



Code of Ethics

**Humanitarian and Development Non-Governmental Organization
(HDNGO)**

Executive Team
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Contents

Introduction	2
Ethical Code recipients and application area.....	3
Conformity to existing laws and regulations	3
Principles of probity and impartiality	3
Donor relations	3
Partner relations	4
Supplier relations	4
Press and mass media relations.....	4
Relations with control and auditing bodies (supervisory body, auditors, Internal Audit).....	5
Relations with the Judiciary	5
Privacy.....	5
The use and protection of data.....	5
Corporate governance	5
Control systems	5
Human Resources	6
Employment of the Organization's assets and/or other donor assets	7
Specifically:.....	8
Conflict of interest	8
Final provisions and implementation	9
Communication and education initiatives	9
Notification of Code infraction	9
Consequences deriving from a Code infraction.....	9
Conformity to the Code's restrictions.....	9

Introduction

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 HDNGO operators, collaborators, partners, advisers and members of the statutory bodies to which it is addressed.

The HDNGO 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 organization: humanitarian relief, neutrality, impartiality, independence, non-discrimination, transparency. In particular, with reference to the Values Charter itself:

HDNGO believes in focusing 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:

- HDNGO 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.
- HDNGO 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 HDNGO from identifying any individual or institutional responsibility for single catastrophic events that are either natural or man-made, or from taking a public stance.
- HDNGO 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.
- HDNGO humanitarian action is expressed by methodologies and behaviors attentive to local cultural and religious settings.
- HDNGO 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.
- HDNGO 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.
- HDNGO 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 behavior of the following recipients:

members of statutory bodies, operators, partners, advisers and all who pursue the Organization's objectives (Recipients from here on). Recipients' behavior must safeguard the Organization's respectability, image and assets. Code values and principles must first be applied by top management in their operations both inside and outside the Organization, 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 Organization, management and control model (Model from here on) or to the Organization's Regulations and Procedures disciplining specific activities.

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 Organization 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 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 Afghan and foreign public administrations. 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 Organization to safeguard human rights, worker rights and the environment.

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

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

- Non-profit organization
- Independence from any imperium or ideology
- Action in line with the organization's own ethical principles

- concurrence with the Ethical Code.

Supplier relations

The Organization privileges the procurement of goods, tasks or services for cooperation and humanitarian relief from technical and economic sources in the provinces 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 Organization's Model and Operations Manuals

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

The Organization 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 behavior otherwise damages the Organization's image in carrying out activities on account of and/or in lieu of the Organization.

Press and mass media relations

The Organization 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 Organization'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 Organization 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 Organization exclusively for the due purposes of their tasks. Consequently, Recipients are obliged not to reveal to third parties any data concerning the Organization's technical, organizational 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 Organization 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 Organization adopts a Corporate Governance system of regulations and procedures, which set the guidelines for the forthright and responsible behavior 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.

Control systems

The Organization's quality and effectiveness is a primary objective to be achieved by means of controls put in place starting from its organization 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 Organization's quality, efficiency and effectiveness. Internal control comprises any necessary or useful tool to address, support, improve and check the Organization's activities with a view to ensuring conformity to the law, the Model and Procedures, so as to safeguard the

Organization's assets, manage its activities with maximum efficiency and provide accurate and complete accounts and financial data. Ethical Code - 4 The realization of an effective internal control system must constitute a common commitment at every organizational 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.

Human Resources

The Organization considers human resources in Kandahar and other Provinces of operation a fundamental element. Operators' dedication and professionalism are essential values and prerequisites for the achievement of the Organization's purposes and objectives. Consequently, the Organization endeavors 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 Organization adheres to the principles of the Universal Declaration of Human Rights the Convention on the Right of the Child and the Convention on the Elimination of All Forms of Discrimination Against Women. The Organization endeavors 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 Organization endeavors to ensure: - an adequate and functional working environment for its activities; - a frank, collaborative and communicative context; - a suitable behavioral context to promote the distribution and knowledge of the Organization's objectives and to extend a positive influence on people's quality of life; - the recognition and valorization 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 organization.

- 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 behavior 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.

Ethical Code - 5 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 Organization'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 behavior and apparel considerate of colleagues, partners, uses, local cultures and confessions and which constantly reflect the dignity of his/her role, in line with the organization'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 organization, even if to its image.
- Adopt a behavior, 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 Organization's behavioral guidelines and proscriptions are defined in the Model and adopted by the internal Protocols and Procedures.

Employment of the Organization'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 Organization's assets. The employment of these assets by practitioners must consequently be functional and exclusive to the organization'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 programs 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 authorized.
- 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 Organization's website.

Conflict of interest

Any decision regarding the Organization's policies (procurement contracts, partnerships, personnel selection, etc.) must be taken in consideration of the Organization'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 organization or same sector operators.
- Work provided to third parties, unless previously authorized by the organization, 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 favors from third parties for advice or services rendered in connection to their relations with the Organization. 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 Organization 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 Organization's assets and image.

The Organization 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 12 Feb 2022. 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.

Regards

Executive Team
HDNGO