

COMI Code of Ethics

The COMI: Mission and Vision

COMI is a non-governmental organisation, composed of professionals and volunteers who lend their commitment and expertise to implement projects in developing countries and in Italy. It was born in 1973, out of the experience of the secular institute "Cooperatrici Oblate Missionarie dell'Immacolata" (C.O.M.I.), which, welcoming the desire of young lay people to offer their time in favour of the poorest, gave life to a voluntary organisation (the COMI, not to be confused with the C.O.M.I.) to give space to the common action of people who recognise themselves in the communion of universally shared values and principles and objectives to pursue. The following year it joined FOCSIV, the Federation of Christian Organisations International Voluntary Service, and obtained recognition from the Ministry of Foreign Affairs. In 2016, it is recognised as a CSO - Civil Society Organisation - by the Italian Agency for Development Cooperation.

COMI's *mission* is to take charge of the integral development of Man in the world's poorest countries, promoting their autonomous and conscious growth, respecting their cultural diversity and promoting the equal exchange of values. COMI's *vision* is a world that has overcome poverty in its many forms with the weapons of sharing and solidarity, lived in the work of the people, removing the causes that generate injustice, in effective implementation of the Gospel message.

Context of the Code of Ethics

This Code of Ethics expresses and regulates COMI's intervention strategy, its action and the conduct of its members, volunteers, cooperators, administrators, employees and collaborators, both in Italy and abroad.

If, on the one hand, the application of the code of ethics does not presuppose any confessional adherence, on the other hand, the values of Christianity are an integral part of the context in which this code originated, because of their guiding role in the moral growth of the body. By way of example, four documents are cited, which can be placed - the first two - in the period around the birth of the COMI and - the other two - in the present:

- *Populorum progressio* (Pope Paul VI's encyclical of 26/3/1967),
- *Evangelii nuntiandi* (Apostolic Exhortation of Pope Paul VI of 8/12/1975),
- *Laudato si'* (Pope Francis' encyclical of 24/5/2015),
- *Brothers all* (Pope Francis' encyclical of 3/10/2020).

From the point of view of the relationship between the COMI and other organisations, the contents of the Code incorporate the "Code of Ethics and Conduct" of the Italian Agency for Development Cooperation (www.aics.gov.it), which completes what is not expressly provided for here. In the same way, the Code acknowledges the "Code of Conduct for the prevention and contrast of harassment, abuse and sexual exploitation for the protection of the dignity of the beneficiaries of development cooperation interventions and of the persons working and operating in the structures of the Italian Agency for Development Cooperation and with the Agency itself" (PSEAH Code - *Protection from Sexual Exploitation, Abuse and Harassment*" - www.aics.gov.it).

The code of ethics consists of values, principles and rules. It can therefore be used both, starting from the rules, to trace their inspiring principles to be reapplied in any new areas, and, starting from the principles, to frame the intervention strategy from an ethical perspective.

Values

The COMI attaches value to:

- **truth**, understood as the adherence of the necessarily imperfect worldview to the world itself;
- **the possible**, understood as a dream to be realised and an unexpected reality to be welcomed;
- **capacity**, understood as the yardstick of development: what individuals, and consequently social groups and states, are capable of being and doing;
- **culture**, understood as space and tools granted to curiosity and creativity;
- **diversity**, understood as an opportunity for exchange, relationship, confrontation and harmony;
- **responsibility**, understood as an awareness of being part of the common human nature and the common, wider, living nature, which commits one to broaden the perimeter of what is to be preserved and defended;

- **peace**, understood as the absence of divisions between people, whether political (borders) or social;
- **trust**, understood as the building material of society, where each person trusts in what they receive and is trustworthy in what they give.

Finally, **love**, towards others, humanity and the world, at once the origin and completion of all other values.

General Principles

- **research principle**: COMI action includes research into the information, theses and theories that inform the action itself, which are never considered definitively true but always worthy of further study and revision;
- **principle of biocentrism**: COMI's action aims at a development that sees the human being as a member of the community of life on Earth;
- **the principle of self-determination**: the action of the COMI aspires to a vision of the human being as the protagonist of his own history and of the development of the community in which he lives, an active and responsible subject of democracy and peace; in this perspective, it aims to safeguard, validate and continuously improve the scheme of individual capacities that are the object of its intervention; those that have most characterised the history of the COMI are
 - the ability to imagine, think, reason and feel emotions in a humane way, i.e. informed and cultivated by adequate education, including literacy and knowledge;
 - the ability to live with others and with respect to others, to see the 'right to solidarity' ensured by having one's own mental space in which to imagine and reflect within oneself the condition of others, visible as centres of perception, emotion and reason;
 - the ability to exercise critical sense in a manner protected by guarantees of freedom of expression;
 - the ability to exercise religious freedom and search for meaning in life;
 - the ability to actively participate in the choices that govern one's own life and that of the community
- **principle of non-indifference**: the COMI reacts to the need to preserve and defend what is valuable, either by direct action, if it has sufficient strength, or by advocating its claims to the most appropriate bodies and institutions;
- **principle of non-discrimination**: COMI's action promotes equal treatment with regard to rights, freedoms and opportunities and combats any inequality motivated by diversity;
- **principle of non-discrimination**: the COMI pays equal attention to any subject entering its sphere of action, regardless of the role played in it;
- **principle of effectiveness**: the action of the COMI tends to achieve the best possible outcome, expressly evaluated taking into account all opportunities and alternatives;
- **principle of transparency**: the COMI undertakes to represent its action to everyone; in particular to those who are interested in it, are involved in it, judge it, support it, continue it or have preceded it;
- **Principle of legality**: the COMI assumes its responsibility to act as a subsidiary of the State in international cooperation and, in fulfilling this role, it informs and subordinates all its actions, including any dissent, to compliance with national, supranational and international regulations;
- **principle of democracy**: every COMI choice is derived solely from the evaluation of arguments.

Rules

Governance

The COMI commits itself to

1. form a governing body that is representative of the members and independent in its decisions, whose members have no conflicts of interest of any kind (political, economic, or related to the private sphere of its members);
2. pay attention to every new conjuncture, every change or evolution of demands and needs that arise in Italian society and in the international context;
3. pursue objectives appropriate to the capacity of the structure, seeking the greatest possible effectiveness and efficiency in the use of available resources;
4. Define and propose a response plan to emerging demands and needs that distinguishes direct action from advocacy;

5. have an organisation that clearly distinguishes tasks, responsibilities and processes decision-making, operational and control;
6. conduct its action with integrity, fairness, good faith, proportionality, objectivity, transparency, equity and reasonableness,
7. act independently and impartially;
8. favouring ethical instruments also in the management of economic resources, in investments, in the choice of credit institutions and in the operating methods of its members, volunteers and cooperators.

Human Resources

The COMI commits itself to

9. irrespective of the duration of its relationship with the COMI, give primary attention to the development of the professional skills of its employees, collaborators and volunteers, aware of their relevance to the achievement of its goals, wherever they will be working in the future;
10. use staff adequately motivated and prepared for the tasks and purposes for which they are intended;
11. guarantee equal treatment to all operators, avoiding any kind of discrimination on the basis of age, sex, state of health, nationality, political opinions, religious beliefs, sexual orientation, as well as all morphological and cultural characteristics historically used to support hypothetical racial classifications; special attention is paid to the enhancement of the female component;
12. rejecting and sanctioning any form of moral, physical and psychological harassment, with particular emphasis on sexual harassment.

The COMI requires its employees to commit themselves to

13. interacting in a polite, loyal, cooperative, transparent, trustworthy and trustworthy manner;
14. dressing and grooming oneself taking into account one's role, professional circumstances, local customs and culture;
15. Representing the COMI in the public working environment, with government institutions, local authorities, funders, organisations and stakeholders, as well as with partners and beneficiaries.

Institutional Activities

In the countries of intervention, the COMI undertakes to

16. carry out in-depth research and interpretation programmes on the geo-political context of its activities;
17. elaborate and adopt explicit protocols on better compliance with the principle of legality in the context of local;
18. valorising local human resources, fostering the growth of people's capacities and, at the same time, the cultural and social growth of populations, prioritising the achievement of autonomy through the improvement of family and community economies at all levels;
19. operate on the level of both human capabilities and the state of the environment, even disregarding the cause-effect relationships that link the two levels;
20. ensuring, within the limits of budgetary resources, an environmentally friendly organisation of work and action, in particular by promoting energy saving, dematerialisation of documents, recycling of renewable materials and directing the purchase of goods towards products that ensure environmental sustainability;
21. guarantee equal treatment to all beneficiaries, avoiding any kind of discrimination based on age, gender, health status, nationality, political opinions, religious beliefs, sexual orientation as well as all morphological and cultural traits historically used to support hypothetical racial classifications;
22. Recognising and promoting the role of women as development actors and supporting their ability to make decisions about their own lives and bodies, to make decisions in their families, to make economic choices, to have a political and economic voice and influence in society, to carry out collective action, and to resist and respond to trauma arising from humanitarian and environmental crises;
23. recognising the vulnerable conditions of the weakest and promoting respect for their rights and capacities, in the present and in the future;
24. use, to the best of their ability, the spaces for action reserved for the cooperation bodies by national and supranational political institutions in order to advocate with them;
25. take into account the evaluation of the intervention by its beneficiaries;
26. promote all appropriate awareness and information actions for the dissemination of global citizenship education, solidarity, respect for the environment, for the prevention of

xenophobia, hatred, racism, for the activation of paths of social inclusion of the most vulnerable and for the progressive adoption of more sustainable patterns of living;

In particular in Italy, it is committed to

27. promote the reception of incoming or transiting migrants;
28. promote inter-cultural dialogue and the development of the cultures that animate the life of the country.

Supplementary budget sources

In its relationship with its donors and funders, the COMI undertakes to

29. provide truthful information about the activities for which contributions are sought and dialogue with donors to ensure the best understanding of the information;
30. ensure the best possible implementation of activities in line with the stated objectives by promptly communicating any changes;
31. provide the due documentation by transparently and clearly reporting the costs incurred in the agreed manner;
32. Diversifying sources of funding by fundraising from public, private and individual citizens to enhance the contribution of all actors and foster their independence and autonomy;
33. not accepting sponsorships and donations from parties known to be involved in rights violations human beings and the environment or in economic transactions that are not transparent and verifiable;
34. not to facilitate money laundering activities and to comply with all national and international anti-money laundering regulations.

Information System

The COMI commits itself to

35. treat the information acquired and produced in its activities in ways that favour interchange and interoperability;
36. maintain the utmost attention and awareness of the life of the development cooperation system, respecting the will to donate, collaborate and intervene;
37. make information on their work universally accessible, while respecting the privacy of the persons concerned, and not using it in a distorted manner - for example, for the purposes of their own initiatives - the information, data and images collected;
38. to maintain adequate communication internally with members, supporters, collaborators and volunteers, communicating strategies, programmes and any useful information for the effective participation and development of the association's life;
39. keep universally accessible records of transactions and operations to enable verification of the decision-making process;
40. keep universally accessible records of donations to ensure the accuracy of the amounts and traceability to the donor, without prejudice to the right to privacy;
41. keep universally accessible records of expenditure in order to report to *stakeholders*, donors and civil society on the activities carried out;
42. process the data in a manner aimed at fulfilling the purposes related to the exercise of its activity, protecting the confidentiality of the data and complying with the requirements of EU Regulation 2016/679 GDPR on data protection.

Development of relations with third parties

the COMI commits itself to

43. engaging with any person and any organisation on any issue and in particular with respect to policies and modalities for the implementation of interventions and the modalities and content of advocacy;
44. looking after one's image and reputation;
45. assume awareness and responsibility for all *fundraising* and communication actions, including those delegated to or carried out by third parties;
46. Respect the dignity of beneficiaries and their image in awareness-raising and fundraising campaigns with special attention to minors.

Violations

In the event of any violation of the Code of Ethics and/or of the "Code of Ethics and Conduct" of the Italian Agency for Development Cooperation, the disciplinary measures provided for by the collective agreement shall be taken against the staff and in any case against anyone who has a contract/employment relationship with the COMI