

Code of Behaviour

General Principles

1. All employees and collaborators pledge themselves to abide not only by the law, both in Italy and in all other countries where CISP operates, but also by internal regulations, statutory provisions, ethical integrity and propriety which characterize CISP behaviour.
2. The implementation of cooperation projects and the overall CISP activities must be conducted within a framework of transparency, honesty, fairness, good faith and in full compliance with the rules for the safeguard and protection of human life in all its forms.
3. The CISP is based on protecting and promoting human rights and it works in support of the founding of societies based on the principles of equality, solidarity and on the repudiation of war.
4. The CISP recognizes the centrality of civil and political rights, as well as that of the social, economic and cultural ones and of the third-generation rights (self-determination, peace, development and the protection of the environment).
5. The CISP repudiates all forms of discrimination, corruption, hard or child labour, as well as all forms of exploitation of children, starting from the sexual and trade exploitation, taking into particular account the recognition and preservation of human dignity, freedom and equality of all human beings. In the course of its action, the CISP operates in compliance with the universal right to humanitarian assistance, with no restrictions related to the ideology, religion, race, sex.
6. In this regard, CISP operates in the framework of the Universal Declaration of Human Rights of the United Nations, complying, when in humanitarian operations designed to overcome complex emergencies, by the Code of Conduct developed by the International Committee of the Red Cross.
7. All employees and any person employed under the CISP, without distinction or exception, in performing their duties and responsibility, conform their actions and behaviour to the principles and contents of the Code.

B.3 Prohibited Behaviour

B.3.1 Bribery and extortion

1. In all countries the bribing of public officials is forbidden and in many, the bribery of officials from other countries is also prohibited.
2. All employees and people employed in any capacity by CISP are prohibited from offering money or any other unlawful means to achieve an advantages or preferential treatment in tenders, projects and any procedures including those necessary to the obtaining of funding from public bodies, foreign states or international organizations.
3. Any non-verifiable payments are forbidden in all activities carried out by the CISP in partnership with governments, international bodies as well as with the private sector.
4. The CISP prohibits its employees from offering money, gifts or compensations that could reasonably be construed as exceeding the normal practice of courtesy, from exerting illegal pressure, promising any kind of articles, services and favours to public officials in charge of public offices, senior officials or employees of government agencies or concessionaires of utilities or to their relatives, dependants or partners, both Italian and from other countries.

5. The CISP provides a system of internal controls to ensure that all financial transactions are recorded as appropriate, in a clear and truthful way.

6. CISP does not forbid legitimate reimbursements of expenses incurred by its employees and collaborators and directly linked to the performance of their duties and activities, such as travel and lodging expenses.

B.3.2 Fraud and embezzlement

1. The Italian law has specific rules aimed at protecting the disbursement of public funds, contributions, grants from the state, other public bodies and the European Union, in order to prevent embezzlement through the use or the presentation of fake documents or documents certifying the false or through the omission of proper information.

2. The CISP condemns any fraudulent behaviour by prohibiting the production of false documents showing the existence of basic conditions for an invitation to tender and, in general, prohibiting any conduct designed to misrepresent situations that, when distorted, can be used in order to obtain benefits, payments, grants and awards.

3. The CISP does not allow allocating (money) amounts (received) from public, national or European Union bodies, by way of subsidies, grants, contributions or funds for purposes other than those for which they were originally assigned for.

B.3.3 Terrorism and subversion related crimes

1. The CISP expressly condemns all acts of violence with the purpose of subversion and terrorism and it is strongly committed to preventing in any possible way that funds, managed and used by the CISP in the implementation of its projects, as well as the goods or materials it donates to groups and communities could somehow be used to carry out terrorism related offenses.

2. The CISP implements mechanisms for the monitoring and verification of both the public and private partners it cooperates with in the implementation of projects and the allocation of funds, in order to avert any involvements with organizations and associations suspected of any act violating the principles and the values adopted by CISP.

3. Any CISP employee or collaborator who has news (is beware) of acts or behaviour that would constitute a terrorist activity of any kind, including the support to and the funding of such activities or those aiming at subverting democracies, must give immediate notice to their direct supervisor.

B.3.4 Prevention of crimes against the person

1. The CISP in the course of its activities is committed first and foremost to the protection and preservation of human life.

2. The CISP censures any form of right of ownership upon a human being and condemns the reduction or maintenance of human beings in slavery or servitude and forcing upon them any activity meant to their exploitation such as performing labour or sexual services or begging etc.

3. In order to prevent that CISP employees, partners and the members of the its statutory bodies incur crimes related to the reduction or maintenance in slavery and trafficking in human beings and slave trade, the CISP forbids them to exercise any kind of power that could lead to reducing or keeping people in a state of submission forcing upon them to perform labour or sexual services or begging or any other service which involves exploitation.

4. The CISP condemns all forms of sexual exploitation of minors as well as any behaviour directed to even indirectly encouraging child pornography, and it is strongly committed to ensuring that its employees, partners and the members of its statutory bodies do not run into such crimes.

5. The CISP is committed to prevent its employees, partners and the members of its statutory bodies, from the criminal practice of female genitalia mutilation and from thus harming CISP sterling reputation for combating any such practices.

6. The CISP staff is strictly forbidden to even occasionally use the NGO's offices, meeting rooms and facilities, particularly the medical ones, in projects aimed at allowing or at facilitating such practices.

B.3.5 Receiving of stolen goods, money laundering and counterfeiting

1. The CISP abides by all laws against money laundering and in favour of the tracking and proper documentation of any transaction in cash; CISP is also committed to collect sufficient information and documentation on prospective donors or partners, to ensure they engage only in legitimate activities and that their funds come from legal resources.

2. The CISP opposes any form of activity conducive to the crime of counterfeiting. It is therefore forbidden the falsification and / or circulation (by buying and / or selling) of notes, coins, credit cards and other valuables.

B.3.6 Conflict of interests

1. A conflict of interest is any circumstance that would cast doubt on an employee's ability to act with total objectivity with regard to CISP's interests. CISP seeks to avoid the appearance of, as well as any actual, conflict of interest. Employees in doubt about a potential conflict should speak with the appropriate member of his/her supervisory chain. The following are examples of conflicts of interest:

- No employee or family member may have, directly or indirectly, a significant financial interest in, involvement with, or obligation to any business organization which does or seeks to do business with CISP unless the interest or obligation has been fully disclosed in writing to the employee's supervisor and next level supervisor, and it has been determined that the employee's duties for CISP will not require him or her to make decisions or take actions that could be influenced by such interest, involvement or obligation.
- No employee may engage in an independent business venture or perform work or services for another organization to the extent that the activity prevents the employee from devoting the time and effort to the business of CISP as required by his or her position.
- No employee may appropriate or divert a business opportunity of CISP to any other person or organization.
- No employee may participate in a decision-making process involving circumstances that present a conflict of interest. This includes employment-related decisions regarding a family member or other person with whom the employee has a close personal relationship.

B.5 Protection of working conditions

B.5.1 Non-discrimination, equal opportunities, harassment and abuse

1. The CISP provides equal employment opportunities; it is committed to the development of employment procedures and practices that do not discriminate on the racial group, nationality, religion, political opinions, gender, sexual orientation, age, marital status, responsibilities for dependants, participation in unions, prior or present physical or mental disability. This policy applies to all areas of recruitment, selection for promotion and training, as well as remuneration, job assignment and severance areas.

2. In this regard, CISP is committed to adhering to the following basic rules of conduct:

- It is expected that all workers are treated with due respect and dignity.
- Any grievances relating to discrimination or harassment must be reported immediately to the direct Supervisor or to the CISP Director;
- All decisions on workers must be fairly taken and based on facts, free from any bias and discriminatory intent;
- Recruitment and selection procedures must seek to assess effectiveness of personnel based on objective comparison.

B.5.2 Health and Safety

1. The CISP is committed to providing a safe working environment free from risks and dangers. The health and safety of employees and associates are held in high regard and is not allowed to compromise them for any reason.

2. In this regard, CISP is committed to adhering to the following basic rules of behaviour:

- All appropriate precautions must be implemented in order to prevent risks, inconveniences or unfavourable working conditions for CISP staff;
- All accidents or unsafe conditions must be reported;
- All staff must be duly informed of the emergency procedures that relate to their work environment;
- Any acts or threats of violence towards CISP workers must be immediately reported;
- National rules and all standards relating to the health and safety of the personnel must be observed;
- All CISP operations must be carried out in a way to grant full protection to the health of the staff and in order to reduce the risk of injury to employees and the loss of assets;
- Staff must be prepared to address possible emergencies in a prompt and efficient way.

B.6 Privacy

1. The CISP is committed to protecting the information relating to its employees and collaborators, and those of third parties acquired in the course of its dealings, and it is also committed to preventing any misuse or not allowed.

2. The CISP aims at ensuring that the processing of personal data follows criteria of respect for human rights policy and in preservation of the fundamental freedoms and dignity of those concerned, as provided by law.

3. The processing of personal data must be conducted in a lawful and fair way, however, all information are collected and recorded only for specific, explicit and legitimate purposes. Data retention is limited to the time necessary for the purposes of their collection. The CISP also

undertakes appropriate preventive security measures for all personnel databases in order to avoid any risk of data loss and destruction or unauthorized access or treatment not allowed.

4. The employees and staff, involved in processing sensitive information, must comply with the regulations on protection of personal data, including:

- acquire and process only the appropriate data necessary to the purposes directly related to the recruitment process;
- acquire and process the data only by abiding by specific procedures and keep data records protected in order to prevent their access by unauthorized staff;
- collect and record the data orderly so as all authorized personnel may identify and assess them in the most accurate, comprehensive and clear way.

B.7 Final Dispositions

1. All CISP employees and collaborators are required to have detailed knowledge of the values and principles set out in the Code and must abide by them.

2. All employees and collaborators in Italy and abroad must be informed of the adoption of the Code and must commit to adhering and observing the principles of integrity, honesty, fairness and transparency pursued by CISP in the implementation of its projects.

I _____, the employee, acknowledge and commit myself to CISP Code of Behaviour.

Date: _____

Sign. _____
The employee

Date: _____

Sign. _____
CISP Somalia Country Representative