Approved
By order of the Chairman of the Board
NGO "Pro Futuro Foundation"

September 7, 2023

Code of Conduct and Key Policies
PRO FUTURO FOUNDATION

Send feedback and suggestions to the email address:
fprofuturo@gmail.com

INTRODUCTION

"Pro Futuro Foundation" (NGO) - a non-governmental non-commercial organization created to protect the rights and freedoms of a person and a citizen, to satisfy public, in particular, economic, social, cultural, educational, and other interests of its members and/or other persons. **"PRO FUTURO FOUNDATION" strives to implement in practice the best quality of work of its employees, partner organizations and other partners.**

The "PRO FUTURO FOUNDATION" set of Key Policies is a detailed guide to the most important basic principles that are important to our work and reflect our goals and vision.

The "PRO FUTURO FOUNDATION" Code of Conduct is the essence of the PRO FUTURO FOUNDATION's Key Policies and contains a detailed guide to the standards of conduct expected of all PRO FUTURO FOUNDATION employees. The PRO FUTURO FOUNDATION Code of Conduct and all of the PRO FUTURO FOUNDATION Key Policies below must be interpreted in the aggregate.

Unless otherwise specified for individual policies, the following rules apply to the PRO FUTURO FOUNDATION Code of Conduct and PRO FUTURO FOUNDATION Key Policies.

Terms of use

These policies apply to PRO FUTURO FOUNDATION. The NGO Code of Conduct and Key Policies of PRO FUTURO FOUNDATION apply to all PRO FUTURO FOUNDATION humanitarian aid and development staff, full-time and part-time, PRO FUTURO FOUNDATION board members, volunteers, interns, consultants, visitors, acting on behalf of PRO FUTURO FOUNDATION (hereinafter "PRO FUTURO FOUNDATION Employees") and – to the extent indicated in the table below – to PRO FUTURO FOUNDATION supplier companies and partner organizations (hereinafter "PRO FUTURO FOUNDATION Partners"), if in the respective policies do not specify otherwise. This PRO FUTURO FOUNDATION Code of Conduct and PRO FUTURO FOUNDATION Key Policies apply both during and after business hours.

The PRO FUTURO FOUNDATION Code of Conduct and the PRO FUTURO FOUNDATION Key Policies are an integral part of contracts with all PRO FUTURO FOUNDATION employees and must be reflected – as appropriate – in all contractual relationships with PRO FUTURO FOUNDATION partners. Signing the contract with PRO FUTURO FOUNDATION and attendance letters, which are distributed during PRO FUTURO FOUNDATION employee training, confirms understanding and acceptance of these policies.

	TERMS OF APPLICATION FOR		
	Employees PRO FUTURO FOUNDATIO N	**Partner organizations PRO FUTURO FOUNDATION**	**Suppliers PRO FUTURO FOUNDATION**
PRO FUTURO FOUNDATION CODE OF CONDUCT	**Yes**	**Yes** (if the partner organization does not have its own code of conduct containing all the key principles)	**Key principles apply to suppliers who are in direct contact with the PRO FUTURO FOUNDATION beneficiary**

INTRODUCTION

PRO FUTURO FOUNDATION SAFETY AND SECURITY POLICY	**Yes**	**No**	**No**
PRO FUTURO FOUNDATION SECURITY POLICY	**Yes**	**Yes, to an extent** (key principles must be followed)	**Yes, to an extent** (key principles must be followed)
ANTI-CORRUPTION PRO FUTURO FOUNDATION POLICY	**Yes**	**Yes** (unless the partner organization has its own policy containing all key principles)	**Yes, to an extent** (key principles to be defined in the contract)
PRO FUTURO FOUNDATION CONFLICT OF INTEREST POLICY	**Yes**	**Yes** (unless the partner organization has its own policy containing all key principles)	**Yes, to an extent** (key principles to be defined in the contract)
POLICY OF PRO FUTURO FOUNDATION WITH PROTECTION OF CHILDREN	**Yes**	**Yes** (unless the partner organization has its own policy containing all key principles)	**Key principles apply tosuppliers who are in direct contact with the PRO FUTURO FOUNDATION beneficiary**
PRO FUTURO FOUNDATION SEXUAL EXPLOITATION AND ABUSE POLICY	**Yes**	**Yes** (unless the partner organization has its own policy containing all key principles)	**Key principles apply tosuppliers who are in direct contact with the PRO FUTURO FOUNDATION beneficiary**
Whistle-blower Policy PRO FUTURO FOUNDATION	**Yes**	**Yes** (in situations that are directly related to PRO FUTURO FOUNDATION and/or affect it)	**No**

OBLIGATION TO REPORT AND INVESTIGATE ALL VIOLATIONS

Any known or suspected cases of abuse, exploitation, harassment, or other forms of unacceptable behaviour that are directly violation of the PRO FUTURO FOUNDATION Code of Conduct and PRO FUTURO FOUNDATION Key Policies. Human Resources (HR) should always be notified. Depending on the potential severity of the complaint, the following channels may be used:

PRO FUTURO FOUNDATION APPLICANTS	TYPE OF COMPLAINT/ STATEMENT	SUBMITTED	PROCEDURE
Beneficiary	Any problems	Program management PRO FUTURO FOUNDATION	Mechanism of feedback and response to community levels (CFRM)
Partner	Any problems	Program management PRO FUTURO FOUNDATION	Personally/for by e-mail

INTRODUCTION

Employees	Any problems	Program guide PRO FUTURO FOUNDATION	Personally/for by e-mail
Employees	The problems are related to the management of the organization	Board of PRO FUTURO FOUNDATION	Personally/for by e-mail
Employees	Individual cases of personal/conf.kh-ru	Section coordinators of the PRO FUTURO FOUNDATION	Personally/forby e-mail
Employees	Gross and systematic abuse, criminal activity, serious risks, loss of business reputation, etc	Board of the organization PRO FUTURO FOUNDATION	Policy on corporate information
Employees	Serious problems, if other standard ways cannot prevent	Management of the organization PRO FUTURO FOUNDATION	By email fprofuturo@gmail.com
Employees	Problems related to directors	Supervisory Board of PRO FUTURO FOUNDATION	Personally/for by e-mail

The main ones principles of investigation

A confidential, sensitive, thorough and prompt investigation should be the appropriate response to a complaint or statement. Such an investigation may result in either abatement of the problem or further actions identified herein as appropriate. The subject of the complaint must be given an opportunity to explain and/or respond to the allegations before any disciplinary action is taken against him.
The applicant and the subject of the complaint must be protected from any form of intimidation, threats, reprisals or retaliation as a result of the alleged incident. If any PRO FUTURO FOUNDATION employee is found guilty of intimidating or retaliating against an applicant or a person contributing to the investigation, disciplinary action will be taken up to and including dismissal.
Any information relevant to the case must be kept strictly confidential and can be provided only if necessary.
Any advance false or malicious statements or allegations against another employee or third party shall be considered gross misconduct.
All concerns about violations of these standards of conduct expressed by PRO FUTURO FOUNDATION employees, partners or beneficiaries are recorded and securely stored.
If a criminal offense is suspected, the suspect is informed that in addition to disciplinary measures, the case may be referred to the relevant legal authorities for further investigation.

PRO FUTURO FOUNDATION's response to violations

In case of significant violations of the PRO FUTURO FOUNDATION Code of Conduct and key PRO FUTURO FOUNDATION policies, PRO FUTURO FOUNDATION
will immediately take appropriate measures to protect the interests of the victims. These may include:

PRO FUTURO FOUNDATION employees full-time or part-time	disciplinary measures up to dismissal
Volunteers and interns PRO FUTURO FOUNDATION	taking measures, up to termination of the contract
Consultants PRO FUTURO FOUNDATION	termination of the contract
Visitors PRO FUTURO FOUNDATION	taking measures, up to the termination of visiting support
Partners PRO FUTURO FOUNDATION	termination of the contract
Partner organizations PRO FUTURO FOUNDATION	taking measures, up to and including termination of funding or support and/or termination of the partnership agreement

Depending on the nature and circumstances of the case, PRO FUTURO FOUNDATION may involve relevant authorities to ensure the protection of PRO FUTURO FOUNDATION employees, partners and/or beneficiaries.

Supervision and evaluation by PRO FUTURO FOUNDATION

Every year, PRO FUTURO FOUNDATION evaluates the implementation of this policy with the aim of consistently applying best practices and acquiring knowledge in the conditions of a changing environment that strives for development.



CODE OF CONDUCT
PRO FUTURO FOUNDATION

CODE OF CONDUCT

TERMS OF USE

The PRO FUTURO FOUNDATION Code of Conduct applies fully to all full-time or part-time PRO FUTURO FOUNDATION employees, volunteers, interns, consultants, and persons acting on behalf of PRO FUTURO FOUNDATION - hereinafter "PRO FUTURO FOUNDATION Employees".

The PRO FUTURO FOUNDATION Code of Conduct also applies to partner organizations, if they do not have their own code containing all the key principles of the PRO FUTURO FOUNDATION Code of Conduct. The key principles also apply to PRO FUTURO FOUNDATION suppliers who are in direct contact with PRO FUTURO FOUNDATION beneficiaries.

INTRODUCTION

"PRO FUTURO FOUNDATION" is a non-governmental non-profit organization created to exercise and protect the rights and freedoms of a person and a citizen, to satisfy public, in particular, economic, social, cultural, educational and other interests of its members and/or other persons. "PRO FUTURO FOUNDATION" strives to implement in practice the best quality of work of its employees, partner organizations and other partners.
The "PRO FUTURO FOUNDATION" set of Key Policies is a detailed guide to the most important basic principles that are important to our work and reflect our goals and vision.
The "PRO FUTURO FOUNDATION" Code of Conduct is the essence of the PRO FUTURO FOUNDATION's Key Policies and contains a detailed guide to the standards of conduct expected of all PRO FUTURO FOUNDATION employees. The PRO FUTURO FOUNDATION Code of Conduct and all of the PRO FUTURO FOUNDATION Key Policies below must be interpreted in the aggregate.
Unless otherwise specified for individual policies, the following rules apply to the PRO FUTURO FOUNDATION Code of Conduct and PRO FUTURO FOUNDATION Key Policies.

ADDITIONAL DOCUMENTS that should be identified together with the organization's Code of Conduct:

- Security Policy.
- Policy of providing security.
- Anti-corruption policy.
- Conflict of interest policy.
  Child Protection policy.
- Policy of protection from sexual exploitation and violence.
- Signaling policy.



CODE OF CONDUCT

Standards of behavior

Employees of PRO FUTURO FOUNDATION are obliged to avoid any unacceptable behavior and adhere to the following norms:

The highest standards of personal and professional behavior that are consistent with the beliefs, policies, values, mission and vision of PRO FUTURO FOUNDATION

All employees of PRO FUTURO FOUNDATION ensure that their behavior during working hours and outside of working hours contributes to maintaining the positive reputation of PRO FUTURO FOUNDATION.
All people should be treated with respect and dignity. Any form of discrimination based on race, gender, religion, social status, skin color, national or ethnic origin, age, disability, sexual orientation, etc. is unacceptable. As part of PRO FUTURO FOUNDATION programs necessary ensure the well-being of children; any behavior that could harm children,including physical, sexual, emotional abuse and neglect, is prohibited.
PRO FUTURO FOUNDATION employees must comply with local laws and norms of cultural life and behave in accordance with cultural characteristics.
Since PRO FUTURO FOUNDATION is a disinterested, neutral and non-denominational organization, it is forbidden to participate in political activities or in the promotion of religious values that may negatively affect the working goals of the organization or harm the perception of PRO FUTURO FOUNDATION as a neutral organization. NGO employees must always express themselves appropriately, look and dress according to their position in a certain situation, creating a worthy and positive reputation of PRO FUTURO FOUNDATION. Possession, distribution or use of prohibited substances in the workplace (including PRO FUTURO FOUNDATION vehicles) or during performance of official duties. It is unacceptable to perform any work under the influence of alcohol, drugs or other illegal substances.

Ban on participation in activities, which is illegal or could endanger the work of PRO FUTURO FOUNDATION

Participating in or supporting any illegal or criminal activity is unacceptable. Any cruel treatment of children and adults, their exploitation, as well as all actions contrary to basic human rights are prohibited.
Any inappropriate behavior or actions that could jeopardize the reputation of PRO FUTURO FOUNDATION should be avoided.

Prohibition of corruptionand conflicts of interest with work or reputationPRO FUTURO FOUNDATION

Corruption and fraudulent actions are unacceptable. More detailed information is given inAnti-corruption policy PRO FUTURO FOUNDATION.

CODE OF CONDUCT

PRO FUTURO FOUNDATION employees may not use their official position for personal profit or benefit and must avoid situations in which personal interests may conflict with the interests of PRO FUTURO FOUNDATION. The main principles and relevant procedures for preventing such situations are set out in a separate Conflict of Interest Policy of PRO FUTURO FOUNDATION.



Sexual exploitation is prohibited and insult

A sexual relationship between a PRO FUTURO FOUNDATION employee and a beneficiary may be based on inherently unequal power dynamics, and may undermine trust in PRO FUTURO FOUNDATION and its work. Accordingly, PRO FUTURO FOUNDATION considers such relations unacceptable.
Sexual relations with children (persons under the age of 18) are prohibited regardless of the locally established age of majority or age of sexual consent. An erroneous assumption about the age of the child is not a circumstance that exempts from responsibility.
Unacceptable sexual relations in exchange for money, goods, services and favors.



Prohibition of bullying, harassment, discrimination, intimidation and abuse

PRO FUTURO FOUNDATION employees must act honestly and fairly. All people should be treated with dignity and respect, PRO FUTURO FOUNDATION employees should not be disrespectful, exploitative or degrading.
Any form of physical violence, except in cases of self-defense, is unacceptable and will result in immediate dismissal.
The use of inappropriate, cruel or offensive expressions in relation to other persons in oral or written form is unacceptable.



Responsibility in relation to assets, resources or informationPRO FUTURO FOUNDATION data

PRO FUTURO FOUNDATION employees are expected to use the NGO's assets, financial and other resources responsibly, as well as report on them in accordance with relevant NGO policies and procedures. PRO FUTURO FOUNDATION equipment must not be used for any illegal activity, including any form of harassment, intimidation or degrading actions or comments.
All commissioned project goods and services must be used appropriately. Damage to the property of PRO FUTURO FOUNDATION and property directly related to the work of PRO FUTURO FOUNDATION is unacceptable, asboth intentionally and as a result of gross negligence.
Personal or confidential information related to the work of PRO FUTURO FOUNDATION must not be shared outside the organization in oral or written form, through mass media, social networks or otherwise, unless required by law.

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Responsibility for one's own health, safety, as well as for the health, safety of subordinates

Employees of PRO FUTURO FOUNDATION are obliged to comply with local regulations safety rules and act consistently within the framework of PRO FUTURO FOUNDATION health and safety policies.
Employees must conduct themselves in such a way as to avoid unnecessary risks to the health, safety and security of themselves, their team members and those under their supervision. The same approach should be applied to partner organizations and beneficiaries of NGOs.

Obligation to report all violations of the PRO FUTURO FOUNDATION Code of Conduct

Incidents, problems and suspected violations of this Code should be brought to the attention of the responsible senior manager.
In connection with the Code, false or malicious accusations are unacceptable.
All information regarding violations of the Code of Conduct must be handled as discreetly as possible and in accordance with the PRO FUTURO FOUNDATION Policy on corporate information.

APPENDIX 1. Forms of unacceptable behavior, PRO FUTURO FOUNDATION terminology

Clear definitions are necessary to correctly understand, classify, report and respond to individual violations of the PRO FUTURO FOUNDATION Code of Conduct. All the forms of behavior listed below are indicated in the Security Policy of the NGO and in the Code of Conduct of PRO FUTURO FOUNDATION as "unacceptable behavior".

Derision
Abuse is the wrong, improper use or treatment of anything or anyone that causes harm, loss or suffering, or causes injury. There are several forms of abuse (such as physical abuse, verbal abuse, sexual abuse, and emotional abuse), each of which can be the result of an intentional act, negligence, or ignorance.

Baiting
Harassment at the workplace (verbal, physical or otherwise) is repeated unacceptable behavior of one or more persons against another, which is reasonably considered to interfere with the realization of a person's right to be treated with dignity at the workplace.
An isolated incident of such behavior may be considered an insult to dignity at work, but an isolated incident is not considered harassment. Exercising the legal rights and responsibilities of management/employees is not harassment.

The following patterns of behaviour are examples of bullying types.

- Verbal or written insults and attacks
- Less favorable treatment than other colleagues
- Trespassing - molestation, spying or stalking
- Threatening behaviour
- Intimidation
- Excessive control over work
- Humiliation
- Refusal to provide work-related information
- Unreasonable change in the content or goals of a person's work, or manipulation of them
- Blame for something that is beyond the person's control
- Manipulating the victim's reputation by spreading rumours, gossip or ridicule
- Limiting the victim's ability to express themselves through loud criticism or obscene language
- Constant insults, ridicule and criticism directed at personal characteristics
  Isolation and victimization
- Aggressive behavior towards others, including unreasonable anger and shouting
- Violence or threat of violence
- Persistently manipulating the nature of the work or the victim's ability to perform the work, including through excessive workload, setting goals with impossible deadlines, intentionally withholding information about the work, or setting unreasonable or unachievable tasks
- Constant criticism of work that is not balanced, if possible, with positive feedback or the proposal of alternative solutions
- Criticism of a person's abilities and personality in the presence of others

Cruel treatment of children

Child abuse and neglect is defined as all forms of physical and/or emotional abuse, sexual abuse, callous or negligent treatment, commercial or other exploitation that causes actual or potential harm to a child's health, survival, development or dignity in the context of relationships of responsibility, trust or power.
Cruel treatments of children are divided into five subtypes:

- Physical abuse is actual or perceived physical injury to a child, such as hitting, kicking, or shaking.
- Emotional abuse is harm caused by persistent and severe emotional abuse or rejection, such as humiliating punishment, threats, bullying or denial of care and affection resulting in adverse consequences for the behavior and emotional development of the child or young person.
- Neglect occurs when basic needs such as food, warmth and medical care are not met, resulting in a serious impairment to the health or development of a child or young person.
- Sexual abuse occurs when a child or young person is pressured or coerced into engaging in any sexual activity, with or without their consent. Sexual abuse includes incest, rape and fondling, showing pornography or viewing pornographic images of children. Sexual abuse can involve siblings, other family members, or non-family members.
- Commercial or other exploitation of a child means involving a child in work or other activities for the benefit of others. Among other things, this includes child labor (the minimum permissible age for employment or work is 15 years, and for work that may endanger health, safety or moral component (so-called "worst forms of child labor"), is 18 years old) and child prostitution. Such actions causedamage to the physical or mental health of the child, his education, moral or social-emotional development of the child.

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Conflict of interest

A conflict of interest is a situation where PRO FUTURO FOUNDATION employees use their workplace or PRO FUTURO FOUNDATION's name, logo or reputation for personal gain or benefit. This can happen in the following situations:

- When PRO FUTURO FOUNDATION employees, their family members or friends supply goods or services to PRO FUTURO FOUNDATION, except for those cases where they have undergone a fair and fully transparent selection process.
- When PRO FUTURO FOUNDATION employees directly hire andcontrol their family members, bypassing the usual open selection process.
- When family members or friends become beneficiaries of PRO FUTURO FOUNDATION employees of the NGO, by passing the usual process of selection of beneficiaries.
- Receiving loans from PRO FUTURO FOUNDATION beneficiaries

More detailed information is provided in the Conflict Policy interests of the PRO FUTURO FOUNDATION.

Corruption

Corruption is the abuse of entrusted power for personal gain. This includes offering, giving, demanding or receiving financial or material gifts, loans, rewards, provisions or any other benefits from a third party/third party as an inducement to achieve anything dishonest, illegal or that undermines trust within contractual relations. This applies, in particular, to the following cases:

- Bribery and receiving bribes, extra gifts or services in exchange for support, goods or services of PRO FUTURO FOUNDATION
- Providing and receiving profit, including the return of part of the payment under the contract ("bribe")
- Payments for simplification of procedures
- Fraud and embezzlement (using entrusted funds for personal use)
- Agreements that reduce competition
- Extortion and money laundering

More detailed information is provided in the PRO FUTURO FOUNDATION's Anti-Corruption Policy.

Discrimination

Discrimination is unequal treatment of individuals or groups of individuals based on personal characteristics such as disability, appearance and group characteristics such as ethnicity, religion, etc. Common forms of discrimination include (but are not limited to) employment or program enrollment decisions based on marital status, race, minority, sex, religion or non-religion, color, national or ethnic origin, citizenship, language, marital status, birth , sexual orientation, age, disability, political beliefs, socio-economic background, caste, HIV or AIDS status or other diseases, as well as appearance and lifestyle.

- Training programs that are not based on objective needs assessment or analysis situations that result in men receiving more benefits than women or vice versa
- Employment preferences based on membership of a religious or ethnic group, as opposed to members of other faiths or groups
- Stigmatization or denial of services to people with HIV and AIDS status Provision of
- services only to representatives of certain ethnic, religious or political groups

Exploitation

Exploitation means using existing power, influence or control over resources to pressure, coerce, impose or manipulate anyone to do something against his/her will or interests or well-being. This includes threats to deny project assistance, threats to make public false statements about a person, or other threats that could lead to negative consequences in the workplace or in society.

Operation include (among others) the following examples:

- Providing special privileges to beneficiaries or other program participants in exchange for express, necessary or incidental favors (including sexual favors) or providing benefits to either an employee or a third party
- Threats or insinuations that a person's refusal or unwillingness to comply will affect their right to assistance and support under the project or their working conditions Involvemen
- of children in hard, dangerous, long or forced labor
- Sale, purchase and transportation of children, women or men by coercion or deception, with the aim of obtaining economic or other benefit

Persecution

Harassment is unacceptable behavior related to personal characteristics such as race, membership of a minority group, gender, religion or non-religion, skin color, national or ethnic origin, language, marital status, civil status, sexual orientation, age, disability, political beliefs, socio-economic status, caste affiliation, HIV or AIDS status or other diseases, as well as appearance or lifestyle, which are intended or have the effect of limiting human dignity and creating a frightening, hostile, degrading environment, humiliating and offensive environment for a person. Such inappropriate behavior may consist of actions, requests, spoken words, gestures, or the production, display, and distribution of texts, images, and other materials.
Persecution also includes a less favorable attitude towards a person, from thatthe reasons why she denies or accepts the behavior described above.
Anyone can become a victim of harassment. Harassment can be a single incident or a repeated act. It can take many forms and may include written documents, the use of information technology such as e-mail, text messages, photographs or drawings.

Types of persecution

- Verbal attacks - jokes, comments, taunts or songs
- Written attacks including textual message, electronic letter or message
- Physical oppression - pushing, kicking and any form of assault
- Intimidation - gestures, posing and threatening postures
- Visual images such as posters, emblems and badges Isolation
- Withdrawal from social activity

- Being forced to behave in a way that the person considers inappropriate - for example, being asked to dress in a way that does not match the person's ethnic or religious characteristics

Human trafficking

Trafficking in persons means the recruitment, transportation (including without provision of return transportation), transfer, harboring and acceptance of persons committed by the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or vulnerability, or by providing or receiving payments or benefits to obtain the consent of a person who has control over another person for the purpose of exploiting him.

Intimidation

Intimidation is an action intentionally aimed at causing timidity and fear, or coercion into submission through fear. Bullying is intended to cause another person to fear or feel inferior by making threats or instilling fear of consequences for them and their family or friends. Bullying can be verbal, non-verbal and physical.

Modern slavery

Modern slavery refers to situations in which one person deprives another personthe right to freedom - the freedom to dispose of one's body, the right to refuse certain types of work or to stop work - for the purpose of its exploitation. Freedoms are taken away through threats, violence, coercion, abuse of power and deception.

Sexual abuse

any actual abuse or attempted abuse of a vulnerable position, power or trust for the purpose of obtaining services of a sexual nature, including, but not limited to, committing acts or threats to commit acts of a sexual nature against sexual integrity in unequal conditions or in conditions of coercion, with the use of force (including non-contact interaction and committing acts of sexual exploitation and abuse in cyberspace). Any act of a sexual nature involving minors is sexual harassment.

Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, power or trust for the purpose of obtaining a benefit (material, social or political) by sexually exploiting another person.

Sexual harassment

Sexual harassment - any unwanted actions of a sexual nature, expressed in verbal or physical form, the purpose of which is to humiliate or offend a person or to create such an effect or any other actions of a sexual nature that will be perceived or interpreted similarly. Many forms of behavior can constitute sexual harassment, including:

- Physical acts of a sexual nature, including unwanted contact such as excessive touching, patting, pressing or touching another person's body, violence and coercion.
- Verbal actions of a sexual nature. This may include unsolicited sexual advances, offers or coercion of sexual acts, persistent offers to continue socializing outside the workplace after it has been made clear that such offers are unsolicited, unwanted, and offensive flirting, innuendos, or lewd comments.

- Non-verbal action of a sexual nature. This includes displaying pornographic or sexually suggestive images, objects, written materials, social media posts, emails, and text messages. This can also include smiles, whistling, and overt sexual gestures.
- Sexualized behavior. This may include behavior that belittles, ridicules, or physically abuses an employee because of his or her gender, or is otherwise demeaning or gender based.

I have carefully read and understood the Code of Conduct and Key Policies of PRO FUTURO FOUNDATION and agree to comply with their requirements and undertake to adhere to the necessary standards of conduct.
I understand that failure to comply with any principles of the PRO FUTURO FOUNDATION Code of Conduct and Key Policies may result in disciplinary action up to including dismissal and, where appropriate, may also result in civil and criminal proceedings against me.

Name:..... Signature:.....

Date:..... Organisation:.....

Location:.....



Security policy
PRO FUTURO FOUNDATION

Security policy

PRO FUTURO FOUNDATION recognizes that especially in situations of poverty, humanitarian crisis and/or conflict, crisis-affected people, especially children, can be extremely vulnerable. At the same time, the safety and well-being of vulnerable children and adults exposed to the NGO Code is extremely important to us. Therefore, we recognize it as our primary responsibility to protect all vulnerable people who participate in our programs and activities from all forms of abuse and exploitation.

Defining the NGO's obligation to protect children and vulnerable people, this Policy has the following objectives:

- Protect beneficiaries (both children and adults) participating in NGO programs from all forms of abuse and exploitation.
- Protect NGO staff from all forms of abuse and exploitation, as well as from any potential false or malicious allegations of misconduct.
- Protect the organizational integrity and reputation of the NGO, as well as its partners, by implementing a robust protection policy that helps to understand the rights and responsibilities of stakeholders.

The policy sets out the commitments made by the NGO and informs staff and related staff of their safeguarding responsibilities.
The expected standards of behavior of NGO employees are outlined in the NGO Code of Conduct, which is an integral part of this Policy. The NGO Code of Conduct is a key tool for preventing all forms of unacceptable behavior by NGO employees. The NGO should also help partner organizations to strengthen their own existing policies, codes or other instruments or, if necessary, develop new ones.

Terminology

Protection means the protection and provision of health, welfare human rights opportunities to live free from harm, abuse and neglect. In our sector, we understand that this means protecting people, including children and at-risk adults, from harm arising from contact with our staff or programmes.

This policy is an integral part of the NGO Policy package Code of Conduct and other key policies, so please refer to the NGO Code of Conduct for all relevant terminology.

Suitability

The NGO Protection Policy applies to all full-time and part-time employees of the NGO Department, members of the NGO Board of Directors, volunteers, interns, consultants, visitors, people acting on behalf of the NGO ("NGO Staff") and - to the extent appropriate - suppliers and NGO partner organizations (hereinafter referred to as "NGO partners").

Political statement

People have the same right to freedom from abuse and exploitation. The NGO believes that everyone it comes into contact with, regardless of age, gender, disability, sexual orientation or ethnic origin, has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, NGO staff and partners must never engage in any form of degrading, humiliating, abusive, exploitative or otherwise unacceptable behavior under any circumstances.

Security policy

COMMITMENTS PRO FUTURO FOUNDATION

Obligations to beneficiaries

- In our programs, PRO FUTURO FOUNDATION is committed to protecting our beneficiaries. PRO FUTURO FOUNDATION will take all reasonable measures to protect them from any form of harassment, violence and exploitation that may be perpetrated by PRO FUTURO FOUNDATION employees and partners. For this reason, all employees and partners of PRO FUTURO FOUNDATION are obliged to respect the rights and dignity of individuals, families and communities with whom we work.
- We oppose all forms of sexual harassment, exploitation and violence, which we consider to be among the worst forms of misconduct and abuse of power. We recognize that certain vulnerable groups such as children, women, the elderly, people with disabilities and others may be at particular risk and should be under our watchful eye.
- To be able to properly deal with the protection of beneficiaries, PRO FUTURO FOUNDATION employees and partners must be fully aware of and respect local cultural and religious customs. However, under no circumstances can these features be used as an excuse or motive for inappropriate behavior. PRO FUTURO FOUNDATION does not accept the use of respect for local culture as an excuse for inappropriate actions or ignoring them.
- Beneficiaries of PRO FUTURO FOUNDATION must be aware of their basic rights and the standards of conduct that are presented to employees and partners of PRO FUTURO FOUNDATION. A Community Feedback and Response Mechanism (CFRM) should be established so that our beneficiaries can raise any issues that arise.

Obligations to employees

- PRO FUTURO FOUNDATION is committed to protecting the rights of PRO FUTURO FOUNDATION employees and maintaining a decent work environment free of any potential harassment, violence and exploitation. Each employee of PRO FUTURO FOUNDATION must be aware of the internal procedures that provide the opportunity to raise a problem concerning unethical or unacceptable behavior of his/her colleagues.
- The basic principles and standards of behavior of employees and partners of the NGO are outlined in the PRO FUTURO FOUNDATION Code of Conduct. PRO FUTURO FOUNDATION is aware that material violations of these principles could significantly undermine PRO FUTURO FOUNDATION's core values and vision, and that this would adversely affect PRO FUTURO FOUNDATION's reputation and its ability to achieve its goals.

The policy also addresses the following safety areas: child safety, adult safety, and protection from sexual exploitation and abuse. It should be noted that these key areas of safety are addressed only in this policy, and their more specific aspects are described in various relevant PRO FUTURO FOUNDATION policies and procedures, including: the Child Protection Policy and the PRO FUTURO FOUNDATION Policy on Protection from Sexual Exploitation and violence
The CSO is committed to ensuring security throughout its operations through three core principles: (1) prevention, (2) alerting, and (3) response.

Security policy

Basic principles of security

I. Basic principle: Prevention PRO FUTURO FOUNDATION

Liability of PRO FUTURO FOUNDATION

PRO FUTURO FOUNDATION should:

- Ensure that all employees have access to this policy, are aware of it and know their responsibilities under this policy
- Implement strict security procedures in the recruitment, management and engagement of employees and support staff
- Ensure proper gender balance in your office and field teams. Provide security training for
- employees at a level appropriate to their role in the organization
- Ensure that the selection of beneficiaries and the distribution of benefits are carried out in an open manner; and that no individual employee of PRO FUTURO FOUNDATION can single-handedly decide (or be considered to be the decision-maker) about the distribution of benefits.
- To plan and run its programs and activities in such a way as to protect people from any risk of harm that may arise as a result of their contact with PRO FUTURO FOUNDATION. This includes collecting and sharing information about people participating in our programs. Thus, PRO FUTURO FOUNDATION will ensure that all beneficiaries are adequately informed and in a way that is accessible to their understanding:
    - About the amount of assistance to which they are entitled, criteria for selecting beneficiaries and other necessary information about assistance
    - That PRO FUTURO FOUNDATION employees and/or staff of partner organizations provide assistance without any discrimination
    - That distributed goods and services cannot be withdrawn or revoked by the arbitrary sole decision of an individual employee of PRO FUTURO FOUNDATION or an employee of a partner organization of PRO FUTURO FOUNDATION
    - That the assistance is free (except when the beneficiaries are formally required to make financial contributions) and that PRO FUTURO FOUNDATION employees or its partner organization is not allowed to accept bribes, rewards, gifts or any favors (including sexual) from the beneficiary
    - About the norms of behavior expected from PRO FUTURO FOUNDATION employees and its partner organizations
    - About the existence, purpose and availability of CFRM
- On prompt response to notifications about security and compliance with due process.

DUTIES OF EMPLOYEES
Ensuring the safety of children

Pro Futuro Foundation emloyees and support staff cannot:

- Have sexual intercourse with anyone under the age of 18
- Sexually abuse and exploit children
- Exercise physical, emotional or psychological violence against a child or neglect him/her
- Engage in any form of commercial exploitation of children, including child labour or trafficking in children

Additional information is provided in PRO FUTURO FOUNDATION's Child Protection Policy.

ENSURING THE SAFETY OF ADULTS

- assault and exploit at-risk adults
- Physically, emotionally or psychologically abuse or neglect adults at risk
- Protection from sexual exploitation and violence

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance intended to be directed at the beneficiary
- Enter into any sexual relationship with the beneficiaries or their close relatives because they are based on a pre-existing unequal position

For more information, see PRO FUTURO FOUNDATION's Sexual Exploitation and Abuse Protection Policy.

In addition, PRO FUTURO FOUNDATION employees and support staff are obliged to:

- Contribute to the creation and maintenance of an environment that prevents security breaches and promotes the implementation of the Security Policy
- Notify officials of any concerns or suspicions regarding violations of security principles by PRO FUTURO FOUNDATION employees or support staff

Features of PRO FUTURO FOUNDATION partner organizations

It is a mandatory condition of every partnership agreement or contract that PRO FUTURO FOUNDATION adheres to and complies with this Policy and the Code of Conduct, as appropriate. If the PRO FUTURO FOUNDATION partner organization does not comply with the principles of this Policy, the NGO reserves the right to withdraw funding and/or terminate all existing partnership agreements.

As PRO FUTURO FOUNDATION recognizes that partner organizations may have their own policies, codes and other instruments, this Policy and NGO Code of Conduct are not intended to replace or supersede them. Representatives of partner organizations should ensure that:

- The employees of the partner organization followed the key principles of ethics and norms of conduct
- All necessary due process were established and monitored in their organization A CFM was
- established for the beneficiaries
- In case of non-compliance with the standards of this Policy, appropriate measures were taken

Security policy

II. The main principle: Providing the opportunity to submit an application PRO FUTURO FOUNDATION

PRO FUTURO FOUNDATION ensures that employees and the communities we work with will have access to optimal, safe and appropriate means of reporting security issues. But senior staff are trained in how to investigate complaints.

Any employee reporting problems or complaints using through official disclosure channels (or if they make a request), will be protected as described in PRO FUTURO FOUNDATION's Corporate Disclosure Policy.

PRO FUTURO FOUNDATION also accepts complaints from external sources such as members of the public, partners and official bodies.

How to report security issues security:
PRO FUTURO FOUNDATION strives to create an environment in which victims and individuals concerned about security issues can freely report. Therefore, PRO FUTURO FOUNDATION requests all beneficiaries, NGO employees and partner organizations to inform PRO FUTURO FOUNDATION of all suspicions and disclosures related to security.

- For feedback and complaints that may come from beneficiary communities, PRO FUTURO FOUNDATION has established a Community Feedback and Response Mechanism (CFRM).
- For information provided by employees of the NGO and partner organizations of PRO FUTURO FOUNDATION, the mechanism of corporate information is used as described in the Policy of PRO FUTURO FOUNDATION on corporate information.

Employees who have a security complaint or concern can also immediately report it to their security coordinator or line manager. If an employee does not feel comfortable contacting their safety coordinator or line manager (for example, if they believe that the message will not be received properly or that this person is involved in the problem), they can use the communication channels described above (for example, CFRM and corporate informing). 1
All incidents must be recorded and handled in accordance with proper investigation procedures and standards as described in the PRO FUTURO FOUNDATION Investigation Manual.

III. Basic principle: Reaction PRO FUTURO FOUNDATION

PRO FUTURO FOUNDATION will consider all appeals related to the provision of security and issues raised in this regard in accordance with the principles and obligations as described in the Code of Conduct (see the section Basic Principles of Investigation) and in accordance with other relevant policies, in particular, the Corporate Policy informing the PRO FUTURO FOUNDATION, the Community Feedback and Response Mechanism (CFRM) and the Investigation Policy.

Security policy

A confidential, sensitive, thorough and prompt investigation should be the appropriate response to a complaint or statement. Such investigation shall result in either abatement of concern or further action as outlined in PRO FUTURO FOUNDATION's Investigation Guidelines, which shall include disciplinary action up to and including dismissal and/or notification to appropriate authorities.
PRO FUTURO FOUNDATION will take appropriate disciplinary action against employees found to have violated policies in accordance with the NGO Code of Conduct and its PRO FUTURO FOUNDATION Response to Violations section.
PRO FUTURO FOUNDATION will provide support to victims of harm caused by employees or support staff, regardless of whether formal internal response measures have been taken (e.g. internal investigation). The decision on the form of support will be made by the victim.

PRINCIPLES OF ENSURING SECURITY

PRO FUTURO FOUNDATION adheres to the following security principles:

- Empowerment – people should be supported to make their own best informed decisions.
- Prevention is better to take action before disaster strikes
- Protection - our support and protection is needed by those who are in the most difficult situation. Collaboration - Safeguarding is about different people, professions, groups and communities working together to cover all aspects of prevention, detection and reporting of abuse and neglect.
- Proportion - we do must be proportionate to the risk: we don't want to over-protect where the risk is low, because that in itself can put people at a disadvantage and deprive them of their ability to make their own decisions.
- Accountability – As with everything we do, we must be accountable for everything we do to ensure safety.
- Confidentiality – It is important that confidentiality is maintained at all stages of security-related issues. Information related to the problem and further management of the case should be transmitted only on a need-to-know basis and should always be securely stored.



ANTI-CORRUPTION POLICY OF PRO FUTURO FOUNDATION

Anti-corruption policy

INTRODUCTION

PRO FUTURO FOUNDATION recognizes that corruption is one of the main threats to the credibility of non-governmental non-profit organizations in the eyes of beneficiaries, benefactors and the general public, and that, importantly, corruption can negatively affect the quality of our services. Corruption violates the basic rules of healthy competition and leads to results that do not contribute to public welfare and are not productive. In most countries, corruption is punishable by law.

Corruption is in direct conflict with such principles as transparency, reliability, solidarity, justice and democracy, firmly embedded in all activities of the PRO FUTURO FOUNDATION. With this Policy, PRO FUTURO FOUNDATION confirms its commitment to a policy of absolute zero tolerance for corruption and presents binding principles for combating corrupt behavior, minimizing the risk of fraud and other related abuses.

TERMINOLOGY

Corruption is the abuse of power in the private interests of any person. This includes offering, giving, demanding or receiving financial or material gifts, loans, rewards, provisions or any other benefits from a third party or to a third party as an incentive to achieve something dishonest, illegal or that undermines trust within the contractual relationship. Corrupt actions include, among others, the following illegal actions: giving or receiving bribes; provision and receipt of profit; extortion; fraud and embezzlement; agreements that reduce competition; money laundering; return of part of the contractual fee ("rollback"); receiving or giving excessive gifts and excessive hospitality; paying excessive prices or fees to third parties for personal and/or organizational gain; or any other services from contractors, suppliers, partners, their employees or through government officials. Bribery is one of the most widespread forms of corruption, which is the act of transferring money, goods or other forms of remuneration to the recipient (usually an official or a person who has a public legal duty) in exchange for a change in their behavior.

Fee for simplification of procedures - a common form of bribery; these are usually small, informal payments used to secure or expedite routine or necessary actions to which the payer has a legal or other right.

Extortion - illegal use of one's official position or position for obtaining money through coercion or threats.

Extra Gifts and Extra Hospitality – Gifts and hospitality that range from small gifts (such as diaries) to expensive tokens of hospitality (tickets to important events, holidays, etc.). Extravagant gifts and hospitality can disguise bribery and are intended to encourage corrupt behavior1.

Incitement is the act of a person asking, ordering or encouraging someone to commit bribery or another crime.

Appropriate and justified giving and receiving of gifts, hospitality or reimbursement of expenses is not considered corruption, if it does not affect the conclusion of the contract or does not provide other direct benefits.

Anti-corruption policy

STANDARDS OF BEHAVIOR REGARDING CORRUPTION

As stated in the PRO FUTURO FOUNDATION Code of Conduct, corrupt or fraudulent behavior in any form is unacceptable. For this reason, employees and partner organizations of PRO FUTURO FOUNDATION are obliged to comply with the following rules:

- Corruption in any form - direct or indirect - as defined above is prohibited. If you are faced with a demand for a bribe, the response to such a request should be to reject such demands. Corrupt actions involving third parties (friends and relatives, partner organizations, etc.) or for their benefit are also prohibited.
- Demanding a bribe or any other form of corruption is unacceptable.
- Making contributions and/or receiving direct or indirect grants and donations from political parties, politically active organizations or individuals considered as corrupt actions and prohibited if their purpose is to obtain profit by these benefactors or third parties. Donations received from political parties, politically active organizations or individuals are subject to public disclosure in accordance with the general rules for disclosure of information about donations in the organization's annual report.
- It is forbidden to provide information that can give advantages to the participant (participants) of the tender.
- Resource, especially individual financial donations, funds from institutional benefactors and any other types of sponsorship services should not be used for corrupt purposes.
- It is unacceptable to provide fees for facilitating procedures or to provide any other material incentives in non-monetary form in order to guarantee a result or speed up a formal procedure to which the organization is legally entitled.

The only circumstance in which bribery cannot be avoided is when someone's health or safety is seriously threatened. However, all CSO transactions should be planned to minimize the risk of duress payments. At the same time, in case of kidnapping, PRO FUTURO FOUNDATION's policy on inadmissibility of release for ransom shall be enforced.

COMMITMENTS PRO FUTURO FOUNDATION

In order to minimize the probability of corruption, PRO FUTURO FOUNDATION undertakes to apply the following:

- The management of PRO FUTURO FOUNDATION actively implements the idea of "zero tolerance for corruption" and maintains appropriate internal procedures and control mechanisms to ensure that the employees of PRO FUTURO FOUNDATION and partner organizations adhere to the principles of this Policy.
- This Policy is disseminated through existing internal and external communication channels and through appropriate practical training provided to all employees of PRO FUTURO FOUNDATION and partner organizations.
- This Policy is an integral part of all relevant contractual relationships. In case violations of this Policy will be subject to disciplinary and contractual sanctions, up to and including termination of the contract.
- It is made clear that no PRO FUTURO FOUNDATION employee or partner organization will be restricted in their rights if they refuse to pay a bribe or participate in any other corrupt scheme.

Anti-corruption policy

- All employees of NGOs and partner organizations are obliged to report all cases of corruption (including attempted bribery) and any violations and problems related to this Policy as soon as possible. For this purpose, accessible and safe channels of information that deserve trust should be used, in particular - the Policy of PRO FUTURO FOUNDATION on corporate information. All cases of corruption (including attempted bribery) are registered and
- promptly investigated in a proper manner.
- Partner organizations, before the start of the first joint activity, undergo a proper assessment for compliance with anti-corruption principles.
- The NGO informs its beneficiaries as much as possible that corruption is prohibited within the PRO FUTURO FOUNDATION. All advertising materials related to free help and services of the NGO must contain the following:

  "All goods and services provided by the NGO within the framework of this project are free of charge. In the event that in exchange for these goods or services, a claim for payment or other compensation is received, a representative of the management of the PRO FUTURO FOUNDATION should be immediately informed."

- The final selection of beneficiaries is based on a transparent set of criteria, and the staff of PRO FUTURO FOUNDATION must guarantee compliance with these criteria and the absence of corrupt practices during the selection process.
- The NGO consistently adheres to the Principles of Procurement for the purpose of fair and transparent use of public and private funds. The management of the NGO at all levels is responsible for compliance with this Policy. The NGO guarantees that its contractual partners
- must confirm that they do not admit to corrupt behavior and have never been legally convicted of fraud or corruption. This especially applies to:
  - Implementation contracts and other contracts related to the implementation of projects financed by PRO FUTURO FOUNDATION or partners of PRO FUTURO FOUNDATION with the help of PRO FUTURO FOUNDATION.
  - Contracts for the performance of works related to construction and reconstruction, where PRO FUTURO FOUNDATION is the customer
  - Contracts of PRO FUTURO FOUNDATION with consultants and freelancers

In addition, this applies to other contracts, if such confirmation is required taking into account the circumstances.
I am the following:

"The Contracting Party further declares and warrants that the Contracting Party does not accept corrupt and fraudulent practices, practices based on collusion and/or disempowering practices, and that neither the Contracting Party nor its management have been convicted of an offense or a crime in their professional activities a decision that has entered into legal force."

- As for HR, the management of PRO FUTURO FOUNDATION at all levels is responsible for developing regulations that will minimize the risks of corruption, internal nepotism and other forms of alleged abuse. This applies primarily to hiring procedures, which must be transparent and based on a resume, an interview, at least two references and appropriate testing. Different procedures should be clearly justified.
- The management of PRO FUTURO FOUNDATION ensures the existence of control mechanisms that regularly supervise compliance with the above principles, and their periodic updating and revision in accordance with the current legislation applicable to them.

APPENDIX 1

LIST OF POTENTIAL INDICATORS BRIBERIES AND CORRUPTION

List of potential indicators of bribery and corruption

- A list of examples of potential indicators of bribery and corruption, which can be used to detect bribery:
- Atypical cash payments
- Exercising pressure in order to make a payment urgently or before the deadline
- Payments are made through a third country (for example, goods or services are delivered to country "A", but payment is made, as a rule, by a shell company in country "B")
- Paying an abnormally high percentage of commissions to an individual agency. It may be split into two accounts of the same agency, often in different jurisdictions Private
- meetings with government contractors or companies hoping to bid for contracts
- Receiving luxurious gifts
- A person never takes a day off, even if sick, does not go on vacation, or insists that he/she personally deals with specific contractors alone When accepting projects or
- contracts, he/she makes unexpected or illogical decisions
- Unusually trouble-free progress in business, provided that a person does not have the expected level of knowledge and experience
- Abuse of the decision-making process or delegated authority in specific cases
- Negotiating contracts that are disadvantageous to the organization neither in terms nor in
- terms of timing Unclear preference given to certain contractors during the tendering period
- Evading independent audits of tendering or contracting processes Obstructing specific
- roles and departments that are key to the tendering/contracting process
- Bypassing normal tender/contract procedures Reconciliation of
- invoices beyond the contract, without good reason Absence of
- documents and reports on meetings and decisions Non-
- compliance with company procedures and principles
- Payment and allocation of financial funds, high expenses, tuition fees, etc. in the interests of others.
- Unusual and/or inappropriate delays on the part of public authorities in relation to usualclearly defined procedures - probable expectation of a bribe



PRO FUTURO FOUNDATION
CONFLICT OF INTEREST POLICY

Conflict of interest policy

Introduction

PRO FUTURO FOUNDATION (MGO) recognizes that the conflict of interest between the employees of the NGO and the persons connected with the company, on the one hand, and the NGO as an organization, on the other hand, can negatively affect the performance and reputation of the organization, and can also lead to various forms of corruption. The purpose of this Policy is to minimize such risks through clear definitions and examples of conflicts of interest, descriptions of standards of conduct and related responsibilities.

Terminology

A conflict of interest is a situation in which the impartial and objective performance of official duties and decision-making by an employee or partner of the NGO is jeopardized or comes into conflict with his personal, family, political, economic or other interests. In other words, a conflict of interest is also a situation in which an employee or partner of an NGO may use his official position to achieve personal benefit or profit, where his activities (both at work and outside) may conflict with the interests of the organization and give him inappropriate advantages, which would contradict the principles of free economic competition.

Standards of conduct, which apply to conflicts of interest.

As stated in the PRO FUTURO FOUNDATION Code of Conduct, NGO employees cannot use their official position for personal gain or profit and must avoid situations in which personal interests may conflict with the interests of the NGO. The same principle applies to NGO partners.

- Public political and religious activity in which the NGO is used as a vehicle for political/religious propaganda.
- Participation or membership in organizations, alliances and associations whose activities are in serious conflict with the activities, values and good reputation of the NGO.
- Outside work and other types of activities outside the NGO that contradict the activities, values or good reputation of the NGO.
- Receiving donations or other income from partner organizations or business partners of the NGO and keeping them for personal use.
- Use of confidential information obtained within the framework of working relations with NGOs for personal purposes or in the interests of third parties.
- Use of official duties within the framework NGO or refer to them for personal gain.
- Giving preference to family members if they are employees of the NGO.
- Entering into sexual relations with the beneficiaries of the NGO.
- Carrying out entrepreneurial activities in the sphere of activity of the NGO Intimate personal relations with the beneficiaries of the NGO or with representatives of organizations that are in business relations with the NGO.
- Membership in organizations, boards, or evaluation committees of charitable institutions from which the CSO is seeking funding.
- Participation in the management and control bodies of partner
- organizations. Hiring family members.

- A share in the authorized capital, ownership of shares or membership in a company or business that has business relations with the NGO (this item applies to family members and close relatives of employees of the NGO).

The procedure for resolving conflicts of interest

All employees and partners of the NGO must first of all avoid conflicts of interest. In case of occurrence or probable occurrence of such a situation, each employee and partner of the NGO must notify your immediate supervisor (or NGO partner coordinator) about this as soon as possible for the purpose of further consultations. Failure to comply with this requirement may result in disciplinary action or contractual sanctions. There are several options for preventing conflicts of interest and reducing subsequent risks.

- Complete elimination of the conflict of interests - for example, leaving the board of the donor organization, refusing other public activities, refusing to hire family members, etc. In this case, there is no need to resolve the situation within the framework of the NGO's Conflict of Interest Policy.
- Abstention from decision-making in situations of existing conflict of interests - for example, abstention from voting in the board of directors of the donor institution during voting in the NGO.
- Consultation - in the event that it is impossible to resolve the situation or overcome the circumstances by eliminating the conflict or refraining from making a decision, all employees and partners of the NGO are obliged to inform their head of the department about this situation, and together with him make a decision regarding actions in this situation. If the conflict of interest is assessed as serious, it must be brought to the Supervisory Board (SR).
  - Conflict of interest involving local employees must be agreed with the head of the sector.
  - Key policies of the NGO – Policy of the NGO on conflict of interest.
  - A conflict of interest involving employees of the NGO departments and the Supervisory Board should be the subject of consultation with the Chairman of the Supervisory Board.
  - A conflict of interest involving a director of an NGO should be the subject of consultation with the executive committee of the NGO, and the results should be reported to the Board of Trustees of the NGO. If a conflict of interest is discussed in the Supervisory Board, the discussions must be properly recorded and archived as a confidential appendix to the minutes of the Supervisory Board meeting. Members of the Supervisory Board, heads of missions and heads of departments of NGOs must annually sign a declaration of conflict of interest.
- If an employee of the NGO detects a conflict of interest in relation to another person from among the employees and partners of the NGO, he is obliged to notify the director of the relevant department or, in urgent cases, apply the Policy of the NGO on corporate information.
- If an employee of a public organization is subject to criminal prosecution, he must immediately notify his immediate supervisor.



PRO FUTURO FOUNDATION
CHILD PROTECTION POLICY

Child protection policy

PRO FUTURO FOUNDATION (NGO) recognizes that especially in conditions of need, humanitarian crisis and/or conflict, children can be extremely vulnerable. For this reason, the NGO recognizes as its primary responsibility the protection of children participating in our programs and activities from all forms of violence and exploitation. By defining the obligations of NGOs to protect children and e stablishing key parameters of desirable or unacceptable behavior, this policy pursues the following goals:

- Protection of children participating in NGO programs from all forms of abuse or exploitation.
- Protection of NGO employees from false or malicious accusations of wrongdoing. Protecting
- the organizational integrity and reputation of the NGO, as well as its partners, by applying a well-thought-out Child Protection Policy that helps prevent unacceptable behavior from occurring.

Terminology

A child is a person under the age of 18 (eighteen), in accordance with the Convention on the Rights of the Child. Child protection is an activity or initiative aimed at protecting children from any form of harm, especially harm caused by child abuse and neglect.
Child abuse is the physical, sexual, emotional abuse or neglect of a child that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or authority.

This policy is an integral part of the set of policies in the Code of Conduct and other Key Policies, so please refer to the policies, so please refer to the NGO Code of Conduct for an understanding of the relevant terminology.

Terms of use

PRO FUTURO FOUNDATION's child protection policy applies to all full-time and part-time employees of the NGO, members of the Supervisory Board of the NGO, volunteers, interns, consultants, visitors, persons acting on behalf of the NGO (hereinafter "Employees of the NGO") and - to the appropriate extent - on the supplier company of the GO and partner organizations (hereinafter "GO Partners"), for details see in the Code of Conduct of the NGO.

Program statement and obligations of the NGO

PRO FUTURO FOUNDATION upholds the rights and obligations of the United Nations Convention on the Rights of the Child and is thus designed to protect the children participating in its programs from harm, exploitation and violence. Thus, the NGO strives for implementation and maintenance measures from protection children Here belongs to the following:

- This Policy is implemented and made available to all new employees and partners of the NGO; regular retraining is organised for those employees who work directly with children. NGO projects involving direct interaction with children include risk analysis in the field of child protection.
- A comprehensive recruitment process is in place for staff who work directly with children to ensure child safety (see below for details).
- There are procedures for reporting and responding to potential violations of this policy.

Monitoring and enforcement of this Policy is mandatory for all CSO staff, including heads of sectors, senior managers, staff working with children and the child protection adviser. Management is responsible for regularly reviewing the policy and disseminating it to the target audience.

Child protection policy

Norms of behavior and forms of unacceptable behavior

The guidelines for conduct to be followed by CSO employees and partners are described in the CSO Code of Conduct and other CSO Key Policies. Taking into account the fact that extreme sensitivity in behavior and actions is required when working with children, this Policy aims to complement the NGO Code of Conduct and emphasize those principles of behavior that should be followed and/or avoided during direct contact with children.

Standards of conduct

- Treat children with dignity and respect, regardless of nationality, race, gender, age, language, religion, political or other opinion, disability or other status.
- When working around children, stay within sight and, if possible, have another adult present.
- With regard to child labour, the NGO adheres to the Convention on the Rights of the Child, which stipulates that the work of children should not jeopardize any of their other rights, including the right to education or the right to rest and play. However, "participating states shall establish a minimum age or minimum age for employment." Therefore, NGO country programs must act in accordance with the Convention and the relevant legislation of that country.
- During the implementation of NGO programs that may concern children, allow them to participate in the development of activities, listen to them.
- Always report concerns about the protection and safety of children.
- When collecting data from children (for analysis, monitoring, evaluation, etc.), reduce the ri sk of potential harm by using culturally acceptable communication methods, obtain informed consent, ensure confidentiality, and avoid asking questions about painful experiences. If anxious data must be obtained, try to use indirect data collection methods and be prepared to refer the anxious child for professional help.
- When obtaining and/or using images of children for the purpose of attracting attention (i.e. photographing or filming a child/children):

  - Follow through standard approach as described in the CSO Media Policy Ensure that
  - the results of filming (eg photographs, films, videos) represent children in a dignified and respectful way, while children should be dressed appropriately and not in positions that may mislead or be perceived as sexually oriented.
  - When filming an image of a specific child for a specific purpose (media, advocacy, fundraising, etc.), explain how the results of the filming will be used, obtain the legal consent of the child, if possible, also the consent of one of the child's parents or guardian.
  - Make sure that images of children that are available for public use do not include personal information

Child protection policy

Forms of unacceptable behavior

- Touching a child in an inappropriate or culturally tactless way (personnel in direct care roles should follow international and/or local industry best practice guidelines). Use offensive, degrading, sexually provocative or culturally tactless language with children, or display similar behavior.
- Involve children in any form of humiliating, offensive, sexually provocative, unacceptable or culturally tactless activity.
- Act in a way that embarrasses, humiliates, disparages or humiliates a child or otherwise inflicts emotional abuse, discriminates in any way, discriminates between children or favors one child over another.
- Apply physical punishment and behave rudely with children.
- Involve children in any form of sexual activity and conduct, including payment for sexual services and conduct or child marriage.
- To do things for the child of a personal nature, which he is able to do himself. For example, when an employee of the NGO puts on or takes off outerwear on a child, or in cases where there is physical contact when lifting or helping a child to perform certain actions. In situations where there is no other choice, such as when assisting a child with a disability, these tasks should only be carried out with the full consent of the parents/guardians and the children involved. You need to be attentive to the child's reaction, and if the child is not completely independent, talk to him about what will happen and, if possible, give him a choice.
- Access to child pornography or lewd photographs of children using any medium.
- Calling unaccompanied children without their consent and the consent of their parents or guardiansto solitary confinement seats; except when they are in immediate danger of injury or in physical danger.
- Sleep very close to children who are not related to you and are unsupervised.
- Employing children to perform household or other work that is inappropriate for their age and development level and that takes away from their learning and recreation time or puts them at risk of injury.

Reporting child abuse

Reports of child abuse and/or suspicions and responses to them within CSO programs are in accordance with the CSO Safety Policy.

All incidents must be recorded and handled in accordance with proper investigation procedures and standards.

Responding to allegations of child abuse

PRO FUTURO FOUNDATION strives to respond effectively, promptly and with due care to all allegations and suspicions of abuse. While GO takes all allegations of child abuse extremely seriously, the presumption of innocence will apply until a formal investigation into the incident is complete. All allegations will be thoroughly investigated. Certain steps to keep in mind and take into account when investigating allegations of child abuse:

- All possible efforts will be made to maintain confidentiality and ensure the rights of the victim and the accused, and information about the incident will be shared only on a need-to-know basis; in cases where the allegations are tantamount to a violation of the laws of that country, the confidentiality clause will no longer apply, unless deemed necessary to protect the rights of the victim.
- The opinion of the alleged child victim will be considered in the light of documented evidence and the fact that children rarely lie about abuse.
- The accused will always be given an opportunity to express his point of view/opinion/version of the facts.
- If necessary, during the investigation, the NGO will receive legal assistance and/or consultation from the competent authorities.
- If necessary (for example, an incident related to a violation of this Policy), the accused may be temporarily suspended from his position until the end of the investigation.
- All incidents must be recorded and handled in accordance with investigative procedures and standards.

- Building appropriate disciplinary action has been taken, including but not limited to: (a) a warning; and/or (b) removal from office; and/or (c) dismissal. Disciplinary measures depend on the nature and severity of the violation. 3
- If the accusation is related to a violation of the laws of the country in which the incident occurred, or the country of which the accused is a citizen, the incident will be immediately reported to the appropriate authorities, and the person in question will be suspended from work until the investigation is completed.

In cases where the allegation is found to be false or unsubstantiated, every effort will be made to ensure that the rights of the accused are respected.

Recruitment of reliable staff working with children

PRO FUTURO FOUNDATION (NGO) will not knowingly recruit or engage in its programs person who may pose a danger to children, especially in programs where there is regular and direct interaction with children.

To fulfill this task, the NGO applies the following measures for the safe recruitment of reliable personnel:

- During the evaluation of the candidate, the CSO will consider how and how often contact with children will take place and whether the person will have access to confidential data about children.
- Candidates will be informed about their responsibilities towards children. Applicants for positions involving contact with children will be assessed on their awareness of child protection methods and safe practices.

Candidates applying for positions that involve regular direct and/or unsupervised work with children will be subject to the following background checks prior to employment with the NGO: Two verbal

- references from previous employers/professional reviewers. The applicant's reviewers will be specifically asked to provide an opinion on the candidate's suitability for work contacting with children.

- NGO will make every effort to check the criminal records of potential candidates. However, it should be recognized that this is not always possible. In such cases, selected applicants must provide written information that they have not been charged with child exploitation crimes in the past (see Annex II).
- Applicants for projects dealing with child protection and child rights issues should first of all have special qualifications in childcare, psychology or social work.

These conditions do not apply to employees and contractors who do not normally have contact with children (headquarters management and support staff). If these individuals are required to have contact with children as part of their work, they will need to pass the above checks before they can do so. Alternatively, during such infrequent contacts, they will be accompanied at all times by staff who have been properly vetted to work with children and adults at risk.

Analysis of risks for children in NGO programs

Before starting activities with the participation of children, the NGO will analyze the potential risks for children that may arise as part of the implementation of NGO programs. These activities may include children attending trainings, working in hospitals and schools, collecting data, including conversations with children, etc.

If risks to children are identified, the project team will prepare an action plan aimed at taking measures to reduce these risks as much as possible. If the risks cannot be reduced to the required level, and the project activities will harm children, the project team should bring this matter to the attention of the mission program management, who should decide what further action can be taken to eliminate the risk(s). Activities that may harm children should not be carried out.



POLICY ON PREVENTION OF SEXUAL EXPLOITATION AND ABUSE
PRO FUTURO FOUNDATION

Policy on prevention of sexual exploitation and abuse

Introduction

PRO FUTURO FOUNDATION (NGO) is a non-governmental non-profit organization that provides emergency aid and assistance for development purposes in Ukraine in cooperation with national and international partners. The NGO strives to implement in practice the best quality of work of its employees, partner organizations and other partners. Therefore, the NGO recognizes as its main duty the protection of vulnerable population groups that participate in our programs and activities from all forms of abuse and exploitation.

Terminology

This Policy uses the definitions proposed by the United Nations (hereinafter - UN), namely:

Sexual exploitation - any actual abuse or attempted abuse of a vulnerable position, power or trust for the purpose of obtaining benefit (material, social or political) by sexually exploiting another person.

Sexual abuse - any actual abuse or attempted abuse of a vulnerable position, power or trust in order to obtain services of a sexual nature, including, but not limited to, committing acts or threats to commit acts of a sexual nature against sexual integrity in unequal conditions or under conditions of coercion, with the use of force (including contactless interaction and committing acts of sexual exploitation and abuse in cyberspace). Any act of a sexual nature involving minors is sexual harassment.

Sexual harassment - any unwanted actions of a sexual nature, expressed in verbal or physical form, the purpose of which is to humiliate or offend a person or to create such an effect or any other actions of a sexual nature that will be perceived or interpreted similarly.

Allegations of sexual exploitation and exposure - informing about the commission of acts of sexual exploitation or abuse, which, after conducting the appropriate check, was recognized as containing enough information to initiate an investigation.

Authorized persons - employees of the institution/structure who exercise control, process data and have access to information about any violations, as well as are responsible for registration and further processing of Statements on compliance with standards of ethics and conduct.

Beneficiaries - natural persons, groups or organizations that receive a corresponding benefit, directly or indirectly, as part of the implementation of projects, programs or events.

Baby - any person under the age of 18 (regardless of the local/regional specifics of determining the age of majority).

Suspicion - the cause of anxiety or worry, which at a certain stage does not exist supported by evidence and not recognized as true. In the context of sexual exploitation and abuse
- suspicion and/or rumors that personnel of the organization, program or mission are involved (past or present) in causing harm.

Data protection - systematic implementation of a complex of institutional, technical and organizational measures to protect the right to privacy in the context of collection, storage, use and disclosure of personal data.

Disciplinary measures - restrictive measures (sanctions) applied by the institution/organization based on the results of the investigation to the person who committed the relevant violation, or would be applied in the event that the fact of the violation was confirmed based on the results of the investigation completed after the person was dismissed from this institution/ organizations

Personnel - all employees involved in the activities of the organization (paid staff, volunteers, contract workers, consultants, and other persons who perform relevant functions on behalf of the organization, regardless of the type or term of their contract.

Implementation partner (implementing partner) - a structure that is accountable and responsible for ensuring the proper use of resources provided to the Union, as well as for the implementation and management of the specified program according to the work plan. Such partners can be (the list is not limited to the specified names): members of the Union, other NGOs, commercial structures, natural persons-entrepreneurs, consultants.

Informed consent - consent given voluntarily by the participant to use the information in the specified manner. If necessary, informed consent should be obtained from the childtake into account the age characteristics of this category - it is necessary to obtain informed consent also from one of the child's parents or guardian. Persons with disabilities may need appropriate support in the process of providing such consent, given the specifics of the existing violations. In any case, even with informed consent, it can be withdrawn at any time. Moreover, the person responsible for the collection of information is obliged to assess the potential consequences of its use for the personal safety of the provider and other persons involved in the process, as well as to minimize any risk associated with causing harm as a result of the use of this information.

Initial assessment - a review of the received information in order to determine the need to initiate an investigation (whether the given facts are sufficient for the prosecution of acts of sexual exploitation and abuse) or to collect additional information in order to make an appropriate decision.

Investigation - an analytical process, which involves the collection of information to determine the fact of violation of the relevant norm of the current legislation and, in case of confirmation of the violation, bringing the guilty persons or organizations to justice.

Violation - sexual abuse, sexual exploitation or sexual harassment.

Notice of prosecution - a written notice sent by the responsible structure to the specified party, indicating the facts that are the basis for the indictment, and a request to the party to provide its comments. Usually sent as part of an investigation.

Report a potential incident involving sexual exploitation and abuse- information provided (by the applicant or another person (source)) about behavior that may contain signs of violation of the SEAanti-policy and provisions of the code of ethics and conduct but needs verification.

The subject of the report / investigation- the person whose actions are the object of the investigation/report.

Reasonable notice- during the investigation, it was established that there is sufficient evidence to establish the fact of sexual exploitation and abuse.

Unfounded message- the available evidence was not sufficient to complete the investigation, or the investigation concluded that the evidence was not sufficient to establish the fact of sexual exploitation and abuse, for a number of reasons - this does not always mean that the accusation was found to be false.

Zero tolerance policy- a policy that prohibits any form of sexual exploitation and abuse by staff, including implementing partners, and mandates prosecution of such actions.

Terms of use

The PRO FUTURO FOUNDATION (NGO) Policy on Prevention of Sexual Exploitation and Harassment (hereinafter the "SEX Policy") fully applies to all full-time and part-time employees of the NGO, volunteers, interns, consultants and persons working on behalf of the NGO , hereinafter referred to as "NGO Personnel".

The CSO Policy also applies to NGO partner organizations, if they do not have their own CSO Policy, which would contain all the key principles of the CSO Policy. The key principles also apply to CSO providers who are in direct contact with CSO beneficiaries.

This CSO Policy is related to the CSO Code of Conduct and must be interpreted in conjunction with it and the CSO's Key Policies, especially the CSO's Security Policy and the CSO's Child Protection Policy.

Basic principles

In order to protect the most vulnerable adults and children and ensure the integrity of the international activities of NGOs, the following six basic principles must be observed:

1. Sexual exploitation and abuse, as well as child abuse by NGO employees, constitute gross abuse and, therefore, grounds for dismissal.
2. Sexual acts with children (persons under the age of 18) are prohibited, regardless of the age of majority or the locally accepted age of sexual consent. An erroneous assumption about the age of the child is not a circumstance that exempts from responsibility.
3. NGO employees are prohibited from exchanging money, work, goods or services for sex, including sexual services or other forms of humiliating or exploitative and degrading behavior. This also applies to the exchange of assistance belonging to program participants.

4. A sexual relationship between an NGO employee and a beneficiary is most likely to be based on an unequal position and may undermine trust in the NGO and its work. Therefore, the NGO considers such relations unacceptable.

5. In cases where NGO personnel have concerns or suspicions of sexual violence or exploitation, or child abuse by co-workers, regardless of whether they are employees of the NGO, they must immediately report such concerns using established notification mechanisms.

6. CSO employees are required to create and maintain an environment that prevents the occurrence of sexual exploitation and violence, as well as child abuse, and therefore contribute to the implementation of the CSO's Code of Conduct and related policies. CSO managers at all levels bear separate responsibility for the creation and development of systems that support this environment.

Requirements to prevent sexual exploitation and exposure

Sexual exploitation and abuse (hereafter SEA) is a violation of the Code of Conduct of the NGO and the Security Policy of the NGO. The NGO does not tolerate sexual exploitation and violence in any form, as well as bullying and a range of non-sexual abuses of power committed by employees and partners of the NGO against any person, regardless of age, gender, sexual orientation, disability, religion or ethnic origin.

The organization recognizes the following behavior as unacceptable and prohibited:

- sexual relations with children who have not reached the age of 18, regardless of her desire and voluntary consent;
- sexual exploitation, as any form of unacceptable behavior of a sexual nature, in exchange for the exchange of money, receiving material assistance, employment, the possibility of receiving shelter, goods or services of commercial sex, including sexual harassment, abuse, etc.;
- Sexual harrasment in a working environment;
- manifestations sexual, physical, psychological violence.

The NGO undertakes to do everything necessary to prevent the negative impact of its programs on the beneficiaries and the public, such as SEA (sexual exploitation and abuse) by the employees and partners of the NGO. CSO takes all allegations and concerns about sexual exploitation and abuse seriously, and thoroughly investigates complaints that indicate a possible violation of this policy, the CSO Code of Conduct, and other key CSO policies.

SEA in the context of personnel policy of the GO

Prevention is an important component of the Policy, therefore, a sensitive approach to personnel selection is used, and measures are implemented to inform and train personnel, partners, and beneficiaries.

In order to prevent and reduce the risk of sexual exploitation and abuse by employees of NGO:

- Management and HR must ensure a sound selection process when hiring all employees, especially those who will have direct or indirect contact with children.
- The CSO Code of Conduct and the CSO Security Policy (together with the CSO section on protection of children from sexual exploitation and abuse) are published, distributed and with those who cooperate with NGOs are properly informed.
- NGO employees are trained, in particular, on matters related to the Code of Conduct, ensuring security and the National Security and Protection of Children. In addition, employees with special responsibilities (for example, managers) will receive additional training that corresponds to their job duties.

In the case of information about persons who are or have been on preventive registration of offenders in the bodies of the National Police of Ukraine, are registered in a psychoneurological or narcological dispensary, have been in prisons or served alternative types of punishments, have been dismissed from their previous jobs due to manifestations of unethical behavior in relation to beneficiaries or colleagues, the organization does not involve them in work, partnership, patronage, volunteering or other activities. If such facts were not established during the selection of personnel or the start of activities with partners, but became known in the course of activity, the organization, in the presence of established facts, terminates cooperation with such persons.

The organization carries out educational work on the prevention and prevention of SEA with the staff, beneficiaries, implementing partners, through regular mandatory training, distribution of information materials.

Upon hiring, the staff must familiarize themselves with the Policy and sign it informed consent to comply with its provisions (Appendix1).

As training in combating SEA, the organization can use existing certified programs offered by UN agencies and recognized international organizations with which it has experience in partnership, such as the United Nations Children's Fund (UNICEF).

The organization envisages the obligation to inform the staff, beneficiaries and partners involved in the implementation of activities about the availability of reporting mechanisms regarding possible incidents of SEA.

After recruitment, the staff is informed about the availability of mechanisms for reporting possible cases of SEA immediately in the first week of work.

We inform the project beneficiaries and representatives of the affected population (conduct relevant trainings) once every 2 months or more often as part of other trainings.

The organization's staff is reminded of the procedures of the reporting mechanisms for possible cases of SEA every month.

The NGO guarantees that, subject to participation in partnership relations, sub-grant and sub-recipient contracts:

1. contain appropriate wording requiring the specified organizations and individuals as parties to the agreement, as well as their employees and volunteers to adhere to a code of conduct that meets the standards of this policy (Appendix 2); and
2. definitely indicate that if organizations or individuals do not take preventive measures against child abuse and child abuse, do not investigate and report cases of child abuse, or do not take measures to correct situations of child abuse and child abuse, then this is a reason for termination of such agreements by the NGO.

The CSO ensures that available sexual exploitation and abuse reporting mechanisms are in place, and that CSO complaint coordinators understand how to properly perform their duties. This notification mechanism should not be separate, parallel to other structures for receiving complaints and appeals by the system in this field, but should be linked to existing structures and build on them, to create a unified system for responding to feedback and complaints.

The NGO involves local communities and state administration and authorities in the processes of prevention and response to sexual exploitation and violence. In particular, local communities should be consulted to take into account both cultural and gender aspects when developing a mechanism for interaction and response at the community level (CRM).

Distribution of roles and responsibilities

- The NGO management and project managers are responsible for this Policy and its implementation.
- All employees, volunteers, partners and other representatives of the NGO are obliged to adhere to this Code of Conduct of the NGO and other key policies, including the PSEA Policy, at all times (that is, also during non-working hours).
- All NGO employees are required to report any suspicions of sexual exploitation, harassment or harassment of others. If the information has been given in confidence, this can be done without providing details of the case. Failure to report suspected abuse of anyone is a violation of GO policy and may result in disciplinary action.
- The authorized person on the issues of SEA of the NGO is responsible for informing the employees of the NGO, involved specialists, beneficiaries about the issues of SEA, develops and implements plans to increase the awareness of the issues of SEA of the employees of the NGO, ensures the functioning of the feedback mechanism in cases of SEA, contributes to the investigation of cases of SEA, if any took place and contribute to receiving psychological help for victims of SEA, performs other actions in accordance with their functional duties (Appendix 3).

Liability for violation of the principles of this Policy

The NGO undertakes to properly consider all cases and suspicions of SEA in accordance with the procedure of response to SEA, and to assist in the submission of the relevant application by the affected person to the law enforcement authorities, if he expressed such a desire.

When considering cases of SEA, the organization adheres to the principle of confidentiality. Confidential information obtained by any employee in the course of a case may not be disclosed to others unless required by law.

Manifestations of prohibited behavior, abuse of one's position, which this policy provides for, in particular, sexual exploitation and abuse, are grounds for disciplinary responsibility of employees. Relevant provisions for regulating this issue are included in all labor contracts of employees, including individual – entrepreneur and CPC contracts.

The organization has the right to apply contractual sanctions, including the termination of contracts for the provision of services or the supply of goods with suppliers in case of violations of the Policy on their part. Appropriate provisions regulating contractual sanctions are included in all contracts with suppliers of services and goods.

Policy on prevention of sexual exploitation and abuse

The mechanism of consideration and response to cases of SEA

In the event of cases or suspicions of the commission of SEAS, the employee of the organization is obliged to immediately, in an arbitrary form or according to the established form (Appendix 4), notify the authorized person for SEA issues – Iryna Yatsyk, in person or by e-mail, if desired, anonymously at fprofuturo@gmail.com. Iryna Yatsyk is a responsible person in our organization for working with children. She is a methodologist of educational programmes for children, youth and adults, who also is responsible for PSEA sector.

The notification from the employee must contain a reflection of the facts and circumstances of the events, and as well as personal data (if available) of the suspected offender and the victim.
All cases and/or suspicions of SEA, including anonymous ones, are treated individually and confidentially, in accordance with the Procedure for reporting, reviewing, and investigating SEA cases (Appendix 5). Reporting procedure is mandatory.

The organization creates, maintains, and disseminates information about the availability of message reception channels: written complaint, phone number for messages with hours of operation, email address.
The authorized person constantly checks the presence of messages and records all received messages, including anonymous ones, in a separate log (Appendix 6). The journal is a document of strict reporting and is kept in the organization's safe.

When such a case of SEA is reported, PRO FUTURO FOUNDATION immediately provides the affected person with contacts of organizations that are qualified to investigate SEA. Referrals are made immediately and are made regardless of whether the violation has been proven. The initial assessment will be carried out by a specialized organization qualified to investigate SEA.

NGO redirects appeals regarding SEA to other competent authorities, in particular law enforcement agencies, medical institutions, social services, etc., if the victim needs qualified assistance from other specialists, according to the form (Appendix 7). As part of the investigation, interviews of the persons who made the report, victims, witnesses, and subjects of the investigation may be conducted, necessary to clarify the circumstances. The persons involved in the survey sign an informed consent to participate in the investigation. The personal data of persons who make a report and are involved in the investigation are treated as strictly confidential.
All persons involved in the review of the report sign a non-disclosure form details that may harm the injured person.

The authorized person, within the framework of his powers, provides the injured person with the necessary information about the possibility of receiving psychological, legal, medical, and other assistance.

Mechanism of response to cases of SEA

The reporting procedure is mandatory.

If the report is not substantiated and the policy violation is not substantiated, Go will not take any disciplinary action against the accused.

If the conclusions of the investigation indicate evidence of violations of the Policy, or if the subject of the investigation himself admits guilt, the employee is dismissed.

If the confirmed cases concern partner organizations, involved experts, donors, benefactors, patrons, volunteers and other persons, cooperation with them is terminated.

If the report contains signs of a criminal offense, it is sent to the appropriate law enforcement agencies, regardless of the conclusions of the internal investigation, but subject to the informed consent of the adult victim.

If the report concerns a child, the children's service and law enforcement agencies are notified immediately within 24 hours, regardless of the results of the internal investigation.

Appendix 1

Approved By
order of the Chairman of the
Board
PRO FUTURO FOUNDATION"
dated September 22, 2022 No. 4

_____

Receipt

From a member of the Public Organization
"Non-govermental organisation
"PRO FUTURO FOUNDATION"

_____
Full name

I,_____,
a member of the Public Organization "Non-Governmental Organization "PRO FUTURO FOUNDATION", I confirm that I have read the Code of Conduct of the NGO "NON-GOVERNMENTAL ORGANIZATION "PRO FUTURO FOUNDATION", an integral part of which is the Policy on the Prevention of Sexual Exploitation and Abuse (SEA) in the edition of September 22, 2022 in the Ukrainian language in the original. I confirm that I will be guided in my activities by the norms of the NGO Code of Conduct, will attend events to raise awareness of SEA issues, and will promptly report SEA cases, if they occur.

I understand that in case of violation of the Code of Conduct of the NGO "NON -GOVERNMENTAL ORGANIZATION
"PRO FUTURO FOUNDATION", in particular the Policy for the Prevention of Sexual Exploitation and Abuse (SEA), I can bear responsibility, in the form of exclusion from the Public Organization and termination of any legal relationship with me.

"____»_____202_ . _____ _____
Signature Full name

Appendix 2

Approved By
order of the Chairman of the
Board
PRO FUTURO FOUNDATION"
dated September 22, 2022 No. 4

Obligations to comply with the Policy of SEA of the NGO in the agreements/contracts of the NGO "PRO FUTURO FOUNDATION"

Partner is obliged:

- In your activities within the scope of project implementation, adhere to the norms, principles and rules for the prevention of sexual exploitation and exposure (hereinafter referred to as " SEA") defined by the Partner's SEA policy, or if there is none, be guided by the approved SEA Policy of the NGO "NON-GOVERNMENTAL ORGANIZATION "PRO FUTURO FOUNDATION".
- To acquaint the employees of the organization/institution, which should be involved in the implementation of the project, with the principles and mechanisms of prevention of sexual exploitation and abuse in accordance with the approved Policy of SEA NGO "NON-GOVERNMENTAL ORGANIZATION "PRO FUTURO FOUNDATION".

In particular, familiarize your employees and beneficiaries with the NGO's feedback mechanism.

- Ensure that the Partner's employees and/or involved experts take the online course "Prevention of Sexual Exploitation and Exposure" before starting activities within the project at the following link: https://agora.unicef.org/ and provided appropriate certificates of completion of the course to the manager of the NGO responsible for SEA.
- Inform the beneficiaries who will receive assistance/services within the scope of the project about the principles and norms of the SEA, distribute informational materials (bulletins, banners) on the topic of SEA.
- To collect and promptly transmit information on cases of emergency situations, if any, during the implementation of the project. Contact e-mail the post of the manager of the NGO responsible for SEA for messages: fprofuturo@gmail.com
- In the case of detection of precedents of violations by the partner's employees/involved specialists of the norms and rules of the SEA NGO Policy, the partner is obliged to apply disciplinary measures against the violators, in particular to suspend the violator from the implementation of activities within the project and to assist law enforcement authorities in carrying out investigative actions against the violator. In the case of cases of violations of the rules and regulations of the NGO's SEA Policy by the partner's employees/involved specialists, the NGO reserves the right to terminate cooperation with the partner.

NGO is obliged:

- To provide the partner with comprehensive information and documents regarding the norms and rules of the Policy of the NGO regarding SEA. Notify about changes in the CSO Policy and the feedback mechanisms of the CSO regarding cases of CSO.
- Involve the partner's employees/involved specialists in the educational activities of the NGO regarding the SEA and inform the partner in advance about the conduct of such activities.
- To provide consulting support to the employees/involved specialists of the partner regarding the implementation of the SEA, as well as informational and methodical materials.
- Consider complaints and respond to precedents of violations by the partner's employees/involved

specialists of the norms and rules of the SEA NGO Policy and inform the partner about the results of complaints and precedents.

Appendix 3

Approved By
order of the Chairman of the
Board
PRO FUTURO FOUNDATION"
dated September 22, 2022 No. 4

Functional responsibilities of the Authorized Person in matters of SEA
NGO "PRO FUTURO FOUNDATION"

Terms

1. Authorized person on SEA issues:
2. It is guided in its activities by the Code of Conduct of the NGO "NON-GOVERNMENTAL ORGANIZATION "PRO FUTURO FOUNDATION", an integral part of which is the Sexual Exploitation Prevention Policy (SEA);
3. Provides support to the management in the performance of their duties related to SEA;
4. Informs the management about problems or difficulties in the implementation of the SEA;
5. Receives reports of allegations of SEA and coordinates response to such incidents;
6. Together with the HR manager, he/she conducts training and raises the awareness of the staff and other persons who cooperate with the organization, regarding SEA;
7. Coordinates efforts with other relevant participants in the SEA process, including interagency efforts.

The main functional duties of the authorized person on the issues of SEA

- Acquaints all employees of the organization with the Code and informs them of their obligations regarding the need to comply with it;
- Conducts events/working meetings with employees/involved experts of the NGO on issues of social security, provide relevant consultations;
- Ensures informing the beneficiaries of the NGO and the public about the issues of SEA;
- Ensures the operation of the feedback mechanism of employees and beneficiaries of the NGO regarding cases of SEA, as well as the response mechanism to complaints regarding SEA;
- Performs and coordinates information work with implementing partners, service providers and other third parties regarding the requirements of the Policy.
- Collaborates with the organization's staff on aspects related to SEA, including ensuring that all staff sign a code of conduct and that screening for
- SEA has been a regular part of the recruitment process in the past.
- Facilitates awareness-raising campaigns among beneficiaries and local communities regarding the definition of the term "SEA", the standards of conduct expected of NGO staff and the various mechanisms for reporting allegations of SEA or suspected SEA, including providing contact information for referral such appeals.

Policy on prevention of sexual exploitation and abuse

Mapping list of victims assistance services

You can report threats to life and health, as well as violence, to Polish institutions that provide protection and support.

Police telephone no: **997.**
Free domestic violence hotline of the police: **800 120 226** (open from Monday to Friday from 9:30 a.m. to 3:30 p.m.).
Emergency telephone number (for all EU countries): **112.**

The National Emergency Service for Victims of Domestic Violence "Blue Line" has a 24-hour free information line: **800 120 002.**
The service provides counseling in English every Monday from 18:00 to 22:00, and every Tuesday from 18:00 to 22:00 in Russian.

You can also contact the service via e-mail at **blukalinia@niebieskalinia.info.**

Child helplines 116 111 (FDDS) and 800 12 12 12 (Commissioner for Children's Rights).

IPZ Warsaw Blue Line

The information line is open daily from 12:00 to 18:00 by phone: **22 668 70 00.**

E-mail: **pomocnia@niebieskalinia.pl**

For those who call, the line can provide translation services!

Centrum praw kobiet Foundation

The offices of the Center for Women's Rights are located in:
- Warsaw,
- Gdańsk (counseling in Ukrainian/Russian),
- Krakow (counseling in Russian),
- Lodz,
- Poznan,
- Toruń,
- Wroclaw,
- Zyrardow

A round-the-clock hotline is available from Monday to Friday from 9:00 a.m. to 5:00 p.m: 600 070 717, information line: **22 622 25 17.**

You can also use the e-mail address: **pomoc@cpk.org.pl.**

Feminoteka Foundation

The foundation's information line is available: **888 88 33 88.**

Consultations are available from Monday to Friday from 8:00 to 20:00.

Emails are accepted at **pomoc@feminoteka.pl.**

For consultations outside of working hours, a special application https://avonalert.pl/ has been created, and on the website, on the request "mapa miejsc pomocy dla kobiet doswiadczajacych przemocy" you will find a list of places of assistance to women in Poland.

MEDERI Foundation

From Monday to Friday, from 9:00 to 15:00, the foundation's information line is open at the numbers: **505 576 189 and 22 111 00 36.**

Inquiries can also be sent to the following e-mail address: kontakt@fundacjamederi.pl.

Charitable Foundation "STRONG"

Provides assistance to survivors of sexual violence after 02/24/2022.
Specialists will help you cope with the events and find options for rehabilitation.
How the fund helps:
- Qualified psychological assistance online (consultation or long-term therapy);
- treatment of physical consequences (only if you arrive in Ukraine for the period of medical care, visits to proven specialists in the fields of gynecology, dentistry, proctology, surgery, tests, etc. will be organized)

You can contact us if you have experienced sexual violence or coercion to sexualized acts:
- regardless of gender, age, religion, or orientation;
- regardless of the origin of the perpetrator (military or civilian).

You can refuse assistance at any stage.

Website of the fund: sylni.org

You can apply
- via the form : forms.gle/yLU1JSJQmYPWCb7s8
- by calling the toll-free number 0800202334

FOR THE MILITARY, VETERANS, AND THEIR FAMILIES:
"Veteran hub" platform

Support for military personnel, veterans and their families. Phone: **+38 067 348 28 68**
Department of medical and psychological rehabilitation for the military and their families, around the clock
Phone: **0 800 50 12 12**

SUPPORT IN WARTIME:

- Internet platform "Resilience Hub" Psychological assistance to victims of war
Website: **resiliencehub.com.ua**

- Platform "Women and War" psychological assistance to women
Telegram channel: **t.me/KaUrnvXRmhVIViB**

- Children's Voices Foundation Psychological support for parents and children during the war.
Phone: 0 800 210 106
Telegram channel: **t.me/kidsMentalHelpBot**

- UkrEdnist online platform for psychological assistance in wartime
Website: **ukr-ednist.com.ua**

CHILDREN, TEENAGERS, PARENTS:

- Charitable Foundation "Children of Heroes", assistance to children who lost their parents as a result of the war and their guardians
Website: **https://childrenheroes.org/**

- SateRoom psychological help for teenagers online

Website: **www.saferoom.org.ua**

- DOBRY START 738390204 Warsaw
Website: **www.dobry-start.pl**

- Project "Together"
Online and face-to-face psychological support groups for parents and adolescents
Website: **www.poruch.me**

- National hotline "La Strada" round-the-clock for children and young people under 25
Website: www.poruch.me ,
Phone: **800 500 225**

- "We are here for you" For children and parents 09.00 -20.00
Website: www.poruch.me,
Phone: **0 800 210 106**

Policy on prevention of sexual exploitation and abuse

The reporting system for SEA cases

Authorized person on SEA issues:

- Leads the development of internal procedures that allow staff to safely and confidentially report incidents of sexual exploitation and sexual abuse;
- Receives notification of allegations of SEA and related information, and coordinates actions in accordance with relevant procedures;
- Notifies the management of the NGO about problems or difficulties in the implementation of SEA.

Mechanism of response to cases of SEA

Authorized person on SEA issues:

- Upon receipt of a complaint about SEA, the NGO coordinates the response, including referral of persons affected by SEA to receive immediate professional medical and/or psychological assistance, and informing law enforcement authorities for further investigation of the case.

- Coordinates the activities of the NGO to ensure SEA with relevant organizations, including (if necessary) interdepartmental initiatives.
- If necessary supports the management in the implementation of other measures related to SEA.

Policy on prevention of sexual exploitation and abuse

Appendix 4

Approved by
the Order of the Chairman
of the Board
"PRO FUTURO FOUNDATION" NGO
dated September 22, 2022 No. 4

Internal report of sexual exploitation and/or abuse

Reasons of appeal:

- I witnessed a case of sexual exploitation and abuse (SEA)
- I have reasonable suspicions that the person is involved in sexual exploitation and exposure
- I have become a victim of sexual exploitation and violence

Please provide the facts that support your concern. If possible, indicate the date, time, place and circumstances of the events:

If you have become a victim of sexual exploitation and abuse, what urgent help do you need

- I need a medical help
- I need a psychological support and rehabilitation.
- I am looking for legal help to bring the guilty person to justice.
- I need financial help to cope with the consequences of SEA.

Other (specify):_____

Personal data: Full Name
Place of work and position
Contact information (if available)

Personal data: Full Name
Place of work and position
Contact information (if available)

Personal data of witnesses of the situation: Full name
Place of work and position
Contact information (if available)

Date_____Signature_____

The organization undertakes to keep the personal data of the author of the message confidential.

Appendix 5

Approved by
the Order of the Chairman
of the Board
"PRO FUTURO FOUNDATION" NGO
dated September 22, 2022 No. 4

Procedures for informing, reviewing and investigating cases of SEA

The procedure is used to consider internal, external, anonymous appeals according to a single algorithm, and exactly:

1. No later than 72 hours from the moment of receiving the notification, the project manager/authorized person on the issues of SEA must consider the appeal and contact the affected person to confirm receipt of the complaint.
2. If necessary, the project manager/authorized person on SEA issues can initiate the creation of a temporary commission consisting of at least three people for the administrative investigation of the case for further consideration of the received notification about the SEA case.
3. Within 72 hours after confirmation of the receipt of an application for SEA, the information is evaluated, taking into account an individual, confidential approach to the needs of the victim. Necessary qualified specialists can be involved to provide assistance to the victims.
4. The project manager / authorized person on SEA issues should refer suspected and substantiated cases of SEA and cases involving minor children and vulnerable adults in accordance with the legislation of Ukraine.
5. For a comprehensive assessment of the situation, the project manager/authorized person in matters of SEA should receive in writing the testimony of other persons who may have been affected by the SEA incident, or who became witnesses, and the explanation of the offender.
6. Guided by the Policy for the prevention of SEA, after objectively and impartially considering all the available facts, the project manager / authorized person on issues of SEA make decisions on measures of disciplinary responsibility of the offender within the limits of labor legislation and their powers (reprimand, dismissal).
7. The injured person has the right to receive information about the progress of the investigation procedure.
8. The applicant, the offender and the victim are necessarily informed of the relevant decision by the project manager/authorized person in charge of the SEA.

Privacy

All participants and witnesses of SEA cases must observe the principle of confidentiality during the entire process of submission and consideration of the appeal. Employees who violate the principle of confidentiality will be subject to disciplinary action in accordance with the legislation of Ukraine.

External appeal

Complaints about SEA cases received outside the Organization must be submitted and considered in accordance with this Procedure and according to the same algorithm as internal appeals.

Appendix 6

Approved by
the Order of the Chairman
of the Board
"PRO FUTURO FOUNDATION" NGO
dated September 22, 2022 No. 4

_____

Journal of documentation of cases of SEA

CONFIDENTIALLY:
the document contains confidential data that is not subject to publication and is stored in a separate closed archive.

1. Details of how, when and by whom the charge was received:_____.

2. A description of the alleged incident, including dates, times, and locations:_____.

3. A description of the intended or anticipated victims (eg, full name, age, gender, ethnicity/nationality, disability):_____.

4. Description of alleged perpetrator (e.g. full name, age, gender, nationality, organizational affiliation / position, previous record of wrong doing):

5. Activities undertaken by the organization in response to allegations received to date (e.g. directing assistance, conducting investigations,
notified the third parties): _____.

6. Activities carried out by other organizations or structures in response to it accusation: _____.

7. Requested support from partners (for example, providing support to victims of SEA, support): .
_____

8. Information about the persons to whom this report was sent: (name, position, contact information (e-mail, phone).

The report has been prepared:

Full name _____
Position_____
Date _____

Appendix 7

Approved by
the Order of the Chairman
of the Board
"PRO FUTURO FOUNDATION" NGO
dated September 22, 2022 No. 4

Redirection form for victims of SEA

The document is confidential and not subject to publication.

The sending organization:

Name	
Address	
contact person	
Contacts	

The organization that received

Name	
Address	
contact person	
Contacts	

Information about the victim:

Full name:	Country of registration:
Address:	Language:
Sex:	Identification code:
Age:	Contacts:

Policy on prevention of sexual exploitation and abuse

Redirection form for victims of SEA

The document is confidential and not subject to publication.

Information about the minor victim (under the age of 18):

Name of the guardian:	
Family connections:	
Is the child separated from the family?	☐ YES ☐ NO
Is the guardian informed about the referral?	☐ YES ☐ NO

The reason of referral:

Was the victim informed about the referral?	☐ YES ☐ NO
Was the victim referred to any other organization?	☐ YES ☐ NO
In additionandinformation:	

Necessary services for the victim:

Psychological support ☐	Financial Aid ☐
Social services ☐	Financial support ☐
Aid ☐	Educational services ☐
Legal protection ☐	Food ☐
Shelter/accommodation ☐	Support for children born as a result of SEA ☐

Policy on prevention of sexual exploitation and abuse

Redirection form for victims of SEA

The document is confidential and not subject to publication.

Consent to the transfer and processing of information:

I,_____(surname of the victim),understand that the purpose of direction and disclosure of this information_____(name of the host agency) is to ensure the security and continuity of service provision by their suppliers who seek to serve their client. Service provider,_____(referring agency name), clearly explained the referral procedure to me and listed the exact information that must be disclosed.

By signing this form, I agree to provide this information. Signature of the responsible person (victim or guardian, if the case concerns a child):

Date (DD/MM/RR):_____ Signature:_____

Other information:

Does the victim have special needs?	
Direction delivered by	☐ Telephone (only in case of emergency) ☐ Electronic mail Electronic means of communication (eg software application or database) ☐ Personally
Feedback is expected via	☐ Tel. ☐ E-mail ☐ Personaly (DD /MM /RR):
Transferred: Full name Date Signature	Delivered: Full name Date Signature

SIGNALING POLICY
PRO FUTURO FOUNDATION

Signaling policy

Introduction

All employees of the PRO FUTURO FOUNDATION (NGO) are required to report all known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behavior that are in direct violation of the Code of Conduct of the NGO and Key Policies of the NGO. Failure to provide information about violations of the above policies leads to the spread of behavioral principles that are dangerous and contrary to the principles and values of the NGO, as well as lead to the victimization of innocent persons. All complaints and concerns should be brought to the attention of the appropriate persons using the tools and channels described below, such as fprofuturo@gmail.com. In order to protect the rights of NGO employees andmaintain a decent work environment, free from any possible harassment, abuse and exploitation, NGO management undertakes to investigate all complaints and concerns expressed by NGO employees using the channels described below.

Who can raise concerns under this policy: full-time and part-time NGO employees, volunteers, interns, consultants, and individuals working on behalf of the NGO ("CEO Employees").

What to report:
Any serious issues or suspected cases of abuse,
exploitation,
harassment or other forms of unacceptable behavior that are in direct violation of the Code CSO behavior and CSO Key Policies, or which:

- make you feel uncomfortable from the standpoint of generally accepted standards;
- do not comply with the policy of the GO;
- below established standards;
- or is inappropriate behavior.

The above may apply to:

- *actions that are offenses or violations of the law or policies of the GO;*
- *racial, sexual, disability or other discrimination;*
- *suspected fraud, corruption and misuse of finances;*
- *causing harm to safety, health or the environment;*
- *insults, abuse, harassment;*
- *other unethical behavior;*
- *attempts to hide any of the above.*

This list is not exhaustive.

Basic principles

Privacy

PRO FUTURO FOUNDATION treats all complaints and disclosures confidentially and sensitively. The identity of the applicant remains confidential unless it interferes with the investigation process. Therefore, this Policy recommends that people include their name under complaints and alerts. As anonymous complaints and reports are less credible, the standard procedure cannot be fully applied to them.

Signaling policy

Protection

If a complainant makes a well-intentioned allegation that is not subsequently substantiated by an investigation, no action will be taken. However, if he/she intentionally makes a malicious or false allegation or otherwise abuses the channels described below, he/she will be subject to disciplinary action.

The complainant, the subject of the complaint and any other person assisting the investigation shall be protected from any form of intimidation, threats, reprisal or retaliation that may arise in connection with the alleged incident. If it is established that any employee of the NGO intimidates them, disciplinary measures will be applied - up to dismissal.

Due process of law

The rights of all parties involved in an internal administrative investigation should be respected and they should always be treated with respect for their dignity. All employees under investigation will be provided with:

- the full text of the notice of any formal charges brought against them an explanation of the
- investigation process
- an opportunity to explain and/or respond to any formal charges brought against them before disciplinary action is taken
- presumption of innocence throughout the investigation
- the right to a full, fair, impartial, thorough and objective investigation of the charge(s) without undue delay
- confidentiality during the investigation

Any intentionally false or malicious statements or allegations made against another employee or third party, refusal to cooperate (including breach of confidentiality) or improper interference with the investigation will be considered gross misconduct and will result in disciplinary or other appropriate action.

Duty to inform

The PRO FUTURO FOUNDATION Code of Conduct states that NGO employees are required to report all violations of the NGO Code of Conduct and Key Policies of the NGO. Complaints should be submitted using the channels described below. NGO approves the reversecommunication and will treat all complaints and notifications promptly, seriously and confidentially.

Notification channels for PRO FUTURO FOUNDATION employees

1. Standard notification channel

All complaints and notifications must be addressed to the direct manager of the person who filed the complaint.

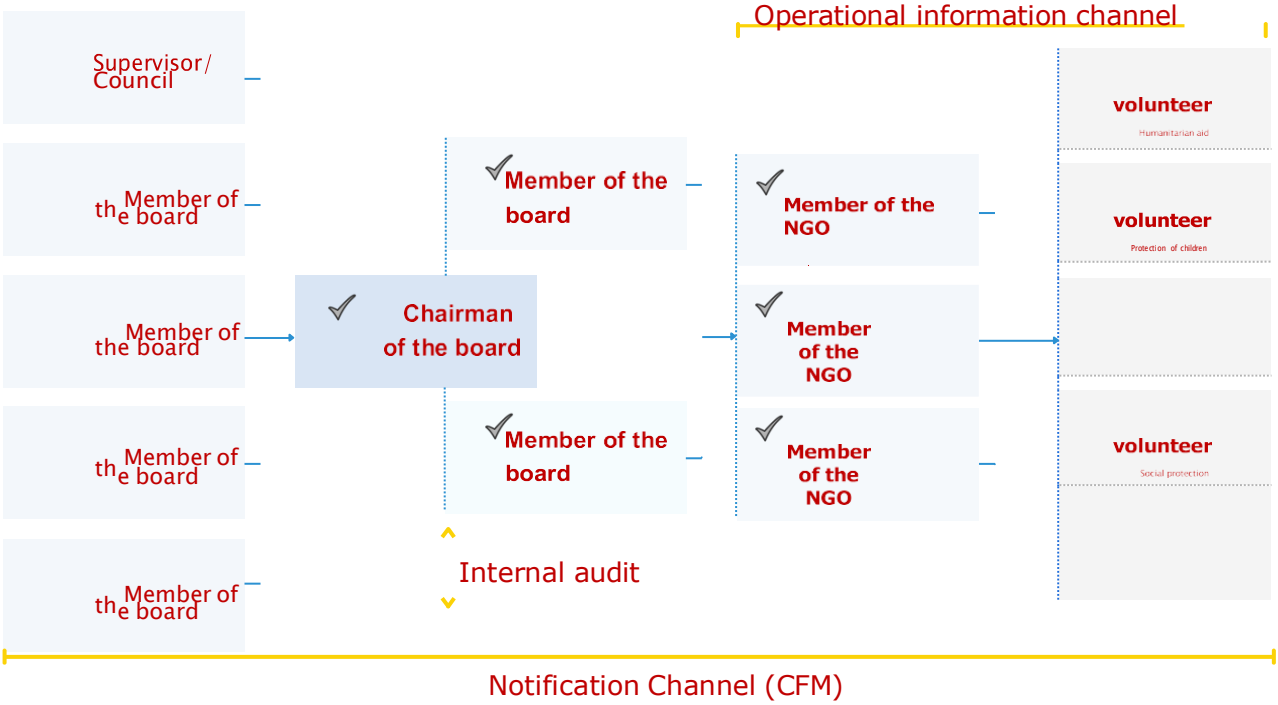
In the event that the complaint or notification does not come from an employee of the NGO (that is, from a partner or companion of the NGO, etc.), the employee of the NGO who received the complaint is obliged to act as the applicant, and the information must be transferred as soon as possible to his/her immediate supervisor (to one of the direct supervisors whom he/she trusts). Such information should not be intentionally withheld.

If the complainant cannot read or write, the immediate supervisor receiving the complaint will record the verbal complaint and read the recording to the complainant. The applicant will be asked to putfingerprint as a sign of your signature. The immediate supervisor will also have the independent monitor certify the complaint with his or her signature as evidence that it is an accurate record of the complaint.

2. The principle of corporate information and the notification channel

Complaints concerning the applicant's immediate supervisor should be directed to the supervisorof a higher rank, according to the scheme below.

In line with the NGO's open approach and the desire to address, rather than hide, various forms of unacceptable behavior, corporate whistleblowing is seen as an act of courage based on loyalty to the organization and its ethical principles. NGO employees are expected to use the principle of corporate disclosure before going public
to discuss their complaints outside the NGO.



3. Sexual exploitation and abuse reporting channel

If the complaint involves sexual exploitation and abuse (SEA), a female or male manager, depending on the complainant's gender, should be consulted, even if not her/his immediate supervisor or, if applicable, the SEA Coordinator.

4. Fraud alert channel

All complaints and fraud alerts should be fprofuturo@gmail.com. This channel, which connects employees directly with senior management at headquarters, facilitates the detection of financial abuses that, if they occur, could harm the NGO or any of its stakeholders. The preferred language of communication is English, but complaints can be submitted in any language. Senior management, in consultation with the Internal Auditor, will make a decision on the merits of the complaint/alert.

5. External notification channel

If other standard means of communication are inconvenient, impractical, or have been exhausted, concerns about serious internal incidents of unethical, unsafe, or illegal practices should be directed to fprofuturo@gmail.com. This channel, which links employees directly to HR at headquarters, makes it easier and faster to identify patterns of behavior that, if they occur, could harm the NGO or any stakeholder. The preferred language of communication is English, but complaints can be submitted in any language.
The HR department, in consultation with senior management, will make a decision on the merits of the complaint/alert. When considering complex complaints, they may decide to transfer the decision-making process regarding the complaint to an external independent organization.

6. Box for complaints and suggestions

If a person wishing to make a suggestion or lodge a complaint finds the above channels unsatisfactory, they can use a locked box placed on behalf of the headquarters where all those wishing to access it can do so in the most confidential and private manner possible.
Headquarters staff will be notified by email of the box's location. The box for complaints and suggestions will be opened twice a month employees of the personnel department. Every month, one of the employees fills in the Accounting Journal after opening the box (see Appendix 1).
The head of the personnel department will keep a record.
Enter complaints and suggestions in the proposal form - Appendix 3. Such a form will also be located next to the box. All HR staff who open the box must sign a Confidentiality Commitment (Appendix 2).

Notification channels for PRO FUTURO FOUNDATION beneficiaries

PRO FUTURO FOUNDATION recognizes that the most important aspect of accountability is to give project beneficiaries and stakeholders the opportunity to demand a response to complaints and probable task of harm and receiving a given reaction.
Thus, the beneficiaries of CSOs are encouraged to leave their complaints, comments and feedback through the Community Feedback and Response Mechanism (CFM). Such a formal mechanism, described in the CFM policy, is provided to CSO beneficiaries and stakeholders a safe, accessible and effective channel for project parties to submit complaints and suggestions, as well as to receive a response or compensation, and allows the NGO to see the project through the eyes of the beneficiaries.

Duty to investigate

The management of the NGO mission and senior management in Zhytomyr are responsible for responding to any complaints addressed to them through the above channels. Their response to a complaint must result in a confidential, accurate, thorough and prompt internal administrative investigation in accordance with the principles set forth in this policy. All employees of the NGO must fully and conscientiously contribute to the internal administrative investigation.

Signaling policy

Range of internal administrative investigation

An internal administrative investigation will be conducted into the following allegations (among others):

- Financial fraud, corruption
- Failure to comply with legal obligations and norms
- Harm to health, safety and the environment
- Causing insults, abuse, harassment
- Sexual exploitation and insult
- Criminal activity
- Indecent, unethical and unacceptable behavior contrary to the Code of Conduct of the NGO and other policies at the level of the organization or department
- Attempts to hide any of the above
- This listis not exhaustive.

After receiving a complaint through one of the above channels the provisions of the Investigation Manual should be followed.
It should be noted that an internal administrative investigation does not replace a criminal investigation. In cases where there is suspicion of committing a criminal offense, there will be the issue of informing state authorities was raised.

Investigation Manual

The investigation manual should be used as a practical guide for all managers/unit leaders who receive a complaint, as well as for senior staff from investigation for the purpose of conducting an internal administrative investigation accusation against NGO employees or any person working for or on behalf of the NGO. It contains detailed information on the methods and procedures of the investigation of the NGO.
For more information on investigative principles, see Investigation Manual.

PRO FUTURO FOUNDATION's response to violations

In case of significant violations of the Code of Conduct of the NGO and the Key Policies of the NGO, the NGO immediately takes action

Full-time or part-time employees of NGOs	disciplinary measures up to dismissal
Volunteers and trainees of the NGO	taking measures, up to termination of the contract
NGO consultants	termination of the contract
Visitors of the NGO	taking measures, up to the termination of visiting support
Partners of the NGO	termination of the contract
NGO partner organizations	taking measures, up to the termination of funding or support and/or termination of the partnership agreement

Signaling policy

Support from PRO FUTURO FOUNDATION headquarters

Investigations can be inherently complex, stressful and stressful for all parties involved. For this reason, the NGO undertakes to provide ongoing support to all parties participating in the investigation.

Recommended for employees who need help and guidance in the investigation process turn in:

- Legal Department (fprofuturo@gmail.com) on all legal issues related to the investigation.
- Human Resources Department (fprofuturo@gmail.com) on all personal and personnel issues related to the investigation. If it is necessary to request professional psychological support during the investigation, you should also contact the HR department.
- To the top management (fprofuturo@gmail.com) on any other serious matter.

Requests can be made in any language - translation will always be provided.

Appendices

Appendix 1: Box for complaints and suggestions / record book

No	Opening date	The names of the employees of the personnel department who opened the box	Contents/Details

Appendix 2: Form for acceptance of the obligation to observe confidentiality

I undertake to exercise maximum discretion during my participation in the opening of the complaint and suggestion box established by headquarters. I will keep confidential any information that comes to my knowledge as a result of my participation in opening and reviewing the contents of the complaint box
and offers, I will not discuss any information obtained thereby with anyone except persons authorized to receive it.
I understand that this statement will remain in effect after my participation in the process is complete. I also understand that the disclosure of confidential information to persons not authorized to receive it may amount to a criminal offense and that a signed original of this declaration will be kept in a binder of documents related to the case.

Name_____Position_____

Signature:_____Date and place:_____

Appendix 3: Proposal form

Date	
Full name (optional)	
The person or program to whom the suggestion, feedback, or complaint may apply	
Your complaint (please provide as many details as possible. Please write on the back of this sheet if you wish to provide more details)	
Do you have any proof of these facts? (If so, please list them here)	
Do you want an answer? (if so, please provide your contact details. You can remain anonymous, but this may limit our ability to investigate)	
Full name:	
Contacts:	

SECURITY POLICY
PRO FUTURO FOUNDATION

Security policy

Terms of use

PRO FUTURO FOUNDATION's health and safety policy fully applies to all full-time and part-time employees of the NGO, volunteers, interns, consultants, visitors and persons acting on behalf of the NGO (hereinafter "Employees of the NGO"). This policy does not apply to NGO partners, i.e. partner organizations and suppliers.

Introduction

PRO FUTURO FOUNDATION (NGO) is committed to minimizing risks to the safety and security of all its employees and to take all necessary measures to ensure that employees are trained and instructed, receive technical support and have information to reduce the likelihood of putting them at risk and at the same time maximize the effect of our programs. GO strives to provide safe and healthy working conditions for all employees, taking into account the fact that each individual employee is also responsible for achieving this goal.

In particular, under conditions of critical circumstances with a high degree of risk, the safety concerns and minimization of risks to employees should be given paramount importance in management decisions above all other considerations.

At the same time, the NGO strives to minimize any possible negative consequences of our actions for our beneficiaries. The main principles of this approach are formulated in a separate Policy of the NGO "Do No Harm".

Key security strategies and principles

NGO recognizes three main security strategies:

- ***Acceptance and integration into society***

A fundamental element of effective security management is recognition by our beneficiaries and the communities where we work. This is best achieved when NGOs and staff are well integrated into local society and valued for their contribution to local development and/or humanitarian aid. The general approach of the NGO, the development of programs and the behavior of NGO personnel will be based on an approach of acceptance and the principles of transparency, accountability, respect and compassionate treatment of beneficiaries, local authorities, partner organizations and other stakeholders.

- ***Protection measures***

While the recognition approach provides the basis for effective security management, it cannot completely eliminate all security threats. In volatile situations, appropriate security measures should be taken (such as unarmed security, security of offices and boarding houses, improved communication equipment).

- ***Force measures as the last measure***

Under conditions of extremely high risk, forceful measures (such as armed guards or suspension of activities) may be taken, but only on the basis of the written consent of the Chairman of the Board of the NGO.

The following key principles are related to this:

- ***The priority of human life***

PRO FUTURO FOUNDATION recognizes the priority of human life over any material values, and therefore no employee should put his own life or the lives of others at risk in an attempt to protect the property, equipment, financial resources, documents or infrastructure of the NGO.

- ***Ratio of risks***

The achievable results of our activities must always outweigh the risks incurred. This ratio must be constantly checked and revised, especially when developing programs in new countries and regions or when there are significant changes in local security dynamics. Activities in programs where the security risks are disproportionate to the potential benefits should be prevented and discontinued. Potentially life-threatening measures will be carried out only if their result is likely to save the lives of the beneficiaries.

- ***Precautionary activities***

The decision to evacuate, retreat or prohibit travel to the area can be made at any level of management and will always be approved by the higher level(s) of management. Such a decision can be overturned only in a situation where evacuation or retreat would cause significantly higher risks than inaction.

- ***The right to refuse***

NGO employees must always be informed in advance and prepared for the risks of each specific mission, and by accepting the mission, they accept its risks. NGO employees, however, have the right, without being subject to disciplinary action, to refuse to implement, participate in an event or travel if they believe that they are putting their safety or the safety of their immediate family at an unreasonable risk.

Distribution of roles and responsibilities

Distribution of roles and responsibilities of management

- *Duty of care*

The main function of the management staff of the NGO is the effective management of security and safety. Management at all levels of the organization has a responsibility and accountability for ensuring that organizational responsibilities of care for its employees, as well as the CSO's health and safety policies, standards, plans and procedures, are well integrated at all stages of planning, design, development and implementation of NGO programs.

- *Integration of security management into program management*

Safety and security should be fully integrated into the program development, management and decision-making process and should not be seen as a separate function. Security and safety management is fundamentally about good program management. The types of programs implemented by the NGO and the methods of their implementation will affect the risks to which employees, beneficiaries and partners of the NGO are exposed, in turn, these risks will affect the types of programs implemented.

- *Preparation of the safety management plan*

The security situation, trends, risks, and threat levels in the countries of operation of the NGO will always be monitored and documented, as they can significantly affect the strategic planning process. The management of the NGO sets its task to develop adequate strategies and procedures to reduce the identified risks and threats. The SMP must develop specific measures and plans to reduce risks, procedures for ensuring protection and security; as well as the roles and responsibilities of the assigned personnel based on a detailed risk assessment.

- *Risk information*

The management of PRO FUTURO FOUNDATION must ensure that all employees are properly informed about existing risks and their informed acceptance, as well as sufficient information about risk reduction strategies. There should be a risk assessment algorithm brought to the attention of all employees as part of their introduction to the course of duties.

- *Provision of training*

NGO will provide all employees with the opportunity to undergo training and education, receive the necessary resources and support, so that they can effectively perform their duties and work in their areas of activity safely.

- *Adequate staffing and division of duties*

The Supervisory Board of the NGO bears full responsibility for the implementation of security issues. In highly volatile and challenging circumstances, the CSO will make efforts to recruit a dedicated security officer at the country level, while a security coordinator will be assigned to each office. Security Officers and Security Coordinators will monitor and consult on security and safety issues, develop and implement security procedures, and assist in the integration of security and safety measures into program activities. The board of the NGO supervises the security consultant(s), who perform advisory functions and do not have managerial responsibilities.

- *Adequate funding*

The management of the NGO will allocate adequate funding to ensure security and safety. All funding proposals in high-risk countries should include a budget for safety and security, as most major donors not only approve, but even expect sufficient funding for safety and security measures.

Distribution of roles and responsibilities of personnel

- *Safety is everyone's concern and business*

Employees of the GO must actively participate, contribute and adhere to measures to ensure safety and security, be vigilant in matters of security risks and team safety. NGO staff must provide reasonable support for the security and safety of our implementing partners and beneficiaries and coordinate with other humanitarian organizations.

- *The result of individual actions*

All NGO employees are responsible for their own safety and security and must use common sense to keep themselves safe. At the same time, NGO employees are responsible not only for the consequences of their actions, which will affect themselves, but also for the protection and safety of their colleagues, beneficiaries, for the programs of the NGO, its reputation and assets, and in some cases for the consequences for others humanitarian organizations.

- *Respect for the Code of Conduct of the NGO and local culture*

Employees of the NGO will always act in accordance with the principles formulated in the Code of Conduct of the NGO. CSO staff will also seek to understand the local culture and behave respectfully towards its cultural norms, as violating them can often increase the threat to themselves or the organization.

- *All safety incidents must be reported*

All employees are responsible for reporting any security incidents, errors, threats and significant events to the appropriate management level as soon as possible. Even a seemingly insignificant threat cannot be underestimated.

- *Compliance with security procedures*

Compliance with safety procedures is mandatory. Failure to follow safety protocol can jeopardize not only personal safety, but also the safety of the entire team. This can increase the risk of harm to NGO personnel and assets, and can reduce commitment to NGOs by host governments, communities and beneficiaries. A serious violation of the CSO Health and Safety Policy may result in severe disciplinary action, including immediate termination.

- *Proper introduction of personnel to the course of duties*

All NGO employees will have access to and understand the NGO Health and Safety Policy, standards, procedures, related tools and manuals. This will be included in the initial training and briefings given to all employees and a signed confirmation of the training will be kept in the Human Resources (HR) department(s).

Health and safety

Obligations PRO FUTURO FOUNDATION

PRO FUTURO FOUNDATION (NGO) will maintain working conditions that are safe for life and health, provide and maintain appropriate equipment and mechanisms, ensure safe storage/use of substances and, if necessary, provide personal protective equipment. The NGO also takes measures to comply with relevant occupational health and safety regulations, including fire prevention. It is necessary to ensure the dissemination of information about the actual regulations and procedures and compliance with these regulations among all employees involved.

Health and responsibilities of the employee

Whenever necessary and possible, the NGO will assess the suitability of employees for work prior to their employment, through a preliminary medical examination. During the entire period of work of international employees, the NGO will provide them with remote counseling services on issues of physical and mental health. Consulting services are provided on a voluntary basis, depending on the employee's decision; in certain situations, the management of the NGO reserves the right to make the use of these services' mandatory. Even though NGO will do everything possible to ensure a safe and secure work environment, all employees are fully responsible for their own health.

Vaccination

All international employees of the NGO are required to be properly vaccinated in accordance with the vaccination policy of the visiting country or applicable to the visited country, as well as in accordance with the basic principles of the NGO in force in the country. The NGO will cover the cost of these vaccinations, but the employee remains responsible for obtaining the relevant vaccination or renewing it until it expires. The map of preventive vaccinations must be constantly updated.

Health care plans for specific countries

Individual health care plans should be developed for each country. They should include guidance on access to quality medical care, medication and treatment, emergency medical care, domestic and international medical evacuation, and a sexual assault response plan.

Other specialized guidelines and regulations by country

In addition to the procedures outlined in the medical care plans, procedures should be developed and properly implemented for other emergency situations, in particular, related to safety during travel, fire evacuation, repeated or possible natural disasters, and other significant incidents.

Security policy

First aid

First aid kits must be available in all offices and vehicles of the NGO. The management of the NGO must ensure that every employee of the NGO takes a course in first aid and undergoes regular retraining every two years.

Work methods

Analysis of threats in the country/region

The NGO assesses the level of threats to the employees and assets of the NGO in the countries and regions of the missions using a three-level rating:

- Red (critical situation with a high degree of risk, targeted attacks on humanitarian workers)
- Orange (unsystematic unstable position)
- Green (fairly safe)

The requirements for security standards and protocols in each specific country will be adjusted accordingly.

Ban on the use of firearms

The use of firearms and other weapons on the territory of objects and in vehicles of the NGO (including rental ones) as well as by the NGO staff is inadmissible. NGO employees are prohibited from carrying or using firearms. The presence of firearms, weapons of any other type, or the presence of armed personnel at any facility and vehicle of the NGO is prohibited, except in cases of immediate threat to life or if the proper approval procedure for ensuring the protection of personnel and property of the NGO was followed before that. The GO will use armed escort and security only in extreme cases, at the request of local authorities in order to support life-saving missions.

Use of mass media and social networks

Reckless and uncontrolled interaction with the media and the use of social networks can endanger the safety of employees, partners, beneficiaries of NGOs and/or the implementation of programs. Interaction with the mass media can be carried out only by authorized persons, while social networks must be used to a limited extent and in compliance with the Media Policy of the NGO. It is strictly forbidden to transmit confidential information through social networks or other channels in the event of security incidents involving employees of the NGO.

Responsibility

Although PRO FUTURO FOUNDATION strives to ensure the safety of its employees, it must be recognized that there are many variables beyond the control of the NGO that may affect the welfare of its employees; it must be taken into account that it is impossible to eliminate all the risks associated with the activities we carry out in the places where we work.

Supporting and accompanying documents

1. Personnel management policy of the NGO.
2. Annual training plan for the organization's personnel on prevention of sexual exploitation and exposure.
3. Staff training program on prevention of sexual exploitation and exposure.
4. A plan to increase the awareness of the organization's employees regarding the prevention of sexual exploitation and exposure.