



HumanRights360

Code of Conduct and Ethics



Περιεχόμενα

About the Code of Conduct and Ethics	3
Obligations	3
Basic ethical values and principles of Human Rights360	3
Reporting of Violations and request for Guidance	4
Investigation of suspicions of violations	4
Violations	4
Obligations of Supervisors	4
Prohibition of Bribery.....	5
Interaction with Public Officials	5
Compliance with the requirements of Donors	6
Conflict of Interests.....	6
Gifts and Leisure	6
Treating others fairly and with respect.....	7
Safety and Protection	8
Sexual Exploitation and Abuse.....	8
Alcohol and workplace without drugs	8
Protection and proper use of equipment.....	8
Accuracy of books and files.....	9
Anti-fraud Policy	9
Record keeping	9
Information sharing, confidentiality and protection of personal data.....	9
Computers and Communication Material	10
Instructions on social media	11
Voluntary Action	11
Positions - Politics	12
Fundraising.....	12
Communication - Publicity.....	12
Copyright.....	12
Reminder.....	13
Non-development of rights.....	13
Application	13
Review of the Code	13
Publication of the Code.....	14



About the Code of Conduct and Ethics

The Code of Conduct and Ethics applies to all senior management and executive officers of Human Rights360, employees with any employment relationship as well as any third party cooperating with Human Rights360 in the provision of services or project implementation, including intermediaries, providers and any other person (natural or legal) who cooperates with the organization Human Rights360 in the framework of outsourcing or other agreement, to volunteers, trainees, as well as members of Committees (collectively "staff" or "employees").

The employees of the organization Human Rights360 must demonstrate responsible and ethical behavior and adhere consistently to the spirit and purpose of this Code.

The successful completion of the goals of the organization Human Rights360 depends to a large extent on the reputation of its staff, the integrity and the high ethical standards in the whole range of its activities. Integrity is at the core of any professional relationship and for this reason the behavior of the staff must be impeccable in every way.

Obligations

The staff of the organization Human Rights360 is responsible for the understanding, observance and application of the principles and values set out in this Code, even outside the workplace and outside working hours, as these are principles, the violation of which has a direct impact on the Organization and its work regardless of where and when the violation will take place. If anyone has questions or concerns about the content of the Code, they should address them at the Department of Human Resources of the organization. A relevant statement confirming the receipt of the Code of Conduct and Ethics must be signed by all staff.

Basic ethical values and principles of Human Rights360

Human Rights360 has expressed its commitment to adhere to integrity and high ethical standards throughout its range of operations.

Furthermore, the organization Human Rights360 follows professional practices that are characterized by high ethical standards and ensures that its relationship with others is governed by respect, honesty, trustworthiness, integrity, consistency, equal treatment, objectivity and impartiality. The progress of the staff and the provision of high-quality services remain a priority of the organization.

Human Rights360 aims more at group collaboration rather than individual work. Without limiting the independence of employees and defining roles and responsibilities, the organization promotes team spirit in its activities and seeks the exchange of views and knowledge as well as the use of different approaches to achieve common goals.



Through experiences and team spirit, the organization Human Rights360 seeks to act proactively. All Human Rights360 relationships are governed by transparency, as part of its efforts to provide accurate, fair, timely, regular, reliable and accessible information.

The organization Human Rights360 aspires to maintain a high level of social responsibility, respecting and promoting human values, as well as high social, spiritual and cultural values.

Reporting of Violations and request for Guidance

If you know or suspect that there is a breach of any applicable law or regulation of the European Union, of national law, this Code or other policies of HumanRights360, report this suspicion / information immediately to the Management of the organization, with the following highlight: if the information that concerns signs of violation is incomplete, it is recommended that you first contact the Head of Human Resources of the organization, who will of course inform the Legal Representative and the Director-General, but will also be obliged to undertake specific actions to investigate these indications and strengthen their documentation. Human Rights360 unequivocally prohibits retaliation against employees as a result of a bona fide report of a suspected breach of the Code of Conduct. If you have any questions about this Code or other policies of HumanRights360 or if you are not sure on how to best address such a situation, please contact the organization's Head of Human Resources.

Investigation of suspicions of violations

All reports regarding breaches of the Code of Conduct will be duly investigated and treated with the utmost confidentiality. Human Rights360 reserves the right to determine the manner and extent to which any examination / investigation will be conducted. It is the duty of everyone involved to communicate honestly and to cooperate fully in the investigations and audits of the organization. It is also important that you do not attempt to conduct your own preliminary examination / investigation. Investigations often involve complex legal issues, and your own actions can jeopardize the integrity of an investigation and damage the organization.

Violations

Under applicable law, employees who violate this Code, other policies of HumanRights360 or the law may be subject to disciplinary measures, reaching up to the termination of the contract.

Obligations of Supervisors

Individuals who supervise other employees have additional responsibilities under the Code. They must:

- Be an example of ethical behavior through their own behavior and the way they supervise the work of others.



- Ensure that self-supervised individuals have sufficient knowledge and resources to comply with the Code.
- Monitor compliance with the Code by the people they supervise.
- Apply the Code fairly and consistently.
- Support employees who, in good faith, ask questions or concerns.

Employees often come to their supervisors to report a suspicious misconduct and it is important that they feel comfortable doing so. If you supervise other employees, make yourself available to listen to the employees' concerns and respond appropriately. If an employee reports a potential breach to you, contact the organization's Human Resources Department immediately to investigate. The organization is strict in the policy of non-retaliation which is extremely important. As a supervisor, you have a responsibility to ensure that there will be no retaliation, and this may require monitoring the situation.

Prohibition of Bribery

Human Rights360 rejects all acts of bribery and takes all measures to prevent and discourage actions related to bribery. A bribe is an offer, promise, concession, application for or acceptance of a privilege in exchange for an action that is considered illegal or abusive. All the staff of the organization of Human Rights360 are responsible for the prevention, deterrence and reporting of such cases. As part of the effort to protect the reputation of the organization of HumanRights360, every employee must:

- Not offer or promise any financial or other benefit to any individual, government officials, civil servants or anyone else, in order to entice and reward, act in breach or reward for any illegal act/activity. For more information, see the Anti-Bribery Policy.
- Not accept gifts in the form of cash (regardless of amount) or goods (tips, accommodation, significant discounts on purchases of goods or other). The prohibition does not concern promotional gifts of low value, symbolic gifts for Christmas, Easter, anniversaries or name day, which are traditionally considered socially acceptable. In any case, the value of the gift should not exceed the amount of 50 euros. In all other cases, the employee should report the receipt of the gift to the Human Resources Department.
- Not seek to secure any kind of benefit or advantage by exploiting the acquired skills and any privileged position as an employee of the organization inside or outside it.

The prohibition on bribery applies to employees, as well as associates, volunteers and suppliers of Human Rights360, who have been entrusted with activities under an agreement.

Interaction with Public Officials

As a humanitarian, non-profit organization, Human Rights360 makes no payments or contributions to any political party, candidate for government office or campaign. In addition, care must be taken not to engage in advocacy activities without proper guidance and approval. Before meeting or



communicating with civil servants or officials to influence legislation or other government proceedings, the staff of HumanRights360 should contact the organization's Management and Legal Adviser for guidance.

Compliance with the requirements of Donors

We are committed to meeting the obligations we undertake towards our donors. When working on a project, you need to understand the relevant requirements of each donor. You must know the amount of allowable and eligible costs for each project and comply with all applicable rules and procedures of the organization, including the proper completion and retention of worksheets.

Conflict of Interests

The organization Human Rights360 takes all necessary measures to prevent and avoid the occurrence of conflicts of interest. A conflict of interest occurs when your personal interests or your degree of legitimacy conflict with the interests of the Organization of HumanRights360. A conflict situation can make it difficult for you to perform your tasks impartially.

For example, conflicts may involve situations where you have a vested interest, a stake / shares, or an employment or partnership relationship with an organization that works with Human Rights360, such as a supplier. Conflicts of interest also occur when your spouse or partner, your children, your parents, your siblings (by blood or by marriage) or another close family member are either a competitor, supplier or partner of the organization or have been hired by one of them.

As an employee, project manager or associate of Human Rights360, you should be able to identify and report any real or potential conflicts between your personal interests and the interests of Human Rights360 to your supervisor or director, as appropriate, and to the Department of Human Resources.

For the Project Selection Process in particular, it is considered that there is a conflict of interest when a person involved in the process (e.g., independent experts, members of the selection committee, staff participating in the project eligibility evaluation) has direct or indirect interests that are or appear to be incompatible with the impartial and / or objective exercise of their duties in the selection process.

Such a conflict of interest may arise primarily on the basis of financial interests, political or national proximity, family or emotional ties or any other related common interests that may affect the impartial and objective nature of the selection process. Depending on the type of relationship and the consequent potential conflict, the person involved may be right to abstain from the selection, the voting or even the wider discussions or evaluation of an individual issue.

Gifts and Leisure

When participating in the strategic decisions of Human Rights360, your decisions must be based on an objective and impartial judgment. Accepting gifts or other benefits from applicants, suppliers or



other partners can affect your judgment. For this reason, gifts, meals and entertainment are only permitted if they are part of a commonly accepted professional context (for name day, Christmas, Easter or other occasions, which are traditionally and socially acceptable and offered within the framework of social communication), have only a small value (up to 50 euros), are given and received with the explicit or implicit understanding that you are not in any way obliged to accept the gift. Gifts in cash are prohibited and must be returned. If this occurs, any member of Human Rights360, whether an employee, consultant, independent expert or subcontractor, should notify the organization's Human Resources Department immediately.

As a non-profit humanitarian organization, Human Rights360 strongly discourages its employees from offering gifts or entertainment to others. In case of unexpected situations, when you provide a gift, benefits of any kind or related to the activities of the organization Human Rights360, you must not offer or provide any gift that exceeds the value of 150 euros. There are strict regulations governing the provision of gifts, meals or other valuables to government officials. Do not offer any valuables to government officials or their employees or family members without the prior written approval of the organization's Management and Legal Adviser.

Treating others fairly and with respect

Our human resources include talented professionals from a wide range of cultural backgrounds. Human Rights360 is an equal opportunity employer. Decisions regarding working conditions - such as recruitment, promotion, remuneration and termination of contract - must be based on the qualifications, experience, expertise and performance of each employee. Human Rights360 strongly condemns and will not tolerate any form of sexual harassment to and from any employee, consultant or any person, including, among others, supervisors, associates, visitors, or recipients of a concession or sponsorship.

In addition, HumanRights360 strongly condemns and will not tolerate discrimination or harassment of any of its employees on the basis of race, color, religion, sex, sexual orientation, age, disability, marital status, ethnicity or other applicable law.

Human Rights360 is committed to maintaining a work environment free of harassment and discrimination. Human Rights360 insists that it is the responsibility of all its employees and staff to assist the organization in creating a workplace free of sexual harassment and other illegal activity, citing incidents of such behavior at any time at the Human Resources Department.

Any behavior that interferes with the performance of work, diminishes the dignity of any person or creates an intimidating, hostile or aggressive work environment will not be tolerated. This includes harassment of workers or other persons on the basis of race, sex, age, sexual orientation or any other protected category under applicable law. If you believe that you have been harassed or discriminated against in any way, report the incident immediately to your HR Manager, following the relevant complaint/grievance/whistleblowing policy.



Safety and Protection

As our work often leads us to difficult places, the safety and protection of our employees must be our first priority. Occupational health and safety remain a priority for Human Rights360, in order to ensure a safe working environment, improve the quality of work life of employees and avoid related risks.

It is not expected or encouraged at any stage of the performance of your duties to endanger your personal safety or that of any colleague, associate or beneficiary. In addition, the possession of weapons is expressly prohibited.

Human Rights360 has adopted security and protection policies and protocols designed to protect and educate you on response measures, especially in the event of natural disasters. In this regard, it prepares response action plans for fire safety and crisis management purposes. Please take seriously Human Rights360 policies in this area. See Security and Protection Policies for more information.

Sexual Exploitation and Abuse

Sexual exploitation and abuse by the staff of the organization Human Rights360 is expressly prohibited. Sexual activity with a person under the age of 18 is prohibited regardless of the age that is considered "legal" at the jurisdiction of operations. Employees are prohibited from having sex with beneficiaries, as these relationships are often based on unequal power dynamics and can undermine the credibility and integrity of our humanitarian work. The organization discourages its staff and associates from engaging in relationships (including receiving sexual services) that may be based on an imbalance of power and exploit the other party's disadvantaged position. You must report any suspicion of sexual exploitation or abuse, whether committed by a staff member of Human Rights360 or another organization. See the policy against sexual exploitation and abuse.

Alcohol and workplace without drugs

Human Rights360 is committed to maintaining a safe and healthy work environment free of alcohol and drugs. Every employee is expected to work without the effects of alcohol or other over-the-counter medications / psychoactive substances.

Protection and proper use of equipment

We all have a duty to protect the assets of the organization of HumanRights360 from damage and to ensure their effective use. Theft, misappropriation and disposal of material may have a direct impact on the services we provide to beneficiaries. With few exceptions that must be authorized, the assets of HumanRights360, including equipment, materials, proprietary and the information at the of the organization, and working time, must be used only for the activities of the organization and not for personal use. For more information, see the Fraud Prevention Policy.



Accuracy of books and files

The work of Human Rights360 is funded by institutional and governmental organizations and private sponsors, who require Human Rights360 to maintain accurate books and project files. You must complete all HumanRights360 documents accurately, truthfully and in a timely manner, including documents relating to working hours as well travel reports and reports on costs.

The financial activities of HumanRights360 must be recorded in accordance with the policy and accounting practices of the organization. Never create a false or misleading report or registration and make no payment or write off debts for Human Rights360 for any purpose other than that described in the supporting documents. For more information, see the Anti-Fraud Policy.

Anti-fraud Policy

Human Rights360 can be exposed to the risk of fraud and illegal activities at any time and if such a risk is not addressed in a timely and effective manner, this could have a negative impact on the activities of the organization.

The organization HumanRights360, with the aim of combating the phenomenon of fraud, has established an integrated anti-fraud policy. This Policy applies to all staff of the organization and its main points are summarized as follows:

- Raising the awareness of the employees of the organization HumanRights360 on the prevention and fight against fraud.
- Training the staff and creating a unified professional behavior and culture for fraud prevention.
- Defining and describing the relevant actions to be undertaken by HumanRights360 in case of fraud.
- Developing control systems, procedures and mechanisms that contribute to the prevention and deterrence of fraud.

Record keeping

Human Rights360 creates and maintains a large number of files. Contracts and applicable laws require that we keep records of projects and actions for certain periods of time. We must comply with the laws and policies of the organization HumanRights360 regarding the record keeping.

Information sharing, confidentiality and protection of personal data

Human Rights360 operates on the condition that the information produced through its funded actions, as well the information about them, be made available to the public in a timely and comprehensible manner. The organization HumanRights360 hopes that this self-evident extroversions aims at providing information about our work, encourages transparency in the field of non-profit organizations, enriches the public debate and contributes to a better understanding of issues that are important for the Greek civil society.



To this end, Human Rights360 provides access to information about its activities through a variety of media, including its website, press releases, skills development workshops, periodic reports and summaries, fundraising initiatives and publicity initiatives.

At the same time, Human Rights360 seeks to protect trusting relationships with jobseekers, recipients or sponsors, and employees, and to maintain a confidential framework in its planning and discussions.

Human Rights360 maintains a balance between confidentiality and public information about its projects and activities. However, very often, sensitive information is usually an example of confidential information. "Confidential" is the information that comes to the perception of employees, either directly or indirectly, during their work. Human Rights360 takes every measure to ensure the confidentiality of sensitive information and is committed to protecting confidential information and using it only for the purpose for which it was originally provided. All staff must maintain the confidentiality of the information provided to them by the organization, its beneficiaries and any other operational partner.

Human Rights360 complies with a series of data protection laws around the world. The organization relies on its staff to ensure the confidentiality of data, giving access to confidential data only after approval procedures and based on a proven need to provide this confidential information, without reproducing or discussing this information with any individual, who is not authorized or approved to know this information. Your obligation to treat information as confidential does not end when you stop working with Human Rights360. Upon termination of your partnership with the organization, you must return everything that belongs to the Human Rights360 organization, including all documents and other material relating to the organization as well as the confidential information of the beneficiaries.

Computers and Communication Material

We must keep our computers and all the media of the organization safe. In addition, when you use HumanRights360's equipment or media to send emails or access Internet services, you should be aware that you are acting as a representative of the organization. Improper use of these tools has a negative impact on the reputation of the organization Human Rights360 and exposes our credibility.

The HumanRights360 computers and media belong to the organization and are intended to be used by the staff to carry out their activities. To the extent permitted by applicable law, Human Rights360 reserves the right to monitor these media.

For this purpose, you must not install or use any software other than that installed by Human Rights360 in accordance with system security requirements. You must use Internet for business purposes and in the context of your duties, without compromising system security.

Staff access to social media using the organization's equipment is prohibited, unless written permission has been given by the person in charge. You need to make sure that the IT equipment is used only by authorized persons, even when the spaces of work remain unattended for only a few minutes. You must keep your passwords in the organization system and never reveal those passwords to others.



Instructions on social media

Social media includes all means of communication or posting information or content of any kind on the Internet, including but not limited to your own social networking account or blog, other person's magazine or calendar, personal website or newsletter, social networking site, web bulleting or chat room, video or wiki posts, sites like Facebook and Twitter, chat rooms, whether or not they are affiliated with HumanRights360.

HumanRights360 respects the right of its employees to use social media as a means of self-expression. However, we urge you to follow these instructions when posting:

- If you choose to identify yourself as an employee of HumanRights360, please note that some readers may treat you as a representative of the organization. Let your readers know that the views you express are your own and do not necessarily reflect the views of Human Rights360.
- Make sure the information you post is true.
- Do not publish or disclose personal or confidential information of HumanRights360, including, for example, programs and financial information or documents issued by the organization, as defined in the Terms of Confidentiality and Internal Affairs of the Organization HumanRights360m included in the employment contract.
- Do not publish, unless authorized in writing by HumanRights360, the following:
 - photos of beneficiaries, unless you have explained to them that the image may be distributed locally and globally and that you have obtained their consent (if they are minors, permission from their parent / guardian) and the consent of the Management of HumanRights360,
 - any copyright-protected works of Human Rights360.
- Operate with respect for Human Rights360, our employees, our beneficiaries, our partners and our members.
- Make sure your online behavior does not violate the organization's policies of discrimination and harassment.

Voluntary Action

The organization HumanRights360 has a special respect for volunteer work. The policy of the organization is to encourage volunteering by staff members who wish. At the same time, Human Rights360 must ensure that organizations with which its staff is involved in volunteering do not have an unfair advantage over existing competition for funding.



Positions - Politics

In case a staff member collaborates with another organization, this should be notified to the organization's Human Resources Department.

If staff are invited to serve on a political working group or committee dealing with public policy issues, this should be communicated to the Human Resources Department, which will decide accordingly.

Fundraising

The members, staff and external partners and advisors of Human Rights360 may face special situations, especially when asked to help raise money for an organization. They should feel free to provide such assistance, making it clear, however, that they do not act or represent the organization of Human Rights360. In any such case, this must be notified to the Human Resources Department.

Communication - Publicity

Only authorized Human Rights360 staff may receive invitations from another organization to make a speech or contact media representatives, to authorize or send letters, or to make other similar announcements about any publication. Unauthorized staff should refrain from verbally communicating with the media as a representative of Human Rights360, as well as giving interviews or writing articles and proceeding to publications, announcements and general statements (written or oral) about the activities of the Human Rights360 without prior approval of the organization.

Copyright

Human Rights360 activities can lead to the production of tangible intellectual property products, such as reports, documents, manuals, photographs, videos, documentaries, etc. Human Rights360's policy is to ensure that all products created and copyrighted under its activities, benefit the public and the non-profit industry. To this end, the organization Human Rights360 seeks the rapid and widespread dissemination of all intellectual property products at minimal cost or, where justified, at a reasonable cost.

Human Rights360 encourages research efforts and freedom of access to its intellectual property products. Programmers are also encouraged to explore opportunities to use existing and emerging Internet distribution models and, where appropriate, Creative Commons or similar mechanisms that lead to a broad distribution to the interested sector and its public.

However, Human Rights360 recognizes that there may be circumstances where limited or delayed distribution of copyrighted products or limited access to data may be preferable in order to protect the legitimate interests of third parties or the organization itself. These circumstances are assessed on a case-by-case basis.



Reminder

The ultimate responsibility for ensuring that Human Rights360 complies with all laws, regulations and ethical standards that affect our work lies with each of us. Human Rights360 relies on you to do our work ethically, to be able to continue to help people and to carry out the important work we do.

Non-development of rights

This Code of Conduct and Ethics is a policy statement on individual and professional conduct and is in no way an employment contract or the provision of permanent employment. The Code is not intended and does not create obligations or rights to any employee, volunteer, customer, supplier, competitor, donor or any other person or entity.

Application

Every employee, consultant, employee, etc. of the organization Human Rights360 must respect and comply with this Code. All of the above assume the responsibility to prevent actions that may not be in accordance with the commitments of the organization Human Rights360 under this Code.

There are several ways in which investigations for the application of the Code can be conducted or a possible breach can be reported without the risk of retaliation as a result of such reports:

- Employees, etc. have the right to express their concerns and to report issues related to the Code to the Human Resources Department, which is responsible for overseeing the proper implementation of the Code and providing guidance on how to deal with any breach of the Code.
- Employees, etc. should immediately report to the Management, i.e., to the Director-General, the Legal Representative and the Head of Human Resources on any matter or information that may arise regarding a possible breach of the principle of zero tolerance for bribery and corruption.

The organization HumanRights360 examines the submitted reports, adopts corrective measures and, if it is found that a violation has occurred, it imposes sanctions. It is noted that the organization Human Rights360 takes every measure to protect the identity of any employee or staff member who can report in good faith a possible violation of this Code.

Review of the Code

The Human Rights organization360 reviews the Code annually to ensure that it is in accordance with the principles and rules adopted and applied by the organization. In case the revision is deemed necessary, it is carried out. In case of modification of the Code, the organization provides for the timely communication of the revised Code to the staff in any appropriate way.



Publication of the Code

The Code is available to the staff of the organization HumanRights360 through the local network (intranet) in Greek and English, as well as in the Offices of the organization. In this way, Human Rights360 seeks to enhance transparency as anyone concerned has the opportunity to access and evaluate the core values, rules and principles that govern the operation of the organization.