

ETHICAL CODE



NGO Epicentr for Children

Document approved on June 17, 2022

INTRODUCTION

The **Ethical Code** of the **NGO Epicentr for Children** is an official document of the NGO, prepared by its Board of Directors, and approved, in the session held on June 17, 2022.

It includes the principles and rules of conduct to which all those who work, collaborate or maintain relationships with the NGO Epicentr for Children are subject, such as partners, donors, beneficiaries, etc.

The purpose of this Code is to record and disseminate the values and standards of conduct to which the NGO Epicentr for Children wants to make constant reference in the development of its associative activity.

This Code is mandatory for all those persons or entities linked to the NGO Epicentr for Children, that is, for any subject, natural or legal person, who develops activities in the name and on behalf of the NGO, or who works, collaborates or lend services, both in Ukraine and in any other country or territory, for the NGO, and so particularly for those who perform functions of representation, administration or management of the NGO Epicentr for Children.

Control over compliance with the Code has been entrusted to a Surveillance Committee, which will propose to the Board of Directors any needs or opportunities to update or adapt this Code based on the evolution of the applicable regulations and the activities of the NGO.

This Code is available on the website of the NGO Epicentr for Children and will be personally communicated to all employees of the NGO Epicentr for Children. All entities linked to the NGO Epicentr for Children must adopt this Ethical Code or a similar one.

NGO Epicentr for Children, with NGO Entity Identification Code 33271480 in the Ukrainian NGO Register.





GENERAL ETHICAL PRINCIPLES

NGO Epicentr for Children was established in 2004 as a non-profit association and is registered in the Public Registry of NGOs in Ternopil, Ukraine.

The main associative purposes of the NGO Epicentr for Children consist of working with minors from Ukrainian society, in its fight against poverty, extreme vulnerability conditions and the integration of minors in socio-educational and socio-sports programs.

NGO Epicentr for Children, to date, is working with minors in Ukraine.

The **founding values** of the NGO Epicentr for Children are the following:

- Honesty
- Commitment
- Good faith
- Loyalty
- Straightness
- Equality
- Solidarity
- Nondiscrimination
- Transparency
- Responsibility

The aforementioned values guide the commitment of the NGO in carrying out its own activities and inform the ethical principles that govern all the activities of the NGO Epicentr for Children.

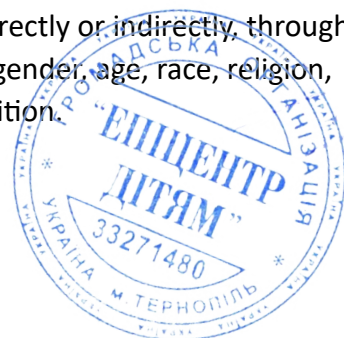
Legality.

The NGO Epicentr for Children is governed by respect for the laws and regulations in force in Ukraine. Workers, collaborators, suppliers, partners, donors and all those who are related to the NGO must assume this principle, so the NGO Epicentr for Children will not initiate or maintain any relationship with those who do not intend to abide by it or do not.

For the NGO Epicentr for Children no one can break the law.

Equality and non-discrimination.

The NGO Epicentr for Children undertakes not to favor, directly or indirectly, through its actions, any form of illegitimate discrimination based on gender, age, race, religion, political and union membership, language or health condition.





Guardianship and assessment of the person.

The value of the person, as such, is a fundamental principle that guides all the actions of the NGO Epicentr for Children, which is committed to favoring listening and dialogue as instruments both for proposing solutions to the beneficiaries, and in the assessment of the skills of their own collaborators.

In the exercise of its activity, the NGO Epicentr for Children defends and promotes human rights, collaborating and supporting other organizations that pursue this purpose. NGO Epicentr for Children undertakes not to favor, even indirectly, and, on the contrary, to denounce any abuse of which it is aware.

Diligence.

NGO Epicentr for Children requires its employees and collaborators to always work carefully and diligently in the development of their tasks and functions, optimizing the available resources and avoiding unnecessary or high-value expenses.

The NGO Epicentr for Children is committed to permanently promoting the training of its workers in order to improve their professional activity and performance.

Honesty.

The NGO Epicentr for Children requires its workers, partners and collaborators not to pursue a personal benefit, or aimed at the Association itself, violating current regulations and this Code, and all of them must even avoid any ambiguous conduct in the performance of their functions.

Commitment.

The NGO carries out all its activity with the commitment always to minors, the most disadvantaged minors and those at risk of marginalization. The commitment and permanent motivation of our NGO are non-negotiable values.

Transparency.

The NGO Epicentr for Children seeks maximum transparency in its activities: all actions and transactions must be correctly registered and authorized, so that they can be verified and supervised, according to current laws and internal processes. Any conduct that raises suspicions of misconduct is prohibited, without exception. The subjects linked to the NGO must be able to count on complete and detailed information on the activities that concern them. In particular, activities of an economic nature will be carefully monitored so as not to raise any suspicions about possible spurious benefits for the NGO Epicentr for Children, its employees or its collaborators and to guarantee non-profit conduct, in accordance with the nature and statutes of the NGO.





Equity and Impartiality.

The NGO Epicentr for Children undertakes to act in the same way with all the subjects with whom it has a relationship, although taking into account their different nature and condition.

The NGO Epicentr for Children demands objectivity and impartiality in the conduct of its workers in the performance of their duties and in the judgments and assessments that they must make or express.

Confidentiality, privacy and protection of personal data.

The NGO Epicentr for Children ensures in each sector of its own activity respect for the rules and commitments on confidentiality and personal data processing, forcing itself to establish the necessary protocols and train its staff and collaborators in these matters.

The NGO Epicentr for Children will process all the personal data it accesses in accordance with the law and guaranteeing the rights of the interested parties to their privacy and not allowing access and use by third parties of such data when current regulations do not allow it.

The workers and collaborators of the NGO are prohibited from using the information they access for purposes other than the strict performance of the functions entrusted to them.

Absence of conflict of interest.

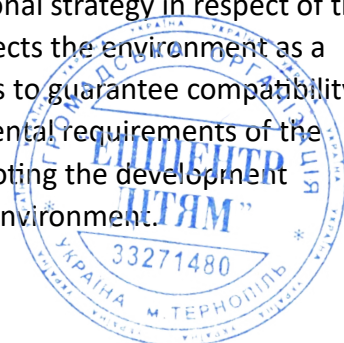
In the performance of their duties, the workers and collaborators of the NGO Epicentr for Children must avoid situations where the people involved are, or appear to be who are in a situation of conflict of interest.

A conflict of interest is understood to be the case in which any subject, to which this Ethical Code applies, pursues an interest different from the NGO's own purposes, or carries out activities that may, in some way, interfere with their ability to adopt decisions that are not the exclusive interest of the NGO Epicentr for Children.

In the event of a conflict of interest, the persons to whom this Ethical Code applies shall inform the hierarchically competent subject or the Board of Directors without delay.

Sustainable development.

The NGO Epicentr for Children prioritizes its own operational strategy in respect of the principle of sustainable development. The NGO also protects the environment as a primary good and defines its own activity in such a way as to guarantee compatibility between the execution of the projects and the environmental requirements of the territories in Ukraine in which they are carried out, promoting the development technologies and production processes that respect the environment.





Prohibition of sexual exploitation and abuse.

The NGO Epicentr for Children expressly rejects and prohibits any type of sexual exploitation and abuse. To this end, it will periodically develop internal control policies for such

behaviors and training among its staff and collaborators to prevent and avoid sexual exploitation and abuse within the NGO and in all the activities it carries out.

In addition, the NGO Epicentr for Children subscribes to the following principles of **Humanitarian Action:**

Humanity.

In emergency situations, particular attention must be paid to saving lives, alleviating the suffering of the most vulnerable, such as children, women, the elderly and the displaced.

Neutrality.

The NGO Epicentr for Children does not position itself in the face of conflicts within the framework of different political and/or territorial positions, and the actions of the NGO cannot suppose a benefit for any of these parties.

Impartiality.

The NGO Epicentr for Children helps all those who suffer, focusing on its founding principles on unprotected minors, without its work involving discrimination for any reason.

Independence.

The NGO Epicentr for Children works outside the political constraints of the territories we work in Ukraine.

RULES OF CONDUCT FOR THE INTERNAL AND EXTERNAL RELATIONS OF THE NGO EPICENTR for CHILDREN.

The rules of conduct, which are inspired by values and ethical principles, regulate the NGO's relations with and between:

- Donors / Partners / Suppliers.
- Workers / Collaborators / Volunteers / bodies of the NGO.
- Beneficiaries.
- Press and media.
- Public administrations and judicial bodies.

Relationship with Donors.

The relationship with donors is based on good faith, rectitude and transparency, therefore so much:





- It is forbidden to give, offer or promise money or other benefits and favors;
- It is forbidden to exert illegal pressure;
- It is not allowed to make statements that do not correspond to reality or with the purpose of obtaining public subsidies, contributions or financing;
- It is mandatory to identify the origin of the donations in accordance with the applicable regulations;
- It is forbidden to allocate sums received as subsidies, contributions or financing, for purposes other than those for which they have been granted;
- Rigor and austerity are necessary in the management of the available funds, keeping the costs of the operations within the minimum levels, in order to allocate the largest possible amount of the funds to their beneficiaries.
- It is necessary to carry out the activities valuing the structures, economic resources and local personnel, with the aim of contributing to the development of the territory in which it operates.

The NGO Epicentr for Children undertakes to reject donations of goods, services or money from companies that clearly do not respect human rights, workers and the environment, pornographic materials and any good or product that contributes, directly or indirectly, to the degradation of the human person and the environment and that do not have policies aimed at avoiding exploitation and sexual abuse.

Relationships with Partners.

The selection of Partners to carry out joint activities is based on the following criteria:

- The partner does not have to pursue purposes that are not oriented towards social purposes, in relation to the activity carried out jointly;
- Both the partner and the collaboration relationship must be governed by this Ethical Code.

Relationships with Suppliers.

In the selection of providers, the NGO Epicentr for Children:

- It will choose technical and economic operators from the territories in which it operates, where the necessary good quality of goods, works and services is guaranteed;
- It will carry out the selection of suppliers within the framework of competitions for the acquisition of goods, works and services, according to objective evaluations and respecting competitiveness, quality and economy;

Relations with Workers, Collaborators, Volunteers, Members of the Associative Bodies.

The main wealth of the NGO Epicentr for Children lies in its human resources. Relations with workers, collaborators, volunteers and the components of statutory bodies must





be carried out with reciprocal respect and must be based on an ordered set of duties and rights.

Duties of the NGO Epicentr for Children:

- Offer all workers the same opportunities for professional growth, based on criteria of merit, without any discrimination based on sex, age, disability, religion, nationality or racial origin and political and trade union opinions;
- Respect the principles contained in the Universal Declaration and the European Convention on Human Rights, the Convention on the Rights of the Child and the Convention on the Elimination of All Kinds of Discrimination Against Women;
- Respect international criteria concerning working conditions and fundamental worker rights, among which are the following:
freedom of association, right to organize, collective bargaining, suppression of forced labor, equality of opportunity and treatment, and other objectives pursued by the International Labor Organization (ILO);
- Guarantee an adequate and functional work environment for the activity that has been carried out.
to develop;
- Avoid any form of discrimination and abuse: all decisions related to human resources must be adopted according to criteria of merit and competence, without favoring previously appointed candidates;
- Reject any form of irregular or forced labor and exploitation;
- Prevent, avoid, reject and prohibit any type of exploitation and abuse sexual.
- Pursue the continuous improvement of the competences of each one, favoring the training and information processes, applying operational methods and strategies;
- Guarantee the recognition and appreciation of the competences and contributions of each one to the achievement of the purposes of the NGO;
- Guarantee the dissemination of this Ethical Code;
- Guarantee the protection of privacy;
- Guarantee the respect of the regulations regarding health, safety and occupational risk prevention;
- Guarantee adequate information on living conditions, health and safety measures that the workers and collaborators of the NGO must adopt in the regions in which the NGO operates.

Duties of the workers of the NGO Epicentr for Children:

- Respect the fundamental rights of the person with special reference to those of children, and avoid all forms of discrimination;





- Maintain a decent behavior and dress, respect for colleagues, partners, customs, cultures and religious denominations in accordance with the principles of the NGO Epicentr for Children;
- Proper use of the property and rights of the NGO;
- Respect the environment;
- Respect the centers and places of work;
- Inform about possible conflicts of interest of which they are aware.

All workers are always and in any case prohibited from:

- Participation in political activities without the explicit authorization of the NGO;
- Conduct from which damage may be derived, even if only to its image, for the NGO;
- Authorize or encourage the hiring of minor workers;
- Consumption and possession of psychotropic substances;
- Conduct that may be considered moral violence and abuse of authority through threats, harassment and psychological persecution that offend the dignity and psychophysical integrity of employees or subordinate collaborators, or that contribute to the degradation of the work environment;
- Maintain relationships of a sexual nature with minors;
- The execution of payments and transactions improperly and against the regulations on money laundering;
- The use and circulation of counterfeit or altered coins.
- Consent or participate in any type of sexual exploitation or abuse.

Relations with Beneficiaries.

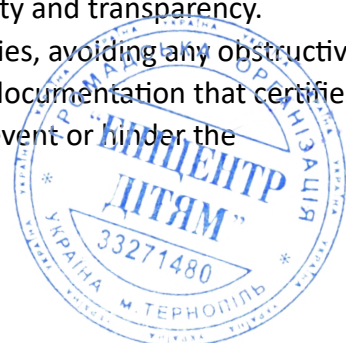
Beneficiaries must be duly informed about the ethical principles of the this Code and also about the activities, donors and resources used in the activities in which they participate.

Relations with the Press and the Media.

The public communication of its activities carried out by the NGO Epicentr for Children has to correspond to reality, be verifiable, and be defender and respectful of the rights and dignity of the person.

Relations with Control Bodies.

Relations with the subjects that carry out control and review activities must be based on the values and principles of diligence, good faith, loyalty and transparency. Maximum collaboration must be given to the control bodies, avoiding any obstructive behaviour. It is forbidden to hide information or provide documentation that certifies situations that do not correspond to reality, as well as prevent or hinder the development of control and review activities.





Relations with Public Administration and Judicial Bodies.

Relations with public administrations and judicial bodies are reserved exclusively for persons expressly authorized and with sufficient delegation for said function. Relations will be characterized by maximum transparency, good faith and traceability.

The NGO Epicentr for Children is committed to:

- Not improperly obtain subsidies or financing granted by Public Administrations, using or presenting false or inaccurate documents or omitting information;
- Do not use subsidies or public financing for purposes other than those for which they have been granted;
- Not unduly generate damage to Public Administrations.

With regard to relations with the Judicial Bodies, it is prohibited to condition or put pressure in any way on the persons called to testify or testify before the judicial authority, with the purpose of inducing them not to testify or to do so untruthfully. In addition, it is prohibited to provide assistance or cover up for those who have committed some type of misdemeanor or crime in order to avoid or obstruct the investigations of the Judicial or Administrative Authority or to collaborate with them.

RULES ON THE APPLICATION OF THE ETHICAL CODE.

Diffusion.

The NGO Epicentr for Children must widely disseminate this Code, communicating it directly to its employees and collaborators of all kinds and making it public through all public media and social networks to which it has access.

Area of Application.

This Code applies to all people who work or collaborate with the NGO: employees, volunteers, partners, members of the Board of Directors and of the Association's bodies; managers; auditors; advisers; consultants; partners; providers, donors and beneficiaries.

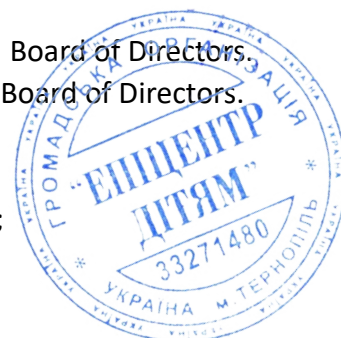
Surveillance Committee.

A Surveillance Committee is set up whose main task is to promote and supervise the proper application of this Code.

It will be composed of three members who will be appointed Board of Directors. At least two of them may not be part of the aforementioned Board of Directors.

In particular, the **Surveillance Committee**:

- Promotes the adequacy of the implementation of the Code;





- Proposes any updates to the Code;
- Investigates possible violations of the Code and notifies the competent bodies of the results of their investigations so that they may adopt the appropriate measures.

Prohibitions and Sanctions.

Observance and compliance with this Code is part of the contractual obligations of all who work or provide services to the NGO Epicentr for Children.

In the event that a violation of the Ethical Code is verified, the NGO will adopt with the person responsible for the violation the appropriate disciplinary measures of a labor, contractual or associative nature, in accordance with the applicable regulations.

Violations of the Ethical Code must be reported in writing to the Committee of Surveillance.

Signed and Sealed

Yaroslav Nestorivych
ONG EPICENTER for CHILDREN

PRESIDENT

