

## COMPLIANCE CODE

*(This is a translation of the original document into English. The translation is not legally effective; only the original German version is legally effective)*

# «Friends of Novaya Gazeta Europe Association»

Version 1.0, Schaffhausen, 18. Juni 2022

## Why a Compliance Code

Due to its purpose, it is a central concern of the "Friends of Novaya Gazeta Europe" association and its Board to be open, transparent and trustworthy. The attitude and values of the Association and the Board as well as the rules for handling the funds are therefore recorded in the compliance code, which is binding for the Board and the Association management.

## Attitude and values of the «Friends of Novaya Gazeta Europe» association

- The association is committed to freedom of expression and freedom of the press, particularly in Europe and Russia. Primarily it falls within supporting the independent media "Novaya Gazeta. Europe" based in Riga (Latvia) with financial means and deeds, and secondly it acts under the Aim of the Association.
- The Association acts independently and is politically, socially and confessionally neutral as far as this reconciles with getting the Aim.
- By fulfilling its Aim, the Association promotes cooperation and solidarity among democratically thinking people, regardless of nation, language community, religion or gender.
- The Association does not accept donations from dubious sources. For donations of more than CHF 10.000, the donor must identify themselves to the Board. They also must meet the requirements of the Association bank(s).
- The Association has its finances checked regularly by an independent auditor.
- The Association Board of Directors always checks, with the involvement of suitable auditors, whether its actions correspond to the rules and values of the code.
- Personal data of members, sponsors and relatives are treated in accordance with the current data protection law (IPO)

## Attitudes and values of the Board

- The Board is voluntary.
- The Board is answering about transparency of its decisions and usage of the financial means of the Association (members' fees, donations, etc.) primarily to the Association members, secondly to society.
- The Board sticks to the principles of management: Fairness, Responsibility, Answerability, Openness and Transparency.
- Members of the Board do not take any loyalties or promises that may limit their independence as a member of the Board in their actions.

- Members of the Board disclose their interests (employers, party or union or administration board membership). In case of any conflict of interest, the member of the Board named therefore resigns the Board position if any related decisions are made.

### Rules of Handling Financial Funds

- The Board handles the financial funds carefully. It may be used firstly for expenses of the Association, then it may be used to reach the Aim of the Association.
- Members of the Board are withdrawn from any decisions concerned with payments to the relatives of the members of Association.
- Members of the Board may require compensation of the expense of their special deeds at the position. They are expected to minimize expenses at their best.
- Members of the Board may be compensated expenses of their special needs required by the position, if agreed by other members. The compensation must be open to the General Assembly and approved by the Assembly therefore.
- Due to openness reasons, the Association may be included into the trade register, which is not a must.

*Daniel Thueler, 18. June 2022*

**Agreed and signed by the Board of Directors 18 June 2022.**

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Name: Daniel Thüler

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Name: Tatiana Skakauskis

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Name: Dieter Herzmann