Berlin Global Village

Code of Conduct and Complaint Mechanisms

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Introduction

Berlin Global Village (BGV) is a place in Berlin where people, initiatives and associations work towards social change and global justice. Berlin Global Village is a place of diversity, encounters, cooperation, open dialogue and engagement, through which we seek to make a positive contribution to society together. Transparency and fairness are essential values for participation and cooperation that do not exclude people and are as inclusive as possible.

Purpose

The BGV Code of Conduct and Complaint Mechanisms enable the development and maintenance of respectful, responsible and supportive relationships. These structures provide a framework for:

- How the centre offers support and intervenes to resolve conflicts in cases of discrimination and other disputes (Sections 1–2).
- Preventing conflicts of interest and taking measures to prevent corruption (Section 3).

This Code of Conduct is to be reviewed by the Shareholders every two years and amended where necessary.

1. Anti-Discrimination Code of Conduct

Where feasible, BGV aims to find constructive solutions that work for everyone involved once it has been informed of an incident.

1.1 Personal and Material Scope

1.1.1 Personal Scope

This Code of Conduct applies to all volunteers and paid staff, freelance and permanent, of Berlin Global Village gGmbH (BGV), as well as members of its governing bodies (the Shareholders and Tenants' Representation) and BGV tenants. Tenants, in turn, pass on the obligations and rights under this Code of Conduct to their volunteers and staff, who may also invoke the Anti-Discrimination Code directly. All these people are collectively referred to as members of the center.

1.1.2 Material Scope

This Anti-Discrimination Code concerns breaches of our values in a professional context involving BGV—including tenancy-related contexts—or in a professional context involving BGV's tenant organizations. This scope may also include the use of social media.

1.2 The Scope of our Values

1.2.1 Values

Berlin Global Village (BGV) is committed to creating an inclusive environment for everyone, regardless in particular of skin color, ethnicity, religion, national origin, language, citizenship, age, physical or mental disability, sexual orientation, gender identity or expression, parental status, pregnancy status, marital status, political affiliation, mental health status, socioeconomic status or background, neurotype, or physical appearance. This includes both actual and perceived identity.

This Code of Conduct expresses our responsibility towards and respect for one another. See also the glossary at the end of this document.

1.2.2 No Discrimination, Abuse of Power, Harassment (Including Sexual Harassment), or Bullying

We reject all forms of discrimination and harassment and will work continuously to address the effects of discrimination in our organizations. Unjustified discrimination and harassment, bullying, threatening behavior and abuse of power violate the BGV Code of Conduct and are prohibited.

Microaggressions are among the most common forms of discrimination. As BGV is a global center bringing together diverse experiences, we recognize that not everyone has the same information or awareness of prejudice, structural discrimination and mechanisms of

exclusion. There are many reasons why behavior may be perceived, consciously or unconsciously, as crossing boundaries or being discriminatory.

BGV recognizes this complexity. Social inclusion involves dealing with mistakes collectively and individually, being willing to act transparently, taking responsibility, avoiding mistakes wherever possible, and learning from mistakes when they do occur.

1.2.3 Preventative Measures

BGV provides regular anti-discrimination training for its freelance and permanent staff and supports tenant organizations by providing a list of pre-vetted, high-quality providers of anti-discrimination training and resources.

Tenant organizations are expected to work towards decolonizing their organizations, developing an understanding of intersectionality, and identifying the many ways in which racism in particular contributes to the further marginalization of our communities.

2. Complaint Mechanisms

Three points of contact are available for violations of the Anti-Discrimination Code of Conduct:

- The ombudspersons, who are bound by confidentiality, including in relation to BGV management.
- BGV Managing Director, which acts both as a general point of contact and as the complaints office under the General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz, AGG).
- An external point of contact, a specialized law firm, which may be consulted in specified circumstances by either the ombudspersons or BGV management.

Regardless of this Code, anyone who experiences discrimination has the right to contact external advisory services, law-enforcement authorities, regulatory authorities or a lawyer, even if steps are also taken under this Code.

Right to Submit a Complaint

BGV encourages members of the center to report all incidents that violate this Anti-Discrimination Code. Reports may also be made anonymously.

Confidentiality

Confidentiality within BGV is a central part of the process. This principle may be limited where disclosure is necessary to clarify and resolve an incident; the personal rights of those involved must nevertheless be respected.

Confidentiality continues to apply to people who are not involved in the incident or its review. This is particularly important to prevent rumors or unverified information from negatively affecting the process.

2.1 Ombudspersons

The BGV ombudspersons work confidentially to create a protected space where members of the center can discuss a problem or concern, explore possible ways to resolve a conflict, and bring systemic concerns to the organization for resolution.

Management provides structural support for their work, but they operate informally and independently of formal organizational structures. The ombudspersons are nominated, among others, by the MSO Anti-Racism Council and may only be staff members of organizations that rent space at the center.

They are appointed by the BGV Shareholders for two years at a time. They may serve multiple terms. Staff and tenant organizations at the center must be informed promptly whenever an ombudsperson changes.

2.1.1 Initial Consultation and Competence of the Ombuds Roll

Ombudspersons maintain the confidentiality of people seeking support, including vis-à-vis BGV management, and are there to support those affected.

Ombudspersons:

- Listen to concerns and help clarify or reframe them, identify possible options, and support the person in deciding which option to pursue.
- At the request of the person concerned, refer them to appropriate resources or points of contact to help resolve the problem.

Ombudspersons do not resolve problems themselves. Rather, they provide guidance on which body may be best placed to help resolve the issue.

The ombuds service is not a formal decision-making body. Ombudspersons therefore have no decision-making authority and cannot themselves initiate measures or sanctions.

2.1.2 Confidentiality and Documentation Obligations

BGV ombudspersons work with a high degree of independence in order to avoid conflicts of interest. They are bound by strict confidentiality, including in relation to management.

They provide general annual reports containing anonymized data on the total number of cases, trends, types of cases and outcomes, in order to inform management about systemic issues.

2.2 BGV Management as the General Point of Contact for Violations of the Anti-Discrimination Code

Like the ombudspersons, the assigned BGV Managing Director may be contacted regarding a possible violation of the Anti-Discrimination Code. Management is committed to creating an open, supportive and confidential environment in which members of the center can raise concerns.

2.2.1 Review and Determination of a Violation

The Managing Director is responsible for conducting thorough and impartial investigations into all complaints and is authorized to determine whether the Anti-Discrimination Code has been violated.

2.2.2 Selection of Measures

Management selects the measures to be taken.

In cases of violations of the Anti-Discrimination Code, measures or sanctions may be recommended or imposed. Mediation, further education or training may also be recommended or required, with the aim of eliminating discrimination and promoting a respectful working environment.

Where appropriate for clarifying the incident, management develops these measures together with the people involved in order to find a constructive solution wherever possible.

2.3 BGV Managing Director as the AGG Complaints Office

BGV management also acts as the complaints office under Section 13 of the General Equal Treatment Act (AGG)

2.3.1 Right to Submit a Complaint

Employees and other persons entitled to do so under the AGG may contact the AGG complaints office if they believe they have personally experienced discrimination covered by the General Equal Treatment Act. Complaints may also be submitted anonymously where legally permissible.

2.3.2 Initial Consultation

The people concerned are informed about the procedure, the available options for resolving the matter and the implications of the AGG. They are given a clear overview of possible next steps.

2.3.3 Review and Determination of a Violation

In every case, the procedure follows the statutory requirements of the AGG. The rights of the people concerned are respected, and statutory deadlines and obligations are observed.

Management carefully assesses every complaint and gathers relevant information to understand the situation fully.

2.3.4 Documentation Obligations

All interactions, including complaints, conversations and mediation processes, are documented. Management keeps accurate records to ensure that the facts can be established comprehensively.

2.4 External Complaints: Law Firm

Some situations require an external complaints office. If BGV management is involved in the incident that gave rise to a complaint, or lacks the necessary legal expertise, members of the centre need an alternative source of support.

In such cases, an external BGV partner with legal training and expertise may serve as a point of contact.

2.4.1 Right to Submit a Complaint

The specialised law firm may be contacted either through a referral by BGV management or through a BGV ombudsperson.

Because the use of these services is limited for cost reasons, this option is available only in certain cases and must be approved through an internal process.

2.4.2 Review, Determination of a Violation and Measures

The external point of contact may document the facts, determine whether discrimination has legal relevance, and suggest possible measures.

2.4.3 Supervision and Training of Points of Contact

Appropriate supervision for management and the ombudspersons creates a balance between independence and accountability, high-level oversight, ethical guidelines and regular reviews.

Supervision ensures that the ombudspersons' remit is clear, allowing them to mediate, review or advise without intervening in formal disciplinary measures or other procedures that could compromise their role.

Annual reviews are carried out to ensure that management and the ombudspersons work effectively. These reviews focus more on processes, integrity and compliance with good practice than on the outcomes of individual cases.

To address development needs, the internal point of contact and the ombudspersons have access to training and resources that keep them up to date on laws, strategies and good practice in anti-discrimination.

3. Anti-Corruption Code of Conduct

3.1 Scope

3.1.1 Definitions

Corruption is the abuse of entrusted power for private gain or advantage (definition by Transparency International).

Corruption can take various forms, such as offering, giving, requesting or accepting a benefit for oneself or a related person or organization as an inducement to do something in the course of ordinary business that is dishonest, illegal or a breach of trust.

A conflict of interest exists where a person's own interests, or those of a related person or organization, could potentially lead them to make decisions that are not exclusively in the interests of Berlin Global Village.

This Code therefore covers a broad range of conduct that lacks integrity. However, it cannot address every relevant situation or provide examples for all cases, as the boundaries are fluid. In many cases, the people concerned will need to make independent decisions to preserve their integrity and prevent and combat corruption.

3.1.2 Protection Against Retaliation and Whistleblower Protection

Our anti-retaliation and whistleblower protections apply to BGV employees, members of the centre and other people who:

- Submit, or intend to submit, a complaint concerning a policy contained in this Code of Conduct.
- Submit, or intend to submit, a complaint concerning accounting, internal accounting controls or auditing matters that could result in inaccurate or false financial records.
- Report a violation that endangers the health or safety of BGV employees, members of the centre or the general public.
- Provide information to assist an investigation into violations of these policies.
- File a report, testify, participate in or assist with proceedings, a lawsuit or a hearing relating to alleged violations of the law.

Retaliation against anyone for participating in a procedure under this Code of Conduct, or for associating with someone who has filed a complaint or participated in such a procedure, is treated as harassment and will not be tolerated.

For action to be taken, every incident of retaliation must be reported to BGV by the person affected or a witness. If retaliation is suspected, all facts about the incident and the names of the people involved must be reported.

3.2 Values (Principles)

3.2.1 Protection Against Corruption

The right of people to be protected from corrupt practices and their effects is affirmed and respected. This protection applies regardless of gender, physical or mental disability, skin colour, age, sexual orientation, religion, worldview, culture, education, social status or citizenship.

3.2.2 Transparency and Accountability

The greatest possible transparency is maintained regarding decision-making processes, the planned and actual use of resources, strategic objectives and their implementation. This also means that Berlin Global Village gGmbH must report comprehensively on the use of funds and arrange for timely independent audits.

3.2.3 Participation and Loyalty

Employees must be appropriately involved in decision-making processes within the scope of their responsibilities and duties. All employees and fee-based contractors must act loyally towards the aims and interests of Berlin Global Village. This includes constructive criticism, which should be raised in an appropriate manner.

Conversely, when allegations concern employees, they may expect their employer to examine, assess and analyse them carefully in order to protect them. Abuse of this process must be ruled out.

3.2.4 Confidentiality and the Duty to Report Corruption

Sensitive data and information entrusted to people must be handled confidentially, and personal data must be protected. Nevertheless, all employees have the right to refuse to be drawn against their will into activities suspected of being corrupt. They have both the right and the duty to report any corrupt act they witness or experience. Reports must be made to one of the two ombudspersons.

3.3 Approach (Existing Instruments)

3.3.1 Organisational Culture

In its founding visions, Berlin Global Village, its governing bodies and its tenants commit to a shared vision and establish guiding principles for their conduct. Overall, the organisation fosters an atmosphere shaped by high ethical standards and enables relationships based on trust and constructive self-criticism.

3.3.2 Internal Policies

Internal policies govern the award of contracts, signing authority and investments. They establish the two-person approval principle and thereby help minimize the risk of decisions that would disadvantage BGV gGmbH.

3.3.3 Disclosure of Roles and Mandates

Members of BGV bodies (excluding the BGV Advisory Board) and the management of the gGmbH disclose their involvement in companies or other private- or public-sector organizations. This information is updated annually and made available to the Shareholders. In addition, members must disclose any conflict of interest in an individual case and subsequently refrain from participating in the relevant decision-making vote.

3.3.4 External Audits

Berlin Global Village promotes quality assurance in its work and projects and commits to internal and external quality and oversight. Regular external audits, for example by an auditor or the tax office, help make compliance with internal rules and legal requirements transparent.

3.3.5 Additional Rules of Conduct

All persons covered by the Anti-Corruption Code (see above) undertake to:

- Avoid or disclose conflicts between personal interests and the interests of Berlin Global Village, as well as conflicts between the interests of Berlin Global Village and its partners.
- Not use their work for Berlin Global Village to pursue personal interests that are inconsistent with BGV's interests.
- Not jeopardize BGV's reputation by associating it with people or organizations whose activities are incompatible with BGV's values.
- Not solicit gifts, hospitality or benefits in connection with their work for BGV, and accept them only when their reason, nature and value are appropriate to the occasion and cannot be misunderstood by the parties involved or by third parties. This is presumed where the value is below €40 per year. If there is doubt about appropriateness, management or the Shareholders decide.

The following also applies:

- Conflicts of interest in procurement: Where a conflict of interest exists, the person concerned may not participate in the relevant procurement procedure. A conflict of interest exists for people involved in carrying out a procurement procedure or able to influence its outcome who have a direct or indirect financial, economic or personal interest that could compromise their impartiality and independence in that procedure. A conflict of interest is also presumed for people whose relatives meet these conditions. Relatives include a fiancé(e), spouse, life partner, lineal relatives and relatives by marriage, siblings, nieces and nephews, siblings' spouses and life partners, siblings of spouses and life partners, siblings of parents, and foster parents and foster children.
- Employment and commissioning of relatives: Employing relatives is not permitted. Relatives may be commissioned only up to a maximum of €600 per individual contract or €6,000 per year for multiple contracts.

- Relatives in supervisory positions: Relatives of gGmbH employees may not serve in supervisory positions within the gGmbH. They may serve on voluntary committees. Before they begin, the family relationship must be disclosed to the Shareholders and BGV gGmbH management.

3.4 Complaint Mechanisms

3.4.1 Procedure

Anyone who believes that corruption is threatened or has already occurred at Berlin Global Village may contact the ombudspersons. BGV gGmbH management will investigate any conduct that comes to its attention through the ombudspersons and that violates this Code of Conduct and will take appropriate sanctions.

If allegations concern the work of BGV gGmbH management, the shareholders of BGV gGmbH will be involved. If allegations concern the work of the BGV gGmbH Sharehlders, the BGV Tenants' Representation will be involved. BGV gGmbH will always conduct an internal clarification process and hear the person concerned before making a public statement about an allegation.

This Code of Conduct will form part of employment, fee-based service or cooperation agreements. For existing agreements, the contractual partners' signatures will be obtained; for new agreements, this Code will be taken into account during negotiations.

3.4.2 Sanctions

If these rules are violated, BGV gGmbH will assess which measures should be taken against the person responsible. These may include warnings, termination of employment or contracts, and claims for damages. If there is evidence of criminal conduct, law-enforcement authorities will be informed.

No sanctions will be imposed on someone who has merely provided relevant information to help uncover incidents. If that person was involved in the conduct, their report will be taken into account positively when sanctions are determined.

No one who has been wrongfully accused may have their work for Berlin Global Village restricted or their reputation damaged.

Glossary

DISCRIMINATION	Discrimination is the systematic disadvantaging, devaluation or exclusion of people or groups on the basis of socially constructed characteristics such as origin, gender, skin color, disability, religion, sexual orientation or social status. This disadvantage is produced through visible and invisible structures, rules, laws, norms, language and behaviors that have developed historically and are maintained through power relations. • **Discrimination is not only individual misconduct**; it is deeply embedded in social systems. • **Intent is not required**: even unintentional behavior or seemingly "neutral" rules can have discriminatory effects. • **The perspectives of those affected are central.** People who experience discrimination have an important say in determining what is discriminatory—not the person or institution responsible for it. • **Multiple forms of discrimination can overlap.** Different forms, such as racism, sexism and ableism, often interact and reinforce one another.
SAFETY	BGV places great importance on the safety and well-being of our employees, members of the center and guests. We are committed to creating a safe environment for everyone and to distinguishing safety from discomfort. This commitment requires everyone to share responsibility for creating and maintaining safe conditions. Safety means being free from physical harm, danger or threats. It includes both physical and psychological protection from injury, violence or hazards. Ensuring safety means preventing harm, accidents and health risks. Discomfort refers to a state of unease, awkwardness or mild distress. It is not necessarily associated with danger or harm, but concerns emotional, mental or physical feelings that are unpleasant without being unsafe. Discomfort often leads to growth, self-awareness or adaptation. It may arise in challenging but non-threatening situations.

BULLYING	Bullying can be defined as repeated verbal, psychological or physical aggression by an individual or group against others. It is behaviour intended to intimidate or cause distress and includes, but is not limited to: • Unwanted sexual or physical contact. • Cyberbullying. • Physical abuse or threats of violence. • Verbal abuse. • Destruction, defacement or theft of personal property. • Participation in activities that intimidate or threaten others or cause extreme emotional distress. • Forcing someone to perform an activity or task that violates the law.
HARASSMENT	Harassment is an attempt by one person to exercise abusive and unwanted power over another person.
SEXUAL HARASSMENT	For the purposes of this policy, sexual harassment is defined as knowingly unwanted sexual advances. Sexual harassment also includes other verbal or physical conduct of a sexual nature where that conduct explicitly or implicitly creates an intimidating, hostile or offensive environment. Such conduct includes, but is not limited to: • Requests for sexual favours in exchange for preferential treatment. • Verbal conduct such as derogatory or obscene remarks, sexual invitations, sexual or derogatory jokes, suggestions, suggestive remarks, insulting comments, obscene remarks or gestures, or other verbal abuse of a sexual nature. • Visual material such as derogatory or offensive posters, photographs, caricatures, drawings or gestures. • Insulting, offensive or obscene comments, gestures or messages. • Threats or retaliation following a negative response to sexual advances.