

## RIPE NCC Code of Conduct

**Date:** January 2024

### Scope of the Code of Conduct

The RIPE NCC's Code of Conduct outlines how we expect our employees to behave internally and to represent the organisation externally. The RIPE NCC's reputation is founded on trust and accountability. Our members expect that we uphold these principles, and we expect that of everyone that works for and with us. The RIPE NCC also pursues honest and law-abiding relationships with external parties. We therefore expect external parties that work with the RIPE NCC to apply the values of this Code of Conduct or apply their individual codes of conduct that are consistent with our own.

The RIPE NCC Code of Conduct applies to all employees of the RIPE NCC, Employer of Record-staff of Remote, Consultants and interns (hereinafter 'employees') working within the organisation. We expect that all of you will act as ambassadors of this organisation, using your best judgement in your application of this Code of Conduct in your daily work – not only to prevent malpractice but to promote good practice.

Violations of this Code of Conduct and other RIPE NCC internal policies can lead to disciplinary sanctions. We thereby encourage employees to speak up should they have questions or doubts as to the application of this Code of Conduct, in order to prevent violations.

*Note: the term "Manager" and "People Lead" are interchangeable in this document.*

### Vision, Mission and Values

#### Vision

Together, let's shape the future of the Internet

#### Mission

- As an authority on unique Internet number resources, we enable people to operate and develop the Internet.
- As the Secretariat for the RIPE community, we are a trusted steward of the open, inclusive, collaborative Internet model, engaging and connecting people and communities.
- As a neutral source of information and knowledge, we actively contribute to the stability and evolution of the Internet.

## Values

Our values are integral to everything we do at the RIPE NCC. The Code of Conduct provides specific instructions for staff on expected behaviours. Incorporating these core values into daily work practices is something that can help to further ensure that staff are meeting these expected behaviours.

We are trustworthy	We are open	We are inclusive	We are caring
We build trust and confidence through our competence, reliability, integrity and empathy.	We work in an open and transparent way. We communicate our plans, actions and results in a clear and direct way. We give feedback honestly and constructively.	We value diversity in our people and community and treat them fairly, respectfully and equally. We seek out and respect differences and variety in ideas and opinions.	We care about each other, we care about our members and community, and we care about doing a good job.

### 1. A Safe and Supportive Workplace

We work in an open space together – this means we must all work to foster an environment where we can work productively while embracing the social aspects that an open office offers. The RIPE NCC strives to ensure safe and healthy working conditions for all employees. Yelling, threats, damaging property, disturbing behaviour, and other acts of violence are strictly forbidden.

Employees are also entitled to work in an environment free of undue negativity and malicious gossip. Take care not to spread unsubstantiated rumours or otherwise encourage negative behaviours and attitudes. Also take particular care in how you talk to colleagues over group staff communication channels, e.g. internal mailing lists and chat channels. Passive aggressive, sarcastic or unduly negative language in relation to colleagues or their work creates a negative atmosphere and culture, and it can be personally distressing to colleagues.

### 2. Discrimination, Harassment and Bullying

We are committed to encouraging diversity among our employees, in a professional environment in which employees trust and respect one another. The RIPE NCC categorically rejects all forms of forced labour.

All employees are entitled to a safe, supportive and enjoyable work environment and so the RIPE NCC has a zero-tolerance policy for discrimination, (sexual) intimidation, aggression, harassment and bullying.

The definitions of the Dutch ARBO law are our reference point in identifying such behaviour. The legal definitions are described here: [Definitions Dutch ARBO Law.pdf](#)

In addition to the legal definitions, we identify the following behaviour as bullying and harassment, discrimination and (sexual) intimidation:

**Bullying and harassment:** repeatedly, unwanted negative behaviour, where the victim cannot defend him/herself. The harassment can occur by the use of wording, gestures, facial expressions and/or physical contact. It is hurtful to the victim, who feels compromised in his/her dignity.

**Discrimination:** unequal treatment, disadvantage or exclusion of people based on personal characteristics. An employee who is discriminated against is treated differently from others and it can affect his/her employment conditions.

**(Sexual) Intimidation:** any form of unwanted sexual rapprochement, requests for sexual favours or other sexual-tinged verbal, non-verbal or physical behaviours in the work environment that are experienced as undesirable.

This includes all channels of communication in the office: face-to-face, telephone, email, company chat software and social media. If you are at the receiving end of this behaviour or witness it, we strongly encourage you to express your concerns towards the person who is violating or report the incident officially via the channels mentioned in section 12.

### 3. Conflicts of Interest

Many of us have access to confidential membership data and business-critical information. Upholding the trust of the RIPE NCC's members is mission critical for this organisation.

All RIPE NCC employees will be expected to refrain from personal activities and financial interests that could conflict or negatively influence their professional responsibilities towards the organisation. You may not use your position at the RIPE NCC to generate or accumulate benefits for yourself.

When you find yourself in a situation where competing loyalties present themselves, you may make decisions that could have a negative impact on the company. If you have any doubts about whether a decision could be a conflict of interest, the safest course of action is to discuss this with your manager **before** a decision is taken. You will not be disadvantaged for having flagged a potential conflict of interest.

You could also be approached by people at a meeting, conference or other event outside of the office. Make sure that the information you share is based on published procedures and that your information is in line with the overall company message. If the information you reveal benefits another party at the expense of the RIPE NCC, it could be that you are acting in a conflict of interest. Again, if you have any doubts about whether a decision could be a conflict of interest, discuss this with your manager.

#### 4. Bribes and Fraudulent Activity

Working with confidential information could also put you at risk of bribery. Bribes are undue rewards to secure a business advantage (financial or otherwise) and will involve the giver and the receiver in the improper performance of a personal, professional or official responsibility. A bribe can take any form, e.g. a gift, a payment, but also a favour of anything with material value, if it is enough to have an influence on your judgement.

Accepting bribery or not reporting bribery attempts will make you susceptible to blackmail.

Violations of anti-corruption and anti-bribery laws may have significant civil and criminal penalties for the RIPE NCC and its employees, including fines and imprisonment. They also put our reputation and hard work at risk, by triggering negative media coverage or causing us to lose trust among the members and community we serve. Such actions can also have implications for our contractual relationships with third parties, resulting in unenforceable or cancelled contracts.

If you are ever approached with a bribe offer or a request to reveal insider information, escalate this **immediately** to your manager or a senior manager.

##### 4.1 Accepting Gifts, Entertainment and Other Perks

Sometimes employees receive gifts from external colleagues and this may be used as a bribe in order to improperly influence the performance of personal, professional or official duties. Such a gift may also be interpreted as a bribe, and this is enough to be prejudicial to our organisation.

This is why you may only accept a gift if the estimated retail value is less than EUR 35 (this includes dinners, tickets to events or conferences, bottles of wine, etc.). If the gift has an estimated value higher than EUR 35, please discuss accepting the gift with your manager or People Partners. We realise that the exact retail value of a gift is not always clear and that in some circumstances, it may be rude to refuse a gift. We trust you to make an estimation based on common sense and discuss the situation with your manager or People Partners.

## 4.2 Trading IP addresses

RIPE policies and RIPE NCC procedures allow the transfer of Internet Number Resources (INRs) such as IPv4, IPv6 and AS Numbers. Transfers of IPv4 addresses have become a lucrative trade opportunity for some organisations due to IPv4 scarcity.

As a Registry, our role is to facilitate the transfer of INRs between resource holders and maintain correct registration information, within our procedural framework and after a due diligence process. We have no involvement in the financial or trading parts of the resource transfer.

Employees of the RIPE NCC are not allowed to actively trade INRs and/or share confidential insider information about the resources, the RIPE NCC and its procedures with any broker or person active in transferring INRs. When a trade is influenced by insider information, this can be seen as illegal insider trading, which can lead to a high liability risk for the RIPE NCC.

This clause has an after-effect of six months after the end of the employment agreement.

## 5. Anti-Money Laundering

We are committed not to cooperate, directly or indirectly, with money laundering activities and to prevent financial crime and the facilitation of criminal activities.

This Code of Conduct, in line with applicable anti-money laundering laws, prohibits (the attempt of) money laundering, i.e. transferring illegally obtained funds – the proceeds of criminal activities – through legitimate entities or accounts so that the funds' original source cannot be traced. There are multiple schemes used to turn “dirty money” into “clean money”, so employees should look out for related red flags when dealing with external parties.

If there are suspicions that a proposed or ongoing transaction may involve criminal proceeds, you must escalate this **immediately** to your manager or a senior manager.

## 6. Financial Integrity and Fair Competition

Within our Financial Governance, we outline standards of behaviour for employees in the operations of the organisation, to ensure transparency. The RIPE NCC's financial accounts and supporting documents describe and reflect the nature of the RIPE NCC's transactions. We apply the principles of fair competition in our financial governance and contract management, and we adhere to all applicable (inter)national competition laws and regulations. If you suspect violations of the principles of fair competition, you must escalate this **immediately** to your manager or a senior manager.

## 7. Sanctions

In every country in which the RIPE NCC operates, specific laws and regulations govern sanctions and trade embargoes, to which we are committed to complying.

To manage our sanctions exposure, we have implemented controls and processes including screening and due diligence on the external parties we interact with, before accepting them as RIPE NCC members. If you suspect an organisation or person we are engaged with or could potentially become engaged with is subject to sanctions that apply to the RIPE NCC, you should inform our Legal Team and/or your manager as soon as possible.

### 7.1 Employee Sanction Screening

#### Background

To be compliant with the sanctions law, we currently screen our members to check if sanctions are applied to individual persons. The recommendation is that we would apply this procedure to our employees as well. We looked for alternative approaches and implemented the requirement to have a Dutch/EU bank account, since these banks apply sanctions checks regularly.

#### Policy

All employees and consultants working for the RIPE NCC in the Netherlands/EU, are required to have a Dutch/EU bank account in which they receive payments. Employees and consultants who do not comply with this will be annually screened via the Dow Jones sanctions screening portal the RIPE NCC uses to screen members. This will be done by People Partners.

## 8. Confidentiality, Personal Data and Privacy

We are committed to handling data responsibly, in internal and external communications, whether it is face-to-face, by telephone, letter, e-mail, social media, or otherwise. You are expected to take into consideration the RIPE NCC's reputation and to protect it, and treat sensitive and classified information with the utmost care and confidentiality. Please review the [Internal Privacy Policy](#).

The RIPE NCC is also committed to respecting any individual's right to privacy of their personal data, including of course, that of its employees. The RIPE NCC complies with all applicable (inter)national laws of the processing of personal data, including the General Data Protection Regulation (GDPR). The RIPE NCC uses personal data only when

necessary, when authorised to do so, and for legitimate reasons, justified by the operational activities of the RIPE NCC. The RIPE NCC also takes measures to secure the personal data it processes from personal data breaches. We expect all our employees to comply with the measures. You can find more information in the [Acceptable Use Policy](#).

## 9. Representing the RIPE NCC Externally

The Code of Conduct is applicable for both work and work-related events and meetings. RIPE has a separate Code of Conduct in place that applies to all participants of its meetings and online interactions. All staff are expected to adhere to the [RIPE Code of Conduct](#) when they represent the RIPE NCC externally.

Many of us travel for work. This includes conferences, education courses, member lunches, RIPE Meetings, RIPE NCC Regional Meetings, being a member of a working group, etc. What you say as a representative of the RIPE NCC can have a lasting impact – for better or worse. Be mindful of what you say and who you are saying it to. This counts for verbal communication as well as via email and social media. When you respond or reply on a public mailing list or forum, be aware that readers of your comment see you as a RIPE NCC representative. A personal opinion can easily be seen as the opinion of the RIPE NCC. The community is well-connected and word travels fast. We expect each employee to always act and communicate in the best interest of the RIPE NCC’s mission and vision and in line with the RIPE NCC’s values.

Internal discussions and differences of opinion will be discussed internally and any differences displayed externally should be done so following internal coordination and always with the intention to bring good perspectives to the external world. To the outside world, staff members of the RIPE NCC have many voices bringing their own expertise and perspective, but these voices should not conflict in any way with overall RIPE NCC strategy or policy, and these voices should never be seen to argue unnecessarily in a public way. Discuss differences with your colleagues internally rather than externally. If people are unsure of what can be communicated externally, check with your People Lead.

### 9.1 Substance abuse at events

When you are invited to a work-related event where alcohol is served and you decide to drink, we expect you to do so in moderation. Please be aware that you are an ambassador of the RIPE NCC and event attendees see you as a representative of our company. How you behave will be watched closely.

We also encourage other RIPE NCC employees to approach and advise them that they are acting inappropriately when such behaviour happens at events.



## 10. Drug and Alcohol Use

The RIPE NCC is dedicated to maintaining a productive and safe environment for our employees. Employees who are under the influence of recreational and/or illegal drugs or alcohol may have decreased performance and they present a potential hazard to themselves and their co-workers.

Therefore, the RIPE NCC prohibits the following conduct:

1. The use, possession, sale, purchase or solicitation of recreational and/or illegal drugs or controlled substances on Company premises.
2. Being present at work – whether on or off Company premises – under the influence of alcohol, recreational and/or illegal drugs, or controlled substances that impair work performance or an Employee’s judgment.
3. Unauthorised use of alcohol on Company premises.

Using prescription drugs, prescribed by a doctor, is out of the scope of the Code of Conduct. Nevertheless, when the prescribed drugs can have a negative impact on the performance or an Employee’s judgement, it is recommended to address this with the manager or People Partners to avoid misconceptions related to this section of the Code of Conduct.

## 11. Relationships in the Office

Having people working side-by-side for a long time can sometimes lead to personal relationships. We expect at all times professional behaviour in the workplace regardless of personal relationships, where you take into account what impact your behaviour can have on others.

### 11.1 Romantic relationships

We are a mature organisation. We do not encourage romantic relationships within the organisation, but at the same time we accept that they can occur and therefore they are not forbidden. The general rule is that a personal relationship between two colleagues cannot and should not in any way affect the professionalism and performance of each individual. Both parties should always act in the best interest of the RIPE NCC.

More specifically, the following rules are applicable when a romantic relationship does occur:

- Romantic relationships in the same department and/or same reporting line must be disclosed to People Partners as they create a conflict of interest. This also counts for romantic relationships between employees from different departments, where there’s a potential conflict of interest. People Partners will



review the situation. If a romantic relationship does create an actual or apparent conflict of interest, it may require changes to work arrangements, for instance one person switching departments. If this is not possible, if there is a conflict of interest, a possible request could be that one of the two employees will be asked to leave the organisation.

- When the relationship leads to an integrity breach or a significant conflict of interest, for instance, covering up mistakes or colluding on important decisions for the benefit of the individual instead of the organisation, it could lead to disciplinary actions like an official warning, or even the termination of employment of either or both individuals involved. People Partners will investigate when events like this occur and will decide which (disciplinary) actions are applicable.

## 11.2 Cliques and exclusionary groups

We encourage the establishment of close friendships with colleagues - this is especially important for people who move from abroad to work at the RIPE NCC.

However, be mindful that close friendships in the office can quickly become cliques and alienate your colleagues. If you are part of a tight-knit group of friends, then do not actively exclude people or use language in the group that comments negatively on colleagues not part of that group. This is not in line with the values we have at the RIPE NCC, it can cause friction among colleagues, and it can damage relationships that are crucial for operations and for a safe and productive work environment.

## 12. Supervision, Reporting and Investigation

Compliance with this Code of Conduct and the RIPE NCC's other internal policies is a key requirement for the RIPE NCC's success as an organisation and its employees well-being.

The RIPE NCC Leadership takes responsibility for ensuring that all employees are familiar with this Code of Conduct and its contents. However, it is up to each employee to ensure compliance with this Code of Conduct in the day-to-day activities of the RIPE NCC.

If you see something, say something. You can report (potential) violations of the Code of Conduct or other RIPE NCC internal policies to your manager, lead link, senior manager, People Partners or the OR. All reports will be dealt with in confidence. Follow-up measures to assess the situation will be taken. If necessary, an (internal) investigation into the incident, with the potential assistance of outside counsel, will take place. Based on the seriousness of the incident, appropriate action will be taken by the appropriate decision makers.

## 12.1 External Trusted Contact

If you feel more comfortable reporting a (potential) violation to an external party, you can approach the RIPE NCC's Trusted Third-Party in strict confidence. All reports to them will be held in strict confidence. A report to the RIPE NCC (to People Partners) will only take place in agreement with you. The Trusted Third-Party and you will go through options on how to proceed from there and decide the next steps.

## 12.2 Internal Complaint Procedure

As an employer and as the Works Council of the RIPE NCC, we value a safe working environment in which all our employees are treated with respect. We consider undesirable behaviour in the working situation unacceptable. This includes the topic of sexual harassment, aggression and violence, bullying and discrimination, as described in this complaint procedure and as referred to in the RIPE NCC Code of Conduct.

RIPE NCC is obliged under the Dutch Working Conditions Act (Article 3 paragraph 2) to pursue a policy aimed at preventing and/or limiting unacceptable behaviour and psychological workload. This Internal Complaint Procedure forms part of this policy and is aimed at providing an individual employee of the RIPE NCC with the means to address unacceptable behaviour that they may be confronted with in their work. These regulations are also intended to prevent arbitrariness and/or careless treatment in this area within the organisation.

Complaints falling under the Internal Complaint Procedure can be sent to the Complaints Committee.

## 12.3 Whistleblower Policy

We want to create a safe and ethical environment for all people who work with and for us. Nevertheless, irregularities can occur.

Is something bothering you? Do you have a question in respect of ethics, integrity or compliance? Or would you like to report a violation of our code of conduct, internal procedures or applicable law? Or do you suspect this may be or become the case? Please let us know!

Asking questions and submitting reports is an essential part of our code of conduct and helps us to uphold our values and achieve our mission. We therefore encourage everyone to use the available procedures to speak up. All our internal and external staff can do this.

The Whistleblower Speak Up Policy encourages individuals concerned to come forward with credible information on illegal practices or violations of adopted policies and rules of the organisation. The policy specifies that the organisation will protect the reporting

individual from retaliation and identifies how and to whom such information can be reported.

Always feel free to discuss things with your People Lead.

Are you not comfortable discussing it with your People Lead? Or do you disagree with the outcome of the conversation? You can also discuss it with our HR Department. When it involves our Managing Director you can approach the Chair of the Executive Board. When you prefer to talk to someone external, you can reach out to our External Integrity Advisors for Integrity Violations or our External Trusted Counsellors for Undesired behaviour.

You can also submit your question or report through [our SpeakUp portal](#). This would be the preferred route if you suspect that it concerns wrongdoing that affects the public interest.

Through the portal, you can also submit a report. This can be done both anonymously or identifiable, in writing or by leaving a voice message. The procedure via [the SpeakUp portal](#) is handled through The Integrity Coordinator, an external, independent coordinator of Whistleblower SpeakUp procedures.

Furthermore, you can indicate there that you would like to have a personal conversation. In that case, The Integrity Coordinator will contact you. They will confirm the receipt of your report within seven days and keep you updated on the state of affairs.

You can also request advice or support from one of our Trusted counsellors.

They can also file a report on your behalf. If you wish, you can remain anonymous when doing so.

We want to be a good and safe place to work. If you are confronted with unwanted behaviour, you can file a complaint to the complaints committee according to our internal complaints procedure or you can report this via the [SpeakUp portal](#).

The RIPE NCC takes all reports seriously and will ensure that the Integrity Coordinator will investigate them fairly, independently and in a confidential way, in accordance with our investigation procedure, see Investigation Protocol.

When you file a report, it could be that clarifying questions are needed. We ask you to leave a contact email in the SpeakUp portal or for you to log into the portal frequently to check if there are questions for you.

The RIPE NCC will not retaliate against any person or organisation that has submitted a question or report based upon reasonable grounds. If you feel that you have faced retaliation as a result of your report, please also report this via the [SpeakUp portal](#).

In addition, you can also contact [the House for Whistleblowers](#) for advice or to report wrongdoing that affects the public interest or any disadvantage as a result of submitting a whistleblowing report. You can find the full SpeakUp procedure, also known as whistleblower procedure, here [Whistleblower SpeakUp Policy](#).

### **13. Disciplinary sanctions**

The RIPE NCC does not tolerate illegal or unethical conduct by its employees or consultants.

Employees who fail to comply with this Code of Conduct or other RIPE NCC internal policies may be subject to appropriate disciplinary action, e.g., from a verbal warning, to a notification in your personnel file, a written official warning, to contract termination and instant dismissal. In certain circumstances, should there be an investigation or prosecution by (inter)national authorities, personal criminal liability may be engaged.

Please visit [Disciplinary Measures and Consequence Management](#) for further explanation.