

CODE OF CONDUCT

CODGOV01EN

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1. INTRODUCTION

1.1. Aim

The objective of the Code of Conduct is to be an internal guide and an external declaration of Educo's values and commitments and it aims to articulate our mission, values and principles, linking them to the standards of professional conduct that, as an organisation, we wish to encourage and define in order to achieve the behaviour we desire.

1.2. Scope

This Code of Conduct is one of the three rules¹ that stem directly from the Ethical Code, which is one of the main institutional reference points. This document provides the framework for handling daily relationship situations, as well as for making decisions about ethical dilemmas that arise in day-to-day work. It also constitutes the "umbrella" under which institutional policies related to the behaviour expected from Educo team members are set out and developed, as well as all those who come into contact with the organisation.

This document will be shared at all levels and areas of Educo and implemented in a plan which will enable all the people who are part of the organisation, as well as all those that come into contact with it, to get to know it and commit to complying with it.

1.3. Coverage

The principles and rules for conduct contained in this document establish a catalogue or guide for the performance of professional activity, based on the values, mission and vision of the organisation and are applicable to all the geographic areas Educo operates in, as well as all the people who are part of the organisation, from the management levels to the most operational levels, on an employed or voluntary basis, i.e.:

- (a) **Educo Board of Trustees.**
- (b) **Educo staff:** employees, volunteers and trainees, interns and work experience staff.
- (c) **Educo ambassadors**
- (d) **Other people related to Educo,** for example:
 - People who collaborate (child sponsors, donors, supporters).
 - Journalists or other staff from media outlets.
 - Photographers.

¹ The other two documents are the Good Governance Code and the Code of Conduct on Regulatory Compliance.

- People who visit our projects, including anyone who accompanies them.

Similarly, this code must be made known to **suppliers, partner organisations and other bodies that Educo has a relationship with for the development of its activities**, establishing in this way the standards of conduct expected of them as a fundamental condition for the establishment and continuity of their relationship with the organisation.

1.4. Exceptions

No exceptions are applied to this regulatory document.

1.5. Change logs

Version no.	Description of changes	Date of approval
1	Initial version	09/07/2020

1.6. Principles

The Code of Conduct describes, in general, the lines of action that Educo expects of all the people who make up our team, as well as those that the organisation will follow, both at an internal relations level, as well as in its relations with external bodies, including partner organisations, suppliers, local authorities, funders, etc. Every person who works at Educo has an impact both externally, for example, on the organisation's reputation, and internally, in this case, on the organisational culture and the success we achieve. Our conduct and behaviour on a daily basis make up an identity and a culture as an organisation, and contribute to creating the image we have in the world around us. Our ability to achieve these aims, often in complex or unstable circumstances, is linked to our reputation and, specifically, to the level of trust we generate. This depends above all on how each of us defends and promotes the standards of conduct and accepts special responsibility for safeguarding human rights.

While we are aware that local laws and customs may change considerably from one country to another, it is important to make it clear that we are one International Non-Governmental Organisation (INGO) wherever we are present, therefore the Code of Conduct has been drawn up in line with international standards including those of the United Nations (UN), and is subject to international human rights law.

On the other hand, our work requires that we observe the legislation, customs and traditions of the countries we work in, however, in the cases in which these contradict the Convention on the Rights of the Child (CRC) or the Universal Declaration of Human Rights, these must prevail, as it is fundamental that all people at Educo support the concept of human rights in general, and especially those of children and adolescents, through both our words and our actions, and commit ourselves to respecting them in all our decisions and actions. The basis of this commitment begins with an

understanding of organisational values, as well as the principles for humanitarian interventions, which will guide day-to-day decision-making:

Institutional Principles

- **Participation:** All of our actions guarantee and promote the right to participation of children and adolescents, and those that accompany them, to fully exercise their citizenship. Similarly, we promote a participative culture in our organisation.
- **Non-discrimination:** Our work is based on the recognition that all children and adolescents must have the opportunity to enjoy their rights regardless of their national, ethnic or social origins, sex, language, religion, political opinion or financial situation, or whether they possess different abilities, or any other condition of their own or their families.
- **Transparency:** We base our work on honesty, responsibility and maximum access to information about the management of resources and the impact of the actions which we are involved in, as pillars of a social and financial accountability.
- **Dynamism:** We have the ability to adapt and respond in order to act, as well as creativity to innovate in search of the quality of our actions.

Humanitarian Principles


- **Impartiality:** Educo staff members have the right to freedom of opinion and freedom of expression. However, the principle of impartiality must be respected at all times.
- **Independence:** Educo staff members will fulfil their obligations in complete independence of third parties, and in particular of companies and organisations it may have to deal with in the performance of its duties. The behaviour and adoption of decisions by staff must be determined by the need to serve the common good and public interest, to the exclusion of any other interest.
- **Neutrality:** Neutrality is one of the main principles of Educo. In accordance with this, Educo staff members agree not to mention internal situations and aspects, or manifest political, religious, racial, ideological or military opinions in the course of work.
- **Humanity:** Recognising that the principle of humanity governs Educo's work, in accordance, the Educo team is committed to working to alleviate human suffering, with special attention to the most vulnerable.

It is very important to be aware that non-compliance with the Code of Conduct will, in all cases, be followed by a disciplinary measure, which, depending on the level of severity, may range from the most reflexive, to dismissal, and even, in cases where it is warranted, to legal action.

1.7. Responsibilities

BOARD OF TRUSTEES:

- Establish Educo's codes and policies.
- Review and approve updated versions of this regulatory document where appropriate and enable its implementation throughout the organisation.

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HEAD OFFICE MANAGEMENT COMMITTEE:

- Ensure that the responsibilities and competences in the management of this regulatory document are defined, assigned, communicated and complied with at all levels of the organisation.

PEOPLE AND CULTURE DEPARTMENT:

- Review and update this document within the relevant deadlines for subsequent approval and sharing throughout the organisation.

COUNTRY OFFICE MANAGEMENT COMMITTEES:

- Ensure that all the organisation’s staff in the country, as well as suppliers, partners, etc., are aware of and comply with what is established in this document.

COMPLIANCE COMMITTEE:

- Receive, investigate and inform about the notifications and reports received that refer to non-compliance of this regulation.

ALL BODIES AND PEOPLE:

- Be aware of and comply with all the provisions of this regulatory document on a mandatory basis.

1.8. Glossary

- a) **Conduct:** This refers to the way in which an individual or a group of individuals act in relation to other individuals within a society, group or culture. It can be said that behaviour is a conscious activity because the subject is aware of its implications and consequences. It is also observable, i.e. it manifests itself to others, and it is repeatable, since it is permanently or continuously present.
- b) **Behaviour:** This is the way each individual behaves towards others and according to the stimuli he or she receives from their surroundings. Behaviour is influenced by a person's culture, the stimuli received, beliefs and social norms within which the person develops. Behaviour is not necessarily a conscious activity because it refers to actions that a person commits in response to certain stimuli. Behaviour is observable as it manifests itself to others, but not necessarily repeatable, as it may occur only once in a person's lifetime.
- c) **Board of Trustees:** The Board is the governing body of the foundation. Its primary task is the governance and administration of the Foundation, decision-making at the highest institutional, corporate, strategic and programmatic levels, and to set the policies and guidelines of the organisation.
- d) **Management Board:** This is the collegiate management body with executive functions. This body exists both at the Foundation’s Head Office level and in each Country Office. In the case of Head Office, it reports directly to the Executive Director and in the case of the Country Offices, it is led by the Country Director. It is the body responsible for coordinating the operating, development and implementation of the Foundation’s activity.

- e) **Compliance Committee:** This is a collegiate body whose members are appointed directly by the Board of Trustees and whose purpose is to ensure compliance with the Foundation's regulations, and whose functions include receiving, investigating and resolving notifications or reports of non-compliance with the statutes, codes, policies and other institutional regulations.

1.9. Related documents

CODGOV04EN – Ethical Code v2

REGGOV02EN – Regulations for the Whistleblowing Channel v1

FORHRS01EN - Letter of Commitment Format for the Code of Conduct, the Child Safeguarding Policy and the Policy of Protection against Sexual Exploitation, Abuse and Harassment (PPSEAH) v1

2. PLEDGE

As a member of EDUCO, I pledge to:

1. Maintain the integrity and reputation of Educo, guaranteeing that my professional and personal conduct is manifestly consistent with Educo's values and standards, in order to avoid possible conflicts of interest with Educo's work.

+ I will

- I will make an effort to ensure my work is of the highest possible standards.
- I will be responsible for my actions and expressions, and show transparency and honesty at all times.
- I will always act with professionalism, respect and courtesy.
- I will avoid conversations or actions that go against the rights of other people.
- I will be precise and truthful when I describe Educo products and services, and in marketing, promotion, publicity and other materials, both internally and externally.
- I will be honest and communicative and I will never provide false or misleading information.
- I will always keep in mind that there are strict rules against bribery or offers of any value, and that they are illegal.
- I will inform my supervisor and/or the Compliance Committee of any bribery request within the established deadlines.

X I will not

- I will not abuse my position of power as a representative of Educo to favour me, benefit me or create special conditions for me or others, or to cause any kind of harm or damage to third parties.
- I will not behave in any way which will impair my ability to do my job or that could tarnish Educo.
- I will not drink alcohol or consume other substances which affect my ability to carry out my role or affect Educo's reputation.
- I will not provide alcohol or harmful substances to children, adolescents or any adult participating in our projects.
- I will not be in possession of or benefit from the sale of goods or illegal substances.
- I will not ask for, or invite, any payment, service or personal favour from others, and in particular from the people we assist, in return for our help, support, goods or services of any kind.

- I will not offer, promise, pay or authorise the payment of any bribes. I will not offer anything of value in exchange for any benefit or inappropriate advantage.
- I will not tolerate actions or comments which interfere with the performance of someone's work or create a work environment which is intimidatory or hostile.
- I will not make promises that neither Educo or I can fulfil.

2. Treat all people with respect and dignity and question any kind of harassment, discrimination, intimidation, exploitation or abuse.

+ I will

- I will respect the rights of all human beings, especially those of children and adolescents.
- I will abide by the relevant local laws in the jurisdiction I work in.
- I will respect the right to privacy of all people, both those we attend to, and those we work with.
- I will respect others during my normal working hours and outside them, regardless of their gender, age, disability status, ethnicity, sexual orientation, religion, caste, language, health condition or any other aspect of identity.
- I will be careful to ensure that my dress, language and behaviour take into account the religious beliefs, customs, rules, practices and habits of the people of the country or context in which I find myself.
- I will create a safe space for children and adolescents, as well as any person we are trying to help, including vulnerable adults, to prevent them from suffering any kind of abuse or harm, including physical, sexual, emotional abuse, or negligence.
- I will plan activities which involve children, adolescents or vulnerable adults following the protocols included in the Educo Child Safeguarding Policy.
- I will keep my colleagues informed about where I am and what I do when I am working with children, adolescents and the people we assist.
- I will only take photographs or record images or audios of activities with children or adolescents with the corresponding authorisation from Educo and permission from their legal guardians.
- I will treat with respect and dignity all the people we serve, whether they are children, adolescents or adults, and provide them with support and help according to their needs.
- I will provide space and opportunity so that children and adolescents and the adults we support can present and communicate their concerns.
- I will assist all the informative and training sessions related to Educo policies and procedures that are reported to me as mandatory and I will comply with them.

- I will help everyone who works for or represents Educo to be coherent and understand the Educo Code of Conduct and expected behaviour.

X I will not

- I will not take part in any kind of discrimination, harassment, stalking, humiliating behaviour or abuse (physical, sexual, emotional or verbal), intimidation or exploitation.
- I will not exchange money, employment, goods or services for sexual favours or participate in any form of sexual exploitation or prostitution.
- I will not look at, download, create or distribute inappropriate material, like pornography, on Educo IT equipment, including those that are my personal property.
- I will not participate in personal relationships that could be considered an abuse of trust, for example, participating in a sexual relationship with members of the family of someone we assist.
- I will not participate in any harmful traditional practices, like female genital mutilation or forced marriage.
- I will not discriminate against or use discriminatory language in relation to sexual orientation, gender, age, physical appearance, ethnical origin, disability, social class, marital status or religion.
- I will refrain from any conduct that I know or should know to be inappropriate, especially in the particular context I am in.
- I will not demonstrate favouritism towards any person, including giving personal gifts to the people we assist.
- I will not act in a way that does not comply with the Child Safeguarding Policy or generate a dangerous situation for children and/or adolescents.
- I will not participate in any form of sexual activity with anyone under the age of 18, regardless of the age of consent or local customs.
- I will not employ people under 18 as domestic workers.
- I will not downplay the abuse of children or the exploitation and harassment of adults.
- I will not take photographs, film or record audio of children while I am working, regardless of the means used, if I do not have the relevant permissions.
- I will not harm or threaten physically, sexually or emotionally any child or adolescent or vulnerable adult or anyone who is a part of our projects.
- I will not send private messages to children, adolescents or any other person we support or have met through Educo, by any means, unless I am part of their community and am communicating with members of my family or friends.

- I will not withhold information about ongoing criminal convictions, indictments or civil proceedings initiated before or during my recruitment process at Educo, primarily those related to the children and communities we work with, or the abuse of anyone we are trying to help, or that may be relevant to the performance of my duties.
- I will not contact the complainant or witnesses, or interfere in any way with the proceedings of any investigation into possible non-compliance with institutional policies.

3. Be responsible for the use of the information, equipment, money and resources I have access to as a result of my employment relationship with Educo.

+ I will

- I will manage the resources entrusted to me as part of my relationship with Educo (financial, material, etc.) with care and responsibility, ensuring that they are not used incorrectly and are protected from theft, fraud or damage.
- I will declare any conflict of interest related to recruitment of staff and processes of procurement of goods and services and will refuse to participate in them.
- I will report any situation I know about related to the receipt of funds or donations from organisations, bodies, private donors or any other source, whose characteristics may be in conflict with the law and/or our mission, vision and values.
- I will report any incident or concern related to the inadequate use or bad management of Educo's goods and resources.
- I will only accept gifts when these are small offers to show appreciation given by the communities or members of the communities we work with, and when they are given publicly as part of a work activity.

X I will not

- I will not give third parties private and/or confidential information from Educo unless there is a contract that justifies it, or by legal requirement.
- I will not use applications and corporate information for personal purposes or in ways that could harm the rights and interests of Educo and/or its reputation.
- I will not solicit or accept gifts or entertainment of any kind from donors, partners, suppliers or counterparts, whether potential or actual, that may compromise or appear to compromise my professional judgement or the image of Educo.
- I will not provide gifts or entertainment of any kind to donors, partners, suppliers, counterparts or any other actors related to Educo's work, whether potential or current, that could compromise or appear to compromise my professional judgment or the image of Educo.

- I will not enter into any kind of employment or commercial relationship on behalf of Educo with family members, friendships or other personal or professional contacts to provide goods or services to the organisation or any other issue related to employment.
- I will not participate in any financial transaction (personal or using Educo funds) or in activities that support organisations involved in illegal activities.
- I will not use funds or property, my own or those belonging to Educo, for terrorist purposes.
- I will not enter into unfair competition with other entities, organisations or companies, offering services or products at a price below the market value.

4. Protect the health, security and wellbeing of Educo employees, volunteers and external workers, as well as promoting human rights, protecting the environment and opposing criminal or unethical activities.

+ I will

- I will be totally consistent and will comply with Educo policies and local health and safety practices, and will inform management of any area of concern.
- I will ensure that my standards of conduct are framed within what established in this code.
- I will follow all of the security protocols applicable to my individual actions in the area I carry out my work activities in.
- I will report any incidents or concerns related to health, security and wellbeing that occur in my work activities, whether or not they result in physical or psychological harm to myself or others, with the aim of preventing accidents from occurring.
- I will report any violent behaviour or threats of violence I know about, as soon as possible, whether the behaviour has been directed at me or any other person.
- I will care for the wellbeing and health of my colleagues and raise any concerns I may have regarding this issue.
- I will work actively to create a safe work environment free from any kind of harassment, bullying or intimidation, for all Educo employees, volunteers and external workers, whatever their role may be.
- I will always try to resolve conflicts, whether with my co-workers, the participating population or any other party, through dialogue and consensus, and I will avoid engaging in any kind of violent behaviour.
- In my actions, I will identify risks to the environment and implement mitigation measures for them.

X I will not

- I will not behave in a way that causes discomfort or harm to myself or any other person.
- I will not take unnecessary risks that could result in harm of any kind to myself or others.

- I will not have any connection with terrorist activities or prohibited organisations.
- I will not bring arms of any kind to the workplace.
- I will not engage in any violent activity that may endanger my safety or the safety of others.

5. Report any incident or concern which is related to or could be related to non-compliance with the Code of Conduct.

- I am convinced that my actions and decisions are important and as well as complying with my employment responsibilities, I will ask myself these questions when I am faced with a situation which I am not sure is aligned with what Educo allows and accepts:
 - ✓ Is this action legal?
 - ✓ Is this action consistent with the Educo Code of Conduct and Educo policies?
 - ✓ Is this action correct?
 - ✓ What would people external to Educo think of this action?
- If I am unsure how to answer these questions, or if the answer is negative, it is my responsibility to seek guidance from my supervisor or other experts in the field and raise this concern.
- I will consult on any concerns I may have about the appropriateness of the conduct of people related to Educo or the way we operate as an organisation.
- I will report any incident or concern regarding non-compliance or potential non-compliance with this code or any applicable institutional policy using established channels and within established timeframes.

3. IMPLEMENTATION AND MONITORING

As this document is compulsory for all people who are part of Educo, as well as all those people and/or bodies who establish a relationship with the organisation, it is fundamental that its existence and content be shared throughout all levels of the institutional structure. On the other hand, it is also very important that the population participating in projects and programs implemented by Educo and its local partner organisations is aware of the existence of this document and has access to it so that it can serve as an authority for social control and, in turn, for identifying and reporting any act of non-compliance with this Code of Conduct.

It is for this purpose that the final approved version, formatted and translated into the three official languages the organisation works with (Spanish, English and French) will be officially sent to all heads of area at Head Office, as well as to all country directors, together with an implementation plan, to ensure that all staff under their responsibility are aware of and understand the content of the document. It will also be uploaded to the Extranet, in the relevant place, so that all external staff can have access to the document when they require it.

As proof of understanding and commitment to the Code of Conduct, as well as to the Child Safeguarding Policy (CSP) and the Policy for Protection against Sexual Exploitation, Abuse and Harassment (PPSEAH), it will be requested that a single letter of commitment to these three normative documents be included as part of the processes for recruiting staff, acquiring goods and services, and signing agreements with local partner organisations.

Each Country Office will be asked to develop a strategy for the dissemination and knowledge of the Code of Conduct among the population participating in programmes and projects, as well as the WhistleB mechanism, which is the global channel for complaints about non-compliance with this normative document². The Country Offices will be encouraged to develop and implement, in the different territories we work in, mechanisms for reporting that are contextualised and accessible for the participants in our projects and programs.

The monitoring and implementation of the Code of Conduct globally is carried out by the Global Safeguarding Commission, and in each country, by the Safeguarding Committee for each Country Office.

² Everything about how to file a complaint using WhistleB is included in the Regulations for the Whistleblowing Channel.