



Business Integrity Management System – BIMS

GEUS' business integrity management system (BIMS) encompasses the following elements:

- GEUS' policy on business integrity indicating organisational conduct.
- GEUS' Code of Conduct, which in specified areas establishes the ground rules for management and employee behaviour
- GEUS' policy on quality assurance, describing the routines, procedures and organisational measures observed in GEUS' projects to ensure the quality of services and products.

All three elements have been collected in this document, which constitutes GEUS' Business Integrity Management System.

It has not been possible to write down rules and procedures for all situations imaginable. Therefore, the Business Integrity Management System is based on the assumption that employees in GEUS are able to act properly in situations where "right" or "wrong" is not clearly indicated. This requires a strong corporate culture based on GEUS' core values and implemented in *GEUS' vision, mission and values*.

Supplementary guidelines and clarification of the Business Integrity Management System are available in GEUS' Staff Handbook and Project Handbook.

This document is available on the GEUS website and may be attached to contracts.

GEUS' Business Integrity Policy

GEUS' policy on business integrity specifies the goals that the organisation strives to meet in its capacity as a governmental research institution providing considerable advisory service activities for the public as well as the private sector.

- GEUS is a public institution which is subject to Danish legislation and is working in accordance with Act no. 536 of 6 June 2007 – The Geological Survey of Denmark and Greenland Act.

- GEUS complies with international conventions acceded to by the Danish government.
- GEUS refrains from actions which are in contravention of acts and regulations at national as well as international level.
- GEUS, as a public institution, builds on values such as openness, democracy, legal rights, integrity, competency and loyalty.
- GEUS conducts research at the highest international level on conditions significant for exploitation of the geological natural assets in Denmark and Greenland.
- GEUS strives to promote sustainable development which takes into account economic, environmental and social conditions.
- GEUS carries out its assignments flexibly and efficiently and provides high-quality services.
- GEUS observes full discretion with regard to the affairs of its customers and collaboration partners.
- GEUS undertakes advisory assignments within areas where GEUS has relevant competences and the resources required.
- GEUS cooperates with other institutions and organisations but, for the benefit of customers, GEUS does not make agreements that prevent free competition.
- GEUS respects the intellectual property rights of other institutions and organisations.
- GEUS distances itself from any type of corruption, and as an institution, will work against corruption at national as well as international level.
- GEUS will inform customers and collaboration partners about any matters involving incompetence or other conditions which may be of relevance to professional consultancy.

GEUS' Code of Conduct

Fundamental values and principles

GEUS is an autonomous, independent research institution under the Danish Ministry of Climate and Energy, responsible for scientific exploration of geological conditions in Denmark and Greenland.

GEUS conducts research at the highest international level on conditions significant for exploitation of the geological natural assets in Denmark and Greenland.

GEUS is a significant geological advisor for public authorities on nature, environmental, climate, energy and minerals issues.

GEUS' VISION – Geology for a changing society

GEUS is an internationally recognised, and in selected areas, leading, research and consultancy institution within environmental geology, water resources, energy and minerals.

GEUS is the pivotal institution in advice for Danish and Greenlandic authorities on all issues for which geological conditions are significant.

GEUS is the Danish national geological data centre, internationally at the leading edge, which ensures credible and independent information for the benefit of the public and businesses.

GEUS is an attractive workplace, where ethical standards and social values are essential for the corporate culture.

GEUS is active in advancing geology and pushing the limits of the science.

GEUS is an exemplary creator of partnerships with other research institutions, as well as businesses and international organisations.

GEUS, in cooperation with partners at Geocenter Denmark, is an international research centre which attracts guest researchers and PhD students.

GEUS is a visible player in international development assistance for exploitation and protection of geological natural resources.

GEUS is visible in society and communicates geological knowledge to the public in an easily accessible manner.

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GEUS is visible in society and communicates geological knowledge to the public in an easily accessible manner.

GEUS strives to promote sustainable development which takes into account economic, environmental and social conditions.

GEUS strives to carry out its responsibilities flexibly and efficiently and to provide high-quality services.

GEUS supports the commitment and job satisfaction of employees wherever possible.

GEUS works in accordance with the GEUS Act and in accordance with general legislation such as the Public Administration Act and the Freedom of Information Act.

GEUS may accept assignments as an advisor within its core fields and where GEUS has special expertise, in return for part or full payment, for authorities and domestic and international private clients.

Authority to give instructions

Routine work at GEUS is characterised by open dialogue, informal teamwork, and extensive delegation of tasks and responsibilities.

However, in accordance with principles of management rights and authority to give instructions, a superior may issue orders to a subordinate who, according to the authority to give instructions, must comply with an order (duty to obey).

Conflicts of interest

GEUS may accept assignments, in return for part or full payment, for domestic as well as international public-sector and private enterprises and organisations, and must operate in accordance with the regulations for revenue-funded activities in public institutions, meaning that prices are set without distorting competition.

GEUS strives for an open and transparent dialogue with clients and uses the knowledge it acquires for the benefit of clients, the public sector and the Danish people.

In principle GEUS wants new knowledge to be made available to the public, but in certain circumstances accepts confidentiality of data for a limited period as a condition for having such knowledge made available, provided this does not conflict with legislation.

Freedom of speech and duty of confidentiality

Like other Danish citizens, GEUS employees are protected by the provisions of the Danish Constitution on freedom of speech, and they may participate in the public debate on their own account and state personal opinions and views, including those relating to GEUS' own fields of work. Employees should ensure that it is clear that their statements are on their own account. The management of GEUS may stipulate regulations on who may make statements on behalf of GEUS in general and in special circumstances.

Employees at GEUS (incl. students, guest researchers etc.) have a duty of confidentiality pursuant to the Public Administration Act and the Penal Code.

If an employee is contacted by the press or a representative from some other media regarding a matter on which the employee is working, the employee may make a statement and divulge specific, non-confidential information on behalf of GEUS, if the employee has the necessary insight and knowledge of the matter. If the enquiry relates to a matter being carried out for a private client, the employee may make a statement in accordance with the basis for the agreement and also refer to the client.

Statements made by a GEUS employee on behalf of GEUS to the press etc. must always be reported to their relevant superiors.

Statements made as a private person involve no duty to report to a superior. If an employee makes a statement as a private person, the employee is advised to make this clear to the relevant journalist.

Competency

GEUS observes the regulations on competency as described in the Public Administration Act. GEUS employees must be impartial and they must only make decisions on an objective and scientific basis.

Employees who are disqualified from dealing with a specific matter have a duty to inform their immediate superior and they may not take part in processing and deciding the specific matter.

Respect for the law in Denmark and abroad

In its work in Denmark, GEUS will not act in conflict with legislation and regulations which apply in Denmark. The same applies for the legislation and regulations of other countries in which GEUS operates.

Personal conduct

GEUS respects the private lives of employees and it will not seek to regulate personal conduct, unless the conduct of the relevant person restricts completion of a task or is incompatible with the professional role of a GEUS employee. It should be noted that during a posting in which the distinction between private and personal life is not necessarily particularly clear, it may be necessary to ensure that the employee also maintains a reasonable personal conduct in his or her private life.

Receipt of gifts

GEUS observes current Danish legislation on restrictions on receiving gifts. These regulations are also considered by GEUS as applicable for work in other countries.

Therefore, GEUS employees will not give, ask for, or receive any gift, service or other benefit for themselves or their families or their friends, which may influence performance of the work of GEUS. This does not apply, however, for conventional hospitality or small gifts of symbolic value.

Anti-corruption and non-discrimination

GEUS endorses the "Anti-Corruption Code of Conduct" issued by the Ministry of Foreign Affairs (Danida) and does not tolerate corruption in any form. GEUS employees have an ethical responsibility to combat corruption and must present a good example when working outside Danish borders.

Danida anti-corruption code of conduct

1. We will avoid any conflict - real or potential - between our personal interests and the interests of Danida. We will promptly report any occurrence of such conflict.
2. We will not seek to influence for private purposes any person or body by using our official position or offering them personal advantages. Likewise, we will not use public property, facilities, services and financial resources for private purposes except when permission is lawfully given.
3. We respect the laws of the countries in which we work.
4. We will ensure that our private conduct does not compromise our role as Danida employees.
5. We will not give, solicit or receive, directly or indirectly, any gift or other favour that may influence the exercise of our function, performance of duty or judgment. This does not include conventional hospitality or minor gifts.
6. In accordance with the principle of »zero tolerance«, we are obliged to report suspicion or evidence of corruption committed by colleagues or others.
7. We will strive to achieve maximum openness and transparency towards our external constituencies. However, confidentiality will be applied when necessary to safeguard the rights of our partners, staff and others.
8. In our work we do not discriminate in respect of gender, colour of skin, religion, culture, education, social status, ethnic affiliation or nationality.
9. We will make our Code of Conduct known to our professional partners.
10. We will respect the principles of the Code and we will report any evidence or suspicion of breaches of the Code. The responsible superiors will ensure the legal rights and due protection of the whistleblower and the accused before, during and after any investigation.

GEUS operates in a socially responsible manner within the framework of the legislation, the culture, and the traditions applicable in the countries in which GEUS works, provided this does not conflict with Danish legislation.

Organisation of employees

GEUS employees are free to organise in trade unions, and groups with more than five employees may elect a shop

steward. The largest groups at GEUS are the Danish Confederation of Professional Associations (AC), HK/stat and Dansk Laborant Forening (both under the Union of Commercial and Clerical Employees in Denmark (HK), PROSA, and Teknisk Landsforbund (TL).

GEUS has a works council with members from management and employees' shop stewards. The responsibilities of the works council are to develop cooperation throughout GEUS for the benefit of both GEUS and the individual employee.

Employees' secondary occupations

Employees must have permission from GEUS for a secondary occupation outside duty hours for GEUS, if the occupation is associated with the field of work of employees or if the occupation could be in conflict with the interests of GEUS. Secondary occupation within normal duty hours for GEUS always requires permission.

'The head of human resources at GEUS must be informed if an employee accepts work as a supervisor for graduates or PhD students, or as a teacher or examiner.

Responsibility

Employees must observe the regulations applicable for their position and for performance of their work. It is expected that employees will otherwise behave in a manner consistent with their service.

If, either during the performance of their work or in their spare time, employees do not observe the conduct requirements consequential upon their position and thus commit misconduct, GEUS has various sanctions against the employee, including disciplinary warning and dismissal.

Reaction options for employees

In the event of any disagreement between an employee and the GEUS management, the employee may seek support through his or her shop steward. The employee may also go directly to his or her trade union, complain to the Parliamentary Commissioner for Civil and Military Administration in Denmark, or apply to the courts.

The employee is entitled to divulge non-confidential information to external parties if there may be questions of illegal administration or other criticisable matters, including blatant misuse of public funds. However, it is recommended that initially the employee and management seek to clarify doubts regarding a specific situation internally.

Openness regarding the GEUS Code of Conduct and breach of this

The GEUS Code of Conduct is available on the GEUS website and may be attached to contracts.

GEUS will make public any breaches of the Code of Conduct.

GEUS' Quality Management System (QMS)

The general quality management system (QMS) at GEUS is an integrated part of the Business Integrity Management System (BIMS) and it is based on the international quality management standards. The procedures for Internal Audit focus on laboratories, data archives and the reporting system. As regards the management procedures for project implementation, the QMS is a part of the GEUS methodology for administration and organisation of GEUS projects, including the division of roles and responsibilities during project implementation. Furthermore the QMS is based on the Guidelines for Business Integrity Management from the international consulting federation FIDIC.

GEUS' objective in the QMS is to provide competent consulting services at a high level of expertise, thereby ensuring that value is added to the Client's organisation.

Quality Assurance (QA) Approach

GEUS' prime objective is to implement projects in a manner which conforms to good professional practice, including contractual and regulatory requirements. A guiding principle for our QA approach is to link it as closely as possible to the actual implementation activities of the services. The QA approach includes work processes as well as results, maintaining a focus on the practical implementation of the different tasks and the roles of the services. The approach also involves being ready to adjust the direction of services and to allow for early corrective measures.

Scope and Level of Quality Assurance

In addition to development of an effective quality control system, GEUS will endeavour to prepare a Quality Assurance Plan within the first three weeks of an assignment which, in accordance with GEUS' project implementation methodology, is decided at the kick-off meeting. In accordance with the QA philosophy of GEUS, two control levels for projects are defined.

The two levels of quality control are:

- 1) Normal control - carried out by the services directly involved in the execution of tasks. This involves checks on project elements, for instance control of outputs and assumptions, methodologies, systems for data collection and procedure descriptions, etc.
- 2) Extended control - carried out for selected elements of the work. This will involve the participation of resource persons of the sub-consultants as required. It is envisaged that extended control is performed in connection with the preparation of the individual project reports as well as the overall final report.

Corrective Actions

Corrective actions are carried out to remedy the effects of non-compliance and prevent repetition, or to introduce changes required by the Client.

It must be ensured that the causes of non-compliance are found and that:

- the incorrect solution is no longer used;
- the alteration is subject to the same quality assurance procedures as the original solution;
- everyone affected before the alteration is performed evaluates the consequences of the alteration;
- if necessary, current procedures are altered to prevent repetition of the type of non-compliance in question.

Organisation and Responsibilities

According to GEUS' project methodology, the different roles and responsibilities of the QA are as follows:

A GEUS Project Director is appointed to all projects. If not otherwise specified, this will be the Head of the Department of the Project Manager. The Project Director will then be the person responsible for ensuring that the Project Manager has established the QA organisation and procedures.

The GEUS Project Manager refers to the Project Director if such a person is appointed and the Project Manager is responsible for ensuring that the team members understand and carry out their QA functions.

The GEUS Quality Assurance Manager is responsible for ensuring that QA procedures are applied to a project. The Quality Assurance Manager has to be a highly experienced staff member who is not involved in the implementation of the project.

All GEUS Team Members are responsible for the quality of their own work, including check-up on everything they produce. This involves e.g. proper understanding and implementation of QA measures, adequate performance, selection of appropriate control check levels and co-ordination with other team members.

All Sub-consultants are responsible to GEUS for the quality of their own work including check-up on everything they produce. This involves e.g. proper understanding and implementation of QA measures, adequate staff performance, selection of appropriate control check levels, and co-ordination with GEUS Project Manager.

Accounting Structures

GEUS has a standard procedure for processing and paying invoices from external suppliers and staff expense claims. The invoice or claim is reviewed and checked by the Financial Controller. This involves a detailed review of all receipts to make sure that expenditures are legiti-

mate, that there are original receipts attached for all appropriate costs and that the costs can be claimed against the main contract. Once the Financial Controller has checked the costs, broken down the costs to the relevant accounting codes, and signed the invoice or expense claim, the Project Manager checks and approves payments. The annual financial audit includes reviews of both the annual accounts and the accounting system in order to ensure that adequate controls are in place.

Quality Assurance Reporting

GEUS has introduced a QA Form to ensure more systematic follow-up on QA activities, see below. In principle, every time there is a report or other concrete output it will be subject to QA. The form is used to clearly identify the level of QA that was carried out and signed by the Project Manager and the QA Manager.

Quality Assurance Form

Contract: _____

Project: _____

Title of Report: _____

Edition and Date: _____

Prepared by: _____

GEUS Project no.: _____

We, the undersigned, have carried out quality assurance of the above report/document.
The quality control has included the following aspects (tick as appropriate):

	N/A	YES	NO
1. Purpose of report clearly described	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Background and prerequisites realistically analysed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Methodology outlined	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Summary, conclusions and recommendations presented concisely	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Report linguistically correct	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Tables, figures, appendices, etc. correctly placed and numbered with indication of source of information	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Instructions related to layout and contents adhered to	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Overall professional quality and content of report acceptable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If an item is ticked with a "no", comments and explanations should be given on page 2 with reference to the item number. Suggestions for corrections or improvements should also be included as appropriate (these could also be indicated directly on the relevant pages of the draft report).

Date: _____

QA Manager

Project Manager

