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COMMITTEE OF EXPERTS ON THE EVALUATION OF ANTI-MONEY LAUNDERING MEASURES AND THE FINANCING OF TERRORISM

MONEYVAL

Principles of conduct during the mutual evaluation process for members of Mutual Evaluation Teams

The Council of Europe has established a comprehensive internal ethics framework designed to uphold the highest standards of integrity, impartiality, professionalism, and accountability among its staff and representatives. This internal framework is articulated through a range of ethical texts, including: (i) the Code of Conduct; (ii) the Speak Up Policy; (iii) the Policy on Respect and Dignity; (iii) the Policy on Diversity, Equality and Inclusion. Both Council of Europe secretariat's staff members and all those involved with the Organisation's activities are expected to uphold the values and respect these standards, to the extent that they are applicable to them.

When the MONEYVAL Secretariat contacts a national expert to seek confirmation of his/her participation in an upcoming country evaluation the present document is sent to inform him/her about the expected conduct of an evaluator. In addition to the afore-mentioned Council of Europe ethical standards, by confirming their participation in a country evaluation, national experts agree to respect and follow the requirements set out in this document in their capacity as MONEYVAL evaluators. Furthermore, a Declaration of confidentiality and proper conduct shall be signed by each evaluator taking part in a MONEYVAL evaluation.

PRINCIPLES OF CONDUCT DURING THE MUTUAL EVALUATION PROCESS

a. Professionalism and general values

1. Throughout the entire evaluation process, the MONEYVAL Assessment Team[1] will represent both the Council of Europe and MONEYVAL and it is expected to uphold the highest standards of **professionalism, integrity,** respect and conduct themselves in accordance with these core values and with the values that underpin them, namely independence, trustworthiness, responsibility, dignity, diversity and discretion**.** Examples of improper conduct which must be avoided include disrespectful behaviour towards the host country and the interlocutors, as well as towards the MONEYVAL Assessment Team members, indifference and distraction during interviews (e.g. not taking notes, leaving the room, doing other business via electronic devices, ignoring discussions, etc.), raising one's voice during discussions, making intimidating or political statements, not showing a clear commitment to the fight against money laundering/terrorism financing/proliferation financing and to the international rule of law standards over the entirety of the assessment process.

2. Members of the MONEYVAL Assessment Team are expected to apply their **experience and expertise** at all times, including during discussion of the subject matters under evaluation, to analyse the situation and to be able to draft in one of the official languages (English or French). At the same time, the evaluation of a given country is a collaborative effort and the MONEYVAL Assessment Team members are to work in a collegial and cooperative manner.

3. Evaluators should also promptly inform the Secretariat of **personal circumstances that** may affect their ability to carry out their duties (e.g. mobility limitations, accessibility needs), so that appropriate arrangements can be considered.

[1] Council of Europe staff who are members of an assessment team are under the authority of the Secretary General and are bound by the Staff Regulations and the relevant Instructions of the Secretary General.

4. In addition, the Council of Europe upholds certain **fundamental values and principles** such as gender equality, non-discrimination, prohibition of sexual and other forms of harassment and prohibition of ill-treatment of human beings. These should be adhered to at all times by MONEYVAL Assessment Team members.

b. Impartiality, objectivity, neutrality

5. MONEYVAL Assessment Team members should **act in an impartial manner, and be seen doing so, during** the entire evaluation process.

6. MONEYVAL Assessment Team members should assess the information and facts presented to them in the context of an evaluation **objectively, without bias or prejudice, or considerations of a political nature.** MONEYVAL Assessment Team members participate in the evaluations for and on behalf of MONEYVAL and should not accept any **external instruction** (for instance from their employing institution, government or head of delegation) and should not be influenced by considerations which are unrelated to the evaluation (e.g. belonging to the same professional category as the one under evaluation). Any attempt or conduct aimed at influencing the work of the MONEYVAL Assessment Team, including through pressure or intimidation should be promptly reported to the Assessment Team Lead from the MONEYVAL Secretariat.

7. As a general rule, **communication with the country evaluated** takes place through the Secretariat and parallel bilateral contacts with representatives of the country concerned shall be avoided unless the MONEYVAL Evaluation Team has agreed otherwise.

c. Conflicts of interest and incompatibilities

8. When confirming his/her participation, **the expert should disclose any potential conflict of interest[2] or incompatibility[3]** that may affect or be perceived as affecting his/her role as an evaluator for the country concerned. This requirement also applies at any later stage of the evaluation process if a change in circumstances occurs, for example if the expert is offered a consultancy contract by, or in connection with, the country concerned. All such declarations shall be submitted promptly to the Executive Secretary. Consequently, the measures as foreseen under *Section g – Adherence to the principles of conduct* of this document would apply.

d. Personal benefits and gifts

9. **The Council of Europe has a no-gift policy. As a principle, participants in an evaluation cannot seek or accept gifts, favours or advantages of any kind for themselves or others in the performance of their duties with MONEYVAL**. As a rule, all team members are expected to attend all meetings organised during the visit and they will, as a main rule, be accommodated in the same venue so as to facilitate logistical arrangements and interaction within the team. Private matters (meeting friends or relatives, tourism and shopping) should not interfere with the programme and the evaluator's tasks.

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[2] This is to be understood broadly and as referring to any material and other interest of a personal or private nature (including those of spouses / partners and close relatives of the expert), which they may have in relation to the country to be evaluated. Since this is not limited to purely material interests, a conflict may also arise, for instance, from membership in an organisation or club pursuing the objective of developing political / commercial and other relations with the country under evaluation.

[3] For instance, an expert being involved in technical cooperation projects, the negotiation of inter-agency agreements with the country under evaluation, etc.

10. Although it is normal to exchange business cards and contact details, Assessment Team Members are expected to **refrain from promoting actively certain professional, academic and other personal activities**. Seeking consultancy opportunities – whether related or un-related to the subjects discussed during the on-site visit – is incompatible with the evaluation work.

11. When circumstances make it impossible to refuse a gift or advantage (work-related, gifts of a value of less than 50€ or conventional hospitability such as attendance of an official event or meal), they should declare it to the Assessment Team Lead from the MONEYVAL Secretariat who shall inform the Executive Secretary.

e. Confidentiality

12. **Confidentiality must be preserved throughout the entire evaluation process**, before, during and after the on-site visit. This applies to information submitted via the Secretariat, information obtained during the entire evaluation process, information linked to the mutual evaluation process and the various versions of the draft mutual evaluation report. The content of a mutual evaluation report adopted by MONEYVAL can only be referred to in public, once it has been published. The key findings provided by the assessment team to officials of the assessed country at the closing meeting and the draft evaluation reports are confidential.

13. Discussions with governmental/public bodies and representatives of private sector/NGOs, during on-site missions or other meetings, shall remain confidential and MONEYVAL Assessment Team members are bound by confidentiality requirements in relation to any information exchanged pursuant to these interactions.

14. Meetings/exchanges with media should be avoided during the on-site. In exceptional circumstances exchanges with media can take place subject to approval from the host country authorities and Council of Europe management. If a media interview is organised outside working meetings, the Secretariat will respond as necessary to questions concerning general aspects of the visit and MONEYVAL's work.

15. The confidentiality requirement does not apply to documents and information of the assessed country if the originator of the documents consents to their release or if these have been made already public by the assessed country (e.g. legislation).

16. No personal data shall be publicly disclosed, and the Assessment Team members shall abide by Council of Europe data protection requirements, as applicable.

17. The obligations contained in this document are not intended to override or supersede any existing obligations that participants of the assessment process may already be subject to concerning the handling of information or conflicts of interest, as a result of their employment with a national authority or an international organisation.

f. Precautionary measures for missions and engagement

18. The Secretariat shall inform the evaluators, at the beginning of the evaluation process, about any **specific precautions** that may need to be taken in relation to the evaluation, the on-site visit and any other meetings.

19. MONEYVAL Assessment Team members should **remain alert at all times during the process** – including outside of official activities – to avoid any intentional or unintentional actions that could have reputational or other adverse consequences for themselves, MONEYVAL and the Council of Europe. Particular attention should be exercised with respect to potentially illegal activities, politically sensitive situations and any questionable solicitations or offers encountered in the country visited.

g. Adherence to the principles of conduct

20. By confirming their participation in a country evaluation, national experts are deemed to accept, respect and comply with requirements set out in this document in their capacity as MONEYVAL evaluators. Guidance (including on a on matters related to inappropriate conduct) shall be sought from the Executive Secretary at any time, including on a confidential basis.

21. The Executive Secretary, the MONEYVAL Chair and the Head of Delegation, shall be notified of any conduct in breach of the requirements set out in this document by a national expert during the evaluation process.

22. Decisions regarding the possible removal of a MONEYVAL Assessment Team member on the grounds of conflict of interest/incompatibilities or breaches of ethical standards as prescribed in this document shall be made by the Executive Secretary in consultation with the Bureau.

h. Guidance and support

23. Throughout the evaluation process, the MONEYVAL Secretariat permanently provides guidance and support to the Assessment Team and each of its members. Proper liaison between all the parties involved in the process is a key factor for the evaluation to run smoothly. Whenever an assessor has a question on issues related to the afore-mentioned principles, rules and procedures or to the mutual evaluation process, they should raise the matter with the Secretariat.

24. The Secretariat will endeavour to provide all the necessary guidance and support. This guidance may include, but is not limited to, the interpretation of the principles, rules and procedures elaborated under paragraphs 1-22 of this document; interpretation of the FATF Standards/Methodology; provision of good practice examples and past decisions by MONEYVAL/FATF; interpretation of any horizontal issue with regard to particular Recommendations/Immediate Outcomes, and other matters.