

CODE OF ETHICS AND CONDUCT

Approved by the
GENERAL ASSEMBLY OF COSPE MEMBERS
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INTRODUCTION

This **Code of Ethics and Conduct** establishes all the rights, duties and ethical and social responsibilities of those who, in various capacities, participate in the life of the Association, and collaborate in its activities: statutory bodies, members and partners, workers, volunteers and consultants. It also defines the rules governing relations with third parties: beneficiaries, partners, suppliers, financing entities and donors, media, auditing bodies and stakeholders. The implementation and compliance with the Code by all persons and entities involved is considered an essential element in the realization of any activity, and COSPE ONLUS ensures its knowledge and diffusion, with the goal and commitment to prevent non-compliant acts and conducts, and to identify and sanction any kind of violation, by those who collaborate both directly and indirectly with the organization, towards whom actions based on zero tolerance will be foreseen. The **Code of Ethics and Conduct** refers to the principles listed and affirmed in the following conventions and international codes to which COSPE adheres: Universal Declaration of Human Rights of Nations United; UN Convention for the Rights of the Child; UN Convention for Women's Rights; Fundamental Conventions of the International Labor Organization (ILO). The following documents, which regulate in more detail specific matters and are approved by COSPE statutory bodies, are linked to the Code of Ethics and Conduct: "*Working at COSPE - Charter of Principles*"; "*Code of Ethics for the protection of girls, children, adolescents*"; "*Self-regulation code of research and fundraising activities in the private sector*". Every variation of the present Code is subjected to the evaluation and approval of the General Assembly.

1 - PRINCIPLES AND VALUES

We are a private, laic and not-for-profit association which operates in the field of international cooperation, in Italy and in over twenty Countries in the world, alongside thousands of women and men who share their daily commitment to make this Planet a common home to take care of for all people, for all populations, for all living species that inhabit it.

1.1. Vision

We work for a world with many voices, where diversity is recognized as the most precious asset, where we are contaminated and enriched by every encounter. A world where all people can live in a dignified way, in full respect of their rights and their dignity, having access to basic goods and services that nature, society, economic development can offer.

1.2 Mission

We promote dialogue and collaboration between individuals and peoples, supporting the research and dissemination of effective solutions to build a world of peace and hospitality, with more rights and democracy, more social justice and environmental sustainability, in the name of equality between women and men and of the end of all discrimination.

1.3 Values

Pluralism. We promote cultural and political pluralism and we are open to dialogue with all people without ideological, political and religious prejudices.

Dignity. We are committed to affirm the dignity and to ensure equal opportunities for everyone, under all circumstances, against any kind of discrimination.

Encounter. We see a great opportunity for growth in the encounter with every person, every population, every culture, every laic and religious tradition with which we come into contact, and we commit ourselves to establish relations of respect with them, to deepen our knowledge and to understand their reasons and value.

Solidarity. We believe in solidarity between individuals and between peoples, as the foundation of social organization and international relations.

Transparency. We seek transparency in the management and communication of all our activities and initiatives.

Change. We believe in a change that moves from the periphery to the center and from the bottom towards the top, supporting and giving voice to the initiative of local communities, associations and movements of civil society.

Collaboration. We regard the collaboration with organizations and institutions that share our vision to be essential for the achievement of our strategic objectives.

2 - RULES OF ETHICAL CONDUCT

2.1 Legality

Anyone who participates in the associative life, carries out professional or voluntary activities on behalf of COSPE, must comply with the principle of legality, and respect the laws and regulations in force in the European Union, in Italy, in all the Countries in which the Association operates, as well as its internal codes and regulations. The same principle also applies to all

organizations, businesses, third-party institutions with whom COSPE establishes any type of relations in carrying out its activities and pursuing its objectives.

2.2. Honesty, loyalty, fairness

Honesty, loyalty and fairness are the founding principles of the internal life and external relations of the Association. The conduct of all those who, in any capacity, carry out activities with or on behalf of COSPE, in Italy and all over the world, must follow these principles.

2.3 Working Relations

COSPE deems its collaborators a fundamental value for the Association and strives to develop their skills and competences, to reward commitment and motivation, so that all of them can express their potential at best, guaranteeing the same opportunities and conditions of treatment, without privileges and discrimination of any kind. It recognizes their rights and guarantees their full respect in the current legislation. It requests them to share the responsibility of an employment relation model coherent with the principles and values of equity and solidarity that are the foundation of COSPE's associative agreement and project, and to actively collaborate to ensure its efficiency and economic sustainability (for details see the annex "*Working at COSPE - Charter of Principles*"). All collaborators are ethically responsible for their conduct and aware of representing COSPE in their own actions.

2.4 Impartiality and conflicts of interest

Every decision relating to COSPE's operations and activities must be adopted for the benefit of the Association and for the pursuit of its strategic objectives. It also must be based on objective and verifiable assessments, without being influenced by the expectation of personal benefits, whether direct or indirect. In order to ensure the full implementation of such principle, each member of the organization commits to avoid situations that may constitute conflicts of interest that could compromise his/her ability to decide for the exclusive benefit of the Association and in an impartial and independent way. For this purpose, it must be used the system of precautions and rules made available by COSPE to identify the existence and / or risk of conflict of interest in the procedures adopted for the selection of personnel, supplies and services.

It is mandatory for all who participate and collaborate in various ways in the life and activities

of the Association to report situations of potential or outstanding conflict to the management bodies and to the Presidency, for appropriate assessments and decisions on the matter.

2.5 Health and Safety Protection

For what concerns the risk of crimes, the protection of individual health and safety, as well as of public safety, COSPE commits to ensure that the position held by any operator or volunteer is carried out in compliance both with the international agreements and standards, and with the laws and regulations of the Countries in which it operates. In this framework, each operator is responsible for the implementation of appropriate conducts and of the necessary prophylaxis and therapies that assure health and safety both for them and for others, scrupulously adhering to the regulations defined by COSPE both at central level as well as in each Country.

2.6 - Use of goods and tools

Operators must guarantee protection and conservation of the tangible and intangible assets made available by COSPE, as part of the Organization's assets. The use of these goods by the operators is exclusively regulated for the purpose of carrying out the organizational activities of the and for the purposes authorized in the individual offices.

2.7 - Use and protection of data

COSPE ensures that the data and information in its possession are confidential and not accessible from the outside, in compliance with the legal regulations on privacy. Therefore, operators may not disclose to third parties information regarding the organization's technical, structural and financial knowledge, as well as all other confidential information, except when such disclosure is required by law or other internal provisions.

2.8 - Protection of intellectual asset

COSPE promotes researching, planning and creativity through all its operators, each within their own function. This activity is the fundamental value and asset of the organization and everyone must contribute to its development and safeguarding in order to ensure its proprietorship, protection, promotion, diffusion and valorisation.

2.9 - Political pluralism

COSPE does not interfere in the political choices of its members and operators. At this regard, the principles of respect for individual freedom and openness to dialogue with different cultures, of which the choices of individuals are an expression, are applied. At the same time, COSPE demands conducts that do not jeopardize the pluralism of the Association, scrupulously avoiding any act or situation that could compromise its nature and image of a non-party entity.

2.10 - Environmental protection

COSPE undertakes to promote within its offices, in its procedures and among its staff and partners, an ecological conversion of its structures, management systems, practices and conduct of members, partners and operators, with the aim of reducing the CO2 emissions and the environmental footprint of the Association itself and of its activities. COSPE requires that organizations, institutions and companies with which it establishes partnerships in performing its activities, strictly comply with the standards set by International Conventions and Treaties on environmental protection.

2.11 - Anti-discriminatory and anti-sexist relations

COSPE undertakes to establish and disseminate in all its instances and at all levels, from language to behaviour, forms of expression and practices that favour the consolidation of relations marked by an anti-discriminatory and anti-sexist culture.

2.12 - Protection of minors

COSPE adopts the principles established by the UN Convention on the Rights of the Child (CRC) adopted by the UN General Assembly on November 20th, 1989. The Association, in implementing the abovementioned principles, aims at improving the way in which the world addresses children, in order to obtain immediate and lasting changes in their lives, so that the right to survival, protection, development and participation is guaranteed to every child (for further details and details see the Annex "*COSPE: Code of Ethics for the protection of girls, children, adolescents*").

2.13 - Equal opportunities and treatment

COSPE guarantees compliance with the principles of impartiality and non-discrimination towards all people involved in organizing, managing and carrying out its activities. To that end, the governing and management bodies, all members and staff undertake to guarantee uniformity of treatment and equal opportunities regardless of gender, age, ethnic group, nationality, religion, sexual orientation, disability, and also ensure to act objectively without favoritism due to kinship or affinity of any kind.

2.14 - Respect for personal integrity.

COSPE requires respect for the person, his/her dignity and physical and mental integrity in all the relations involving its governing and governing bodies, its associative base and its staff. In Italy and in the countries where the Association operates, no person should be placed in a state of subjection through violence, whether physical or psychological, threat, deceit, abuse of authority and power, abuse of a situation of economic, physical or mental inferiority or in situation of necessity. Conducts of this type will be prosecuted with determination and rigor in every circumstances and context, with particular attention to those situations relating to the sexual sphere, where no form of harassment or conduct that not comply with the criteria of correctness and respect consistent with the values of the Association will be tolerated, in accordance also with the Inter - Agency Standing Committee's Six Core Principles Relating to SEA.

COSPE is committed as well to prevent and punish any conduct that may constitute moral coercion and/or psychological persecution aimed at causing offense to the personality and dignity of employees.

2.15 - Use of alcohol and drugs

It is absolutely forbidden for COSPE operators to work under the influence of drugs, alcohol, psychotropic substances and, more generally, all substances that are illegal in the Country in which they operate. None of these substances are allowed in the organization's offices and facilities.

3 - RELATIONS WITH THIRD PARTIES

3.1. Relations with beneficiaries

COSPE undertakes to share the vision, mission and ethical values and principles inspiring this

Code with all the economic, social and institutional entities involved in any capacity in the initiatives promoted by the Association.

It also commits to include each subject involved in its projects' activities in all phases of the project's cycle, both in the planning of the actions and in the monitoring and evaluating phases, ensuring timely and transparent information on the activities and results.

3.2 - Relations with Partners

As part of its activities and in pursuit of its strategic objectives, COSPE establishes collaborative relations and alliances with international, national and local partners - whether public or private - that entail both political and financial aspects,

The choice of partners is based on the following criteria:

- sharing and acceptance of the organization's principles, norms and mission **stated** in this Code of ethics and conduct;
- independence from political parties or governments

Local public partners must guarantee freedom and autonomy of decision with respect to the purposes and objectives of COSPE's specific intervention and action, within the framework and the limits of the agreements established during the planning and start-up phases.

Likewise, COSPE rejects collaborations with partners involved in publicly known scandals or corruption practices.

3.3 - Relations with lenders and donors

For the realization of its projects and institutional activity, COSPE establishes relations and commitments with various public or private donors, which must be based on correctness and transparency. Private companies wishing to finance projects or actions promoted by the Association are required to respect human rights, workers' rights and environmental protection, preferably attested by practices or codes of social responsibility or internationally recognized certifications. Particular attention will be paid to the principles of protection of minors, equal opportunities, equal treatment and respect for personal integrity stated in this Code of Ethics and Conduct.

The Association refuses donations of both materials and money from companies that produce or trade armaments, pornographic materials and any other matter deemed offensive to the human person and to the environment.

Likewise, COSPE refuses donations from entities involved in publicly known scandals or corruption practices (see the Annex "*Self-Regulation Code for private research and fund-raising activities*")

3.4. - Relations with suppliers

When purchasing goods, materials, equipment or services for its activities and projects, in compliance with good quality standards, COSPE will favor operators of the countries in which it operates. The choice of suppliers and the purchase of goods, works and services is carried out in accordance with the internal procedures and ISO 9001 principles, or in compliance with the contractual commitments established by funders, if more restrictive.

The knowledge and acceptance by the suppliers of COSPE's Code of Ethics and Conduct, as well as the proven respect of human rights, labor rights and environmental protection, with particular attention to the principles of protection of minors, equal opportunities and equal treatment, respect for personal integrity stated in this Code, are a precondition for the stipulation of each contract. The internal procedure for the purchase of goods and services includes the ethical standards' set of rules suppliers are required to comply with.

3.5 - Relations with the media

The organization's external communications must be truthful, complete, accurate and verifiable. Relations with the media are carried out by the staff designated by the management bodies, who will have to comply with the norms established by the organization in its procedures. If information about COSPE's objectives, results, points of view are requested externally, operators are required to obtain authorization from their directors, as well as to agree on the contents with the competent department. Participation to committees, networks, campaigns, other associations of any kind in representation or in the name of COSPE, must also be duly authorized in writing by the competent management body.

3.6 - Relations with the entities in charge of control and revision

Relations with entities or individuals in charge of conducting auditing activities must be based on principles of integrity, promptness, correctness and transparency. Maximum collaboration must be given by all staff to these operators. It is therefore forbidden to conceal information, provide false documentation or state untrue facts, or in any case prevent and/or hinder the

implementation of control or audit activities.

4. CODE MANAGEMENT

4.1. Dissemination of the code

This Code of Ethics and Conduct is published on the website www.cospe.org and is directly brought to knowledge:

- to all who are associated and/or have a working relation with COSPE in Italy and in all the countries in which the Association operates and is present;
- to individuals, organizations, companies and third-party institutions with whom COSPE establishes relations, for any reason and for any purpose.

A declaration attesting the knowledge and acceptance of this Code of Ethics and its rules must be signed by every person when requesting membership to COSPE, or signing a collaboration and/or a work contract.

This Code of Ethics and Conduct is accessible and available to all those requesting it, in all COSPE's offices, in Italy and in the countries in which the organization operates, with the indication of which persons, management, governance and supervisory bodies to contact to report cases of infringement and violation.

COSPE's Governing Council and the Directorate General are guarantors and responsible for the dissemination and knowledge of the Code of Ethics and Conduct.

4.2. Control and application of the code

*For the control and application of the Code of Ethics and Conduct the **Controlling Body** is competent, provided for by the art. 30 of the Dlgs 117/2017. The **Controlling Body**, disciplined by art. 23 of the COSPE Statutes, *has among its functions that of* supervising the observance of the law, the statutes and the internal regulations, including the Code of Ethics and Conduct, and the respect of the principles of correct administration, also with reference to the provisions of the Legislative Decree of 8 June 2001, no. 231, if applicable, as well as the adequacy of the organisational, administrative and accounting structure and its concrete functioning.*

In particular, with regard to the Code of Ethics, the tasks of the Controlling Body are:

- a. to ensure the effective adherence to the principles contained in the Code of Ethics by employees, members of the Board of Directors, partners and associates;
- b. ensure compliance with the rules set out in the code for relations with beneficiaries, partners, suppliers, donors;
- c. receiving reports of possible violations of the Code, assessing their merits, and submitting conclusions to the management bodies.

Each member and/or collaborator has the obligation and duty to report any suspected breach and violation of the Code by other members, collaborators, beneficiaries, partners, suppliers and donors. This reporting obligation extends *to all subjects with whom Cospe has relations*.

If the suspected breach of the Code constitutes a case:

- of child abuse (Art. 2.12 Protection of minors);
- discrimination based on gender, age, ethnic group, nationality, religion, sexual orientation, disability (Art. 2.13 equal opportunities and treatment);
- physical or moral violence, abuse of authority and power or abuse of a situation of economic, physical or mental inferiority or of a situation of need, harassment and sexual harassment (Article 2.14, respect for personal integrity);

Cospe shall ensure that the victim of such conduct is facilitated and protected not only with respect to the internal reporting procedure provided for in this point, but also in case the victim wishes to take legal action.

Those who have been obstructive or negligent or have caused delays in reporting suspected breaches and violations of the Code to the Controlling Body shall be reported through this same reporting and handling procedure.

The procedure for reporting and handling suspected infringements and violations of the Code will be developed according to the following steps:

Phase of **reporting** suspected infringement and violation of the Code:

- the suspected infringement and violation is reported to the country representatives and the Human Resources Manager of Cospe
- the latter, if they find that the suspected infringement and violation is well-founded or that the case is not easily and promptly resolved, will report directly to the Control Body, by email to the appropriate e-mail address organodicontrollo@cospe.org

- If a subject (partner, financier, etc.) external to Cospe reports or in cases of: a) lack of or untimely answer; b) reasons that may affect the impartiality of the Country representatives c) answer that is not considered full, exhaustive or satisfactory, the suspected infringement and violation shall be directly reported to the Controlling Body through an e-mail to the appropriate e-mail address.

Investigation phase:

Following the report received, a preliminary investigation will be opened, coordinated by the Controlling Body with the collaboration of the Management bodies. The results of the investigation will be sent to the Executive Board.

Report management/decision phase:

The Controlling Body, in case of ascertainment of non-compliance with and violation of the principles and rules established by the Code of Ethics and Conduct, will define the decisions to be taken, both in terms of corrective measures and sanctions, taking into account the seriousness of the charges. The measures taken may also include initiatives in favour of any victims of the infringements committed, such as partial or total coverage of legal costs.

Reporting phase:

The Controlling Body shall draw up a report which shall be forwarded to the Management, to the Board of Directors, and to those directly concerned, in compliance with the protection of the privacy of the persons involved and in accordance with the criteria and provisions of this Code and of the laws in force.