



cesvi



ETHICAL CODE

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INTRODUCTION

The Ethical Code is the official document of CESVI Foundation - ETS¹ (hereafter "the Foundation" or "CESVI") which contains the mission, the vision, the declaration of values and principles, the set of rights, duties and responsibilities that it holds with whoever collaborates with it or benefits from its projects or programs in the international solidarity and development cooperation sector.

In managing its activities CESVI abides by the principles of legality, correctness, transparency, loyalty, impartiality, independence, neutrality, full respect of the Foundation's value system and coherence with its history.

The Foundation is non-profit. Its exclusive aim is to seek social solidarity through the implementation of humanitarian aid and sustainable development works.

The Board of Directors, the statutory and legal organs, staff, collaborators, volunteers and partners (hereafter "recipients") are required to respect these principles throughout the daily conduct of the Foundation.

The Ethical Code must be employed as the instrument of guarantee and reliability to the significant advantage of the overall interests of the Foundation, the beneficiaries of the projects and the collectivity.

All those (suppliers, consultants, etc.) who in various ways collaborate with the Foundation are held, in the sphere of their dealings with CESVI, to respect the rules of the Ethical Code.

This document is to be considered, together with the Organisation, Management and Control Model of the Foundation, as a tool for preventing offences under the Legislative Decree 231/01².

The Foundation, in setting the ethical values that guide those who carry out whatsoever activity in the name of and on behalf of the same, follows the general conduct principles set out by the International and the European Union treaties, ratified by Italy in the field of Human Rights.

The Foundation is committed to carrying out the business envisaged in its Statute, respecting the laws in force and any possible future regulations, pertaining to those sectors and areas in which the Foundation operates.

¹ The Foundation's legal name is CESVI Fondazione - ETS or CESVI ETS according to Legislative Decree D.Lgs. 117/17, hereinafter referred to also as "CESVI"

² Organisational, Management and Control Model in compliance with Legislative Decree 231/01, adopted by the Foundation in 2018 and further amendments.

1. THE FOUNDATION'S MISSION AND VISION

Mission

CESVI operates worldwide to support the most vulnerable populations in promoting human rights and achieving their ambitions, for sustainable development.

Under the ideals of social justice and respect of human rights, CESVI pursues the wellbeing of vulnerable populations in condition of poverty or struck by war, natural calamities and environmental disasters. This is achieved, at an international level too, through works of humanitarian aid, in the context of both emergency and development, in support of the weakest categories – children, women, elderly and social outcasts –, supporting them in meeting their aims with the objective of promoting self-sufficiency in a sustainable future.

Vision

CESVI believes that the recognition of human rights contributes to the wellbeing of everyone on the planet, a shared home to be safeguarded.

2. VALUE SYSTEM

CESVI's conduct is inspired by the maximum integrity and honesty in all circumstances and areas in which it intervenes, both in institutional relations, in relations with donors and in the respect of beneficiaries' dignity.

Furthermore, the Foundation undertakes to respect the ethical principles of *legality, correctness, independence-neutrality and social responsibility*.

The principle of *legality* dictates compliance with regulations: CESVI refuses all illicit behaviour even when put into practice with the intention to meet the interests of the Foundation.

The principle of *correctness* implies respect from the recipients of the Ethical Code of the rights of everyone in any way involved with the Foundation's activity. From this point of view the Foundation and all its agencies act in respect of the fundamental human rights avoiding in their relations with counterparts any discrimination based on age, gender, sexual orientation, state of health, race, nationality, political leanings and religious beliefs.

According to the principle of *independence-neutrality*, CESVI is completely independent of private interests and acts autonomously from governmental policies, aware of its signature social role towards the beneficiaries and the collectivity, preserving its neutrality in the fields of intervention.

3. MANAGEMENT PRINCIPLES OF THE FOUNDATION'S ACTIVITY

3.1 General Principles

In the management activity of the Foundation, everybody to whom this document is addressed, while bearing in mind the non-profit objectives of CESVI, must refrain, in any situation and even if subjected to illicit pressure, from making or promising to third parties payments of sums of money or other earnings in any form or way, even indirect, to promote or foster the interests of the Foundation.

The recipients may not accept for themselves or for others payments of sums of money or other earnings or promises of such to promote or foster the interests of third parties dealing with the Foundation.

Exception to this prescription is made only for complimentary gifts of modest value (upper limit fixed at €100) when these are ascribed exclusively to acts of courtesy within correct institutional relationships and are not expressly forbidden or, in any case, cannot influence the autonomy or the independence of the third party.

All individuals who, in carrying out their activity on behalf of the Foundation,

find themselves in situations of conflict of interest must immediately inform their hierarchical superiors, who will promptly inform the Supervisory Body, which is supposed to monitor the application of this Ethical Code.

3.2 Conduct criteria of the recipients of the Ethical Code and sharing of the principles

Compliance with both the law and the regulations provided for by this document is necessarily required from all the recipients.

The behaviour of all subjects who collaborate with the Foundation, as well as being in one with its mission, its vision and its internal policies, must be based on the principles of professionalism, diligence and correctness set forth in this Ethical Code.

Of all the recipients it is required that this Ethical Code be signed by all employees, partners and associates, and volunteers as and when they receive their copy.

Furthermore, the recipients are required to abide by all that is expected in the Organization Management and Control Model of CESVI.

3.3 Relationships with suppliers and consultants

In dealings with suppliers and consultants, all the recipients must give priority to the interests of the Foundation, avoiding behaviours that might lead to personal advantage.

To that end the recipients must abide by the provisions of the Organisation, Management and Control Model on the subject of selection and management of suppliers of goods, services and works, and in entrusting consultant assignments.

Furthermore, contracts drawn up with suppliers and consultants must explicitly call for the suppliers and consultants to observe the principles set out in the Ethical Code and in the Organisational, Management and Control Model.

3.4 Relationships with the Public Administration

The relationship between CESVI and the Public Administration (including institutional donors) must be based on the respect of law, of the provisions set out in the Organisational, Management and Control Model in reference to the Legislative Decree 231/01 and the criteria set out in this Ethical Code.

In particular, those who act on behalf of the Foundation must not:

- offer gifts, unless of little worth and as common courtesy, without the prior authorisation of the General Manager or their immediate superior;
- solicit confidential information or influence inappropriately (that is, through behaviour not envisaged in the Foundation's mandate) the decisions of a public institution;
- have dealings with representatives of the Public Administration without a specific mandate, proxy or authorisation.

Those who act on behalf of the Foundation are expressly forbidden from divulging information coming from the Public Administration or putting in any way at risk the confidentiality of the public body's data and information.

3.5 Relationships with beneficiaries of programmes and/or projects

All employees, partners and associates of the Foundation are required to behave irreproachably with the project beneficiaries, using particular care with the most vulnerable classes: minors, women, the elderly and social outcasts.

The implementation of projects and/or programs must be founded on the principles of equity, uniformity and confidentiality, bearing in mind the non-profit nature of the Foundation.

The heads of each Department and Office, therefore, undertake to respect and have carried out all the provisions of the Foundation's Organisational, Management and Control Model and ensure that all employees and partners of the Foundation are aware of their responsibility as to privacy and confidentiality.

3.6 The rights due to beneficiaries of programmes/projects

Among the fundamental rights that CESVI promotes, in its capacity as a non-profit entity, is the achievement of the beneficiaries' aspirations, by promoting their autonomy and by pursuing future sustainability.

The Foundation promotes the involvement of the collectivity and of the local communities in experiences of solidarity and social interaction, with a shared activity methodology, encouraging continuous dialogue and collaboration with the local partners and the civil population while respecting their culture and traditions.

3.7 Relationships with the media

The Foundation is committed to providing data and information that is correct and

true.

Dealings with mass media are exclusively reserved to spokespersons designated within the foundation, who receive from the Communication Department all the information that are to be divulged.

3.8 Conduct criteria for the relations between employees and managers

In the realm of management of relations with colleagues, be they employees or freelance, the Foundation refuses any form of discrimination.

The Foundation selects and hires its employees, directors, collaborators and partners on the basis of the correspondence between their professional profile and the needs and requirements of the Foundation, assuring in every case equal opportunities for all the candidates, avoiding illicit favoritism and any form of influence peddling.

Moreover, it is forbidden – to whoever might be able to take advantage of their position in the hierarchy within the Foundation – to ask of the employees or partners, directly or indirectly, services, personal favours or whatsoever conduct that would violate the provisions of the Ethical Code.

CESVI recognises the key role of human resources for the organisation, including volunteers, and fosters the maximum fulfilment of individuals' potentiality while supporting them in their professional development, holding training courses.

The Foundation guarantees the respect and the dignity of every collaborator both as an individual and within relationships, as well as the application of all the contractual rules and regulations concerning safety, workplace health and protection of confidentiality of personal data.

3.9 Transparency

The Foundation, bearing in mind its non-profit nature, is aware of the importance of transparency, accuracy and completeness of accounting data, and takes pains to set up a reliable administrative-accounting system that correctly represents the details of the administration and supplies the tools to identify, prevent and manage, as far as possible, the financial and operative risks, as well as fraud to the detriment of the Foundation or third parties.

The Foundation takes care to protect the privacy (EU GDPR 679/2016) of individual donors and beneficiaries.

CESVI is also aware of the importance of providing the donors and stakeholders in general with the objectives and the results achieved through its interventions, with accurate information on the programs completed.

3.10 Tax Compliance

The Foundation undertakes to carry out with completeness and transparency all the tax obligations imposed on it by current regulations and to cooperate, where

required, with the tax authorities.

Tax returns and tax payments represent behavior that is not only legally obligatory but also inescapable as part of the Foundation's social responsibility.

The keeping and preservation of records in accordance with the law is also essential for the correct assessment of taxes. The recipients of this Code of Ethics must not in any way commit or concur with others in committing criminal violations in tax regulations and must promptly report any violations to the Supervisory Body.

3.11 Anti Money Laundering

The Foundation and all its collaborators undertake not to carry out or be involved in activities that involve laundering (i.e., accepting or processing) income from criminal activities in any form or manner. All collaborators must check available information (including financial information) on counterparts, suppliers and third parties in general in advance to ascertain their respectability and the legitimacy of their activities before establishing strategic and operational relationships with them.

3.12 Contraband

The Foundation undertakes to ensure the issuance of accounting or tax documentation consistent with the import/export transactions actually carried out by it.

And also ensures the regular introduction into the territory of the state of goods subject to border rights, paying special attention to compliance with customs regulations. It undertakes to ensure the prior verification of forwarding agents it may use and to ensure the traceability of customs operations.

3.13 Condemnation of all forms of Criminal Association

The Foundation condemns any form of criminal association, both nationally and internationally, and undertakes not to establish any relationship with individuals involved in criminal associations or to finance or facilitate their activities.

It is expressly forbidden to engage in any behavior that may constitute or is connected with forms of criminal organization, criminal associations, mafia-type associations, associations aimed at tobacco smuggling or the illegal trafficking of narcotic or psychotropic substances, as well as illegal immigration, both nationally and internationally.

3.14 Data Protection and Privacy

Confidential information concerning collaborators is handled by the Entity in accordance with the reference regulations in force, in such a way as to ensure

maximum transparency to those directly concerned and inaccessibility to third parties, except for justified and exclusive business reasons.

The Foundation, adopts appropriate and preventive security measures for all databases in which personal data are collected and stored, in order to avoid the risk of destruction, loss, dissemination or unauthorized access or unauthorized processing.

The Foundation assures that data will be processed according to the stated purpose; personal data will not be used for secondary purposes without the prior consent of the data subject and furthermore, the data controller within the organization, without undue delay and, where possible, within 72 hours of becoming aware of a data breach c. d. "data breach" such as to compromise the confidentiality, integrity or availability of personal data, undertakes to notify the Data Protection Authority of the breach unless the personal data breach is unlikely to pose a risk to the rights and freedoms of natural persons, as per Reg. (EU) 2016/679 and Italian Legislative Decree 101/2018.

4. HEALTH AND SAFETY AT WORK

The Foundation is particularly sensitive to the question of health and safety at work in order to avoid risks connected to the carrying out of the activity. It therefore asks its staff to respect all the legal obligations of the relevant regulations. In particular, the Foundation:

- provides its staff with adequate information/training about health and safety;
- makes sure that all its employees work in a safe environment and that they have available appropriate protective gear;
- uses and maintains adequate safety devices;
- periodically verifies the suitability of the offices ensuring the workplaces' compliance to national and local Safety and Health Employees Legal Requirements, and asks all the staff to respect all the related provisions;
- asks all third parties that work on its behalf to guarantee the workers' and others' health and safety in carrying out the assigned work.

The Foundation asks all recipients the utmost willingness and collaboration towards whoever may come to make inspections on behalf of the Foundation and/or the authorised control bodies. To this end, should a representative of the Foundation come upon anomalies or irregularities on this subject, he or she must promptly inform the Health and Safety Officer.

The staff of the Foundation must not place the other employees in situations of unnecessary risk that might cause damage to their health or their physical safety.

5. WORKPLACE ENVIRONMENT

The Foundation considers reprehensible and offensive, and therefore refuses the following behaviour:

- be on duty under the effects of abuse of alcohol, drugs or substances that have analogous effects;
- consume or give away for any reason narcotic substances while at work;
- keep pedophilia/pornographic material in premises that have anything to do with the Foundation.

6. PROTECTION OF THE ENVIRONMENT

The Foundation pays particular attention to environmental issues in all its initiatives and to this end it doesn't limit its action merely to respecting the local and international regulations in force.

CESVI also implements programs safeguarding the planet's environment for sustainable development, of contrasting the effects of climate change, and for a management of the environmental resources in order to allow current and future generations to enjoy them.

7. INTERNAL CONTROL SYSTEM

Control of the application of the Ethical Code is entrusted to the Supervisory Body, as defined in the Organisation, Management and Control Model, in compliance with Legislative Decree 231/01 which identifies the rules of behaviour, procedures and methodologies which make it possible to adequately tackle errors, fraud and risk factors which impede the correct running of the Foundation's activity.

8. PROMOTION AND DISSEMINATION OF THE ETHICAL CODE AND SANCTIONS

The Foundation, in order to guarantee its observation and effectiveness, takes on the responsibility of disseminating this document and assigns the monitoring of the application of this Ethical Code to the Supervisory Body.

In particular, the Foundation undertakes:

- to disseminate the Ethical Code and to see to its periodical updating;
- to make available any instrument required to ensure full application;
- to carry out, through the Supervisory Body, the checks concerning every report of violation of the norms set out in the Ethical Code and, in the case of verified violations, to carry out adequate sanctions.

In order to make the application of the Ethical Code effective and to apply the sanctions provided for in case of violation, the Foundation undertakes to communicate to the Supervisory Body both verbally and in writing anything relevant about the violation of the principles.

All members of the Supervisory Body must ensure the confidentiality of the identity of the whistle-blower in good faith, except where the law provides otherwise.

This document will be published on the internet site website www.cesvi.eu and will be distributed to everyone who collaborates in any way with the Foundation to the end that they be aware of the moral values, of the criteria of general and specific behaviour which permeate every activity which the Foundation undertakes.

Knowledge of the provisions of the Code, and compliance with them, represent an indispensable requirement for creating and maintaining collaborative and correct relationships with third parties, in respect of whom the Foundation undertakes to provide all relevant information.

To those employees and managers who violate the provisions contained in this Code will be applied the sanctions of the disciplinary system of the National Labour Law, which is an integral part of the Organisational Model adopted by the Foundation in compliance with the Legislative Decree n. 231/01.

Violations of the provisions contained in the present Code by the recipients are considered grave shortcoming on the recipients' part and might constitute reason for dissolution of the contractual relationship.



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