

**Agency for Peacebuilding
Code of conduct
Version 1 (11 July 2023)**

The Agency for Peacebuilding (AP) strives for the highest standards of ethical and professional behaviour. We are committed to act at all times in a manner consistent with our organisation's values, as well as the laws of Italy, where AP is registered, and with the relevant laws of the jurisdictions where we work. The Code of Conduct ("Code") applies to all employees, consultants, interns, and volunteers acting on behalf of AP (referred to herein as "affiliates"). AP affiliates must adhere to this Code, and they are expected to perform their duties in good faith, with honesty and integrity, and in furtherance of the mission, goals, and values of our organisation. Any affiliate who violates this Code will be subject to appropriate corrective action, ranging from a disciplinary warning to the termination of their collaboration. AP may take the required corrective action necessary to prevent inappropriate affiliate behaviour before such behaviour reaches the level of legally actionable behaviour. Affiliates found to have violated the Code of Conduct, and if such violation resulted in dismissal, will not be eligible for rehire by the organisation.

The Code of Conduct was approved in its current form by AP's Steering Committee on July 11, 2023. The Steering Committee might make changes to this version should any article within it required further elaboration or clarification. Changes might also be made as a result of feedback from AP's members.

1. Professional Responsibilities

All affiliates are expected to conduct their duties and responsibilities in a professional and ethical manner. Affiliates are responsible for complying with all organisational policies, with relevant laws in Italy (where the organisation is based), and with all applicable legal obligations in third countries (for affiliates based in other countries, or when affiliates are asked to travel for work). Affiliates must hold themselves accountable for all actions and behaviours while conducting their duties and responsibilities with AP. Affiliates are expected to perform their duties and assignments in a competent manner, behaving always in an ethical, sensitive and aware manner, and use AP resources responsibly. Employees are also accountable for attending required meetings, and maintaining the appropriate professional qualifications for their work, including the renewal of any required certification(s).

2. AP's principles

AP works on the basis of eight guiding principles, which all affiliates must abide by throughout their collaboration with AP:

- the use of civil capacities and tools;

- the primacy and leadership of individuals and groups who are directly affected by violent conflict;
- reciprocity as a precondition for establishing relationships that are truly equal between individuals, communities and agencies that are engaged in finding solutions to conflict;
- an appreciation of the diversity that exists among people, communities and institutions;
- a peacebuilding approach that is both process and results-oriented;
- a peacebuilding approach that is open to honest exchange and genuine debate;
- a peacebuilding approach that is open to innovation and creativity.

3. Policy against discrimination, bullying, and harassment

AP affiliates should not engage in discrimination, bullying, or harassment. AP has zero tolerance for sexual misconduct, including sexual harassment, exploitation, or abuse of any kind.

3.1 Non-discrimination

Discrimination is treating or proposing to treat an individual or group unfavourably, unfairly, or unequally based on race, colour, national origin, sex, religion or belief, age, physical or mental abilities, marital status, sexual orientation, gender identity or expression, pregnancy, military or veteran status, citizenship status, being a victim of domestic violence or assault, or any other characteristic or status protected by law. AP does not tolerate discrimination on any protected characteristic or status by affiliates against other affiliates, or by affiliates against participants in, and beneficiaries of, events and activities implemented by the organisation.

3.2 Anti-bullying and anti-harassment

Bullying includes, but is not limited to, offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient. In general terms, workplace harassment is unwanted conduct, where a person is subjected to behaviour that is repeated, unwelcome, and unsolicited; the person considers it to be offensive, intimidating, humiliating, or threatening; and/ or a reasonable person would consider it to be offensive, humiliating, intimidating, or threatening. Workplace harassment and bullying can be committed by an employer, worker, co-worker, group of co-workers, partner, supplier, or donor.

Workplace harassment covers a wide range of behaviours and can include unwelcome physical, verbal, or non-verbal conduct. Some examples include:

- Making/ sending offensive messages (e.g., via email, telephone or other means);
- Racist, sexist or sectarian remarks including family, sexuality, gender identity, culture, education, physical or mental ability;

- Psychological harassment such as isolating or spying on a person;
- Use of offensive language, gossip, and slander;
- Displaying images, graffiti, flags, emblems, or any other offensive material and visual displays on posters or computer screensavers;
- Significantly impairing the person's work in any way such as inappropriately withholding information or removing content;
- Humiliating a person through gestures, sarcasm, and insults (especially in front of others);
- Physically harming a person in the workplace such as pushing, shoving, tripping, or grabbing;
- Any form of attack causing or intending bodily harm, or any threat thereof.

3.3 Sexual Harassment

Sexual Harassment is a specific and serious form of harassment. Sexual harassment is defined as unwanted sexual advances, requests for sexual favours, sexually motivated physical contact, and gender or sex-related conduct or communication when, for example (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment. Sexual harassment can be directed towards one person, groups of people, or towards everyone and can occur as a one-off incident or be a pattern of harmful behaviour. It makes no difference if the victim of the sexual harassment is of the same or opposite sex as the harasser. The effect of sexual harassment is to violate the dignity of another person and to create an intimidating, hostile, degrading, humiliating, or offensive environment for them and others.

Sexual harassment can take many forms, including but not limited to:

- Verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life or offensive jokes, discussion of sexual activities, requests or demands for sex or sexual favours, sexual epithets, gossip, or comments;
- Non-verbal activities such as displaying pornographic or explicit images in the workplace or on one's computer, unwelcome leering, whistling, sexual gestures or written comments of a sexual nature which are offensive or inappropriate, sexually explicit voicemails, texts, or emails;
- Physical actions such as unwanted physical contact, touching, making unwelcome sexual advances, making reprisals, threats of reprisal, or implied threats of reprisal following a rejection of a sexual advance, and assault (this includes attempts and threats to do these things).

In defining sexual harassment what matters is not whether statement or conduct is without explicit sexual meaning or overtones: it only matters that the statement or conduct is unwelcome and that it has a discriminatory meaning or implication. Just because someone does not object to inappropriate behaviour in the workplace at the time, it does not mean that they are consenting to the behaviour.

When addressing allegations of sexual harassment, AP is concerned with the impact of the behaviours on the complainant, not the intention of the person doing it. Sexual harassment does not generally include occasional compliments of a socially acceptable nature, and which are culturally sensitive and aware. It also does not include consensual relationships as long as there is not a direct reporting relationship or a relationship between a supervisory employee and a non-supervisory employee. Commonly accepted fraternization among employees, defined as conduct of a socially acceptable, friendly, and congenial nature that adds to team building or a pleasant work environment is not considered sexual harassment.

4. Prevention of Sexual Exploitation and Abuse (PSEA)

AP is committed to protecting the safety and well-being of those who decide to participate in events and activities organised by the organisation, particularly women, vulnerable adults, and children. AP maintains zero tolerance for sexual abuse, child abuse, and exploitative acts by our affiliates or anyone associated with the delivery of events, activities or services and takes seriously all complaints of misconduct brought to our attention. The protections defined by the Code of Conduct should extend from AP's staff and affiliates to the people and communities we work with and for. Staff are obliged to create and maintain an environment that prevents sexual exploitation and abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

AP strictly prohibits all affiliates from engaging in sexual exploitation targeting other affiliates. AP strictly prohibits all affiliates from engaging in any form of sexual exploitation targeting participants in events and activities organised by the organisation.

AP strictly prohibits all affiliates from buying sex.

AP has a zero-tolerance policy with respect to trafficking of persons.

5. Child Safeguarding

Child safeguarding is to protect anyone under 18 years of age from harm resulting from maltreatment, whether it is physical, verbal, sexual, emotional or psychological or as a result of neglect. AP is committed to providing a safe environment for children by holding all affiliates to high standards of conduct and implementing policies and procedures to prevent and respond to instances of child abuse, exploitation, or neglect. AP strictly prohibits all affiliates from engaging in sexual relationships or any other kind of inappropriate physical or sexual behaviour with a child, regardless of country specific age of consent.

Affiliates must comply with the following standards regarding conduct with children:

- AP expects all affiliates to treat all children with respect regardless of their race, colour, gender, language, religion, opinions, nationality, ethnicity, social origin, property, mental or physical abilities, or other status;
- AP affiliates must comply fully with host country and local child welfare and protection laws including those in relation to child labour or with international standards, whichever gives greater protection;
- AP must comply with the International Convention on the Rights of a Child;
- Affiliates must always consider the risk of harm and whether there is any possibility a child may be abused or exploited when assessing the appropriateness of any physical or verbal contact, including in the design of AP's interventions;
- Affiliates are additionally required to disclose any convictions or child-related investigations to which they are subject.

6. Communication and political activities

Affiliates should obtain permission from their supervisors before publishing work written on behalf of AP or as a representative of AP. All AP's employees and advisors are expected to communicate in a respectful way, expressing a common ground viewpoint which is consistent with the organisation's mission and values. If a common ground viewpoint has not been defined by the organisation, affiliates should make sure that the different perspectives on the issue are acknowledged and represented in a balanced and culturally sensitive way.

This Code of Conduct also applies to communication through social media. Affiliates who post about AP through a personal social media account should identify their connection to the organisation and conduct themselves in a manner consistent with AP's values.

The work AP does is possible because it maintains an impartial position in relation to the conflicts in which it works, and because it respects the human dignity of all those it works with. This notwithstanding, AP is always open to, and respectful of, the political opinions and views of its affiliates, and welcomes their political engagement where this comes from a belief that it will lead to positive change. At the same time, it is important that affiliates do not interact with participants in AP's interventions in a way that is contrary to the stated mission of the organisation, especially when acting on AP's behalf. This extends to the use of online social media. No AP funds, property, assets, services or facilities may be used, directly or indirectly, to participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office, or contributed to or used by any political party, campaign, political action committee or public office-holder. Affiliates should always clarify that their political opinions are theirs alone and that they do not reflect those of the organisation.

7. Use and protection of property and information

It is the responsibility of all affiliates to use AP resources in an appropriate and responsible manner. Resources, both tangible and intangible, are only to be used by authorised personnel for designated, work-related purposes. Such resources include, but are not limited to, electronic devices, monetary funds, Internet access, and databases.

When using any organisational funds, affiliates must avoid purchasing any unnecessary or unreasonable items. Except for limited use for essential personal communications, AP's property, facilities and physical resources, including computers, phones and fax machines, may not be used for any non-AP business. Any employee found to be engaging in or attempting theft or other improper use or diversion of AP property, including funds, credit or debit cards, bank accounts, documents, equipment, intellectual property, personal property of other employees, or any other items of value, will be subject to immediate discharge and possible criminal proceedings. Employees have a responsibility to report any such activities to AP's Steering Committee.

The collection, use and management of personal information within AP's programmes should always comply with the EU's General Data Protection Regulation (GDPR). Whenever information is collected, affiliates should make clear why it is being collected, who it will be shared with and how long it will be managed by the organisation. All those contributing information to the organisation have the right to ask that their information be kept confidential; they also have the right to ask that the information collected from them is deleted, as long as this does not contravene other agreements between AP and affiliates, or between AP and third parties.

AP works in an open and collaborative manner and as such, affiliates may have access to internal information of a confidential, sensitive or proprietary nature. Dissemination of such information should be limited to those affiliates properly and directly involved in work or deliberations relating to the information itself. Confidential, sensitive and proprietary information includes: proposals, budgets, marketing plans, costs and other internal financial data, personal data (of affiliates, participants to events and activities, and beneficiaries) and similar information. It is a requirement of working with AP that affiliates maintain confidentiality both internally and externally.

Those affiliates whose job responsibilities entail regular or frequent access to sensitive, confidential or proprietary information concerning AP employees (such as personnel records and employee compensation), accounting and finances, confidential communications, passwords and other information intended for limited internal access or distribution are expected to be especially vigilant in maintaining the strict confidentiality of this information and be diligent in ensuring compliance with relevant privacy laws and regulations. Affiliates who leave AP are required to return all documents (including any hard copies or electronic versions) that contain confidential, sensitive or proprietary information.

Affiliates must follow legal and organisational procedures by appropriately documenting and recording organisational information. Information must be documented and/ or recorded truthfully and accurately in accordance with regulations and organisational policies. When preparing reports, budgets, statements, invoices, time sheets or other documentation for government bodies, donors, or contracting agencies, employees must see to it that information provided is accurate, complete, clear, and presented in a manner designed to enlighten and not to mislead. Under no circumstances may an affiliate make a claim for payment for amounts not properly due to AP for work performed or goods or services provided, or any other false statement, representation or certification on behalf of AP, in either written or oral form.

AP employees responsible for financial and/or personnel recordkeeping must see to it that such records are developed and maintained carefully and accurately in accordance with all applicable legal requirements and AP procedures, and that AP funds are scrupulously expended and accounted for. Access to such records should be limited to those employees who require it to carry out their job responsibilities.

8. Conflict of interest

Affiliates should avoid situations in which their personal financial or other interests could conflict with, or even appear to conflict with, the interests of AP or their responsibilities to perform the tasks assigned to them fairly, impartially, and in compliance with this Code. Conflicts of interest arise when an individual's position or responsibilities at AP present an opportunity for personal gain or profit for that individual or someone they are close with, or where the employee's interests are otherwise inconsistent with those of AP.

Any affiliate who is aware of a conflict of interest, is concerned that a conflict might develop, or has questions about this policy or whether a particular situation would be a conflict of interest, is required to discuss the matter with AP's Steering Committee.

9. Mental health, well-being and safety in the workplace

AP believes that the mental health and well-being of all affiliates is key to organisational success and sustainability. Furthermore, AP believes that mental health and well-being are key to the effective engagement of participants to our events and activities, and of beneficiaries. As such, AP promotes the creation and maintenance of workspaces and worksites that are welcoming and flexible, and can respond to the specific demands of all affiliates. This includes a strong emphasis on flexible (and smart) working arrangements and a commitment to letting affiliates decide how to execute the tasks and responsibilities assigned to them. Ensuring mental health and well-being also includes ensuring open, active

and non-judgemental two-way communication between staff members and their direct supervisors.

Furthermore, AP acknowledges the high costs that mental and physical stress can have on individuals' well-being, and the consequences that this can have also on teams. For this reason, and within the standards set in this Code, all affiliates are invited to report, to each other and/ or their supervisors, whenever their assigned workload becomes unmanageable because of accumulated stress or stress induced by particularly difficult or traumatic events. In the face of such situations, AP will always be committed to providing affiliates with all possible relief, within the means available and the prior commitments made by the organisation. In general, AP as an organisation is also committed to lifelong and on the job learning, and will use all available resources to provide opportunities for its staff and affiliates to grow their skills and knowledge in matters related to the organisation's work.

Acts or threats of violence by affiliates will not be tolerated. Any instances of violence or threats of violence, in any form, including threats to do bodily harm or property damage, directed in any way towards another affiliate or a participant in an event or activity organised by AP must be reported immediately to AP's Steering Committee. Reporting to work under the influence of illegal drugs (including misuse of prescription medication) or alcohol is strictly prohibited. Possession, use, or sale of illegal drugs while on (or off) the job, including rest and meal periods, is a dischargeable offence, and may result in criminal prosecution.

AP maintains safe workplaces and worksites, both in presence and online. AP has an obligation under Italian law to provide safe and healthy working conditions. These obligations are equally valid when affiliates travel on official business. When doing so, affiliates are requested to have individual travel insurance, which will either be covered or reimbursed by AP. Travel to potentially dangerous locations should happen only with the consent of affiliates and following an assessment of the security situation of the destination location to be done by AP's Steering Committee or by a staff member mandated by the Committee.

10. Operational sustainability and care for the environment

Aware of the times we live in, AP is committed to ensuring the maximum level of sustainability within its operations and to promoting care for the environment among its affiliates, among the participants to the events and activities that it organises, and also among its beneficiaries.

Every project, operation or activity will as part of its management routines consider its impact on the environment and communities. These management routines must be set up to be cost effective and sustainable. They affect primarily transport, event management and office management.

In relation to transport, air travel is the world's fastest growing source of greenhouse gases such as carbon dioxide, which causes climate change. However, given the nature of AP's work and its collaborations, air travel also remains one of the main means to pursue the organisation's mission. This said, AP is committed to limiting air travel to what is strictly necessary: this means seeking alternative solutions to air travel (including long-haul train routes or online solutions) whenever appropriate. In relation to land travel, AP is committed to providing affiliates with the support to travel using the most sustainable solutions. Flexible (and smart) working should also be considered together with in-office working in order to minimise the use of fuel-based, private vehicles.

In events organised by AP, staff and affiliates will always give preference, within available resources, to the most sustainable options, in particular avoiding using solutions known to generate excessive waste, or that do not allow for the recycling of goods. The management routines in relation to event planning must consider the impact on the environment, whether this comes in the form of the transport required for participants to get to and from the event, or the effects that the event might have on the environment.

Lastly, in managing its physical spaces, AP's staff and affiliates must pay attention to the sustainable use of resources, and in particular to the responsible use of energy (gas and electricity), and the provision of environmental-friendly goods and services.

11. Reporting and investigations of violations to the Code

Affiliates who become aware of any suspected, planned, or actual violation of this Code should immediately report this to her/ his supervisor, or to AP's Steering Committee. Affiliates are then expected to cooperate fully with any investigation by AP, or a governmental authority into a possible violation.

If an employee is uncomfortable reporting an activity they believe to be improper through internal AP channels, or is not satisfied with the response received, such activity may be reported on a confidential basis or submitted anonymously. Sensitivity to confidentiality is a priority, and every effort will be made to protect an affiliate's identity (if they wish) when reporting an issue. However, in some cases, it may be impossible to protect someone's privacy due to demands of conducting an investigation or certain legal requirements. Affiliates should never hesitate to ask a question or report a concern.

Any affiliate who becomes aware of any inappropriate conduct, including sexual or other prohibited harassment, sexual exploitation or abuse, whether affecting themselves or others, has an obligation to report the matter immediately to her/ his supervisor, or to AP's Steering Committee. Any supervisor or manager who receives a complaint of possible sexual or other prohibited harassment, exploitation, or abuse should promptly contact AP's Steering Committee. All complaints of sexual or other prohibited harassment will be investigated



promptly and thoroughly. No affiliate will suffer retaliation for reports of harassment if made in good faith.

11. Waivers, Amendment

AP is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code of Conduct is subject to modification. Any amendment or waiver of any provision of this Code of Conduct must be approved by AP's Steering Committee.