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Circular Letter No.4908  
20 August 2024

To: IMO Member States and Associate Members  
IMO non-Members Party to IMO treaties  
United Nations and specialized agencies  
Intergovernmental organizations  
Non-governmental organizations in consultative status with IMO

Subject: **Code of Conduct for Delegates, Observers and Other Participants at IMO Meetings, Events and Activities to Prevent Harassment including Sexual Harassment**

1 The Council, at its 132nd session, adopted the Code of Conduct for Delegates, Observers and Other Participants at IMO Meetings, Events and Activities to Prevent Harassment including Sexual Harassment (hereafter referred to as the Code of Conduct). The Code of Conduct can be found in the annex to this Circular Letter.

2 To publicize the Code of Conduct, a reference, and link to the Code of Conduct will be added to:

- .1 all invitations to IMO organ meetings, events and any other forums organized, hosted or sponsored in whole or part by IMO;
- .2 opening briefs or statements introducing administrative arrangements for such a meeting or event;
- .3 the meeting room, hire, facilities and services contract and delegates lounge or cafeteria catering contracts for external events, with the organizers being requested to assure that all participants or guests receive a copy of the Code of Conduct;
- .4 all contracts with individual consultants or companies, with the contractor assuring that all employees or sub-contractors receive a copy of the Code of Conduct; and
- .5 all introductory briefings on administrative matters at the beginning of technical cooperation activities organized or co-organized by IMO.

3 In addition, QR codes linking to the Code of Conduct are displayed at IMO Headquarters, and the Code of Conduct has been published on the IMO website.

4 With regard to any consultations concerning the Code of Conduct and the complaint procedure as specified in paragraph 10 of the Code of Conduct, the Secretary-General has designated the Head, Internal Oversight and Ethics Office (IOEO), as a confidante within the Secretariat for delegates or other participants at IMO meetings, events or activities.

5 Delegates and any participants at IMO meetings, events or activities, can contact the Head, IOEO by sending an email to: [ethics@imo.org](mailto:ethics@imo.org).

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## ANNEX

### CODE OF CONDUCT FOR DELEGATES, OBSERVERS AND OTHER PARTICIPANTS AT IMO MEETINGS, EVENTS AND ACTIVITIES TO PREVENT HARASSMENT INCLUDING SEXUAL HARASSMENT

#### 1 Purpose

1 IMO is committed to enabling events at which everyone can participate in an inclusive, respectful and safe environment. IMO events are guided by the highest ethical and professional standards, and all participants are expected to behave with integrity and respect towards all attending or involved with any IMO event.

2 The United Nations developed a model Code of Conduct which has been adapted herein for use by IMO.

#### 2 Applicability

3 The Code of Conduct applies to any IMO event, to include meetings, conferences and symposia, assemblies, receptions, scientific and technical events, expert meetings, trainings, workshops, exhibits, side events and any other forum organized, hosted or sponsored in whole or part by IMO wherever it takes place, and any event or gathering that takes place on IMO premises whether or not IMO is organizing, hosting or sponsoring.

4 The Code of Conduct applies to all participants at IMO events, including all persons attending or involved in any capacity, whether registered, accredited or otherwise. It applies throughout the event, inclusive of mornings, evenings, transit and offsite conduct.

5 The Code of Conduct supplements, and does not replace, the relevant policies, regulations, rules and laws, including laws regulating the premises in which the IMO event takes place and any applicable host country agreements.

#### 3 Prohibited conduct

6 Harassment is any improper or unwelcome conduct that might reasonably be expected or is reasonably perceived to cause offence or humiliation to another person. Harassment in any form because of gender, gender identity and expression, sexual orientation, physical ability, physical appearance, marital or family status, ethnicity, race, national origin, political affiliation, age, religion or any other reason is prohibited at IMO events.

7 Harassment includes physical or verbal abuse directed at participants, including members of the IMO Secretariat, at IMO events. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment.

8 Sexual harassment is a specific type of prohibited conduct. Sexual harassment is any unwelcome conduct of a sexual nature that might reasonably be expected or is reasonably perceived to cause offence or humiliation. Sexual harassment may involve any conduct of a verbal, non-verbal, or physical nature, including written and electronic communications, and may occur between persons of the same or different genders.

**9 Examples of sexual harassment include, but are not limited to:**

- making derogatory or demeaning comments about someone's sexual orientation or gender identity;
- name-calling or using slurs with a gender/sexual connotation;
- making unwelcome sexual comments about appearance, clothing, or body parts; repeatedly asking a person for dates or asking for sex;
- unwelcome touching, including pinching, patting, rubbing, or purposefully brushing up against a person;
- making inappropriate sexual gestures, as well as prolonged, unwelcome staring;
- sharing unwelcome offensive anecdotes or jokes;
- sending sexually explicit communications in any format;
- sharing or displaying sexually inappropriate images or videos; and
- attempted or actual sexual assault, including rape.

**4 Complaint process**

10 A participant who feels that they have been subjected to or witnessed any form of harassment at an IMO event may report the matter either to the organizer of the event, a member of the IMO Secretariat, or to the relevant security authority. Such reporting shall have no effect on the applicable rules and procedures that apply to IMO and its personnel. The organizer of the event and/or IMO will be expected to take appropriate action in accordance with its applicable policies, regulations, and rules. The organizer shall maintain the confidentiality of all communications received reporting harassment.

**11 If the accused perpetrator is IMO personnel:**

- .1 IMO will address the report in accordance with its policies, regulations and rules, including, where applicable, the IMO policies on prohibited conduct.
- .2 If IMO conducts an investigation into the alleged conduct, the Secretary-General or the Head of the Internal Oversight and Ethics Office will notify the complainant of the determination at the conclusion of the investigation.

**12 If the accused perpetrator is not an IMO personnel, examples of appropriate action may include, but are not limited to:**

- requesting the accused perpetrator to stop the offending behaviour immediately;
- suspending the accused perpetrator's access to the IMO event, refusing registration at future IMO events, or both;

- conveying the complaint to any investigative or disciplinary authority with jurisdiction over the person accused; and
- conveying a report to the employer or entity with jurisdiction over the person accused of harassment for appropriate follow-up action, including national authorities where appropriate.

13 The victim of the alleged harassment may also seek help from other relevant authorities, such as the police, bearing in mind the applicable legal framework.

## **5 Prohibition of retaliation**

14 Threats, intimidation or any other form of retaliation against a participant who has made a complaint or provided information in support of a complaint are prohibited. IMO or any other entity responsible for an IMO event will take any reasonable appropriate action needed to prevent and respond to retaliation, in accordance with its applicable policy, regulations and rules.

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