Fundacja Jedność (NGO Unity) Code of Conduct

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Letter from the founders of the NGO JEDNOŚĆ (UNITY)

Dear Colleagues!

We founded this organization when we came to Poland from Ukraine in 2022 for the purpose of creating a common and worthy future.

The main project is a multicultural educational center, which aims:

- Upbringing of a new happy generation capable of realizing its potential for the benefit of society.
- To promote integration of cultures for the sake of creating a worthy future.
- To unite conscious Ukrainians for creation of their worthy future in new living conditions for them and their children.

We are hiring and inviting like-minded people who are ready for self-development and professional growth.

Sincerely yours,

Jedność founders

Olena Koltunovych and Olena Postolnyk

Introduction

In keeping with its vision and values, NGO Jedność is committed to maintaining the highest degree of ethical conduct amongst all its staff and associated personnel. To help increase understanding, this Code of Conduct details NGO's values and expectations of employees in key areas.

Scope and purpose

This Code of Conduct applies to all contracted staff, international and local, employed by Jedność as well as volunteers. It also applies to partners, contractors and suppliers when they do not have a COC or when their COC is insufficient

The purpose of this Code of Conduct is to set out the conduct expected of NGO Jedność staff whilst under contract to the organization, and forms part of all contracts of employment. The Code is applicable at all times. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including dismissal.

The Code of Conduct is developed from international and UN standards. NGO Jedność staff are expected to uphold local law wherever they operate.

Mission

Mission of the foundation is creating the foundation for a happy future society without wars, discrimination and meaningless living. We believe in the genius of every child. We know how to create an environment in which, in partnership with parents, a young child develops into a worthy individual, capable of intelligent and systematic thought, ethically mature, and positively influencing society.

Objectives of Jedność foundation:

- 1. To educate a new happy generation capable of realizing its potential for the benefit of society.
- 2. To promote the integration of cultures for the sake of a worthy future.
- 3. To unite conscious Ukrainians for creation of their worthy future in new living conditions for them and their children.

The mission specified in such objectives concerning to Statute of the Foundation:

- Spreading the idea of learning-based education and development, in a community of equal rights and mutual respect.
- 2. Introduction and dissemination of knowledge of modern, innovative, alternative and pro-social methods of education.
- 3. To promote creativity, entrepreneurship and cultural activities linked to education and personal development

- 4. To promote good practices in the field of science, education
- 5. Supporting the comprehensive development of children, adolescents and adults in the effectiveness of learning, acquisition and development of skills, conflict resolution, negotiation and other skills in the field of social communication.
- 6. Promoting activities for self-development.
- 7. Activities in favor of national and ethnic minorities and regional languages
- 8. Activities for the integration of foreigners.
- 9. Establishment of international relations with civic organizations, whose goal is the development of the person, family and society.
- 10. Supporting the creation of a humanistic society.
- 11. Supporting the implementation of the principles of humanistic pedagogy in the process of education.
- 12. Activities in favor of family, maternity, parenthood, dissemination and protection of children's rights.
- 13. Promotion of culture and maintenance of Ukrainian identity.

Values

NGO Jedność based on such values:

- Humane environment: we create a space where everyone is respected and valued, where freedom of expression is encouraged but not permissiveness, and where a noble personality is formed;
- Respect for the individual: we strive to see everyone's potential and help them discover and fulfill it;
- Discovering Your Brilliance: we create an educational environment where a person gets to know himself or herself and discover his or her destiny;
- Morality: we are guided by ethical principles and align our decisions and actions with them;
- The idea of the common good: we support the ethical maturation of the individual; we inspire the discovery of the idea that makes you free;

- Think globally act locally: we make decisions here and now, guided by a strategic vision of the situation;
- Reviving the tradition of patronage: we create and develop public systems to support culture, education and society's contribution to the future of the country by attracting financial grants for the development of talented youth and children;
- Development of an integral personality: we help people become aware of themselves, their core values and get to know the world with all its interconnections as an integral system; find their place in the world, develop their talents in order to fulfill their destiny;
- Pro-activity: we strive to have a positive impact on society and conduct evolutionary changes in the sphere of culture and education;
- Systemic: we develop the ability to think, to order time, space and events, to see and create relationships between the individual elements, as well as the ability to approach any problem in a comprehensive way.

Guiding Principles

- Humanity human suffering must be addressed wherever it is found, with particular attention to the most vulnerable. Any action is taken with the purpose of: protecting life and health of the person, preventing or reducing harm and ensuring dignity.
- Dignity and Respect. All actions taken should be guided by respect for the dignity, choices, wishes, needs, rights, culture and values of the victim/survivor, and consider their informed choices as a central priority. Treat beneficiaries and colleagues with courtesy, empathy, and professionalism.
- Non-discrimination and Inclusion. Beneficiaries and colleagues should receive equal and fair treatment. Be gender responsive and inclusive. Do not discriminate on the basis of race, color, sex, gender identity and sexual

orientation, ethnicity, age, language, religion, belief, political or other opinion, national or social origin, disability, property, birth or other status. Acknowledge intersectional discrimination and be aware of personal bias.

4. Core Principles Relating to Sexual Exploitation and Abuse.

https://reliefweb.int/report/world/iasc-six-core-principles-relating-sexual-ex

5. Children's protection is measures and structures to prevent and respond to abuse, neglect, exploitation and violence affecting children. Child protection means safeguarding children from harm. Harm includes violence, abuse, exploitation and neglect. The goal of child protection is to promote, protect and fulfill children's rights to protection from abuse, neglect, exploitation and violence as expressed in the UN Convention on the Rights of the Child (UNCRC)) and other human rights, humanitarian and refugee treaties and conventions, as well as national laws.

There is information about children's protection in different fields (definitions, tools for protection) via this link

https://www.unicef.org/protection/strengthening-child-protection-systems

- 6. Survivor-centered approach seeks to empower survivors by prioritizing their rights, safety, well-being, needs and wishes. Organizations must ensure that survivors have access to appropriate, accessible and good quality services. Definition and Principles of a Victim/Survivor Centered Approach via link https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/iasc-definition-principles-victims urvivor-centered-approach
- 7. Observance and support rights of employees, concern to International law and national legal system.

Forbidden actions by Jedność foundation staff members towards beneficiaries:

 discrimination based on looks, ethnicity, religion, beliefs, sexual orientation

- any actions that can be considered humiliating towards the beneficiaries or can be considered acts of emotional, sexual or physical abuse
- use of emotional of physical violence to discipline children or adults eg.
 screaming, blackmail, threats, humiliating, insulting.
- inappropriate physical contact with a child or adult violating a person's dignity
- serving alcohol or psychoactive substances to beneficiaries
- provocative sexual behavior towards beneficiaries
- sexual relations with beneficiaries adults and children
- lack of immediate response to violence against beneficiaries by third parties (including other staff members, other beneficiaries other people involved in assisting the beneficiary)
- ignoring information regarding abuse
- abusing the position of power and the vulnerability of the beneficiaries.

Help provided to beneficiaries is documented. The Association follows the rules of image and data protection, including sensitive data, by:

- obtaining written consent to personal data management and photos.
- assigning people responsible for data protection.
- staff trainings
- ensuring safety of paper and electronic documents
- setting clear policy on data sharing for collaborating institutions eg. courts
- The Foundation does not share information about beneficiaries in the media without beneficiaries consent and custodial agreement for children.

Rules all staff of Jedność commits to uphold:

- 1) I will uphold humanitarian values and the integrity and reputation of the program by ensuring that my professional and personal conduct is consistent with all humanitarian standards.
- 2) I will treat all people fairly with respect and dignity and without discrimination.

- 3) I will follow the rule of law.
- 4) I will seek to ensure that my conduct does not bring the program, my organization or its partners into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed.
- 5) I will not physically, emotionally, or sexually abuse any child or adult or neglect any child.
- 6) I will not exchange or attempt to exchange money, employment, goods services, or any form of assistance for sex, sexual favors or romantic relationships.
- 7) I will not engage in sexual or romantic relationships with program participants that could potentially involve improper use or rank or position of power.
- 8) I will not engage in sexual or romantic relationships with program participants that involve a perceived or real conflict of interest.
- 9) I will immediately disclose any sexual or romantic relationship with a program participant that I am engaged in or have intent to engage in.
- 10)I will not engage in sexual activity with children (persons under the age of 18) regardless of the legal age of consent in the country. I understand that mistaken belief in the age of a child is not a defense.
- 11) I will not engage in any activities that exploit children or vulnerable adults, including any activities in which I am complicit or otherwise benefit from a practice that constitutes or contributes to human trafficking.
- 12)I will not engage in procuring child labor including the hiring of children for any form of labor (including as "house help") which is inappropriate given their age or developmental stage, or any work that is mentally, physically, socially or morally dangerous and harmful to children, that interferes with their schooling, or that is otherwise illegal under national laws.
- 13)I will not sexually harass or assault any team member of my organization, my Foundation's partners and collaborators or any beneficiaries.
- 14)I will immediately disclose any sexual or romantic relationship I am in or may become engaged in that involves someone in my reporting line.
- 15)I will always seek to create and maintain an environment which is free of any form of exploitation, abuse or harassment.

- 16)I will immediately report any breaches of this code of conduct via my organization's internal reporting channels. I understand that I have the right to report anonymously and that anyone who reports in good faith should not be subject to any form of retaliation for reporting.
- 17)I will not knowingly report any false information. I understand that knowingly reporting false information is considered a breach of this Code of Conduct.
- 18)I will prioritize the safety, protection and wellbeing of survivors of exploitation, abuse and harassment and will maintain confidentiality in investigations I am involved in. With the exception of a situation where the situation poses danger to Foundations staff, when the safety of staff is the priority.
- 19)I will Declare for any relation or business relation that might affect the work result and to avoid conflict of interest.
- 20)I will ensure confidentiality and respect the needs of beneficiaries not release to others any private and confidential information relating to the Foundation or its partners, unless legally required to do so.
- 21)I will be responsible for the use of information, assets and resources to which I have access by reason of my employment with my organization
- 22)I will ensure I obtain informed consent for all personally identifying information that I collect from Foundation's beneficiaries, including images, videos, and stories of children.
- 23)I will not misuse the Organization's or its partners offices, vehicles, or work equipment in any manner and will never use such assets against the Code of Conduct. Work equipment includes computers, cell phones, office walls, and internet access.
- 24)I will not the Foundation's or its partners' IT equipment to view, download, create, distribute, or save in any format sexual, inappropriate, or abusive material including but not limited to pornography or depictions of child abuse.
- 25)I will not be under the influence of alcohol or psychoactive substances in the workplace and during working hours outside the workplace.
- 26) I will not solicit or accept bribes, kickbacks, or any other improper payment.

- 27)I will not give or offer anything of value to any employee or member of any organization, including a government official, for the purpose of influencing official action or securing an improper advantage.
- 28)I will not use my position for personal advantage or to benefit relatives or close associates.
- 29)I will not falsify financial or employment records or provide false or misleading information.

Abuse prevention policy

Abuse and not reporting abuse are unacceptable at Jedność foundation. Accusations of such instances will be subject to investigation. Investigation will be carried out until correct disciplinary measures are determined including legal action when applicable. In the event of an investigation, factors like period of employment, title or relation to the Association will not be considered.

Staff at Jedność foundation is obliged to report cases of abuse or suspected abuse right away. You do not need to know all the details or be sure that abuse occurred for the report. At Jedność we treat all the requests seriously and immediately. If any process needs to be corrected, we will take action right after it's determined.

Speaking up when something seems not right is not easy. We understand you might feel uncomfortable. We do not accept retaliation for reporting. Anybody who engages in any retaliation due to reporting, will be subject to disciplinary action including termination.

Management is responsible for:

- making sure the Code of Conduct and related policies are accessible to all
- trainings on Code of Conduct
- making sure intervention process is clear to everyone
- making sure ethical issues are consistently considered in decision making and management processes (reports, trial period, performance review etc)

- administrating a system verifying that Code of Conduct is clear and familiar to all
- acting as an example for others
- promoting the knowledge of Code of Conduct and making sure that people supervised by them have the information and resources they need to follow it
- carefully listening to anybody reporting suspicious behavior
- appreciating people for speaking up and expressing care for staff members safety and overall well-being
- acting with respect and treating all reports and interventions seriously, making sure any issues are solved in a fair and appropriate manner
- reporting to the Board any unethical or inappropriate behavior

Employees are expected to:

- take responsibility for complete understanding of the Code of Conduct
- keep up-to-date on any policy changes, especially in terms of work related to that person
- look for answers and consult decisions if the right action is unclear
- refuse an action in violation of the Foundation's policy, even if that action seems to be in accordance with Jedność mission
- performing their work in a way that is not harmful to children or adults and does not put them in danger
- reporting unethical behavior or any suspected unethical behavior in good faith
- collaboration in investigations, not withdrawing information or documentation

Complaints and reports

The policy applies to all cases of abuse, as well as cases where abuse is suspected to have been committed by employees, external partners, consulting entities, suppliers, contractors, external agencies with which the employees have a professional relationship and/or other entities with which the Fundacja Jedność has a professional relationship.

Committing and concealing fraud or illegal activities is absolutely unacceptable at the Fundacja Jedność. Allegations of committing such illegal activities will be investigated until further proceedings are determined, including legal action, criminal prosecution and disciplinary action when warranted. Whenever there is a need for investigation, factors such as seniority, position, title or relationship of the suspect to the Association will not be taken into account.

Fundacja Jedność staff are obligated to bring to the attention of the relevant manager any potential incident, abuse or concern that they witness.

Staff members who have a complaint or concern relating to breach of the Code should report it immediately to their line manager by observing the principles of integrity and honesty. If the line manager is the subject of the complaint, then staff members should report to the focal point of the organization.

Fundacja Jedność employees are required to report any information or suspected behavior immediately.

You don't need to know all the facts and details or be sure that something is wrong to report a problem. At Fundacja Jedność, we will take all reports seriously, honestly and promptly, and if something needs to be fixed, we will take action based on what we learn.

Speaking up when something is wrong takes courage. We understand that person may feel uncomfortable or anxious. However, each employee should remember that we do not tolerate retaliation. Anyone who retaliates against a working person for engaging in any of the prohibited activities will be subject to disciplinary action, up to and including termination.

In the event of suspicion of the above behavior, you should:

- 1) take care of the welfare and safety of the victim first
- 2) separate the violent person from the victim if possible
- 3) report the incident of violence in one of the following ways:
- a) by talking to coordinators or focal point

- b) anonymously through an online form
- c) by email to miedinstvo@gmail.com
- d) directly to the person assisting the Board of Directors
- e) directly to the members of the Board
- 4) upon receipt of a report, the person receiving the report is responsible:
- a) for explaining the situation and hearing from the victim, the person suspected of abuse and witnesses to the incident or superiors,
- b) If abuse is found, the case is reported to the Board and disciplinary action is taken: official admonishment or dismissal of the employee/volunteer.

Feedback procedure

The beneficiaries of the project can give feedback directly to the administrator or leave feedback on the Foundation's web pages, as well as complete an anonymous online survey, which is created by the Foundation's employees. It is also possible to leave anonymous reviews in the feedback book. In online surveys, beneficiaries are guaranteed confidentiality and anonymity, unless the beneficiary agrees to the processing of personal data.

After the feedback is collected, the data is analyzed. The foundation staff examines the feedback and comments, highlights common themes and trends, and looks for practical recommendations and improvements.

After receiving feedback, the foundation's team takes action to improve its programs and projects based on the recommendations provided. This may include making changes to existing projects or developing new initiatives.

Appendix 1 Jedność (Unity) Foundation anti-bullying procedure

The anti-bullying procedure at the Jedność (Unity) Foundation defines the principles of counteracting the phenomenon of bullying, discrimination and unequal treatment in employment at the Foundation, as well as the procedure for dealing with cases concerning these behaviors.

Definitions

<u>Bullying</u> means actions or behavior concerning an employee or directed against an employee, consisting of persistent and prolonged harassment or intimidation of an employee, causing an employee's appraisal of his or her professional usefulness to be lowered, causing or intended to humiliate or ridicule an employee, isolate him or her or eliminate him or her from a team of co-workers.

<u>Harassment</u> means any unwelcome behavior that has the purpose or effect of violating the dignity of an employee and creating an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards him.

<u>Equal treatment in employment</u> means not discriminating in any way, directly or indirectly, on grounds such as gender, age, disability, race, religion, nationality, political opinion, union membership, ethnicity, religion, sexual orientation, employment of limited or indefinite duration, full-time or part-time employment.

<u>Direct discrimination</u> exists when an employee, for one or more reasons beyond his or her control - nationality, origin, age, gender, sexual orientation, fitness, etc. - was, is or could be treated less favorably than other employees in a comparable situation.

<u>Indirect discrimination</u> exists when, as a result of an apparently neutral provision, criterion applied or action taken, there is or could be an unfavorable disparity or a particularly unfavorable situation with regard to the establishment and termination of the employment relationship, terms and conditions of employment, promotion and access to training for the purpose of improving professional qualifications against all or a significant number of employees belonging to a group singled out on one or more grounds, unless the provision, criterion or action is objectively justified in view of the legitimate aim to be achieved and the means of achieving that aim are appropriate and necessary.

<u>Discrimination on the basis of sex</u> is any unwanted conduct of a sexual nature or relating to the sex of an employee, the purpose or effect of which is to violate the dignity of the employee, in particular to create an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards him. This behavior may consist of physical, verbal or non-verbal elements (sexual harassment).

General Principles

- 1. The Jedność (Unity) Foundation provides a safe and non-violent work environment in which all employees are treated with respect and dignity.
- 2. The use of bullying, harassment, discrimination and unequal treatment of employees, as well as the creation of situations that encourage such behavior, shall constitute a grave breach of basic labor obligations.
- 3. Employees shall be obliged not to take actions bearing the characteristics of mobbing and discrimination and to prevent its use.
- 4. Before hiring new employees, they are obliged to familiarize themselves with this procedure immediately prior to the employment relationship. The employee confirms the fact of familiarization with the anti-mobbing procedure by submitting a written statement.
- 5. All employees shall be treated equally with regard to the establishment and termination of the employment relationship, terms and conditions of employment, promotion and access to training for the purpose of improving professional qualifications, in particular without regard to gender, age, disability, race, religion, nationality, political opinion, union membership, ethnic origin, religion, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment.
- 6. Any discrimination in employment, direct or indirect, in particular on the basis of sex, age, disability, race, religion, nationality, political beliefs, union membership, ethnicity, religion, sexual orientation, employment for a definite or indefinite period of time, full-time or part-time employment is unacceptable.
- 7. The Board of Directors of the Unity Foundation is committed to providing a work environment free of bullying by promoting respect, cooperation and open communication.
- 8. The Board of Directors will take all necessary steps to prevent bullying and other aforementioned undesirable behavior and to pursue fair solutions and support victims of such behavior.

Dealing with bullying, discrimination and harassment

1. Any employee has the right to report incidents of bullying, discrimination or harassment without fear of reprisal, regardless of whether he is himself a victim of such behavior or a witness to it.

Reports should be addressed directly to the Board of Directors, or to the person designated by the Board of Directors as responsible for handling such reports. The report should include:

a/ a statement of the facts and, in particular, an indication of the specific actions or behaviors considered by the employee to be harassment or other adverse action referred to in this policy,

b/ the date or period to which these actions or behaviors relate,

c/ evidence (if possible) in support of the circumstances cited, including identification of witnesses,

d/ identification of the perpetrator(s) of the harassment or discrimination,

e/ date of the complaint,

f/ the employee's own signature.

- 3. The Foundation guarantees the safety of all persons reporting complaints. Given the need to provide a sense of security to all those who may wish to report abuse, unsigned complaints will also be considered, while the inability to fully verify an anonymous report may affect the effectiveness of the complaint.
- 4. All reports of bullying, discrimination and harassment will be treated as serious and will be subject to prompt and effective investigation.
- 5. To investigate a complaint, the Foundation's Board of Directors may appoint an internal committee. In particularly justified cases, an external person a mediator, psychologist or expert may be added to the commission.
- 6. The investigation shall be secret. The Board or the commission appointed by it shall consider the complaint with impartiality and shall be obliged to keep confidential all information obtained in the course of the proceedings.
- 7. The Foundation will provide support to both victims and those accused of bullying, discrimination and harassment including through counseling, counseling and other forms of psychological support.
- 8. Completion of the proceedings should take place within 30 days of the filing of the complaint. In particularly justified cases, the Board may extend the deadline for completion of the proceedings.
- 9. Persons found guilty of the aforementioned undesirable actions will be subject to the disciplinary liability provided for in the Labor Code, including disciplinary termination of employment.
- 10. The Foundation also reserves the right, in addition to disciplinary consequences, to take legal action against the perpetrators of bullying, discrimination or harassment in accordance with applicable law.

- 11. The Foundation, to the extent of its resources and capabilities, may support an Employee who has been a victim of bullying or harassment in seeking financial compensation from the direct perpetrator.
- 12. Unfounded slander of bullying, harassment, discrimination and unequal treatment in bad faith is prohibited.

Appendix 2 Procedure for good governance at the Jedność (Unity) Foundation

WORK ORGANIZATION

- 1. The Foundation is not required to have Labor Regulations in the sense of the Labor Code and has not adopted such regulations.
- 2. The Member of the Board of Directors responsible for labor matters is Olena Postolnyk.
- 3. The Foundation has not set fixed hours and place of work performance or the method of documenting occupation and leaving the workplace. The hours and place of performance of work are determined depending on the requirements of the position and the tasks performed, and the way of documenting the work performed - on individual arrangements.
- 4. The Foundation allows remote work from home, this is possible both on the basis of verbal consent of the supervisor and a permanent agreement between the employee and the employer.
- 5. Persons performing work for the Foundation, regardless of the position held and the type of contract, shall perform the work in accordance with the rules established at the conclusion of the contract and on the basis of ongoing instructions issued by the Board member responsible for personnel matters, or a person designated by him coordinating the work of the employee/contractor in question.

- 6. The day of payment of wages shall be:
 - a) from the 1st to the 10th of the month for salaries under an employment contract,
 - b) from the 1st to the 10th of the following month for salaries under a contract of mandate,
 - c) the date resulting from the contract for salaries under a work contract.
- 7. A person who performs tasks for the Foundation may collect an advance to cover related costs in the amount agreed with the person directly supervising his work. The advance shall be paid by transfer to a bank account.
- 8. Settlement of the collected advance payment and out-of-pocket expenses incurred by the person performing tasks for the Foundation shall be made immediately after the completion of the tasks for the coverage of which it was intended, but no later than the 7th day of the month following the month in which these tasks were completed, under pain of non-recognition. The basis for settlement of the advance payment is a properly completed form with all attachments including receipts and invoices.

EQUALITY OF OPPORTUNITY

- The Foundation shall ensure equality of opportunity for all employees, regardless of their gender, age, health and other characteristics beyond their control. Equal opportunity means, among other things, equal access to employment, the same working conditions and pay for similar positions, and freedom from stereotypical perceptions of social roles traditionally assigned to the genders.
- 2. When recruiting new employees, it is unacceptable to require the attachment of a photo, the indication of age, and the acquisition of information that is not directly relevant to the tasks to be performed in a given position.
- 3. The Foundation applies transparent principles of remuneration, based on objective criteria and professional achievements, regardless of gender and other factors unrelated to the quality of work performed.

- 4. Employees with direct care of minors may take advantage of flexible work arrangements, such as remote working, flexible working hours and parental leave, to allow for a balance between professional and personal responsibilities.
- 5. The planning of events and activities should take into account factors that allow all people to participate, including those caring for minor children, dependents requiring care, or those with special needs.
- 6. All activities should be planned in a way that facilitates access for people with special needs. Depending on the nature of the activity and, the target group, as well as the financial and organizational capacity of the Foundation, activities should take place in a place without architectural barriers, which can be reached by public transportation adapted to persons with mobility impairments. If possible, halls equipped with an induction loop should be selected.
- 7. When recruiting for events, include an open-ended question about the special needs of the applicant and, as far as financial and organizational possibilities allow, ensure that these needs are taken into account.
- 8. In publications and other materials, use feminatives and/or neutratives where possible, and ensure that their content does not perpetuate harmful stereotypes about gender, age and other characteristics.
- 9. Where appropriate, taking into account financial, organizational and technical capabilities, materials published on the website should be developed in such a way as to be accessible to people with visual and hearing impairments. They should be published in machine-readable format, graphic elements should be accompanied by alternative text.

CONCLUSION AND SETTLEMENT OF CONTRACTS

- 1. The member of the Board responsible for handling contracts and settlements is Olena Postolnyk.
- 2. In order to ensure full transparency in the conduct of the Foundation's affairs and the disbursement of funds at the Foundation's disposal, decisions regarding the assumption of financial obligations, including the conclusion of employment contracts, grant agreements and other agreements making the Foundation a creditor or debtor, shall be made by all members of the Board.
- 3. It is unacceptable for one person to make declarations of intent or incur obligations on property without first informing all members of the Board.
- 4. Independently of the provisions of the Statute and the organizational structure, employees shall be involved, as far as possible, in making key decisions on the functioning of the Foundation, in particular, in matters directly affecting them.

ENVIRONMENTAL RESPONSIBILITY

- 1. The Foundation conducts all activities in a way that minimizes their negative impact on the environment and requires all employees to consider environmental aspects in the performance of their tasks.
- 2. When planning purchases of office supplies, one should be guided not only by price and quality, but also by environmental impact. Preference is given to recycled materials and products and/or those made of biodegradable plastics.
- 3. Wherever possible, paper consumption should be reduced in favor of digital document management. Invoices, contracts, reports and documents received electronically may be printed only in exceptional situations, if necessary for the efficient execution of tasks.
- 4. If printing of materials is necessary, the option of duplex printing and toner saving should be used.
- 5. Employees are required to segregate waste. The Foundation provides appropriate containers for waste segregation, including paper, plastic, metal, glass and organic waste.
- 6. Employees are required to conserve water and electricity, in particular, to turn off lights in rooms where no one is present, to turn off electronic equipment

that they are not using at the time, and to make efforts to use all consumable resources sparingly.

7. 7 When the Foundation organizes stationary events, choose locations that allow access by public transportation.

USE OF COMPANY EQUIPMENT

- 1. With the knowledge and consent of the Board of Directors, it is permissible to use company computer equipment for purposes other than those directly related to the performance of tasks for the Foundation. The scope and conditions of use are determined individually.
- 2. It is unacceptable to install any programs on computers owned by the Foundation without the consent of the person responsible for IT security of the Foundation.
- 3. On equipment owned by the Foundation it is forbidden to download, install, possess any content that may violate the law, including copyright.
- 4. It is forbidden to circumvent the IT security measures installed on the official computer equipment.

USE OF PRIVATE EQUIPMENT FOR BUSINESS PURPOSES

- 1. With the knowledge and consent of the Board of Directors, persons performing tasks for the Foundation may use private equipment when performing them.
- 2. In the case of using private computer equipment to carry out tasks related to the processing of personal data, the person responsible for the Foundation's IT security must be allowed to familiarize himself with the programs installed on the equipment in question and the security measures applied. If it is determined that they are insufficient to ensure the security of the personal data processed on the equipment in question, the owner of the equipment must agree to install additional safeguards. Installation of additional security features shall be at the expense of the Foundation.
- 3. With the knowledge and consent of the Board of Directors, persons performing tasks for the Foundation outside their place of residence may use a private car for business trips, provided that an appropriate agreement

regulating the terms of use and method of settlement is signed with the Foundation in advance. The basis for settlement is the Mileage Register presented by the vehicle owner.

4. The use of a private car for business purposes is possible only when it is not possible to cover a given route by public transport or it would involve significant difficulties or inconvenience.

HANDLING PURCHASES OF GOODS AND SERVICES

- 1. All purchases of goods and services shall be made in accordance with the provisions of the relevant grant agreements, the execution of which shall be coordinated by project coordinators under the supervision of the Board.
- 2. Notwithstanding contractual requirements, purchases of products and services shall be made in an economically reasonable manner, minimizing their possible negative impact on the broader environment (not only natural).
- 3. When purchasing goods and services, comparison of bids shall be used. Comparison of offers may be waived if the value of the subject of the contract does not exceed PLN 2,000, and the subject of the contract itself does not differ significantly from previous purchases of a similar nature.
- 4. In the case of purchases not exceeding a unit price of PLN 10,000, a minimum of 3 offers from different suppliers should be taken for comparison, and these may be price offers published by them on the Internet or in other offer materials.
- 5. In the case of the purchase of goods or services with a unit price exceeding PLN 10,000, a request for proposals should be sent to a minimum of 3 entities offering such goods or services, and an announcement should be placed on the Foundation's website. The minimum time for submitting bids should not be less than 5 working days.

- 6. In the case of comparable prices, it is advisable to apply additional criteria, such as:
- a) the entity submitting the bid is a social economy entity and/or employs people at risk of social exclusion,
- b) local products will be used for the contract, which will have a positive impact on reducing the carbon footprint,
- c) the products or services take into account issues relevant to environmental protection.

PROVIDING PUBLIC INFORMATION

- 1. The Foundation strives for openness and transparency in its activities, fulfilling its obligations under the law on access to public information and other laws governing the provision of information. Implementing the policy of openness and transparency of activities, the Foundation makes public on its website all key documents, including substantive and financial reports on its activities, and on individual projects.
- 2. Information on projects implemented with public funds shall be published on the Foundation's website or provided upon request, within no more than 14 days. In particularly justified cases, when the provision of information within 14 days is not possible, the Foundation shall inform the applicant indicating the planned date of providing information, which may not exceed 2 months.
- 3. The Foundation shall make available, upon request, information on donations received from legal entities in excess of PLN 15,000, or donations received from one donor who is a legal entity within one tax year in excess of a total of PLN 35,000 in accordance with the provisions of the Law on Corporate Income Tax.

Appendix 3 Procedure for preventing conflicts of interest at the Jedność (Unity) Foundation

Goal

This procedure for preventing conflicts of interest at the Think Tank City Foundation has been developed to ensure transparency, fairness and efficiency.

Definitions

<u>Conflict of interest</u> - a situation in which a member of the Board of Directors of the Foundation or an Employee of the Foundation takes actions or decisions on behalf of the Foundation that may bring financial or personal benefit to himself or to persons/entities related to him.

<u>Related persons</u> - persons who are in a marital relationship, in cohabitation or in a relationship of consanguinity or affinity in the direct line, consanguinity or affinity in the collateral line to the second degree, or are related by adoption, guardianship or custody.

Purchases of goods and services

- 1. When purchasing goods and services, comparison of bids shall be used. Comparison of offers may be waived if the value of the subject of the contract does not exceed PLN 2,000, and the subject of the contract itself does not differ significantly from previous purchases of a similar nature.
- 2. In the case of purchases not exceeding a unit price of PLN 10,000, a minimum of 3 offers from different suppliers should be taken for comparison, and these may be price offers published by them on the Internet or in other offer materials.
- 3. For purchases of goods or services with a unit price exceeding PLN 10,000, a request for quotations should be sent out to a minimum of 3 entities offering such goods or services, and an announcement should be placed on the Foundation's website. The minimum time for submitting bids should not be less than 5 working days.
- 4. The subject matter of the contract should be described as precisely as possible and include key, as far as possible unambiguously verifiable, selection criteria. When determining the criteria for selection of an offer, it is necessary to take into account, in addition to the criterion of price, all relevant criteria (experience of the bidder, type of guarantee provided, etc.) and then assign appropriate weight to each of them.
- 5. The request for quotation should include, depending on the type of contract: description of the subject of the contract, conditions for participation in the

proceedings, criteria for evaluation of tenders, deadline and method of submission of tenders, deadline for execution of the contract, prohibition of conflict of interest, conditions for amendments to the contract, description of parts of the contract and variant tenders.

- 6. In the process of planning and purchase of goods and services may not be involved, at any stage of the process, persons who may have a personal interest in a particular award this may include persons whose relatives or entities in which they are involved may be interested in submitting their bid.
- 7. In the event of receipt of an offer from a person close to a Board Member or an Employee of the Foundation, the Board Member or Employee of the Foundation in question shall be obliged to inform about this fact, declaring a conflict of interest and excluding themselves from any activities related to the selection process.
- 8. In the case of purchase of goods or services from entities in which the Board Members of the Foundation, Foundation Employees or their relatives participate, the purchase is possible only if the price is not higher than market prices, the purchase was made in a transparent procedure taking into account the comparison of offers, and the Board Member/Foundation Employee concerned was excluded from the proceedings.
- 9. Persons involved in the purchasing process are to keep confidential information about the budget for the planned purchases (if it is not indicated in the inquiry/announcement available to all), as well as the bids submitted by potential contractors and their prices.

Employment of personnel

- 1. Employment of personnel (regardless of the form of employment) shall be conducted in a transparent and competitive manner, in a process to which all interested persons are admitted.
- 2. In particularly justified cases, it is possible to waive open recruitment and hire people in a non-competitive mode. The decision to waive the competitive procedure is made by the Board.
- 3. Recruitment announcement should be posted on the Foundation's website with a deadline for submission of offers of not less than 5 working days.
- 4. It is unacceptable, except in exceptional and substantively justified situations, to specify in the job advertisement the sex and age of the employee sought, as well as to request that his/her photo be attached to the application.
- 5. The Foundation allows the application of special preferences in hiring to people with refugee experience, as people with difficult access to the labor market.

- 6. The recruitment announcement should contain all key information about the expectations of the candidate, the criteria for selection and the conditions of employment.
- 7. In the case of application of a person close to a Board Member or Foundation Employee, the Board Member or Foundation Employee in question shall be obliged to inform the Board of this fact and exclude himself from the recruitment process.
- 8. Persons involved in or having knowledge of the recruitment process beyond what is presented in the recruitment announcement are obliged to keep it confidential.

Use of the Foundation's assets

- 1. Members of the Board and Employees of the Foundation may use the Foundation's equipment for private purposes, if the Board of the Foundation agrees, and the form and extent of the use of this equipment for private purposes will not adversely affect the activities of the Foundation.
- 2. As a rule, the Foundation shall not grant loans to Board Members or Foundation Employees. The Board of Directors of the Foundation may pass a resolution to grant such a loan, but it must be justified by the special situation of the borrower. If such a loan is granted, consideration should be given to providing a similar opportunity to all other Employees, on the same terms.
- 3. In the case of disposal of the Foundation's assets, they may be purchased by a Board Member or an Employee of the Foundation only if they offer the most attractive price. For this purpose, an announcement of the sale should be published on the Foundation's website, with a deadline for submission of purchase offers of no less than 5 working days.

Responsibilities of the Employee

- An Employee of the Foundation shall be obliged to identify and disclose potential
 conflicts of interest with respect to entities or persons with whom they had a
 contractual relationship or have a relationship that may affect their objectivity when
 making decisions or taking actions towards these entities on behalf of the
 Foundation.
- 2. It is inadmissible to undertake activities that could cause a conflict of interest between a Board Member or an Employee of the Foundation and the Foundation, in particular for personal gain or competitive activities towards the Foundation.
- 3. If a potential conflict of interest is identified, the person concerned shall be obliged to exclude himself or herself from the decision-making process on behalf of the

Foundation in a given case. He or she should also do so if his or her private views may adversely affect the decisions made on behalf of or for the Foundation.

Other

- 1. If you are in doubt as to whether a situation gives rise to a conflict of interest, you should consult a Board Member of your choice.
- 2. A person reporting a possible conflict of interest to the Board of Directors shall not be discriminated against for that reason.
- 3. A person reporting a possible conflict of interest to another Employee or Board Member of the Foundation shall not be penalized or discriminated against for this reason, even if his/her doubts are not confirmed, if he/she reported them in good faith and had grounds for doing so.