

CODE OF ETHICS

Fondazione Skychildren ETS



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PREMISE

Art. 1 - About us

Skychildren Foundation was established in 2011 (then Vital Italy) when 4 friends decided to directly intervene in the support and care of the most unfortunate children living in the most unfortunate regions of the world, especially in Calcutta, in India. Since then, with increasing commitment and with a concrete and effective approach, Skychildren has dedicated itself to fighting hunger, disease and other hardships that threaten the future of these children. Skychildren is an urgent need to improve the living conditions of these disadvantaged children, through education, psychological and health care and support for the entire community. Thanks to the flexible structure, it guarantees the direct delivery of donations arriving within 6 months, directly to children. 100% is for the children, "100% is for children because the management and administrative costs are entirely covered by the founding members with voluntary contributions". The Founding Members personally take care of the selection, control and coordination of the projects and go twice yearly to India to carry out careful supervision.

In 2024 Skychildren Onlus has been transformed into **"Fondazione Skychildren ETS"** Fondazione Skychildren ETS (henceforth the Foundation) collaborates with some of the world's largest NGOs, but also with efficient local organizations well rooted in the community, to ensure the success of the funded projects.

DEFINITION OF THE CODE OF ETHICS

Art. 2 - What is the Code of Ethics

The Code of Ethics is a voluntary institutional agreement signed by the Members in order to ethically regulate the relationships between them, the Foundation and its collaborators. In the Foundation every **volunteer** has roles and responsibilities that involve multiple, diverse and integrated relationships: this implies, on the part of everyone, both the recognition and respect of their rights, duties and individual responsibilities, recognition and respect of the rights, duties and responsibilities towards the institution in which they are part of and towards all of the collaborators.

Art. 3 - Scope of application, addressees

In the Foundation, all recipients are required to carry out their work in compliance with this Code of Ethics. Specifically, this Code must be respected and applied in all its contents by the President, members of the Assembly of Members, members of the Board of Directors, Treasurer, Volunteers, Students or Interns, Consultants, Professionals and Collaborators, from donors and local representatives, without exception.



This Code must also be respected by all those who, although external, operate for the Foundation itself; for example: those who maintain relationships with the Foundation without any relationship of subordination, consultancy relationships, agency relationships and other relationships that result in a professional service, not subordinated, either continuous or occasional (including persons acting for suppliers and partners).

The recipients listed above are also required, within the limits of their respective competencies and responsibilities, to ensure that third parties comply with the principles of this Code of Ethics and the related rules of conduct. Membership of the Foundation implies observation of the general legal regulations in force as well as acceptance and full adherence not only to the Statute of the Foundation, but also to this Code of Ethics.

Under no circumstances is it justified to adopt behaviors contrary to those set out in this document.

To this end, it is envisaged to insert, in the letters of appointment and / or in the agreements, specific clauses aimed at confirming the obligation on the part of the external party to comply fully with this Code, and to provide, in the event of violation, a warning for punctual compliance with the Code or the application of penalties or termination of the contractual relationship.

Art. 4 - Purpose and rules of behavior

The Code of Ethics must constitute a normative instrument capable of permanently modifying the behavior of individuals, certifying the adherence of the Foundation of Members to all the ethical values constituting the purpose of the Foundation itself.

Within the Code, the Foundation aims to meet the following requirements:

- confirm to those who are familiar with the Foundation and make known to those who come into contact with it for the first time the objectives, principles and values on which the action of the Foundation is based, as an indispensable part of its heritage cultural and foundation of its mission;
- make individuals involved in the activity of the Foundation aware of their rights, duties and responsibilities, equipping them with an instrument that safely guides their actions and behaviors;
- promote the achievement of a high standard of professionalism, fairness and transparency by anyone who works in the name of and on behalf of the Foundation;
- provide awareness of critical issues that emerge in the action of the Foundation and in procedures, to prevent conduct that does not conform to the principles and values accepted by the Foundation, the objectives to be achieved and the



- relevant national and international regulations, to this purpose, also preparing supervisory and sanctioning instruments;
- o constitute an effective tool of knowledge of the Foundation for anyone wishing to support their activities and projects with their own personal and economic contribution.

Art. 5 - Structure of the Code of Ethics

The Code of Ethics consists of four parts:

- I. the first defines who we are and the mission of the Foundation, indicating those that are the general principles to which the Foundation, in all its components, inspires its mission.
- II. The second defines and dictates the structure of the Code of Ethics, the rules of conduct for the various types of recipients,
- III. the third defines the Code of Ethics
- IV. the fourth, the structure for the implementation and control of the effective application of this document.

VALUES AND GENERAL ETHICAL PRINCIPLES

Art. 6 - General values and ethical principles

The Foundation considers the act of observing the values of honesty, loyalty, correctness and compliance with international laws and conventions to be indispensable for its actions and requires that these ethical principles inform the work of all the recipients of the Code. The Foundation has identified and recognizes itself in the following values that express their mission and guide the work of all those who work for it:

- o **Transparency:** This is inspired by the principle of transparency in communication and is committed to providing anyone with an interest, clear, truthful and complete information, within the limits established by current regulations. The Foundation undertakes to guarantee the maximum transparency of its administrative and management activities and to create the conditions for the participation of the Directors and Founders in the decisions to be taken within their respective functions and competences, widespread and aware and adequate, through timely information mechanisms. All those working for the Foundation are personally responsible for using resources efficiently, and adopt the highest level of transparency towards donors and partners, work with accuracy and transparency in the management of accounting and funds and in compliance of the destination of resources for the realization of the Projects.



- **Correctness, honesty, loyalty, and professionalism:** The regulation, which is the object of this Code, is also intended to promote, implement and protect, in the general interest, the correctness of the Foundation's work and its consequent consideration towards the community, of the State, of the public opinion and in general of all those subjects that, directly or indirectly, permanently or temporarily, establish relationships of collaboration or operate in the interest of the Foundation. The Foundation considers of fundamental importance the performance of professional services by employees according to correctness, honesty, loyalty, commitment and professionalism, marking their behavior to mutual respect, cooperation and collaboration regardless of their hierarchical position within the Foundation also in order to protect its image and to provide high quality performance.
- **Collaboration:** All those working for the Foundation pursue mutual respect, value diversity, and work with partners by joining forces globally to improve the lives of children. The behavior of collaborators, consultants and contacts who do not comply with the principles expressed in the Code can be considered by the Foundation as a cause of injury to the relationship of trust and just cause of termination of contractual and / or collaboration relations.
- **Equality and anti-discrimination:** Discrimination, harassment and personal, sexual or other abuse and any kind of discrimination are not permitted. The Foundation undertakes not to favor, directly or indirectly, through its own conduct any form of illegitimate discrimination based on gender, age, race, religion, sexual orientation, political and / or union affiliation, language or health status of its collaborators. The Foundation refers to Article 2 of the Universal Declaration of Human Rights: "Every individual is entitled to all the rights and freedoms set forth in this Declaration, without distinction, for reasons of race, color, sex, language, religion, political opinion or otherwise, of national or social origin, wealth, birth or other condition. No distinction will be established on the basis of the political, legal or international status of the country or territory to which a person belongs, whether independent, or subject to fiduciary or non-autonomous administration, or subject to any limitation of sovereignty".
- **Freedom and Autonomy:** All people belonging to the Foundation are free to express, in a reasonably critical form, opinions on the activities and government of the institution, which must always be marked by respect for the dignity of people, the correctness of language, to institutional loyalty and in full observance of the statutory rules.



- **Value of Human Resources:** Human resources are recognized as a fundamental and non-transferable factor within the Foundation. The Foundation therefore recognizes the centrality of human resources, which requires professionalism, dedication, loyalty, honesty and a spirit of collaboration.
- **Destination of funds:** The allocation of funds must be clearly explained and linked exclusively to the implementation of specific projects. The Foundation is committed to pursuing an effective, efficient and forward-looking use of human and financial resources. The results of the activity carried out through the use of the resources of the Foundation must be made known to the community.
- **Compliance with current legislation:** The Foundation carries out its institutional mission in compliance with the rules of the current legal system, rejecting corruption and any illegal practice. The Foundation refuses any behavior contrary to the juridical norms and the Code of Ethics, put in place by its collaborators in the execution of the tasks and assignments entrusted to them.
- **100% for children:** The Foundation guarantees the free activity of the members and statutory bodies for the pursuit of its goals, the costs of organizational and operational management are in fact borne by the Founding Members.
- **Constant supervision of projects:** Through constant contact with project managers abroad and with beneficiary communities. Supervision also takes place through visits to the places where the projects are carried out every 6 months by the 4 Founding Members in first person through the payment by the same of specific contributions.
- **Transparency of financial management:** Accuracy and transparency in the management of accounting and funds and respect for the allocation of resources for the implementation of projects according to criteria of clarity and completeness. In keeping the accounts, the Foundation ensures transparency and total traceability of every single transaction and financial transaction, so that every transaction is correctly recorded, verifiable and complete and that the financial statements are prepared according to criteria of clarity and completeness and are easily accessible to everyone. The accounting is organized in such a way that any sum received or paid by the Foundation will find full and exact correspondence in the annotations reported in the accounting records. For every accounting entry that reflects a transaction, a



complete and adequate supporting documentation as well as the relative authorization must be kept. This documentation must identify the date and the reason for the transaction that led to the accounting recognition. The supporting documentation must be easily retrievable and archived according to suitable criteria that easily allows consultation even by external bodies authorized to control.

- o **Data processing -privacy protection- GDPR (General Data Protection Regulation)**

The Foundation protects the confidentiality of information and data relating to collaborators or third parties, collected on the basis of or during the performance of the institutional activity. All those who work in any capacity for the Foundation are required to process any information learned in the performance of their work as confidential, in compliance with the legislation on privacy pursuant to Legislative Decree no. n. 196/2003. They are required not to disclose or request unduly information on documents, sensitive information of users of services, and in general on all information acquired in the exercise of their functions.

RELATIONS WITH THE THIRD PARTIES

Art. 7 - Relationships with Donors and Supporters - For the fulfillment of its mission, the Foundation avails itself of the contribution of the members, as well as the financial support of donors and private supporters. For the Foundation, the contact with the donors represents the instrument to promote an authentic culture of solidarity, not limited to the mere economic contribution, but based on personal emotional involvement. The Foundation ensures maximum confidentiality of the identity of private donors, the correct handling of confidential information and the maximum protection of personal data collected in the performance of their duties, in strict compliance with the current regulations on the subject. The Foundation undertakes to provide donors, through the methods indicated in the Articles of Foundation a clear and truthful information on the purpose it pursues, on the purposes, timing and methods of implementation of the initiatives and Projects to be supported, as well as the relative updates, on the activities carried out through the use of the funds themselves.

Art. 8 - Relationship with Partners - The Foundation selects the local contacts and collaborators whom it uses through a thorough preventive verification of the ethical and human qualities and professional requirements and guarantees constant vigilance



on their work. Contact persons and collaborators abroad must share the guiding principles of the Code and commit themselves to respecting the rules. Relations with foreign contacts are formalized in a written agreement that establishes such commitment and discipline in a timely manner the terms of assistance, the services to be provided and the economic conditions of the collaboration relationship. Relationships with Partners are based on loyalty, correctness and a spirit of collaboration. Should the cooperation prove to be ineffective or in the course of the joint action should irreconcilable conflict emerge in the way of working of the Partners / profiles, with the principles of the Code and with the values accepted by the Foundation, the latter undertakes to cease the collaboration relationship.

Art. 9 - Relationship with Communication and Press - The Foundation addresses the mass media and mass media only through its President or the Founding Members, in an attitude of absolute correctness, availability, and transparency. The Volunteers or Supporters cannot enter into relations with the mass media or issue public statements, data and information concerning the Foundation and, if in any way contacted by information operators, direct the applicant to the persons designated for this purpose. Communications relating to the Foundation destined to the outside must be aimed at encouraging the correct knowledge of the mission and its Projects through clear, accurate, truthful, complete, verified and homogeneous information. In relations with the press and other media, it is forbidden to disclose personal data and disclose confidential information regarding donors or children from the protected Foundation.

OPERATIONAL IMPLEMENTATION and CONTROL

Art. 10 - The violations of the Code of Ethics carried out by persons who do not hold the status of members such as volunteers, professionals, collaborators, consultants and suppliers, previously established in a manner similar to those used towards the members, determine the suspension and / or termination of the relationship and the prohibition to use for the future the collaboration and / or professional services of the person who has been found responsible. The **General Manager** is the person responsible for verifying the application of the Code of Ethics. In particular, the General Manager has the task of disseminating the Code of Ethics to all the recipients, delivering a copy of the same to the collaborators, to the members of the institutional bodies (Board of Directors, Founders, Board of Auditors, Local Referents) and to all those who work on behalf of the Foundation. The General Manager is responsible for monitoring compliance with the Code of Ethics, taking initiatives to disseminate it, proposing changes to the Board of Directors and integrating it, receiving reports of violations and reporting them to the administrative bodies. The violation of the



provisions of the Code of Ethics by collaborators, consultants or all other persons connected to the Foundation by a contractual relationship may determine the resolution of the aforementioned relationship. Compliance with the Code of Ethics is one of the contractual obligations of all those who work with the Foundation. In any case, the request for compensation must be paid if the behavior carried out has caused damage to the Foundation.

Art. 11 - Health and Safety at Work

The Foundation pursues with the utmost commitment, the goal of ensuring the health and safety of the workplace. In this regard, the Foundation adopts the measures deemed most appropriate to avoid risks related to the performance of its business and, where this is not possible, for an adequate assessment of existing risks, with the aim of fighting them directly at the source, manage them and, where possible, guarantee their elimination. Occupational Health and Safety within the projects financed by the Foundation is completely under the responsibility of the Local Referents who promote the Project.

Art. 12 - Use of the Foundation's name and reputation

Membership and participation, for any reason, in the Foundation require full institutional loyalty and cannot be used in any way for personal purposes. Any act carried out on behalf of the Foundation or in its interest must in no way damage its image and respectability. All members of the Foundation are obliged to respect their good name and not to damage the reputation of the institution.

Art. 13 - Entry into force, effectiveness and amendments of the Code of Ethics

The text of this Code of Ethics has been adopted by resolution of the Board of Directors of the October on the 19th 2018, and becomes effective by the approval resolution of the Shareholders' Meeting. The Board of Directors is the only competent body for the adoption and modification of the Code of Ethics. Each Member acknowledges and accepts the present Code, expressing the commitment not to hinder in any way the work of the bodies responsible for safeguarding its effectiveness. A copy of the Code is given to all recipients and made available for consultation in electronic format on the site; the translation into English will be taken care of and will be transmitted to local contacts and will be available on the skychildren.org website.

Monza, May 16th 2024

The founding members