

CODE OF CONDUCT

**VOLONTARIATO INTERNAZIONALE
PER LO SVILUPPO**



Insieme, per un mondo possibile

Organismo Non Governativo - Onlus • Promosso dal CNOS - Centro Nazionale Opere Salesiane
Accreditato presso ECOSOC con Special Consultive Status • Associato al DBN - Don Bosco Network

Via Appia Antica 126, 00179 Roma (Italia) - Tel. +39 06 516291 - Fax +39 06 51629299
vis@volint.it - www.volint.it - CF 97517930018

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ABBREVIATIONS AND ACRONYMS

AICS: Italian Development Cooperation Agency
ATS: Temporary Association of Purpose
AUDEX: External Auditor
AUDIN: Internal Auditor
C/B: Bank account
CCP: Civilian Peace Corps
CE: VIS Executive Committee
COGE/COAN: General and analytical accounting.
CRFPC/Desk: Regional Finance, Planning and Control Coordinator and FPC Desk at headquarters.
CRP/Desk: Regional Programs Coordinator and Programs Desk at Headquarters.
DCOM: Department of Communication
DCRF: Campaigning & Fundraising Department.
DFPC: Department of Finance, Planning and Control
DG: Director General
DP: Program Department
EC: European Commission - European Commission
ECG: Education for Global Citizenship.
ECHO: European Commission Humanitarian Office
ED. DD/MM/YEAR: Edition dd/mm/year (last updated and/or approved)
ETM: Thematic Expert
FACQ: Purchasing function
GEST: Management
MAECI: Ministry of Foreign Affairs and International Cooperation
MoU: Memorandum of Understanding
SB: Supervisory Board (pursuant to Legislative Decree 231/2001)
NGO: Non-Governmental Organization
NPO: Non-Profit Organization of Social Utility
OOII: International Organizations
OSC: Civil Society Organization
PCM: Project Cycle Management
PDC: Chart of Accounts
PG/PRAG: Practical Guide Europeaid
PM: project manager/project leader
PN: First Note (PN file or record)
PPs: Partner Countries
PRES: President
PRMG: program manager/head of program.
RAL: Administrative Manager in Loco
RDCOM: Head of Communication & Digital Department
RDCRF: Head of Campaigning and Fundraising Department.
RDFPC: Head of Finance, Planning and Control Department.
RDP: Program Department Manager
REV: Control Body (formerly Auditor(s))
RPL: Country Manager/Representative in Loco.
RR.UU: Human Resources Department
RRU: Head of Human Resources Department
SAD: Distance Support
SAM: Supporting missionary activities
SCU: Universal Civil Service
SDGs: Sustainable Development Goals
TES: Treasurer
EU - EU: European Union - European Union

INTRODUCTION

VIS is a Non-Governmental Organization (NGO) and Civil Society Organization (CSO) of international cooperation, born in Italy in 1986, promoted by CNOS - Centro Nazionale Opere Salesiane, which - as a lay and co-responsible body - supports the traditional social commitment of the Salesians in Italy and in the countries of the Global South, inspired by Don Bosco's preventive system and Salesian educational practice. Consistent with its identity and within the framework of the Sustainable Development Goals (SDGs, Agenda 2015 - 2030) defined by the United Nations, in the face of situations of injustice that deny fundamental rights to a large part of humanity, VIS's goal is to promote concrete paths of commitment to international solidarity and peace. VIS has the legal status of an association with legal personality and is:

- NGO officially recognized by the Italian Ministry of Foreign Affairs and International Cooperation, and therefore enrolled, pursuant to Art. 26, paragraph 2, of Law 11/08/2014 No. 125, in the List of Civil Society Organizations (CSOs) at the Italian Agency for Development Cooperation, by Decree 2016/337/000285/2 of 04/04/2016;
- Non-Profit Organization of Social Utility, enrolled in the Registry of ONLUS at DR Lazio of the Revenue Agency pursuant to Art. 32, paragraph 7, of Law 11/08/2014 No. 125;
- NGO accredited with *Special Consultative Status* with the *Economic and Social Council* of the United Nations (ECOSOC) by Decision No. 226 of July 27, 2009;
- Since 2018 Partner of ECHO (European Civil Protection and Humanitarian Aid Operations Office of the European Union); the partnership was also confirmed in 2020 with the issuance of the Certificate of EU Humanitarian Partnership 2021 - 2027;
- Accredited NGO and/or partner at/of European and international institutions for the implementation of international development cooperation programs, as well as NGO officially recognized by local authorities in numerous countries it operates in.

VIS is a founding member of the Don Bosco Network, an international network of Salesian-inspired NGOs; CINI - Coordinamento Italiano Network Internazionali; and the Italian Committee for the Promotion and Protection of Human Rights. It also participates in ASVIS - Italian Alliance for Sustainable Development, FRA - *Fundamental Rights Agency Civil Society Platform* and the *EU Civil Society Platform Against Trafficking in Human Beings*.

Article 1: Function of the Code of Conduct

1.1 This Code constitutes the set of values on which the action of the VIS is based and the principles whose observance is considered of fundamental importance for the smooth operation, reliability of management, credibility and image of the VIS.

1.2 All relationships and activities carried out in the name of the VIS and/or in its interest and/or, in any case, referable to it in any way, whether carried out internally or externally, must comply with the provisions of this Code. Compliance with the rules and provisions of this Code is an integral and essential part of the contractual obligations arising from any activity and, in particular, from employment contracts (employees) and other contractual rules (collaborators or consultants).

1.3 The provisions of this Code constitute illustrative specifications of the general obligations of diligence and fidelity whose fulfillment is required by law from employees (Articles 2104 and 2105 of the Civil Code) and those of fairness and good faith required from collaborators in any capacity (Articles 1175 and 1375 of the Civil Code).

1.4 The Code of Conduct is promoted and approved by the Executive Committee (EC). The Code is subject to review by the EC itself, which for this purpose will consider suggestions and comments from all recipients of this Code, as well as any regulatory developments and any changes to the most widespread national and international procedures, as well as experience gained in the application of these standards.

1.5 This Code will be made known to all stakeholders (such as members, presidia, participants, volunteers, workers/collaborators, donors, suppliers, partners, etc.), through direct dissemination among key *stakeholders* and publication and/or promotion on VIS information channels according to the guidelines established for this purpose by the Executive Committee.

Article 2: Dissemination of the Code of Conduct

2.1 This Code of Conduct applies to the following "addressees":

- members of all social organs of VIS, such as: executive committee, members' assembly, participants' assembly, president, vice-presidents, board of auditors;
- Members of VIS principals;
- leaders of the body;
- employees, collaborators, consultants and all those who work/operate pro-tempore with VIS, respecting their professional autonomy and within the scope of the implemented interventions, wherever they work, both in Italy and abroad.

The Code of Conduct also applies to implementing partners, in Italy and in target countries, as well as to suppliers, contractors and third parties who are involved in various ways in the implementation of institutional activities.

2.2 VIS shall, where appropriate through the designation of specific internal functions, provide for the dissemination of this Code to all stakeholders, as well as:

- a) to the interpretation and clarification of its provisions, including on the recommendation of the Supervisory Board (SB) as to whether such action is appropriate;
- b) To the verification of its effective compliance;
- c) to taking measures related to the removal of violations of its rules, which constitute disciplinary offenses.

VIS shall, also in compliance with the provisions established for this purpose by the main institutional donors, publish this Code of Conduct on its website www.volint.it and make it available in the main vehicular languages. Contractual relationships and/or agreements of various kinds signed in Italy and abroad by the NGO may refer and/or refer to this link.

Article 3: Guiding Principles and Basic Characters of the VIS Activity

3.1 The inspiring principles of the activity of VIS and of those who are part in various capacities of its operational structure, in Italy and in the partner countries, are defined by the Statute of the Organization and by the General Regulations and are also specified and detailed in the Motions of the Assembly of Members and, on the level of activities, in the strategic planning and annual programming, as well as in the Social Report that is drawn up annually.

In line with the principle that "*Development is of the whole man, of every man*,"¹ VIS conceives of development only if it is integral and universal, if it grants all human beings as repositories of inalienable rights, which come with responsibility in mutual encounter and relationship.

VIS's **vision** configures, therefore, "*A world where every person can fully enjoy his or her rights and participate with dignity and actively in the life of the community by fostering its development.*" The commitment is oriented toward those most in need, the poor, where poverty is primarily conceived as a lack of opportunity. And among those living in situations of hardship and exclusion, VIS pays more attention to children and girls, boys and girls, and the most vulnerable young people, in line with Don Bosco's charism.

¹ Cf. Paul VI, Encyclical Letter *Populorum Progressio*, 1967.

This vision has led the organization to adopt an approach aimed at broadening individual and social capacities, in the dual perspective of building and/or strengthening the capacities of *rights-holders* to claim and enjoy their fundamental rights (*capacities for empowerment*), and the capacities of holders of related duties (*duty bearers*) to fulfill their obligations (*capacities for accountability*) according to the principle of responsibility. Therefore, the **mission of VIS** is "*To promote the development and enlargement of the capacities of every person-understood as an individual and as a member of a community-paying special attention to the most disadvantaged and vulnerable girls, boys and young people, providing them with educational, training and socio-professional insertion opportunities, as well as tools for the promotion and protection of their rights.*"

In summary, in partner countries VIS works with international cooperation programs, mainly through an integrated approach, to:

- educate, educate, care for and support children, adolescents and youth in vulnerable conditions and at risk of social exclusion;
- Ensure vocational training, access to employment and social reintegration of youth(s);
- Promote the human rights, in particular, of children, adolescents and women:
- Promote local community development by supporting local educational entities, training of local teachers and cadres, and development of youth entrepreneurship;
- to ensure that the interventions implemented following an emergency (conflict or disaster), put in place in the contexts in which the NGO already operates or at the request of its local partners, do not end with the cessation of the emergency itself (so-called *relief* and first emergency), but are always linked to a medium- and long-term human and sustainable development perspective;
- to promote a vision of the phenomenon of migration and the problems opened by it based on human rights: that is, the protection and promotion of the freedom and right of every person to enjoy a life of dignity in any part of the world, either by building and realizing their own existence in their own country, or by developing in safety and with prospects of success their own migration project. For this reason, VIS configures in a contextual and complementary way, on the one hand, the solidaristic duty of welcoming, promoting and including migrants and refugees in our societies, and on the other, the duty of development cooperation and promotion of rights in the countries of origin and transit for the construction of local development opportunities;
- Expand access to information and training through new technologies;
- Ensure sustainable and environmentally friendly development, particularly by enhancing biodiversity and promoting the use of renewable energy.

In Italy and Europe, VIS has among its priority goals:

- Raise awareness of issues of solidarity and international cooperation;
- Fostering international volunteerism carried out with educational professionalism and person-oriented to promote human and sustainable development;
- Train, with different and innovative methodologies, on issues and disciplines related to international cooperation and human rights;
- To carry out *advocacy* activities aimed at raising awareness and influencing institutions that, at various levels, through their actions and decisions, are able to affect the quantity, quality and effectiveness of international cooperation and poverty alleviation, the promotion and protection of the rights of children and adolescents, and the quality of education.

Programmatically, VIS conducts its institutional activities in accordance with the following principles and criteria:

3.2 In conducting its cooperation activities and, in particular, its interventions of a humanitarian nature, VIS operates exclusively for the protection and promotion of the fundamental rights of the targeted persons and communities, **independently, impartially, neutrally** and **in accordance with the principle of non-discrimination** (religious, ethnic, gender and sexual orientation, cultural, political and social), encouraging on the contrary respect for diversity, differences and pluralism. In this sense and to this end, VIS adheres to the fundamental principles and contents established by the following international documents/acts, committing itself to implementing them in its programs and promoting their knowledge and dissemination among its practitioners:

- a. *The European Consensus on Humanitarian Aid*;
- b. *Code of Conduct for the International Red Cross and Red Crescent Movement and Non-Governmental Organizations (NGOs) in Disaster Relief*;
- c. *Sphere Standards*.

3.3 VIS is aware of the position, role and function it assumes and performs in any operational context and is committed to always grant the limits and consequences of its action. It therefore adopts the **Do-No-Harm Approach** as its method of humanitarian conduct, always striving to study and understand in depth, on the one hand, target contexts and communities, including possible conflicts, the political environment and its dynamics, the socio-cultural norms and practices characterizing community life, and, on the other hand, the impact of its aid programs and related interactions within the same contexts, with the aim of limiting or preventing unintended negative effects and maximizing positive results. In cases of conflict, this approach focuses on the effectiveness of "peace-building" practices and helps humanitarian workers understand the complexity inherent in providing appropriate assistance to civil societies and people in need. The *Do-No-Harm* principle must be applied at all stages of the project life cycle, beginning with the identification of needs and problems, during design, in initiation, implementation, and in monitoring and evaluation of interventions. For these purposes, it is necessary to:

- Involve target communities at every stage of programs, fostering their participation in decision-making processes, and implement existing accountability and grievance procedures and policies by allowing feedback and precisely participation from recipients and stakeholders;
- seek to identify the connecting and dividing factors/actors/conditions within the target contexts and communities, as well as define the implications and interactions of the programs with them, so as to minimize the sources of tension, distrust and conflict, and instead develop those of trust, equality, cooperation and peacemaking.

3.4 VIS firmly believes that **gender equality and equal opportunity** must be at the core of its commitment to building effectively democratic societies and equitable distribution of resources against global inequality. Gender equality is an explicitly granted human right internationally, and VIS seeks to promote the dignity of every person, human rights, and the elimination of poverty and injustice for all genders and all ages. The NGO's commitment to this is precisely based on the human rights framework and fundamental principles, with particular reference to the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), as well as the principles and targets set out in this regard by the Sustainable Development Goals (SDGs). VIS is committed to ensuring that all people can fully access and enjoy their rights without discrimination on the basis of their gender identity, including women on an equal basis as men. To this end, the NGO will work to:

- within its own organizational and operational structure (see *Human Resources and Core Labour Standards at VIS*), through selection, training and adoption of a participatory approach, to develop a staff dedicated and prepared to apply - in Italy and in partner countries - a gender and equal opportunity perspective in every sphere of work, and the principle of "zero tolerance" with respect

to instances of sexual harassment, abuse and all forms of exploitation (see *Prohibition of conduct contrary to the Code of Conduct*);

- through its programs and institutional activities, adopting a cross-gender and equal opportunity perspective to help bridge the gender-gap that exists in decision-making centers, distribution and access to resources; gender equality and equal opportunity are in fact functional to the pursuit of the body's *mission*;
- through its policy, advocacy, communication, campaigning and training to develop its public commitment to gender equality and equal opportunity.

3.5 VIS ensures that its development and emergency programs respect the **natural environment** in which the local target communities live and the staff with whom it works. In designing and conducting its actions, it ensures that it respects and protects the environment in which it operates, both at headquarters and in partner countries. To this end, it is committed to:

- adhere to high standards of environmental compatibility in procurement (works, supplies and services) and waste management: in particular, but not exclusively, when designing civil works in the countries of intervention (new construction and/or renovation of schools, centers, etc.) preference will be given to proposals with minimal environmental impact, respectful of the existing natural heritage, not negatively impacting the lives of the communities there, and contributing to the integral development of the communities; in the procurement of equipment and office and laboratory equipment, preference will be given to supplies with only minimal impact on electricity consumption, air pollution (CO2 emissions), water consumption, and suppliers who show concern for the environment and respect for human rights;
- prevent by all means the occurrence of damage to the environment, and in any case promptly inform all those directly or indirectly affected in case of imminent risk of damage to the environment of the local community or their own;
- Monitor, evaluate and report annually on the environmental dimension in its activities and conduct;
- refer to and implement not only the basic (SDGs-related) and most widely shared international principles on the topic, but also the policies and strategies developed and disseminated by the Catholic Church and the Salesians of Don Bosco.

3.6 VIS is committed to promoting and respecting the internationally recognized criteria of **efficiency**, **transparency** and **accountability**. This commitment refers as much to the internal organization of the structure of VIS itself as to its outward action and thus to the relationships and interventions that in various capacities the organization puts in place in carrying out its activities.

The VIS is committed to the above criteria with respect to all *stakeholders* involved in different capacities in the activities of the body.

3.7 VIS ensures transparent management and reporting, both to donors and to partners and key stakeholders; grants accountability for its activities, both financially and in terms of the effectiveness of its interventions; and grants the donor contribution as essential to the fulfillment of its *mission* and the achievement of its project objectives.

3.8 VIS adheres to generally accepted standards of accuracy and technical honesty in independently presenting and interpreting data, studies, and research.

3.9 VIS's policies on **fundraising**, management, provision and use of financial resources are inspired by the principle of "*direct and indirect moral responsibility*" and are consistent with VIS's commitment to contribute to the development of an ethical economy and finance. For this reason, both in fundraising and in the management of financial resources, VIS adopts the following fundamental ethical criteria in evaluating both the lenders, donors and third parties involved in the management of the funds procured and the nature of the operations/employments made/employed temporarily or permanently:

- a) Involvement in the development, production and sale of weapons;
- b) Incitement to excessive use of alcohol, tobacco and gambling
- c) Violence against human life.
- d) Violation of human rights.
- e) Violation of the rights of children and adolescents.
- f) Violation of workers' rights as identified by ILO Conventions.
- g) Complicity with injustices committed by governments.
- h) Abuse of natural resources/damage to the environment.
- i) Fraud, money laundering, bribery and other illegal activities.
- j) Failure to comply with the principles of legality and transparency
- k) Irresponsible behaviors in marketing and sales
- l) Involvement in the pedo and pornography industry.

In particular, no relations may be established with companies or with foundations of their direct emanation and control as well as with entities, institutions, associations, committees and any other associative or non-associative entity with fundraising purposes, whose fundamental characteristics, identified on the basis of official institutional and social documents (such as e.g., statutes, regulations, directives, official mission, reports of the Boards of Directors, etc.), are per se and evidently incompatible with the aforementioned ethical principles.

In any case, relationships cannot be established that:

- Condition the independence of the VIS;
- entail the risk of effective and blatant instrumentalization of the institutional purposes of the Body with respect to commercial or profit-making purposes.

The Executive Committee decides on the establishment of such relations by resolution, which must in any case state the reasons for the decision. A summary of the decisions made must be presented annually by the President to the Members' Meeting, which, in specific cases, may request that the full text of the resolution and investigation be made known to him.

If, even in the presence of a positive compatibility screening conducted according to the criteria specified above, information or news of possible conduct by partners emerges via the Internet or other means of communication that is even potentially contrary to said criteria, it will be the Shareholders' Meeting that will proceed to an assessment on the existence of reasonable guarantees of compliance with the adopted ethical criteria and/or on the profiles of a high risk for the image and credibility of the NGO and to take the relevant decision, also giving indications about specific guidelines and/or conditions to which any agreements must be subjected.

Without prejudice in any case to the obligation of compliance with the provisions of this Code on the relationships established and on the subject of consequent sanctions, should news and information subsequently emerge with respect to possible conduct of partners, unrelated to the relationship with the VIS but incompatible with the aforementioned ethical criteria, it will be necessary to proceed with a new evaluation by the Shareholders' Meeting in the terms indicated above.

3.10 In line with its mission and strictly bound to its institutional purposes, VIS's fundraising and fund management activities are always and in all cases carried out exclusively for the benefit of the recipients of institutional activities and in order to improve the NGO's operational capabilities.

3.11 The economic and financial sustainability of the body and that of its structure are an essential and necessary value to ensure its continuity as well as the efficiency and effectiveness of its interventions. However, in any case, the value of sustainability should in no way lead the recipients and partners of the VIS to violate the principles contained in this Code in order to obtain favorable economic results.

Article 4: Prohibition of behaviors contrary to the Code of Conduct

4.1 The pursuit of VIS's interest can never justify conduct contrary to applicable national and international laws, the provisions of the Organizational Model and this Code of Conduct, contracts entered into by VIS, statutory rules, internal regulations, and other applicable rules by those acting within VIS.

4.2 The addressees of this Code may not act in such a way as to damage the dignity of the human person wherever he/she may be and in whatever relationship he/she may enter with the body, as well as the credibility and reputation of the VIS, regardless of the criminal liability of such conduct. Such behaviors will be considered even more serious if carried out in the exercise of an apical function (i.e., of a granted and dominant power within an employment relationship of collaboration or subordination). If the behaviors enacted violate the legal norms of the countries in which the NGO operates, these acts will be considered extremely serious.

In particular, the following obligations are relevant:

- Prohibition of the use of alcohol or drugs: it is prohibited to use and/or provide alcohol, drugs or similar substances when working and, in general, in the workplace, in Italy and at operating sites abroad;
- prohibition of possession of pornographic material: it is strictly prohibited to possess and/or share pornographic material, in electronic or paper media, on the premises, warehouses, areas or in any other appurtenance of the NGO and its partners, through its website, its e-mail addresses or any of its publications;
- Prohibition of explicit or implicit request for sexual relations, whether paid or in kind: it is strictly prohibited to ask for sexual relations, whether paid or in kind, either in the workplace or in any other similar environment, or in any case where such personal conduct may harm the dignity of the recipient and damage the credibility and reputation of the organization;

Finally, it is forbidden to exert pressure of any kind on a person called to make statements to judicial authorities in order to prevent or alter (falsely) his or her testimony. It is also forbidden to aid those who have committed a criminal offense, evade the investigations of judicial authorities or avoid the searches and investigations carried out by them.

4.3 VIS has a policy of "**zero tolerance**" with regard to the abuse and exploitation of people, in particular, of children and the recipients of its interventions, and is committed to ensuring that all of its workers and collaborators, visitors, assignees, suppliers, sub-contractors and *implementing partners* operate with respect for and protection of the fundamental rights and dignity of people. For this reason they constitute fundamental and unwaivable principles:

- i. Sexual abuse and exploitation in any way perpetrated by aid workers constitute very serious acts of misconduct and are in themselves grounds for termination of employment. Furthermore, such acts must be reported to the appropriate authorities, both local and international, for prosecution and sanction.
- ii. Sexual activity with children and youth (i.e., with people under the age of 18) is prohibited regardless of what is considered "age of majority" or "age of consent" locally. Misconception about the age of a child/youth is not a defense. With regard to Italian citizens, it is noted that sexual activity performed with children is punishable by law regardless of the country in which the offense is committed.
- iii. The following are prohibited: any form of exchange of money, labor, goods or services for sex, as well as sexual favors or other humiliating and degrading forms of exploitation. This also includes the exchange of assistance owed to the recipient(s) in exchange for sexual services.
- iv. Sexual relationships between humanitarian workers and intervention recipients are prohibited in any case because they are based on inherently unequal will/power conditions. Such relationships undermine the credibility and integrity of humanitarian work.
- v. If a humanitarian worker has concerns or suspicions of sexual abuse or exploitation by a fellow worker, whether or not the worker belongs to the same organization, he or she must urgently report

- such concerns or suspicions through the *whistleblowing* procedure (see relevant article of this Code of Conduct) to report wrongdoing as formalized in the VIS Management System.
- vi. All humanitarian workers have an obligation to create and maintain an environment that prevents the risks of sexual exploitation and all forms of abuse, and to promote the application of the contents of this Code of Conduct. Managers and managers, at every level, have a specific responsibility to support and develop systems that ensure this type of environment.
 - vii. VIS workers and collaborators, as well as any entity acting within the institutional activities of the NGO (e.g., partners, suppliers, interns, etc.) may not:
 - Punish and/or chastise children beneficiaries in any form;
 - Have behaviors that discredit, humiliate, belittle or degrade the dignity of children or otherwise perpetrate any form of physical and/or emotional abuse.
 - Use inappropriate language or engage in harassing, offensive, sexually provocative or degrading conduct in the presence of children;
 - discriminate or manifest substantially differential, unequal or favorable treatment for some children over others.
 - viii. If VIS workers and collaborators ascertain or have suspicions of conduct by representatives or collaborators of international or local partners that may constitute allegations of abuse, harassment and exploitation, they must urgently report such conduct to the SB through the *whistleblowing* procedure. The substantiated acts resulting from the investigation conducted by the SB will be brought to the attention of the Executive Committee so that the characters of the relationships with the partner specifically involved in the case can also be evaluated. The Executive Committee may also involve the Shareholders' Meeting in the assessment.

Article 5: Obligations of diligence, loyalty and consistency with Salesian inspiration

5.1 The quality and strength of the organization is the result of the effort and commitment of all its personnel. Everyone is directly responsible for the actions taken in the performance of his or her duties.

5.2 Each staff member is required to fulfill, with diligence and loyalty, the obligations related to his or her position and is also required to respect and protect the assets of the institution through responsible behavior and in accordance with what is defined by internal regulations, including disciplinary regulations, this Code, the law, and collective bargaining.

5.3 Each staff member must be aware of the Salesian inspiration of VIS, and is therefore obliged to assume behaviors, work and non-work, that in the performance of duties manifest a consistency with that inspiration.

5.4 All VIS personnel shall refrain from participating, even indirectly, in the activities of secret associations or associations or bodies with criminal or terrorist aims or which otherwise pursue political aims through organizations of a military nature.

5.5 Personnel collaborating in any capacity with VIS, in keeping with the principles of communion and sharing between Salesians and lay people in the spirit and mission of Don Bosco,² must refrain from practicing, suggesting, implementing, permitting or tolerating, in the context of the NGO's activities both in Italy and abroad, styles and conduct of life that differ from Christian principles and inspiring ethical principles and in any case that are in conflict with the dignity of life and the human person and with the rights of the same.

² See: *Salesians and lay people: communion and sharing in the spirit and mission of Don Bosco: documents of General Chapter 24 of the Society of St. Francis de Sales*, Proceedings of the General Council of the Salesian Society of St. John Bosco, General Directorate Don Bosco Works, Rome, 1996.

5.6 Every person targeted and/or involved in VIS activities and projects, in Italy and in partner countries, regardless of ethnicity, gender and sexual orientation, religious denomination, political thought or social condition, must be treated with respect and dignity; no one will be subjected to physical, sexual, psychological or verbal harassment or abuse.

Article 6: Human resources and basic labor standards at VIS.

6.1 In addition to the provisions of Articles 2 and 3, with reference to the human resources employed by the organization, it is more specifically noted that VIS will never make use of forced or otherwise bonded labor.

6.2 VIS will never employ female workers below the age stipulated by the legal regulations set to protect the employment of child(ren) and adolescent(s).

6.3 Every employee of the institution will be treated with respect and dignity and will not be subjected to physical, sexual, psychological, or verbal harassment or abuse.

6.4 Employees and collaborators shall be employed under regular employment contracts, no form of irregular employment or otherwise established in violation of labor and tax and social security laws being tolerated.

6.5 Human resources represent one of the main factors of success for VIS from both an institutional and an organizational/operational standpoint. All employees must be made aware of the regulations governing the performance of their duties and the consequent behaviors to be maintained, bearing in mind not only their rights and the opportunities for growth that they can enjoy, but also the duties and obligations that the employment relationship implies.

The employee, in particular, is entitled to:

- to the performance of the functions inherent to his or her qualification while being able to be assigned to another function, taking into account operational needs and in compliance with the laws and national collective bargaining of labor;
- to the economic and normative treatment provided by laws and collective, associative and individual labor contracts;
- to the protection of safety and health in the workplace, which must comply with current safety and hygiene regulations;
- to legal assistance in cases expressly provided for in collective and individual contractual regulations.

6.6 VIS offers all employees and collaborators the same opportunities, on the basis of merit criteria and in compliance with the principle of equality and equal gender opportunity, and enables everyone to develop their aptitudes, skills and competencies, arranging, according to the contingent possibilities and conditions, training programs and/or refresher courses.

6.7 Consistent with the body's commitment to **gender equality and equal opportunity** as fundamental principles and features of its action, VIS is committed to ensuring:

- That human resource policies and practices are developed from a gender and equal opportunity perspective;
- an ongoing information and data collection on gender balance in the workforce and governance structures, along with average salary levels;
- targeted strategies to redress any evidence of gender inequality and imbalance in diversity and pay levels;

- Develop staff and partner capacity and skills in gender equality and diversity and ensure that all operational plans, tasks, and evaluations reflect a commitment to gender equality and equal opportunity;
- "zero tolerance" with respect to instances of sexual harassment, abuse, and all forms of exploitation and discrimination.

6.8 According to the applicable labor contracts, whether collective, associative or individual, as well as the rules established by the Civil Code and the law, the employee and collaborator are assigned precise duties. He/she must act loyally and conscientiously in order to comply with these obligations, adhering to the behaviors set forth in this Code of Conduct in the performance of the services required. In particular, each employee shall:

- to be familiar with and comply with current regulations, processes, procedures and guidelines of the Body as well as the principles contained in this Code;
- Observe the regulations and instructions given by the NGO management;
- Fulfill all obligations necessary for the protection of safety and health in the workplace;
- provide colleagues, managers and/or their supervisors with appropriate cooperation, communicating all information and putting in place all behaviors that enable them to operate as efficiently as possible in the execution of assigned tasks and in the pursuit of common goals;
- Have conduct and use language and dress appropriate to the work environment;
- acquire the professional skills essential for the performance of their work and maintain, throughout the duration of the employment relationship, an adequate level of knowledge and experience, constantly updating their preparation and attending any refresher or retraining courses proposed and activated by the Body.

6.9 Relations between the collaborators and/or employees of the SIA must be conducted according to the principles of civil coexistence, transparency, trust and integrity, in mutual respect and ensuring the protection of the rights and freedoms of persons. Relations between the different positions within the Body must be marked by the principles of loyalty and fairness and must be inspired by the principle of shared responsibility having as a common goal the interest of the Body and in order to contribute together to the achievement of its purposes.

6.10 Those in charge of individual activities must exercise the powers associated with the delegation received, respecting and guaranteeing the dignity of their employees and fostering their professional growth.

6.11 Any conduct, in Italy and in partner countries, which, directly or indirectly, involves offense, denigration on the grounds of ethnicity, religion, language, sex, nationality, origin, or which configures any form of discriminatory behavior, is prohibited.

6.12 VIS, within the framework of the project activities conducted in the partner countries, undertakes to employ as a priority and to professionally enhance local human resources, without any discrimination, in compliance with the labor regulations of the country in which they operate, guaranteeing in all cases compliance with international labor protection standards.

Article 7: Working conditions of VIS staff.

7.1 The protection of working conditions is considered as a primary value by the SIA, which is obliged to adopt in the exercise of its activities those measures which, according to the particularity of the work, experience and technique, are necessary to protect the physical integrity and moral personality of the workers and collaborators, including volunteers, following an assessment of health and safety risks, the aim of which is their elimination or reduction to a minimum in relation to the knowledge acquired on the basis

of technical progress. In the case of volunteers and workers present in partner countries, the assessment of working conditions and safety risks is made taking into account both generally recognized and internationally adopted standards in the field of non-governmental cooperation and the specific characteristics and peculiarities of local contexts.

7.2 VIS shall ensure working conditions that respect the dignity of the individual and the principle of fair remuneration.

7.3 All persons in charge of the entity's activities are responsible for adopting the measures referred to in the preceding two paragraphs, within the scope of their respective powers and responsibilities.

Article 8: Relations with public officials, identification and management of contractors, relations with partners

8.1 VIS employees shall not promise or pay sums or goods in kind of any amount or value, or any other benefit, to Italian and foreign public officials to promote or favor the interests of the institution, even as a result of unlawful pressure.

8.2 Various forms of aid or contributions which, in the form of sponsorships, advertisements, appointments, consultancies, et similia pursue the same prohibited purposes are prohibited, because they are considered to be circumventing the provisions of the preceding paragraph.

8.3 Anyone who receives, expressly or impliedly, requests for the benefits referred to in the preceding two paragraphs from public officials must immediately suspend all relations with the applicant and immediately inform his or her immediate superior and, in any case, the Supervisory Board.

8.4 VIS shall identify its contractors through appropriate procedures that must be transparent, certain and non-discriminatory, using criteria referring to the competitiveness of the services and products offered and their quality. To this end, VIS adopts ad hoc procedures, to be implemented in Italy and in the countries where the NGO operates, adapting them, if necessary, to the more restrictive *procurement* procedures provided by institutional donors or local Authorities.

8.5 All VIS employees are prohibited from accepting benefits of any kind from suppliers such as might improperly influence their work or even appear to be directed to do so.

8.6 VIS seeks and selects its consultants/advisors with absolute impartiality, autonomy and independence of judgment and requires them to comply with the principles contained in this Code. Written form is mandatory for all relationships with companies and freelancers, i.e. through a contract or engagement with mutual commitments signed by the parties. The contract and letter of assignment must clearly and specifically state the costs and other charges of the service.

Each contract/assignment letter must include a clause through which the VIS informs the contractor about the provisions of this Code of Conduct, Legislative Decree 231/2001 and the need to comply with its provisions.

Each VIS employee involved in the assignment must monitor the results of the advice provided, maintain the documentation produced, and report any changes or distortions from the original agreement to his or her supervisor or, if there is a risk under Legislative Decree 231/01, to the Supervisory Board (SB).

8.7 All VIS personnel are prohibited from engaging in the following additional behaviors with regard to dealings with the Public Administration (PA):

- perform services in favor of external parties in relationship with the NGO, consultants, partners and collaborators in general that do not find adequate justification in the context of the contractual

relationship established with them, or in relation to the type of assignment to be carried out and current local practices;

- Propose business opportunities that may benefit PA employees in a personal capacity or grant other advantages of any kind (promises of employment, etc.) in favor of PA representatives, or in any case parties related to them;
- make monetary donations and gifts to public officials or receive them outside the scope of generally accepted practices. In particular, any form of gift to Italian and foreign public officials, or their family members, that may influence their discretion or independence of judgment or induce them to secure any advantage for the VIS is prohibited. Permitted gifts are always characterized by the smallness of their value or because they are intended to promote the "image and credibility of the Association." All gifts offered-except those of modest value-must be documented in a suitable manner to enable the SB to conduct verifications in this regard;
- Communicate untrue data to the PA, prepare and provide false documents, omit due information;
- Breach PA information systems in order to obtain or manipulate information for the benefit of the Association.

8.8 VIS considers it fundamental and strategic to carry out its institutional activities in cooperation with partners, both Italian and international.

In the selection and management of partners, VIS operates in such a way as to maintain consistency with its vision, mission and principles, and in such a way as to avoid the existence of particularly favorable or unfavorable conditions regarding the implementation of a project. Therefore, to this end, this Code of Conduct is circulated among partners in Italy and abroad, and the following aspects are evaluated with reference to them:

- partners must be guided by ethical principles equal to, comparable to, or consistent with those of VIS;
- partners must be well known in the area of interest and have recognized skills and professionalism in the implementation of the projects in which they participate;
- partners must ensure administrative and accounting transparency and comply with local taxation and labor regulations;
- partners must comply with the obligations signed with VIS in special "*MoUs - Memorandum of Understanding*" or "*Partnership Agreements*" and must not impede the proper and smooth execution of an intervention. In the event that a partner acts in such a way as to violate the principles of this Code, this must be reported immediately to the CE and the SB.

Article 9: Relations with funders and donors

9.1 For the development of its activities in Italy and abroad, VIS relies on private and public funding. Communication to individual donors and to the general public must be marked by maximum transparency, so that they are enabled to make their donations in a fully informed and, as far as possible, purposeful manner. Where the donor does not specifically direct his or her donation, it should be understood as institutional support of the Body, and therefore intended exclusively for the pursuit of its statutory purposes and the implementation of related activities.

9.2 In dealings with donors, untrue statements may not be made in order to obtain public disbursements, contributions or funding.

9.3 It is forbidden to allocate sums received by way of disbursements, contributions or financing from the above-mentioned parties, for purposes other than those for which they were allocated, except in cases of supervening impossibility of achieving the purposes predetermined by the private donors, subject to the decision of the Executive Committee and subsequent information of the relevant donors.

9.4 Towards donors and funders, in particular, VIS is committed to:

- Ensure, in compliance with privacy regulations, adequate information regarding its operations and all relevant *stakeholders*: funders, donors, supporters, partners;
- Provide truthful information about the purpose and aims of its projects, ensuring first and foremost respect for the dignity of each person;
- Be aware of and responsible for all *fundraising* and communication actions, even in the case of those delegated or carried out by third parties;
- Implement appropriate and transparent accounting records and management and control procedures in compliance with applicable regulations and any certifications;
- Combat and eliminate corrupt practices and illegitimate favors carried out within the Body and/or by external parties;
- Entrust independent and experienced entities with the audit of its annual financial statements, which must be made available at its premises and made public in accordance with the standards, if any, and consistent with the criteria of transparency and accountability adopted in the industry.

Article 10: Rules on the use of goods and the use of the network and electronic devices

10.1 Employees of the institution shall be directly and personally responsible for the protection and preservation of the institution's property entrusted to them in the performance of their respective duties, as well as for the use of the same in compliance with the established rules on the preservation and protection of property and other legal regulations.

10.2 The Internet connection made available, telephone, fax, e-mail, and electronic/computer equipment should be used for the indispensable time and only for work purposes, as well as, during the performance of institutional activities, personal cell phones.

10.3 Employees of the institution may not proceed to directly install programs on personal computers, nor to duplicate or remove installed programs, unless expressly authorized by the President or, upon express delegation, by the DG or the head of the technical department.

10.4 The use of the institution's computers, fax machines, printers and copiers for personal needs is prohibited.

10.5 Employees granted access to the internal network or the Internet or the e-mail system are not permitted to: (a) downloading software or music files or keeping files on the internal network that are not strictly related to the performance of the duties to which they are assigned; (b) using for personal reasons, except with express written authorization, electronic mail or network services or so corresponding with any underage users without the written authorization of the exercisers of parental authority over them; (c) perform acts aimed at evading the controls on the use of electronic mail and the Internet that the entity may carry out in accordance with the law, including occasional or occasional acts, whether in collective mode or on named or individual devices and workstations; (d) perform acts aimed at preventing the continuity of work activities through the use of electronic mail and the Internet in their absence.

10.6 In anticipation of the possibility that in the event of absence and for work-related needs the content of e-mail messages addressed to them may need to be known, the personnel of the institution must allow another person, possibly designated by them in advance, to check the content of the messages and forward to the management of the institution those considered relevant to the performance of work activities

Article 11: Use and protection of information

11.1 The knowledge developed by the Body constitutes a fundamental resource that every recipient of the Code must protect. All Recipients of this Code of Conduct are obliged to ensure the utmost confidentiality of information handled by reason of their job function.

11.2 Therefore, recipients are required not to disclose to third parties information regarding the Body's design, technical and financial knowledge assets, as well as other non-public information, except in cases where such disclosure is required by laws or other internal regulations.

11.3 In carrying out its activities in Italy and abroad, VIS collects a significant amount of personal data relating to donors, supporters and recipients which it undertakes to process in compliance with all applicable privacy laws in the jurisdictions in which it operates and with best practices for the protection of privacy. To this end, VIS ensures a high level of security in the selection and use of its *information technology* systems designed to process personal data and confidential information in accordance with applicable privacy regulations.

11.4 The VIS places at the basis of its data and information management system, revised following the entry into force on European territory of Regulation 679/2016 (*General Data Protection Regulation*), a specific Policy for the Protection of Personal Data, which constitutes the fundamental assumption of commitment by the entity with respect to all stakeholders of its Privacy system (users, workers, collaborators and employees, suppliers, Guarantor, etc.). In particular, the VIS commits itself before all stakeholders to observe a series of behaviors regarding the protection of personal data, which are primarily specified in the Organizational Model 231/2001 and in the documents pertaining to the related processing, to which this Code of Conduct refers both for further study and concrete implementation.

Article 12: Relations with the press and other mass media

12.1 VIS addresses the press and mass communication organs only through the statutory organs and through the internal managers delegated for this purpose. These operate with an attitude of utmost fairness, helpfulness and transparency, respecting a communication policy that must be truthful, nonviolent, and respectful of the rights and dignity of the person.

12.2 In any case, information and communications relating to the Body and intended for the outside world must be accurate, truthful, complete, transparent, and not contrary to the principles set forth.

12.3 In particular, with regard to communication processes, VIS is committed to the following principles:

- Ensure the proper use of images of minors and sensitive information, using them only for statutory purposes;
- to communicate and promote in its communication activities, awareness-raising in fundraising campaigns, objective knowledge and the reality of the countries targeted, without discrimination on the basis of gender and sexual orientation, ethnicity, religion or other nature, and without using in a deformed way - for the purposes of its initiatives - the information and images specially collected;
- To be open and available for discussion, with respect to its "policies" and the ways in which it implements interventions, to its social base and other stakeholders;
- to maintain adequate communication internally with members, supporters, collaborators and volunteers, communicating strategies, programs and any useful information for effective participation and development of association life.

Article 13: Prohibition of conflicts of interest

13.1 Recipients of this Code, exercising their functions - at different levels of responsibility - must not make decisions or carry out activities that could be in conflict of interest with those of the organization or incompatible with its mission and/or values. Any situation occurring in violation of this rule must be immediately reported to the SB. In this case, the person concerned must refrain from participating in discussions and evaluations regarding the operation/act.

In addition, conflicts of interest between business and personal and family economic interests and activities carried out within the NGO structure must be avoided. Finally, it is noted-as later detailed-that no recipient may obtain personal benefits from activities carried out in the name of and/or on behalf of the organization.

13.2 It is forbidden for anyone to use information acquired in the course of the performance of his or her duties for purposes unrelated to the performance of those duties.

13.3 Information that is legitimately disseminated must be complete, transparent, understandable and accurate.

13.4 In the performance of any activity and, in particular, in procurement (of works, purchases and services), in the selection and management of RRUUs, in the conferral of assignments and treatment of any kind, VIS operates to avoid incurring situations of conflict of interest, real or even only potential, and all its employees and collaborators, in Italy and in partner countries, are required to comply with this way of operating.

13.5 Conflicts of interest include cases where an employee of VIS also acts for the satisfaction of interest other than that of the entity and the recipients of its work, for personal benefit. Where situations of potential conflict may arise, it is obligatory to notify one's supervisor in order for the matter to be resolved.

Article 14: Disclosure to the Supervisory Board (whistleblowing and other disclosures)

14.1 VIS has adopted a procedure for reporting wrongdoing to the Supervisory Board, in accordance with EU Directive No. 1937 of 2019 and Legislative Decree 24 of 2023, which is available to all interested parties on the entity's website. This is the ***Procedure for the protection of persons who report unlawful acts (Whistleblowing)***.

14.2 The whistleblowing procedure allows any person linked to VIS by a relationship of a working or professional nature to report violations of the entity's Organizational Model or mandatory regulations to the Supervisory Board, as long as they are related to the protection of the public interest or the integrity of the entity and not to mere complaints or personal claims, with a guarantee of confidentiality and with the protective measures identified by law and described in the procedure, starting with the prohibition of retaliation.

14.3 The whistleblowing procedure is an integral part of this Code of Conduct.

14.4 Individuals who wish to make reports to the Supervisory Board in the ordinary way, or who do not fall under the prerequisites provided by the procedure for reporting wrongdoing in the whistleblowing mode (because they are not linked, for example, by a working or professional relationship with VIS), may send information or suspicions of violations of the provisions contained in the Code of Conduct and VIS Policies in the following ways:

- an e-mail message to the following e-mail address reserved for members of the Body: odv@volint.it;
- by regular mail: by sending a sealed envelope marked "ODV - Confidential" and addressed to Organismo di Vigilanza, Volontariato Internazionale per lo Sviluppo, via Appia Antica 126, 00179 Rome;

- by phone: by calling +39.06.516291 and leaving a phone number to be contacted by a member of the Supervisory Board or the VIS President;
- in person: by requesting a specific meeting with the VIS Chairman or a member of the Supervisory Board at the headquarters.

VIS guarantees the confidentiality of the proceedings, the secrecy of the identity of the informant, any person suspected and/or involved and heard during the investigation, inquiry and handling of the complaint.

Article 15: Inspection activities of the Supervisory Board

15.1 Each VIS staff member shall give full cooperation to the inspection personnel assigned by the Supervisory Board to conduct *compliance* audits.

15.2 All required information and documentary evidence should be provided to the auditors during *compliance* audits.

15.3 In the event of a report of anomalies and nonconformities by the *compliance* auditors, each employee/employer of the entity shall take all necessary steps to transpose the required corrective or preventive actions.

15.4 The same rules of conduct must be observed, in the context of activities that adopt a quality management system or individual elements of it, during first-, second- and third-party audits.

Article 16: Penalties for violation of the Code of Conduct

16.1 VIS shall not permit violations of the provisions contained in this Code.

16.2 Any violation carried out by the employee(s) constitutes a disciplinary infraction and entails the sanctioning consequences set forth in Article 7 of Law No. 300 of May 20, 1970, Articles 2119 and 2106 of the Civil Code, Legislative Decree No. 231 of June 8, 2001, and the collective and regulatory regulations applied.

16.3 Any violation by coordinated and continuous collaborators, self-employed workers and external collaborators in general is a source of contractual liability and as such is sanctioned according to the general principles of law and the rules governing the relevant contractual relationships.

16.4 Any violation by managers shall be punished in accordance with the statutory and regulatory rules and applicable civil and criminal legislation.

Article 17: Principles of the verification activity of the Supervisory Board

17.1 The audit activities carried out by the Supervisory Board are based on the following guiding principles aimed at ensuring the completeness, impartiality and effectiveness of the audit:

a) Ethical behavior

During the *Compliance* audit, behavior based on: trust, integrity, confidentiality and discretion will be maintained.

b) Unbiased presentation

The auditor will faithfully and accurately report audit findings, conclusions and reports, reporting significant obstacles encountered during the audit and unresolved divergent views between the audit team and the audited organization.

c) Adequate professionalism

Auditors will base the content of the audit report on their professional knowledge, supplemented with information recorded during the audit.

d) Independence

Auditors will maintain a state of objective thinking during the audit process to ensure that audit findings and conclusions are based only on audit evidence.

e) Evidence-based approach

Audit evidence will be verifiable. They will be based on samples of information available and indicated in the audit report.

Article 18: Proper practices in administrative management and accounting records

18.1 VIS shall develop and adopt administrative and financial management procedures governing every aspect and area relevant to the conduct of institutional activities in Italy and in partner countries. All employees of the NGO, within the scope of the functions they perform, must adhere to these procedures. The procedures are inspired by the principles and criteria highlighted below.³

18.2 Those VIS staff members who, according to their respective responsibilities, intervene in the management of accounting records are obliged to:

- a) to behave correctly, transparently and cooperatively, in compliance with the law, internal procedures and the principles of accountability of the sector, in all activities aimed at the formation of the budget and final financial statements and other social communications, in order to provide the members and any other stakeholder of VIS with transparent, truthful and correct information on the economic, patrimonial and financial situation. In this regard, it is expressly prohibited to:
 - o Prepare or communicate data that are false, deficient or otherwise likely to provide an incorrect description of economic, asset and financial reality;
 - o Omit to report data and information required by current regulations and procedures regarding the economic, asset and financial situation;
- b) Comply with the principles and requirements contained in the instructions for the preparation of financial statements and periodic reports governed by the law and sector regulations;
- c) To ensure the smooth operation of the Association and its governing bodies, guaranteeing and facilitating all forms of internal control over management, as well as the free and proper formation of the will of the assembly;
- d) to carry out with timeliness, fairness and good faith all the communications required by law by not placing any obstacle in the way of controls by the Supervisory Authorities. In this regard, it is expressly prohibited to:
 - o Fail to make, with due completeness, accuracy and timeliness, all periodic reports required by applicable laws and regulations;
 - o set forth in the aforesaid communications and transmissions facts that do not correspond to reality, or conceal material facts regarding economic, asset or financial conditions;
 - o Engage in any behavior that is obstructive to the exercise of supervisory functions, including during inspection, by the Administrative Authority (express opposition, pretextual refusals, or even obstructive or uncooperative behavior, such as delays in communications or making documents available);
- e) Prepare, implement, monitor and audit, in Italy and in overseas locations, the procedures necessary for the preparation of the budget and periodic and project reporting, as well as the management of financial resources.

³ With particular reference to the anti-fraud strategies by which the VIS management system is inspired, see:

- Directorate General for Humanitarian Aid and Civil Protection - ECHO, *Anti-Fraud Strategy. Executive Summary*, 2014.
- Transparency International, *Preventing Corruption in Humanitarian Operations. Handbook of Good Practises*, 2014.

Article 19: Behavioral criteria related to checkout management

19.1 VIS personnel who, according to their respective responsibilities, intervene in checkout processing must observe the following prohibitions:

- a) to have business relations with persons (physical or legal) of whom it is known or suspected that they belong to criminal organizations or otherwise operate outside the lawfulness such as, by way of example, persons linked to the environment of money laundering, terrorism, drug trafficking, usury, etc;
- b) Use instruments that are not the subject of internal procedures for carrying out transfer transactions of significant amounts;
- c) Make monetary donations to individuals (individuals or organizations) convicted of engaging in illegal activities, particularly terrorist activities or activities subversive to public order;

19.2 There is an express obligation on the recipients of this Code to:

- a) with reference to the commercial/professional reliability of suppliers and partners, request all necessary information in order to assess their reliability and economic soundness;
- b) make sure that all checkouts have taken place with precise regularity: in particular, it will be necessary to verify, for any transaction, that there is a coincidence between the person in whose name the order, contract, or accounting documents are registered and the person who collects the relevant amounts;
- c) to behave correctly, transparently, in good faith and cooperatively, in compliance with legal regulations and internal procedures, in all activities aimed at the registry management of suppliers, donors, recipients of financial resources;
- d) Pay special attention to checkouts received from credit institutions/customers from abroad;
- e) verify with particular care, including in cases handled directly by VIS offices in partner countries, contractual relationships and any other type of relationship that configures transfers of financial resources with entities that have headquarters, residence or a connection reasonably ascertainable through targeted research (with the Internet and other means of information and data-base) with countries considered as "non-cooperative" by the FATF-FATF (see <http://www.fatf-gafi.org>);
- f) Thoroughly verify, in Italy and in partner countries, the contractual relationships and checkouts underlying the partnership relationships in order to ascertain-reasonably through targeted research (with internet and other media and data-bases)-and exclude that financial resources feed interactions and involvements of partners (especially, but not exclusively, recently known and acquired and/or established) with terrorist and/or criminal activities of various kinds.

This procedure has been translated into English from the original Italian only for the convenience of international readers. In the event of a different interpretation or interpretation dispute, the original Italian procedure shall prevail.



Insieme, per un mondo possibile