



hdri
Human Development
Research Initiative

POLITICAL NEUTRALITY & ELECTORAL PERIOD CONDUCT POLICY

Protecting HDRI's Independence in Ordinary Times and During Elections

Adopted by the Board of Directors pursuant to Article 31 of the HDRI Statutes

Paris, France



Human Development Research Initiative (HDRI)

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Registration Number: W751275674

EU TRN: 892689452279-12

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PREAMBLE

The Human Development Research Initiative ('HDRI' or 'the Organisation') conducts research and advocacy on subjects, migration, gender equity, economic and social rights, environmental policy, and global health, that sit close to the centre of political life in every country in which HDRI is active. That proximity makes political independence not a peripheral virtue but a precondition for HDRI's credibility. A policy research organisation that is seen, rightly or wrongly, to favour a party or a candidate loses the very thing that gives its research its value: the presumption that its conclusions follow the evidence rather than a political allegiance. This Political Neutrality and Electoral Period Conduct Policy (the 'Policy') exists to protect that independence, in ordinary times and with particular rigour during election periods.

This Policy is adopted by the Board of Directors pursuant to Article 31 of HDRI's Statutes (the 'Statutes'), and gives detailed and operational effect to the political independence already guaranteed by Article 5 of the Statutes, which provides that HDRI shall not be affiliated with any political party, religious organisation, or commercial enterprise, and to Article 7 of HDRI's Code of Conduct. It is drafted with regard to the standards generally expected of organisations entered on the European Union's Transparency Register, of which HDRI is a member, and of civil society partners of the Council of Europe's European Youth Foundation, the European Commission, and Erasmus+, all of which condition their support on an applicant's genuine non-partisanship.

This Policy distinguishes carefully between two things that are easily and dangerously confused: HDRI's issue-based advocacy, which is central to its mission and which this Policy fully protects, and partisan political activity, which this Policy prohibits. Advocating that governments do more to protect refugees, close a gender pay gap, or meet a climate commitment is exactly what HDRI exists to do. Endorsing the party or candidate that promises to do so is not, and this Policy exists to keep that line clear for everyone acting in HDRI's name.

This is the final and consolidated version of this Policy and supersedes any prior draft or informal statement of HDRI's approach to political neutrality.

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TITLE I — GENERAL PROVISIONS

Article 1 — Purpose and Legal Basis

This Policy is adopted pursuant to Article 31 of the Statutes for the purpose of setting out HDRI's institutional political neutrality, the distinction between issue-based advocacy and partisan activity, and the specific conduct required of the Organisation and of Covered Persons during electoral periods.

Article 2 — Definitions

For the purposes of this Policy: '**partisan activity**' means any statement, action, or use of resources that supports or opposes a specific political party, candidate, or slate of candidates in an election, as distinct from a position on a policy issue; '**institutional capacity**' means acting, speaking, or publishing in HDRI's name or using HDRI's platforms, resources, or affiliation; '**personal capacity**' means a Covered Person's private conduct, undertaken on their own account and without invoking or relying on their connection to HDRI; '**electoral period**' means the period defined in Article 9 during which enhanced conduct standards under Title III apply.

Article 3 — Scope of Application

This Policy applies to HDRI as an institution and to every Board member, staff member, intern, research fellow, volunteer, and spokesperson acting in HDRI's institutional capacity, in every country in which HDRI is active. It does not restrict a Covered Person's personal political rights exercised in a genuinely personal capacity, subject to Article 6.

Article 4 — Relationship with the Statutes and the Code of Conduct

This Policy elaborates Article 5 of the Statutes and Article 7 of the Code of Conduct. A breach of this Policy is a breach of the Code of Conduct and is addressed under the procedures set out in Articles 26 to 30 of the Code of Conduct.

TITLE II — PRINCIPLES OF POLITICAL NEUTRALITY

Article 5 — Institutional Non-Affiliation

HDRI, in its institutional capacity, shall not be affiliated with, financially support, or receive financial support from any political party, and shall not act as an instrument of any political party's platform, in accordance with Article 5 of the Statutes.

Article 6 — Distinction Between Institutional and Personal Political Expression



A Covered Person retains, in a genuinely personal capacity, the ordinary political rights of any citizen, including the right to join a political party, campaign for a candidate, or stand for public office. Where a Covered Person exercises these rights, they shall take reasonable steps to ensure that their personal political activity is not, and does not reasonably appear to be, an activity of HDRI, including by not using HDRI's name, logo, platforms, or professional title in a manner that could create that impression.

A Covered Person who takes up a paid or senior role within a political party, or who becomes a declared candidate for elected office, shall notify the President or Secretary General, so that any necessary adjustment to their institutional responsibilities can be considered in good time.

Article 7 — Issue-Based Advocacy, Not Partisan Advocacy

HDRI's advocacy shall be framed around policy outcomes, evidence, and the substantive positions set out in its research, and not around the electoral success or failure of any party or candidate. HDRI may, consistent with this framing, state a clear and evidenced position on a policy question, including one that a political party has also taken a position on, without that position constituting partisan activity, provided the position is grounded in HDRI's research and applied consistently regardless of which party currently holds or seeks that position.

Article 8 — Neutrality in Research and Publications

HDRI's research and publications shall be conducted and presented in accordance with the intellectual integrity standards of Article 8 of the Code of Conduct, and shall not be designed, timed, or framed so as to principally serve the electoral interest of a party or candidate rather than HDRI's evidence-based mission.

TITLE III — CONDUCT DURING ELECTORAL PERIODS

Article 9 — Identification of Electoral Periods

For the purposes of this Policy, an '**electoral period**' begins on the official opening of the campaign period for a national, European, or, where HDRI is materially active in the relevant jurisdiction, regional or local election, as determined by the applicable electoral law, and ends on the official declaration of the result. Where no official campaign period is defined by law, the electoral period shall be deemed to begin thirty (30) calendar days before the date of the vote.

Article 10 — Prohibition on Endorsements

During an electoral period, HDRI shall not, in its institutional capacity, endorse, oppose, or direct members or the public to vote for or against any political party or candidate, whether explicitly or through language that a reasonable observer would understand as an endorsement or opposition.



Article 11 — Engagement with Candidates and Parties

HDRI may, during an electoral period, engage with candidates or parties on the substance of a policy issue within its thematic pillars, for example, by inviting candidates to a public forum, or by publishing a factual, non-partisan comparison of candidates' or parties' published positions on a policy question, provided that any such engagement is offered, so far as practicable, to all major candidates or parties on an equal basis, and that HDRI's own contribution is confined to a neutral presentation of fact and does not favour any participant.

Article 12 — Use of HDRI Platforms and Resources

HDRI's name, logo, website, social media accounts, mailing lists, and other institutional resources shall not be used, during an electoral period or at any other time, to promote or disparage a political party or candidate, or to circulate material that a reasonable observer would understand as doing so.

Article 13 — Personal Political Activity of Covered Persons During Electoral Periods

A Covered Person who is a declared candidate for elected office, or who takes an active public role in a party's campaign during an electoral period, shall not present themselves as acting on HDRI's behalf in that capacity, and, where their institutional role at HDRI would reasonably create a risk of the two being confused, for example, a member of the Board or a spokesperson under Article 20 of the Code of Conduct, the Board and the Covered Person shall agree appropriate measures, which may include a temporary step back from public-facing institutional duties for the duration of the electoral period.

Article 14 — Continuity of Substantive Policy Work

Nothing in this Title requires HDRI to suspend its ordinary research and advocacy activity during an electoral period. HDRI may continue to publish research, comment on policy developments, and advocate for the substantive positions set out in its thematic work, provided that it does so in a manner consistent with Articles 7, 8, 10, and 11 of this Policy.

TITLE IV — TRANSPARENCY AND INSTITUTIONAL COMMUNICATIONS

Article 15 — EU Transparency Register Compliance

HDRI shall maintain its entry on the European Union's Transparency Register accurately and up to date, and shall ensure that its declared activities, funding sources, and areas of interest on the Register are consistent with the actual conduct of its advocacy activity.

Article 16 — Disclosure of Funding Behind Advocacy Positions



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Where HDRI publishes an advocacy position or research output that has been supported by a specific grant, donor, or partner, HDRI shall disclose that funding relationship in the publication or accompanying material, consistent with the due diligence and institutional transparency standards of Article 16 of the Code of Conduct.

Article 17 – Lobbying and Meetings with Public Officials

A Covered Person who meets, in an institutional capacity, with a Member of the European Parliament, a member of a national or regional parliament, or an official of the European Commission or a comparable public body, for the purpose of advocating an HDRI position, shall record the substance of that meeting for HDRI's internal records and, where required by the rules applicable to the institution concerned, shall ensure the meeting is declared in accordance with those rules.

TITLE V – ENFORCEMENT AND FINAL PROVISIONS

Article 18 – Reporting a Concern

A person who believes, in good faith, that HDRI's institutional neutrality has been compromised, or that a Covered Person has engaged in partisan activity in HDRI's name, may report the matter through the channel described in Article 26 of the Code of Conduct or under HDRI's Whistleblowing / Speak-Up Policy, and is protected against retaliation on the terms set out in Article 27 of the Code of Conduct.

Article 19 – Investigation and Sanctions

A report made under this Policy is investigated and, where substantiated, sanctioned in accordance with Articles 28 and 29 of the Code of Conduct, having regard to the seriousness of any reputational or regulatory consequence for HDRI arising from the conduct in question.

Article 20 – Monitoring and Review

The Communications Director, in consultation with the President, shall monitor HDRI's compliance with this Policy on an ongoing basis, with particular attention during an identified electoral period, and shall report to the Board on the operation of this Policy at least once a year.

Article 21 – Amendment

This Policy may be adopted, amended, or repealed at any time by a simple majority decision of the Board, in accordance with Article 31 of the Statutes, and any amendment shall be communicated to all members within fifteen (15) days.

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Article 22 — Entry into Force

This Policy enters into force upon its adoption by the Board of Directors and remains in force, as amended from time to time, until repealed by a subsequent decision of the Board.

ADOPTION

This Political Neutrality and Electoral Period Conduct Policy, comprising Five Titles and Twenty-Two Articles, was duly adopted by the Board of Directors of the Human Development Research Initiative (HDRI) at a duly convened meeting, pursuant to Article 31 of the Statutes, and constitutes, from the date of its adoption, the Organisation's sole and complete policy on the matters it addresses.

Gurgen Petrosyan

President of HDRI

Date: 11 September 2026

Signature:

Sofia Balas

Secretary General

Date: 11 September 2026

Signature:

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