



CODE OF ETHICS

(ORGANISATION, MANAGEMENT AND CONTROL MODEL *pursuant to Legislative Decree 231/2001*)

*approved by the BoD of
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Mission

CELIM – Centro Laici per le Missioni – is a Non-Governmental Organisation founded in 1954, registered in the list of Civil Society Organisations (OSC) of the Italian Agency for Development Cooperation (AICS) and recognised by the European Union.

In carrying out its activities as an Association operating in the sector of international cooperation and development education, with the purpose of promoting social, cultural, political, environmental and economic conditions for the complete fulfilment of every person, CELIM takes inspiration from the evangelical teachings and the values and principles expressed in Elewitt's charter of European NGOs.

CELIM adheres to the Ethical Charter of the Italian Associations of international cooperation and solidarity and has defined a Code of conduct that adopts the directions set forth in the Charter.

To complete such documentation for the purpose of meeting the requirements specified by Legislative Decree 231/2001, in 2019 CELIM set out the organisation and Control Model.

In 2020 CELIM decided to bring together the two documents in what was named CODE OF ETHICS.

CELIM is committed to promoting awareness of this document and monitoring its compliance.

Employees and aid-workers must be aware of this document and must sign to confirm the receipt and reading thereof.

Purpose of the Code of Ethics and scope of application

This Code of Ethics collects and gathers the principles, values and rules that guide CELIM's activity and the conduct of its members, volunteers, aid-workers, administrators, employees and aid-workers both in Italy and abroad.

The provisions of this Code supplement those of the 'Code of Ethics and Behaviour' of the Italian Agency for Development Cooperation, available on the website www.aics.gov.it, which applies to and covers any matters not expressly provided for in this Code.

The provisions of this Code also integrate those of the 'Code of conduct for the prevention and contrast of sexual harassment, abuse and exploitation for the protection of the dignity of the beneficiaries of development cooperation interventions and of the people who work and operate in the structures of the Italian Agency for Development Cooperation and with the Agency itself' (PSEAH Code – Protection from Sexual Exploitation, Abuse and Harassment'), available on the website www.aics.gov.it, which applies and extends to any matters not expressly provided for by this Code.

The strength of this Code lies mainly in the awareness of these rules' value and in the sharing by its intended recipients of the constitutional ethical principles of diligence, loyalty, impartiality and care for the general interests of the community.

The Code of Ethics sets out the principles, values and rules of conduct, also in order to prevent any risks of liability and offences to which CELIM staff may be exposed while carrying out the activities related to the Association's mission.

1. General principles and behaviour criteria

This Code of Ethics expresses the ways in which the core values are translated into practice in the management of activities and relations with the stakeholders.

CELIM adopts the following general principles on which its action of international volunteering and development cooperation is based:

- working so that every person becomes the protagonist of his/her own history, as well as the progress, not only economic, of the community in which s/he lives, becoming an active and responsible subject of democracy and peace;
- in the countries object of intervention CELIM acts to ensure the respect and promotion of the fundamental rights of individuals and populations, enhancing local human resources, promoting cultural and social growth and prioritising the achievement of self-sufficiency through the improvement of family and community economies at all levels;
- CELIM promotes any suitable awareness-raising and information action for the diffusion of education to global citizenship and solidarity, for the prevention of xenophobia, hatred and racism, and for the activation of social inclusion paths for migrants.

In line with these general principles, CELIM adheres to the following behavioural criteria:

- **Legality**

CELIM subordinates its action to the principle of legality and undertakes to comply with the applicable national, supranational and international legislation;

- **Honesty, fairness and moral integrity**

The behaviour of CELIM operators must be based on criteria of correctness, collaboration, loyalty and morality in every area.

- **Impartiality**

CELIM undertakes to guarantee full equal treatment for all persons involved in its activities, avoiding any kind of discrimination based on age, sex, state of health, nationality, political opinions, religious beliefs and sexual orientation. Particular attention is paid to the enhancement of the female operators and beneficiaries.

- **Responsible behaviour**

Relations between employees, aid-workers and volunteers must take place according to the principles of education, collaboration, transparency, trust and moral integrity.

CELIM objects to and punishes any form of harassment, including sexual harassment.

- **Privacy policy**

Any data acquired is processed exclusively for the purposes pertaining to the exercising of the Entity's business. Everyone is required to protect data confidentiality and to observe the obligations established by the EU Regulation 2016/679 GDPR on data protection.

- **Fairness and transparency**

Transactions and operations have a documented record to allow the decision-making process to be verified. All donations and income in favour of CEILM are documented to guarantee the accuracy of the amounts and the traceability to the person who made the payment, without prejudice to the right to privacy. All expenses must be documented to report the activities carried out accurately to stakeholders, donors and civil society.

- **Anti-money laundering caution**

CELIM does not encourage any behaviour that may involve the laundering of money from illegal activities and undertakes to comply with all national and international anti-money laundering regulations.

2. Governance

- Within the association is available and is known an organisation chart that reflects its current organisation and is functional to its operations (*see organisational chart*).
- Decision-making, operational and control tasks are clearly separated:
 - o the articles of association provide for a Board of Governors elected by the Shareholders' Meeting, which is of a voluntary nature and independent of the operating structure;
 - o to guarantee the absence of conflicts of interest and the independence between decisions and operations, employees and aid-workers cannot be elected to the Board of Governors;
 - o the general administrative control and that of individual projects are carried out by an external auditing firm.
(*see articles of association, book of board minutes, financial statements and project auditing*)
- An annual program is drawn up for the main initiatives to be undertaken, which are defined in order to achieve the organisation's goals.
- The results achieved with respect to any planned initiatives are available in a formal report, so as to allow an evaluation of the effectiveness and efficiency of the organisational management.

3. Management of financial resources

3.1 The control system

To ensure compliance with laws and Procedures, the Organisation has developed a control system with the purpose of protecting the organisation and its assets, managing activities with maximum efficiency, effectiveness and quality and providing accurate and complete accounting and financial data.

Internal control is aimed at achieving the organisation's objectives, as well as preventing offences or even just conducts that may lead to offences.

Creating an internal control system supported by clear and known procedures is a joint commitment at every level of the organisational structure; consequently, all aid-workers must, within the scope of the functions they perform, implement the controls they are responsible for, reporting to the competent function any shortcoming and indications aimed at improving the internal control system. Within the Organisation, it is the Director's responsibility to verify that the internal monitoring functions are correctly implemented, and in the fulfilment of his mandate s/he has no restrictions or limits on access to company data, archives and assets; furthermore, s/he has the duty to bring to the attention of the Board of Governors any proposals regarding possible improvements to risk management policies, measurement tools and existing procedures, regularly providing information on the outcomes of his/her activities and on any anomalies found.

3.2 Accounting records and financial statements, prospectuses and similar documents

The Organisation complies with the laws applicable to the preparation of financial statements and adopts all types of administrative-accounting documentation required by law, as well as prospectuses (financial statements) required for lenders.

The Organisation's accounting is based on accounting principles that are universally recognised and regulated by law; its annual financial statements are subject to certification by the independent auditing firm appointed. The Organisation's information and data provided to third parties, as well as the accounting records of its management-related issues guarantee truthfulness, transparency, clarity, accuracy and completeness. This results in truthful and correct information on its economic, asset and financial situation.

All operators must comply with the accounting procedures defined by CELIM, according to which

adequate supporting documentation must be kept for each transaction-related accounting entry. Said supporting documentation must be easily accessible and filed in accordance with the provisions of the same procedures in order to facilitate consultation also by any internal and external bodies authorized to audit.

As part of their duties, staff must ensure the highest possible level of transparency and traceability of accounting operations.

4. Management of Human Resources

4.1 Selection and training

Human resources, both in Italy and in the countries of operation, are considered a key element for the Organisation. The operators' dedication and professionalism are key values and conditions for the achievement of the Organisation's goals and objectives.

The Organisation therefore undertakes to develop its operators' skills so that each of them can express their potential to the best of their abilities.

In this regard it offers all operators the same professional growth opportunities, ensuring that they can all enjoy fair treatment, based on merit criteria, with no discrimination on grounds of sex, age, disability, religion, nationality and political and trade union opinions.

When choosing operators destined for foreign offices, the Organisation undertakes to have due regard for the country's specific situations, to always guarantee the maximum possible safety. The Organisation will select people who share CELIM's spirit and mission and who comply with the requisites, the professionalism and the characteristics suited to the required role, with no discrimination and with transparent procedures.

Employees are given adequate support and training based on the professional needs required by the employee's role.

4.2 CELIM's commitments

CELIM undertakes to ensure:

- compliance with the applicable Italian legislation and the host country's legislation;
- an adequate and functional work environment with respect to the activity to be performed;
- a frank, collaborative and communicative relational context that can positively influence the quality of the work environment;
- a behaviour that promotes the diffusion and knowledge of the objectives pursued by the Organisation;
- the recognition and enhancement of the skills and contributions of everyone for the achievement of common goals;
- an adequate and transparent circulation of information, functional to the regular performance of work and pertaining to work organisation;
- a thorough data protection;
- an adequate prevention and, if applicable, a balanced management of any conflict between aid-workers;
- a constant willingness to listen to those believing to be the object of actions or behaviours that are not consistent with the above-specified principles;
- adequate information on the living and safety conditions of the operator's countries of employment, as well as on any preventive healthcare practices that must be complied with, while respecting each person's personal care choices;
- remuneration proportionate to the levels of responsibility and professionalism in the various roles of the organisation.

Upon commencement of an employment relationship, each employee will be provided with the necessary information:

- on the function and duties s/he is required to perform;
- on the regulatory and remuneration elements applicable to the type of employment contract put in place;
- on the procedures and rules that need to be adopted for the work activity to be performed in the maximum possible safety.¹

4.3 Operator's obligations

CELIM's operators are required to be aware of the principles of this document as well as the relevant reference procedure regulating their functions and responsibilities.

Operators are required to:

- refrain from any conduct that is not complying with the principles, contents and procedures herein;
- carefully select, within their area of responsibility, their aid-workers and regularly guide them towards full compliance with this document;
- ascertain that any third parties with whom CELIM's operators come into contact have read this document;
- promptly report to their contacts or to the Supervisory Body any findings or information from the Stakeholders about possible cases or requests of violation of the rules contained in this document;
- collaborate with the Management in verifying possible violations;
- promptly take immediate corrective measures when required by the situation and, in any case, prevent any type of retaliation;
- maintain the utmost confidentiality regarding any fact, information and documentation produced or of which they have become aware in the performance of their duties;
- make a correct use of the association's economic and financial resources and material assets, and maintain a sober style in the course of their activities;
- demonstrate a collaborative spirit and a flexible adaptation to the organisation's operational requirements;
- maintain transparency and correctness in relations with third parties, avoiding any form of corruption;
- donate to CELIM any income, net of any taxes, from activities arising from their working relationship with CELIM (teaching, consultancy, publications, ...);
- carry out their duties with the utmost respect for the law and for different cultures;
- refrain from disrespectful behaviour towards institutions, partners and staff;
- take an active part in promoting the organisation and its activities.

As well as complying with the law, CELIM's operators must also respect ethics and human rights, and this will manifest itself in an even stricter conduct than that envisaged by the law.

Here follows an additional non-exhaustive list of operators' obligations:

Compliance with laws and regulations

As part of their activities, operators undertake to adopt any prevention and control measure aimed at ensuring compliance with the laws in force in the country where they operate and with internal procedures and regulations in every geographical context and at all decision-making and executive levels.

Should they become aware of any omission, falsification or negligence with regards to the accounting or the documentation on which the accounting records are based, CELIM's operators are required to report the facts to their contact person in compliance with the procedures established by the regulations.

¹Following the correct prophylaxis and implementing the necessary therapies to ensure their health remains the responsibility of individual operators.

Non-discrimination

Operators are required to respect the fundamental human rights, with no discrimination whatsoever and with particular reference to the rights of children; they are also required to respect the culture, religious beliefs and dignity of others.

In their relationships with the subjects with whom they work, operators must avoid any discrimination on grounds of sex, state of health, age, nationality, political and religious orientation.

Hiring of minors

The hiring of minors in the project activities must be assessed based on the rights and laws of the country in question.

Mobbing and Stalking

Operators are prohibited from entertaining behaviours that could take the form of moral violence and/or psychological persecution aimed at causing offence to the dignity and psychophysical integrity of subordinate operators or deteriorating the work environment.

In internal and external working relationships, no one must be put in a state of subjection through violence, threats, abuse of authority, offences and aggressions, be they physical or verbal, favouritism or sexual blackmail. Any form of harassment, including sexual, is expressly forbidden.

Sexual exploitation

Engaging in or soliciting sexual relations with the beneficiaries of the projects is forbidden. Relationships between project/organisation staff and beneficiaries are discouraged wherever they generate unequal power dynamics. The exchange of money, favours, gifts, employment or promises of employment in return for sexual services is prohibited.

Sexual relations with minors

Entertaining relations of a sexual nature with minors is forbidden.

Use of Psychotropic Substances

CELIM's operators must refrain from using drugs, psychotropic substances and more generally any substances that are illegal in the country in which they operate. No such substances are permitted in CELIM's offices and communal facilities. CELIM's operators must never work under the influence of alcohol: its consumption outside working hours is the responsibility of each individual operator, who must take into account the rules regulating its consumption in the country where s/he is working.

Safety

Any behaviours that do or could jeopardise one's health or safety or those of third parties must be avoided.

Safety is the responsibility of each CELIM operator who must promote safety by observing the organisation's procedures and following the provisions in force in the country in question.

Involvement in Military Operations and Political Activities

Operators are prohibited from engaging in military operations and political activities that disrupt public order. More generally, operators are prohibited from taking part in the political life of the foreign country in which they operate.

Italy-based operators are prohibited from using their role in CELIM in support of political parties.

Operators with representative roles must inform CELIM's Board of Governors of any assumption of office within a party, as this can be deemed to be in conflict with the responsibility and the role that they have taken on.

Use of the organisation's tools

Operators must:

- keep the personal computer and related programmes and applications in an appropriate manner and return the same with all the data and information relating to the work performed.

Such data and information must be delivered in an orderly and recognisable manner;

- use *internet* browsing to visit sites related to the performance of their work activity and, unless explicitly authorized, must not participate in forums or *internet chat lines*;
- use their e-mail address only for reasons pertaining to the performance of the assigned duties; in particular, sending or saving messages of an abusive or sexual nature is prohibited;
- use, install and run software and other material protected by law only following specific authorisation;
- in case of use of notebooks or laptops supplied also outside office hours, operators are required to create an additional account for the management of private data (mail, web surfing, internet).

Representation and protection of the organisation's image

CELIM's operators at all levels will represent the organisation with the public, governments, funders, partner organisations and beneficiaries with a professional and courteous behaviour. Behaviours that may damage the organisation, even only in terms of image, must be avoided.

Operators must remember that, to a certain extent, they always represent the Organisation, even during non-working hours. For this reason, the operators' private life must not be in evident contradiction with CELIM's mandate and principles and must be adapted to the context in which they are.

Operators are also required to behave and dress respectfully of colleagues, partners, customs, cultures and local confessions.

Unauthorized compensation

Operators are not authorized to receive or accept any compensation, gift or other types of payment and benefit from persons or entities that may benefit from the programmes managed by CELIM (for example: partners or potential partners, beneficiaries, counterparts of governments, supplier companies of goods and services). The acceptance of unauthorised compensation may result in the termination of the contract.

Publications

Operators intending to publish articles or other documents on the activities of the programmes managed by CELIM externally must request an authorisation from the Country Representative and/or the head office. All reports, manuals, training modules and other documents prepared by any CELIM's operator in the performance of their duties are the property of CELIM. Any innovation or device conceived, created and developed or realised both individually and with the support of others is to be considered the property of the Organisation.

4.4 Breach of the rules

Any breach by aid-workers of the principles and provisions contained in this document must be promptly reported to the Management in writing.

Any report of breach will only be considered if there is sufficient information to identify the terms of said breach and allow an appropriate investigation to be carried out by the competent functions.

If after reporting a possible breach the addressees believe that they have been retaliated against, they should contact the Board of Governors directly, without prejudice to the fact that they will not be able to conduct personal investigations or report the news to anyone other than the Management.

The Organisation will act to protect informants against any form of retaliation, discrimination or penalisation, and will also ensure the confidentiality of their identity, without prejudice to any legal obligations and protection of the rights of persons wrongly accused and/or accused in bad faith (ref. 8 Whistleblowing).

4.5 Protection of health, safety and the environment, public safety

In Italy CELIM operates in compliance with the current legislation and with all the requirements

provided for by the law. It protects the health of staff in accordance with Decree Law 81/2008; its risk assessment document is drawn up in compliance with the standard procedures referred to in Decree Law of 30/11/2012, updated at 5/11/2021; it has an RSPP (Health and Safety Officer), an RLS (Workers' Health and Safety Representative), workers in charge of fire prevention, first aid workers and up-to-date firefighting and first aid medical equipment.

Abroad, CELIM is mindful of the fact that the activities carried out by its operators must comply with international agreements and standards and with the laws, regulations, administrative practices and national policies of the countries that are the object of its activities.

This applies particularly to the protection of the health and safety of workers, the environment and the public.

CELIM asks operators to play an active role in the process of risk prevention, environmental protection, public safety, as well as protection of health and safety towards oneself, colleagues and third parties, also by following, as part of their duties, the procedures underwritten at the time of taking on the assignment, always bearing in mind the particularly complex situations that may arise when operating in critical environments, characterised by unavoidable and unpredictable dangerous conditions (such as force majeure).

5. Management of assets and information

5.1 Use of the Organisation's assets

All operators are provided with tangible and intangible assets such as computers, printers, equipment, cars, software and know-how relating to activities, strategic and economic-financial business plans.

Protecting and keeping these assets constitutes a fundamental value for the protection of the organisation's assets. The use of these assets by the operators will therefore be exclusively functional to the performance of the organisation's activities and for the purposes authorised by the specific functions.

5.2 Protection of information (privacy)

The organisation ensures the confidentiality of the information in its possession and refrains from seeking confidential data, unless expressly authorised by the interested parties and, in any case, always in compliance with legal regulations.

CELIM respects the Privacy in accordance with the GDPR 679/2016, and on 27/9/2018 the Organisation drew up: the DPIA (Data Protection Impact Assessment), the Record of the processing of personal and particular data and the Manual for use by data processors.

CELIM ensures that its aid-workers use any confidential information acquired by reason of their relationship with the Organisation exclusively for the purposes connected with the exercise of their duties.

To ensure maximum confidentiality, the Organisation guarantees a high level of security in the selection and use of the information technology systems it uses for the processing of personal data and confidential information, in accordance with the current provisions on privacy.

CELIM undertakes to adopt adequate and preventive security measures for all databases where personal data are collected and stored, to avoid the risk of destruction, loss, unauthorised access or processing.

CELIM's activities constantly require the acquisition, storage, processing, transmission and diffusion of news, documents and other data relating to negotiations, administrative procedures, financial transactions and know-how (contracts, projects, reports, notes, studies, photographs, software, etc.) which, due to contract agreements, cannot be disclosed outside of the Organisation or whose inappropriate or untimely disclosure could be detrimental to the Organisation.

Without prejudice to the transparency of the activities carried out and the information obligations imposed by law, operators must ensure the confidentiality required by the circumstances for each piece of information acquired in relation to their work function.

Operators are therefore required not to disclose to third parties any information concerning the technical, organisational and financial assets of the Organisation, as well as any other non-public information, except where such disclosure is specifically required by the law or by other internal provisions.

The Code recipients cannot in any case use the Organisation's inside information to their own advantage, nor can they disclose it in any way outside of the Organisation.

The Organisation promotes research and innovation activities carried out by all its operators as part of their role and duties. The intellectual result of these activities constitutes a central and essential asset, and all aid-workers are required to actively contribute to the production as well as the management and protection of these assets, so that they can be developed, protected and enhanced.

6. Managing relationships with third parties – Communication and partnership

6.1 Relations with donors

To implement its activities both in Italy and abroad, the organisation makes use of public and private funding.

Relations with donors are based on the utmost fairness and transparency. Transfers must be made to accounts in the name of CELIM. Payments to individual accounts are not allowed.

CELIM:

- provides truthful information on the projects for which funding is required and is open to talk with funders/donors to give them a better understanding of the projects;
- guarantees the implementation of a project in a manner that is consistent with the declared objectives and the project subscribed by the funders. CELIM's projects are carried out in accordance with codified methodologies and procedures; in the event of any changes, CELIM undertakes to notify the funders promptly through its information tools and – where required – to provide the necessary documentation;
- the project's development is clearly and transparently accounted for through periodic reports, as required by the funders. Even when specific reports are not required, CELIM still adopts its own reporting standard;
- while acknowledging donor contributions, CELIM maintains its independence from private or governmental interests. When accepting and implementing projects, no variations in the objectives, which are instrumental to the lenders' interests, are therefore admitted;
- undertakes to diversify the financing sources for projects through fundraising activities with public or private organisations and individual citizens to honour its mission as a vehicle of private resources also in public cooperation, promote its independence and autonomy and help the continuity of its activities.

When dealing with public donors both in Italy and abroad, giving, offering or promising money or other benefits or favours that can reasonably be interpreted as exceeding normal courtesy practices is strictly forbidden. Exerting unlawful pressure on public officials, public service officers, public administration executives, officers or employees, both Italian and foreign, or EU or international public bodies or their relatives or cohabitants is also forbidden.

When participating in tenders to obtain loans, contributions or funding from national, EU or international public entities, CELIM staff is required to, each according to their own skills, responsibilities and powers, sign, assess and submit genuine and truthful statements and/or documents.

Private companies wishing to participate in humanitarian projects, including through the supply of goods or services, are required by the organisation to respect human rights, workers' rights and the environment.

The organisation refuses donations of materials and money from companies producing or trading in weapons, pornographic material and anything else that is conceived to degrade human beings and the environment.

Any information relating to tax incentive opportunities for donors is provided through the website, periodical news, all information material and by including it in donation acknowledgements.

Fundraising messages are consistent with the actual allocations.

6.2 Relationship with partners

As part of its activities, CELIM promotes and encourages an active involvement of partners in the realisation of its activities and the pursuit of its goals and objectives.

The choice of partners (Bodies or Associations) is subject to the following criteria:

- they must be independent from national or international parties;
- their actions must be based on the same ethical principles as the Organisation's.

CELIM does not accept interdependence relationships with profit-making entities, nor any connection whatsoever with their interests.

Local partners may also be public entities as long as they guarantee CELIM freedom of movement and decision with respect to the stated objectives and purposes.

CELIM encourages the emergence of local organisations by enhancing and developing the skills and competences of individuals and communities, also with the aim of providing continuity to humanitarian action.

With respect to international partners, CELIM chooses partners on the basis of skills and reliability and asks that the principles set out in the Charter of European NGOs and the organisation's operational methodologies and aims be shared.

In the relationship with partners, CELIM:

- requires that the organisation's operational methodologies and objectives be shared;
- favours partnerships with organisations with which it has built first-hand knowledge, having verified their affinity and sharing with its own aims of cooperation and project objectives.
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In particular, in its relationship with the partners of the countries in which it operates, CELIM:

- intends to build lasting relationships with the key players of a community, based on actual needs and on the sustainability of the projects carried out;
- undertakes to offer training and develop the skills of the local partners and organisations with which it collaborates. CELIM implements its cooperation programmes with the aim of encouraging the direct management of activities and resources by the partners, according to their abilities, by supporting and promoting their growth and development, while maintaining direct responsibility towards donors;
- in the event that local partners are able to propose development initiatives, CELIM promotes the co-planning and co-management of its activities, always operating on the basis of the needs and requirements identified by the partners.

With regard to the beneficiaries, CELIM:

- undertakes to offer – in line with the objectives of its projects – the best service, of an adequate quality appropriate to the situation and the management skills;
- undertakes to guarantee access to the services implemented by the project to all potential beneficiaries, without discrimination;
- promotes the creation of groups of users/beneficiaries, who can express their opinion and provide feedback on the services provided as part of the project and on the quality of the same.

In relations with the institutions, CELIM:

- promotes dialogue with all institutions through direct relationships, attributing them a key player role for the achievement of its mission and for the development of international cooperation based on transparent rules and effective methods;
- intends to contribute to and participate in the formulation and development of intervention strategies in the field of cooperation, by providing its skills and experiences;
- operates by protecting its independence with respect to the choices of economic or political interest groups.

6.3 Relationships with suppliers

Depending on projects and sponsors, when selecting and managing suppliers, CELIM applies the procedures identified by local administrations, the European Union, the Italian state and CELIM itself; When purchasing goods, work or services for cooperation and humanitarian aid initiatives, the organisation gives preference to the technical and economic operators of the countries object of intervention, provided the required good quality is guaranteed.

The choice of suppliers and the purchase of goods, work and services are made based on objective assessments in compliance with competitiveness, quality, cost-effectiveness, price and integrity, which are the principles set out in and regulated by the procedures adopted by the Organisation.

When stipulating contracts with third parties, CELIM must inform them about the Code of Ethics adopted by CELIM itself, which all stakeholders are required to respect. The procedure for purchasing goods and services defines the methods by which suppliers are required to comply with ethical standards.

6.4 Relations with the press and other means of mass communication.

The success of CELIM programmes also depends on the relationships established with the media. CELIM operators can be vested with representative duties and, as such, must play a communication role.

Any material for diffusion, any contents of press releases and the signing of appeals must be agreed with the Communications Manager. The Organisation's Director and the Communications Manager are in charge of contacts with the media. The Communications Manager must be informed of any requests for interviews and comments made to members of the organisation.

Journalists sent by the Organisation to the projects or who in any case come into contact with its members must be welcomed and accompanied in their work in a transparent and professional manner. The Organisation's contacts with the press and mass communication organs are carried out through designated persons, who must operate with the utmost fairness, availability, prudence and transparency.

Any communication coming from the Organisation must be truthful, complete and verifiable, non-aggressive and respectful of the rights and dignity of the individual.

The use of images and communications that could harm people's dignity is prohibited.

If communication activities are entrusted to third parties, agreements must be drawn up to prevent message distortion.

The sources of information and images that are used by the Association are always under its control.

6.5 Participation in initiatives, events or external meetings

Participation in initiatives, events or external meetings is encouraged by CELIM, provided these are consistent with the performance of its work or professional activity. The following are regarded as such:

- taking part in conferences, congresses and seminars;
- drawing up articles, essays and publications in general;
- taking part in public events in general.

In this respect, any CELIM operators who are requested to illustrate or provide external data or news regarding CELIM's objectives, results and points of view, are required to comply with internal procedures, to obtain authorisation from their contact person and to agree on the content with the competent CELIM sector.

6.6 Relations with the persons in charge of control and auditing

Any relations with persons who carry out internal or external auditing and control must also be based on principles of integrity, timeliness, fairness and transparency. Full cooperation must be given to the same. Concealing information or providing false documentation or documents certifying things that are not true or in any case preventing or hindering the performance of any control or auditing activities by these subjects is also forbidden.

6.5 Relationships with Legal Authorities

Exerting pressure of any kind on the person in charge of making statements before the Judicial Authorities to induce said person to abstain from making statements or give false statements is prohibited.

All the Organisation's staff is required to provide the broadest cooperation in any investigation carried out by the competent Authorities.

7. Conflict of interest

7.1 General rules

Any situation that may constitute or give rise to a conflict of interest must be promptly reported to one's contact person, who will assess it and give the appropriate instructions. Furthermore, operators are not allowed to accept money or other favours from third parties for advice or services rendered in connection with their relationship with the Organisation.

7.2 Family relationships

Any decision relating to the Organisation's operations (supply contracts, partnerships, selection of personnel, etc.) must be consonant with the Organisation's aims; it must therefore be based on sound assessments and should never be dictated by direct or indirect personal interests or benefits. Situations such as those specified below by way of example will be carefully evaluated:

- entertaining relationships or open business negotiations with stakeholders who employ or are under the control of family members or habitual friends;
- holding, either directly or indirectly, any interest other than merely symbolic ones in companies that have or intend to entertain commercial relations with the Organisation or with subjects operating in the same sector.

7.3 External work activity

Operators are not allowed to work for or provide services to third parties in connection with the activities of the Organisation, unless previously communicated to their contact person, nor carry out activities that are in any case contrary to or incompatible with their official duties and with CELIM's objectives and image.

8. Whistleblowing

Whistleblowing procedures are specifically intended for all the organisation's entities, both in Italy and abroad, including the Board of Governors and any statutory and legal bodies, employees, aid-workers, volunteers, partners and beneficiaries of the projects. The organisation ensures that reporting verification activities are conducted in compliance with the applicable national and international laws. Each recipient of these procedures is required to report any conduct, risk and presumed wrongdoing or offence and other irregularities that may highlight a malfunctioning of the organisation, as well as damage the same, of which the whistleblower has become aware at their workplace and/or while performing their duties and/or while keeping relations with the organisation itself.

Reports may generally concern actions or omissions committed or attempted in conflict with the rules of the Code of Ethics and Legislative Decree 231/2001, including those that may damage the image and/or assets and/or employees, aid-workers and beneficiaries of the organisation's projects.

Anonymous reports will be considered only if they relate to events of particular gravity and must be

adequately and sufficiently detailed to bring out facts and situations that may be related to specific contexts.

As a general rule, all communications must be sent only to the organisation's Board of Governors, which will deal directly with the same whenever an act carried out in the interest or advantage of the organisation is reported and the details of the organisation's criminal liability are found, pursuant to Legislative Decree 231/2001.

Regardless of the reporting channel used, the whistleblower's identity is protected. All data is processed in accordance with the GDPR.

The organisation also provides against any act of retaliation or discrimination, either direct or indirect, against whistleblowers for reasons related, either directly or indirectly, to reports. Should any aid-worker or employee, or member of staff with a semi-subordinate or subordinate employment contract report in good faith and in the interest of the organisation's integrity any alleged relevant illegal conduct based on specific and consistent elements, of which they have become aware by reason of their employment relationship, said subjects cannot be sanctioned, demoted, dismissed, transferred or subjected to any other measure that may negatively affect, either directly or indirectly, their working conditions.

9. Respect for the environment and eco-sustainability

Within the limits of its budgetary resources, CELIM ensures that the organisation of its work and its activity respects the environment, particularly by promoting energy saving, paper-free offices and the recycling of renewable materials and by purchasing products that guarantee environmental sustainability.

All CELIM offices carry out the separate waste collection.

10. Breaches

Any established breach of the Code of Ethics by any member of staff or anyone who has contracts/employment relations with CELIM will result in the adoption of the disciplinary measures provided for by the applicable collective agreement or, in the case of external parties, any measures deemed necessary and/or appropriate to prevent any recurrence of the ascertained breach

11. Acceptance and visibility of the Code of Ethics

All subjects interacting with CELIM must be shown and must read, share and sign by way of acknowledgment and acceptance this Code of Ethics.