



## **Code of conduct and complaints procedure**

### **as amended by the BoD of EuroISME on 18 February 2026**

#### **Preamble**

The main purpose of Euro-ISME is to promote research, training and dialogue concerning military ethics. This includes analyses of various ethical traditions as well as the relation between military ethics and related subjects, such as international humanitarian law, human rights, etc. Aware of the potentially emotive nature of the issues involved, Euro-ISME strives to promote a continuous, proficient dialogue and to provide a community of discourse for those who are professionally engaged in the fields mentioned. Military officers, scholars and politicians are welcome to join the dialogue, based on a free, rigorous and honest enquiry of the issues involved, and with mutual respect for different points of view. Likewise, analyses and discussions of military ethics will respect the dignity of the professionals whose behaviour is being studied. The aim is to promote respect for military ethics, humanitarian law, human rights as well as a mutual understanding between the participants, and to promote a proper position of the military in a democratic society. The provisions below aim to safeguard the atmosphere of safety and collegiality in which such a dialogue can flourish.

#### **Art. 1 Material scope of application**

**Art. 1.1 Specification of the material scope of application.** The code of conduct and complaint procedure applies to all cases of sexual harassment, obscenities, insulting behaviour, discrimination, bullying, intimidation, plagiarism, copyright infringement, dishonourable conduct, illicit recording, corruption, financial impropriety, dereliction of duty or a violation of Euro-ISME's Internal Rules and/or its Statutes, if:

- a) the alleged act has taken place during a conference, meeting, workshop, etc., which has taken place under the auspices of Euro-ISME or during the organisation thereof;
- b) the alleged act has taken place in a published form such as an article, monograph, book, etc, which is published under the auspices of Euro-ISME or during the preparation thereof;
- c) the alleged act has taken place by a representative of Euro-ISME, elected or appointed, during the exercise of his/her duties.

d) the alleged act is of such gravity that, even though it did not take place in the circumstances listed at a to c above, Euro-ISME's Managing Board feels it necessary to investigate the circumstances and consider what further action it might take.

**Art. 1.1.1 Guidelines of the Board of Directors.** In addition to paragraph 1.1, guidelines for conduct issued by the Board of Directors shall be respected as an integral part of the material scope of application. Such guidelines, which aim to promote the respectful dialogue mentioned in the Preamble, shall include, but are not limited to, Chatham House Rule.

**Art. 1.2 Regulations of the Manfred Rosenberger thesis prize.**

Complaints concerning a violation of the regulations of the Manfred Rosenberger thesis prize for the best thesis against the author of a submission or against his/her sponsoring institution, shall be dealt with by the jury of the said prize. In conformity with the said regulations, the jury may decide on a sanction specified therein, including disqualification.

**Art. 1.3 Criminality** [deleted]

**Art. 2 Personal scope of application.**

The code of conduct of Euro-ISME applies to transgressions of individuals as well as institutions, regardless of the question whether they are members of Euro-ISME or not.

**Art. 3 Temporal scope of application.**

Any complaint concerning an alleged violation of Euro-ISME's code of conduct shall be made within six months of the alleged act. Complaints received after that date shall be declared inadmissible.

**Art. 4 Definitions.**

**4.1. Complaint.** A complaint is a written or oral statement alleging a violation of article 1.1 or Article 5 of the current code of conduct & complaint procedure. If possible the, complaint shall be supported by evidence, such as documents, photos, the name of the respondent, etc. Anonymous complaints shall be declared inadmissible.

**4.2 Complainant.** A complainant is an individual or institution, or duly authorised representative thereof, who files a complaint. A complainant may be either a victim or the alleged violator, a witness thereof, or both.

**4.3 Respondent.** A respondent is a person or institution against whom a complaint has been filed under Euro-ISME's code of conduct.

**4.4 Violation.** A violation of Article 1.1 or Article 5 of the current code, regardless of the question whether the violation is alleged, or has been determined to be well-founded by a competent authority under the current code.

**4.5 Complaint commission.** A complaint commission is the authority designated by Euro-ISME's Managing Board to investigate complaints under the current code.

The complaint commission consists, as a whole, of four members. The complaint commission will decide, in the case of written complaints, which three members thereof shall be seized of a particular complaint. In the case of oral complaints, a sole member of the complaint commission may be seized of the complaint. If the complaint commission consists of a sole person, he/she may advise the complainant to make the complaint in writing if the gravity of the violation or its complexity merits an assessment of the complaint by the full complaint commission.

**4.5.1 Members.** Members of the complaints commission must be full members of Euro-ISME. If a member of the complaint commission is materially involved in a complaint, he/she cannot be seized of the complaint concerned.

**4.6 Complaint procedure.** A complaint procedure is an internal procedure used by EuroISME to resolve complaints made to the complaint commission.

**4.7 Appeal.** The decision of the Complaint commission is final, except in cases where the respondent is a BoD member or where the sanction issued is a suspension from elected office, or a loss of membership of Euro-ISME as mentioned in article 9.1 paragraphs b) and e) respectively, or, alternatively, in cases in which a sole member of the Complaint commission, in first instance, was seized by the complaint concerned.

## **Art. 5 Confidentiality and non-retaliation.**

Complaints shall be handled in a confidential manner with a respect to the privacy of all parties, to the fullest extent possible, notwithstanding Article 9.1 paragraphs b and e, and Article 10.3. The complaint commission or the appeals commission will make every effort to limit the distribution of pertinent information to those persons with a need to know, within the constraints of the investigative process by.

**5.1 Non-retaliation.** Euro-ISME positively prohibits any retaliation in any form for filing a complaint. The confidentiality and non-retaliation requirements extend to all parties involved, including the complainant and the respondent. A violation of this provision shall be regarded as a violation of the current code of conduct and will be subject to corrective action.

## **Art. 6 How to make a complaint**

**6.1. Oral complaints.** Oral complaints may be presented to a member of the Complaint commission or to any member of the Managing Board by the complainant. If the complaint is presented to a member of the Managing Board, that member shall immediately assist the complainant in seeking contact with a member of the complaint commission. If the violation took place at a the conference, meeting, work shop, etc, where no member of the complaint commission is present, a member of the Managing Board who is present at the said conference, meeting or work shop shall immediately provide the complainant with the contact details of the complaint commission.

**6.1.1 Telephone, teleconference.** Complaints made to a member of the complaint commission or a member of the Managing Board by telephone or teleconference shall be considered to be oral complaints. Oral complaints shall be confirmed in writing by the member of the complaints commission to the complainant within ten working days.

**6.2 Written complaints.** Written complaints shall be sent to the Complaint commission. The complaint commission shall confirm receipt of the complaint to the complainant within ten working days. The Complaint commission shall inform the respondent accordingly.

#### **Art. 7 Procedure for oral complaints**

**7.1 Oral complaints.** In conformity with Article 4.5 and Article 7.4, oral complaints can be dealt with by a sole member of the complaints commission; preferably the sole member who is present – or has been present – at the conference, meeting, work shop, etc., where the alleged violation took place. The sole member will confidentially inform the other members of the complaint commission of the existence of the complaint within ten calendar days.

**7.2 Information supporting the complaint.** Upon receiving an oral complaint, the sole member of the complaint commission may request the complainant to render additional information relevant to the assessment of the complaint, such as documents, the name of the respondent, the names of witnesses, the time, circumstances and location of the alleged violation, etc. A refusal by the complainant to render such information may render the complaint inadmissible.

**7.3 Procedural information offered by the member of the complaint commission.** Upon receiving an oral complaint, the sole member of the complaint commission shall inform the complainant of the options available to the complainant to pursue the complaint. Unless the alleged violation involves, if substantiated, a violation of the criminal code, no steps shall be taken by the sole member of the complaint commission to approach the respondent without the express consent of the complainant; neither shall the sole member approach witnesses unless this is expressly agreed upon by the complainant. At the request of the complainant, the name of the complainant shall, if practically possible, be withheld from the defendant.

**7.4 Initial authority of the sole member of the complaint commission.** Following the receipt of a complaint, the sole member of the complaint commission shall assess whether the complaint is admissible in view of the articles 1 through 3 of the current code. In the case the complaint is admissible, the sole member of the complaint commission may:

- a) offer to mediate between the complainant and the respondent;
- b) offer to approach the respondent privately to discuss the complaint;
- c) advise the complainant to make the complaint in writing to the full complaint commission;
- d) advise the complainant not to pursue the complaint if the complaint is considered not to meet the criteria in Art 1 to 3.

**7.4.1 Inadmissibility.** If the complaint is inadmissible or will not be taken further, the sole member will inform the complainant at his early convenience. A complaint may be declared inadmissible by the sole member if, for example, the alleged violation is so slight that the invocation of the complaint procedure is unwarranted. The defendant may appeal against the decision of the sole member.

#### **7.5 Further authority of the sole member of the complaint commission.**

**7.5.1 Mediation.** Provided the complainant agrees, the sole member of the complaint commission shall initiate mediation between the complainant and the respondent. Such mediation may take

place with separate meetings with, respectively, the complainant and the defendant, or with the complainant and the respondent jointly. In view of the geographical distances with which Euro-ISME has to cope, mediation may have to take place by telephone, teleconference or other electronic means. The purpose of mediation is to establish the facts and to arrive at a friendly and mutually agreeable settlement of the complaint. This may include a mutual explanation of each other's points of view, or an apology orally or in writing, from the defendant to the claimant. If the mediation effort is unsatisfactory, either the complainant or the sole member of the complaint commission may decide to present the complaint in writing to the full complaint commission. No appeal against the decision to refer the case to the full complaint commission is possible.

**7.5.2 Private discussion with the respondent.** Provided the complainant agrees, the sole member of the complaint commission will approach the defendant privately and discuss the complaint made. The defendant will have the opportunity to present his/her views of the case. The respondent may request mediation by the sole member of the complaint commission in order to resolve the case amicably. The sole member may also hear witnesses, if any. The sole member shall inform the respondent of the possibility that the complaint may also become a written complaint, which will subsequently be considered by the full complaint commission.

**7.5.3 Formal advice.** If the complaint is considered by the sole member to be founded, the sole member may advise the defendant formally to refrain from similar conduct in the future. Such an advice shall be either orally or in writing; if it is in writing it shall be catalogued and the other members of the complaint commission, the complainant, as well as members of the Managing Board shall be informed. A written record of any oral advice offered must be made and retained by the complaint commission. An appeal against written formal advice is possible; such an appeal must be made in writing and within thirty days counting from the day the formal advice was given. The appeal shall be launched to the complaint commission. In such an appeals case, three members of the complaint commission shall be seized of the matter. The sole member who issued the written advice shall not be seized of the appeal, although his views shall be heard during the appeals procedure.

**7.5.4 Referral.** The sole member, having assessed the nature of the complaint, may, in view of the severity or complexity of its nature, advise the complainant to refer the complaint to the full complaint commission. The sole member may also decide not to offer formal advice, and, in view of the severity or complexity of the case, decide on his/her own authority to refer the case to the full complaint commission. Both the complainant as well as the respondent shall be informed by the sole member as soon as possible of any referral.

**7.5.5 Time-line and conclusion of oral complaints.** The sole member of the complaint commission shall make every effort to ensure that within twenty calendar days following the initial receipt of the complaint, that the complaint shall, alternatively:

- a) be resolved satisfactorily by mediation, resulting in a written determination to that effect;
- b) be referred to the full complaint commission;
- c) result in an assessment whether the complaint is founded or unfounded. This assessment may be oral or in writing. If the complaint had been determined to be founded, the assessment may include formal advice to the respondent to refrain from similar conduct in the future. If this formal advice is in writing, it shall be sent immediately to the respondent and the complainant informed that such advice has been issued. Appeal against this written finding is possible within thirty calendar days of the date of the finding.

## **Art. 8 Procedure for written complaints.**

All written complaints, including appeals, shall be addressed to the complaints commission. The complainant shall receive a confirmation of receipt within ten calendar days and the complaint commission shall inform the respondent accordingly.

**8.1 Information supporting the complaint.** Upon receiving a written complaint, the full complaint commission may request the complainant to render additional information relevant to the assessment of the complaint, such as documents, the name of the respondent, the names of witnesses if any, the time, circumstances and location of the alleged violation, etc. A refusal by the complainant to render such information may render the complaint inadmissible.

**8.2 Initial authority of the complaint commission.** Following the receipt of a complaint, the complaint commission shall assess whether the complaint is admissible in view of the articles 1 through 3 of the current code. In the case the complaint is admissible, the complaint commission may:

- a) offer to mediate between the complainant and the respondent;
- b) investigate the complaint;
- c) decide not to entertain the complaint if the severity of the complaint is, for instance, insufficient to merit the use of the complaint procedure.

**8.3.1 Mediation – nature and purpose.** Provided the complainant agrees, the complaint commission shall mediate between the complainant and the respondent. Such mediation may take place with separate meetings with, respectively, the complainant and the respondent, or with the complainant and the respondent jointly. In view of the geographical distances with which EuroISME has to cope, mediation may have to take place by telephone, teleconference or other electronic means. The purpose of mediation is to establish the facts and to arrive at a friendly and mutually agreeable settlement of the complaint. This may include an apology orally or in writing, from the respondent to the claimant. If the mediation effort is unsatisfactory in the view of the complaint commission, or if the respondent refuses to cooperate, the complaint commission may terminate the mediation unilaterally and proceed with an investigation which will result in a formal determination and the possibility of corrective action.

**8.3.2. Time-line.** Every effort should be made by all parties involved to conclude the mediation within sixty calendar days, counting from the initial receipt of the written complaint. Perceived deliberate stalling of the mediation effort by either the complainant or the respondent may lead either to inadmissibility of the case or to a full investigation, as to be decided by the complaint commission. If the mediation is satisfactory, the complaint commission will issue a determination to that effect and forward this determination to both the complainant and the defendant.

## **8.4 Material authority of the complaint commission - investigation**

**8.4.1 Investigation - cause.** The complaint commission may decide to launch an investigation if:

- a) it makes a determination under Article 9.3.1 that mediation proves unsatisfactory; or
- b) if the severity or complexity of the complaint merits a full investigation; or
- c) if the complainant requests an investigation; or

d) if the sole member of the complaint commission mentioned in Article 4.5 refers the case under Article 7.5.1 or Article 7.5.4 to the full complaint commission.

All contacts taking place in the context of an investigation by the complaint commission and the parties involved shall be in writing or, if they are oral, shall be minuted.

**8.4.2 Notification.** If a decision is taken to launch an investigation, the complainant and the respondent shall be informed within seven calendar days by the complaint commission of this decision. The complainant shall be asked to present all evidence available within thirty days of the day the complainant being informed that an investigation has been launched. A refusal by the complainant to submit all available evidence may lead to inadmissibility of the case. Upon receipt of the evidence by the complaint commission, it shall be forwarded to the respondent, who shall be requested to offer his/her views and further evidence, again within a period of thirty days. The views of the respondent and his/her evidence shall be forwarded to the complainant, who will have thirty days to react. The reaction of the complainant shall be forwarded by the complaint commission to the respondent, who will have thirty days to offer his/her reaction.

**8.4.3 Oral hearings.** Given the geographical distances with which Euro-ISME has to cope, oral hearings will only be conducted by the complaint commission in exceptional cases. However, it may, at its discretion consider holding a teleconference to that effect.

**8.4.4 Purpose.** The purpose of an investigation is to establish formally whether a violation of Article 1 or Article 5 has taken place and whether the respondent is at fault.

**8.4.5 Third parties, witnesses.** The complaint commission may request additional information from third parties, including witnesses, if the needs of the investigation so demand.

**8.4.6 Time-line.** The complaint commission shall make its determination known within 180 days of the initial receipt of the complaint. In exceptional cases, it may decide to extend this period by sixty days, if this decision has been taken within the initial period of 180 days. Both the complainant and the respondent shall be informed accordingly.

**8.4.7 Determination.** A written and confidential report which formally determines whether a violation of the current code has taken place, and whether the respondent is at fault, shall be issued to the complainant and the defendant. This report must specify the allegations, the defence made against them, the method of investigation, policy considerations, and corrective actions, if any. A copy of this report will be issued to the Managing Board confidentially.

## **Art. 9 Corrective actions.**

**Art. 9.1 Availability of corrective actions.** Following a determination under Article 8.4.7 that a violation has taken place and that the respondent is at fault, the complaint commission may decide, depending on the severity and complexity of the case, whether further actions are necessary. Depending on the merits of the case, the following corrective actions may, be issued:

**a) A letter of reprimand.** A letter of reprimand, signed by the chairperson of the complaint commission may be issued to the defendant. The claimant will be informed of the fact that the letter of reprimand has been sent, and the members of the Managing Board will also be informed. If third-parties have seen their rights or honour violated, they too shall be informed that a letter of reprimand has been sent to the defendant.

**b) Suspension from activities of Euro-ISME.** The respondent may be suspended from all activities of Euro-ISME for a maximum of two years. If the defendant is an elected member of the Board of Directors, then he/she may be suspended from activities of Euro-ISME for the period until the next General Assembly of Members convenes. At this next Assembly, his/her suspension shall be an item on the agenda. After a full discussion of the case, where the complaint commission may present its determination and the respondent may present his/her case, the General Assembly of Members may decide to confirm the suspension or to reinstate the suspended member of the Board of Directors, or to select another corrective measure, in a secret ballot.

**c) Dismissal from appointed positions.** If the defendant holds a position into which he/she has been appointed by Euro-ISME's Board of Directors, he/she may be dismissed from that position by the complaint commission.

**d) Loss of membership.** A member may see his membership of Euro-ISME discontinued. If a respondent has received three formal letters or reprimands under Article 9.1a and/or formal advices not to engage in similar conduct under Art. 8.5.3 and Art. 8.6.4c, the defendant will also lose his/her membership.

**e) Suspension from elected positions.** If the defendant is an elected member of the Board of Directors, then h/she may be suspended from the Board of Directors for the period until the next General Assembly of Members convenes. At this next Assembly, his/her dismissal shall be an item on the agenda. After a full discussion of the case, where the complaint commission may present its determination and the defendant may present his/her case, the General Assembly of Members may decide to confirm the suspension or to reinstate the defendant or to select another corrective measure, in a secret ballot.

**f) Damages.** The complaint commission may advise Euro-ISME's Board of Directors to sue for damages, if Euro-ISME has suffered from embezzlement, corruption or other misappropriation of its funds.

**g) Report of crime.** The complaint commission, or respectively, the sole member, may, in view of the severity of the case, determine that it is likely that a violation of criminal law has been conducted. In that case, the complaint commission shall advise to inform both the police as well as the members of the Managing Board forthwith.

**Art. 9.2 Record.** The complaint commission shall keep a record of all determinations made under the Articles 7 and 8, as well as of the issuance of corrective actions, if any, under Article 9.1. Such records shall be kept for a period of five years.

## **Art. 9A. Finality of decisions**

**9.1 Basic principle of finality.** The decision of the complaints commission is final, except when:

- a) The decision was taken by the sole person mentioned in Articles 7.4.1 and 7.5.3.
- b) The respondent has been elected into office by the AGM.

## **Art. 10 Appeals**

**Art. 10.1** [deleted]

**Art. 10.2** [deleted]

**Art. 10.3 Role of the General Assembly of Members.** The General Assembly of Members is authorised to hear appeals cases if:

- a) the appeal is against a the decision whether or not to suspend a person with an elected position as listed in Article 9e; or
- b) the appeal is against a the decision whether or not to suspend a person with elected position from activities as mentioned in Article 9b.

**Art. 10.4 Deadline for appeals.** Appeals shall be launched within thirty calendar days of the determination of the complaint commission. It shall be in writing and addressed to the Executive Director(s) of Euro-ISME, or to its President. Appeals launched after thirty days shall be considered inadmissible.

**Art. 10.5 Time-line of the appeals procedure.** The Executive Director(s) shall confirm receipt of an appeal mentioned in Article 10.3 within ten working days to the author(s) of the appeal. The Executive Director(s) shall add the appeal to the agenda of the forthcoming AGM, provided the appeal is received no later than seven calendar days before the AGM.

**Art. 10.5.1 Procedure at the AGM.** During the appeals procedure at the AGM, the appellant, the appealed and a representative of the complaints commission shall be heard. The procedure shall be presided over by the President or the vice-President, who may fix time-limits on the respective oral presentations. After the oral presentations have been heard the decision on appeal shall be taken by the members present at the AGM by a secret vote.

**Art. 10.6 Finality.** The decision reached following the appeals procedure is final.

## **Art. 11 Appointment.**

**Art. 11.1 Role of the Managing Board.** The Managing Board shall appoint six members for the complaint commission. The appointments shall be made for a period of three years, which is renewable twice.

**11.2 Election of the chair of the complaint commission.** The members of the complaint commission shall elect from their midst a chairperson.

**11.3 Members seized of a complaint or appeal.** The complaint commission shall, in the case it receives a complaint, decide which three members from its midst shall be seized of the complaint or appeal.

## **Art. 11A Issues requiring immediate action.**

**11A.1 Authority of the Managing Board.** If a serious incident arises which requires immediate action aimed at respecting the current code of conduct, the guidelines issued by the BoD, or at restoring the peace, then a member of the Managing Board may, if possible after issuing a verbal warning, order the person(s) creating the disorder to temporarily leave the room, or, alternatively, to leave the conference, workshop or meeting entirely. The order to leave the conference, workshop or meeting entirely shall be confirmed by the Managing Board in writing to the person(s) creating the disorder within ten working days. The confirmation shall state the reasons for the order given. If an order to leave the conference, workshop or meeting entirely is given, then Euro-

ISME will not refund, either in whole or in part, any fees paid for attending the said gathering to the person(s) creating the disorder.

**11A.2 Appeal against an order to restore the peace.** Only against an order to leave the conference, workshop or meeting entirely can an appeal be launched. The appeal can only be launched by the person who was ordered to do leave the conference. The appeal shall be addressed to the complaint commission within calendar thirty days, counting from the day the verbal order was given.

**11A.3 Notification.** The member of the Managing Board who exercises his authority mentioned in Article 11A.1 shall notify the other members of the Managing Board as soon as possible.

#### **Art. 12 Publication.**

The current code of conduct & complaint procedure shall, after its adoption, be published on Euro-ISME's website as soon as possible by the Board of Directors. The names of the members of the complaint commission, plus their contact details, shall also be published on Euro-ISME's website.

#### **Art 13 Annual report.**

The complaint commission shall file an annual report, in writing, Euro-ISME's Board of Directors, no later than one month before the next General Assembly of Members. The report shall be presented to the AGM. In an anonymous format, the annual report will list the number and types of complaints it has received, and how they have been dealt with. If necessary, the complaint commission may propose improvements to the current code.