Anti-Corruption Code of Conduct

1. **Be an example.** Show others that corruption will not be tolerated.

2. **If you are offered gifts or benefits,** check whether you need authorization before accepting. You can check which gifts you are allowed to accept without authorization in the Universität Hamburg Guidelines on the Acceptance of Benefits, Rewards, and Gifts. If you are unsure or need authorization to accept a gift or benefit, contact the Anti-Corruption Unit.

3. **You must reject all attempted corrupt activities immediately and inform your supervisor and/or the Anti-Corruption Unit without delay.** Make sure to create clear boundaries with external contacts or during internal control duties, and reject all corrupt activities immediately. There must never be any suspicion or presumption that you are open to “small gifts.” Do not be afraid to reject a gift or a benefit while making the individual(s) aware of the rules that apply to you. If you work in an administrative area that deals with public contracts, you must be particularly careful, since this is where most corrupt activities occur.

   The Anti-Corruption Unit can provide you with information in strict confidentiality or anonymously if you prefer. **Contact** Erik Schank (head), telephone +49 40 42838-7198, or Peter Siebeneichner, telephone +49 40 42838-5960.

   You can also obtain advice, anonymously if you prefer, from the office of internal investigation (Dezernat Interne Ermittlungen) of the Hamburg police force at telephone0800 3437238.

4. **If you suspect someone will ask you for improper preferential treatment, take a colleague with you as a witness.** Sometimes you will be faced with a situation where you suspect a dubious request is being made that you are unable to easily reject. Often, clearly distancing yourself does not help. In these cases, it can be very helpful to ask a colleague to participate in the meeting with you.

5. **Work in such a way that your work can be checked.** Try to deal with your tasks in a way that is transparent and understandable to an external observer. It also helps to familiarize your colleagues with your duties (e.g., so they can assume responsibilities in case of illness or vacation). Transparent filing and archiving in compliance with legal requirements will protect you from stated or tacit accusations of impropriety in the case of an audit or check.

6. **Keep your work and private life strictly separate.** Check whether your private interests, including those of your family members, could lead to a conflict of interest with your work duties. Please see the circular on conflicts of interest. Make it clear with your private contacts from the beginning that you must remain beyond reproach and strictly separate your work and private life. You must check whether your or your family’s private interests or those of organizations with which you or they are associated could lead to any conflict of interest with your allocated or chosen duties. If you detect a potential conflict of interest between your duties and private interests in a specific activity, you must inform your supervisor with sufficient time so that they can react appropriately, for example, relieving you of specific tasks in individual cases.
7. **Support your team in uncovering and investigating corruption.** Inform your supervisor of any signs of corrupt behavior. Corruption can only be prevented and combated if all staff pursue this as a goal, both internally and in dealings with third parties. Corruption on behalf of colleagues should not be covered up out of any false sense of solidarity, nor should spurious accusations be made. If you have demonstrable evidence of corruption among your colleagues, do not hesitate to talk to your supervisor or to the Anti-Corruption Unit.

8. **Help your team recognize inappropriate organizational structures that facilitate attempted corrupt activities.** Team leaders should implement transparent processes so as to prevent the initiation of corruption. Often, processes have formed over time that have resulted in specializations or the potential for all responsibility to be vested in a single person. These processes may be particularly open to corrupt practices. Changing the organizational structure can often help. However, this requires that staff provide appropriate information that will allow for clear and transparent processes to be developed.

9. **Seek training and professional development on the subject of corruption.** Find out about the forms of corruption, preventative measures, risk situations, and civil service and labor law consequences. This will help you better prevent and combat corruption yourself. Specialized training will give you more certainty on dealing with corruption appropriately and in accordance with the law.

10. **What to do if you are already complicit?** The constant fear of discovery is a burden you do not have to carry. Clear things up, and report your concerns yourself. If your information helps to completely clear up a matter of corruption, this may be considered as a mitigating factor in your favor when determining penalties under criminal or civil service law.

Hamburg, 30 October 2020

Univ.-Prof. Dr. Dr. h.c. Dieter Lenzen
President

Dr. Martin Hecht
Head of Administration

Source: Based on the federal guideline on preventing corruption in federal administration (Richtlinie der Bundesregierung zur Korruptionsprävention in der Bundesverwaltung) dated 30 July 2004.