CODE OF ETHICS AND CONDUCT

pursuant to Legislative Decree no. 231/2001

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1. **Introduction**

Credibility and reputation are invaluable assets for all organizations and in particular a non-governmental organization that promotes human rights, the right to health, and operates in diverse economic, political, social and cultural contexts.

It is therefore essential to clearly communicate common values, principles and responsibilities that guide our behaviour in interactions with our donors and funding institutions, communities we work with, project partners, our staff, beneficiaries, including any interlocutor who has a legitimate interest in our activities.

The Code of Ethics is an official document that highlights the Organization’s mission, vision, principles and behavioural rules for all those who work or maintain relationships with Comitato Collaborazione Medica (hereinafter CCM).

The purpose of this code is to highlight and disseminate statutory values, principles and behavioural rules which CCM intends to observe in the exercise of its activities in Italy and abroad, and to define the minimum standards of individual and Organizational behaviour to be observed in its operations.

This document was inspired by the principles contained in CCM's statute, its mission and vision, the codes of conduct to which CCM has adhered to and the charter of commitments to Accountability, adopted by the NGO network “Link 2007 Cooperation”, of which CCM is a member.

This Code is binding and must be observed by all CCM staff, any person who carries out activities in the name and on behalf of the Organization, including those who perform functions of representation, administration or management, as well as partners, volunteers and external consultants who act on behalf of or in the interests of CCM and third parties with whom the Organization collaborates with.

This document is to be considered, alongside the Organization management and control framework of the NGO, as well as a tool aimed at preventing illegal actions as per Legislative Decree 231/01.

2. **Our origins and history**

In 1968 a group of young doctors and medical students from Turin, Italy, decided to take action so that the right to health is guaranteed to everyone: Comitato Collaborazione Medica - CCM was born.

We have been working in countries with limited resources and in Italy for 50 years. We support and strengthen national health systems, above all developing the ability to support the capacities of local health workers. We support and train health and community workers so that they are equipped to adequately offer assistance in situations of greater poverty and hardship.

We use approaches and technologies appropriate to diverse settings and collaborate with local institutions and communities to foster a participatory and lasting change.

We consider health as according to a holistic approach encompassing the general well-being of the individual and the community; for this reason we promote collaborations and synergies with entities...
in the non-profit sector, public institutions, universities, companies and foundations, bringing together experiences and skills from different backgrounds.

In collaboration with other institutions and local communities we work to improve the ability to respond to existing health needs and to promote awareness-raising activities on prevention and access to health services. We train local health workers and strengthen existing facilities - hospitals, health centres and dispensaries - to ensure adequate care even in the most remote areas. We place particular emphasis on the most common diseases and on the most vulnerable groups, women and children, to save as many lives as possible. We promote the use of approaches and technologies appropriate to the context, which are financially sustainable over time, while respecting local cultural factors.

In Italy we are committed to breaking down the cultural and information barriers that hinder access to health services to the most vulnerable people, such as migrants and the new poor. Thanks to the knowledge acquired over 50 years of operations in Africa, we train social workers and health professionals to understand and respond to new and emerging health needs; we inform communities on available prevention and treatment health services; we also participate in the direct delivery of health services for people in hardship. We promote dissemination of correct information and integration with activities in schools and in communities. We promote a correct and informed use of new technologies to promote health. We prepare health workers for missions in low-income countries.

3. Vision and mission

Vision

We believe that every human being, even the most vulnerable and marginalized, must enjoy the right to health understood as the overall well-being of the individual.

Mission

We support development actions that protect and promote the right to health, with a holistic approach, responding to health needs and acting on socio-economic factors, identifying poverty as the main cause of lack of health.

We address our actions to the poorest populations and we work in the most disadvantaged areas of the world through the collaboration among people and communities in Italy and in low-income countries.

We work through:

a) international cooperation projects in the field of integrated health and social care;
b) sensitization programs to be responsible world citizens;
c) training of health workers;
c) activities that promote fair and equitable policies;
d) interventions that protect the health of the most vulnerable population groups.
4. Values and principles

CCM endorses the Universal Declaration of Human Rights (UN 1948), from which it draws the principles for its own interventions.

CCM also adheres to the Ethics Charter of the Italian NGO Association (Associazione ONG Italiane - AOI) and the Code of Conduct of the Red Cross and Red Crescent Movement.

In particular, the principles that inspire CCM’s interventions in achieving its mission are the following:

1. Respect for the dignity of every human being
2. Secularism, pluralism and hospitality of others, in a perspective of peace that is not only the absence of war but a state of harmony with oneself, mankind and the environment
3. Participation and local engagement
4. Honesty and transparency
5. Solidarity as an act of justice because everyone has the right to accessible health services
6. Seriousness
7. Volunteering and professionalism
8. Testimony to give voice to those who have no voice
9. Use of appropriate technologies
10. Skills development of local professionals
11. Impartiality, neutrality and independence
12. Accountability

5. Rules of conduct

Compliance with the law, internal procedures, regulations, self-regulatory codes, ethical integrity and fairness are a constant commitment and duty of all CCM staff and must characterize the behaviour of the entire Organization.

The implementation of projects and work activities of each person must be carried out within a framework of transparency, honesty, fairness, good faith and in full compliance with the laws of the host nation and with the rules set to protect the Organization.

Performing professional duties for CCM can in no way justify, even in part, the adoption or acceptance of dishonest conduct, or in any case contrary to the principles and contents of the Code of Ethics.
The relationships between CCM staff at all levels must be based on criteria and behaviours of collaboration, loyalty and mutual respect.

The following rules of conduct, inspired by the above values and principles, apply to:

- Relations with all individuals and entities with whom it works (members, employees, collaborators, volunteers, statutory bodies, donors and funding institutions, partners, beneficiaries, etc.);
- Asset management;
- The administrative structure of CCM.

### 5.1. Members

In the interactions with its members, CCM:

- manages the membership process according to the applicable regulations, without any discrimination and with transparent procedures;
- provides adequate support and training opportunities for the collaborative activities in which the member participates;
- communicates in a transparent way the mission, programs and objectives of the Organization.
- guarantees participation in the Organization’s activities according to the statutory and regulatory provisions, within the limits of the available resources.

### 5.2. Relations with employees, consultants, volunteers, statutory bodies

In relations with its employees, consultants, volunteers and statutory bodies, CCM:

- respects international labour standards and fundamental rights of the worker, including: freedom of association, right of organization, collective bargaining, equal opportunities and treatment, as well as other standards promoted and pursued by the International Labour Organization (ILO);
- complies with the current norms on labour legislation regarding personnel employed in the various countries with particular attention to the health and safety of its employees;
- selects consultants who share the spirit and mission of the Organization and who possess the requirements, professionalism and characteristics appropriate to their role, without any discrimination and with transparent procedures;
- provides adequate support and training, based on the role requirements;
- communicates in a transparent way the mission, programs and objectives of the Organization;
- promotes the participation and involvement of employees, consultants and volunteers in the management of the Organization and its programs, recognizing their fundamental role for the development of its programs;
pursues continuity - compatibly with its programs and funding of projects - of ongoing collaboration relationships, in the recognition of the motivation, sense of belonging and professionalism of its employees, consultants and volunteers;

recognizes – in a framework of enhancement of human resources and available resources, - the commitment and professionalism of its employees through performance assessment and identifying professional growth paths, without any discrimination. It also recognizes, in compliance with the collective agreements and internal regulations, economic compensation commensurate with the levels of responsibility and professionalism in the various roles in the Organization;

promotes opportunities for discussion and dialogue, open to all members of the Organization, recognizing this as a constructive and functional tool for the pursuit of a collaborative environment and for the effective and efficient management of the activities carried out by the Organization.

To ensure the achievement of its strategic objectives and mission, and effective management, CCM requires its staff, volunteers, consultants and partners to:

align their actions and behaviours to the principles and contents of the Code within the scope of their own functions and responsibilities, recognising that upholding them is an essential part of the quality of the work performed;

respect all contractual responsibilities as defined by the terms of reference or job description;

allocate working time in the pursuit of the objectives assigned to them;

respect rules, regulations and procedures of the Organization;

respect confidentiality obligations. Staff, volunteers, consultants and partners must observe utmost confidentiality in the performance of their duties for CCM. Furthermore, they must refrain from all deeds and declarations that may damage the reputation or operations of the Organization or its staff, or that may create or encourage a hostile climate. All documents produced as part of the implementation of CCM activities are the intellectual property of CCM and cannot be made public without express authorization. The name "Comitato Collaborazione Medica" must appear in all official documents, in compliance with the regulations provided by CCM Turin Headquarters. The use of CCM's name, stamp and / or logo by the staff for personal use is not allowed. The obligations described apply to private and public relations with all persons outside the Organization (other agencies, media and local authorities) during the employment contract and after its termination, irrespective of its causes;

respect basic rules of hygiene and decorum, such as keeping the workplace clean and tidy and having clothing suited to the tasks, roles assigned and the contexts in which it operates.

CCM also requires abstaining from the following behaviours:

**a) Discrimination.** CCM staff shall in no way engage in discriminatory behaviours based on gender, religion, nationality or ethnic group, language, marital status, age, disability or presence of specific diseases, family conditions, sexual or political orientation, nor have behaviours that can be construed as such.

**b) Conflict of interest.** No staff member can assign jobs, consultancy services, benefits or service contracts to individuals or companies with whom s/he has familial, financial or personal ties. In the
event that one of these situations occurs, the persons concerned will immediately report the situation in writing to their assigned focal point (as indicated in the contract or job description) or to one of the sector coordinators who will address the matter in order to prevent the occurrence of any problems and protect the staff involved. Anyone who becomes aware of a conflict of interest will be under the obligation to report it to the assigned focal point.

c) Corruption and bribery. CCM prohibits: donations, gifts or compensation that can be reasonably interpreted as exceeding normal courtesy practices; exert illegal pressures; promise any object, service, performance or favour to public officials, public service officers, managers, officials or employees of the Public Administration or of public service concessionary agencies or their relatives, both in Italy and abroad. CCM staff is not allowed to ask for money, gifts or favours of any kind in exchange for contracts, benefits or job offers.

d) Fraud and embezzlement. CCM condemns any fraudulent conduct, such as producing false documents attesting to the existence of favourable conditions for the participation in a call for tenders and, in general, any conduct aimed at altering the reality of situations whose existence, in the falsely represented terms, is essential in obtaining benefits, donations, grants, awards and official recognitions.

e) Receiving stolen goods, money laundering and falsification. CCM requires compliance with all laws that prohibit money laundering and that require traceability and documentation of any cash transaction. CCM prohibits any form of activity linked to falsification and counterfeiting crimes.

f) Crimes against individuals

Harassment, exploitation and abuse. No form of harassment, exploitation, abuse or harassment will be tolerated. Harassment includes verbal, physical or written forms. Offers of money, employment, goods or services in exchange for sexual favours, as well as other forms of humiliating, degrading or exploitative conduct, are forbidden. Any type of sexual relationship with persons under the age of 18 or those considered to be minors by the local laws will not be tolerated. Under no circumstance will incorrect knowledge of the age of the partner be considered as acceptable justification.

Child labour. Project Managers and Country Representatives are required to ensure that staff working in CCM projects has reached the minimum age as required by local laws on child labour. However, in cases of collaboration with staff of minimum age as identified by the labour legislation of the country, but who has not yet reached 18 years of age, this authorization will only be in case of urgent project needs, after ensuring that the assigned tasks are not dangerous and are compatible with a professional development path. No employee under the age of 16 will be accepted in countries that have not signed the ILO Convention 138 concerning the minimum working age.

g) Security. Behaviours that lead to or could lead to health or safety risks for CCM staff or third parties must be avoided. Each CCM staff member is responsible for security and must promote it, respecting the procedures of the Organization and following the applicable provisions in the country.

h) Detention and use of weapons. It is forbidden for all CCM personnel to carry weapons or store them at the Organization's facilities. Except for situations of force majeure, it is forbidden to accept armed persons on board CCM vehicles or at its facilities.
i) **Use of drugs and alcohol.** It is prohibited to work under the influence of drugs, alcohol or drugs, except in cases with a specific medical indication. The use, distribution or sale of illegal substances is prohibited for all CCM personnel.

j) **Personal gifts.** CCM recognizes the value of active participation of staff, consultants and volunteers in the execution of CCM activities through his own work and possibly his own personal resources. At the same time the Organization believes that acts of humanitarianism in the areas in which it intervenes (for example, gifts, donations of money) can create unequal and discriminatory relationships and therefore hinder the implementation of CCM’s activities. For these reasons, these initiatives must be agreed in advance with the project manager.

### 5.3. Donors and funding institutions

For the implementation of its activities in Italy and abroad, the Organization makes use of public and private funding. In its relations with its donors, CCM:

- provides truthful information on projects for which funding is requested and is available to provide any additional information as requested by funding institutions / donors to enable them gain a better understanding of a project;

- guarantees the implementation of a project in a manner consistent with stated objectives and contract signed with funding institutions;

- reports on project implementation in a transparent manner, producing progress reports and periodic financial reports, as requested by funding institutions. If specific reports are not required, CCM still adopts its own reporting standards, in line with main institutional donors’ requirements;

- maintains, while recognizing donor contributions, its independence from private or government interests. Therefore, CCM does not accept in receiving funding or in the implementation of projects any changes in objectives that are only instrumental to the interests of funding institutions;

- undertakes to diversify sources of funding through fundraising activities from public and private institutions and individuals to promote its independence and autonomy and ensure the continuity of its activities;

- CCM maintains an active interest towards the source of funds and funding institutions to ensure compliance with the Organization’s statute and this code of ethics.

### 5.4. Partners

CCM selects its partner organizations based on skills and reliability, favouring organizations that adopt methods and objectives consistent with those of the Organization.

CCM promotes and fosters the active involvement of local partners for the implementation of activities and the pursuit of its goals and objectives.
Collaboration with partners (organizations or associations) is conditional on the following criteria:

• They must not express the direct interests of national or international political parties;

• They must base their action on the same ethical principles of the Organization.

Partners must guarantee CCM freedom of action and final decision making with respect to goals and objectives stated in the project.

5.5. Relationships with beneficiaries

All CCM employees, consultants and partners are required to have an irreproachable conduct with project beneficiaries, with a special emphasis on the most vulnerable categories. Furthermore, CCM:

• undertakes to offer - in the context of project objectives - the best possible service, in terms of quality and appropriateness, according to the situation and local management capacities;

• commits to guaranteeing access to services provided by the project to all beneficiaries, without distinction or discrimination of class, gender, age, religion, ideology or culture;

• pursues and promotes agreements that define the respective responsibilities and contributions of local communities during the design, implementation and subsequent management of the project.

5.6. International, national and local institutions

In its institutional relations, CCM:

• promotes, through direct interactions, dialogue with all institutions, recognizing their contribution to the achievement of its mission and for the development of international cooperation based on transparent rules and effective approaches;

• intends to contribute and participate in the elaboration and development of intervention strategies in the field of cooperation, making available its expertise and experience, reserving however autonomy in the final decision-making processes;

• operates by protecting its independence both from institutional and external influences, such as those of economic or political interest groups.

5.7. Suppliers

In the procurement of goods, works or services for cooperation and humanitarian aid initiatives, CCM will prioritize, where the necessary good quality, the compliance with ethical and environmental standards, and tax and social security regulations are guaranteed, suppliers from the countries of intervention.
The choice of suppliers and the purchase of goods, works and services are carried out based on objective assessments in respect of competitiveness, quality, value for money, price, and integrity - principles expressed and regulated in the procedures adopted by the Organization.

5.8. Press and media

The only persons authorized to speak on behalf of the CCM are its President, the head of communications or other authorized persons as per the terms of reference in their employment contract.

The internal staff involved in communication activities and any external agents must produce communications that are truthful, verifiable and respectful of rights and dignity of individuals.

5.9. Monitoring bodies

The relations with bodies that perform control and review activities must be based on principles of timeliness, correctness, transparency and information sharing.

The supervisory bodies must be given utmost cooperation, avoiding any acts of obstruction, concealment and falsification

5.10. Judicial authority

It is forbidden to exert pressures of any type on individuals called to provide statements before the Judicial Authority in order to prevent them from making declarations or to make them provide false declarations.

It is forbidden to help individuals who have committed illegal actions to elude investigations by the judicial authority or to escape its enquiries.

5.11. Assets management and administration of the Organization

5.11.1. Equipment and means of communication

For each position CCM identifies resources and equipment necessary to perform the assigned tasks. CCM personnel must use these resources with due care and diligence. Any loss of CCM assets must be reported promptly to the line manager and, if necessary, also to the Authority of Public Security. No changes can be made to the configuration of CCM computers without prior authorization from the IT systems manager (or whoever has this responsibility in the country offices). Furthermore, to prevent damages caused by external viruses, only software provided by CCM should be used. The use of CCM's telephone, fax and internet connection equipment must be limited to the performance of assigned tasks. Any personal use must not involve additional costs for the Organization and / or damage one's own work or that of others. All material assigned by CCM for the execution of project activities must be returned at the end of the project unless an alternative solution has been agreed to in writing.
The unjustified assignment of material to third parties will be considered as embezzlement.

In case of improper use of its assets, CCM can request compensation from its employees and consultants for any damages incurred.

5.11.2. Use of vehicles

The vehicles supplied by CCM are intended for project purposes and activities and / or, in case of necessity, for safety reasons.

During project activities the CCM vehicle is driven by an assigned driver.

Each project manager (or country representative in-charge of office vehicles) is required to periodically verify that:

- Each vehicle has its own use and maintenance book: the driver will indicate the date, location of the trip (in the logbook), and any maintenance works;
- Each vehicle is periodically checked;
- Every vehicle is insured in the countries of intervention;
- For each vehicle there is a list of people authorized to drive it.

The project leader and country representative can be offered logistical support by the country / project logistician.

Private use of the vehicles is permitted with the written authorization of the country representative on the basis of a risk assessment for the vehicle.

The individual using a vehicle for private purposes (whether local or expatriate) is responsible for fuel costs, has the duty to reimburse the Organization for the cost per kilometre to cover the ordinary and extraordinary maintenance of the vehicle, and s/he assumes the economic responsibility for any damage caused. In addition to the repair cost, the user is also responsible for the cost of hiring a replacement vehicle necessary to address any delays to projects activities.

The administration of the country office makes available on a yearly basis the mileage reimbursement due.

For the detailed regulation of the use of vehicles, please refer to the country office manual on human resources management.

5.11.3. Loans

The Organization can grant an advance on the monthly salary due to the employee or consultant.

However, loans with a longer duration are not granted.
5.11.4. Administrative and management rules

In the performance of its administrative functions, CCM intends to comply with the highest standards of ethical behaviour as well as respecting the law.

CCM pursues its statutory goals in compliance with the laws, its statute and internal regulations, ensuring the proper functioning of the corporate bodies, the safeguarding of membership rights and of the integrity of the Organization’s assets.

CCM is required to prepare transparent and truthful financial statements that correctly and clearly represent the economic, assets and financial situation. In doing so, it is necessary to comply with the rules and regulations commonly observed.

Every operation and transaction must be correctly registered, authorized, verifiable, legitimate, coherent and appropriate, in compliance with the rules and regulations in force.

To guarantee integrity in the implementation of its programmes, CCM will:

a) observe applicable laws and regulations;

b) adopt rigorous procedures and decision-making processes to ensure sound management of assets and financial resources;

c) establish mechanisms to monitor performance of its operations and the governing bodies.

6. Rules for the implementation and dissemination of the code and for cases of its infringement

6.1. Adoption and updating of the code of ethics

The Council is the sole competent governing body that can approve and amend the code of ethics.

6.2. Target audience

The principles of the code apply to all persons working with CCM: members, volunteers, administrators, auditors, management staff, employees, consultants, partners, suppliers, donors and beneficiaries.
6.3. Monitoring systems and disciplinary measures

The monitoring of compliance with the Code of Ethics is entrusted to the Supervisory Board, as defined in the internal organizational model, management and control pursuant to Legislative Decree 231/01, which identifies rules of conduct, procedures and methodologies to adequately address errors, frauds and risk factors that hinder the proper implementation of the Organization's activities.

Any reports on violations of the Code must be submitted to the Supervisory Board which is responsible for verifying its factual basis. The report can be made directly or through trusted persons and must be sent to the address odv@ccm-italia.org. To conduct these checks, the Supervisory Board can make use of the organizational structures in the way it finds most appropriate (for operational details, refer to the whistle blowing procedure).

All members of the Supervisory Board must ensure the confidentiality of the identity of the individual submitting a report in good faith, without prejudice to legal obligations.

Should violations arise CCM reserves the right to:

- apply sanctions to its employees according to the disciplinary system of the CCNL and in the human resources manual;
- resolve the contractual relationship with third parties.

6.4. Promotion and dissemination of the code of ethics

To promote compliance and effectiveness, CCM commits to distribute this document to all its members, employees and consultants and to bring it to the attention of all the external parties with whom it has interactions with. This document will also be published on its website www.ccm-italia.org