

Transparency International Greenland Code of Conduct of the Board

1. Introduction

- a. This Code of Conduct is based on the Umbrella Statement of Transparency International (TI) entitled "Mission, Vision, Values and Guiding Principles" that was agreed by the TI Annual Membership Meeting in Prague in 2001 updated 2007 and 2011.
- b. While the Umbrella Statement provides a broad ethical framework, this Code of Conduct reflects the particular needs of TI Greenland's Board
- c. The Members of TI Greenland's Board are committed to uphold the highest standards of integrity and accountability, to act according to the core values and guiding principles of TI and to promote these standards and principles.
- d. The Members of TI Greenland's Board are also aware that they have an important role to play in promoting the TI movement and its ideals to other stakeholders and to the wider public.
- e. This Code of Conduct is a living document. Its value to TI Greenland lies in its ability to create an enhancing environment for a culture of integrity.

2. TI Umbrella Statement

The Members of TI Greenland's Board agree to adhere to the TI Umbrella Statement, which is at Annex 1.

3. TI Conflict of Interest Policy

The Members of TI Greenland's Board agrees to comply fully with the Conflict of Interest Policy, which is at Annex 2, and to complete the Register of Interests which is at Annex 3.

4. Practical Guidelines

- a. The Members of TI Greenland's Board will treat each other with respect and consideration.
- b. The Members of TI Greenland's Board will communicate and consult with each other openly and in a collegiate manner that assists each of them to fulfill their duties and responsibilities faithfully and efficiently.
- c. The Members of TI Greenland's Board will respect the privacy and private lives of their colleagues when dealing with personal information.

I accept and adhere to the principles and terms of the Code of Conduct, including its three Annexes.

Name BOLETTE MAQE NIELSEN

Signature 

Date 3/6-2026

Annexes:

1. Statement of Mission, Vision, Values and Guiding Principles
2. TI Greenland Conflict of Interest Policy
3. Register of Interests of TI Greenland Board members

TI Statement of Mission, Vision, Values and Guiding Principles

Adopted by the TI Annual Membership Meeting (AMM) in Prague, 06 October 2001 updated by the TI AMM in Bali, 28 October 2007 and by the AMM in Berlin, 16 October 2011. Revised by the board 20. August 2024.

OUR MISSION

Our Mission is to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society. Our Core Values are: transparency, accountability, integrity, solidarity, courage, justice and democracy.

OUR VISION

Our Vision is a world in which government, politics, business, civil society and the daily lives of people are free of corruption.

OUR VALUES

- Transparency
- Accountability
- Integrity
- Solidarity
- Courage
- Justice
- Democracy

OUR GUIDING PRINCIPLES ARE:

1. As coalition-builders, we will work cooperatively with all individuals and groups, with for-profit and not-for-profit corporations and organizations, and with governments and international bodies committed to the fight against corruption, subject only to the policies and priorities set by our governing bodies.
2. We undertake to be open, honest and accountable in our relationships with everyone we work with, and with each other.
3. We will be democratic, politically non-partisan and non-sectarian in our work.
4. We will condemn bribery and corruption vigorously wherever it has been reliably identified.
5. The positions we take will be based on sound, objective and professional analysis and high standards of research.
6. We will only accept funding that does not compromise our ability to address issues freely, thoroughly and objectively.
7. We will provide accurate and timely reports of our activities to our stakeholders.
8. We will respect and encourage respect for fundamental human rights and freedom.
9. We are committed to building, working with and working through Chapters worldwide.
10. We will strive for balanced and diverse representation on our governing bodies, according to the Inatsisartut Act on Equality and anti-discrimination.
11. As one global movement, we stand in solidarity with each other and we will not act in ways that may adversely affect other Chapters or the TI movement as a whole.

TI Greenland Conflict of Interest Policy

Background

Conflicts of interest may arise from time to time in the course of the activities and decisions of persons associated with Transparency International Greenland as a Board member or staff member. These conflicts of interest may arise in their work for the TI movement with regard to pecuniary or financial interests, or interests that impede them in their duty to act in the best interests of TI Greenland and the wider TI movement.

1. Applicability

This policy applies, except as otherwise stated, to every person associated with TI Greenland as a Board member or staff member. The “interests of any person associated with TI Greenland” include the interests of that person’s spouse or partner.

2. General Policy

- a. Every person associated with TI Greenland (as defined in paragraph 1) must avoid or manage any potential, real or perceived conflict of interest (*inter alia* by refraining from any decision making or voting on matters subject to a potential conflict of interest), and openly acknowledge any potential or actual conflict of interest which arises through his/her association with TI Greenland.
- b. Members of the Board of TI Greenland and staff shall declare their financial and non-financial interests which could potentially lead to or could be perceived as a conflict of interest. Such declaration shall be made by way of a register, which shall be open to the public. Where there are personal safety or similar serious concerns about full publicity, parts or even the whole of the declaration should be submitted to the Chair of TI Greenland’s Ethics Committee (see para.7), who shall hold it, and act upon it as appropriate, in confidence.
- c. TI Greenland’s efforts to raise the ethical standards of government officials, businesspeople and other individuals could be compromised by any ethical lapses on the part of its Board members and staff members. It is essential that everyone associated with TI Greenland (as defined in para.1) be highly sensitive to potential conflicts of interest.

3. Remunerated Work Contracts and Consultancies

- a. Members of TI Greenland’s Board or companies or other organizations with which such Members are currently affiliated, may not perform remunerated work for TI Greenland. However, in exceptional circumstances, when agreed by the Board a member may be remunerated for work relating to an approved TI Greenland project which is clearly distinct from his/her role as a Board member.

- b. Members of TI Greenland's Board, or companies or other organizations with which such members are currently affiliated, may apply and compete for remunerated work contracts with any National Chapter or with the TI Secretariat, provided they are not offered any advantages over any competitors with respect to being awarded or carrying out such work. They must not utilize privileged information for personal benefit and do everything reasonable to contradict the perception of having utilized privileged information; in addition, they will not exercise their Board function to the extent it relates to the conditions of the contract or the selection or supervision of such contract. In other words, they do not need to be disqualified in such cases because of their affiliation with TI Greenland, but neither may they be given the "inside track".
- c. When doing non-TI related work, TI Greenland Board members or their companies shall not utilize privileged TI Greenland information for personal benefit.
- d. TI Greenland will be transparent in its decision-making processes when commissioning paid work.

4. Gifts and Entertainment

No person associated with TI Greenland shall accept any gift, entertainment, loan or anything else of value from any organization or individual if it could be reasonably construed or perceived that the gift is motivated by a wish to influence TI Greenland and/or the TI movement.

5. How to Deal with a Possible Conflict of Interest

- a. Potential conflicts of interest should be identified and declared by the person in potential conflict, or reported by others as soon as they become aware of such potential conflict of interest. If problems are identified before commitments are made or questionable actions have occurred, embarrassment can be avoided and alternatives can be explored.
- b. Such disclosure or report should be made to the Chair of TI Greenland's Ethics Committee.
- c. The evaluation of a potential conflict of interest must be made by the Ethics Committee of TI Greenland's Board (see para. 7) or by un-involved individuals such as members of the board. The evaluation may determine the absence of a conflict of interest, or it may lead to the conclusion that (i) the person facing a potential conflict of interest should not go ahead with the evaluated activity or that (ii) he/she should recuse him/herself from participating in decision making by TI Greenland with reference to the matter in conflict.
- d. The Chairperson of TI Greenland's Board is responsible for ensuring that all persons associated with TI Greenland (as defined in para. 1) are made aware of the policy and procedures regarding potential conflicts of interest. This Code of Conduct/Conflict of Interest Policy should be brought to the attention of TI Greenland's members through electronic or other means.

6. Disclosure of Payments

When a TI National Chapter or the TI Secretariat makes payments – excluding approved expenses and per diems for Board or project-related business – to a member of TI Greenland’s Board, this should be declared in full in the annual accounts and annual report of TI Greenland.

7. TI Greenland Board’s Ethics Committee

TI Greenland’s Board shall have an Ethics Committee for the purpose of providing advice on ethical questions to anybody associated with TI Greenland.

ANNEX 3

Register of Interests of TI Greenland

1. Each Member of TI Greenland's Board and staff shall declare in this Register any and all interests that could potentially lead to, or could be perceived as, a conflict of interest. Such interests shall include, but not be limited to:
 - a. any material affiliation (employment or directorship) with a public or private company or other organization, including longer-term or frequent relationships but excluding one-off short-term consultancies;
 - b. any non-remunerated affiliation with any public or private company or other organization that is relevant to TI Greenland's work;
 - c. significant (>5%) ownership or controlling position in any company or other organization;
 - d. a list of any companies, organizations or government financial instruments in which a member has more than 5% of his/her total assets; and
 - e. any public office.
2. As defined in para 1 of the Conflict of Interest Policy, the interests of Board Members, and staff shall include the interests of their spouses or partners.
3. As set forth in para. 2(b) of the Conflict of Interest Policy, this Register is open to the public.
4. The filing in this Register shall be made within six weeks of taking up the position of a Member of the Board or employed Director or Company Secretary and shall be updated in a timely fashion as changes occur.

Those already serving as Board members, employed directors and Company Secretary shall complete this Register no later than a month after the Code/Conflict of Interest Policy comes into effect.

5. In case of doubt, all those required to register their interests may request advice from the Board Ethics Committee as to whether an "interest" that is subject to registration exists.
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[Each member fills in the following table]

Name	Bolette Erna Mage Nielsen
Date on which initial statement lodged	3. June 2026
Remunerated affiliation	BMN Company ApS (Managing Director) CVR 12657218
Non-remunerated affiliation	Chairman of Greenland Strategic Minerals A/S (CVR 45764184)
Significant (>5%) ownership or controlling position	100% Ownership in BMN Company ApS (CVR 12657218)
Any companies, organizations or government financial instruments in which the person has more than 5% of his/her total assets	no
Public Office	
Other	