

The Ethical Code

ActionAid International Italia E.T.S.

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Note - ActionAid has always placed gender equality at the top of its list of priorities. For the sake of simplicity, readability and conciseness, throughout this document we used the masculine form as a false neutral for all nouns, articles, pronouns and adjectives that should be declined in masculine or feminine forms.

INTRODUCTION

ActionAid is an international and independent organisation which works on a daily basis with people, communities, groups and movements which wish to defeat the causes and consequences of marginalisation and inequality.

ActionAid International Italia E.T.S. is a non-profit non-governmental organisation and has had a presence in Italy since 1989. The Association is part of the ActionAid International network, active in 71 countries worldwide. ActionAid pursues a world that is fair and just for everyone. It is an organisation that works to promote and encourage democratic participation everywhere, in Italy and worldwide; to involve people and communities in the protection of their rights; to collaborate at local, national and international level to bring about change; to promote social equity by improving the quality of democracy and supporting those living in conditions of poverty and marginalisation.

The Association works with the Fondazione Realizza il Cambiamento, founded by ActionAid in March 2016 to expand national planning work, has a presence throughout Italy with its own professional staff and works together with the ActionAid Bases, activists and volunteers for the achievement and implementation of its strategic objectives. ActionAid has one office in Milan, one in Rome and one in Naples.

The Ethical Code is in line with the International Code of Conduct, of which ActionAid Italia is also a signatory, which requires the highest level of personal and professional conduct from those who work under the association's name.

By means of this Ethical Code (hereinafter to be called the “Code”), ActionAid International Italia E.T.S. (hereinafter to be called “ActionAid” or “the Association”) wishes to define, clarify and share, on a formal basis, the totality of its recognised, accepted and shared values together with the rights, duties and responsibilities in dealings with parties with which the Association establishes relations for the fulfilment of its mission.

The Association’s Code has been drawn up to indicate the founding principles behind the conduct of all to whom it is addressed in order to define transparently and clearly the values inspiring ActionAid in the performance of its activities.

This Code forms an integral part of the Organisational, Managerial and Control Model pursuant to Legislative Decree 231/2001 (hereinafter to be called “the Model”). In the defence of its image and the safeguarding of its resources, the Association will not entertain relations of any kind with parties which do not intend to operate in strict compliance with the current law and/or which refuse to observe the ethical principles and rules of conduct set out in this Code. All people working or collaborating with ActionAid, without distinction or exception, must undertake to observe, promote and/or ensure the observance of, the principles of this Ethical Code.

Furthermore, the Code will constitute one of the Association’s official documents, approved by its Board of Directors and setting out the totality of ActionAid’s rights, duties and responsibilities.

The values inspiring the Association’s strategic deliberations form the foundations of this Ethical Code.

2. FUNDAMENTAL PRINCIPLES

2.1. ADDRESSEES

The Code contains the ethical principles which its members, its Directors, the Chairman, the Controlling Body, the Treasury, the Joint General Secretaries, those subject to the direction and supervision of the above, staff, consultants, collaborators, suppliers, volunteers, activists, partners using the ActionAid brand, ActionAid Bases, project partners, testimonials and all those operating in the name and/or the behalf of the Association without exception (hereinafter to be called “the Addressees”) will be required to observe.

As a result, the Code’s principles and provisions will be binding on all Addressees and will constitute the specification and examples of the general obligations of diligence, propriety and fairness which must inspire them in the performance of their activities.

The Addressees listed above are also required, within the limits of their respective duties and responsibilities, to ensure that third parties comply with the principles of this Code of Ethics and the related rules of conduct.

The value and importance of the Ethical Code are reinforced by the provision imposing specific liability on the part of Bodies as a consequence of the commission of the criminal offences and unlawful administrative acts referred to in Legislative Decree no. 231 of 8 June 2001.

2.2. MORAL VALUES

Observance of Laws and Regulations

All activities carried out in the name and on behalf of ActionAid must be effected in absolute observance of national and international laws and regulations in force. ActionAid will also ensure that its decisions and conduct are inspired by the responsibility for the public interest entrusted to it.

All Addressees undertake to acquire with diligence, the necessary knowledge of the laws and regulations from time to time in force applicable to the conduct of their functions. Relations with the Public Administration, public supervisory bodies, political and trade union organisations, national, community and international public institutions as also with public officers and persons charged with the performance of public services, must be conducted in compliance with the principles of transparency, integrity, professionalism and full collaboration.

Honesty and Integrity

Moral honesty and integrity together with the values of propriety and good faith, represent the fundamental principles for all the Association’s activities and initiatives, constituting essential values of its organisational management. The relations maintained by ActionAid on all levels must be characterised by criteria and conduct inspired by propriety, collaboration, fairness and mutual respect.

Transparency and completeness of information

The information disseminated by the Association must be complete, transparent, comprehensible and accurate so as to permit third parties to make well-informed decisions when conducting relations with

the same.

Responsibility to Society at large

ActionAid, being aware of its social role within its reference area, with regard to economic and social development and the general well-being of society at large, will operate with respect for local, national and international communities, directly supporting and promoting initiatives of social and cultural value including for the purpose of promoting public participation in public life and the accountability of institutions.

Ethics

The Association will pursue its activities following the rationale of efficiency and ethical behaviour, rejecting any collusive or unlawful conduct damaging to third parties.

The Association will actively support political measures undertaken against corruption and aimed at increasing public awareness regarding the same.

ActionAid will also support the enhancement and recognition of the skills and abilities of individuals and will seek to discourage all forms of favouritism.

Furthermore, the Association undertakes, to the best of its ability, not to encourage illegal immigration in its activities, particularly in the management of human resources, procurement and assistance activities related to the fight against poverty, the protection of women's rights and the integration and reception of migrants.

Promotion of respect for the dignity of the person and gender equality

ActionAid will promote and observe people's fundamental rights, protecting their moral integrity and guaranteeing equal opportunities.

ActionAid opposes all forms of abuse, mistreatment and violence against children, teenagers, women and vulnerable people, and promotes all actions to address and prevent high-risk social and environmental conditions.

Conduct which includes discrimination undermining personal dignity, in the private sphere and in terms of individual rights based on political and trade union rights, religion, gender, ethnicity, nationality and sexual orientation, involving a person's state of health and generally, any intimate characteristic of the human individual in either internal or external relations will not be permitted.

The Association will be actively involved in working to overcome all kinds of discrimination. All Addressees will thus work with men and women of different nationalities, cultures, religions, sexual orientation and ethnicities. ActionAid will promote the dignity, equality and well-being of each individual, refusing any form of child or forced labour.

ActionAid will reject and pursue any form of physical, verbal or psychological molestation or violence including the organisation of awareness campaigns for staff and volunteers. It will work actively and continuously with a view to intervening in international, national and local policies, fighting for women's rights and against gender stereotypes and economic injustice.

In the management of its hierarchical relations, the Association will require that authority is exercised with equity, avoiding all conduct that might in some way damage the personal dignity and professionalism of staff.

ActionAid undertakes to guarantee respect of privacy, particularly with regard to information concerning the private sphere and opinions both of its own staff and more generally, of those interacting with the same

Diligence and the Spirit of Collaboration

All Addressees will carry out their activities with the diligence required of the nature of their duties and the functions exercised, using the maximum commitment in achieving the objectives given them and taking on the responsibilities appropriate to their duties. All Addressees will carry out with diligence the investigatory and updating activities necessary within their own sphere of competence.

Reciprocal collaboration between those involved on any basis in the same project represents an essential principle for ActionAid. All Addressees will thus be required to contribute to the safeguarding of such values both in the work place and outside the same.

Traceability of Activities Carried Out

All Addressees are required to maintain adequate documentation for each operation carried out in order to permit and effect the checking of the motivation and characteristics of all operations at the stages of the authorisation, performance, recording and verification of the operation concerned at any time.

Staff well-being

ActionAid undertakes to pursue policies and good practice which protect the well-being of its staff, a factor underpinning the Association. Reconciliation between working and private life will be at the centre of its staff management policies.

Work-place Safety and Worker Health

The Association considers the safeguarding of the health and safety of its workers to be of prime importance, seeking to achieve as its objective not only compliance with the specific law in the field, but also unremitting efforts to achieve a continuous improvement in working conditions to prevent any risk to the safety and health of workers and society at large.

ActionAid will thus conform to current provisions governing safety and hygiene of the work environment and international provisions governing safety through the creation of an efficient system for risk prevention and taking technological progress in the field into consideration.

All Addressees must give the greatest possible attention to the conduct of their activities, closely observing all safety and accident prevention measures laid down and provided by the Association for the work place, work outside the office and trips away, in order to avoid any possible risk for themselves, their collaborators and colleagues and for society at large. In particular, they will be required to comply with all provisions laid down by reference to the Consolidated Safety Law (Legislative Decree no. 81 of 9 April 2008 as subsequently amended and supplemented) and any other legal provisions applicable to the Association; all Addressees will be required to comply with the Policies, instructions and directives provided by parties to which ActionAid has delegated the performance of obligations in the safety field.

The Association will be responsible for worker training and awareness of safety issues.

Protection of the Environment

ActionAid is sensitive, and committed, to the safeguarding of the environment. To such end it will

orientate its decisions in such a way as to guarantee compatibility between economic initiatives and environmental requirements, this entailing not only compliance with current law, but also taking account of the development of scientific research and best practices in the field.

3. RULES OF CONDUCT

3.1. GENERAL RULES OF CONDUCT

3.1.1. Conflicts of Interest

ActionAid will avoid involving itself in situations of conflict of interest, whether real or only potential, in the conduct of all its activities.

Addressees will be required to carry out their activities for ActionAid in observance of the objectives and the general interests of the Association.

Any situation potentially capable of generating a conflict of interest or otherwise compromising the Addressee's ability to make decisions in the best interests of the Association must be immediately reported to the Addressee's internal contact person or manager, the Head of Assurance, Compliance & Governance Office, the People Development & Safeguarding Unit or to the Co-Secretaries General. This will result in the Addressee in question being required to comply with the decisions taken and communicated by ActionAid, with a view to ruling on the management of the specific case of potential conflict of interest.

3.1.2. Relations with social media

ActionAid will support research into information innovation. Its organisational mission is based on an open, permanent, transparent and constructive dialogue with people and communities and it will also use social media to this end.

In the light of the resonance and impact that information may have, ActionAid will assess and recommend the greatest care in evaluating the contents and materials to be disseminated.

The use of organisational systems in breach of the law, to offend the liberty, integrity and dignity of the person or in a way capable of creating undue intrusion or damage to IT systems will be prohibited.

3.2. RULES OF CONDUCT IN THE CONTEXT OF RELATIONS WITH COLLABORATORS

3.2.1. Relations with Collaborators (professionals, consultants and partners)

ActionAid will identify and choose its collaborators (professionals, consultants, project partners and partners in the use of the ActionAid brand) with complete impartiality, autonomy and independent judgement.

In the context of relations with collaborators, the Association will be required:

- To assess with care the extent to which seeking services of external professionals and partners is appropriate and to choose counterparties of adequate professional qualifications and reputation;
- To give reasons for the choice of contractual counterparties;
- To establish efficient, transparent and collaborative relations, maintaining an open and frank dialogue and to obtain the co-operation of professionals, consultants and partners in ensuring the best relationship between service quality and the related economic investment;
- To enforce the application of provisions provided for under the contract;
- To operate in the context of current law and to require precise observance of the same.

The Association will, in the choice of its collaborators, be guided exclusively by objective parameters of quality, capacity and efficiency so as to permit the establishment of a fiduciary relationship.

The Association will, in the selection of partners, ensure to be guided by principles of transparency, effectiveness, capacity and the sharing of the values which inspire the Association's activities.

3.2.2. Relations with staff and local communities

The Association will actively promote, and offer equal opportunities for, professional development, excluding arbitrary discrimination, ensuring all relations are imbued with principles of equity, correctness and fairness, based on meritocratic criteria.

Relations between staff, irrespective of the related levels of responsibility, will be conducted with fairness, correctness and respect, without prejudice to the roles and responsibilities of the same. Managers will exercise powers connected with their positions with objectivity and balance, maintaining responsibility for the professional development of their collaborators. The conduct of all staff must be collaborative, carrying out their duties with responsibility, efficiency and diligence and in observance of the Association's values.

Staff recruitment and appointment must be effected in strict observance of the control protocols and be inspired by criteria of transparency in the assessment of requirements of skill and professionalism, ability and individual potential. Furthermore, the use of appointments and the remuneration system to give direct or indirect advantages to public employees and/or public officials will be prohibited.

The employment of staff will be effected on the basis of proper employment contracts, no employment relationship being permitted which does not conform with, or evades, current legislative provisions. In addition, the Association will not employ workers without a valid residence permit.

Being aware of the value of trade unions and their representatives, the Association will promote dialogue between its own employees and union representatives, providing all necessary information and collaborating with trade union bodies to contribute to the well-being of its staff, also offering its services as a forum for discussion between the social parties.

The continuing relationship with the community represents the foundation of ActionAid's activities.

As a consequence, the Association will respect, and contribute to the development of, the economic and social fabric of the local communities in which it operates and acts.

ActionAid will not contribute in any way to the financing of political groups whose representatives and candidates run for political office.

3.2.3. Relations with the Controlling Body and the Auditing Company

In relations with the Controlling Body and the Auditing company, all the Association's units and departments and all Addressees involved in the process, will maintain adherence to the provisions of this Code in observance of the different institutional roles.

Requests for the performance of duties and documentation must be acceded to without delay with clear acceptance of responsibility regarding the truth, completeness and accuracy of the information provided.

Any prevention or hindering of the control activities legally exercised by the auditing company or other company bodies will be expressly prohibited as will attempts to influence the independence of the judgement of such bodies in order to alter the representation of the Association's asset, economic or financial situation.

3.3. RULES OF CONDUCT IN THE CONTEXT OF RELATIONS WITH THIRD PARTIES

3.3.1. Relations with Supporters

ActionAid recognises the importance of the social commitment of its supporters as a fundamental basis of its work and as a consequence, guarantees congruity, quality and reliability in its actions taken in their regard. The Association will provide its supporters with adequate information in relation to the use of the resources donated to it.

ActionAid will also stigmatise any practice which is deceptive, misleading, fraudulent or unfair carried out by Addressees.

3.3.2. Relations with target communities

All Addressees who come into contact with the communities with which ActionAid works are required to behave in an irreproachable manner, with particular regard to the most vulnerable people, such as persons underage, women, marginalised people, etc.

3.3.3. Relations with Suppliers

ActionAid will ensure its relations with suppliers are inspired by principles of transparency, equality and fairness.

In particular, with regard to the choice of suppliers for the purchase of goods or services, the Association undertakes to be guided for the most part by objective parameters of social responsibility, ethics, quality, economy, price, ability and efficiency to such an extent as to permit the establishment

of relations of trust and confidence.

In the management of relations with suppliers, the Association will be required as follows:

- To establish efficient, transparent and collaborative relations, maintaining a frank and open dialogue in line with best commercial practices;
- To check the identity of the third parties with which the Association interfaces;
- To establish all necessary formalities in relation to all supplies and to document the reasons for the choices made;
- To obtain the collaboration of suppliers to ensure the best relationship on a continuing basis between quality, cost and delivery times;
- Not to abuse any position of advantage as customer to create intentional disadvantages for suppliers;
- Not to seek personal advantage by accepting advantages or particular economies in procurement activities;
- To enforce the application of conditions provided for under the contract;
- To operate within the current law in force and require the precise observance of the same.

ActionAid will require its suppliers to ensure that the materials or the products provided are not the product of previous unlawful activities and are in line with observance of the rights of people and of the environment.

The Association will only establish relations with parties with a respectable reputation, which are only involved in lawful activities and whose ethical culture is comparable with that of ActionAid.

3.4. RULES OF CONDUCT IN THE CONTEXT OF RELATIONS WITH THE PUBLIC ADMINISTRATION

3.4.1. Relations with Institutions, Public Officials and private persons

Relations with the following:

- the Public Administration,
- local, national and community public institutions,
- public officials and parties charged with the provision of public services,
- bodies, representatives, mandated bodies, managers, members, employees, consultants, parties charged with the performance of public functions or services, of public institutions, of the public administration, of public or private (including economic) bodies, of public or company bodies, of a local or national character ("Public Officials"), as also with associations and political and trade union organisations,

must always be maintained with the greatest possible transparency, propriety and integrity, avoiding conduct capable of creating the impression of wishing to improperly influence the decisions of the other party or requesting unduly favourable treatment. Relations with the parties listed above must be limited to the functions for which they have competence and due authorisation in the strictest observance of laws and regulations and must not in any way compromise the Association's integrity and reputation.

To such end the Association undertakes to act as follows:

- To operate, without any kind of discrimination, by means of the official communication channels with interlocutors of the Public Administration at the territorial, national and community level;
- To represent the interests and positions of ActionAid in a way that is transparent, rigorous and consistent, avoiding approaches which are collusive in nature.

In addition, the following conduct will be prohibited:

- To offer or promise, as also to accept or receive, directly or indirectly, amounts of money or other means of payment (save where it is a gift or use utility of small value and in any case in compliance with normal commercial practice) to public employees, public officials, parties charged with public service provision or private interlocutors, in order to influence their activities in the performance of their duties and to obtain advantages of any kind for the Association.

The above prescriptions may not be avoided by the use of different forms of assistance such as appointments, consultancy, advertising, sponsoring, employment opportunities, commercial opportunities or opportunities of any other kind;

- To agree to provide other advantages of any kind to public employees, public officials or parties charged with public service provision;
- To falsify, alter or omit information or data in order to obtain an undue advantage or any other benefit for ActionAid;
- To use monies received from the Public Administration in the form of payments, contributions or loans, for purposes other than those for which they have been granted;
- To offer, make payment of, promise or grant public employees, public officials or parties charged with public service provision, or to accept or receive from the same, whether directly or indirectly, gifts, benefits or other utility (including in the form of money, goods or services) which are unauthorised.

To such end it should be noted that only gifts of low value directly attributable to actions of normal courtesy and, in any case, of such a nature as to be incapable of creating the impression in the other party or an impartial stranger that it is intended to purchase or grant undue advantages or to create the impression of illegality or immorality will be allowed. Any party (e.g. staff of the Association's departments and/or units) receiving gifts which do not comply with the above, must immediately inform his or her contact, manager, the Compliance Manager or the Joint General Secretaries for the adoption of the appropriate measures.

3.4.2. Relations with Judicial Authorities

With regard to any requests of any nature from the Judicial Authorities and in general, in any contact with the same, the Association undertakes to provide the greatest possible collaboration and provide truthful declarations, representing a true account of the facts, avoiding conduct which might hinder proceedings, in full compliance with laws and conforming with the principles of fairness, propriety and transparency.

Furthermore, all Addressees involved in court proceedings will be required to provide constructive

collaboration and make declarations which are truthful, transparent and representing the facts.

The following will be expressly prohibited:

- To carry out any activity which might favour or damage one of the parties to the proceedings while the same are ongoing;
- To pressurise in any form and in any manner, parties called on to respond to the judicial authorities not to make declarations or to make declarations of facts which are untrue;
- To promise or offer money, gifts or other utility to parties involved in judicial proceedings or persons close to the same.

4. ACCOUNTING AND INTERNAL CONTROLS

4.1. ACCOUNTING AND TAX RECORDS

ActionAid considers that accounting transparency together with the maintenance of accounting records in accordance with the principles of truthfulness, completeness, clarity, precision, accuracy and compliance with current legislation, represent the fundamental pre-requisites for effective control and the establishment of correct communications within the Association.

Supporting documentation must be maintained for all operations facilitating their recording in the accounts, their reconstruction and the identification of any responsibility in relation to the same.

The accounting system will be based on generally accepted accounting standards and will identify the events deriving from the management of the Association on a systematic basis.

The administrative-accounting documentation must be easy to refer to and archived in accordance with appropriate criteria allowing it to be consulted with ease by both internal and external bodies authorised to carry out controls.

Responsible management staff will be required to collaborate in the correct and timely recording of all management activities in the accounting records and to operate in such a way that management events are represented correctly and on time, ensuring that the accounting and administrative systems are able to fulfil their purposes.

The responsible management will be required to give immediate notice of the presence of errors or omissions in the process for the recording of management events.

ActionAid will comply with current law in the field of tax and it undertakes to give immediate communication of all information required by law to the tax authorities, according to the time limits laid down by the same, in order to ensure the correct calculation of taxes.

4.2. INTERNAL CONTROLS

ActionAid will set up a system of internal controls (instruments, activities, procedures and organisational functions) designed to monitor, check and guide the organisation and to guarantee the application of law and regulations.

4.3. ANTI-MONEY-LAUNDERING

ActionAid will carry out its activities in full compliance with current anti-money-laundering legislation and the instructions issued by the competent authorities and it undertakes to avoid carrying out suspect operations from the point of view of correctness and transparency.

It will also prohibit the acquisition, replacement or transfer of money, goods or other utility in the knowledge of the criminal origin of the same or the conduct of other operations in relation to the same in such a way as to prevent the identification of the related criminal origin.

4.4. SMUGGLING

ActionAid undertakes to ensure that accounting and tax documentation is issued in a manner consistent with the import/export transaction actually carried out. This means making sure goods subject to border duties are brought into the country properly, paying special attention to customs rules. ActionAid is committed to checking out in advance the freight forwarders it will use and making sure customs transactions can be traced.

Any conduct that may be considered or be connected to criminal organisations, criminal associations, mafia-type associations, associations involved in tobacco smuggling or the illicit trafficking of narcotic or psychotropic substances, as well as illegal immigration, both nationally and internationally, is expressly prohibited.

4.5. PROTECTING THE ORGANISATION'S ASSETS

All members of ActionAid, regardless of their role (employees, collaborators, volunteers, directors) undertake to protect the organisation's assets, which include movable and immovable property, financial resources, tools, data and knowledge, in a diligent, fair and responsible manner. The aforementioned assets shall be used exclusively for the organisation's institutional objectives, avoiding waste, misuse or loss or damage. Any behaviour that could compromise the integrity, availability or value of said assets, even potentially, is contrary to the organisation's ethical principles. In particular, transparent, traceable and efficient management of resources is promoted, in compliance with current legislation and common interests.

4.6. PROTECTION OF THE ASSOCIATION'S NAME AND IMAGE

ActionAid's good reputation and image represent an essential intangible resource.

All Addressees will give their assurance that the Association's image must appear consonant to the prestige and importance of the role acquired by it in all communities and contexts in which it operates, acting in compliance with the principles described in this Code and in full respect of the Association's name and image.

4.7. PROTECTION OF ACTIONAID'S LOGO AND IDENTITY

ActionAid's logo, name and any other distinctive elements of its visual identity are a valuable intangible asset, expressing its mission, trustworthiness and public recognition. The use of any of these elements for personal or commercial purposes, or for any purpose unrelated to the Organisation's institutional objectives, is strictly prohibited without the express written authorisation of the relevant bodies. Any use must comply with the Organisation's ethical principles, avoiding any association that could undermine its image, reputation or neutrality. ActionAid undertakes to monitor the correct use of its logo and to take action in the event of abuse, including legal action, to protect its name and role in social contexts.

5. DATA PROCESSING AND INFORMATION MANAGEMENT

5.1. PROTECTION OF PRIVACY AND CONFIDENTIALITY

The Association will protect the secrecy and confidentiality of information and data relating to members, directors, staff, collaborators, volunteers, campaigner supporters, beneficiaries, suppliers and businesses collected by reason of, or during, the conduct of its working activities and all Addressees will be required to comply with such principles and the current legislation in force from time to time in the conduct of their functions.

All information obtained by Addressees in the conduct of their employment or collaboration duties will be the property of ActionAid. The following will be understood as information belonging to the Association:

- Personal data of Addressees and third parties. Any information relating to a natural or legal individual, body or association, which is identified or identifiable, including indirectly through reference to any other information, including a personal identification number will be considered to be personal data;
- Confidential Information. "Confidential information" will be any details of third parties of a confidential nature which, if disclosed in an unauthorised or involuntary manner, could cause damage to the same. The following is to be considered confidential by way of example: knowledge of a project, proposal, initiative, event, negotiations, understanding, commitment, agreement, a fact or event even if in the future or uncertain, relating to ActionAid's sphere of activities not in the public domain.

In compliance with current law, the Association guarantees the confidentiality of the information in its possession, requiring all Addressees to use the same for purposes exclusively connected with the conduct of their professional activities.

ActionAid will also observe the principles of parity of access and transparency in the disclosure of confidential information in full compliance with the law.

5.2. CIRCULATION OF INFORMATION

ActionAid will guarantee the transparency of the decisions it makes in the conduct of its activities. Information circulation must be managed in accordance with criteria of truthfulness, accuracy and immediacy. To such end, informative reports, whether intended for internal or external consumption, must be drawn up scrupulously and in compliance both with such principles and the law from time to time in force.

5.3. MANAGEMENT OF CONFIDENTIAL INFORMATION

Any person who, in the conduct of his or her duties, obtains knowledge of confidential/secret information will be bound by a duty of confidentiality.

ActionAid will protect confidential information arising during the conduct of its activities. It will also prohibit its staff and collaborators either from obtaining confidential information regarding other businesses, suppliers, organisations and partners using unfair or improper means or information held by the latter.

Any form of instrumental use, use for economic purposes, for direct or indirect investment, of confidential information will be in breach of the law and hence strictly prohibited.

5.4. USE OF IT SYSTEMS

The Association will use the IT resources in its possession exclusively for the performance of its activities in full compliance with the law concerning the use and management of IT systems and its defined business procedures.

In no circumstances will it be permitted to use IT and network resources for purposes contrary to law, public order and good practice, or in any case to promote racial intolerance, exaltation of violence or the breach of human rights, to commit or incite the commission of criminal offences, to damage or alter IT systems or the information of private or public third parties or to obtain confidential information by unlawful means.

No member of staff will be permitted to install software without a licence on the Association's computers or to use and/or copy documents or materials protected by copyright (audio-visual, electronic, paper or photographic recordings or reproductions) without the express authorisation of the holder.

Finally, it will be expressly prohibited to effect illegal downloads or to transmit contents protected under copyright law to third parties.

6. WHISTLEBLOWING POLICY

Responsibility for supervising the functioning and observance of this Code will be that of the Supervisory Body which has been granted autonomous powers of initiative and control, appointed pursuant to Legislative Decree 231/2001.

With regard to the supervision of the observance and implementation of the Ethical Code, ActionAid's Supervisory Body will have the powers, duties and obligations set out in the Model.

For the purposes of facilitating supervision both of employees and collaborators, the Board of Directors and the Joint General Secretaries, as the top management of the organisation, will be required to keep the Supervisory Body informed by means of specific "Reports" and "Information".

Without prejudice to compliance with all protection laid down by the law or the collective contracts in force and save with regard to legal obligations, the Supervisory Body will be entitled to receive requests for clarification, complaints or information regarding potential or actual breaches of this Code from all Addressees (members, activists, volunteers, staff, etc.).

Every breach of the principles and provisions contained in this Ethical Code by Addressees must be reported without delay to the Supervisory Body.

Reports must be filed through the SEGNALAZIONI.NET platform (at <https://actionaid.segnalazioni.net/>), which guarantees absolute confidentiality and encryption of both the reporter and the report, known exclusively to the addressee, i.e. the Supervisory Body.

On receipt of a report, the Supervisory Body will be required to follow the related procedures, thus informing the competent bodies of the initiation of the procedures preliminary to the application of possible penalties arising from the breach of the Code complained of.

All reports reaching the Supervisory Body shall be managed in absolute confidentiality.

All persons making reports in good faith will be guaranteed protection against any form of retaliation, discrimination or punishment and, in any case, the identity of the person making the report will be kept secret, save only with respect to legal obligations, the defence of the Association's rights or in the case of persons accused erroneously or in bad faith, as well as workers' rights or those of the organisation or third parties. The Supervisory Body will store the reports received in a special electronic or paper archive, which will only be accessible to members of the Supervisory Body and strictly for the purposes of carrying out the tasks described above.

7. PENALTIES

ActionAid will impose penalties through the bodies and functions with specific responsibilities in that regard, consistently, impartially and uniformly. Such penalties will be proportionate to the nature of the breaches of this Code and will comply with rules governing employment relationships.

Compliance with the rules of this Code will be considered an essential part of the contractual obligations of ActionAid's staff (including pursuant to Article 2104¹ of the Italian Civil Code) as also of any other relationship governed by law or contract.

A breach of the ethical rules or internal procedures will constitute a breach of the primary obligations

¹ Article 2104. Diligence of the Employee. – "The employee must use the diligence appropriate to the nature of the performance required, the interests of the business and by the higher interests of national production. He or she will also be required to observe the provisions applicable to the rules governing work performance and discipline imposed by the business owner and collaborators to whom he or she reports under the hierarchy".

under the employment and/or contractual relationship with all consequences of the law or contract and without prejudice to compensation of loss or damage caused to ActionAid.

The investigation of breaches, disciplinary procedures and the imposition of penalties will be effected in compliance with the law, contracts and regulations.

Any conduct in breach of this Code carried out by consultants, collaborators or suppliers connected with ActionAid under a contractual relationship not being of subordinate employment and in any case not subject to direction or supervision, may result, in serious cases, in the termination of the contractual relationship without prejudice to a possible claim for compensation whenever the Association suffers loss and damage from such conduct.

Any breach of the ethical rules and/or of the Model by directors will result in the initiation of appropriate procedures relating to the investigation of the conduct of the same including for the purpose of adopting appropriate measures.

Penalties will be imposed for the conduct of acts or omissions unequivocally intended to breach the rules laid down by ActionAid, even if the action is not carried out or the event does not occur for any reason.

Finally, either a breach committed by an Addressee of the whistleblower protection measures set out by the Organisation or the making of reports that prove to be unfounded, whether done intentionally or as a result of negligence or wilful misconduct, shall be considered actions subject to sanctions.

8. ENTRY INTO FORCE AND CO-ORDINATION WITH THE ASSOCIATION'S PROCEDURES

This Code will be adopted by resolution of the Board of Directors of ActionAid International Italia E.T.S. with immediate force and effect.

The Code will not replace the Association's current or future procedures which will continue to have force and effect to the extent that they are not in conflict with the Code.