in CoST and is not already in the public domain in any manner other than for the benefit of CoST. Neither do I disclose any personal information about others involved in CoST that was learned in the course of CoST activities, without the explicit permission of those individuals.

f. Conflicts of interest

Accept responsibility, ensure that no conflict arises, or could reasonably be perceived to arise, between my responsibilities to CoST and my private interests, financial or otherwise. If I see potential for a conflict of interest, I will consult with the relevant multi-stakeholder group or the CoST International Secretariat.

5. Complaints and reports

Associated personnel and delivery partners are obligated to bring to the attention of the relevant manager any potential incident, abuse, or concern that they witness, become aware of, or suspect that appears to breach the Standards contained in this Code. CoST-associated personnel and delivery partners reporting concerns are protected by the Whistleblowing policy.

Associated personnel and delivery partners who have a complaint or concern relating to a breach of the Code should report it immediately to their line manager. If the staff member, contractor, or supplier does not feel comfortable reporting to their line manager or focal point of contact (for example, if they believe the report will not be taken seriously, or if that person is implicated in the concern), they may report to any other appropriate senior manager.

Associated personnel and delivery partners who receive reports or concerns are obliged to act on or refer them immediately, in accordance with the CoST Complaints Policy and procedures.

6. Associated policies

Safeguarding policy

Whistleblower policy

Complaints policy

Procedures for response to safeguarding concerns

Anti-trafficking policy and plan

In accepting my appointment, I undertake to discharge my duties and to regulate my conduct in accordance with the requirements of this Code.

Name:

Signature:

Date:

This Policy will be reviewed every five years by the Board.

Approval date	Changes made	Review date
24/11/2025	<p>Extracting content from the principles and values documentation</p> <p>Adapting the content to be signed by individuals associated with CoST as staff or contractors.</p>	10/03/2025 and 10/11/2025

Annex Glossary of Terms

Safeguarding

In the UK, safeguarding means protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect.¹

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults, from that harm; and to respond appropriately when harm does occur.

Code of conduct

Sets out the conduct expected of CoST staff, contractors, suppliers and associated partners. Associated partners include, but are not limited to, the following: CoST Member host organisation staff, partners, MSG Members, volunteers, and programme visitors, including academics, journalists, and public officials.

Whistleblowing policy

This policy outlines CoST's commitment to non-retaliation against staff members who report malpractice and the procedures for investigating such reports.

Complaints policy

This policy sets out CoST's commitment to receive and respond to complaints. It governs the procedures to respond to complaints.

Procedures for response to safeguarding concerns

This is a set of procedures outlining how to handle reports of breaches of the CoST safeguarding policy.

¹ NHS 'What is Safeguarding? Easy Read' 2011