



CODE OF ETHICS

of

Save the Children Italia - NGO

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Structure of the Code of Ethics

This Code of Ethics is comprised of four sections:

- The first section contains the introduction and the identification of the addressees within the scope of application of the Code;
- The second section sets out the General Principles on which the mission of Save the Children Italia NGO, and all its components, is based;
- Specific rules of conduct are detailed in the third section;
- The fourth section sets out the provisions on the implementation of the Code of Ethics and compliance monitoring modalities.

1. Introduction

Save the Children Italia NGO (hereinafter, for brevity, “Save the Children” or the “Association”) is a member of the International Save the Children Alliance. Its mission is to promote immediate and lasting changes in the life of children, sharing a common commitment to the protection of children and the prevention of all forms of abuse. Save the Children works to achieve full respect of the rights of children and adolescents, enhancing the impact of the concrete initiatives put in place in Italy and the world over through activities designed to raise public awareness often conducted in coordination with other organisations (networking).

The Association works to ensure that children in disadvantaged or emergency conditions receive psychological, social, educational and healthcare assistance, and any other form of relief and support they may need.

To pursue its objectives, Save the Children relies on the indispensable contribution of all those subjects who, with their spirit of volunteering, share and support the goals and the strategies of the Association, and collaborate with a stable operational structure.

The Code of Ethics is an official document that defines in a clear and transparent manner the set of values on which the Association bases its actions for the attainment of its objectives.

1.1 Policy on the protection of children and adolescents

Save the Children Italia aims to be an organisation that is safe for children and teenagers. All those who collaborate in any way with Save the Children Italia must always adhere to the highest standards of behaviour, in both their private and their professional life, in accordance with the provisions set out in the “Policy on the protection of children and adolescents” annexed to the Code of Ethics.

1.2 Addressees and scope of application of the Code

In the Association, the staff has roles, functions and responsibilities that implies multiple diversified and coordinated relationships: this requires of everyone both the recognition and respect of individual rights, duties and responsibilities and the recognition and respect of the rights, duties and responsibilities toward the organisation of which one is a member and towards all the persons and entities one deals with.

In the Associations, everyone is required to behave in accordance with this Code of Ethics. In particular, this Code must be complied with, and applied in every respect, by the Chairman, the General Manager, the members of the General Meeting of the members of the Association, the members of the Board of Directors, the members of the Board of Auditors, the Treasurer, all the employees, the collaborators, the volunteers and the testimonials of the Association, none excluded. This Code must be observed by all the persons and entities who, albeit external to Save the Children Italia, work on behalf of the Association, including, but not limited to: subjects in relationships of collaboration with no employer-employee rights and obligations, consultancy relationships, agency relationships or other professional service relationships, whether on-going or occasional (including subjects working for suppliers and partners). The aforementioned addressees of the Code are also required, within

the limits of their respective tasks and responsibilities, to ensure compliance with the principles underpinning this Code, and the relative rules of behaviour, on the part of third parties.

In no circumstances can the claim of acting in the interest of Save the Children Italia justify the adoption of behaviours contrasting with those described herein. In particular, adherence to standards set out in this Code shall be considered an essential element of the contractual obligations undertaken by the employees and collaborations of the Association pursuant to and to the intents and purposes of the provisions laid down in art. 2104 and ff of the Italian Civil Code. As for external subjects acting either directly or indirectly on the behalf of Save the Children Italia, the Association undertakes not to enter into and/or not to carry on any relationship with such external subjects unless they explicitly undertake to conform to the provisions of this Code of Ethics. To this end, the engagement letters and/or the agreements shall contain clauses asserting the external subject's obligation to fully adhere to this Code, and, in the event of an infringement, provide for a formal notice to conform, or the application of penalties, or even the termination of the contractual relationship.

All addressees are also asked to abstain from engaging or taking part in any form of behaviour, which, whether considered individually or collectively, may entail the commission of any crime, with special regard to the offences identified in Legislative Decree 231/01 and subsequent amendments and additions thereto.

It is up to the Supervisory Body, established pursuant to Legislative Decree 231/01 (hereinafter "SB"), to ensure compliance with the standards and the principles laid down in this Code of Ethics, and carry out control and monitoring activities on the implementation thereof, while proposing the application of appropriate sanctions, if and where deemed necessary.

1.3 Legislative Decree 231/2001

On 8 June 2001, the Italian legislative authority approved Legislative Decree 231 (hereinafter, the "Decree") setting forth the "Regulations on the liability of legal entities, companies and associations, including those without legal status" (hereinafter also "Entities" and, individually, "Entity"). The Decree introduced in Italian law the principle of the liability of an Entity for crimes committed, acting in

the interest and/or to the benefit of the Entity, by employees and/or any of the other subjects specified in art. 5 of the Decree (e.g., directors, auditors, managers and representatives of the Entity, as well as persons subject to its management or supervision), unless, among the other conditions, the Entity has adopted and effectively put in place a suitable Organisational, Management and Control Model. The Code of Ethics is an integral and substantial part of the Organisational, Management and Control Model adopted by Save the Children Italia NGO pursuant to Legislative Decree 231/01.

2. Values and general principles

In keeping with the choices of Save the Children International, the Association adopts as its own the principles contained in the *Convention on the Rights of the Child (CRC)* adopted by the General Assembly of the United Nations on 20 November 1989.

In accordance with the aforementioned principles, the Association aims to improve the way the world deals with children, so as to bring about immediate and lasting changes in their life, and ensure that every child is guaranteed survival, protection, development and participation rights.

To this end, the Association acts to promote the wellbeing of children and adolescents throughout the world, supporting the objectives, the policies and the programmes approved by Save the Children International, and promoting the above-mentioned *Convention on the Rights of the Child*. Similarly, the Association is active on the national territory, with the aim to protect and promote the rights of children and adolescents belonging to the weakest sectors of the population.

The Association has chosen, and identifies with, the following **values**, which underpin its mission and guide the actions of all those working towards its realisation:

- **Transparency** – all the persons working for the Association are personally responsible for using the resources available in an efficient

manner, and adopted the highest level of transparency in their dealings with donors, partners and, first and foremost, the children.

- **Ambition** – besides making demands of themselves and their co-workers, all the persons working for the Association, establish ambitious objectives and take action to improve the quality of all the initiatives taken to support the children.
- **Collaboration** – all the persons working for the Association pursue the ideal of mutual respect, acknowledge the value of diversity, and work with their partners joining forces at global level to improve the life of children.
- **Creativity** – all the persons working for the Association are open to new ideas, work to promote change, and are ready to assume risks to develop sustainable solutions for, and with, the children.
- **Integrity** - all the persons working for the Association always strive to behave according to the highest moral standards, without ever compromising the reputation of the Save The Children Italia, and always act in the best interest of the children.

Besides acting in compliance with their guiding principles, in connection with the tasks, the roles and the responsibilities of each person, whether acting individually or as members of boards and committees, all the addressees of the Code also observe and promote the following ethical principles, which underpin the action of Save The Children Italia:

1. **Freedom and independence:** Save The Children promotes individual freedom and independence in the pursuit of the ideals and tasks of the Association. Freedom and independence must be exercised with honesty, correctness and responsibility, in full and substantial compliance with the laws, the regulations, the bylaws, and the spirit of the agreements entered into, also through the adoption of self-regulation systems. All the persons who are part of the Association are free to express, also in motivated critical form, their opinions on the activities of the Association and the way it is governed, as long as in doing so they adhere to the principles of respect for the dignity of the individuals,

Propriety of language, loyalty to the institution, in full compliance with the bylaws.

2. **Impartiality and fairness:** The Association avoids any form of favouritism and any choice that does not arise from substantial and unwavering respect of the principle of impartiality in one's actions, prioritising in every decision the recognition and enhancement of individual skills, personal merit, in the general interest of the institution.
3. **Rejection of any form of discrimination:** The Association rejects and combats any form of discrimination, whether in terms of gender (gender equality is promoted according to the Directives, the Resolutions and the Recommendations of the governing bodies of the European Union), different abilities, religion, sexual orientation, personal beliefs, physical appearance, skin colour, language, ethnic origin, social conditions, political and trade union affiliations, nationality, personal and health conditions, pregnancy, maternity, family choices, age. Any conduct contrary to these provisions shall not be tolerated, and poses a risk to the reputation of Save the Children Italia.
4. **Value of Human Resources:** Human resources are recognised as a fundamental and indispensable factor within the Association. Accordingly, Save the Children Italia acknowledges the centrality of human resources, from whom professionalism, dedication, loyalty, honesty and spirit of collaboration is required. In full compliance with its mission, the Association guarantees the absence of any form of discrimination in the process of personnel selection and hiring, which is based solely on the a person's capacity to perform the tasks entrusted to them and develop their professional skills and expertise.
5. **Respect for the dignity of the human person:** The Association does not tolerate any form of harassment, of a psychological, moral or sexual nature, deeming this behaviour detrimental to human dignity; the Association ensures unbiased and attentive protection to the victims.
6. **Health and safety in the workplace:** The Association pursues with dedication the goal of guaranteeing health and safety in the workplace. In this connection, the Association adopts the measures deemed most

appropriate to avoid the risks associated with the execution of its activities and, should this be impossible, to assess the risks entailed, with the aim to attenuate them at the source, manage them and, whenever possible to eliminate them.

7. **Protection of the environment:** The Association strives to guarantee that its activities conform to the national and international systems of rules designed to ensure compliance with the regulations on social and environmental protection; accordingly, it undertakes to avoid any adverse impact on the environment and the communities where it is active. All the members of the Association are required to use the resources available in a responsible, diligent and optimising manner, in order to:
 - Avoid the waste and ostentatious use of resources;
 - In making use of materials and services, including external ones, ensure respect for the environment in a perspective of sustainable development.
8. **Use of the name and the reputation of the Association:** Membership and participation in the Association require unwavering loyalty to the Association, and shall not be used in any way for personal purposes. Every action carried out on behalf, or in the interest, of the Association shall not, in any way, undermine its image and respectability. All the members of the Association are required to respect its good name and not cause any harm to its reputation.

3. Rules of conduct

3.1 General rules of conduct

In their dealings with people and entities both internal and external to the Association, the addressees of this Code are expected to conform their conduct to the applicable regulations as well as to the values and principles enshrined in this Code of Ethics.

In particular, they are required to:

- Abstain from, causing, or collaborating to the realisation of behaviours that may result in the commission of the crimes specified in Legislative Decree 231/01;
- Collaborate with the SB with its monitoring and supervision activities, providing the information, data and details requested by the Body; inform the SB of any dysfunctions or violations of the Code of Ethics.

Besides complying with the provisions of a general nature described above, the addressees of this Code of Ethics shall observe the rules of conduct detailed below, which may concern both matters deemed particularly significant from the standpoint of ethics and specific aspects of the activities of the Association.

3.2 Conflicts of interest

A conflict of interest arises when the private interest of a subject belonging to or collaborating with the Association actually, or potentially, conflicts with or goes against the interests, and not only the financial interests of the Association. This conflict may also take the form of the interest of a subject external to the Association prevailing over the interests of the latter. The aforementioned private interests, not necessarily of a financial nature, may involve: a) the immediate interest of a person who is a member of the Association; b) the interest of a family member, a cohabitant, or a relative in law, a relative within the second degree or a relative in law within the second degree of a member of the Association; c) the interest of entities or legal persons over whom the Association member has control or exercises a significant management role; d) the interests of third parties, if immediate benefits may be deliberately derived from them for a member of the Association.

All addressees shall abstain from holding offices, assuming assignments, exercising functions or adopting behaviours that may entail a conflict of interest with the values, the goals and choices of the Association. Any subject whose interests, in any circumstances or any operation, conflict with the interests of the Association shall immediately notify their Line Manager, and, in any case, shall abstain from making any decisions or adopting any resolutions on the matter. Subjects having financial and/or commercial relationships with the Associations cannot be members.

3.3 Relationships with the public administration

All dealings with subjects that come under the qualification of public officials or persons in charge of a public service shall conform in every respect to the applicable laws and regulations, and the provisions of this Code of Ethics, so as to ensure the absolute legitimacy of the actions of the Association.

Within the limits specified below, the Association forbids the addressees of this Code of Ethics to accept, offer or promise, whether directly or indirectly, money, gifts, assets, services, performances or favours (also in terms of employment opportunities or in the form of activities, including commercial activities, which may be linked, whether directly or indirectly, to the employee) in connection with relationships established with public officials, or with persons in charge of a public service, with a view to affecting their decisions and securing more favourable conditions or undue services, or for any other purpose, including the performance of their official functions.

If the employees and/or the member of the governing bodies of the Association receive requests for, or offers of, money, gifts, or favours of any type, they shall immediately inform their superior in the line of command and the Supervisory Body.

3.4 Health and safety in the workplace

In order to ensure the efficacy of the measures adopted by the Association for purposes of accident prevention, hygiene, health and safety on the job, all the addressees of this Code of Ethics are required to:

- a) Take care of their own health and that of the other persons in the workplace who may be affected by their actions or omissions, based on their own training and the resources supplied by the Association;
- b) Together with the employer, the managers and the persons in charge, contribute to the fulfilment of the obligations relating to the safeguard of health and safety in the workplace;

- c) Comply with the provisions and the instructions imparted by the employer, the managers and the persons in charge, with a view to ensuring collective and individual protection;
- d) Make proper use of working equipment, the vehicles and safety devices;
- e) Immediately notify the employer, the manager or the person in charge any deficiency observed in the equipment, the vehicles and the devices specified above in d), as well as any hazard condition they may become aware of, and take action in an emergency, within the sphere of their skills and possibilities, and without prejudice to the obligation described below under letter g), to eliminate or attenuate the situations entailing severe and imminent dangers;
- f) Not remove or alter safety, indicator and control devices without permission to do so;
- g) Not perform of their own initiative operations outside their sphere of responsibilities or may compromise their own safety or that of other workers;
- h) Participate in training programmes organised by the Employer;
- i) Take the medical exams provided for by the applicable regulations or requested by the Company Physician.

3.5 Use of IT resources

In performing their professional activities, the addressees must make use of the IT and telematics tools and services in full compliance with the applicable regulations (in particular, regulations on computer crimes, data security, privacy, copyrights) and the internal procedures described in the annex.

3.6 Using the assets of Save the Children

The addressees of this Code of Ethics must protect and maintain the values and resources of Save the Children Italia, and contribute to the protection of the assets of the Association, avoiding situations that may have adverse

repercussions on the integrity and security of the assets. They are also expected to make proper use of all the instruments and resources provided by the Association, and not to use them for personal aims (e.g., by seizing items belonging to the Association for their own profit).

3.7 Advocacy and awareness raising

The principles of honesty, respect, integrity and transparency guide the of advocacy and awareness raising activities targeting the institutions in the matter of Children's rights, as well as other associated information and awareness raising activities (e.g., campaigns on the war against malnutrition, etc.).

3.8 Fund raising

In carrying our fund raising activities, the addressees of this Code of Ethics are expected to respect the values and ethical principles of the Association and the applicable laws and regulations, with the aim to promote the transparency of the activities performed by the Association in favour of the interested parties (donors, volunteers, beneficiaries of the activities, addressees of the funds, associates and members of the organisation, public and private institutions, etc.). This is done also with a view to preventing adverse effects on the brand Save the Children Italia. In their fund raising activities, the addressees shall never use any form of coercion against the donors, and shall be bound by the obligation to respect the professional dignity of the Association and the donors, and especially the obligation to respect the children, privacy, freedom of opinion, and diversity.

3.9 Confidentiality

The addressees shall respect the confidentiality of the information in possession of the Association regarding individuals, entities and institutions and shall not disclose confidential data or information. The fund raising activities shall be performed in full conformity with the privacy laws in order to protect the confidentiality of sensitive information concerning the donors.

In this connection, all the addressees of this Code of Ethics are expressly required to:

- Safeguard the donors, in full compliance with the regulations on the confidentiality of personal data (L.196/2003);
- Not disclose to third parties, for any reason whatsoever, sensitive information concerning the donors, other than as required by the law;
- File only the information deemed relevant;
- Protect donor data (e.g., protect on-line data from *phishing* and *hacking* activities).

The confidential information of which employees and/or members of the Association may become aware in performing their activities (lists of donors, personal information concerning the donors, etc.) shall not be disclosed nor made available outside the Associations, shall not be used to obtain privileged positions or benefits, or for other personal aims.

3.10 Using the “Save the Children” logo

In performing the tasks assigned to them, all the addressees are required to comply with the instructions imparted by the Association concerning the use of the logo. It is expressly prohibited to use the Save the Children Italia logo for commercial purposes or any purpose other than those provided for in the bylaws of the Save The Children Italia and in connection with its mission.

3.11 Financial statements and other accounting documents

The addressees of the Code are required to pay special attention to the preparation of the financial statements and other accounting-administrative documents.

Accordingly, they are required to:

- Collaborate with the Association functions responsible for the drafting of the accounting documents;
- Provide exhaustive, clear and accurate data and information;
- Comply with the criteria governing the compilation of accounting documents.

3.12 Reporting obligations to the Supervisory Body

The addressees of the Code are required to inform on a timely basis the Supervisory Body of any infringement of this Code of Ethics they may become aware of. All communications to the Body shall be in writing and can also be set by mail, possibly in anonymous form, to the address made available by the SB (vigilanza@savethechildren.org).

4. Implementing and monitoring compliance with the Code of Ethics

4.1 Implementation of the Code of Ethics

To ensure the implementation of this Code of Ethics, the Association shall adopt and observe all the procedures envisaged, also with a view to preventing, detecting and notifying possible fraudulent practices. The Association must adopt ad hoc measures, including but not limited to:

- Promote an ethical and transparent environment;
- Design an internal proportional monitoring and control system to measure the likelihood of occurrence of a fraudulent event;
- Adopt an appropriate investigation mechanisms;
- Adopt an efficient reporting system to inform the Supervisory Body of any fraudulent behaviour that may have occurred within the Association.

4.2 Communications to the Supervisory Body and sanctions that may be imposed

The Association shall adopt a suitable breach reporting policy with the aim to mitigate the risk of further breaches being committed within the Association.

Upon being detected, any breach of the principles and the requirements set out in this Code of Ethics by managers, employees, collaborators, suppliers or other subjects required to comply with them, shall be notified to the SB on a timely basis. In particular, the Association has prepared appropriate communication channels to facilitate the reporting process of infringements to the SB.

To this end, in particular, an ad hoc mail box (vigilanza@savethechildren.org) has been activated to receive reports on infringements of the Code and information on any aspect that may prove relevant for purposes of the application of Legislative Decree 231/2001. If the reports received require a confidential treatment, in accordance with the applicable regulations, Save the Children Italia undertakes to guarantee confidentiality and ensure that no forms of realisation, discrimination or penalisation will be applied against the whistle-blowers.

The Supervisory Body forwards the reports on breaches of the Code of Ethics, including potential ones, that may not be significant for purposes of the Legislative Decree 231/01 and the Organisational, Management and Control Model adopted by Save The Children Italia, to the structures of the Association that can make the appropriate decisions on how to deal with such breaches.

Violations of the provisions set out in the Code of Ethics and the relationship of trust established with the Association may result in disciplinary actions, revocation of powers and functions, without prejudice, for the employees, to the procedures provided for in the Charter of Workers Rights, collective labour agreements, the internal rules of the Association.

4.3 Tasks and responsibilities of the Supervisory Body

Among the other tasks, the SB is required to:

- Monitor compliance with the Code of Ethics, with a view to minimising the risk of commission of the crimes specified in Legislative Decree 231/01;
- Provide to the interested parties all the explanations and clarifications they may request concerning the correct interpretation of the provisions set out in this Code of Ethics;

- Formulate its opinions on ethical problems arising in connection with decisions to be made within the Association, as well as on alleged breaches of the Code of Ethics the SB becomes aware of;
- Monitor and coordinate the update of the Code of Ethics, also by submitting proposals to this effect;
- Promote and monitor the implementation of the activities of communication and training on the Code of Ethics;
- Report to the competent functions/offices of the Association any violation of the Code of Ethics that has occurred, propose the sanctions to be imposed, and verify their actual application.

4.4 Dissemination and training on the observance of the Code of Ethics

Save the Children Italia undertakes to ensure a timely dissemination of the Code of Ethics through:

- The distribution of this Code of Ethics to all the addressees inside and outside the Association;
- Posting the Code in a place accessible to all;
- Making the Code available to third party addressees and any other interested party through the Internet site of the Association.

To this end, Save The Children Italia asks all the addressees to sign a statement confirming that they have read and understood the Code and undertake in writing to comply with the provisions contained in it.

The SB promotes and monitors period training initiatives on the principles underpinning this Code, that it plans by taking into account the need to diversify the activities as a function of the role and responsibilities of the resources concerned.

4.5 Entry into force

This Code of Ethics has been adopted with a resolution of the Management Board on 18 July 2014, effective immediately.

