The Integra Foundation Code of Ethics

The Purpose of the Integra Foundation Code of Ethics

The Integra Foundation Code of Ethics gives clear guidelines to all representatives of the Integra Foundation on how to behave, so that the Integra Foundation's humanitarian and development work is not compromised in any way as a result of unethical behaviour by its employees or other representatives.

Who Is Obligated to Follow the Code

The Integra Foundation Code of Ethics applies to all its employees, the director, board members, volunteers, interns of the Integra Foundation and its affiliates, individuals as well as partners, organizations with short-term or long-term contractual obligations, and any other persons acting on behalf of the Integra Foundation (hereinafter referred to as *"representatives of the Integra Foundation"*). Representatives of the Integra Foundation are expected to familiarize themselves with and comply with this Code.

Summary

The Integra Foundation Code of Ethics stipulates that all representatives of the Integra Foundation must act *honestly, with integrity*, approach others with *dignity* and *respect*, and behave *responsibly* in their work.

All representatives of the Integra Foundation are also required to comply with the relevant policies of the Integra Foundation, the laws of the Slovak Republic and also of other countries in which the Integra Foundation and its affiliates implement their projects, as well as the relevant standards for the humanitarian organizations to which the Integra Foundation is committed. This Code lists and highlights key points of the Integra Foundation's policies that address how to treat people, how to use financial resources, protect information, and more.

This Code further defines how representatives of the Integra Foundation should behave both inside and outside the organization. The Code addresses the responsibilities of the representatives towards the Integra Foundation, each other, the public, and the people and communities they serve.

Basic Recommendations for Representatives of the Integra Foundation:

Representatives of the Integra Foundation should be aware of their responsibility for their behavior in the workplace and outside it.

During their work, representatives of the Integra Foundation are obliged to avoid even seemingly inappropriate or illegal behaviour, in order to preserve the good reputation of the Integra Foundation and its affiliates.

Representatives of the Integra Foundation should always consider their actions and seek advice if they are unsure.

If someone has any doubts about their actions, it is necessary to ask the following questions: Is this behaviour in accordance with the Integra Foundation Code of Ethics? Is this behaviour ethical? Is this behaviour legal? Will this behaviour have a positive effect on my reputation or that of the Integra Foundation? Would I like to read about it in the news or on the internet?

If the answer to any of these questions is "no", this behaviour should be avoided.

Code Violations and Reporting Obligations

Compliance with this Code is mandatory for all representatives of the Integra Foundation. Its violation will result in disciplinary actions and sanctions, which will be determined by the Integra Foundation at its discretion. The sanctions may include a warning, but also termination of cooperation or, if the situation requires it, reporting to the competent authorities.

All representatives of the Integra Foundation are obliged to report a violation or suspected violation of this Code. If anyone suspects that there has been a violation of the Code, it is necessary to report it to the director of the Integra Foundation, or by email to staznosti@integra.sk.

The Integra Foundation will immediately investigate any suspected violation of the Code and, if necessary, carry out a thorough investigation.

Suspected violations by persons in a managerial position or by board members should be reported to the director of the Integra Foundation via the aforementioned email address. Suspected violations by the director of the Integra Foundation should be reported to the chairman of the Integra Foundation board of directors.

The Integra Foundation undertakes to protect any person who reports a suspicion of fraudulent or illegal activity against reprisals, provided that the reporting person acted in good faith and not with malicious intent to harm another person by falsely accusing them of wrongdoing.

Third Party Verification

Before entering into a contract for the provision of services or goods with a third party, or before entering into a partnership with another organization for the provision of assistance to beneficiaries, representatives of the Integra Foundation must examine their background and confirm their willingness and ability to comply with this Code. Contracts with third parties require compliance with this Code.

How to Treat People:

Prohibition of Harassment, Bullying and Discrimination

The Integra Foundation is committed to creating a safe environment for all its employees without any form of harassment, including sexual harassment, discrimination or bullying.

The Integra Foundation does not tolerate any form of sexual harassment. Any accusation will be taken seriously and will be investigated immediately. Representatives who are found to have sexually harassed another person will face disciplinary action, including dismissal from their jobs. Representatives are expected to know and comply with the principles stipulated in the internal directive on the protection against discrimination, harassment, bullying and abuse in the workplace.

Prohibition of Sexual Exploitation and Abuse

Representatives of the Integra Foundation are strictly prohibited from engaging in or facilitating any form of sexual exploitation, abuse or gender-based violence, in particular that which involves beneficiaries of assistance. Representatives are expected to know and comply with the principles stipulated in the Policy on the Prevention of Sexual Exploitation and Abuse.

The Integra Foundation seeks to promote the six fundamental international principles regarding the prohibition of sexual exploitation and abuse:

- 1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (i.e. persons under the age of 18) is prohibited regardless of the age of majority in the given country or sexual maturity. Misconceptions about the child's age are not a defense.
- 3. The exchange of money, employment, goods or services for sex, including sexual favours or other forms of degrading or exploitative behavior, is prohibited.

- 4. Sexual relations between humanitarian workers and beneficiaries are prohibited. Such relations undermine the credibility and integrity of the work conducted by the Foundation.
- 5. If a humanitarian worker has concerns or suspicions about sexual abuse or exploitation, they are required to report such concerns through the established procedures.
- 6. Humanitarian workers are required to create and maintain an environment that prevents sexual exploitation and abuse, and promotes the implementation of this Code. Managers at all levels have a special responsibility to support and develop the systems that sustain this environment.

Child Protection

Representatives of the Integra Foundation are obliged to protect children from any form of abuse, and to maintain an environment that prevents such actions. Abuse includes all physical and mental abuse, violence, insulting behavior, sexual activity, neglect, and sexual exploitation.

Representatives of the Integra Foundation are also responsible for protecting the personal data of children. Sharing personal information and photos is possible only when it is necessary for the work of the Integra Foundation. Representatives are expected to know and adhere to the Marketing and Photography Policy.

Representatives of the Integra Foundation are prohibited from engaging in sexual activity of any kind with minors or anyone below the age of majority. Misconceptions about age are not a defense.

Representatives of the Integra Foundation are prohibited from engaging in facilitating or organizing any form of child labour, or in aiding it. Representatives do not employ persons below the legal minimum age of employment. Representatives must also comply with international standards and local labour regulations.

Representatives of the Integra Foundation are expected to know and adhere to the principles of the Child Protection Policy.

Forced Labour and Human Trafficking

The Integra Foundation does not tolerate forced labour, human trafficking (trafficking in human beings for the purpose of forced labour or sexual exploitation), or any form of modern slavery. These activities constitute serious human rights violations and crimes. Representatives shall not engage in, support, facilitate or organize forced labour or human trafficking of any kind.

Representatives are expected to know and adhere to the Policy on the Prevention of Forced Labour and Human Trafficking.

How We Use Resources:

Fraud and Corruption

Representatives of the Integra Foundation are forbidden to participate in any corrupt practices, such as giving or receiving bribes, or engaging in fraudulent activities.

It is also prohibited to provide payments for simplifying or accelerating the procedures of common functions. Representatives are obliged to know and adhere to the principles of the Anti-Corruption Policy of the Integra Foundation.

Representatives must protect the Integra Foundation from fraud. Representatives must use assets and resources only for the given purpose and legitimately. All financial transactions must be substantiated by receipts. All records and accounts must be retained. Reporting financial data must be timely and accurate.

Representatives are prohibited from any conduct, even in the form of an attempt, to obtain funds dishonestly.

Money Laundering

Representatives of the Integra Foundation are prohibited from engaging in or facilitating transactions involving proceeds from illegal activities. All funds received from third parties must be verified to ensure that they are not proceeds of criminal activity. This means, at a minimum, confirmating and verifying the identity of the third party and, where applicable, its financial intermediary. If any suspicion arises, this must be reported to the director immediately, and the transaction should be suspended.

Procurement

All procurement decisions must be transparent, fair and impartial. One of the key pillars of the Integra Foundation is "responsible and transparent stewardship towards our donors and the communities we help". The responsibility of spending financial donations wisely, whether from a private donor or a large institutional donor, is a high priority for the Integra Foundation. The Integra Foundation seeks to promote open, transparent and traceable operations, and to obtain the required quality of services, supplies or work at the best possible price.

Anti-terrorism Laws, Sanctions and Embargoes

Representatives must comply with valid anti-terrorism laws, as well as sanctions and embargoes, that apply to the countries in which the Integra Foundation and its affiliates operate. This includes carrying out appropriate background checks on partners, suppliers and employees.

Environmental Responsibility

Representatives of the Integra Foundation should carry out all their humanitarian and development activities in an environmentally responsible manner. The Integra Foundation is committed to the following environmental principles:

- 1. Compliance with environmental requirements and laws
- 2. The 4R rule Reduce, Reuse, Repair, Recycle
- 3. Minimising the impact of travel on the environment
- 4. Saving energy, water and other resources
- 5. Procurement of environmentally sustainable goods
- 6. Integrating environmental sustainability principles into programs
- 7. Environmental education and awareness

Representatives are expected to know and adhere to the principles stipulated in the Integra Foundation's Environmental Policy.

Protection of Personal Data and Information

Representatives of the Integra Foundation have access to sensitive and confidential information, such as financial data or personal data on donors or beneficiaries.

Representatives are prohibited from disclosing or misusing sensitive and confidential information. Representatives are required to ensure that appropriate safeguards are in place to prevent the misuse of such information. This obligation of confidentiality continues even after the termination of the business or employment relationship. Representatives are expected to know and comply with the Principles of Data Protection.

External Communication of the Integra Foundation

Any external communication of the Integra Foundation, including communication used for fundraising purposes, will be honest, accurate and ethical. During external communication, the Foundation and its employees will respect and present the local communities, beneficiaries and people affected by a crisis as dignified people.



Feedback

At the Integra Foundation, we welcome feedback and view it as an opportunity to learn and improve, and as a chance to remedy things towards the person or other entity that made the complaint. Complaints, feedback or concerns can be emailed to staznosti@integra.sk, which is managed directly by the director of the Integra Foundation, or also by a person authorized by him. We deal with complaints immediately; no later than 10 days after they are submitted.

The Code of Ethics was adopted on 01.02.2022.