People for development

CODE OF ETHICS

FONDAZIONE AVSI-ETS

People for development

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INTRODUCTION

The Code of Ethics (from here on referred to as: "Code") is an official Fondazione AVSI-ETS document (from here on referred to "AVSI" or "Foundation"), approved by Meeting of Founding Members, which contains principles and rules of conduct to be followed by anyone who works or deals with the Foundation, such as partners, donors, beneficiaries.
The purpose of the present code is to declare and disseminate the values and rules of conduct that the Foundation intends to maintain as a reference during its activities.

The present code is binding and must be met by all staff members: this includes anyone who conducts activities on behalf of the Foundation, anywhere, both within Italy and abroad, anyone who fulfils roles of representation, administration or management of the Foundation, as well as collaborators and external consultants operating in the interest of AVSI. Adherence to this Code of Ethics also implies the formal adherence to AVSI policies and in particular of the NORMA DIGE 3 - 2020 Child Safeguarding Policy; GL-DPRW-05- AVSI Policy on Prevention from Sexual Exploitation and Abuse and Sexual Harassment (PSEAH); NORMA DIGE 8 - 2020 Fraud and Corruption policy.

Control over the compliance with the present Code is exercised by a Supervisory Authority as per the "Model of Organization, Management and Control" pursuant to Decree n. 231 of June 8, 2001 (from here on "Model"). The Supervisory Authority may propose changes to stay up- to-date with new laws and with potential new activities.

The present Code was adopted by AVSI Foundation Board of Directors on 2013, April 30 with immediate effect and subsequently updated and modified with resolution of the Meeting of Founding Members held on June 23, 2021. Lastly, during 2024, the Code of Ethics was integrated with references to the Whistleblowing System which the AVSI Foundation has equipped with pursuant to Legislative Decree 24/2023.

The present Code is available on the Foundation website and is displayed on the wall of the Foundation's Headquarters.
All AVSI network members are required to adopt the present code or equivalent document stating equivalent principles binding for all their staff members.

This Code of Ethics is not aimed at merely controlling the behavior required of each individual person but intends to provide the directives and reasons for the action of all staff and all stakeholders. These directives are rooted in the vision of the Foundation (AVSI works for a world where the person, aware of his/her value and dignity, is the protagonist of his/her own integral

development and that of his/her community) which gives form and substance to the work of AVSI in all its dimensions, including rules, regulations and policies.

MISSION AND VALUES OF THE FOUNDATION

AVSI Foundation was founded in 1972 as “Association of Volunteers for the International Service”.

It is a not-for-profit organization which works for a world where the person, aware of his/her value and dignity, is the protagonist of his/her own integral development and that of his/her community. Its statutory mission is the promotion of development cooperation activities – also abroad - volunteering and support to peoples in developing countries, transition economy countries and any country that experiences acute need or emergencies, providing also humanitarian assistance.

It was recognized in 1973 by the Italian Ministry of Foreign Affairs as a non-governmental organization for international cooperation (NGO); is registered as a PVO with the United States Agency for International Development (USAID) and holds General Consultative status with the UN Economic and Social Council (ECOSOC) in New York.

In 2004, the Council of Founders officially transformed AVSI from an association into a foundation, thus calling it “AVSI Foundation” and approving its statute.

Since October 17, 2024, the foundation has been officially registered in the RUNTS (National Single Register of the Third Sector) and has thus obtained the status of Third Sector Entity (ETS), acquiring — in legal terms — the name “Fondazione AVSI-ETS.”

The reference values are expressed in AVSI's Vision and Mission:

Vision

AVSI works for a world where the person, aware of his/her value and dignity, is the protagonist of his/her own integral development and that of his/her community, even in crisis and emergency contexts.

Mission

AVSI implements cooperation projects in various sectors with a preferential focus on education, meaning that the person is accompanied towards self-discovery and recognition that the other person is a resource. Each project is conceived as an instrument to promote this awareness in everyone involved, has in itself a need for communicating and sharing, and creates an impact capable of generating a positive change.

The AVSI method is summarized in five basic points, which represent the criteria according to which AVSI works in the realization of its projects:

- to start from the value of the person, who is never defined by the circumstances in which s/he lives

- to consider the person always in his/her family and community context
- to do with: accompany and let ourselves be accompanied, recognizing that we all share the same human experience
- to involve all stakeholders: encourage the participation of beneficiaries, providers, partners, donors, and the private sector
- to learn from experience and capitalize on the lessons learned.

Furthermore, as indicated in the Statute, AVSI operates through the promotion, support and strengthening of associations and organizations of civil society, according to the principles of subsidiarity and solidarity

ETHICAL PRINCIPLES OF CONDUCT

The Code of Ethics, an essential foundation and integral part of the Model, contains the ethical principles and rules of conduct to be followed in the workplace. These principles are:

Legality

AVSI's inescapable principle is respect of law and regulations in force in all countries where it operates. Employees, collaborators, providers, partners, donors and anyone who deals with AVSI must commit themselves to this principle. AVSI will not establish or maintain any relation with anyone who does not abide by this principle.

AVSI clearly states that no-one can violate the law by arguing that he does so in the interest of AVSI, as what is against the law is against AVSI.

Equity, Equality and Non-Discrimination

Fondazione AVSI is committed to promoting, through its conduct, a working environment based on respect for equal treatment and equal dignity regardless of age, ethnicity, nationality, citizenship, personal and political opinions, religion, marital status, gender, sexual orientation, disability, and membership in any other category protected by law. Fondazione AVSI is committed to ensuring respect for equal opportunities for all male and female workers.

Safeguard and protection of the person

The value of the person as such is a fundamental principle that guides AVSI's conduct. The Foundation's approach is based on listening and dialogue with the goal of improving solutions and services offered to users and stakeholders, as well as professionalism and skills of its own staff.

With the protagonists of its activities, AVSI promotes as much as possible a participatory approach at all levels (elaboration of the proposal, selection of beneficiaries, implementation of activities; monitoring of activities; evaluation of results; feedback and complaints) in the belief that each one,

even if in difficult conditions, can and must contribute to its own development. The active and proactive involvement of the participants is an important factor for a long-term sustainability of the actions implemented, as well as the processes of change launched through the project.

Throughout its work and projects, AVSI safeguards and promotes human rights within the range of its activities, by cooperating with and supporting other national and international organizations pursuing this goal. AVSI will not favor, either directly or indirectly, any abuse. On the contrary, it will report any abuse it comes to know of.

Sexual harassment is also considered as such, meaning any unwelcome conduct of a sexual nature—whether physical, verbal, or non-verbal—aimed at or resulting in violating the dignity of a female or male worker and creating an intimidating, hostile, degrading, humiliating, or offensive environment. The reporting and response procedures for any such discrimination are specified in the policy for the prevention of sexual exploitation, abuse, and sexual harassment (GL-DPRW-05), which every employee is required to sign and comply with.

Dutifulness

AVSI Foundation will respect its employees and require them to always act with attention and accuracy in their work, through the best use of available resources and by avoiding undue burdens and waste of resources with full respect to AVSI rules, regulations and policies.

The Foundation will constantly provide training and development programs in order to increase the professionalism of staff at different levels and improve their professional and management skills.

Transparency

The Foundation ensures and maintains as much transparency as possible in its activities: every operation and transaction is accurately recorded, authorized, verifiable, lawful, consistent and reasonable, according to the law in force and internal regulations. Bribery, corruption, and complicity in such wrongdoing are prohibited. Anyone who has any relation with the Foundation must be provided with complete and accurate information on the activities they have to do with.

In particular, all accounting must be adequately reported so that it is possible to assess the actual financial performance of the Foundation and monitor a not-for-profit conduct, in compliance with the Foundation's Statute.

The subjects who have relationships with the Foundation must be placed in the condition of having complete and precise information on the activities that concern them.

Regarding in particular the beneficiaries of its activities, whether they are local people or local organizations, AVSI will put in place all possible initiative thus to give them the opportunity to

fully understand the reasons and the criteria applied in the actions, the effects of such actions on their life so that they may contribute to it as protagonists.

Protection of privacy and confidentiality

The Foundation ensures compliance with laws on privacy and confidentiality. Data protection and data security are also guaranteed at all times according to EU Regulation 2016/679 of the European Parliament (General Data Protection Regulation - GDPR).

AVSI processes all personal and sensitive data in its possession lawfully and fairly, safeguarding the rights of the data subjects and preventing unauthorized access by third parties. The full privacy notice is available on AVSI's website.

Absence of conflict of interest

Fondazione AVSI requires its employees, partners, and collaborators not to pursue personal gain, or gain for the Foundation itself, in violation of applicable laws and the rules set out in the Code of Ethics. In carrying out their activities, employees and collaborators must avoid situations in which the individuals involved are, or may even appear to be, in a conflict of interest, as detailed in Standard DIGE 8 – 2020 Anti-Fraud and Anti-Corruption Policy.

In the event of a conflict of interest, the individuals to whom this Code of Ethics applies shall promptly inform their hierarchical supervisor, in accordance with the provisions of GP-DHRG-30 – Whistleblowing Policy for the Management of Reports.

RULES OF CONDUCT FOR INTERNAL AND EXTERNAL RELATIONS

The rules of conduct, deriving from the general ethical principles and the ethical principles of conduct regulate the relations within and between:

- Donors
- Partners
- Suppliers
- Employees/collaborators/volunteers/internal bodies
- Beneficiaries
- Press and media
- Auditors
- Public Administration

Relations with Donors

Transparency and fairness are ensured through relations with donors, to this end:

- it is prohibited to give, offer or promise any money or other non-cash benefit;
- it is prohibited to exercise undue pressure;
- it is prohibited to submit untruthful statements with the purpose of receiving public funds or benefits;
- accounting procedures must clearly identify donations as well as their sources;
- it is prohibited to use money received as donation for any purpose other than the ones for which it was originally given;
- the funds must be used in such a way that operational costs are kept to a minimum and as many resources as possible are allocated to the beneficiaries;
- activities must ensure productive employment of facilities, economic resources and local staff with the purpose of reaching a concrete and lasting development in the country.

AVSI Foundation will reject any donation in materials, money, services from companies that

manifestly violate human rights, the rights of workers or the environment, that produce or trade weapons, pornographic material or any other material that would degrade the human person and the environment.

Relations with Partners

The choice of Partners (bodies or associations) for the implementation of common projects and activities is based on and inspired by the sharing of the same ethical principles contained in the Foundation's Code of Ethics;

Relations with Suppliers

When choosing its suppliers, AVSI Foundation:

- favors technical and economic subjects in the local or neighboring countries where a decent quality of goods, labor and services is maintained;
- appoints a subject in accordance with tender procedures for goods, works and services, on the basis of objective evaluations and in full compliance with the standards of free competition, quality and low price.
- Demands respect for laws, ethical clauses and rules dictated by the Foundation.

Relations with Employees, Collaborators, Volunteers, Members of Internal Bodies

AVSI's main asset is its human resources; the Foundation promotes their skills, aspirations and professionalism.

Relations with employees, collaborators, volunteers and members of internal bodies must be conducted with maximum respect and must be based on a codified set of rights and duties.

In particular:

Duties of AVSI Foundation

- offering everyone equal opportunities of professional development, with no discrimination based on gender, age, disability, religion, sexual orientation, nationality, ethnicity or political and union affiliation;
- observing the principles contained in the Universal Declaration of Human Rights and in the European Convention on Human Rights, in the Declaration of Rights of the Child and in the Convention to Eliminate All Forms of Discrimination Against Women;
- complying with the international standards on working conditions and workers' rights, of

which we can mention: freedom of expression, of association, the right to collective bargaining, abolition of forced labor, equality of opportunity and treatment and other standards set by the International Labor Organization (ILO).

- ensuring adequate and functional work environment;
- avoiding any form of discrimination and abuse: all decisions related to human resources must be made according to merit and ability, without favoring any individual.
- rejecting any form of irregular work, forced labor or exploitation;
- pursuing constant improvement of everyone's skills, by favoring training and development opportunities and perfecting operational methods and strategies;
- acknowledging everyone's skills and contributions to the common goal;
- ensuring circulation and adherence to the Code of Ethics and procedures;
- ensuring privacy;
- ensuring compliance with laws and regulations concerning health protection and work safety;
- providing adequate information on life and safety conditions in the country where personnel are employed, as well as on sanitary prevention practices to be followed.
- act in accordance with the principle of inclusiveness in the broadest sense and counter all forms of discrimination, prejudice, and stereotyping.

Duties of Employees

- observing the fundamental rights of the person, especially the rights of the child and avoiding any form of discrimination;
- behaving and dressing with decency, showing respect for local colleagues, partners, habits, cultures and religions within the dignity of one's role and in accordance with the principles of the Foundation;
- adopt inclusive language that places the person at the center and pays attention to and values every form of diversity;
- employing the Foundation's goods in a fair way;

- showing respect for work environment and premises;
- reporting any conflict of interest that may arise in the course of one's work.

Staff are prohibited to:

- participate in military operations and the like;
- own and carry weapons on AVSI vehicles and premises;
- participate in political activities without explicit consent from the Foundation;
- act in a way that damages the Foundation or its image;
- employ underage workers;
- use psychotropic substances;
- act in a violent/abusive manner through threat, oppression, psychological harassment which offend dignity and psychophysical integrity of lower-level colleagues or which degrade the work environment;
- exercise any form of harassment;
- have sexual relations with underage people;
- effect payments and transactions in an unfair way and against the anti-money-laundering laws;
- make and circulate false money, even if it was received in good faith;

Relations with Beneficiaries

Beneficiaries must be fully informed on the ethical principles that inspire the collaborators and partners, as well as on the activities, donors and resources used in the activities that affect them as indicated in the GL-DPRH-04 - Accountability towards affected populations and stakeholders and GP-DPRH-29 - Accountability towards affected populations and stakeholders.

Relations with Press and Media

Outbound communications must be truthful, verifiable, not aggressive and respectful of rights and dignity of the person.

Relations with Auditors

Relations with auditors must be conducted rapidly, fairly and with transparency. Auditors must be provided full cooperation and obstructionism must be avoided. It is prohibited to conceal information, provide untruthful documents and obstructing the auditors in the performance of their duties.

Relations with the Public Administration and Judicial Officers

Relations with the Public Administration, including Supervisory Agencies, must be managed by those in charge of such relations and with transparency, fairness, completeness and traceability.

AVSI commits itself to:

- not receiving any funds or contributions from the Public Administration by means of false and untruthful declarations or by omitting due information;
- not using funds or contributions for any purpose other than the ones for which they were originally given;
- not pursuing any other benefit by defrauding the Public Administration.

As far as relations with judicial officers are concerned, it is prohibited to exercises any form of pressure on the person called to testify with the purpose of preventing such testimony or making it untruthful.

It is prohibited to help a person who has carried out an act of legal significance to avoid the investigation of the authorities, or to escape their investigations.

RULES ON THE APPLICATION AND VIOLATION OF THE CODE OF ETHICS

Adoption and circulation

The board of directors is the sole internal body that can adopt and modify the Code of Ethics.

The Code is made available to all the employees and circulated to all key stakeholders; it is also available on the Foundation's website www.avsi.org.

Field of application

The principles of this Code apply to everyone who works with AVSI Foundation: administrators, auditors, managers, employees, collaborators, partners, suppliers, donors and beneficiaries.

Supervision

The Supervisory Authority, established under Decree 231/01, is in charge of promoting and monitoring the compliance with the Code of Ethics. In particular, the Supervisory Authority:

- promotes the implementation of the Code through ad hoc procedures;
- proposes changes to the Code;
- examines reported violations and submits the outcomes of such inquiries to the body in charge.

Violations

Compliance with the Code of Ethics is part of the contractual obligations of anyone who works with AVSI Foundation.

In case a violation of the Code of Ethics is confirmed, and in case they are employees, AVSI must prosecute those responsible for the violations, according to the contract in force; in case they are external subjects, it must resort to all necessary/appropriate measures in order to prevent such violation from ever happening again. Measures can include dismissal (resolution of contract according to Law 1453c.c.) or interruption of commercial/professional activities with a supplier/collaborator, with consequent mandatory compensation.

The identification and application of sanctions will always take into account the general principles of proportionality and adequacy with respect to the contested violation.

In all the aforementioned cases, the Foundation also reserves the right to exercise all actions it deems appropriate to compensate for the damage suffered as a result of behavior in violation of the Code of Ethics.

In compliance with the provisions of Italian Legislative Decree 24/2023, AVSI Foundation has defined a process for receiving and managing reports concerning acts and/or facts, that are even potentially contrary to this Code of Ethics. Anyone, in the scope of the work activities carried out within the organization, that is aware of them, should report.

AVSI Foundation has planned to establish the following internal reporting channels which can be alternatively used:

• a written channel: online platform accessible from any browser (including accessing from mobile devices) with the following address: https://whistleblowing.avsi.org/#/ which allows you to send reports.

• an oral channel: voice messaging box, reachable on the telephone number +3902674988408 and active every day, 24 hours a day.

The Foundation has issued the General Procedure called GP-DHRG-30_Whistleblowing Policy which aims to regulate the process of managing reports that are brought to the attention of AVSI according to the methods described, in relation to facts or circumstances in fact useful for ascertaining the possible commission of violations.

The AVSI Foundation has chosen a committee, called the Whistleblowing Committee, as recipient and manager of the Report, composed of members of the Supervisory Body appointed pursuant to Legislative Decree 8 June 2001. n. 231, by the HQ Human Resources Director and by the Safeguarding Policy Focal Point.

The Foundation undertakes to guarantee protection from any act of retaliation, discrimination or penalisation, direct or indirect, against the whistleblower and other subjects provided for by Legislative Decree 24/2023 for reasons connected, directly or indirectly, to the report.

Violation of the GP-DHRG-30_Whistleblowing Policy and the legislation on whistleblowing reports is punished pursuant to the disciplinary system referred to in the Organisation, Management and Control Model.

In any case, the communication channel with the Supervisory Body remains active, reachable at the email address organismodivigilanza@avsi.org

AVSI Foundation monitors compliance with the Code of Ethics, with adequate information, prevention and control tools and ensuring the transparency of the operations and behaviors implemented, intervening, if necessary, with corrective actions.

The Code of Ethics is integral part of the **Model of Organization, Management and Control**

adopted by the Foundation as per Italian Decree N.231/2001.