



AIDOS CODE OF ETHICS

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FOREWORD

Mission of AIDOS

The Italian Association for Women in Development (AIDOS) is a non-governmental organization that since its foundation (1981) is committed - internationally and in Italy - to build, promote and defend the rights, dignity and freedom of choice of women and girls.

AIDOS collaborates with partner organizations in different countries for the joint construction of projects aimed at the specific needs of women and girls and the development of shared strategies. It is also part of several networks of organizations, both at national and international level.

AIDOS activities on the ground aim at creating structural conditions for sustainable development. The same can be said of the campaigns that, by creating awareness of the issues addressed, promote the empowerment of women and of the entire communities to which they belong. Solving the specific problem of a particular community is not enough: it is necessary to positively influence government policies in order to contribute to improving the living conditions of all women and the population of the country concerned. For this reason, all AIDOS projects include important information and advocacy work.

AIDOS has special consultative status at ECOSOC (Economic and Social Council of the United Nations) and is implementing partner of UNFPA (United Nations Population Fund) and UNHCR (United Nations High Commissioner for Refugees) Italy.

1. Purpose and Scope of the Code of Ethics

This Code of Ethics collects and gathers principles and values that must guide and regulate the behaviour and conduct of all the people and organizations that collaborate with AIDOS or on behalf of AIDOS in Italy and/or abroad¹. All the addressees are bound to the strict observance of its contents.

As far as companies providing goods are concerned, AIDOS will only use those that respect the principles set out in its ethical policy for donations², while for companies providing services AIDOS will require that they recognize and apply the ethical values expressed in this document. The Code of Ethics establishes rules, responsibilities, duties and behavioural patterns - with respect to the value system it expresses - that everyone working on behalf of AIDOS is required to respect and pursue. The complete adherence to the Code presupposes the correct understanding, sharing and commitment to the achievement of the mission of AIDOS.

The Code of Ethics is an official document that defines with clarity and transparency the set of values that inspire the Association to achieve its objectives. It aims to make explicit, transparent and effective the model of organization, management and control of AIDOS in order to prevent prejudicial events and crimes to which the Association may be exposed in the performance of activities related to its mission.

The Code of Ethics is approved by the Board of Directors of AIDOS, which prescribes its observance and application by any person acting on behalf of AIDOS as well as the

¹ The term includes in a non-exhaustive way staff, external consultants, interns, members of the board of directors, the persons and/or organizations offering services to AIDOS etc.

² <https://aidos.it/wp-content/uploads/2017/07/policy-etica-aidos-def.pdf>

members of the organization.

Any revision or change in whole or in part must be submitted to AIDOS Board for approval.

1.1 Addressees of the Code of Ethics

This Code of Ethics applies to the following "addressees" wherever they operate, both in Italy and abroad:

- AIDOS members, directors, employees, collaborators, consultants, volunteers, interns;
- to all associations and organizations that bear the AIDOS name and to all persons who are part of them;
- all those who collaborate or work, even temporarily, with and on behalf of AIDOS.

1.2 Obligations of the addressees

The addressees undertake to:

- act and behave in accordance with the Code;
- report all violations of the Code as soon as they become aware of them;
- consult their supervisor, or the appropriate bodies, in relation to those parts of the Code that require interpretation or guidance.

The promotion or prohibition of certain behaviours goes beyond the normative level. The behaviour of the governing bodies (President, Board of Directors) and - in general - of all the employees and collaborators in the performance of their duties or tasks cannot be considered justified if it is contrary to the law in force, to this Code of Ethics or to the policies of the Association.

AIDOS does not establish or intend to continue business relations with those who clearly refuse to respect the principles of the Code.

The Code is an integral part of the working relationship and it expresses the essential content of the fiduciary bond between AIDOS and all its collaborators and all its other addressees.

Violations of the above-mentioned obligations implies the adoption of sanctions against those who have carried them out.

1.3 Confidentiality and privacy protection

The knowledge developed by AIDOS is a fundamental resource that every addressee of the Code must protect. AIDOS information shall be accessible only to authorized persons and shall be protected from undue disclosure. Only persons expressly authorized by AIDOS shall have access to internal information, whether it is in paper form or in magnetic, electronic or optical media. The information may only be used for the purposes and for the periods specified in the relevant authorizations. Passwords are equivalent to signatures and may only be known by their respective holders and may not be disclosed to third parties. Each person shall ensure that all necessary measures are taken to preserve AIDOS information.

AIDOS ensures that personal and sensitive data for the performance of its activities are processed, communicated and disseminated in compliance with national and European legislation on privacy protection. Failure to comply with the obligation of confidentiality will constitute a serious breach if it implies, by any means, the disclosure or if it offers the opportunity of disclosure of information concerning survivors of violence, abuse, trafficking and beneficiaries of AIDOS programs.

AIDOS takes all necessary measures to preserve personal and sensitive data, in

accordance with the requirements of Legislative Decree 196/03 and GDPR 679/16 "European Regulation on Personal Data Protection".

2. Ethical Values and Principles

AIDOS is committed to carrying out its activities in accordance with the principles of:

equal opportunities and non-discrimination: to guarantee equal treatment and opportunities regardless of differences of any kind such as age, sex, gender, origin, nationality, religion, sexual orientation, gender identity, disability;

interculturality and respect for cultures: to operate with respect for different cultures, favouring intercultural dialogue and promoting the rights and dignity of the person;

solidarity: spreading and affirming the culture of solidarity through information and awareness-raising for the defense of and respect for the fundamental rights of all people;

legality: to know and observe the codified disciplines (laws, equivalent acts, regulations) issued by international and national institutions and in particular the rules against corruption, those relating to the discipline of accounting records and the budget, the rules on the protection of personal data, health and safety, and the rules on labour;

fairness and loyalty: to behave in a fair and loyal manner in all activities, in particular in situations of potential competition with all other associations with particular reference to the use of human resources;

equity: to follow a conduct inspired by the common sense of substantial justice;

impartiality: to act and judge objectively and fairly, without favoritism due to feelings of friendship or enmity, kinship or affinity of any kind;

transparency: accountability to beneficiaries and all donors, both institutional and private;

neutrality and independence: operating without being conditioned by private interests and autonomously from government policies, maintaining equidistance from both political parties and religious denominations;

participation: involving local institutions, communities, associations and organizations in order to analyze the problems and identify the most appropriate solutions while respecting the cultures, customs and habits of the beneficiaries;

sustainability of the intervention: to carry out projects by making the most of local structures, economic resources and staff, with the aim of concrete and lasting development by spreading the skills for complete autonomy in the countries where the intervention takes place;

efficiency and effectiveness: to administer the funds used in such a way as to respond effectively to the needs and requirements of those who benefit from the organization's support and to be adequately accountable for its work;

innovation: pursuing the continuous improvement of its competencies, refining methods and operational strategies that are able to implement innovative and increasingly effective approaches;

respect for the environment and eco-sustainability: within the limits of budgetary resources, AIDOS ensures an environmentally friendly organization of work and services, promoting in particular energy saving, dematerialization of documents and recycling of renewable materials. AIDOS is committed at central and peripheral level to promoting higher environmental standards. In particular, AIDOS complies with the requirements of

environmental protection, waste production and disposal and pollution, respecting and implementing all relevant laws and regulations.

3. Transparency and Traceability of Accounting

AIDOS is aware of the importance of transparency, accuracy and completeness of accounting information and strives to have an administrative-accounting system that is reliable in correctly representing the management facts and in providing the tools to identify, prevent and manage, as far as possible, risks of financial and operational nature, and of frauds to the detriment of the Association.

All the actions and operations of the organization must be correctly recorded and it must be possible to verify ex post the process of decision, authorization and execution.

Each operation must have an adequate documentary support in order to be able to proceed at any time with controls certifying the characteristics and justifications of the operation and identifying the persons who authorized, carried out, recorded and verified it.

Accounting records must be kept accurately, completely and promptly in compliance with national and international accounting rules and good practices, in order to provide a faithful representation of the financial situation and of the management activity.

Whoever on behalf of AIDOS is involved in the accounting records must ensure the utmost cooperation, the completeness and clarity of the information provided, the accuracy of data and processing and must strictly adhere to the policies and procedures of AIDOS as well as to the rules and procedures of the financing bodies and the provisions of Italian law.

The financial statements and corporate communications of AIDOS must be drawn up clearly and give a true and fair view of the organization's assets and liabilities and financial position and must be published at least on AIDOS website.

It is expressly forbidden to prevent or hinder, through the concealment of documents or other suitable artifices, the performance of the control or audit activities legally attributed to the corporate bodies or the independent auditors.

It is in any case forbidden to hinder, in any form, the functions of the public supervisory authorities in the context of audits and/or inspections.

3.1 Prevention of corruption

The addressees of this Code of Ethics are obliged to conduct themselves in full compliance with the regulations on the prevention of corruption and to respect, in particular, the measures provided for in the AIDOS "Anti-Bribery & Anti-Corruption" Policy, to which reference should be made.

3.2 Conflict of interest

The addressees in the exercise of their functions shall not take decisions or carry out activities in conflict with the interests of the organization or incompatible with the mission and values of AIDOS. The situations in conflict with this rule must be immediately communicated to their Managers/Representatives.

In particular, conflicts of interest must be avoided between possible personal and family economic activities and the tasks that are carried out within the body of affiliation.

Finally, no one may obtain personal benefits in relation to the activity carried out on behalf of the organization.

3.3 Gifts, remuneration and other benefits

Gifts and gratuities are to be understood as those received occasionally as part of normal courtesy and international custom. Article 5.2 of the AIDOS Anti-Bribery & Anti-Corruption Policy defines the scope within which gifts may be given or received and states that the modest value of the gift shall not exceed **100 Euros**.

It is forbidden to directly or indirectly offer money, gifts, or benefits of any kind in a personal capacity to directors, officers or suppliers' employees, contractors, partners, government agencies, public institutions or other organizations and persons for the purpose of gaining undue advantage.

4. Rules of Conduct

4.1 Relations with donors/financing bodies

For the development of its activities in Italy and abroad, AIDOS avails itself of private and public financing. Relationships with donors/funders must be based on the utmost fairness, transparency and completeness of information as per *Anti-Bribery & Anti-Corruption Policy*. In particular:

- AIDOS provides donors with complete and transparent information about the Association, the initiatives and aims to be supported, the purpose of fundraising, the results obtained;
- it is forbidden to give, offer or promise money or other benefits or favours;
- it is forbidden to exert unlawful pressure to induce donors to donate;
- it is forbidden to make untrue statements in order to obtain public and/or private grants, contributions or funding;
- donations received must be disclosed;
- clear identification of the source of donations is required;
- the confidentiality of donors is respected;
- donations of materials, services and money from companies and organizations that operate in contrast with the values and mission of AIDOS are refused. Please refer to the Association's "Ethics Policy for Corporate Donations"³;
- it is forbidden to allocate sums received by way of disbursements, contributions or loans for purposes other than those for which they were assigned.

4.2 Relations with beneficiaries

The beneficiaries must be fully involved in the choices concerning the definition of the actions in which they are involved and must be informed in a transparent way about the activities and the results of the projects. In the relationship with the beneficiaries AIDOS must, in addition to what already stated in the general principles:

- inform about the ethical principles of its collaborators and partners;
- encourage the creation of groups of beneficiaries who can express their opinion and provide feedback on the development of activities and the quality of services provided to them.

4.3 Relations with partners

Within its activities, AIDOS:

³ <https://aidos.it/wp-content/uploads/2017/07/policy-etica-aidos-def.pdf>

- promotes and encourages the active involvement of local partners in the implementation of its activities and the pursuit of its aims and objectives;
- is committed to providing training, developing skills and creating professionalism in the organizations with which it works, with the aim of encouraging direct management of activities and resources by the partners themselves;
- works with the aim of building lasting relationships based on the actual needs of the target populations and the sustainability of the projects implemented;
- does not accept relationships of dependence with profit-making bodies, nor to be linked in any way to their interests, nor to have relationships that restrict the organization's freedom of movement and decision with respect to its stated aims and objectives.

The choice of partners (public and private) for the implementation of shared activities is based on the following criteria:

- sharing AIDOS ethical principles and mission and the objectives of the activities;
- absence of profit making with regards to joint activities;
- competence and reliability;
- willingness to co-design and co-manage.
-

4.4 Relations with employees, collaborators, consultants, volunteers and statutory bodies

Human resources are considered a fundamental element for the organization. The dedication and professionalism of the staff and of all those who collaborate with and work on behalf of AIDOS are values and conditions determining the achievement of the aims and objectives of the organization. All the people involved, in any capacity, in the activities of the organization are ethically responsible for their behaviour and aware that they represent the organization with their actions. The organization promotes the participation and involvement of its staff and of all those who collaborate with and work on behalf of AIDOS in the management of the organization and its activities. Every person of the organization is required to know and respect the principles of the Code of Ethics.

4.5 Relations with suppliers

In the relationship with suppliers, the organization must, in addition to all that is already set out in the general principles, make sure to be inspired primarily by objective parameters related to social responsibility, ethics, sustainability, quality, convenience, price, capacity and efficiency, such as to establish a relationship of trust.

4.6 Relations with press, media and public

AIDOS external communications must be truthful, complete and verifiable, not aggressive, respectful of the rights and the dignity of the person. AIDOS addresses the press and media through the designated people, who must operate with an attitude of maximum fairness, availability, prudence and transparency.

AIDOS operators called to illustrate or provide outside data or news about objectives, results and points of view of the organization are required, in addition to compliance with internal procedures, to obtain permission from their contact person, and to agree on the contents with AIDOS.

4.7 Relations with testimonials

Within its activities, AIDOS promotes and encourages the active involvement of public persons from the world of art, show business, sport and culture, as well as survivors of violence and/or beneficiaries of projects as testimonials, for the implementation of activities

and the pursuit of its aims and objectives. In building and managing the relationship with the testimonial(s), the organization commits itself to:

- provide the testimonial(s) with all information on the organization, its aims, the supported projects and all the principles set out in this Code of Ethics, with the aim of fostering a transparent, direct and lasting relationship;
- scrupulously respect both the privacy and the public image of the testimonial, never using it for activities that conflict with his/her dignity and public image as well as his/her work activity;
- make sure that each testimonial selected and chosen by the organization meets the following requirements: has a good reputation and a positive public image; carries out activities that are coherent or not in conflict with the guidelines of the Code of Ethics and with the mission of the organization; has a job that is functional to the strategy and the objectives of AIDOS; has a willing attitude to solidarity causes.

4.8 Relations with public administrations

AIDOS employees and external collaborators shall behave correctly in the management of the economic activities of the organization and in the relationships with the Public Administration, whether Italian or European or extra-European institutions.

All practices of corruption, fraud, swindling, illegitimate favours, collusive behaviour, solicitation (direct and/or through third parties) of personal and career advantages for oneself and others are explicitly prohibited.

The organization undertakes to identify and define specific transparent, documented and traceable management methods of incoming and outgoing financial resources suitable to prevent committing crimes.

4.9 Relations with the judicial authority

With regard to any request of any kind by the Judicial Authority and in general in any contact with it, AIDOS undertakes to provide the utmost cooperation and make truthful and representative statements of the facts, refraining from conduct that could hinder correctness and transparency, in full compliance with the law and in accordance with the principles of fairness. All AIDOS operators are obliged to cooperate as much as possible with the investigations carried out by the competent Authorities.

4.10 Exploitation and sexual abuse

AIDOS adheres to a policy of zero tolerance to sexual exploitation and abuse. The relevant rules of conduct for the prevention and response to such violence are defined in the document "AIDOS PSEA".

Every person who works for AIDOS and/or represents the organization in any capacity is required to be aware of this policy and sign the statement "*Protection from sexual exploitation and abuse*".

The following are the basic principles to prevent sexual exploitation and abuse:

- sexual exploitation and abuse by persons who in various capacities work for and/or represent AIDOS constitutes an act of major professional negligence and there is therefore a basis for termination of employment;
- sexual activity with minors (persons under the age of eighteen) is prohibited, regardless of the local age of majority. Incorrect consideration of the age of the child does not constitute a mitigating factor;

- the exchange of money, labour, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes the exchange of assistance that is owed to the beneficiary(ies);
- sexual relations between people working and/or representing AIDOS and the beneficiaries are strongly discouraged as they are based on unequal power dynamics. Such relationships undermine the credibility and integrity of AIDOS' work;
- when a person who in any capacity works for and/or represents AIDOS has concerns or suspicions about sexual abuse or exploitation by a colleague, whether or not employed by AIDOS, s/he shall report such concerns through the reporting mechanisms set out in AIDOS PSEA policy;
- individuals who in any capacity work and/or represent AIDOS are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of the policy.

5. Measures in the Event of Violation of the Code of Ethics

Every violation of the Code contents must be reported to the President of the Organization who will report it to the Board of Directors. AIDOS, in order to protect its image and its assets, reserves the right to adopt the necessary measures in legal terms (termination of the contract art. 1453 c.c.).

In case the President violates the Code, the report can be addressed to the Vice-President who will report to the Board of Directors.

5.1 Judicial authority

It is forbidden to exert any kind of conditioning on the person called to make statements before the Judicial Authority in order to induce him/her not to make statements or to make false statements.

It is forbidden to help those who have committed a criminally relevant fact in order to evade the investigations of the Authority or to escape its searches.

5.2 Control and supervisory body

Pursuant to art. 6, paragraph 4 of Legislative Decree 231/2001, concerning "Regulations on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to art. 11 of Law no. 300 of 29 September 2000", the functions of the Supervisory Body are carried out by the Board of Directors, which may, in compliance with the law, appoint an external body. The Supervisory Board, which has full and autonomous powers of initiative, acts as guardian of the Code of Ethics.

It also has the task of assessing the adequacy of the organization and management model (hereinafter the "organization model") adopted by the organization, as well as supervising its compliance and dissemination, in order to prevent the offences provided for in Legislative Decree no. 231/2001 and subsequent amendments and additions. In exercising its functions, the Body must be guided by principles of autonomy and independence.

The Supervisory Board is responsible for verifying and ascertaining any violations of the duties provided for in this Code.

The addressees of this Code are required to cooperate with the Supervisory Board in carrying out the activities assigned to them, ensuring free access to all documentation deemed useful.

The procedures for disputing infringements of this Code and imposing the consequent

sanctions shall be carried out in full compliance with the provisions of Article 7 of Law No. 300 of 20 May 1970 and with the provisions of agreements and labour contracts, where applicable, on the subject of counterclaims and the right of defense of the person charged with the offence.

5.3 Relations with control and supervisory bodies

Relations with control and auditing bodies must be based on principles of timeliness, correctness and transparency. The control bodies must be given the utmost cooperation, avoiding any obstructive behaviour. In the event of non-compliance with the principles and rules expressed in the Code of Ethics, the organization reserves the right to take the necessary measures both in terms of corrective actions and sanctions, in a gradual manner depending on the seriousness of the charges. In the particular case of a violation by the beneficiaries, the Board of Directors will consider the most appropriate measures to avoid this resulting in damage to the communities with which the organization works.

Donors or suppliers who carry out actions contrary to the principles of this Code of Ethics (such as promises of benefits, gifts, advantages or donations to co-operators or collaborators, false declarations) may be proscribed by the competent corporate functions, upon report by the Supervisory Body of the organization. The proscription requires the operators to stop any form of collaboration with such donors and suppliers. Any subsequent reintroduction must be assessed in advance by the organization's Board of Directors.

5.4 Methods of implementation and monitoring

The implementation of the indications provided by the Code of Ethics is carried out through the following operational rules:

- the Code of Ethics - which, together with the preventive procedures dedicated to more sensitive aspects⁴, gathers all the indications aimed at preventing prejudicial events with negative impact – has been developed; all the addressees are required to strictly observe the contents of the Code of Ethics and the procedures as far as they are concerned;
- compliance with the rules is part of the contractual obligations of the employees pursuant to Articles 2104 and 2106 of the Civil Code; therefore, the violation of these rules constitutes a breach of contractual obligations and may lead to the application of the sanctions provided for;
- the contents of the policies and rules, as set out in this Code of Ethics, are brought to the attention of staff by means of appropriate communication tools aimed at promoting awareness of the principles and ethical standards, in particular for new recruits.

⁴ *Anti-bribery & anti-corruption policy; Child safeguarding policy; PSEA policy, Ethics Policy for Corporate Donation; Procurement policy; Management and financial procedures policy.*