

Code of Conduct of the University of Luxembourg

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Purpose and scope

This Code of Conduct has been developed to provide principles and standards of behaviour applicable within the University of Luxembourg (the "University").

This Code of Conduct applies to the "University Community":

- All Bodies and committees of the University;
- University staff employed by or seconded or delegated to the University:
 - Academic staff, including doctoral- and postdoctoral researchers;
 - Administrative, financial and technical staff;
 - Individuals who are seconded or delegated to work at the University.
- Externals:
 - Seasonal student workers
 - Associate academic and research staff members: Affiliate Professors, Guest Professors, Honorary Professors, Adjunct teaching staff members¹;
 - Senior Professors and Emeritus Professors;
 - Consultants, contractors;
 - Individuals who perform services for the University as volunteers and who assert an association with the University.

The Students Charter (*Charte des Usagers*) annexed to the Study Regulations defines the rights and responsibilities of students² as part of the University's commitment to supporting its student community, but students are expected to adhere to the general principles and standards set out in this Code.

Visitors to the University should also adhere to the principles of this Code.

Complementary texts

This Code of Conduct must be read in conjunction with other official texts of the University, such as the [amended Law](#) of 27 June 2018 on the organisation of the University of Luxembourg, the [Internal Regulations](#) (ROI) including its hierarchies of norms, the [Study Regulations](#), the [Collective Bargaining Agreement](#) and the Policies and Charters in force. The Code complements and does not replace these texts.

The Code cannot address every situation and is not meant to be exhaustive. Additional and more detailed and explicit policies may govern particular organisational units, functions or committees within the University, such as the Charter of the Board of Governors. It is the responsibility of each person working in those units to be aware of and adhere to those policies.

In accordance with the amended Law of 16 April 1979, civil servants and State Employees must also respect the [Code of Conduct of the Civil Service](#).³

¹ As defined in Article 29 of the amended Law of 27 June 2018 on the organisation of the University of Luxembourg.

² Students in this context means "usager" of the University as defined in Article 1(11) and (12) of the amended Law of 27 June 2018 on the organisation of the University of Luxembourg.

³ In accordance with the amended Law of April 16, 1979 setting the general status of civil servants and the amended law of March 25, 2015 determining the status and allowances of state employees.

1. Leading principles promoted in this Code

As members of the university community, we are committed to maintaining the highest standards of conduct, ethical behaviour and scientific integrity.

This Code provides a framework to guide us in meeting our obligations as members of the University community, in line with the University's aim to achieve the highest standards of international excellence in research and teaching, while also fully meeting its distinctive responsibilities as the country's sole public institution of research and higher education.

In accordance with Article 19 of the amended Law of 27 June 2018 on the organisation of the University of Luxembourg, academic freedom is a fundamental principle of the University, providing for freedom of thought and expression in teaching and research.

1.1 The environment we want to foster at the University

A positive working environment

We aim to create and maintain a positive environment in which all members of the University community respect each other, as well as a climate of mutual support and cooperation.

We are committed to promoting fairness, inclusion, respect, human dignity, courtesy, transparency, integrity, including scientific integrity.

We are also committed to avoiding any unethical actions that undermine our reputation, integrity and commitment to trust and respect, including preventing harassment as mentioned in the [Collective Bargaining Agreement](#) and the Labour law (*Code du Travail*).

A place of diversity and equal employment opportunity

We acknowledge that the differences in backgrounds and experiences are a strength for our international, multilingual and interdisciplinary University. With this in mind, the University has signed the [Luxembourg Charter for Diversity](#). We work towards a culture enabling equal, respectful and supportive interactions beyond all discrimination.

We maintain at all times an attitude consistent with the willingness of the University to be an equal opportunity employer.

We do not tolerate against any individual any act constituting moral or sexual harassment, violence or discrimination, in particular on the grounds of gender, race, colour, ethnic or social origin, genetic features, language, religion or belief, membership of a national minority, property, birth, disability, age or sexual orientation, political or any other opinion provided that the expression of such opinions respects this Code. We should offer support to those who are a victim of discrimination, violence or harassment.

A spirit of open communication and good cooperation

Each of us is responsible for creating and promoting a productive work environment for the benefit of the University community by demonstrating a spirit of cooperation and good faith and communicating in an open, transparent and respectful manner. We shall also be expected to foster an atmosphere beneficial to good working relations, to enhancing the University's reputation, and to preventing the emergence of personal conflicts. When conflicts arise, we try to manage them amicably.

Line managers should formulate clear instructions and set realistic goals and deadlines. They provide constructive, honest and courteous feedback to their employees on their performance and achievements.

They also encourage their employees to give constructive feedback on their own performance. Staff members must be treated and evaluated respectfully, with regards to their job description and without favoritism.

Staff members must carry out their responsibilities with loyalty to the University and to the best of their ability. Any member of staff who, in the performance of their responsibilities, encounters serious problems with their manager has the right to inform the Human Resources Department, without incurring reproach.

We are committed to open and transparent collaboration and to sharing information appropriately with colleagues. We are also committed to presenting a professional image of the University in our interactions with internal and external stakeholders.

A safe and healthy working environment

We are committed to maintaining a safe and healthy working environment, avoiding behaviour that may pose risks to our health and safety or that of other users of the University.

In particular, we are prohibited from bringing or using illegal or inappropriate products or objects in our workplace, or from working under the influence of alcohol or drugs.

When dangerous products or objects are necessary for our work at the University, we take appropriate protective measures to ensure their safe use.

We will report any workplace accidents or situations or materials that may pose a risk to occupational health and safety to our line manager, as well as to the [University Facility Management](#) (Safety & Services.)

1.2 General principles

We must carry out our professional responsibilities with care, diligence and integrity, and our behaviour towards our colleagues and others must be consistent with the principles of this Code

Scientific integrity

We will conduct our research in accordance with the highest standards of ethics and integrity and in accordance with research principles and best practices, as set out in the [European Code of Conduct for Research Integrity](#) and the [European Charter for Researchers](#). Training and consultations on scientific integrity are offered by the University and also by the [Luxembourg Agency for Research Integrity](#).

Privacy and data protection

We will not disclose without authorization any confidential, privileged, personal or sensitive data and information acquired in connection with our University activities. We will not use them for personal purposes under any circumstances.

We value discretion and will respect at all times the privacy of employees, students and all people we work with at all times. We avoid disclosing their personal information without an appropriate reason, even in the case of non-sensitive data.

We will respect the University's [Data Protection Policy](#) when undertaking our University activities.

Disciplinary measures

Failure to comply with the principles of the Code of Conduct may result in disciplinary measures. For external staff, these can go up to termination of contract. For staff employed by or seconded to the

University, disciplinary measures will be in accordance with, respectively, the provisions of the [Collective Bargaining Agreement](#), or the laws relating to the status of civil servants and state employees, up to termination of the employment relationship.

Personal obligation

We commit to read and to comply fully with the Code of Conduct.

Managers should champion the Code of Conduct and act as role models by following the Code's principles and behaviours.

2. Conflicts of Interest

A conflict of interest within the meaning of this Code is a situation where family or emotional relations, political or national affinity, economic interest or any other direct or indirect personal interest are likely to influence the exercise of our professional duties and responsibilities.

Conflicts of interest must in no way compromise the neutral and impartial exercise of our University duties and responsibilities, nor harm the reputation of the University.

In the event of a situation that creates or appears to create a conflict between our interests (personal, financial or other) and the interests of the University, we will immediately report the situation to our immediate supervisor and the Human Resources Department, and will immediately take all necessary steps to resolve it.

2.1 Non-exhaustive typology of frequent conflicts of interest

Accessory activities

Full-time academic staff may engage in paid accessory activities⁴. They do so under their own name, on their own behalf and under their own responsibility. Academic staff's accessory activities must be compatible with their duties at the University and in no way interfere with the performance of those duties. These accessory activities must be authorised by the Rector.

Part-time academic staff as well as administrative, financial and technical staff who engage in paid accessory activities must inform the University.

More information, as well as a non-exhaustive set of examples, is available on the [accessory activities intranet page](#).

Personal Relationships – Family and close relations

For the purposes of this Code, a close relation means a person with whom we have a family relationship, as well as any person with whom we have or have had a personal relationship in the recent past in the context of their private life.

Personal relationships must in no way compromise the professional and impartial exercise of our University duties and responsibilities.

As soon as we are informed that we should take part, in an advisory or decision-making capacity, in a decision concerning a close relation or likely to confer a direct or indirect benefit on a close relation, we

⁴ As defined in Article 22 of the amended law of 27 June 2018 on the organisation of the University of Luxembourg.

should immediately withdraw from the decision-making process.

More specifically we shall not:

- influence or become involved in decisions that impact the recruitment, career or university journey of a close relation;
- favour in any way our close relations in the context of participation in projects in which the University participates or in which it has a direct or indirect interest;
- favour close relations by sending them information obtained in the course of our duties at the University which could benefit them in any way;
- conclude, without objective justification and in disregard of the University's purchasing policy, purchases or service contracts where our close relations could derive a direct or indirect advantage to the detriment of the University.

Members of bodies and committees of the University

Members of the University's bodies and committees shall refrain from taking part in any discussion or decision concerning matters where there is a conflict of interest on their part.

This obligation applies in particular when the persons concerned exercise several roles, the combined exercise of which necessarily leads to a situation of conflict of interest, for example, when a person involved in a research project is also a member of the body supposed to evaluate the results of that research.

3. Restrictions on gifts

We do not solicit or accept gifts, whether monetary or non-monetary, or favors, unless their value is likely to be considered by an objective, reasonable and informed third party to be insignificant or negligible.

As a general principle, we do not accept gifts connected to our employment at the University, to prevent any perception of impropriety or conflict of interest.

However gifts of a token value, such as minor items of food, drink or stationery can be accepted. Similarly, functional and proportionate hospitality such as an invitation to a business meal can be accepted where it is unlikely to create a conflict with our University responsibilities. Gifts beyond this scope should be refused or returned to the donor or, if not practical, given to the University to avoid any perception of personal advantage.

We should also be conscious that donors may offer gifts to members of our immediate family with the intention of influencing University activity, and that this should be avoided.

If there is any doubt about the value or appropriateness of the gift or invitation, we will consult with our line manager, Dean or Director.

Donations and contributions to the University are subject to separate provisions presented in the [ROI](#) and the [Fundraising Policy](#) (internal)

4. Use of University Resources

We use the University's resources only for the purpose of achieving the University's goals and promoting its interests.

As a public institution largely financed mainly by the government, it is essential to maintain the highest standards in terms of financial management of the public funds entrusted to us.

Therefore the use of University resources must be reserved exclusively for the University's missions. These resources must be used responsibly and may not be used for personal purposes.

University members are the most important resource of the University, and as such we will use their services solely for official purposes on behalf of the University and not for personal or private purposes.

Further University resources include, but are not limited to, the use of facilities, equipment such as computers and peripherals, University vehicles, University systems such as telephone systems, communication and IT systems, badges or the use of procurement tools such as purchasing cards.

We may not associate or use the University's image or logos in the context of our private activities without the prior written consent of the University.

5. Implementation of the Code of Conduct

5.1 Clarification

We may have concerns and questions about how to properly handle the situations referred to in this Code. We should seek advice where necessary with the appropriate resource.

We can raise questions about clarifying the Code of Conduct by first addressing our line manager. The Human Resources Department, the Ombuds, the Staff Delegation and other organizational resources of the University, such as those mentioned in the Annex, may also be approached for advice.

5.2 How to report violations or raise concerns

We should report any act or failure that violates this Code of Conduct or applicable laws and regulations.

We condemn any form of dishonesty, including misuse of University funds or property, fraud, theft, cheating, academic misconduct, plagiarism, or falsehoods about the University.

We may report a breach of the Code of Conduct to our line manager or raise concerns about serious indications of a breach. If a discussion with the line manager is deemed undesirable, or if the line manager are themselves involved, the question or problem may be referred to an appropriate organizational resource, such as the line manager of the manager in question, the Human Resources Department or the Staff Delegation. The Ombuds may be consulted about concerns, but managing reports of breaches are not part of their mission.

If the line manager needs advice on how to address with the problem, they can also approach an appropriate organizational resource as mentioned above.

A report of a violation of national or directly applicable European law can be made via the whistleblowing channel. The University will treat such reports as formal complaints. Cases that do not fall within this scope must be reported through other University channels, such as those indicated in the Annex.

The police and/or the Court of Auditors may be contacted when circumstances reasonably indicate fraud or theft of University funds.

5.3 University support to raising concerns

We work in an environment in which concerns can be reported without fear of retaliation.

Any form of retaliation against persons raising concerns in good faith is prohibited. If we believe we have suffered retaliation, we should inform our line manager or we may also consult an appropriate organizational resource such as the Human Resources Department or the Staff Delegation.

Deliberate false reporting is not tolerated. The University will take appropriate disciplinary action against individuals who knowingly make a false report.

5.4 Obligation of the University to follow up on the issues reported

Each written report will be appropriately assessed to determine what action needs to be taken within a reasonable period of time. Depending on the nature and seriousness of the reported facts, an investigation may be initiated, as well as other follow-up measures.

The University ensures these situations are treated in confidence and with respect and dignity for the people involved.

Annex I: Roles and Responsibilities within the University relating to advice on the Code of Conduct

In alphabetical order.

More information is also available on the [intranet](#) (internal).

The [Animal Experimentation Ethics Committee](#) examines and deliver an opinion on projects that use animals for scientific purposes.

The [Data Protection Office](#) provides training and advice on the protection of personal data to the University's employees and management. It also carries out compliance checks in accordance with the mission assigned to it within the General Data Protection Regulation.

The [Doctoral Schools](#) bring together the doctoral programs of their Faculty disciplines. In close collaboration with thesis supervisors, they manage their doctoral candidates' training path, including the course organization, ECTS acquisition, and the proper functioning of thesis supervision committees (CETs) and examination boards.

The [Ethics Advisory Committee](#) advises on ethical issues related to the university community, at the request of the University Council or the Rectorate.

The [Ethics Review Panel](#) evaluates the ethical aspects of research projects carried out at the University to ensure that ethical considerations are met and good scientific practices are followed.

The [Facility Management Department \(Safety & Services\)](#) coordinates and improves occupational health and safety procedures and resources to support a healthy and safe work environment.

The [Gender Equality Officer](#) assists the Rectorate in building and implementing a University gender equality policy.

The [Human Resources Department](#) provides general information to staff on employment policies, including the Code of Conduct.

The [Inclusion Office](#) and the [Committee for Reasonable Accommodations](#) work together to ensure that necessary and appropriate modifications are in place to meet the specific needs of students with respect to their education and personal well-being.

The [Information Security Office](#) is dedicated to safeguarding the University's information assets, by protecting the confidentiality, integrity, and availability of the University's information.

The [Legal Office](#) supports faculties, interdisciplinary centres and administrative departments or services by providing legal advice and assistance in the management of contracts and disputes.

The **Line Manager** is the first resource recommended for clarification on a policy, regulation or law related to the provisions of this Code of Conduct. If the line manager is unable to provide answers, the next-level manager, such as the head of Department, the Dean or Director, may be consulted. Other resources for specific topics or areas of support are suggested in this annex.

The [Office of Doctoral Studies](#) (BED) centralises all procedures and communication (applications to accept PhD candidates, reports, recommendations, thesis defence requests, etc.) related to doctoral studies. The BED is the intermediary between the PhD supervisor, the doctoral candidate and the Rectorate.

The [Ombuds team](#) provides confidential, independent, impartial, and informal services to the University community, with the aim to create a safe environment for individuals to raise questions and concerns and discuss possible options for resolution. The Ombuds team does not take administrative decisions, nor can they revise disciplinary measures.

The [PaKTT Office](#) supports projects from their conception to the valorisation of the scientific results. Its main objectives are to promote science, disseminate knowledge and support social innovation and positive impacts by transferring intellectual property rights to existing companies, newly created spin-offs, public institutions and civil society organizations.

The [Procurement Office](#) defines the [University's procurement policy](#) aimed at optimising the balance between price, quality and user satisfaction.

The [Secretary-General to the Board of Governors](#) can provide advice on ROI issues.

The [Staff Delegation](#) safeguards and defends the interests of the University's salaried employees in terms of working conditions, job security and social status. Please also consult [the webpage of the Staff Delegation](#) (internal).

Annex II: Definitions

Confidential or Privileged Information : non-public information relating to the operation of any part of the University, including, but not limited to, designated documents, medical records, personal information or background of individuals; anticipated equipment requirements or pricing actions; knowledge of possible new sites for University-funded operations; knowledge of forthcoming programmes or selections of contractors or sub-contractors prior to publication of official announcements; and knowledge of investment decisions.

Conflict of interest:

- **Actual:** where there is a direct conflict between University responsibilities and a competing interest or obligation.
- **Potential:** where there are interests or obligation that could conflict with the performance of University responsibilities in the future.
- **Perceived:** where it could reasonably be perceived, or give the appearance, that a competing interest could improperly influence the performance of University responsibilities.

Discrimination : Discrimination means treating a person unfairly because of who they are or because they possess certain characteristics. The [European Charter of Fundamental Rights](#) prohibits any discrimination based on any ground such as 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.

Employees : salaried staff of the University and external staff such as Affiliate Professors, Guest Professors, Honorary Professors.

Family relationship: spouse or equivalent partner, relatives up to and including the [fourth degree](#).

Gift : any gratuity, entertainment, hospitality, loan, or other tangible or intangible item having monetary value, including but not limited to, cash, food and drink, and honoraria for speaking engagements related to or attributable to the official position of a University employee.

Investigation: a formal collection, examination and evaluation of relevant information to determine whether misconduct has taken place or, if misconduct has already been confirmed, to assess its extent and consequences or determine appropriate action.

Moral harassment : any conduct which, by its repetition or systemization, undermines the dignity or the psychological or physical integrity of a person, as defined in the Luxembourg Labour Code.

Personal data : any information of any type, regardless of the medium, including images and audio or video material, relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number or one or more factors specific to his/her physical, physiological, mental, economic, cultural or social identity.

Sensitive data : is special categories of personal data in the meaning of the GDPR. Special categories of personal data are personal data revealing: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership or genetic data, or biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

Sexual harassment : the Luxembourg Labour Code defines sexual harassment in the context of employment relations as any behaviour with a sexual connotation or any other behaviour based on sex which the perpetrator knows or ought to know affects the dignity of a person in the workplace, where one of the following conditions is met:

- the behavior is unwanted, untimely, abusive and hurtful for the recipient;
- the fact that a person refuses or accepts such behaviour on the part of the employer, an employee, a client or a supplier is used explicitly or implicitly as the basis for a decision affecting the recipient's rights in relation to professional training, employment, job retention, promotion, pay, or for any other decision relating to employment;
- the behaviour creates an intimidating, hostile, degrading, humiliating or offensive environment for the recipient.

The behaviour may be physical, verbal or non-verbal. The intentional element of the conduct is presumed.