



CODE OF ETHICS¹

The Code of Ethics issues from the values and the principles stated in the Values Charter and sets the rights, duties and responsibilities for all INTERSOS operators, collaborators, partners, advisers and members of the statutory bodies to which it is addressed.

The INTERSOS mission is consistent with the values and ethical principles common to every human being. Its purpose is to pursue its founding objectives by means of clear, precise and transparent regulations in conformity to existing laws. The mission includes the observance of values and ethical principles common to every human being, such as honesty, loyalty, probity and those pertaining to its nature as a humanitarian organisation: humanitarian relief, neutrality, impartiality, independence, non-discrimination, transparency.

In particular, with reference to the Values Charter itself:

- INTERSOS believes in focussing on the human being and in the principles of equality, justice, peace, and solidarity; consequently, in the duty of every individual to provide relief, without condition, to all who are needy and suffering.
- INTERSOS adheres to the principles of the Universal Declaration of Human Rights and the European Convention on Human Rights, the Convention on the Right of the Child and the Convention on the Elimination of All Forms of Discrimination Against Women. It applies no distinction or discrimination based on race, gender, religion, nationality, ethnic origin or class of the people who require aid.
- INTERSOS considers the victim such in any case, irrespective of any political, religious or social differences. Its humanitarian action is impartially directed at any population or person who is in danger or in a serious state of need. This does not prevent INTERSOS from identifying any individual or institutional responsibility for single catastrophic events that are either natural or man-made, or from taking a public stance.
- INTERSOS is not subjected to any national or international imperium or ideology. Its freedom of thought and judgement allow it to condemn any human rights violation, injustice and iniquity, without condition. The same principle of independence determines the criteria for its choice of both public and private donors.
- INTERSOS humanitarian action is expressed by methodologies and behaviours attentive to local cultural and religious settings.
- INTERSOS has a human being's value and dignity as the focus of its action. As a consequence, local populations are immediately involved in activities, employing to capacity and developing the competences and skills of individuals and communities, thereby gradually eliminating their reliance on external aid. Relations with local populations are grounded on listening capacity, dialogue, discussion and participation.
- INTERSOS considers solidarity and expertise two essential and inseparable components of its humanitarian action, and therefore the essential elements of its response to any population needs with humanity, effectiveness and quality.
- INTERSOS operations rely on donations from public and private donors. The accounts for each single project are audited by public donors and certified by auditors. The overall financial year statement of accounts is certified and disclosed.

Ethical Code recipients and application area

The Ethical Code (Code from here on) conforms to the stakeholders' requirements and expectations (be they donors, supporters, or beneficiaries) and intends to regulate the behaviour of the following recipients: members of statutory bodies, operators, partners, advisers and all who pursue the Organisation's objectives (Recipients from here on).

Recipients' behaviour must safeguard the Organisation's respectability, image and assets.

Code values and principles must first be applied by top management in their operations both inside and outside the Organisation, and in the promotion of confidence, cohesion and team spirit.

The Code's principles integrate the moral codes each Recipient must observe, both regarding the general obligations for due diligence, probity and loyalty defining the working activity, and in relation to the Organisation, management and control model (Model from here on) or to the Organisation's Regulations and Procedures disciplining specific activities.

¹ Integral part of the Organisation, management and control model (with ref. to D.Lgs 231/2001).

The Code is communicated to all Recipients by means of suitable media. In particular, each operator is called upon to acquire a knowledge of the Code, actively contribute to its implementation and point out any deficiencies.

Conformity to existing laws and regulations

Recipients are committed to adopt every suitable preventive measure and control to ensure that their activities fully conform to existing laws and procedures in every geographic area and at every decisional and executive level.

Recipients, with due respect for existing laws and regulations, are bound to act and behave on the basis of the values, principles and commitments set down in the present Code.

Principles of probity and impartiality

Recipients must avoid any discrimination based on sex, health, age, nationality, politics and religion in the relations they entertain with subjects involved in operations.

Recipients are required to adhere to principles of probity and honesty in carrying out their professional tasks. The same criteria apply to relations between Recipients at all levels.

Donor relations

The Organisation relies on public and private funding to implement its operations in Italy and in other countries.

Relations with donors are based on the utmost probity and clarity.

It is prohibited to give, offer or promise cash or other utilities or favours to public donors in Italy and in missions, which may reasonably be interpreted as exceeding the normal practice of courtesy. It is also prohibited to exercise undue pressure on public officials, public service officers, executives, functionaries or employees of both Italian and foreign public administrations or European or international public bodies or on their relations or cohabitants.

It is also prohibited to provide false declarations to the abovementioned subjects with a view to obtaining public subsidies, contributions or funds.

It is prohibited to destine any sums received from the abovementioned subjects in the form of subsidies, contributions or funds for any purpose other than that for which they have been disbursed.

Private companies intending to support humanitarian projects even by the supply of goods or services, are required by the Organisation to safeguard human rights, worker rights and the environment.

The Organisation refuses donations of either materials or cash offered by companies which produce or trade in armaments, pornography and any such pursuit oriented toward the exploitation of the human being and the deterioration of the environment.

Partner relations

The Organisation promotes and encourages the active participation of local partners in its activities for the implementation of humanitarian relief and the realisation of its purposes and objectives.

The choice of partner (Agencies or Associations) is based on the following criteria:

- non-profit organisation
- independence from any imperium or ideology
- action in line with the Organisation's own ethical principles
- concurrence with the Ethical Code.

Local partners may be public; however, in this case they must ensure the Organisation's freedom of movement and decision with regard to its declared objectives and purposes.

The Organisation encourages the development of local organisations by enhancing and developing the competences and skills of individuals and communities, also with a view to providing continuity to humanitarian action.

Supplier relations

The Organisation privileges the procurement of goods, tasks or services for cooperation and humanitarian relief from technical and economic sources in the Countries of operation, pending assurance of its essential good quality.

The choice of suppliers and the procurement of goods, works and services is based on objective evaluation regarding competitiveness, quality, economy, price, integrity: principles set down in the Organisation's Model and Operations Manuals.

Recipients are obliged to adhere to these principles, just as they are obliged to conform to the Organisation's procurement provisions.

The Organisation reserves the right to adopt any suitable measure, including termination of contract, with regard to any supplier who breaks the law and violates human rights or whose behaviour otherwise damages the Organisation's image in carrying out activities on account of and/or in lieu of the Organisation.

Press and mass media relations

The Organisation communicates with the press and mass media solely through its Secretary General and delegated officers whose approach must be based on the utmost probity, availability and clarity. The Organisation's external communications must be factual, thorough, verifiable, non-aggressive, and respectful of individual rights and dignity.

Relations with control and auditing bodies (supervisory body, auditors, Internal Audit)

Relations with control and auditing bodies must also conform to principles of integrity, timeliness, probity and clarity. They must be given the maximum collaboration in avoidance of any sort of obstructionism. It is also prohibited to omit information or supply false documentation or make untrue statements or in any way impede or hinder these subjects from undertaking their control or auditing activities.

Relations with the Judiciary

It is prohibited to exercise any undue pressure on anyone summoned to render statements before the Judiciary, either with the purpose of preventing them from rendering their declarations or of inducing them into rendering false declarations.

It is prohibited to aid and abet anyone who has committed an illegal offence so that he/she may escape the authorities' inquiries or investigations.

Privacy: the use and protection of data

The Organisation guarantees the privacy of personal data in its possession and abstains from researching personal data, with the exception of a formal approval by interested parties and in any case always in conformity to the law. It ensures the use by Recipients of any personal data acquired in relation to their activities with the Organisation exclusively for the due purposes of their tasks.

Consequently, Recipients are obliged not to reveal to third parties any data concerning the Organisation's technical, organisational and financial assets; likewise for all undisclosed data, except in the case in which this disclosure is laid down by law or other internal provisions.

The highest security level is ensured by the Organisation in its choice and use of information technology systems for personal and confidential data processing, in accordance with existing laws on privacy.

Corporate governance

The Organisation adopts a Corporate Governance system of regulations and procedures which set the guidelines for the forthright and responsible behaviour of all operators toward beneficiaries, donors, suppliers and all third parties, consistent with provisions in the Values Charter, the Model, the Ethical Code and internal Procedures. Consequently, it has set up a Supervisory Body of three advisers selected by the Members' General Meeting and a function of the Internal audit, as well as the certification of its Annual Financial Statement by an independent Auditing company, as per article 13 of the statute.

The Model, approved by Members in the 30 June 2009 General Meeting, also comprises the Ethical Code, the Values Charter, the risk assessments, and the Protocols for mission and project management.

Control systems

The Organisation's quality and effectiveness is a primary objective to be achieved by means of controls put in place starting from its organisation and internal management levels.

Empowerment at all levels jointly with the monitoring of the quality and effectiveness of these levels of responsibility must become a widespread culture.

Internal control must therefore be considered positively, given its potential contribution to improving the Organisation's quality, efficiency and effectiveness.

Internal control comprises any necessary or useful tool to address, support, improve and check the Organisation's activities with a view to ensuring conformity to the law, the Model and Procedures, so as to safeguard the Organisation's assets, manage its activities with maximum efficiency and provide accurate and complete accounts and financial data.

The realisation of an effective internal control system must constitute a common commitment at every organisational level. Consequently, all Recipients must apply the competent controls within their functions, and notify any malfunctions and possible improvements of the internal control system to the competent function (Internal audit).

The competent internal control functions must encounter no constraints or limits in their access to company data, files and assets in the execution of their mandate. Moreover, they are obliged to notify their proposals to the Supervisory Body concerning possible upgrading of risk management policies, measurement tools and existing procedures, also providing periodic reports on the results of their activity and any malfunctions encountered.

Book-keeping and statements, information sheets and similar documents

The Organisation applies the competent laws and regulations in the drafting of its balance sheet, also with reference to provisions issued by the Agency for non-profit organisations. It adopts all mandatory administrative/bookkeeping documents and mandatory information sheets for its donors.

The Organisation's bookkeeping conforms to universally established and regulated account management principles. Its annual statements are subject to certification by independent certified auditors. Information and data provided to third parties and account management must guarantee veracity, clarity, precision, accuracy and thoroughness.

All Recipients are held to the maximum collaboration so that operations may be correctly and promptly accounted for in the Organisation's statements, thereby providing faithful and correct information on the Organisation's economic and financial situation and assets.

A back-up document must be kept for each record relating to a transaction. This documentation must define the motive for the operation which generated the record and the pertinent approval, where necessary. The back-up document must be readily available and stored according to provisions as per the protocols attached to the Model, so facilitating their consultation also by competent internal and external control bodies.

Human Resources

The Organisation considers human resources in Italy and countries of operation a fundamental element. Operators' dedication and professionalism are essential values and prerequisites for the achievement of the Organisation's purposes and objectives.

Consequently, the Organisation endeavours to develop operator competences so that each may fully express his/her potential.

Within this ambit, it provides operators with the same opportunities for professional growth, by means of a fair merit-based process excluding any discrimination based on sex, age, disability, religion, nationality, race or political and trade-union affiliations.

The Organisation adheres to the principles of the Universal Declaration of Human Rights and the European Convention on Human Rights, the Convention on the Right of the Child and the Convention on the Elimination of All Forms of Discrimination Against Women.

The Organisation endeavours to take due account of specific local issues in its choice of operators for the missions, so as to ensure the maximum level of security.

The Organisation endeavours to ensure:

- an adequate and functional working environment for its activities;
- a frank, collaborative and communicative context;
- a suitable behavioural context to promote the distribution and knowledge of the Organisation's objectives and to extend a positive influence on people's quality of life;
- the recognition and valorisation of individual competences and contributions to the achievement of common objectives;
- the adequate and clear circulation of information for the regular performance of activities and relating to the work organisation;
- suitable education processes for individual roles and tasks;
- an accurate protection of privacy;
- an adequate prevention and balanced management of any conflicts among operators, should they arise;
- a constant listening capacity toward any person who may be the object of action or behaviour which goes against the abovementioned principles;
- an adequate information to operators on living conditions and security in the countries of operation, as well as on preventive health measures to be taken.

Upon commencement of the working relationship each employee and collaborator receives due information on:

- 1) terms of reference for functions and duties to be performed;
- 2) legal elements and salary applicable to the specific work contract;
- 3) regulations and procedures for the working activity to be performed at the highest possible level of security.

Moreover, the Ethical Code is undersigned by every operator and the Organisation's Model and Protocols are made available.

Every operator must:

- respect the fundamental rights of human beings, with particular reference to the right of the child and to the elimination of any form of discrimination against women.
- adopt a behaviour and apparel considerate of colleagues, partners, users, local cultures and confessions and which constantly reflect the dignity of his/her role, in line with the Organisation's principles;
- avoid the application of any discrimination in internal and external relations, and the use of any violence, threat, or abuse of authority which may reduce any person to a state of subjection.

It is prohibited for any operator to:

- become involved in military operations and political activities subversive of law and order;
- employment of minors in project activities
- exercise even a legitimate conduct which may induce the authorities, partners and the population to sustain that such an involvement is taking place;
- exercise a conduct which may procure damage to the Organisation, even if to its image;
- adopt a behaviour which may be configured as a moral aggression and/or psychological persecution aimed at causing offence to the dignity and psychological and physical integrity of subordinates or at degrading the work environment (mobbing);
- exercise any kind of sexual harassment
- have sexual relations with minors
- enact payments or transactions incorrectly and counter to money laundering legislation and to spend or circulate counterfeit or altered monies, even if received in good faith.

The Organisation's behavioural guidelines and proscriptions are defined in the Model and adopted by the internal Protocols and Procedures.

Employment of the Organisation's assets and/or other donor assets

All operators are provided with material and immaterial assets such computers, printers, equipment, vehicles, software, know-how, strategic and financial plans, etc.

Their protection and conservation is of fundamental value for the protection of the Organisation's assets. The employment of these assets by practitioners must consequently be functional and exclusive to the organisation's operations and to the purposes approved by specific functions. Employees must treat and use these assets with due diligence, care and confidentiality in the course of their activities, and also prevent and impede an improper or fraudulent use by third parties.

Specifically:

- computers or laptops and relative programmes and applications are working tools to be safeguarded in an appropriate manner and to be returned together with all data and information pertaining to the executed task. The data and information must be returned in an orderly, identifiable and legible manner, also in the event of own personal computers having been used;
- regarding the use of the Internet, access to sites pertaining to assigned tasks is permitted as long as this does not delay their execution; the participation in forums or internet chat lines is prohibited, except for reasons pertaining to assigned tasks and in any case previously authorised;
- email addresses assigned to operators are also working tools; consequently, their use for reasons other than those pertaining to the execution of assigned tasks is prohibited, and specifically the mailing or storing of messages of an offensive or sexual nature are prohibited;

- with the exception of specific approval, it is prohibited to install and/or reproduce software and other materials safeguarded by the law: in fact, this activity exposes the doer to the risk of possible civil and criminal action, apart from being considered an improper use of corporate information technology resources;
- each operator is obliged to ensure the confidentiality of news items acquired during the course of their working activity and not published or placed in the Organisation's website.

Conflict of interest

Any decision regarding the Organisation's policies (procurement contracts, partnerships, personnel selection, etc.) must be taken in consideration of the Organisation's opportunities. It must consequently be based on solid assessment and never be dictated by direct or indirect personal interests.

In this light, the following exemplify possible issues which will be carefully monitored:

- relations or commercial negotiations with parties who employ or are controlled by relations or regular friends;
- direct or indirect possession of not merely symbolic quotas in companies which have or intend to have commercial relations with the Organisation or same sector operators;
- work provided to third parties, unless previously authorised by the Organisation, or in any case activities contrary to or incompatible with assigned duties.

Each issue which may constitute or determine a conflict of interest must be communicated promptly to a superior for the appropriate evaluation and direction.

It is moreover prohibited for operators to accept cash or other favours from third parties for advice or services rendered in connection to their relations with the Organisation.

Any remuneration for academic activity or participation in conferences, transmissions and such, is regulated by the internal provisions.

FINAL PROVISIONS AND IMPLEMENTATION

Communication and education initiatives

The principles outlined in the Code must be communicated to all personnel and must be subject to periodic communication and education initiatives.

Notification of Code infraction

Any infraction by operators of the Code's principles and provisions must be promptly notified to the Supervisory Body. A notification of infraction will be taken into account only in the presence of sufficient information to identify the terms of said infraction and to enable an appropriate inquiry by competent functions.

The Organisation acts in such a way as to safeguard the notifier against any repercussion, discrimination or retribution, also with regard to the confidentiality of his/her identity, excepting any obligation to the law and the protection of the rights of any person or persons wrongly and/or maliciously accused.

Consequences deriving from a Code infraction

Non-observance of guidelines set down in this document may provoke serious damage to the Organisation's assets and image.

The Organisation reserves the right to take any measures deemed necessary to safeguard its image and assets, by means of both sanctions and legal processes.

Conformity to the Code's restrictions

The present Ethical Code was passed by a vote of the Members' General Meeting on 30 June 2009.

Any update, change or addition to the Code must receive the Board's prior approval.

A copy of the Ethical Code is handed to the Recipients for their undersigning and is available for on-line consultation in the website.