

FSR Rules of Practice

to preserve the independence and prevent or manage possible conflicts of interest, including situations in which such conflicts may be even only perceived.

- 1. Relationship with Donors (entities such as public institutions, companies, foundations and associations, collaborating with the FSR systematically by providing financial support, information and experience)**
 - 1.1. The FSR shall aim to have numerous enough donors, from different areas of the industry, so that no individual donor is in condition significantly to affect and possibly steer the conduct of the FSR to its own advantage. It should always be a concern of the FSR to look for different views regarding any issue.
 - 1.2. In managing the relationship with its donors, the FSR promotes the values of the European University Institute. The FSR pays particular attention to possible activities which result in obstructing the diffusion of scientific results, even if they are adopted to prevent possible damage to the donor's interests.
 - 1.3. The "rules of engagement" in the reciprocal commitment between the FSR and its donors shall be made explicit, possibly on the donors' page of the FSR website, and donors shall be asked to subscribe to them.
 - 1.4. The FSR staff in positions of responsibility should be solid personalities, able to elaborate and defend independent opinions. They should carefully listen to a variety of views without being easily influenced by them. They should be apt to identify the biases inherent in the preferences of all interested parties, including the FSR donors.
- 2. Research contracts**
 - 2.1 A research study may be proposed by one or more donors or other stakeholders to the FSR. The research contract shall be stipulated and implemented in a way that is consistent with the independence of the FSR.
 - 2.2 A research contract shall therefore be subject to the following conditions.
 - a. The sole contractual basis for the content of the research study is a document titled "Terms of Reference" (ToR) containing a detailed description of the issues to be addressed.
 - b. The research reports shall be signed by their authors. The authors shall be solely responsible for the content of the study, while the FSR shall be responsible for the quality and independence of the study. At its own discretion, the FSR might consult or engage the commissioning party and/or other stakeholders.
 - c. The commissioning party shall acknowledge that the authors and the FSR have the widest possible discretion on how to conduct the study, in accordance with the ToR, and in no way the commissioning party may condition the results of the study, beyond its purpose as defined in the ToR.
 - d. The research reports, together with the ToR, shall be published by the FSR. They are accompanied by an acknowledgment of the commissioning of the study by the

commissioning party. Publication will not include data or other information which, because of their nature, should be considered as confidential. In any event, no part of the study is reserved to the commissioning party.

- e. The intellectual property right on the results of the study shall be vested in the FSR and the authors.
- f. The “terms of engagement”, reflecting the terms under which the FSR conducts its research, shall be included in all research contracts, unless a derogation is granted by the Director, having consulted the Ethics Adviser.

2.3 Internally, quality control shall be assured, so that the research meets the highest standards of academic excellence and impartiality of judgment. The research reports shall be reviewed, before finalisation, by an internal or external expert who is not a member of the research team.

3. **Workshops and other similar events**

3.1 Selection of the themes and speakers for the workshops or other similar events of the FSR shall be based on continuous contacts with regulators and other institutions, with the academic world, with stakeholders in general and particularly with donors. However, the final decisions on the themes shall be an exclusive responsibility of the FSR.

3.2 As a general rule, the FSR shall not co-organise events with other parties, except in the case of EU institutions and bodies, international accredited bodies and institutional organisations (IEA, IRENA, ...), regional associations of regulatory authorities, highly reputable independent universities, research institutes and philanthropic foundations, or international associations of academics (e.g. IAEE, EAERE).

3.3 Any different proposal for the co-organisation of an event may be submitted to the Director, who may authorise it after consulting the Ethics Adviser, taking into account the interest of the FSR and the potential conflict-of-interest risk.

3.4 Unless a workshop or other similar event is co-organised with other entities, the planning and the organisation of the event, including the selection of invited speakers, experts and participants, shall be the exclusive responsibility of the FSR. In case of co-organised events, the planning, organisation, and selection of speakers, experts and participants shall be coordinated with the co-organising entities, and the FSR shall ensure that appropriate standards of independence, neutrality and inclusiveness be respected.

3.5 In setting the agenda and in choosing the speakers and discussants for workshops and other similar events, the FSR shall take care that different points of view are represented in a balanced way.

3.6 All donors shall be invited to all workshops of the Regulatory Policy Workshop Series and be given a possibility to express their views, except in cases when the available time makes this impossible.

3.7 All donors of the same donorship tier participating in an event shall be treated equally.

3.8 The opinions of donors participating in an event shall be qualified as such and not as representing the view of the FSR.

3.9 Unless the workshop or other online event is open to online participation, broadcasted or recorded for subsequent publication, participants shall be free to use the information received, but not to reveal the identity or the affiliation of its author (Chatham House Rule), unless a speaker has provided a presentation and authorised its dissemination. In this case,

participants shall be informed of the Rule at the beginning of the event.

- 3.10 Participants may be asked to express their evaluation of the workshop at the end of it, as a contribution to continuous improvement.

4. Training

- 4.1 The FSR shall not co-organise training with other parties, except in the case of co-organisation with other academic establishments, regional associations of regulatory authorities, EU institutions and bodies or international accredited bodies and institutional organisations (IEA, IRENA, ...). In some cases, special training can be organised for specific groups of participants, occasionally in cooperation with public institutions.. Training can be exceptionally co-organised with other entities, subject to prior authorisation by the Director, having consulted the Ethics Adviser. In all cases, the training shall meet the highest standards of independence.
- 4.2 Private sponsors and foundations are welcome to support FSR's training activities, and their support shall, as a general rule, be in the form of scholarships, covering the course fees. They can also engage FSR for tailor made training.
- 4.3 The content of any course shall be aligned to the best international practices. It shall be oriented to promote clean technologies and energy efficiency, and to cultivate concern for climate change and universal access to modern energy.
- 4.4 Trainers shall be selected so that the intellectual honesty and neutrality of the teaching is preserved. Therefore, trainers shall not be representative of private or other specific interests in the energy sector. However, one of the FSR's unique characteristics is to bring together academic rigour and practical experience. Therefore, the involvement of industry stakeholders is encouraged through testimonials and panel discussions, where it is made clear that the views presented are those of the stakeholders and balance is maintained between the different views.
- 4.5 In the case of training initiatives co-organised with other entities, the FSR shall ensure that the organisation of the course and the selection of trainers adhere to the standards outlined above.
- 4.6 Cases where compliance with the standards outlined above is not evident are submitted to the Director, who decides having consulted the Ethics Adviser.
- 4.7 Any personal views of individual lecturers and any expression of the intellectual position shared by the FSR community shall be clearly presented as such.
- 4.8 Participants are asked to express their evaluation of the course at the end of it, and to "grade" the instructors. Each instructor is informed of her/his evaluation, compared with the average of all instructors of the course.

5. Transparency and compatibilities

- 5.1 The FSR accounts are included in the general reporting of the Robert Schuman Centre, which is itself part of the European University Institute. Specific FSR accounts, however, shall be compiled, so that donors may know the destination of their donations. These accounts shall be published.
- 5.2 The list the FSR donors shall be made public, identified by tier (on the basis of level of contribution).
- 5.3 Recruiting of senior and junior staff and of part-time staff (professors, advisors, fellows) shall

meet the requirements of sound scientific background, high professional competence and undisputed ethical standards, generally following the procedures of the European University Institute. Short CVs of staff members, part- time professors and advisors shall be published.

- 5.4 In order to make sure that external activities performed by FSR academics are not in conflict or in competition with activities performed by the FSR, all FSR members (except those performing non-academic duties) shall complete, at the beginning of each year and, in any case, every time circumstances change, a Declaration of Interests (DoI) using the form provided in Annex 1. The DoIs shall be published in the personal pages on the FSR website.
- 5.5 The DoIs are reviewed by a Review Panel composed by the Director, the Deputy Director(s) and the Ethic Adviser. The DoI of each Panel member is reviewed in his/her absence; in this case, the Review Panel is integrated by the longest-serving part-time professor at the FSR, acting as alternate member. On the basis of his/her DoI, each member is assigned to one of the following risk categories
- No risk – there is no interest declared in the areas of activities of the FSR or which could otherwise affect the independence of the member in his/her FSR-related activities;
 - Low risk – the interests declared are in the areas of activities of the FSR, but they are not considered to affect the actual or perceived independence of the member in his/her FSR- related activities;
 - High risk – the interests declared are in the areas of activities of the FSR and/or are likely to affect, or be perceived to affect the independence of the member in some of his/her FSR- related activities.
- 5.6 Each FSR member is informed of the outcome of the review of his/her DoI. Where a high risk is detected, the member is consulted on how best to mitigate it before the Director, on the proposal of the Review Panel, take any necessary decision such as limiting the involvement of the member in some areas of activities of the FSR.