

Code of Ethics of CBM Italia

MARCH 2026



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01 Introduction and Purpose

The CBM Italia's Code of Ethics defines the values, principles, and standards of conduct that guide the Organization in carrying out its activities, both abroad and in Italy.

It is intended for corporate bodies, staff, collaborators, volunteers, partners, suppliers, and Goodwill Ambassadors, who are required to sign it, apply it, and comply with its provisions.

CBM Italia promotes awareness of and compliance with the Code among all parties with whom it works.

The Code of Ethics is an integral part of the Organization's governance and control system and is consistent with the **Organizational, Management, and Control Model** adopted by CBM Italia ETS pursuant to Legislative Decree 231/2001.

Compliance with the Code is an essential element of the contractual obligations of CBM Italia's employees and collaborators, pursuant to and for the purposes of Articles 2104 et seq. of the Civil Code, and helps ensure consistency between professional responsibility and organizational values.

02 Regulatory References and Standards

This Code of Ethics is aligned with the current regulatory framework and international standards governing humanitarian action and the protection of human rights.

With the adoption of Legislative Decree No. 231 of June 8, 2001, Italian law introduced the principle of corporate liability for certain crimes committed in the interest or for the benefit of the entity by directors, executives, or persons under their supervision.

For this reason, CBM Italia has adopted its own Organizational, Management, and Control Model in accordance with Legislative Decree 231/2001. This Code of Ethics constitutes an integral and substantial part of that Model.

Every person working for CBM Italia contributes, through their daily decisions, to the credibility, integrity, and reputation of the Organization.

Humanitarian Principles and Human Rights

CBM Italia's work is based on the universal principles of protecting and promoting human rights and is guided by key international standards, including:

- the Universal Declaration of Human Rights
- the Humanitarian Charter
- the United Nations Convention on the Rights of Persons with Disabilities (CRPD)
- the UN Convention on the Rights of the Child (CRC).

CBM Italia also adopts certain *policies* of CBM International (*Christian Blind Mission*), an international organization active since 1908 in Africa, Asia, and Latin America to help improve the quality of life for people with disabilities; specifically:

- the *Safeguarding Policy*;
- the *Safety and Security Policy*.

Organizational Culture and Individual Responsibility

This Code defines what CBM Italia recognizes as appropriate behavior consistent with its identity and mission. It is not merely a set of rules to be followed, but a shared commitment to common values.

Each recipient is expected to know, understand, and apply the principles contained in this Code, actively contributing to building a work environment based on respect, integrity, and responsibility.

Failure to comply with the provisions of the Code may result in disciplinary action, in accordance with applicable laws and internal procedures.

Compliance with the *Safeguarding Policy* is part of every employee's ethical commitment.

Safeguarding Policy

CBM Italia is committed to being a safe organization for all people with whom it comes into contact, particularly children, adolescents, and adults in vulnerable situations, with and without disabilities.

All those who collaborate with CBM Italia in any capacity are required to behave in a manner consistent with the provisions of the organization's *Safeguarding Policy*.

The *Safeguarding Policy* governs how CBM Italia's programs, activities, and work are carried out to ensure that no one experiences violence, abuse, exploitation, or any form of harm.

03 CBM Italia's Identity and Values

Mission

CBM Italia is an international organization dedicated to health, education, employment, and the rights of persons with disabilities where the need is greatest, both around the world and in Italy.

Founded in 2001 in Milan, it has been recognized as a Non-Governmental Organization (NGO) by the Ministry of Foreign Affairs and International Cooperation since 2009.

In 2023, upon registration in the Single National Register of the Third Sector (RUNTS), it acquired ETS status. In 2024, it became a foundation.

CBM International has been active since 1908 in Africa, Asia, and Latin America, working to improve the quality of life for persons with disabilities.

Vision

CBM Italia believes in a world where persons with disabilities can live without barriers or discrimination.

IDENTITY – VISION AND MISSION

Values

CBM Italia is guided by the following values, which express its mission and guide the work of everyone who serves the organization:

Engaged for Inclusion

We work to ensure that every person with a disability can fully participate in social, educational, and professional life.

Building Together

We work alongside donors, partners, institutions, and local communities, recognizing the value of lasting collaboration.

Humanity and Openness

Diversity is a source of strength: we recognize the value of every person regardless of ethnicity, gender, or religion.

Pragmatism and Transparency

We communicate clearly, measurably, and authentically, following internationally recognized standards.

Rights and Equity

We promote the cultural change needed to break down the barriers that lead to inequality and discrimination.

IDENTITY – VISION AND MISSION

Areas of Intervention

In its work, CBM Italia adopts a human rights-based approach guided by the United Nations Convention on the Rights of Persons with Disabilities, both abroad and in Italy.

CBM Italia has been working in partner countries since 2001 on projects that ensure access to health care, education, employment, and the rights of persons with disabilities; since 2020, it has also been active in Italy with initiatives that prioritize the rights of persons with disabilities, aiming to make environments and communities more accessible and inclusive, and helping to bring about structural and lasting change.

CBM Italia's intervention model involves implementing activities through local partners—local stakeholders and institutions, government agencies, nongovernmental and civil society organizations, and consortia of sector stakeholders rooted in the local community—who facilitate and promote on-the-ground development.

Operating in this way means fostering and strengthening partnerships that recognize and leverage existing resources (human and material) and expertise within the intervention contexts.

In partner countries

This approach is reflected in CBM Italia's structure in partner countries, which relies on on-site offices—Country Offices—that are part of the CBM International network and managed by local staff.

At the same time, the *Initiatives* (areas of intervention) provide technical support to ensure high-quality programs and to identify and disseminate best practices and lessons learned.

The strategic areas of intervention where CBM Italia focuses its activities are: Inclusive Health, Community-Based Inclusive Development, and Inclusive Humanitarian Action.

IDENTITY – VISION AND MISSION

In Italy and Europe

Since 2020, CBM has also been working in Italy to promote rights and a culture of inclusion, in which persons with disabilities are recognized in society without discrimination.

In Europe, we work to help make systems truly accessible through training activities and an inclusive design approach.

Our work spans the following areas: inclusive education, participation, employment, and combating discrimination.

Institutional Structure and Regulatory Framework

Established on October 26, 2001, as a Non-Profit Organization of Social Utility (Onlus) in the form of a voluntary association pursuant to Article 36 et seq. of the Civil Code, on September 12, 2023, in compliance with the provisions of Legislative Decree 117/2017, CBM Italia registered with the RUNTS (Single National Register of the Third Sector) in the section “g – Other Third Sector Entities,” thereby also changing its name to CBM Italia ETS. The Bylaws, updated on July 24, 2023, define the Foundation’s purposes, operating procedures, and statutory bodies in accordance with the provisions of the Third Sector Code.

The CBM Italia ETS Foundation operates on a nonprofit basis; it is an autonomous entity and has no political objectives. The Foundation pursues civic, solidarity-based, and socially beneficial objectives, focusing on people with disabilities—primarily in partner countries—by providing health, educational, and rehabilitative services.

In order to pursue the aforementioned objectives, it primarily carries out activities of general interest in the following areas: development cooperation, pursuant to Law No. 125 of August 11, 2014, as referred to in Article 5, paragraph 1, letter n) of Legislative Decree 117/2017; social interventions and services, and health interventions and services as referred to, respectively, in Article 5, paragraph 1, subparagraphs (a) and (b), of Legislative Decree 117/2017; humanitarian reception as referred to in Article 5, paragraph 1, letter r); scientific research of particular social interest as referred to in Article 5, paragraph 1, letter h); promotion and protection of human, civil, social, and political rights as referred to in Article 5, paragraph 1, letter w).

On September 18, 2009, CBM Italia Onlus was recognized by the Ministry of Foreign Affairs (Directorate General for Development Cooperation – Office VII) as an NGO (Non-Governmental Organization) authorized to operate in the field of cooperation with developing countries (Art. 28 of Law No. 49 of February 26, 1987, and subsequent Law No. 125 of August 11, 2014).

04 Scope of Application

All individuals subject to the Code of Ethics are required to conduct themselves—both in internal matters and in dealings with external parties—in accordance with applicable laws and the values and principles that guide the Organization.

In particular, each person is required to:

- refrain from conduct that could constitute or facilitate the commission of the offenses referred to in Legislative Decree 231/2001;
- cooperate with the Supervisory Body in carrying out verification and control activities, ensuring transparency and willingness to provide the requested data, information, and documentation.

In addition, those subject to this Code of Ethics must also comply with **the rules of conduct set forth below**, which may concern both issues deemed to be of particular ethical significance and specific areas of the organization's activities.

STANDARDS OF CONDUCT

05 Relationships with Beneficiaries and Communities

Prioritizing and Protecting Persons in condition of vulnerability

In its relationships with beneficiaries and their communities, CBM Italia requires and actively promotes the following behaviors:

- treating others with respect, dignity, and impartiality regardless of gender, ethnicity, religion, sexual orientation, or whether or not they have a disability
- ensuring practices that include people with disabilities and prevent exclusion
- respecting the culture and laws of host countries and communities (whether during long-term stays or on missions/business trips), avoiding behavior that is offensive or that could jeopardize one's own safety or that of colleagues
- wearing appropriate clothing that respects local customs.

06 Communication

Respectful and Ethical Communication

CBM Italia listens to and gives a voice to persons with disabilities and the communities with which it works. CBM's communication is grounded in respect and practicality, valuing the dignity of persons with disabilities and the real impact of its projects.

CBM Italia is committed to communicating clearly and precisely, even when the subject is complex, and to make its communication as **accessible** as possible.

Respectful communication is reflected in all narrative tools, particularly **photography**.

CBM Italia is committed to collecting images exclusively with the **consent** of those depicted and with respect **for their privacy**.

Images must portray people, contexts, and stories with respect, authenticity, and dignity, avoiding pitying or sensationalist tones.

STANDARDS OF CONDUCT

CBM Italia is committed to the authenticity of what it documents and to respecting its donors. For this reason, it does not generate visual content using artificial intelligence that depicts unreal beneficiaries or situations.

Proper Use of the CBM Logo

The CBM logo combines two essential elements: **the CBM logotype and the symbol**, which, when used as a single mark, express the organization's identity, purpose, and global reach.

Both elements are equally important: one gives the organization its name, while the other gives it a visual voice. Used together, they create a distinctive and recognizable identity.

To protect the brand's integrity, the CBM logo must always be used consistently and in accordance with the guidelines set forth in the CBM Italia's Brand Manual. Only official digital materials may be used when displaying the CBM logo.

Proper Use of Social Media

CBM Italia believes in technological innovation and digital tools; it also makes use of social media in its communications.

Given the reach and impact these tools can have, it is essential to exercise the utmost care when evaluating content and materials to be shared.

CBM Italia prohibits the use of the organization's systems in violation of the law, in a manner that infringes upon the freedom, integrity, and dignity of individuals, or that may cause intrusions or damage to information systems.

07 Internal Relations

CBM Italia is committed to ensuring equal opportunities for professional development, avoiding all forms of discrimination, and promoting an environment based on fairness, integrity, inclusion, and meritocracy.

Relationships among employees, regardless of their level of responsibility, are based on loyalty, fairness, and mutual respect, with full recognition of roles and functions. Every person working for CBM acts with a sense responsibility, efficiency, and collaboration, in line with the organization's values.

Staff selection is conducted in accordance with internal protocols, based on criteria of transparency, competence, and professionalism, as well as individual skills and potential.

The organization ensures that all employment contracts comply with applicable laws and regulations and prohibits any form of irregular, undeclared, or unlawful employment.

Health, Safety, and Wellbeing in the Workplace

The organization promotes health and safety in the workplace, committing to preventing risks associated with the performance of work activities. All staff are required to comply with the obligations set forth by applicable laws and internal safety procedures. In particular, CBM Italia:

- ensures that staff receive adequate information and training on occupational health and safety
- ensures that all employees work in a safe environment and have the necessary protective equipment, periodically verifying the suitability and compliance of workplaces, ensuring their compliance with national and local regulations, and requiring staff to fully comply with applicable requirements
- adopts, uses, and maintains appropriate safety equipment and measures requires suppliers, contractors, and third parties acting on its behalf to ensure
- adequate health and safety conditions while performing the assigned activities.

STANDARDS OF CONDUCT

All recipients of this Code of Ethics must comply with the provisions and instructions provided by the Employer and work together with the designated personnel to promote a safe work environment, in order to ensure individual and collective protection.

08 Management of Resources and Funds

All donations to CBM Italia must be transparent. This means that the identity of the recipient and the purpose of the donation must be clear, and the reason and purpose of the donation must be justified and documented.

Fictitious donations—that is, donations that appear to be compensation for a service but are substantially greater than the service’s actual value—are prohibited because they violate the principle of transparency. CBM Italia does not make financial contributions to political campaigns, political parties, political candidates, or any of their direct and/or indirect affiliated organizations.

In principle, the occasional acceptance or offering of gifts of “modest value” (for example: meals, holiday gift baskets, small trinkets, etc.) is a legitimate contribution to good corporate and professional relationships, including those of the organization. Therefore, the acceptance or offering of modest gifts that fall within the “modest value” category and are consistent with local customs and practices is permitted.

However, gifts, meals, trinkets, etc., that—even if of “modest value”—are excessively generous are prohibited.

STANDARDS OF CONDUCT

09 **Relations with the Public Administration and Institutions**

All relations with individuals who qualify as Public Officials or Public Service Employees must be conducted in full compliance with applicable laws and regulations and with this Code of Ethics, in order to ensure the absolute legitimacy of CBM Italia's operations.

Within the limits set forth below, CBM Italia prohibits the acceptance, offering, or promising—even indirectly—of money, gifts, goods, services, benefits, or favors in the context of relationships with Public Officials or representatives of entities and institutions, with the intent to influence their decisions or the performance of their official duties.

10 **Relationships with Donors, Supporters, and Stakeholders**

CBM Italia offers the opportunity to support concrete initiatives aimed at improving the lives of persons with disabilities, especially in the most vulnerable contexts and during emergencies. It does so with transparency, many years of experience, and measurable results: documented projects, authentic stories, and certified accountability.

All of this ensures an informed and responsible donation that makes a real impact.

CBM Italia complies with applicable laws regarding financial statements and fulfills the administrative and accounting obligations set forth by regulations.

The information and data provided by the organization to third parties, along with the accounting records of its operations, ensure truthfulness, transparency, clarity, accuracy, and completeness. Specific procedures confirm their effectiveness. The annual financial statements are subject to certification by an independent auditing firm appointed for this purpose. The organization takes great due care in preparing the financial reports intended for donors.

STANDARDS OF CONDUCT

11 Conflicts of Interest

CBM Italia's staff and those subject to the Code of Ethics are required to carry out their activities in accordance with the Organization's objectives and general interests, avoiding situations involving actual or potential conflicts of interest.

Any situation that could potentially give rise to a conflict of interest or otherwise compromise the ability to make decisions in CBM Italia's best interest must be immediately reported by the individual to their Supervisor/Line Manager — refraining in any case from making any decisions or resolutions regarding the matter—or reported through the reporting system.

12 Protection of Information and Data

CBM Italia is committed, in the conduct of its professional activities, to using IT tools and services in full compliance with applicable regulations regarding cybercrime, cybersecurity, privacy, and copyright, in full compliance with the General Data Protection Regulation No. 2016/679 (**GDPR**) and **Legislative Decree 101/2018**.

Those subject to this Code of Ethics are required to ensure the utmost confidentiality regarding individuals, entities, or institutions about whom they possess protected information, refraining from disclosing confidential data or content.

The organization implements preventive and adequate security measures for all databases containing personal information, in order to prevent risks of destruction, loss, disclosure, unauthorized access, or processing that does not comply with the law.

13 Whistleblowing System

The Foundation CBM Italia is committed to adopting an effective policy for reporting violations, as a fundamental tool for promoting transparency, fostering ethical conduct, and preventing the risk of future irregularities within the organization.

Any violation of the principles and provisions of this Code of Ethics must be promptly reported through the **dedicated Whistleblower Software platform** at <https://whistleblowersoftware.com/secure/CBMITALIA>, which ensures maximum confidentiality and complete data encryption.

The reporting officers evaluate the reports received, conduct the necessary investigations within their remit, and inform the Supervisory Body and the relevant governing bodies regarding the potential initiation of procedures provided for in the event of confirmed violations of the Code.

All reports are treated with absolute confidentiality. Whistleblowers acting in good faith are protected against any form of retaliation, discrimination, or penalization. The confidentiality of their identity is always guaranteed, except where required by law or where necessary to protect the rights of the organization, any individuals involved, or third parties.

14 **Disciplinary System and Consequences of Violations**

Compliance with this Code of Ethics is an integral part of the contractual obligations of those to whom it applies. Violations of the principles and provisions contained herein are subject to disciplinary measures proportionate to the severity of the violation and in accordance with applicable law, applicable collective bargaining agreements, and internal procedures.

Employees who violate the provisions set forth in this Code of Ethics are subject to the sanctions provided for in the disciplinary system of the National Collective Bargaining Agreements adopted by CBM Italia.

Sanctions may include reprimands, suspensions, disciplinary actions, or, in the most serious cases, termination of the employment or contractual relationship. For external parties (suppliers, consultants, partners), violations of the Code may result in the suspension or termination of the contractual relationship, without prejudice to any further action for compensation for any damages.

Every measure is taken in accordance with the principles of impartiality, proportionality, and the right to be heard, ensuring that the person concerned has the opportunity to present their case. Sanctions are imposed in coordination with the competent bodies, based on the findings provided by the Supervisory Body.

15 Supervisory Body

The Supervisory Body is a fundamental component of CBM Italia's Organization, Management, and Control Model.

The Supervisory Body performs an active oversight and support function for the organization's governance, with clearly defined responsibilities:

- overseeing the effectiveness of the Model: periodically verifying that procedures, controls, and delegations of authority are correctly applied in all activities, from the management of donations and international projects to the reporting of public and private funds
- proposing updates and amendments: it monitors regulatory changes, developments in the organization's activities, or organizational changes, suggesting updates to the Model to ensure its ongoing adequacy and effectiveness
- managing reports (whistleblowing): receiving and evaluating reports of violations, including anonymous ones, in compliance with applicable laws and protecting those who report conduct that is unlawful or inconsistent with the organization's ethical values
- Coordination with other functions: works closely with the Board of Directors, General Management, and the DPO, providing support regarding compliance, personal data protection, and the proper application of procedures
- Periodic reports to the Board of Directors: prepares detailed reports on activities carried out, highlighting any critical issues, identified risks, and operational proposals for managing critical processes.

16 Adoption, Dissemination and Training

This Code of Ethics has been approved by the Board of Directors of CBM Italia and disseminated to all those with whom CBM Italia maintains relationships, through appropriate information and communication channels.

The Code is made available through:

- cbmitalia.org website
- Distribution to all in electronic format, publication via the website and the internal Enjoy portal.

All recipients are required to sign a declaration confirming receipt and acceptance of the Code of Ethics and their commitment to comply with the principles and guidelines set forth therein.

The Supervisory Body regularly promotes and oversees training activities dedicated to the principles contained in this Code.

17 Updates and Revisions

- Frequency
- Responsibility
- Alignment with Regulatory Developments

Prepared by: Internal Cross-Departmental Working Group

Approved by: CEO CBM Italia

Approved by: Board of Directors on March 25, 2026



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