

OUR ETHICS

A System of Lighthouses
in Uncertain Times

“ It is wonderful what strength of purpose and boldness and energy of will are roused by the assurance that we are doing our duty.

— Sir Walter Scott

C4ADS is a nonprofit organization dedicated to providing data-driven analysis and evidence-based reporting on global conflict and transnational security issues. We use cutting-edge technologies to manage, integrate, and analyze disparate data from diverse languages, regions, and sources, incorporating our own field research from conflict zones and fragile states. We seek to engage with local and international audiences and produce compelling analysis on conflict and security issues. In doing so, we fill a critical gap left by traditional public sector and profit-driven institutions.



Being Proactive in Uncertain Times

Our motto, “Innovation for Peace” describes what we hope to achieve. **Our mission** springs from a simple proposition. State-sponsored and non-state illicit social networks poison the licit systems of trade, transportation, communications, and finance that power prosperity and security for billions of people around the globe. These illicit networks perpetrate the official corruption, transnational crime, and political violence that destabilizes states, prevents development, and devastates the environment. We seek to understand and disrupt illicit networks to create a world where open, pluralistic societies can be secure and prosperous. Illicit is not illegal. Illicit activity violates international norms, but may be locally legal. This is not a simple distinction. However, it is an important ethical one in a globalized world.

The volume, variety, velocity and availability of Publicly Available Information (PAI) continues to expand exponentially into an ocean of structured and unstructured data in a vast variety of formats and languages. The rapid use of this information, and the data behind it, has become an essential factor of modern life. The information terrain of every jurisdiction is constantly changing and expanding, with new access being created and old access being closed down, as various data sovereignty and privacy rules are applied or removed. The

simultaneous maturity of key technologies like 5G communications, quantum computing, 3D printing, democratized manufacturing, nano-technology, machine learning, and brain-computer interface will create an uncontrollable tsunami of data that will challenge our current understanding. As noted in our white paper, *Constructive Disruption*, with creative combinations of available data sets, the age of secrecy is over.

Media, think tanks, academia, industry, and government agencies are governed by common practices, legal constraints, and business limitations. Most, however, are still debating how to address ethics. Many are prone to a checklist mentality, compiling lists of rules and red-lines that constrain employee behavior. Moreover, the world is extremely dynamic and complex, presenting unforeseen challenges not addressed by existing constraints and limitations. Because of the time it takes to understand a changed environment, build consensus, and change laws, governance will fall further and further behind.

To address this gap, we need a strong set of clearly defined ethical principles for PAI research that empowers proactivity at all levels of decision-making, from interns to leadership.

Developing an Ethical Watch

We define ethics as a set of moral principles that guide our actions and decision making in an uncertain environment. There are different approaches to ethics that often interact. The virtue-based approach describes how an individual sees themselves and creates proscriptive and prescriptive lists of virtues to seek and vices to avoid. A consequentialist approach focuses on the impact of actions and decisions on others. A deontological or duty-based approach recognizes the autonomy of others and takes a positive approach to future actions and decisions. Organizations and individuals apply the principles derived from these approaches to address specific cases as they arise. Virtue-based oaths and lists of rules as redlines for behavior are difficult to adapt to specific cases and rapidly changing social environments. Consequentialist approaches are often difficult to reconcile, since understanding impact and second order effects on a variety of populations challenges decision makers.

C4ADS believes that a duty-based approach, with its emphasis on the value of individual autonomy and reason, is best suited to support an open, pluralistic society in a chaotic information age.

This positive approach, supporting our organizational culture, is focused on empowering our people instead of constraining them.

Our ethics are not a stand-alone document. They are reflected, for each of our employees, in the Executive Director's Leadership Philosophy, C4ADS Analytic Standards, our Ethos, Employee Handbook, and specific policies. Our Ethics are consistently demonstrated in our project choices, treatment of partners and team members, and organizational governance. **They are the result of our understanding of duty.**

Duty is defined as doing what we ought to do, when we ought to do it, with a spirit of selfless service.

As we research, analyze, and seek to influence the eco-system, C4ADS recognizes certain duties. These duties act as a system of lighthouses to guide us through the disruptive times ahead.

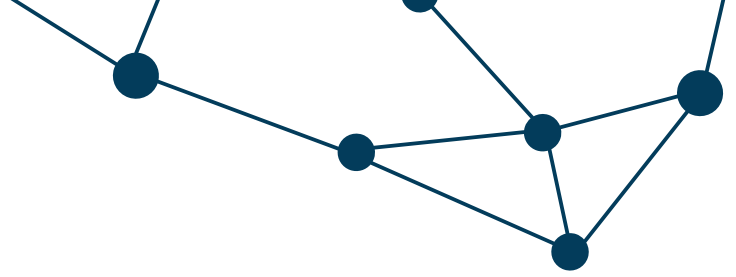
Our duties include:

The Duty to Act

With our capability and opportunity, C4ADS has an obligation to act. In open, pluralistic societies, governments are constrained to protect the rights of the individual. The First, Fourth, and Fourteenth Amendments to the Constitution of the United States spring to mind. These rights mean that data should flow freely, from the government and its agents to the people, to enhance trade and trust. In autocratic states, by contrast, data that flows only from the people to the government often encourages official corruption and enables tyrannical population and resource controls. All governments are by their very nature, cumbersome, bureaucratic, and cautious to adapt to new technologies and threats. Because of these constraints and limitations, and the contrasting opportunity available to non-governmental organizations, **C4ADS must lead the community and private sector in proactively seeking out illicit activity.** Then, having identified an evil, failure to act makes the observers accomplices to the pain it causes.

The Duty to Excel

To the best of our ability, we have an obligation to our partners in media, technology, academia, industry, government, and civil society to provide professional analysis with relevant, competent, material, and admissible evidence documented in strong arguments that support our findings. Built over the past two decades, C4ADS technology partnerships, access network, talented peers, and committed leaders provide unique opportunity. **We have an obligation to those talented analysts and staff who have served before us to live up to the highest standards they have set.** As a think-tank, with unique capability, we must seek out the hard problem and strategic impact, leaving the tactical and routine for appropriate contractors. We must seek continuous enhancement of our ability to conduct research and analysis in PAI, as well as influence the entire ecosystem to reduce the impact and impunity of illicit activity.



Our duties include:

The Duty to Collaborate

As a small part of an international team that includes media, academia, industry, civil society, and government, we have an obligation to collaborate with a wide variety of organizations around the world to accomplish our mission. This is only possible with mutual respect and trust. Trust is created over time by working together on important projects of mutual benefit. We need to be open and reliable in our dealings, identifying any conflicts of interest and meeting our obligations. Where partners have specific information confidentiality requirements for their mission needs, we need to respect their guidance. We must remember always that the value of legally obtained and managed PAI is to enable an eco-system with rapid, open information sharing.

Thus, we need to share what we have learned to intentionally create capability and capacity across

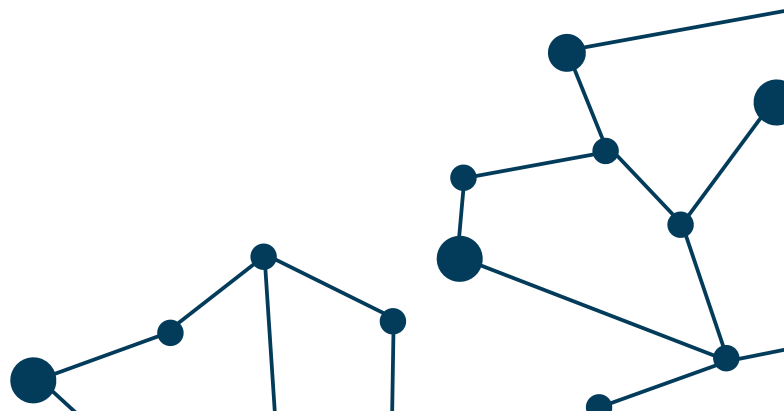
communities of interest. We must help each other succeed. It is in our Ethos. This is why we frequently provide technology and training to the public at no cost. As President Reagan noted, “There is no limit to the amount of good you can do, if you don’t care who gets the credit.” For this, we always seek to share credit and never claim someone else’s work as our own. We do not compete. We partner and recognize the successes of others in our field. However, we must always be careful with whom and how we partner to maintain our reputation for integrity and intellectual independence. As a non-profit think tank, we need to partner with government organizations that have legal authority to effectively impact illicit activity. But in doing so, we must always maintain our non-partisan political status and intellectual independence from the agenda of any particular funder.

Our duties include:

The Duty of Care

In the C4ADS Employee Handbook, there are specific Duty of Care, Anti-Corruption, and Conflict of Interest policies that relate directly to our legal obligations. Our ethical duty of care relates to the larger general concept including, and expanding upon, all five of the Ethical Journalism Network's core principles (Truth and Accuracy, Independence, Humanity, Fairness and Impartiality, and Accountability). **We have an obligation to each other, to the organization, and to the community for the foreseeable results for which our actions are the proximate cause.** We should strive to understand the potential second and third order effects of our work to avoid a direct result that creates more harm than good. We must dispassionately follow the evidence and err on the side of caution to avoid accusing the potentially innocent. We are not activists or judges. We do not determine the guilt or innocence of any subject. It is our goal to reduce illicit activity, not target any particular entity, nationality, or ideology. To

ensure this, we must examine alternatives, identify methodology, and seek corroboration using structured analytic techniques. We must adhere to C4ADS Analytic Standards to ensure we properly protect and handle Personally Identifiable Information (PII). We must ensure responsible use of emerging technology and capabilities in support our mission. We cannot fight illicit activity illicitly. We must carefully remain within the bounds of any current or future applicable laws such as the Foreign Corrupt Practices Act, the UK Anti-Bribery Act, the Unauthorized Computer Access Act, The EU General Data Privacy Regulation, and the Foreign Intelligence Surveillance Act Amendment 2008. We must ensure that staff, partners, contractors, and consultants thoroughly understand and agree to any risks. Further, we should also be clear about the analytical, legal, and ethical standards to which their work for us will be held. Should we act in error, we accept responsibility and work to create a remedy.



Our duties include:

The Duty to Sustain

We have an obligation to our predecessors, employees, partners, and consumers of our work to raise enough revenue to sustain C4ADS for its mission. **We only grow to support the mission, and while growing, carefully maintain our start-up culture.** The purpose of funding is to produce quality products and effectively influence the eco-system. However, while our goals are idealistic, we must be pragmatic about the path to achieve them. The quality of compensation, tools, and facilities C4ADS provides must support the kind of work environment that produces sustained excellence and impact. To support this, each different source of funding will come with unique constraints and limitations. We must recognize these upfront, but also be good stewards of C4ADS assets and aware of business and market limitations. This may mean delaying projects we would prefer in order to support a stakeholder's funded analysis. When facing difficult decisions, the protection of intellectual property for example, our actions should be in coordination, not competition, with the other duties. Thus, while sustaining our organization, we also avoid compromising our non-partisan political status or intellectual independence.

Charting the Best Course

Ethical decisions are not supposed to be simple. There is a difference between an ethical question, or conflict between duties, and a violation of law.

With **ethical dilemmas**, our first action should always be to determine if there is another approach to the problem that avoids creating an ethical challenge. For example, by using conceptual models and, thus, having a reasonable suspicion on the basis of which we can find competent, relevant, and material data, we can determine whether or not a specific data set, technology, relationship, or approach is the only possible way to accomplish our objective. Having a multi-disciplinary capability at C4ADS, we do not need to rely on any one type of data set, technology, partnership, or source to address our needs.

Next, we are all empowered to identify concerns and perceived **conflicts between duties** to create a discussion with C4ADS leadership. We must recognize that ethical conscience and the weighting of various obligations are often very individual. Ethical decisions are not based upon consensus building. In fact, it is the ability of ethical principles to resist the tides of politics and popularity that make them useful in an uncertain world. Since these questions are not simple, it will be rare for every individual to always agree with the reasoning of organizational leadership. When discussion of an ethical dilemma occurs with leadership, the challenge and reasoning should be captured for use in the Ethics instruction during our

Analyst and Intern Training Program, as well as openly discussed. Where an employee disagrees with the reasoning of leadership, despite open discussion and based on personal ethics, they should consider resigning.

A violation of law, including as related to interpersonal relationships, is much clearer. Any suspected violation of law, including any forms of harassment, should be immediately reported to leadership in accord with our Whistleblower Policy.

In conclusion, the principle that binds each of our duties is the spirit of selfless service.

This is truly the litmus test for our actions. Organizations and individuals can become tempted by greed, seeking celebrity, chasing the bright and shiny object of the day, extreme careerism, and nepotism. Therefore, we must examine our actions regularly to ensure that the primary benefit is always for the mission of the organization.



C4ADS

innovation for peace

C4ADS is a digital-age think tank dedicated to providing data-driven analysis and evidence-based reporting on global conflict and transnational security issues.

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