

CODE OF ETHICS

in accordance with Legislative Decree 231/2001

approved by the Board of Directors on 06th June 2023

COOPI – Cooperazione Internazionale Via De Lemene 50 Milano Italy

Summary

| Preface | | 3 |
|---------|--|----|
| 1 | – The Organisation and its values | 4 |
| 2 | – General principles | 6 |
| 3 | - Operational Principles | 9 |
| 4 | - Assets and information of the Organisation | 13 |
| 5 | – Relations with third parties | 14 |
| 6 | - Conflict of interests | 17 |
| 7 | - Specific obligations of the operators | 18 |
| Ann | ex A: The history of COOPI | 20 |

Preface

Credibility and reputation have an inestimable importance for NGOs that work in heterogeneous economic, political, social and cultural contexts. It is therefore essential to clearly express the common values, principles and responsibilities to be adopted in interactions with contributors and financiers, with beneficiaries and the communities we work with, with our project partners, with the people who work with us and with any parties that have a vested interest in our activities.

Values and principles developed over the course of our history are consistent with our Vision and our Mission and are stated in our Chart of Values.

The Code of Ethics, with reference to the Chart of Values, highlights the rights, duties and responsibilities of all operators, co-operators, volunteers and consultants of COOPI.

The understanding of and compliance with the Code of Ethics and Conduct by all members of COOPI is decisive in guaranteeing efficiency, reliability and excellence in our activities.

A primary objective of the self-discipline which COOPI has adopted in order to fulfil the requirements indicated by the Italian law D.Lgs 231/2001 and which is expressed in the following documents:

- Code of Ethics

- Organisational and Control Model

COOPI undertakes to promote awareness of both and monitors their observance.

1 – The Organisation and its values

1.1 The "roots" of COOPI

The soul of COOPI was padre Vincenzo Barbieri (1931-2010): the founder of the association, who was also its president for the last few decades, dedicated all his life to the underprivileged, personally assisting immigrants in Italy and working on long distance projects to support children in Africa.

COOPI was founded on April 15th 1965 in Milan. Its long history started even earlier, at the end of the 50s (brief description in appendix A).

Padre Barbieri was not only the leading figure and president of this extraordinary experience, but also a stable reference point for the values, style and strategic decisions that made COOPI an important non-governmental organisation.

In 2010 the COOPI Association was turned into a Participatory Foundation, as an adequate tool to facilitate the extension of its operational responsibilities concerning the development of projects in each country and to allow governance with more flexible structures, suitable for managing the organisational complexity, with greater ability in creating networks between various departments.

Nowadays COOPI is one of the largest and most important Italian NGOs. It has a Director, several area managers and hundreds of operators working inAfrica, South America, Asia and Europe. Moreover, COOPI has a solid social membership base and thousands of friends in Italy and across the world.

Our projects and actions require outstanding specialisation, professional skills, organisational structures and financial resources. However, the values and the enthusiasm of our staff are the same as those our volunteers used to have.

COOPI's history evolves and renews constantly in order to be increasingly efficient in responding to the needs of the underprivileged all over the world. Its evolution and innovation have, however, never betrayed the original spirit of the association.

1.2 - Our Vision

COOPI dreams of a world without poverty, able to mirror the ideals of equality and justice, sustainable development and social cohesion thanks to the coming together and cooperation between all people.

1.3 – Our Mission

With the engagement, motivation, determination and professionalism of its staff, and through the voluntary contribution of those who support it in various capacities, COOPI aims at contributing to fight poverty and develop the communities it works with all over the world by intervening in emergency situations, reconstruction and development in order to achieve a better balance between the North and the South of the world, between developed and underdeveloped or developing areas.

1.4 – Chart of Values

The development of COOPI's activities in Italy and abroad is based on the safeguard and promotion of human rights, which are the inalienable and essential rights of human beings and the foundation for the creation of societies based on equality, solidarity and the repudiation of war and for the safeguard of civil, political, social, economic and cultural rights and for the so called third generation rights: the right to self-determination, peace, development and environmental protection.

COOPI repudiates any kind of discrimination, corruption¹, forced labour and child labour. Particular attention will be paid to the recognition and safeguard of the dignity, freedom and equality of human beings, the safeguard of employment and trade-union freedom, of health, safety, and of the environment. Attention will also be focused on values and principles concerning transparency, sustainable development and efficiency, as stated by International Agreements.

Below is COOPI's CHARTER OF VALUES:

- 1. **Solidarity**: Coopi aims at spreading and affirming the culture of solidarity through information and by raising awareness for the safeguard and respect of the fundamental rights of all people, as stated in the Universal Declaration of Human Rights of the United Nations
- 2. **Transparency:** Coopi undertakes to manage the collected funds efficiently and to report back to all public and private contributors
- 3. **Neutrality:** Coopi's actions are totally independent from private interests and governmental policies, keeping an equal distance from all political parties and religious confessions
- 4. **Participation:** Coopi involves local institutions, communities, associations and organisations to analyse problems and identify suitable solutions which respect the culture and customs of the benefiting communities
- 5. **Sustainability**: Coopi implements its projects enhancing the value of local facilities, economic resources and personnel in order to guarantee a concrete and long-lasting development of the countries in which it operates

¹ Here, the term is to be understood not in a strictly legal sense, but in a broader sense, covering all corruptive conduct, i.e. conduct, whether active or passive, that gives a personal benefit - or even only a promise thereof - to a person who is responsible for a decision or who is called upon to exercise a power, in order to condition his or her actions with respect to the duties incumbent on him or her.

- 6. **Responsibility:** Coopi constantly evaluates the efficiency of its interventions, checking the qualities and capabilities of local partners in order to ensure the sustainability of the project
- 7. **Transfer of knowledge**: Coopi spreads expertise so that the benefiting communities can work in an autonomous and independent way
- 8. **Innovation:** Coopi seeks to constantly enhance its expertise, by improving the methods and operative strategies needed to implement innovative and increasingly efficient approaches
- 9. **Respect for diversity and fighting against discrimination**: Coopi strives to nurture cultures and differences in its firm belief that this is a necessary condition for progress
- 10. **Empowerment of human resources**: Coopi respects the rights and upholds the safety of its collaborators and volunteers, acknowledging their professional work in compliance with the international laws and the laws of the Country in which they are working.
- 11. Climate Change: Today's climate and environmental crises threaten the survival of humanity. COOPI believes that protecting the lives and rights of present and future generations depends on making the right choices to reduce greenhouse gas emissions, halt biodiversity loss and environmental degradation, adapt to growing risks and foster resilience, and as part of its mission intends to work together with its stakeholders to reduce the impact of interventions and to promote awareness raising and mobilisation actions.

2 – General principles

Compliance with the law, with internal procedures, regulations and self-discipline codes, as well as ethical integrity and honesty are a constant commitment and duty for all COOPI partners² and must characterise the behaviour of the whole organisation.

The management of the projects and of their work must be carried out within a framework of transparency, honesty, correctness, good faith, and with full respect to the laws and rules put in place in order to safeguard the Organisation.

Conduct in line with the principles of fairness and honesty is required in the

² Operator means any person working with COOPI at any organisational level for a short or a longperiod of time regardless of the contract she/he has: volunteer, project-co-worker, employee, consultant.

performance of one's professional activities. The principles contained in the code integrate the rules of conduct that each employee is required to observe, in compliance with the general obligations of diligence, fairness and loyalty that must characterise work performance.

In no way does a conviction of acting for the advantage of or in the interests of COOPI justify, not even in part, the adoption of or the carrying out of behaviours which are dishonest or in contrast with the principles and the contents of the Code of Ethics.

Relationships between COOPI operators at all levels must be based on the principles of and behaviour marked by cooperation, loyalty and mutual respect.

2.1 – Scope of the Code of Ethics and Conduct

The Code of Ethics and Conduct refers to values stated in the Chart of Values and to the principles stated in the following international agreements:

- Universal Declaration of Human Rights of the United Nations
- ILO (International Labour Organization)'s Fundamental Conventions
- UN Convention on the Rights of the Child-CRC
- UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- Italian law on child prostitution (Law no. 269 of August 3rd 1998,)
- Code of Conduct of the International Red Cross (ICRC) and Non-Governmental Organisations in humanitarian emergencies³

It states the rights, duties and responsibilities of operators, volunteers, consultants and all those who cooperate with COOPI. It aims at safeguarding the reputation of COOPI as well as the people who work for it in Italy or abroad, regardless of the contractual agreements between the parties, by helping to prevent any of the inappropriate and illegal behavior.

The Code of Ethics and Conduct is expressed and implemented in the activities carried out and identifies a number of specific types of behaviour that are:

- encouraged, or
- are not accepted by the organisation and are therefore curbed by specific measures.

2.2 – Target audience

The target audience of the Code of Ethics are:

• The operators of COOPI without distinction or exception, within their activities and responsibilities, in the awareness that compliance with the

³ available at http://www.icrc.org/eng/resources/documents/publication/p1067.htm

Code is fundamental for the quality of their professional performance.

- All those individuals or legal entities who, for whatever reason, collaborate with or engage in a relationship with COOPI, without any exception and independently of the type of relationship and its economic nature (for example: suppliers of goods and services, contractors, professionals, beneficiaries of projects, or public administrations of international, national or local importance);
- Contributors, financiers and anyone who voluntarily contributes to support and develop COOPI.

2.3– Knowledge and circulation of the Code

The Code is brought to the attention of all those who have relations with COOPI (indicated in the previous point), both internal and external to the Foundation and its operating structure, taking care to facilitate its comprehension and implementation. The Code is made available by displaying it on the notice board, distributing it to operators in hard copy or electronic format and with a special link placed on the home page of the institutional website www.coopi.org, where it can be downloaded in open format by anyone without restriction.

The Director⁴ promotes awareness of the Code, by providing suitable means of information, training, prevention and control, guaranteeing the transparency of operations and conduct and intervening with remedial actions where appropriate.

COOPI operators in positions of responsibility must put into practice the principles contained in the Code, taking responsibility towards internal and external workers and strengthening their trust, cohesion and team spirit and being an example for all operators in complying with the code, urging them to ask questions and make suggestions on specific provisions.

2.4 – Supervisory Board

The Board of Directors of COOPI establishes a Supervisory Board to which the task of verifying the adequacy of COOPI preventative tools is entrusted.

Its characteristics are honour, autonomy, independence, professionality and continuity of action, according to the apposite regulations attached to the organisation and control model.

Its duty is to monitor the effectiveness and adequacy of the organisational system, evaluating its performance and proposing any adjustments and/or updates on specific problems or criticalities detected during the course of inspections.

To accomplish its duty, the Supervisory Board is entitled to access any information and documents of the Foundation and has autonomous powers of initiative and

⁴ Who will avail of the operating facilities and particularly of the Human Resources Department

control.

2.5 *Compliance* within the Link 2007 project.

COOPI is a member of Link 2007, a joint table of cross-examination between the main Italian NGOs.

Within such an ambit, and in the light of the similarities between the various organisations that are LINK members, COOPI intends to share skills and to develop joint preventative tools with the objective of defining common paths of compliance, at least for some of the more recurrent risk profiles and profiles of particular interest to NGOs.

COOPI's Supervision Board will therefore be able to participate at the discussion table in order to formulate proposals and make observations.

3 - Operational Principles

3.1 – Control system

The organisation develops a control system with the aim of guaranteeing compliance with the Laws and Procedures, in order to safeguard the Organisation and its assets, to manage its activities with efficiency, efficacy and quality and to supply accurate and complete accounting and financial data.

Taking on responsibility at every level and verifying the quality and effectiveness of this responsibility must become common culture.

The internal controls must therefore be judged positively, considering the contribution that they can make to reach the Organisation's objectives, as well as their contribution in the prevention of illegal behaviour, or of behaviours that are early warning signs of illegal behaviour.

The creation of an internal system of controls which is supported by clear and well known procedures must be a common commitment at every level of the organisational structure. Consequently, all of the collaborators, within the ambit of their functions, must implement the controls for which they are responsible, indicating to the person in charge any dysfunction and any suggestions for improving the internal control system.

Within the Organisation, the Management Department verifies the proper implementation of the internal monitoring system. To fulfil this task it has no restrictions or limitations on access to company data, files and assets; it is also obliged to bring to the management's attention any proposals regarding possible improvements to the risk management policies, the measuring instruments and the existing procedures, reporting periodically on the results of its activities and any anomalies detected.

3.2 – Accounting records and financial statements, prospectuses and similar documents

The Organisation complies with the laws concerning the preparation of the financial statements. It adopts all the accounting-administrative documentation required by the law and prospectuses (budget reports) that are required for the financiers.

The Organisation's accounting is guided by accounting principles that are universally recognised and regulated by the law; its annual financial statements are subject to certification by an independent auditing business. Information and data concerning the Organisation provided to third parties, and the accounting records concerning its management, guarantee truthfulness, transparency, clarity, accuracy and completeness. It follows that the information about its assets and financial situation is truthful and correct.

COOPI has defined accounting procedures which all operators shall respect; adequate supporting documentation must be kept for each accounting entry related to a transaction. This documentation must make it possible to identify the reason for the transaction that generated the recognition and the relevant authorisation, if any. Supporting documentation must be readily available and stored according to the relative procedures in order to facilitate consultation by authorised internal auditors and external auditing companies.

Personnel are forbidden to engage in conduct that may impair the transparency and traceability of financial reporting.

3.3 – Human resources

Human resources, both in Italy and abroad, are a fundamental element for the Organisation. The operators' commitment and professionalism are crucial values and conditions for achieving the goals of the Organisation.

Therefore the Organisation undertakes to develop the expertise of its operators so that they can best express their potentialities.

All operators are given the same opportunities of professional growth so that everyone can enjoy equal treatment, based on merit without discrimination as to sex, age, disability, religion, nationality, race, or political and trade-union opinions. The Organisation undertakes, while choosing its operators for overseas locations, to consider the circumstances of the country, in order to guarantee the maximum security possible.

In particular it undertakes to ensure:

- respect of the Italian law on the subject, or the law of the host country;
- a suitable and functional work environment;
- an open, cooperative and communicative relationship context that positively influences the quality of the work environment;
- conduct that facilitates the dissemination and awareness of the aims pursued by the Organisation;
- the recognition and enhancement of each person's expertise and contribution to the achievement of common goals;
- an appropriate and transparent circulation of information, needed for the regular performance and organisation of work;
- appropriate training sessions for each person's duties;
- a careful protection of privacy;
- adequate prevention and, if necessary, a balanced management of conflicts between employees;
- a constant willingness to listen to people who feel they have been the victim of actions or behaviour that are inconsistent with the above mentioned principles;
- adequate information about the living conditions and safety in the countries where the operators will be working and whilst respecting the personal health care choices of everyone.

At the beginning of the working relation each employee is given due information concerning:

1) the functions and tasks they have to carry out;

2) the wages, and terms and conditions applicable to the stipulated employment contract;

3) the procedures and regulations to adopt in order to perform the work in the safest conditions possible.

All member of COOPI are required to know the principles of the Code as well as the standard procedures that regulate the roles and responsibilities held.

Each operator is obliged to:

- abstain from behaviours that are contrary to such principles, contents and procedures
- carefully select, when applicable, their own collaborators and constantly direct them to comply fully with the Code
- request that third parties with whom COOPI operators come into contact with familiarise themselves with the Code

- report, in a timely fashion, to their own contact or to the Supervision Board, the detection of any possible cases in which the code was broken or any requests for code violations were made, whether they detected these cases themselves or whether they were reported to them by stakeholders.
- collaborate with the Supervision Board in investigating possible violations
- promptly adopt immediate corrective measures when the situation requires it and, in any case, prevent any type of retort

Any violation of the principles and provisions contained in this Code by collaborators must be promptly reported through the following link <u>https://coopi.org/help</u>.

Violation reports will be taken into consideration only when there is sufficient information to identify the terms of the violation itself and to allow the qualified officials to carry out an adequate investigation.

Retaliations following the reporting of possible violations must be reported directly to the Supervision Board itself by the parties responsible, notwithstanding the fact that they are not permitted to conduct personal investigations or to report findings to third parties except for the Supervision Board.

The organisation will act in such a way as to protect those who report code breaches against any form of retaliation, discrimination or penalisation, furthermore ensuring the anonymity of the signaling party's identity, without prejudice to any obligations imposed by law and whilst protecting the rights of people accused erroneously and/or accused in bad faith.

3.4 – Health, safety and environmental protection, public safety

COOPI makes sure that the activities carried out by its operators comply with the international agreements and standards and with the laws, regulations, administrative procedures and national policies of the Countries in which they work. In particular it pays attention to the protection of the health and safety of the workers, the environment and public safety.

COOPI asks its partners, through the procedures they have to comply with when carrying out their tasks, to take active part in the process of risk prevention, environmental protection, public safety, and health and safety protection with regard to themselves, their colleagues and third parties, always keeping in mind the situations of particular complexity which can arise from operating in critical environments characterised by unavoidable and unpredictable dangerous conditions (such as forces of nature, for example).

3.5 – Climate Change and COOPI Activities

COOPI believes that the fight against climate change requires a global and urgent response that starts with a series of daily actions and good practices that must guide a conscious mode of operation.

In its programmes, COOPI is committed to implementing all actions to anticipate and reduce disaster risk and adapt to climate change in both urban and rural contexts. In line with the "do no harm" principle, it will avoid, minimise and manage any damage caused to the environment and climate by implementing sound environmental policies and systematically assessing the environmental impact of its actions.

COOPI will collaborate with and listen to the experience of local actors and communities on mitigation and adaptation measures, including nature-based, traditional and indigenous measures. Likewise, in order to strengthen the collective capacity to reduce risks, anticipate crises, act in a timely manner and ensure the sustainability of our activities, COOPI will use scientific methods, data collection and the use of modern technologies and communication tools.

COOPI is committed to strengthening cooperation within the humanitarian system, in particular between local, national and international actors to ensure continuity of efforts to manage risks and develop sustainable interventions.

COOPI has formally adhered to the 'Climate and environment charter for humanitarian organisations' which provides for a clear commitment by the Foundation on these issues.

4 – Assets and information of the Organisation

4.1 – Using the Organisation's assets

All operators are given material and immaterial assets such as, for example, computers, printers, equipment, cars, software, *know-how* concerning activities, and strategic and economic-financial activity plans.

The protection and conservation of these assets is fundamental for the safeguard of the Organisation's patrimony. The operators shall use these assets only and solely to carry out activities concerning the Organisation and for purposes authorised by the specific functions.

4.2 – Information protection (Privacy) and guarantee of confidentiality of sensitive data

The Organisation guarantees the confidentiality of the information in itspossession

and abstains from searching for confidential data, except for instances of authorisation by the person concerned and, in any case, always in compliance with the law. It makes sure that its employees use any confidential information obtained by virtue of their relationship with the Organisation, solely for purposes related to their work.

In order to guarantee confidentiality, the Organisation ensures a high security level when selecting and using the information technology used for processing personal data and confidential information, in accordance with the current regulations concerning privacy.

COOPI undertakes to adopt adequate and preventive safety measures for all databases in which personal data are collected and stored, in order to avoid destruction, loss or unauthorised access or processing.

COOPI's activities constantly require the acquisition, storage, processing, communication and dissemination of news, documents and other data concerning negotiations, administrative procedures, financial operations, know-how (contracts, projects, reports, notes, studies, photographs, software, etc.) which, by contractual agreement, cannot be disclosed to the outside or whose inappropriate or untimely disclosure could cause detriment to the Organisation itself.

Without prejudice to the transparency of the activities carried out and to the information requirements imposed by law, operators shall guarantee confidentiality for news acquired during their working activity.

Therefore, operators shall not reveal to third parties any information concerning the wealth of technical, organisational and financial knowledge concerning the Organisation, nor any other non- public information, except where disclosure is required by law or by internal regulations.

However, the target audience of the Code cannot use internal information totheir own advantage nor disclose it outside the Organisation.

4.3 - Research, Innovation and Protection of Intellectual Property

The Organisation promotes research and innovation by all operators within the scope of their own activities and responsibilities. The intellectual result of this activity is a central and essential asset and all operators are required to contribute actively to the production, management and protection of this asset in order toallow its development, safeguarding and enhancement.

5 – Relations with third parties

5.1 - Relations with contributors

To implement its activities in Italy and abroad, the Organisation avails itself of public and private funding.

Its relations with contributors are based on honesty and transparency. Money

transfers must be made to bank accounts held by the Foundation. Payments are not permitted to bank accounts held by individuals.

In relations with public contributors in Italy and abroad, it is forbidden to give, offer or promise money or other benefits or favours that can reasonably be deemed as actions exceeding the normal standards of courtesy. It is also forbidden to exert illegal pressure on public officials, civil servants, managers, or on functionaries and employees of Italian and foreign public administrations or of EU and international public bodies or their relatives and cohabitants.

In the context of these relationships, untruthful statements may not be made in order to obtain public grants, contributions or loans.

It is forbidden to allocate sums received by way of grants, contributions or loans for purposes other than those for which they were allocated.

Private companies that intend to take part in humanitarian projects, also by supplying goods or services, are required by the Organisation to respect human rights, workers' rights and the environment.

The Organisation does not accept material or money donations from companies that produce or trade in weapons, pornography or any other matter that degrades human beings and the environment.

5.2 – Relations with Partners

Within the scope of its humanitarian activities, the Foundation promotes and supports the active involvement of local partners in carrying out its activities and pursuing its aims and goals.

Partners (institutions or associations) are chosen according to the following criteria:

- they must be independent from Italian or international political parties
- they must base their actions on the same ethical principles as the Organisation

In accordance with article 28 of the Italian law concerning Development Cooperation (no. 49/87), the Foundation does not accept dependency relationships with profit-making companies, nor being associated in any way to their economic interests.

Local partners can also be public bodies provided that the Foundation has freedom of action and decision making with respect to its stated aims and goals.

The Foundation supports the creation of local organisations, utilising and developing the skills and expertise of individuals and of the communities with the aim of giving continuity to the humanitarian action.

5.3 – Relations with suppliers

When purchasing goods, labour or services for its cooperation initiatives and humanitarian aid, the Organisation favours, if good quality is guaranteed, the technicians and providers from the country concerned.

Suppliers are selected and goods, labour and services are purchased based on objective evaluations in compliance with competitiveness, quality, affordability, price and integrity: these principles are stated and regulated according to the procedures adopted by the Organisation.

The target audience is required to comply with these principles and with the regulations established by the Organisation concerning supply contracts; in particular, it is absolutely forbidden to accept favours or gifts from suppliers, as well as to promise or assure them favourable attitudes.

Contracts stipulated by COOPI with suppliers of materials or services, third parties must be informed about the compliance of their behaviour with the code of ethics and conduct through the supplier's signature of the form "Supplier's declaration of compliance with ethical standards" attached to the procurement procedure for goods and services.

5.4 - Relations with the press and other mass media

The success of COOPI's programmes also depends on its relations with the media. COOPI operators can be assigned representation duties and therefore have to play a role in communication.

The materials to disseminate, press releases and any appeals to be signed have to be agreed upon with the Press Office. Contact with the media is held by the President and by the Press Office of the Organisation. Requests to members of the organisation for interviews and comments must be communicated to the PressOffice.

Journalists sent by the Organisation to project areas or journalists who come into contact with its members must be welcomed and guided in their work in a transparent and professional manner. The Organisation addresses the press and mass media through designated persons, who must maintain an honest, helpful, and transparent attitude.

Communications outside the Organisation must be truthful, complete and verifiable, not aggressive and respectful of people's rights and dignity.

5.5 – Participation in external initiatives, events or meetings

COOPI supports participation in external initiatives, events and meetings provided that they are compatible with its working or professional activity. These are:

- participation in conferences, congresses, seminars and courses
- writing articles, essays and publications in general
- participation in public events in general

In this regard, COOPI operators called upon to describe or supply to the outside, data or news concerning the goals, achievements and points of view of COOPI, are required to respect internal procedures and to obtain authorisation from their coordinator and agree upon contents with the relevant COOPI department.

5.6 – Relations with bodies appointed to monitor and audit

Relations with bodies that carry out internal and external audits and monitoring⁵ must be based on principles of integrity, promptness, honesty and transparency. Utmost cooperation must be given. It is forbidden to conceal information or provide false or untrue documentation as well as hinder or prevent these bodies fromcarrying out their monitoring and auditing activity.

5.7 – Relations with the Court

It is forbidden to influence people called to Court in any way in order to persuade them not to issue a statement or to issue false statements.

It is forbidden to assist those who have committed a criminal offence, to evade the investigations of the authorities or to evade the investigations of the authorities.

6 – Conflict of interests

6.1 - General rules

Any situation that may constitute or result in a conflict of interest⁶ must be promptly reported to the person in charge for evaluation and guidance. Operators are not allowed to accept money or other favours from third parties for advice or services provided related to their relationship with the Organisation.

6.2 - Family Relationships

Any decision concerning the operations of the Organisation (supply contracts, partnerships, recruitment, etc.) must be adopted with a view to the Organisation's opportunities and be based on sound evaluations and must never be dictated by personal interests or benefits, either direct or indirect. Careful assessment will be made of situations such as those described below by way of example:

- entertaining relations or starting business negotiations with parties that employ or are under the supervision of relatives or close friends;

- holding, directly or indirectly, shares of participation, that are not merely symbolic, in enterprises that intend to have or have commercial relations with the Organisation or with subjects working in the same sector;

6.3 – External working activity

Operators are not allowed to work or to supply services in connection with the Foundation to third parties without prior communication to their contact person, nor to carry out activities that are in disagreement or conflict with their duties or with the purposes and the image of the Foundation.

⁵ Internal Audit, Audit by the financiers, audit company, guarantor of the code

⁶ Having private interests in the same institutional activity sector which is managed in order to gain benefits

Fees for teaching activities or participation in conferences, broadcasts and the like are discussed with your contact person on a case-by-case basis.

7 – Specific obligations of the operators

In addition to complying with the laws, COOPI operators shall respect ethics and human rights through an even stricter attitude than that provided for by the legislator.

Moreover, the following is a non-exhaustive list of the partners' obligations:

I. Compliance with the laws and regulations

All operators undertake to adopt any necessary prevention and control measures to guarantee, within the scope of their activity, compliance with the current laws in the country they are working in as well as with the internal procedures and regulations in any geographic context and at all decision-making and executive levels.

COOPI operators that become aware of any omissions, falsifications or negligence concerning accounting or documents used for accounting records, are required to report the facts to their contact person in accordance with the procedures laid down by the regulations.

II. Non-discrimination

Operators are obliged to respect the fundamental human rights without discrimination of any kind and with particular reference to children's rights; moreover, they are required to respect the culture, religion and dignity of others.

Operators must avoid any discrimination based on sex, health, age, nationality, political leanings and religion when working with others.

III. Employment of minors

The employment of minors for project activities must be evaluated bearing in mind the rights and laws of the Country.

IV. Mobbing and Stalking

Operators shall not adopt behaviour deemed as moral violence and/or psychological persecution aimed at offending the dignity and psychophysical integrity of subordinate operators or at degrading the work environment.

In internal and external working relations nobody must be placed in a state of subjection through violence, threats, abuse of authority, offences and physical or verbal attacks, nepotism or sexual extortion. Any kind of harassment, includingsexual harassment, is forbidden.

V. Sexual exploitation

It is forbidden to enter into or solicit sexual relations with the beneficiaries of the projects. Relationships between the staff of the project/organisation and

beneficiaries are discouraged when these create unequal power dynamics. Moreover, exchanges of money, favours, employment or offers of employment in exchange for sex are forbidden.

VI. Sexual relations with minors

It is forbidden to have sexual relations with minors.

VII. Use of Drugs

COOPI operators must never work under the effect of drugs, alcohol, narcotics and generally of any substances considered to be illegal in the Country in which theywork. None of these substances are allowed in the offices and premises of COOPI.

VIII. Safety

Behaviour that endangers or could endanger the health or safety of the operators or third parties shall be avoided.

COOPI operators are responsible for safety and must promote safety by complying with the procedures of the organisation and the regulations of the Country.

IX. Involvement in Military and Political Activities

Operators shall not get involved in military operations or political activities that might disturb law and order. In broader terms, operators shall not take part in the political life of the Country in which they work.

Operators working in Italy shall not use their position in COOPI in favour ofpolitical parties.

If operators in representative positions take on a political office, they must inform COOPI's Board of Directors as this may be in conflict with their undertaken responsibility and position.

X. Use of the Organisation's tools

With reference to obligations relating to goods, operators shall:

- safeguard their personal computer and related programmes and applications in an appropriate manner and hand it back with all the data and information concerning the work carried out. These data and information must be tidily stored and recognisable
- use internet sites relevant to their work and can participate in forums or chat lines only if expressly authorised
- use the mailbox only for reasons relating to their assigned work. In particular it is forbidden to send or store offensive or sexual messages
- not use, install or copy software or other materials protected by law, unless specifically authorised

XI. Representation and safeguard of the organisation's image

COOPI operators at all levels shall be professional and courteous when representing the organisation before the public, governments, financiers, partner organisations and beneficiaries. Behaviour that may damage even the image of the organisation must be avoided.

It must be remembered that even during non-working hours, operators still represent the organisation to some extent. Therefore, the operators' private lives cannot be contradictory to the mandate and the principles of COOPI and must be appropriate to the context in which the operators work.

Operators shall behave and dress respectfully towards colleagues, partners, and local customs, cultures and religions.

XII. Unauthorised payments

Operators are not authorised to accept payments, gifts or other kinds of payments and benefits from individuals or bodies that can take advantage of programmes managed by COOPI (e.g. partners or potential partners, beneficiaries, governmental counterparts or companies supplying goods or services). The acceptance of unauthorised payments can lead to contract termination.

Operators are prohibited from using their role in COOPI to obtain services or other benefits from external parties unless approved by their direct supervisor and/or country coordinator.

XIII. Publications

Operators intending to publish articles or other documents outside the Foundation concerning the programmed activities managed by COOPI, must ask the country coordinator or the headquarters for authorisation. All reports, handbooks, training modules and other documents prepared by any COOPI operators as part of their duties, belong to COOPI. Therefore, any innovation or device designed, created and developed or built individually or together with others, belong to the Organisation.

ANNEX A) THE HISTORY OF COOPI

Annex A: The history of COOPI

To understand the genesis of COOPI's extraordinary experience, we must start from afar, from France in the late 1950s where Vincenzo Barbieri - the 'father' and founder of the association - attended the Faculty of Theology in Lyon before being ordained a Jesuit priest. He was was supposed to leave as a missionary to Chad. During his four years in France, Father Barbieri came into contact with the movements supporting the Algerian people's liberation struggle, and was involved in assisting Italian immigrants arriving in the transalpine region in search of work, and came into contact with international lay volunteering.

Instead of leaving, in agreement with his superiors, he also launched international lay volunteering in Italy.

The result is surprising: many young people write in, all very interested in the proposal.

A house is opened in Lyon to welcome the first Italian volunteers and prepare them to leave for the missions.

In October 1963, a group of lay people rented two houses in Milan. A real community is formed, sharing everything: money, hopes and commitment.

When the experience of the first two volunteers, husband and wife in Rwanda, was made public through the media, in just a few days more than 600 letters arrived at COOPI: young and old, believers, non-believers, from all over Italy, asking for more information on the activities of a lay missionary (the term cooperator was not yet used).

Under the impetus of the Second Vatican Council, the first volunteer associations began to spring up in Italy in those years, and Father Barbieri's 18 volunteers also chose to form an association.

By 1965 there were already 25 people in 10 countries in Latin America and Africa, and in Milan the organisational structure was beginning to strengthen.

COOPI began to collaborate with Don Milani, to push forward the proposal of conscientious objection to the military. It then worked with Mr Pedini to finalise the text of the law to replace military service with 24 months of civil service in developing countries.

In those years, great interest in third-world issues spread in Italian public opinion. Catholics and lay people began to organise common struggles for a goal of justice between peoples. A strong non-violent movement was formed against the war in Vietnam; communists and religious often marched side by side. COOPI unhesitatingly stood up for peace and an end to the bombing of civilians. Following Abbé Pierre's example, work camps were organised in Italy in 1968, with the proceeds going to solidarity works.

The environment was mixed, Catholics and non-Catholics worked hard and for free to help others. The non-Catholics felt encouraged by the secular status of COOPI. The Jesuits, however, did not accept the fact that Father Barbieri, a member of the order, was leading a lay association, not dependent on the religious order. So it was that, at the beginning of 1969, in agreement with his confreres, Father Barbieri left the Jesuits, while remaining a priest.

In June 1969, thanks to the willingness of the Milan City Council, COOPI moved into the Cascina to be renovated in Via De Lemene, on the outskirts of the city, in what is still its historic headquarters today. The association grew considerably during the 1970s. It was Paolo Giorgi, above all, who played a fundamental role in its strengthening and evolution. Under Paolo Giorgi, COOPI began to engage in more important programmes, financed by the Italian government, the EEC and the UN.

In the course of the 1980s, increasing responsibilities required continuous reorganisation. Administrative functions were developed by professionals returning from projects in the Global South. Also under pressure from donors, awareness-raising work in Italy began to be added to the international cooperation activities.

In 1997 in collaboration with the University of Pavia and two other NGOs (CISP and VIS) COOPI participated in the organisation of the first International University Master's Degree in Cooperation and Development in Italy. In the following years within the process of internationalisation of the Master's degree it will create the Escuela ELACID in Cartagena.

In 2010, the COOPI Association was transformed into a "Participated Foundation" as a suitable instrument to facilitate the widening of operational responsibilities concerning the development of projects in individual countries and to allow a "governance" with more agile structures suited to managing organisational complexity, with a different ability to network between different structures.

Today, COOPI is one of the largest and most important non-governmental organisations in Italy. It has a general director, several area managers and hundreds of operators working in Africa, South America, Asia and Europe. But above all, COOPI today has a strong social base and thousands of friends in Italy and worldwide.

Projects and interventions require considerable specialisation, professional skills, organisational structures and financial resources. However, the values and enthusiasm of our current cooperators are still the same as those of the old volunteers. The history of COOPI is the history of constant evolution, continuous innovation to respond ever more effectively to the needs of the weakest people on the planet. An evolution and innovation that, however, have never betrayed the original spirit of the association.

COOPI was one of the founding organisations of both FOCSIV (Federation of Christian International Voluntary Service Organisations, established in 1965) and COSV (Coordinating Committee of Organisations for Voluntary Service, established in 1966). The former was Christian-inspired, whereas COSV had a decidedly secular connotation: the fact that COOPI was part of it contributed to pressuring the government for an enhancement of secular volunteering, which led to the approval of the laws on volunteering (no. 1033 of 8 November 1966 and no. 1222 of 1 January 1972), and the one on Development Cooperation (no. 49 of 26 February 1986), which is still in force today.

In more recent years, COOPI, together with some of the largest Italian NGOs, created 'AGIRE' (Italian Emergency Response Agency), and founded the 'Link 2007' network.