Approved:	
President of the	
International Charitab	ole Foundation
"Caritas Ukraine"	
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(date)	

CODE OF ETHICS AND CONDUCT INTERNATIONAL CHARITABLE FOUNDATION "CARITAS UKRAINE"

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1. Mission and identity of Caritas Ukraine

- 1.1. Caritas¹ Ukraine is a national network of charitable organizations founded by the Ukrainian Greek Catholic Church that creates systemic and sustainable solutions that help people overcome crises and live with dignity. Being closely connected to the international network of Caritas Europe and Caritas Internationalis, Caritas Ukraine remains close to people in communities, thus acting with the same professionalism both locally and globally.
- 1.2. The activities of Caritas Ukraine as a network of charitable organizations are the manifestation of the ministry of the Ukrainian Greek Catholic Church, an expression of Christian values in the implementation of charitable activities in favor of people in need, regardless of their national, religious or racial affiliation. Rooted in the Holy Scriptures and the Traditions of the Church, guided by the Social Doctrine of the Church, we serve in love those most in need for the integral development of the individual, community and society (through the spirituality of encounter and the development of a culture of charity).
- 1.3. Caritas always aims to meet a specific person in his or her experiences and needs:
 - we believe that every person is unique, inimitable and valuable;
 - we do not allow any manifestation of disrespect for a person;
 - we respect human rights, cultural characteristics and their importance in human behavior;
 - we respect the dignity of those to whom we provide assistance.
- 1.4. Throughout its activities, Caritas Ukraine draws inspiration from the Holy Scriptures, the tradition and experience of the Church, the Social Teaching of the Catholic Church, the principles and recommendations set forth in the documents of the Roman Apostolic See, the Synod of Bishops and the Head and Father of the UGCC, in particular those related to social issues ².
- 1.5. Caritas Ukraine stands for statehood, supports the integrity and independence of the state, the development of civil society, and is guided by the Constitution of Ukraine and the current legislation of Ukraine. Document flow, communication, official events and presentations are conducted in Ukrainian.
- 1.6. The mission of Caritas Ukraine is to develop the traditions of charitable activities to overcome poverty, inequality and social exclusion by providing charitable and humanitarian assistance, creating an effective system of social, medical and educational services in Ukraine, promoting community development based on Christian moral and ethical values.

2. Purpose of the Code

- 2.1. The Code of Ethics and Conduct (hereinafter referred to as the Code) is a set of ethical and professional requirements based on the identity of Caritas Ukraine and applicable throughout the Caritas Ukraine network in order to
 - care for the dignity, needs and rights of all people, especially people in need (beneficiaries), personnel and affiliates;
 - cultivate the spirituality of encounter and building relationships;
 - establish, define and implement common standards of ethics and conduct at all levels of interaction in the Member Organizations of the Caritas Ukraine Network;
 - improve the quality of professional duties and social services.

² Apostolic Letter Motu Proprio of Pope Benedict XVI "Intima Ecclesiae Natura" (The Inner Nature of the Church) on Charitable Service, Specific Law of the UGCC



¹ The word "Caritas" means both love and mercy, compassion and charity.

2.2. The Code has been developed and approved in accordance with the policies and procedures of Caritas Internationalis, in particular: The Code of Ethics, Putting our Values into Practice: Code of Conduct for Staff of Caritas Internationalis Member Organizations, Code of Conduct for the Protection of Beneficiaries from Violence and Exploitation, and Caritas International Management Standards (CIMS).

3. Definition of terms

The main terms used in this Code are defined in the Glossary (Annex 1), which is an integral part of the Code of Ethics and Conduct.

4. Scope of application

- **4.1.** The Code applies directly to:
 - 1) All personnel of the Member Organizations of the Caritas Ukraine Network (all employees, management, board members, interns, volunteers, students on internship);
 - 2) Affiliates involved in any way in the implementation of programs and activities of the Member Organizations of the Caritas Ukraine Network (partner organizations and their personnel, project donors, consultants, contractors and/or any other third parties, including foreign ones).
 - 3) People in need/Beneficiaries (individuals, groups or organizations that receive charitable assistance, including the corresponding benefit, directly or indirectly, within the framework of projects, programs or activities of the Member Organizations of Caritas Ukraine Network).
- 4.2. The Code applies anywhere and at any time, including working hours and non-working hours (including vacations), at the workplace and outside it, in Ukraine and abroad.
- 4.3. The Member Organizations of the Caritas Ukraine Network shall approve their own codes of ethics and conduct, which shall be consistent with this Code. In the absence of their own code of ethics and conduct, when implementing programs and projects jointly with Caritas Ukraine, the Member Organizations of the Caritas Ukraine Network undertake and guarantee to comply with this Code.

5. Values of Caritas Ukraine

- 5.1. The activities of Caritas Ukraine are focused on people, their dignity, needs and rights. Therefore, in all its activities, projects, and programs, Caritas Ukraine tries to act in the best way possible so as not to lose a person, fostering cooperation and networking.
- 5.2. The activities of the Caritas Ukraine network at all levels and in all directions should be based on the following values, which are attributes of a sustainable productive team:
 - 1) Respect -

In its activities and building interpersonal relationships, Caritas Ukraine is guided primarily by respect for the human person, and thus for religious traditions, culture and customs that focus on strengthening and maintaining the dignity of the human person.

That is why respect for the roles, tasks, personal boundaries of colleagues, partners, values and traditions of the organization, as well as for people in need (beneficiaries), for whose benefit all the activities of the Caritas Ukraine network are addressed, is fostered in daily activities.

2) Integral Human

Caritas Ukraine, guided by its Christian identity, understands the



Development -

human person as integral (spirit-soul-body), which includes spiritual, psychological, emotional, physical, material and economic dimensions, and therefore in its activities seeks to develop the individual and the community, ensuring a strong and comprehensive approach to assistance and development.

True integral human development is a long-term, dynamic process based on human dignity and the development of relationships: each person's relationship with God, himself/herself, other people and all of creation.

Caritas Ukraine promotes the professional and human development of its employees and volunteers, with care for safety and respect for personal boundaries, because it treats personnel as human beings, not functions.

3) Common good -

Caritas Ukraine is guided by the belief that a sense of human dignity and the ability to develop in a community depends on how society is organized in its social, religious, cultural, economic, environmental, legal and political dimensions. Therefore, in the community of the Catholic Church, it works with other religious traditions, governments (at various levels), civil society and all those in authority to protect human dignity, realize individual and social rights and responsibilities, and promote the common good.

Therefore, within the organization, it fosters the common good through:

- realization that the organization's funds and property are not personal property or benefit, but something that can serve people in need,
 - saving the organization's funds,
 - environmental protection.

4) Justice -

Caritas Ukraine develops charitable activities by serving, accompanying and interceding for people in need, helping them to change the circumstances of their lives that contradict the concept of human dignity. It also strives to build a just moral order and relationships with employees, volunteers, partners, and beneficiaries that are consistent with this moral order through:

- transparent procedures and clear rules of interaction in the organization and roles for both partners and recipients of assistance;
- cooperation, transparency of information, impartiality and objective approach to decision-making;
- compliance with the law and approved internal policies and procedures.

5) Compassion -

The Christian identity of Caritas Ukraine defines a moral duty and an active obligation to respond, provide assistance and answer the needs of a person (colleague, beneficiary, partner), following the example of the Good Samaritan.

6) Solidarity -

In its activities, Caritas Ukraine tries to build unity and solidarity



with people in need, which is manifested in the ability to see a person with their unique life experience, to feel their need and to be open to help in difficult circumstances to those who cannot overcome life challenges on their own. In the daily work of Caritas Ukraine, solidarity is not a one-time action, but a long-term commitment - a willingness to accompany, cooperate, jointly seek solutions and create conditions in which everyone feels heard, understood and a full member of society. By practicing solidarity in their daily work, Caritas Ukraine employees respond to God's call to be there for those in need.

The personnel of Caritas Ukraine fosters cohesion in the team, in the community and society, develops productive cooperation at various levels: from small teams in projects to teams in directorates and between them, as well as between the Member Organizations of the Caritas Ukraine Network, offers support and assistance, showing compassion and empathy.

7) Preferential Option for the people who need the most -

Guided by the call of the Holy Scriptures, Caritas Ukraine seeks to fight poverty and those circumstances that deprive people of their dignity and humanity, and to help those who are isolated by society. For this purpose, Caritas Ukraine works to restore the rights and justice of people in need, acting in the best way possible given the circumstances and resources available.

Principles of Caritas Ukraine 6.

The activities of Caritas Ukraine should be aimed at ensuring the integration, autonomy and participation of each person, without allowing any form of discrimination, in accordance with the following principles:

1) Solidarity and subsidiarity

Solidarity and subsidiarity are fundamental principles in the activities of Caritas Ukraine. Solidarity is manifested in the ability to see the circumstances and needs of each beneficiary, and thus to provide appropriate assistance and support. Subsidiarity, in turn, means that any assistance is provided at the level closest to the beneficiary, and only when a person is unable to overcome a difficult situation on their own. Such assistance is aimed at helping a person in need to become self-sufficient, take care of others and contribute to the development of the community in which they live. This approach contributes to building a just and cohesive society and the common good of all mankind.

2) Freedom of religion

Caritas Ukraine is guided by the principle of providing assistance to all people in need, regardless of their religion or belief, based on the identification of needs, social situation and crisis situation. We respect the cultural characteristics and religious beliefs of all people. Caritas personnel and people in need (beneficiaries) must be aware of and respect the Catholic identity of Caritas.

3) Complexity and systematic approach Caritas Ukraine strives to solve the problems of people in need, taking into account the full range of their problems and challenges. By analyzing individual problems, studying their causes and



consequences, Caritas Ukraine seeks to influence changes in the social sphere, contributing to the improvement of the social service delivery system.

4) Professionalism and humanity

Caritas Ukraine highly values the professional qualifications of its employees and supports their continuous professional development by organizing and encouraging participation in trainings, seminars, conferences and internships both in Ukraine and abroad. In their daily work, the management and employees take care of everyone in need, apply an individual approach to different human situations and try to maintain a balance between professionalism and cordiality in their interactions with beneficiaries and colleagues.

5) Partnership and networking

Caritas Ukraine is based on the belief that in order to solve complex social problems, it is necessary to combine the efforts of state and local authorities and civil society organizations, and therefore actively cooperates with them at the national and local levels. Caritas Ukraine also highly values partnership support, exchange of experience and best practices with Caritas Europe and Caritas Internationalis. Caritas Ukraine is committed to building and strengthening the network of local member organizations, supporting their development and initiatives in every way possible, while respecting their legal independence.

6) Environmental responsibility

Recognizing that the Earth and everything on it are entrusted to the Creator, Caritas Ukraine constantly cares about preserving the environment in its activities and is aware of its responsibility to future generations. This is manifested in the implementation of environmentally responsible resource consumption practices, waste minimization and support of eco-initiatives in communities. Caritas Ukraine encourages its employees, beneficiaries and partners to engage in environmental education and active efforts to preserve the environment.

7. Humanitarian principles and standards

7.1. The main humanitarian principle of Caritas Ukraine: "The human being is at the center of every humanitarian action". Humanitarian principles are based on three fundamental human rights, namely: the right to a decent life, the right to receive humanitarian assistance and the right to safety and protection.

7.2. The humanitarian activity of Caritas Ukraine is guided by generally recognized principles:

1) Humanity

Human suffering must be addressed wherever it occurs. The goal of humanitarian action is to protect life, health and ensure respect for human beings.

2) Impartiality

Humanitarian action should be based only on need, with priority given to the most urgent cases of disaster. We equally help all those in need, regardless of gender, religious beliefs, class or political convictions, nationality, race.



3) Independence

Humanitarian action should be autonomous from political, economic, military or other goals that any entity may pursue in relation to the area where humanitarian action is carried out.

4) Neutrality

We do not allocate funds to support military operations.

- 7.3. The humanitarian activities of the Caritas Ukraine Network are carried out in accordance with generally accepted standards:
 - 1. Communities and people affected by the crisis receive assistance that meets their needs.
 - 2. Communities and people affected by the crisis have access to the humanitarian assistance they need and when they need it.
 - 3. Communities and people affected by the crisis are not negatively affected and are better prepared, more resilient and less at risk as a result of humanitarian action.
 - 4. Communities and people affected by the crisis know their rights and have access to information and participate in decisions that affect them.
 - 5. Communities and people affected by the crisis have access to safe and responsive grievance mechanisms.
 - 6. Communities and people affected by the crisis receive coordinated, complementary assistance.
 - 7. Communities and people affected by the crisis can expect to receive improved assistance as organizations learn from experience.
 - 8. Communities and people affected by the crisis receive the assistance they need from competent and well-managed personnel and volunteers.
 - 9. Communities and people affected by the crisis can expect that the organizations assisting them will manage resources effectively and ethically.

8. Rules of ethics and conduct in the Caritas Ukraine Network

All personnel of the Caritas Ukraine Network are expected to be guided at all times by the values and principles defined in Section II of this Code and must adhere to the following:

1. General rules of ethics and conduct

- 1) regardless of personal religious views and beliefs, be aware of the Christian and Catholic identity of Caritas and show respect for it and the lifestyle that follows from it;
- 2) avoid public statements that contradict the morals, values and identity of Caritas Ukraine (in particular, statements in support of abortion, euthanasia, etc.);
- 3) ensure that their personal and professional behavior meets the highest standards at all times and is perceived as such by others;
- 4) act with integrity and treating others with respect, creating an environment that respects the differences between people;
- 5) respect all human rights and freedoms and report discrimination, harassment, abuse, neglect and exploitation that violate the rights of others;
- 6) avoid coercion to participate in religious events, as well as condemnation for non-participation in them;
- 7) refrain from making public or private statements about racism, sexism or other discriminatory topics, as well as any derogatory comments about a person's appearance, clothing, age, gender, marital status or religion;
- 8) comply in good faith with the laws of the state in which they operate;
- 9) respect the state symbols of Ukraine, use the state language in the workplace and in the performance of their official duties, constantly improve their level of proficiency in the state language, and prevent discrimination against the state language;



10) respect and be sensitive to the local traditions, customs and culture of the people and communities being assisted.

2. Labor regulations and discipline

- 1) comply with the internal labor regulations, requirements of the Safeguarding system, labor protection, safety protocols, safety rules, fire safety, and ensure compliance with these rules by subordinates;
- 2) honestly, conscientiously, impartially and timely fulfill orders of the immediate supervisor, as well as duties (functions) defined by job descriptions, without harm and discrimination:
- 3) adhere to work discipline, use all working time for productive and efficient work;
- 4) always remember personal responsibility and not to use your position for personal purposes, comply with the requirements for preventing conflicts of interest, corruption and fraud according to Conflict of Interest Prevention Policy and Anti-corruption and anti-fraud policy;
- 5) maintain confidentiality of all information and data (including personal data of colleagues, partners and beneficiaries) obtained in the course of performing their duties in the Caritas Ukraine Network;
- 6) to take responsibility for all training and development opportunities offered within the Caritas Ukraine Network, including ensuring timely registration, proper attendance/connection, completion and fulfillment of assigned tasks, and provision of all necessary information.

3. Relationships with colleagues

- 1) to maintain and develop effective cooperation, tolerant and correct relations with colleagues based on mutual respect, support and exchange of experience and information at all levels of interaction: between managers and subordinates; between personnel involved in different areas of work; between employees and volunteers; in the teams of the network member organizations and between them;
- 2) to encourage and develop solidarity and cooperation within the organization and with the personnel of other Member Organizations of the Caritas Ukraine Network and partners;
- 3) to treat colleagues with care and respect, to promote a psychologically favorable microclimate in the team:
- 4) to communicate both orally and in writing in Ukrainian with respect, in a polite, tolerant and friendly manner, regardless of position; raising the tone and using obscene language is prohibited;
- 5) not to spread rumors/gossip, avoid discussing the personal or family life of colleagues, their family members and other close people without the consent of the colleagues in question;
- 6) to maintain the confidentiality of information related to the consideration of sensitive appeals;
- 7) to respect the working time of colleagues and refrain from actions that may prevent colleagues from performing their work duties;
- 8) to respect the rest time of colleagues and refrain from actions that create an additional workload;
- 9) to observe subordination in all relationships between managers and subordinates;
- 10) to resolve any conflicts in the work environment in a peaceful and constructive manner, without the use of insults, humiliation or physical, emotional or other violence (the use of mediation procedures to resolve conflicts is encouraged);
- 11) to apply ethical practices in recruiting employees (avoid enticement of employees from



other structural units or Member Organizations of the Caritas Network);

12) to record telephone conversations, meetings, interviews and work-related conversations only with the consent of all participants.

4. Relationships with people in need (beneficiaries)

- 1) to provide an atmosphere of hospitality for all people in need who apply or come to Caritas, to encourage beneficiaries to interact based on trust, compassion and confidentiality;
- 2) to treat all people in need with dignity and respect without discrimination based on language, religion, ability, age, gender, nationality, place of residence, political beliefs, socio-economic status, etc.;
- 3) to treat with understanding and tolerance various emotional manifestations of people in need, without aggression towards other opinions, lifestyles, behaviors, feelings, ideas and in all circumstances to maintain balance and tolerance, showing mercy;
- 4) to create and maintain a safe environment that prevents abuse, discrimination, violence, exploitation and any other violations of the Safeguarding System against beneficiaries, especially children and vulnerable adults;
- 5) to focus on the needs and interests of people in need in all activities that concern them, to enable each beneficiary to use and expand their capabilities to overcome the difficult life circumstances in which they find themselves;
- 6) in all cases where it is provided for by law, obtain written consent from beneficiaries and legal representatives, including parents, guardians and caregivers of children/vulnerable adults:
- 7) to observe professional boundaries in all communications with beneficiaries;
- 8) to ensure accessibility and barrier-free assistance and services provided to beneficiaries (including without any restrictions for believers of other faiths or religions or non-believers);
- 9) to provide complete, accurate and timely information on the rights and obligations of beneficiaries, assistance and services provided to them;
- 10) to ensure the confidentiality and protection of all information about beneficiaries in accordance with the <u>Policy on Confidentiality and Protection of Personal Data of Beneficiaries</u>.
- 11) to communicate with all beneficiaries in Ukrainian, providing the possibility of switching to another language or translation at the request of the beneficiary;
- 12) to respect the right and desire of beneficiaries to suspend the receipt of assistance or services, as well as to engage other professionals/organizations.

5. Relationships with Affiliates

- 1) to adhere to respect, ethics and subordination in all communications with affiliates;
- 2) to develop partnerships on the basis of good faith and mutual responsibility;
- 3) to maintain stable relations with government and local authorities based on the principles of legality, professionalism, mutual trust, respect and unalterability of commitment;
- 4) to adhere to internal policies on all external communications, including the obligation to coordinate Caritas' position with management.

6. Protecting the property of Caritas Ukraine and exercising control

- 1) always make sure that the assets and intellectual property of Caritas Ukraine, as well as of the Member Organizations of the Caritas Ukraine Network, are not at risk of abuse or destruction and are protected from theft, fraud or other damage;
- 2) keep your workplace clean and tidy, and keep other common areas (corridors, kitchens,



bathrooms and other premises) in a clean condition;

- 3) to smoke outside the premises of Caritas Ukraine and the workplace;
- 4) to use computer and other equipment, vehicles and any other property efficiently, carefully, for the intended purpose and in accordance with the organization's internal documents and technical instructions (if any);
- 5) to save and rationally use materials, electricity and other material resources;
- 6) to adhere to the principles of moderation and expediency when planning business trips and events, including the choice of place of residence/event, determination of logistics and mode of transportation, etc.;
- 7) to ensure reliable protection of access to its corporate mail and internal information systems (logins, passwords);
- 8) to plan and spend the entrusted funds exclusively for their intended purpose, comply with all internal policies, regulations and procedures;
- 9) to adhere to the standards of transparency, full disclosure and integrity in the preparation of financial statements;
- 10) to refrain from entering into any agreements, memorandums and other transactions that may involve abuse and/or any threat to the property of Caritas Ukraine and its member organizations.

7) Reputation, public statements and political activity

- 1) to contribute to the creation of a positive image and reinforce the reputation of Caritas through their actions and behavior during and after working hours, when working with beneficiaries and when interacting with other organizations, public authorities and governments, always protecting it from any humiliation or violation;
- 2) to express their opinions and positions only as individuals and citizens, without emphasizing their affiliation with a Member Organization of the Caritas Ukraine Network and without using its resources for this purpose;
- 3) to avoid public statements that contradict the morals, values and Catholic identity of Caritas Ukraine (in particular, statements in support of abortion, euthanasia, etc.).
- 4) to provide any comments or statements on behalf of the Member Organizations of the Caritas Ukraine Network only after approval by the management and persons responsible for external communications;
- 5) public statements, other actions or inactions that may adversely affect the image of Caritas Ukraine and the credibility of the Member Organizations of the Network, or pose a threat to the constitutional order, territorial integrity and national security, health and rights and freedoms of other people are not allowed;
- 6) to refrain from participating in political campaigns and actions, as well as campaigning for other employees in favor of any political parties or candidates while performing official duties, during working hours and in branded clothing of Caritas;
- 7) to notify in writing the immediate supervisor of his/her participation in political activities, in particular in case of registration as a candidate for deputy by the Central Election Commission or other election commissions formed (established) in accordance with the prescribed procedure (within one day from the date of registration);
- 8) not to use the organization's funds and resources, including working time, telephone lines, e-mail, etc. for personal participation in political events and their support.

8. Personal behavior

1) it is prohibited to bring narcotic or toxic substances, cold steel and firearms with you while performing your duties, including in the office/vehicles/during business trips, etc. (except for persons who have an official permit to carry weapons in accordance with the



law);

2) to refrain from excessive alcohol consumption;

- 3) it is prohibited to use narcotic substances, toxic or psychotropic drugs, participate in gambling on the premises of the Member Organizations of the Caritas Ukraine Network, in vehicles belonging to them, on business trips, as well as during any events;
- 4) to adhere to the recommended style of appearance, taking care of cleanliness, neatness and compliance with the generally accepted requirements of decency in the workplace, at events, on business trips, etc.;
- 5) to respect and take care of clothes and things that contain the logo of Caritas Ukraine and partner organizations, use such clothes and things in the performance of official duties;
- 6) to be responsible for personal public statements, including when using social networks, without promoting discrimination, violence, bad habits (alcohol, drug, gambling, etc.), and views that contradict the morals, values and identity of Caritas Ukraine.

9. Safeguarding system requirements

- 9.1. All personnel and affiliates must familiarize themselves with the policies and procedures of the Safeguarding System and strictly comply with their provisions:
 - 1. Safeguarding policy;
 - 2. Policies and procedures for the protection of children and vulnerable adults;
 - 3. Anti-human-trafficking Policy;
 - 4. Conflict of interest prevention policy;
 - 5. Anti-corruption and anti-fraud policy;
 - 6. Procedure for handling sensitive appeals and providing feedback;
 - 7. Other policies and procedures, both current and those that may be developed, shall be approved as necessary.
- 9.2. The Personnel and Affiliates are expected to comply with the requirements of the Safeguarding System (the List of Safeguarding System Requirements is provided in Annex 2 to the Code), which includes, in particular, but not exclusively, the following rules:
 - 1) violence and exploitation as acts of immoral and improper behavior are grounds for disciplinary action up to termination of cooperation or dismissal, with simultaneous notification of the relevant law enforcement agencies of the commission of illegal acts;
 - 2) it is prohibited to hire, offer money, goods and services in exchange for any sexual activities or actions that may be considered as exploitation of a person and humiliation of his/her dignity;
 - 3) personnel and affiliates are prohibited from having any sexual relationship with children (under 18 years of age), regardless of local traditions, laws regarding the age of majority, or the age of the employee, partner or volunteer. Assuming that a person is of legal age does not justify inappropriate and illegal behavior;
 - 4) personnel and affiliates must not engage in any form of harassment, discrimination, physical or verbal humiliation, intimidation, favoritism or exploitative relationships;
 - 5) personnel and affiliated persons are expected to behave in accordance with the values of Caritas Ukraine, create and maintain an environment that prevents violence and exploitation.

9.3. Obligation to report violations

Personnel and affiliates are obliged to report any suspicions and/or facts of violation of the Safeguarding system within 24 hours from the moment they learned or should have learned about such abuse through the established feedback channels:

√by e-mail: feedback@caritas.ua;



- ✓ via the online form on the Caritas Ukraine website;
- ✓ by calling the Caritas Ukraine hotline;
- ✓ personally to the Person Responsible for the implementation of the Safeguarding system.

9.4. Disclosure of conflicts of interest

In accordance with the Conflict of Interest Prevention Policy, personnel who have a potential/actual conflict of interest are required to declare it in writing to their immediate supervisor and to an employee whose duties may be affected by it, and to refrain from taking actions and making decisions related to the conflict of interest until the relevant decision is made by the management. A notification about the conflict of interest must be submitted no later than the end of the next business day after the moment when the conflict of interest was known or should have been known.

10. Familiarization, adoption and compliance with the Code

- 10.1. Before starting work, personnel undergo an adaptation period, which includes mandatory familiarization with the policies and procedures of the Safeguarding System, as evidenced by official statements and signatures, and Safeguarding training. Subsequently, all personnel must undergo repeated Safeguarding training on an annual basis.
- 10.2. Provisions on the obligation to comply with the Code are an integral part of employment agreements and contracts, civil service agreements and volunteer agreements.

11. Violation of the Code

11.1. Any behavior that creates a threatening, hostile or humiliating environment for personnel is considered a violation of this Code and is grounds for disciplinary action. Any violation of this Code is considered a violation of the Safeguarding System.

11.2. Reporting a violation

Personnel and affiliated persons are obliged to report about any suspicions and/or facts of violation of the provisions of this Code within 24 hours from the moment they learned or should have learned about such abuses through the established feedback channels specified in clause 9.3 of this Code. Reports of violations of the Code of Ethics and Conduct will be considered in accordance with the Procedure for handling sensitive appeals and providing feedback in the Caritas Ukraine network.

12. Responsibility

- 12.1. All persons working in the Member Organizations of the Caritas Ukraine Network, especially managers, are responsible for compliance with the provisions of this Code.
- 12.2. In case of violations of the requirements of this Code, the personnel shall be liable in accordance with the Charter, policies and procedures of the Safeguarding System, internal documents of Caritas Ukraine and the norms of the current legislation of Ukraine. Proven deliberate and intentional violation of the provisions of this Code by the personnel shall be grounds for disciplinary liability as provided for by the Labor Code of Ukraine and the Internal Labor Regulations of Caritas Ukraine.

13. Final provisions

13.1. This Code is an updated version of the Code of Ethics of Caritas Ukraine, approved on 03.02.2020; Implementation of our values: Code of Conduct for the personnel of the Caritas Ukraine, approved on 03.02.2020; Code of Conduct for the protection of beneficiaries from



- violence and exploitation, approved on 03.02.2020.
- 13.2. This Code shall be reviewed and updated at least once every two years. All amendments and additions to this Code shall be made by setting it out in a new version. Upon approval of the new version of the Code, the previous one shall cease to be valid.
- 13.3. Upon approval, this Code shall be made available for review by all persons who are members of the personnel as of the date of approval. In order to promote familiarization and awareness of all interested parties, the Code is placed in open public access on the website of Caritas Ukraine.
- 13.4. This Code is inextricably linked to other policies of Caritas Ukraine, in particular the policies and procedures of the Caritas Ukraine Safeguarding System.
- 13.5. This Code shall enter into force on the first day of the month following the month in which it was approved.

Glossary

Gambling

any game, the condition of participation in which is the placement of a bet by a player that gives the right to receive a win (prize), the probability of receiving and the amount of which depends in whole or in part on chance, as well as the knowledge and skill of the player.

Beneficiaries

individuals, groups or organizations that receive charitable assistance as part of the implementation of programs, projects or activities of the Member Organizations of the Caritas Ukraine Network.

Property (assets) of Caritas Ukraine

- assets include: property, cash, information, intellectual property, including licenses, patents, software, equipment (e.g., telephones and computers).
- intangible assets created or developed by employees as part of their functional duties are the property of the organization to the extent that they do not contradict applicable law or contracts.

Vulnerable adults

persons over 18 years of age who, due to age, gender, disability, functional impairment, illness, poverty, their circumstances, or as a result of social and other inequalities, displacement or crisis, are or may be unable to take care of themselves or protect themselves from abuse or exploitation.

Discrimination

situation in which a person and/or a group of persons on the basis of their race, skin color, political, religious and other beliefs, gender, age, disability, ethnic and social origin, citizenship, marital and property status, place of residence, language or other characteristics that were are and may be real or assumed, shall be restricted in the recognition, exercise or enjoyment of rights and freedoms in any form established by law, unless such restriction has a legitimate, objectively justified purpose, the means of achieving which are appropriate and necessary.

Child

for the purposes of this Code, is any person under the age of 18.

Decency

the obligation to perform their duties to the best of their ability, honestly and impartially, regardless of personal ideological, religious or other views, not to provide any preferences or show favoritism to some individuals or legal entities, public, political or religious organizations, and not to avoid decision-making and responsibility for their actions (inaction) and decisions.

Protection

responsibility and taking measures to prevent and respond to abuse, harassment, discrimination and exploitation.



Confidential information

information, access to which is restricted to an individual or legal entity, except for public authorities, as well as information recognized as such by law. Confidential information may be disseminated at the request (consent) of the relevant person in the manner determined by him/her in accordance with the conditions stipulated by him/her, unless otherwise provided by law.

Confidentiality

special regime of access to and processing of confidential information, which provides for a limited number of persons entitled to access the information, as well as special rules for processing, storing, transferring and destroying confidential information designed to protect confidential information from being transferred to third parties without consent, except when such transfer is required by law.

Conflict of interest

conflict between the personal interests of a person and his/her official powers, which may affect the objectivity or impartiality of decision-making, as well as the performance or non-performance of actions in the exercise of his/her official powers.

PRISS

Person Responsible for the Implementation of the Safeguarding system.

The basic humanitarian standard of quality and responsibility (CHS)

The CHS is a voluntary code of conduct that describes the essential elements of principled, accountable and quality humanitarian action. The CHS, together with the recommendations contained in the Sphere Handbook, are internationally recognized standards for humanitarian interventions that ensure quality and accountability.

Gossips

rumors, news about someone or something that are not supported by actual facts; talk.

Beneficiary's needs

necessary conditions for maintaining the vital activity of the human body, social group and society as a whole.

Professional ethics

code of rules that defines the behavior of a specialist in an official setting, norms that comply with existing laws and departmental regulations, professional knowledge, team relations, and a deep awareness of moral responsibility for the performance of professional duties.

Professional boundaries of social work

the limits of the social worker's competence and the professional distance between the specialist and the beneficiary.

Racism

in general terms, it consists of actions, words or behavior that elevate or demean people because of their skin color, culture or ethnicity.

Recommended style of appearance

clothing and accessories that allow you to look authoritative, confident, solid, emphasize your professional status and inspire and strengthen the trust of colleagues and partners.



Sexism

any behavior (in the form of an action, word, image, or gesture) that is based on the belief that some people, mostly women, are inferior because of their gender.

Social services

measures aimed at social groups, families or individuals in difficult life circumstances who need outside help to improve or restore their life activities and return to normal functioning and maintain their health.

Safeguarding

the responsibility of all Member Organizations of the Caritas Ukraine Network to ensure that their personnel, programs and activities respect the dignity and rights of all people, and do not harm or put at risk of abuse either children or adults.

Rumors

message originating from one or more persons about an unconfirmed event.



List of Safeguarding System Requirements (extract from the Safeguarding policies)

1. Protection from abuse, exploitation, harassment, discrimination and bullving

at all times with dignity and respect without discrimination 3) Listen to the views and opinions of children and vulnerable adults and encourage and ensure their participation in decisions that affect them 4) Establish mutual respect and open dialogue with children and vulnerable adults, their families, and colleagues, and avoid raising your	1. Protection from abuse, exploitation, harassment, discrimination and bullying			
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				adult, exploitation and trafficking in human beings, etc.
5) Allow the child and vulnerable adult to perform 3) Cause physical or emotional harm to children and	(5)			
tasks that they can do independently, if it is not vulnerable adults.				
against the law and does not pose a threat to 4) Use money, goods or services for the purpose of		against the law and does not pose a threat to	4)	
them. committing sexual acts, including sexual services.				committing sexual acts, including sexual services.

- 6) Obtain the consent of the relevant persons (parents, guardians, etc.) for all actions concerning children and vulnerable adults.
- Maintain a safe and appropriate distance, avoid physical contact that, despite good intentions, may be misinterpreted.
- 8) Ensure the confidentiality of all information about children, vulnerable adults and their families, unless disclosure is critically necessary for their protection, the consent of the relevant persons (parents, guardians, etc.) has been given, or such disclosure is required by law or competent public authorities.
- 5) All forms of humiliation, disrespect or exploitation of children and vulnerable adults.
- 6) The use of any form of physical (corporal) punishment, inappropriate language, psychological manipulation, sexual exploitation or any other form of violence against children.
- 7) Engaging in any form of intimidation, discrimination, physical or verbal abuse, humiliation, prejudice or sexual relations with children and vulnerable adults.
- 8) Abuse their authority and/or position to adversely affect the lives or welfare of children and vulnerable adults.
- 9) Demand any services or actions from children and vulnerable adults for personal or organizational benefit in exchange for protection or assistance.
- 10) Support and participate in any form of illegal, exploitative or abusive activities involving children and vulnerable adults, including labor of children and vulnerable adults in violation of applicable laws, as well as human trafficking.
- 11) Invite unaccompanied children and/or vulnerable adults to private homes, unless they are at immediate risk of injury or physical danger; do not stay alone with a child without an urgent professional need.
- 12) Use children and vulnerable adults for domestic or other work that is not appropriate for their age and development, interferes with their education, puts them at risk of any physical or psychological injury, or is in violation of the law.
- 13) Performing any act or omission that is prohibited by law, or if it requires consent and such consent has not been given.

3. Combating trafficking in human beings

according to the Anti-human-trafficking Policy

Have to
 Take all necessary measures to prevent and combat all forms of human trafficking

- 2) Refrain from using official powers or any opportunities arising from their position to exploit, abuse, or coerce other persons, which would involve obtaining undue advantage for themselves or others.
- 3) Avoid any relationships and situations that may involve abuse related to trafficking in human beings or raise suspicion.
- 4) Work or cooperate in a way that prevents cases of trafficking in persons as much as possible.
- 5) Promote the principle of zero tolerance to human trafficking outside the workplace.
- 6) Take measures to prevent and combat trafficking in human beings as provided for in the Anti-human-trafficking Policy

1) Use of any form of trafficking in human beings or forced labor in the work of the network, including by Affiliates.

Prohibited

- 2) Participate/co-operate in activities related to trafficking in human beings, as well as benefit from such activities, including with the consent of the affected person(s).
- 3) Offer to exchange or exchange money, work, goods or services for sex, sexual services or other forms of degrading behavior or exploitation, even if such actions are recognized as legal in the jurisdiction in which they occur.
- 4) Have any sexual relationship between those providing charitable and humanitarian assistance and protection and a person receiving such assistance and protection that involves improper use of rank or position.
- 5) Use forced labor of any kind on any grounds.
- 6) Violate the terms of payment of wages (non-payment, withholding, etc.).
- 7) Use deception or fraud during employment.
- 8) Charge a fee for employment.
- 9) Destroy, conceal, confiscate an employee's identity documents or deny access to such documents.



- 10) Apply inadequate working conditions to employees and volunteers or provide or arrange housing for employees that does not meet legal standards, sanitary and technical requirements for living.
- 11) Forcibly restrain or control another person, restrict freedom of movement and communication, or use threats or blackmail.
- 12) Violate the requirements for sending an employee to perform work abroad in the case of cross-border employment, including in terms of issuing a written confirmation of employment, as well as paying transportation costs for the employee's return to the country of residence.

4. Prevention of conflicts of interest

according to the Conflict of Interest Prevention Policy

Have to

- Avoid any situations and actions that may cause a real/potential conflict of interest, or may affect impartiality and independence in the performance of official duties.
- Act only within the limits of the official authority granted and in a manner that does not allow damage to the business reputation of Caritas Ukraine and other employees.
- 3) Comply with all procedures for preventing, identifying, disclosing and resolving conflicts of interest established by the Conflict of Interest Prevention Policy.
- 4) Not take actions or make decisions in conditions of a real/potential conflict of interest.
- 5) Accept/offer gifts that meet the generally accepted notions of hospitality, if the value of such gifts does not exceed two subsistence minimums for able-bodied persons established on the day of acceptance of the gift, and the total value of such gifts received from one person (group of persons) during the year does not exceed four subsistence minimums for ablebodied persons established on 1 January of the year in which the gifts were accepted.
- 6) Comply with the requirements of the Conflict of Interest Prevention Policy regarding gifts, parttime work, family and kinship relationships, related parties, members of the management bodies, and procurement procedures for goods and services.

- Prohibited
- Use the financial resources of Caritas Ukraine to obtain goods and services to meet their personal needs or the needs of family members and relatives/related persons.
- 2) Use official authority to exert pressure on other persons or to obtain an advantage (favor) to achieve private interests.
- allow damage to the business reputation of Caritas Ukraine and other employees.

 Comply with all procedures for preventing, Comply with all procedures for preventing,
 - 4) Receive income/benefit in addition to income and remuneration received directly from Caritas Ukraine from a project, program or any event of Caritas Ukraine carried out within the framework of their official duties, including in favor of their family members and relatives/related persons.
- accepted notions of hospitality, if the value of such gifts does not exceed two subsistence 5) Use any information obtained in the course of their official duties for private interests.
 - 6) Engage in active public political and social activities (not related to the performance of official duties), including the use of funds and resources of Caritas Ukraine, including working time, telephone lines, email, etc. for personal participation in political or social events and their support.
 - 7) Directly or indirectly induce subordinates in any way to make decisions, take actions or omit to act in violation of this Policy in favor of their private interests or private interests of third parties.
 - 8) Use the name "Caritas" (in Ukrainian and in English) in the title of the social media account.
 - 9) Independently reimburse their own expenses or expenses that have not been previously agreed upon at the expense of Caritas Ukraine.
 - 10) Influence the organization of Caritas Ukraine's activities in any way, including by influencing the adoption, change of approved decisions, orders, policies and procedures, other internal documents in order to promote private interests, create preferences, advantages, benefits for third parties, both individuals

and legal entities.

5. Preventing corruption and fraud

according to the Anti-Corruption and Anti-Fraud Policy

- combat corruption and fraud, report any possible facts of such violations, and refrain from participating in corruption and fraudulent practices.
- 2) Refrain from using official authority or any opportunities arising from their position to obtain unlawful benefits for themselves or others, including the misuse of property or funds of Caritas Ukraine.
- 3) Avoid any relationships and situations that may involve corrupt/fraudulent practices or raise suspicion.
- 4) Work or cooperate in a manner that prevents corruption/fraud to the maximum extent possible, ensuring compliance with clear rules and transparent administration of all operational processes in the work, being aware of the constant risk of corruption, fraud and conflicts of interest in everyday work.
- 5) Promote the principle of zero tolerance and the eradication of corruption and fraud outside the work environment.
- 6) Apply measures to prevent and combat corruption and fraud as defined by the Anti-Corruption and Anti-Fraud Policy.
- 7) Accept/offer gifts that meet the generally accepted notions of hospitality, if the value of such gifts does not exceed two subsistence minimums for able-bodied persons established on the day of acceptance of the gift, and the total value of such gifts received from one person (group of persons) during the year does not exceed four subsistence minimums for ablebodied persons established on 1 January of the year in which the gifts were accepted.

- 1) Take all necessary measures to prevent and 1) Directly or indirectly offer, promise, provide, receive, accept or agree to accept or demand an unlawful benefit, including if it is provided (received) for the purpose of stimulating, providing an unlawful advantage for the employee personally or Caritas Ukraine as a whole.
 - 2) Provide/receive remuneration (including beneficiaries) for simplifying formalities, regardless of its amount.
 - Offer gifts to public officials and representatives of public authorities, donors, partners or any other persons, their employees/representatives, as well as their close associates, including family members and relatives, in order to influence decision-making, simplify formalities or with the expectation of receiving a favor in return.

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Перекладач Олекс Пар Рабзівіл Ю.О.

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Translator Radzivil Yu. O.

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