



Code of Conduct for the EASA Board of Appeal	Doc #	PO.IMS.00016-004
	Approval Date	15/10/2020

Code of Conduct for the
EASA Board of Appeal

PO.IMS.00016-004

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DOCUMENT CONTROL SHEET

Abbreviations

ADoI: Annual Declaration of Interest
 BoA: Board of Appeal
 Col: Conflict of Interest
 DoI: Declaration of Interest
 EASA: European Aviation Safety Agency
 EU: European Union
 OECD: Organisation for Economic Co-operation and Development
 ODoI: Oral Declaration of Interests

Log of issues

Issue	Issue date	Change description
001	31/07/2012	This Policy was designed by a task force composed of representatives from Policy Officers, Legal Department (including data protection officer) and led by Internal Audit & Quality. It takes into account the draft specific report "Management of conflict of interest in selected EU Agencies (ECHA, EFSA, EMA, EASA)" released by the Court of Auditors mid-June 2012.
002	30/01/2013	Updated policy (changes highlighted in yellow): Opinion of Ethical Committee should be requested by the Executive Director only (alignment with Ethical Committee procedure) and the request for review is on the first assessment.
003	01/09/2014	Migration of Quality documents in compliance with Convergence project
004	15/10/2020	This Policy has been revised to include an Anti-fraud statement at the end of the document. It does not meet the expected quality standards and a full review of the document is required in due time.





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1 Background

According to Article 40(2) of Regulation (EC) No 216/2008¹, hereinafter referred to as “the Basic Regulation”, the Board of Appeal, hereinafter called the “Board”, shall be responsible for deciding on appeals against the decisions of the Agency referred to in Article 44 of the Basic Regulation.

Following Articles 42 and 43 of the Basic Regulation, the members or alternate members of the Board, hereafter referred to as “Board Members” or “Board Member”, shall be independent and shall not be bound by any instructions in making their decisions. Moreover, the Board Members may not perform any other duties within the Agency and may not take part in any appeal proceedings if they have any personal interest therein.

The “Code of Conduct for the EASA Board of Appeal” provides the general principles to be followed and the measures to be adopted in order to ensure compliance with the aforementioned obligations under the Basic Regulation.

2 Code of Conduct for the EASA Board of Appeal

Article 1 - General provision

1. In their performance of their duties and in their relations with the public, Board Members shall respect the principles which are laid down in this “Code of Conduct for the EASA Board of Appeal”, hereafter referred to as “the Code”.
2. The “public” and “individuals” refer to both natural and legal persons, in particular external stakeholders, whether or not they reside or have their registered office in a Member State of the European Union.

Article 2 - Scope of application

1. This Code shall apply to all members of the Board who is performing its duty and responsibility as part of its relation with the public.
2. The Board shall take the necessary measures to ensure that other persons or bodies working for the Board comply with the provisions of the Code.

Article 3 - Lawfulness

The Board Member shall act according to law and apply the rules laid down in applicable law and procedures. The Board Member shall in particular ensure that decisions which affect the rights or interests of individuals have a basis in law and that their content complies with the law.

Article 4 - Absence of abuse of power

The Board Member shall exercise his or her powers solely for the purposes for which they have been conferred by the relevant provisions. The Board Member shall in particular avoid using those powers for purposes which have no basis in the law or which are not motivated by any public interest.

Article 5 - Absence of discrimination

1. In dealing with requests from the public and in taking decisions, the Board Member shall ensure that the principle of equality of treatment is respected. Members of the public who are in the same situation shall be treated in a similar manner.
2. If any difference in treatment is made, the Board Member shall ensure that it is justified by the objective relevant features of the particular case.

¹ Regulation (EC) No. 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No. 1592/2002 and Directive 2004/36/EC





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3. The Board Member shall in particular avoid any unjustified discrimination between members of the public based on nationality, sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age, or sexual orientation.

Article 6 - Proportionality

1. When taking decisions, the Board Member shall ensure that the measures taken are proportional to the aim pursued. The Board Member shall in particular avoid restricting the rights of individuals or imposing charges on them, when those restrictions or charges are not in a reasonable relation with the purpose of the action pursued.
2. When taking decisions, the Board Member shall respect the fair balance between the interests of individuals and the general public interest.

Article 7 - Impartiality and independence

1. The Board Member shall be impartial and independent. The Board Member shall abstain from any arbitrary action adversely affecting members of the public, as well as from any preferential treatment on any grounds whatsoever.
2. The Board Member shall not be guided by personal or national interest, or any outside influences of whatever kind, including political pressure or influences.
3. The Board Member shall abstain from handling matters which involve his or her own interest, or those of his or her family, relatives, friends and acquaintances.

Article 8 - Objectivity

When taking decisions, the Board Member shall take into consideration all relevant factors and give each of them its proper weight in the decision, whilst excluding any irrelevant element from consideration.

Article 9 - Legitimate expectations and consistency

1. The Board Member shall respect the legitimate and reasonable expectations that members of the public have in the light of how the Board has acted in the past.
2. The Board Member shall be consistent in his or her own administrative practice as well as with the administrative action of the Board. The Board Member shall follow the Board's normal administrative practices, unless there are legitimate grounds for departing from those practices in an individual case; these grounds shall be recorded in writing.

Article 10 - Fairness

The Board Member shall act impartially, fairly and reasonably.

Article 11 - Courtesy

1. The Board Member shall be service-minded, correct, courteous and accessible in relations with the public. When answering correspondence, telephone calls and e-mails the Board Member shall try to be as helpful as possible and shall reply as completely and accurately as possible to questions which are asked.
2. The Board Member shall, where appropriate, advise the public on how a matter which comes within his or her remit is to be pursued and how to proceed in dealing with the matter.

Article 12 - Acknowledgment of receipt

1. In general, and in due consideration of the specific rules applicable to the Board of Appeal. Every letter or complaint to the Board shall receive an acknowledgement of receipt within a period of two weeks, except if a substantive reply can be sent within that period. This also applies to e-mail, where the e-mail is, by its nature, the equivalent of a letter.
2. The reply or acknowledgement of receipt shall indicate the name, telephone number and e-mail address of the Board Member who is dealing with the matter.





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3. No acknowledgement of receipt and no reply need to be sent in cases where letters or complaints are abusive because of their excessive number or because of their repetitive or pointless character.

Article 13 - Obligation to transfer files to the Agency

1. If a letter or a complaint is addressed or transmitted to the Board, it shall ensure that the file is transferred without delay to the Agency, if the Agency is the competent service to deal with.
2. The Board shall notify the author of the letter or complaint of this transfer in the acknowledgement of receipt by indicating the contacts to whom the file has been passed.

Article 14 - Data protection

1. The Board Member who deals with personal data concerning an individual shall respect the privacy and the integrity of the individual in accordance with the provisions of [Regulation \(EC\) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data](#).²
2. The Board Member shall in particular avoid processing personal data for non-legitimate purposes or the transmission of such data to non authorised persons.

Article 15 – Request for information

The Board shall refer any request for information to the Executive Director of the Agency for further processing in accordance with the applicable Agency rules and procedures. The Board shall advise the individual requesting the information accordingly.

Article 16 - Requests for public access to documents

The Board shall refer any request for access to documents to the Executive Director of the Agency. The request shall be processed in accordance with the Agency’s Public Access to EASA Documents procedure, including related forms and in accordance with the general principles and limits laid down in [Regulation \(EC\) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents](#)³

The Board shall advise the individual requesting the information accordingly.

Article 17 - Keeping of adequate records

The Board shall ensure that Board records are properly processed in accordance with the principles lay down in the Agency policy for records management⁴.

Article 18 - Publicity for the Code

The Board undertakes to make the content of its Code known to its member and to the Public, via publication on the EASA web-site.

² OJ L 8, 12.01.2001, p. 1.

³ OJ L 145, 31.05.2001, p. 43.

⁴ PO.IMS.00018 Documents and Records management





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**Annex 1:
Policy on impartiality and independence:
prevention and mitigation of Conflict of Interest**

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1 Purpose and scope

The purpose of this policy is to establish the principles governing impartiality and independence of the Board Members and define the measures to ensure their practical application in order to prevent and mitigate the risk that past, current or future personal or national interests, or any outside influences of whatever kind, might improperly influence the impartiality and the independence of the Board Members during the performance of their duties. These principles and measures cover among others the management of:

- situations of potential Conflict of Interest (declaration, monitoring, training/information);
- situations of alleged or actual Conflict of Interest.

When deemed necessary to complete the existing applicable EU and EASA Regulations, the policy will refer to the OECD guidelines⁵.

2 Concept of Conflict of Interest

What is a Conflict of Interest (Col) for the European Commission⁶?

According to the European Commission, situations of Conflict of Interest can arise when:

- there is some link between staff members' work and their private interest, or those of their family or partner;
- staff members find themselves in a situation that could reasonably lead to allegations being made of bias or partiality, in the light of their personal interests.

OECD guidelines define the potential and actual Col as follows:

Actual Conflict of Interest: involves a conflict between the public duty and private interests of a public official, in which the public official has private-capacity interests which could improperly influence the performance of their duties and responsibilities.

Potential Conflict of Interest: occurs where a public official has private interest which are such that a Conflict of Interest would arise **if the official were to become involved in relevant (i.e conflicting) official responsibilities in the future.**

Conflict of Interest for EASA Board of Appeal:

For the purpose of this policy, the concept of Conflict of Interest refers to and follows the European Commission guidance with the necessary adaptation. Moreover, distinction will be made between potential and actual Col, as proposed in the OECD guidelines. Alleged situation of Conflict of Interest is considered in case of actual Conflict of Interest where evidence has not been established.

3 Principles and measures

According to Article 7 "Impartiality and Independence" of the Code, Board Members shall be and remain impartial and independent when acting in their official capacity as Board Members. In order to ensure compliance with this requirement, the Board applies the following principles and measures:

- Principle of Declaration of Interests;
- Gifts and hospitality;

⁵Managing Conflict of Interest in the Public Service: OECD Guidelines and Country Experiences (OECD, Paris, 2003).

⁶http://myintracomm.ec.testa.eu/hr_admin/en/ethics/obligations/conflicts_interest/Pages/conflicts_interest.aspx





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- Breach of this policy;
- Training and information.

4 Principle of declaration of interests

In order to prevent, detect, monitor, mitigate and deal with situations of potential and actual Conflict of Interest, the Board applies the principle of declaration of interests to be filled by each Board Member and assessed by the Agency.

It should be noted that having an interest does not necessarily mean having a Conflict of Interest.

4.1 Category of interests

For the purpose of this principle, the following categories of interests have been defined:

1. **Employment:** any form or regular occupation or business, part-time or full-time, paid or unpaid, including self-employment (e.g.: consultancy), in any legal or natural organisation or company carrying out any of the activities on which EASA's outputs impact directly or indirectly;
2. **Consultancy, legal representation, advice:** any activity in which the concerned person provides advice or services related to the field of the activities of EASA to organisations, companies, associations or other bodies. This includes also services provided on an honorary basis (i.e. for free or without the payment of fees or emoluments);
3. **Membership of a Management Board or equivalent structure:** any participation in the internal decision-making of a public or private entity with an interest in the field of the activities of EASA;
4. **Membership of an Advisory Board or equivalent structure:** any participation in the works of an advisory body, created permanent or created ad-hoc, managed by a body with an interest in the field of the activities of EASA, with a right to have an influence on its output(s). This includes also participation in activities carried out with EASA;
5. **Other membership or affiliations:** any membership or affiliation not falling under the categories above and relevant for the purposes of the present policy, to any body with an interest in the field of the activities of EASA, including professional organisations;
6. **Research funding:** any funding for research or developmental work related to a field of the activities of EASA received from any public or private body by the concerned person in his or her personal capacity or falling under the professional sphere of influence of that person. It includes grants, rents and reimbursement of expenses, sponsorships and fellowships;
7. **Intellectual property rights:** rights in the field of the activities of EASA granted to creators and owners of works that are the result of human intellectual creativity (e.g. patents, trademarks, etc) and may lead to a financial gain. Plain authorship and publications shall not be declared;
8. **Investments:** any economic stake or share in a body with an interest in the field of the activities of EASA, including the stocks, equities or bonds thereof, or of one of its subsidiaries or of a company in which it has a holding. Financial instruments on which the concerned person has no influence are not to be considered relevant;
9. **Public statement or position:** any expert opinion or testimony in the field of the activities of EASA for a commercial entity or other organisation as part of a regulatory or judicial process. Any office or other position (paid or unpaid), where the concerned person represented interests or defended opinion in the field of the activities of EASA,





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10. **Other relevant interest:** any interest not falling under the categories provided above and relevant for the purposes of the present policy.

4.2 Types of Declaration of Interests

All Board Members shall complete a “Public Annual Declaration of Interests and Declaration of Confidentiality for Management Board and Board of Appeal Members” on an annual basis. In addition, Board Members are required to perform an Oral Declaration of Interests at the beginning of a Board meeting when necessary.

The responsibility for a complete and truthful declaration shall lie exclusively with the Board Member declaring his or her interest.

4.2.1 Public Annual Declaration of Interests (PADoI)

All Board Members shall declare any interest belonging to the categories listed in paragraph 4.1 with respect to all activities in which they are involved or have been involved during the five years preceding the submission of the PADoI and all activities in which they are currently involved. This also applies to their close family⁷. The PADoI shall be submitted to the Executive Director’s Office with the Chair of the Management Board in copy.

The PADoI shall be filled by a Board Member before taking up function in the Board. Then, every year, the Board Member is requested to update his or her PADoI. Should there be any change to the information provided in the PADoI due to the fact that the Board Member acquires additional interests, he or she shall promptly notify the Executive Director’s Office of the Agency, the Chair of the Board and the Chair of the Management Board; and complete a new PADoI.

4.2.2 Oral Declaration of Interests (ODoI)

Oral Declaration of Interests is related to meetings.

When a Board Member participates to a Board meeting, he or she shall declare orally any interest that might be considered prejudicial to their impartiality and independence in relation to the items on the agenda. The Board Member shall make this declaration preferably at the beginning of the meeting.

This declaration shall be recorded, with its assessment and related decision, in the minutes of the meeting.

4.3 Assessment of declaration and decision

4.3.1 Ethical Committee

For the purpose of this policy, an Ethical Committee is established by the Executive Director. It is available to the Executive Director for consultation matters related to the “Code of Conduct for EASA Board of Appeal”.

The Ethical Committee shall be composed as a minimum of:

- The Head of Legal Department (chairperson) and one alternate from the Legal Department,
- The Executive Director’s Office Section Manager of the Agency and one alternate from the Executive Director’s Office,
- The Head of Human Resources Department and one alternate from the Human Resources Department,
- The Head of Finance & Procurement Department and one alternate from the Procurement Section,
- Two representatives of the Staff Committee and two alternates.

In addition, one representative – and one alternate - of another European Regulatory Agency dealing with Ethical matters, including Conflict of Interest shall be invited when a review of an Ethical Committee opinion is requested by a concerned

⁷ ‘close family members’ are considered to be the persons forming a household with the person making the declaration (spouse, partner, and/or dependent children).





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Board Member and/or the Chair of the Management Board (see paragraph 4.4). This representative and its alternate are not members of the Ethical Committee.

The first task of the Ethical Committee is to establish and adopt its own Rules in line with the Code of Conduct. These Rules shall include clear, objective criteria and the methodology for the assessment of the declaration of interests submitted to it and; also clear, objective criteria and methodology for the review of an opinion. The Ethical Committee issues a reasoned advice, without prejudice to the decision-making powers of the Agency body requesting it.

4.3.2 Public Annual Declaration of Interests

Before the Board Member takes up their function, and then on annual basis, his or her PADoI shall be screened by the Executive Director's Office of the Agency. In case a potential or actual Conflict of Interest is raised, the filled PADoI should be transmitted to the Executive Director for final assessment. The Executive Director may request an opinion from the Ethical Committee.

The Ethical Committee shall provide a documented opinion on the submitted declaration of interests to the Executive Director.

The Executive Director's Office shall inform the Chair of the Management Board with the Chair of the Board and the Executive Director in copy of the result of the assessment, including the Ethical Committee's opinion.

The Chair of the Management Board shall provide a documented reply on the assessment. This reply shall be sent to the Executive Director's Office within one month with the Chair of the Board of Appeal, the Executive Director and the Chair of the Ethical Committee in copy. This reply shall contain the final decision of the Chair of the Management Board, with justification.

In case no reply is received by the Executive Director's Office within the timeline, it will be considered that the Chair of the Management Board has decided not to take any measure to ensure the potential Conflict of Interest does not occur or to remedy to the actual Conflict of Interest. The Executive Director's Office will inform the Chair of the Board of Appeal with the Executive Director in copy.

In case the Chair of the Board of Appeal and/or the Executive Director is not satisfied with the decision taken by the Chair of the Management Board, this fact shall be mentioned in the next Board of Appeal meeting and noted in the minutes.

The Board Member shall be kept informed of the outcome of the assessment - and the related decision, when applicable – of his or her PADoI.

4.3.3 Oral Declaration of Interests

The Chair of the Board shall perform the assessment of any ODoI when declared, preferably before starting the meeting. The Chair of the Board shall take any measure considered appropriate to ensure that the potential Conflict of Interest does not occur or to remedy to the actual Conflict of Interest.

The assessment and the related decision, when applicable, shall be recorded in the minutes of the meeting.

The Board Member shall be kept informed of the outcome of the assessment - and the related decision, when applicable – of his or her ODoI.

4.4 Request for review

The Board Member and/or the Chair of the Management Board can request a review of the assessment. This request shall be sent within one month of the receipt of the assessment with a clear and complete justification for the revision to the Executive Director's Office with the Chair of the Board of Appeal and the Executive Director in copy.

The request will be transmitted to the Ethical Committee for review.





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In accordance with its own rules, the Ethical Committee will review the assessment by involving the representative, and its alternate, of an European Regulatory Agency as mentioned in paragraph 4.3.1.

The Executive Director's Office shall inform the Chair of the Management Board with the Chair of the Board and the Executive Director in copy of the result of the review.

The Board Member shall be kept informed of the outcome of the review.

4.5 Publication, recording and personal data protection

The Public Annual Declaration of Interests of all Board Members shall be published on the EASA web-site.

EASA shall process all declaration of interests in accordance with Regulation (EC) n°45/2001⁸

The Executive Director's Office controls the handling the Public Annual Declarations of Interests.

The conservation period of declaration of interests and the assessment; the related Ethical Committee opinion and reply of the Appointing Authority if any shall be 7 years.

The Board Members have a right to access to their respective declaration of interests - and to update or correct it at any time-, to the respective assessment and Ethical Committee opinion, if any, and to the reply of the Chair of the Management Board, if any.

In case the Agency has knowledge of information that is not consistent with the declared interests, or in case of failure to submit a declaration of interests when requested in this annex to the Code of Conduct, the Board Member will be contacted with the purposed to update the declaration of interests. In case an internal procedure is opened as referred to paragraph 6 of this policy, the Board Member will be notified.

5 Gifts, hospitality, decorations and honours

5.1 Declaration and registration

Board Members shall not accept any gift with a value of more than EUR150 related to their performance and duties as Board Member.

When in accordance with diplomatic and courtesy usage, they receive gifts worth more than this amount, they shall hand them over the Executive Director's Office. In case of doubt as to the value of a gift, an evaluation shall be undertaken under the authority of the Executive Director's Office, whose decision on the matter shall be final.

The Executive Director's Office shall keep a register of gifts with value more than EUR 150.

Board Members shall not accept hospitality except when in accordance with diplomatic and courtesy usage. Attendance upon invitation to any events where Board Members represent EASA shall not be considered as hospitality.

Board Members shall notify the Chair of the Management Board, the Chair of the Board of Appeal and the Executive Director's Office, of any decoration, prize or honour awarded to them in relation of their performance and duties for EASA. Should a prize include a sum of money or valuables, it should be donated to a charity of their choice.

5.2 Personal data protection

EASA shall process the gifts register in accordance with Regulation (EC) n°45/2001.

The Executive Director's Office controls the handling of the gifts register.

The Boar Members have a right to access their data within the gifts register to update or correct them at any time.

⁸ Regulation (EC) 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of the personal data by the Community institutions and bodies on the free movement of such data.





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6 Breach of this policy

In case the assessment of a declaration of interests results in an omission of relevant interests resulting in a potential or actual Conflict of Interest, it may be considered as a breach of this policy on declaration of interests. When the breach is confirmed, the Executive Director’s Office will request a decision from the Chair of the Management Board. The Executive Director’s Office shall keep informed the Chair of the Board of Appeal and the Executive Director

In case the Agency has knowledge of non-consistent information of the declaration of gifts, hospitality, invitations, honours, or in case of failure to declare, in line with the rules defined in paragraph 5, the Executive Director’s Office will request a decision from the Chair of the Management Board. The Executive Director’s Office shall keep informed the Chair of the Board Appeal and the Executive Director.

7 Training and information

Each new Board Member is encouraged to attend training on the Code of Conduct organised by the Agency. This training shall cover the management on Conflict of Interest as defined in this Code of Conduct.

In addition, the Board Members are encouraged to attend refresher training every three years. This can be delivered through a specific e-learning module.

In addition, the Agency will advertise on its web-site an information e-booklet on Conflict of Interest management for the members of the Board of Appeal.

EASA has implemented an Anti-Fraud Strategy with the aim of preventing Fraud. Controls have been put in place across departments in order to try to eliminate the possibility of Fraud occurring. All EASA policies have been written while keeping the topic of Fraud in mind, and therefore controls have been put in place to address areas of risk. Staff members should report (in writing) to their Head of Department and/or to the Executive Director who will decide whether to report the case to OLAF (European Anti-Fraud Office).

