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CODE OF ETHICS AND CONDUCT



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1.- RATIONALE FOR EYES OF THE WORLD CODE OF ETHICS AND CONDUCT

The present Code of Ethics and Conduct recognizes the Eyes of the World as an active member of the current society and emphasizes its commitment to excellence, transparency, and accountability.

This document gathers the principles, guidelines and criteria, coherent with the fulfillment of the Foundation's mission, which shall serve as a guide for the execution of actions and the administration of the entity.

The Code of Ethics and Conduct is subject to the principles established in the **Universal Declaration of Human Rights** and it is globally applicable, remaining valid and fully compliant in any territory where the Foundation intervenes or in any type of action it may undertake.

It must be respected by all members of the organization, including volunteers or occasional participants who partake in the implementation of activities. That is, it applies to every individual who participates in Eyes of the World, regardless of their degree of involvement: volunteers, contractors or members of committees or Boards of Directors.

Besides the Code, all individuals in Spain are subject to regulations such as: the Organic Law on Data Protection, legislation for the protection of whistleblowers and transparency regulation.

Furthermore, contractors are subject to the collective bargaining agreement or similar regulations of each territory in which they work, as well as to the internal rules, policies and processes of the organization.



2.- IDENTITY OF EYES OF THE WORLD

2.1.- FUNDAMENTAL PRINCIPLES AND PREMISES OF ACTION

Eyes of the World strives to eradicate preventable blindness in the countries where it operates, considering at all times the responsibility of each of its actions, the importance of the people it supports and, above all, its commitment to the population it serves. Our **fundamental principles** are the following:

HUMANITY: Eyes of the World is a health organization whose projects have a direct impact on people's health. In all cases, the Foundation's fundamental principle is respect for human dignity and the alleviation of suffering. Every member of the organization must respect the code of ethics of their profession.

INDEPENDENCE: Eyes of the World attempts to diversify its financing sources with the aim of guaranteeing its ethical and financial freedom.

EQUAL OPPORTUNITY AND GENDER EQUALITY: The Foundation helps the most vulnerable people and groups, regardless of social, religious, ethnic or any other type of distinction, in order to guarantee equal opportunities in their right to access to eye health. Eye of the World incorporates the gender perspective in all areas of the organization.

ALTRUISM: Eyes of the World is an organization based on voluntary services, although it also relies on paid staff necessary to achieve a coordinated, continuous and efficient operation. Volunteers at Eyes of the World contribute their professional and human skills and are committed to the people and groups that receive the help through the activities of the Foundation and the society in general.

PROFESSIONALISM: **Volunteers and employees of the Foundation must be able to maximize the performance of their actions and the resources they manage.**

TRANSPARENCY: Eyes of the World is committed to the beneficiary populations, partners and donors to act with total transparency, reporting on the proper use and management of its funds and incorporating all the required guarantees to demonstrate the efficiency of its operations.

In regards to the **premises of action**, the Foundation stresses on:

- **Sustainability** of the actions, intended as a long-term commitment with the population and the authorities, with the objective of guaranteeing sustainability and technical, economic and environmental viability.
- Developing and promoting training as a tool for the future.
- **Cooperation**, which implies collaborating with other organization that operate in the area as well as integrating in the local health network.
- **Efficiency** and capacity to maximize and control human, material and natural resources.

2.2.- CROSS-CUTTING PRIORITIES

Gender perspective:

Gender equity is one of the fundamental principles of the Foundation, through which it is committed to developing actions aimed at empowering women and achieving equal access to eye health for women.

Eyes of the World implements a **Gender Strategy** to integrate the gender perspective in cooperation projects, in communication, education and awareness-raising actions, and in the organizational culture of the entity.

Additionally, Eyes of the World has a person responsible for the implementation, monitoring and evaluation of the strategy based on the established objectives, results and activities.

The Gender Strategy is periodically reviewed to adjust it to the realities of the Foundation at any given time.



Environmental responsibility:

In compliance with the environmental principles of the United Nations' Global Compact and the Sustainable Development Goals, Eyes of the World's actions focus on adopting and monitoring the following measures:

- Eyes of the World integrates environmental regulations in a coherent manner in all decision-making processes and in all actions conducted in the organization, adhering to the principles of environmental impact prevention and reduction, while promoting a process of continuous improvement in environmental management and behavior.
- Eyes of the World encourages initiatives for greater environmental responsibility. In this regard, the Foundation has an **Environmental Management Plan** that promotes the environmentally responsible use of energy resources and the separation, reuse and recycling of waste and other materials. This Plan also integrates environmental sustainability into the Foundation's strategies, projects and operations.
- Eyes of the World fosters the development and dissemination of new environmentally friendly technologies, such as video conference training to reduce travel.

3.- SCOPE OF APPLICATION

3.1.- RELATIONSHIP WITH PROJECT PARTICIPANTS

The Foundation ensures absolute respect for human dignity and, in particular, for those in situations of vulnerability.

Any act of exploitation, violence or sexual abuse, as well as any violation of the criminal law of the country where they occur within the context of contact with persons served or participants in the projects will result in consequences that may include suspension, immediate repatriation, dismissal and disqualification from any future vacancy in the Eyes of the World Foundation. Such measures will be applied on a case-by-case basis to all staff and volunteers.

3.2.- RELATIONSHIP WITH CHILDREN AND ADOLESCENTS

One of the most vulnerable population groups that the Foundation focuses on are children and adolescents. Consequently, the Foundation establishes rules for all of its actions in order to guarantee the protection of the children and adolescents whom it interacts with. To this end, the Foundation is committed to:

- Denouncing and condemning actions that violate children's rights, malpractice or violent behavior.
- Guaranteeing personal data privacy and confidentiality of children and their families.
- Establishing relationships free of any type of violence and discrimination in all areas and spheres that affect children.
- Complying with the laws and customs of each territory concerning child photography and filming and the right to their image, privacy and dignity. When photographing or filming children, only use devices assigned by the Foundation (camera, video camera or cell phone) intended solely and exclusively for this purpose.
- Avoiding inappropriate actions or behaviors for the care, protection and participation of children. Professionals or volunteers residing in Spain who are required to be in regular contact with children or adolescents will be asked to provide a clear certificate of sexual offenses¹, as well as persons residing in other countries with a similar document. If otherwise, they will be asked to provide a written statement. Similarly, when working with local partners or other organizations that may have contact with children or adolescents, Eyes of the World will request that these or similar standards be applied and this will be stated in the written agreements signed with such entities.

In regards to the relationship with children, the Foundation prohibits the following:

- Engaging in behavior, attitudes or theories that incite hatred, racism, sexism or homophobia against children.
- Displaying offensive behavior, inappropriate physical conduct or sexually provocative behavior in the presence of children.
- Behaving in any way that may cause harm in any area of a child's life.
- Engaging in sexual activities with children or adolescents, either physically or virtually.
- Discriminating against, showing discriminatory treatment of, or favoring certain children to the exclusion of others.

¹ In accordance with Law 26/2015, of July 28, on the modification of the system for the protection of children and adolescents, as well as Law 45/2015, of October 14, on Volunteering.

- Using forms of personal contact with children participating in Eyes of the World programs, such as email or cell phones, for any purpose other than the Foundation's activity.



3.3.- RELATIONSHIP WITH THE PRIVATE FOR-PROFIT SECTOR

The Foundation shall ensure that the relationships it maintains and may maintain with companies and/or sponsoring companies do not condition the independence of its decisions and activities, nor do they conflict with its mission, vision and values.

For this reason, Eyes of the World will demand from its collaborators:

- Socially acceptable and responsible behavior.
- Comply with the current labor legislation in all countries where it operates, specifically in terms of non-exploitation of children, wages, legal working hours, etc.
- Comply with current environmental legislation, as well as with child protection and gender equality regulations, if applicable, both in the country of origin and in any other country where they operate.
- Comply with the tax legislation in force in their country of origin, as well as in any other country where they operate.
- Not to engage in an activity or be constituted by a capital that is, directly or indirectly, related to the manufacturing or trade of weapons or any other product intended for violent acts or military use.
- Respect gender equality at all levels.

3.4.- RELATIONSHIP WITH PROVIDERS

Eyes of the World provides medical supplies, equipment and other goods by purchasing from suppliers or through donation. In this sense:

- Eyes of the World shall aim to establish collaboration agreements with companies and individual donors aiming to ensure the lowest costs, without detriment to the quality of the medical material used in the programs.
- Any person, whether linked to Eyes of the World or not, who wishes to negotiate or enter into an agreement with a supplier (either of goods or services) on behalf of the Foundation, must have the prior and explicit agreement of the Management of Eyes of the World.

3.5.- RELATIONSHIP WITH PERSONS ASSOCIATED WITH EYES OF THE WORLD

The members of the Board and the Executive Committee apply the following principles in human resources management, both for contracted personnel and volunteers and/or scholarship recipients:

- Work for equity and equal opportunities, through specific procedures and human resources management policy.
- Ensure that the selection, placement and promotion of personnel is based on ability, qualifications, knowledge and experience, guaranteeing at all times that there is no distinction, exclusion or preferences based on other aspects.
- Maintain the appropriate professional team to perform quality work and promote internal communication, as well as training, to motivate and develop the competencies of the team.
- Respect employees' rights, as well as their freedom of association, conscience, expression or worship.
- Ensure the health, safety and work-life balance of employees, complying with the current legislation.
- Work towards creating a positive work environment, fostering a climate of respect among all members of the Foundation and denouncing any type of offensive.
- Build professional volunteerism as the basis for a useful and enriching collaboration. Volunteers who are part of the Foundation are an added value, reinforcing the Foundation's link with society.
- Preferably, hire local personnel in the countries where it operates.
- Provide complaint and whistle-blowing mechanisms to prevent, detect and manage any type of misconduct, abuse or harassment.



4.- OPERATION AND ACTION CRITERIA

4.1.- CONFLICT OF INTEREST AND FRAUD AND CORRUPTION PREVENTION

Decision-making processes will be impartial and according to the Code of Ethics and Conduct.

In the event of conflict between the interests of the organization and the private interests of volunteers, contractors, associates or members of committees or the Board that may unduly influence the exercise of their functions and responsibilities, the interests of the organization shall prevail over those of its personnel; especially in the case of persons who are part of the governing and management bodies and of those who hold decision-making and advisory positions in the labor or economic-financial management, and in the entity's relationship with suppliers of goods and services and/or counterparties.

Corruption, understood as the abuse of power for personal gain, and fraud, understood as the dishonest procurement of a benefit (tangible or intangible) by deception or other means, must be particularly avoided. Fraud encompasses a range of irregularities and illegal acts, all of which are based on intentional deception.

Procedures shall be established to prevent, report and manage any misconduct, conflict of interest, fraudulent or corrupt acts.

4.2.- FUNDRAISING AND MANAGEMENT

Eyes of the World is financed by public and private funding and works to optimize resources.

It is of special importance to reflect the Foundation's principles in fundraising and the use of economic resources. To this end:

- In fundraising activities, Eyes of the World will act with fairness, honesty and integrity at all times.
- When a person, associated or not with Eyes of the World, receives a one-time contribution to the Foundation, they must inform the Executive Committee or Management, in order to include it in Eyes of the World's accounting, thereby guaranteeing total transparency of data.
- Eyes of the World respects the will of the donors as to the final destination of their funds. In case of any modification, the donor will be informed in a timely manner.
- Eyes of the World guarantees the privacy and confidentiality of the data and information of its donors and collaborators, and requests their prior consent to make them public.
- Eyes of the World conducts external evaluations and audits for the organization and reports the financial data each year in the annual activity report, which is published annually, also on the website, thereby making it available to partners, donors and collaborating entities.

4.3.- PERSONAL DATA AND IMAGES

Strategic communication objectives shall guide all communication initiatives and the corporate image shall be displayed in all public events of the Foundation.

All public interventions and statements by Eyes of the World members, as well as the Foundation's relationship with the media, shall be scheduled and coordinated by the Board of Directors of Eyes of the World.

Eyes of the World places people at the center of communication and avoids stereotypes insofar as they may encourage discrimination, with special emphasis on gender stereotypes and sexist language.

Eyes of the World strives for gender equality and tries to reflect a balanced presence of both sexes in its content and public projection.

Eyes of the World safeguards the images of children. All content, photographs or videos published on social networks or other communication channels of the entity will be validated by the Communication Area, guaranteeing respect for the law, customs and children's rights.

Similarly, the Foundation ensures proper use of the personal data of third parties through the different collection channels, and makes use of them while respecting their rights according to the European Data Protection Regulation and the Organic Law on Data Protection.

4.4.- TRANSPARENCY IN MANAGEMENT AND INFORMATION

Transparency is one of the fundamental principles governing the work of the Eyes of the World Foundation, which is committed to being transparent in relation to its objectives and activities, as well as in relation to the administrative and financial management of the organization.

As a Foundation based in Barcelona, it is accountable to the Protectorate of Foundations of the Generalitat de Catalunya and complies with transparency regulations. As it receives public funds, it is subject to the Law of Subsidies and to the control of the national and international public administrations that grant such aids.

Additionally, the Foundation applies its own management transparency mechanisms in order to be accountable to its donors, collaborators and society as a whole. Specifically:

- Performs external audits of the organization's accounts.
- Through the website <https://www.ullsdelmon.org/en/>, social networks and available communication tools, Eyes of the World publishes relevant information on its activities, organization and operation. Specifically, the transparency section of the corporate website (<https://www.ullsdelmon.org/en/transparency/>) can be accessed, among others, for:

Organization

Mission, Vision and Fundamental Principles

Statues

Code of Ethics and Conduct

Strategic Plan

Transparent Accounts

Funders

Public Grants and Aid

Projects
Gender Strategy
Education Strategy for Global Justice
Annual Reports
Registries and Interest Groups

5.- DISSEMINATION, APPLICATION AND COMPLIANCE

5.1.- DISSEMINATION AND APPLICATION OF THE CODE

The Code of Ethics and Conduct will be made available to partners, collaborating entities, local counterparts, public administrations, networks and platforms, companies and any other institution and/or person who requests it.

The dissemination of this Code lies with the person responsible for the human resources management in the Foundation, as well as with the project coordinators in each of the territories where Eyes of the World collaborates.

The Code will be signed by employees (both at headquarters and in the field), volunteers, including members of the Medical Committee and Advisory Council, fellows and members of the Foundation's governing bodies.

5.2.- MECHANISMS FOR REPORTING IRREGULARITIES AND ABUSE

In order to prevent, detect, denounce and manage any type of misconduct, conflict of interest, fraudulent act or corruption, harassment or abuse, the Foundation relies on an **Ethical Behavior Committee**.

This Committee is composed of management personnel, who manage a specific email address for receiving reports or complaints (conductaetica@ullsdelmon.org), which can also be sent by post to Carrer Tamarit, 144-146, entresol 2^a, 08015, Barcelona.

The person responsible for human resources management receives and forwards the complaints to the Committee, which will proceed to gather as much information as possible in order to evaluate the situation and reach conclusions. External experts may be brought into the Committee, depending on the case and whenever deemed appropriate. If any member of the Ethical Behavior Committee is implicated in a reported case, they shall not participate in the evaluation of the reported facts.

In any reported misconduct, priority will be given to the safety of victims and complainants. Immediate attention and assistance will be provided to the victim.

Any alleged case of possible misconduct, conflict of interest, fraudulent or corrupt act, harassment or abuse by a member associated with the Foundation will be treated with the utmost confidentiality and objectivity in order to take the appropriate action, apply the corresponding sanctions (if so determined) and identify the necessary preventive measures to avoid recurrence. Regarding employees, the Collective Bargaining Agreement will be applied with respect to disciplinary proceedings, if applicable.

The conclusions and sanctions will always be notified to the complainant and the accused. The Board of the Foundation, respecting the utmost confidentiality, will be annually informed of the cases of inappropriate conduct, as well as of the resolution adopted.

5.3.- APPROVAL AND MODIFICATION OF THE CODE

In accordance with Article 14 of the Statutes, the Board or the Executive Committee is responsible for approving and amending the Code of Ethics and Conduct.



PRIVATE FOUNDATION EYES OF THE WORLD

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ANNEX 1: PERSONAL STATEMENT AND COMMITMENT TO THE CODE

I hereby declare that I have received, read, understood and accepted the principles and content of the **Code of Ethics and Conduct of Eyes of the World**, and I agree to work accordingly, and to apply and promote its procedures and practices while working or maintaining an association with Eyes of the World.

I understand that failure to comply with or abide by any of the principles and rules of Eyes of the World, while maintaining an employment, academic, professional or volunteer relationship with the Eyes of the World Foundation, may lead to immediate disciplinary action being taken against me.

Furthermore, I have no conflict of interest that could compromise my impartiality and independence with respect to my work, academic, professional or volunteer relationship with the Foundation. I agree to inform the Foundation's Ethical Behavior Committee, immediately and in writing, of any possible conflict of interest that may arise during the development of the relationship.

Full name:

Relationship with the Foundation (employee, employer, volunteer, intern, members of the Advisory Committee, members of the Medical Board, etc.):

Date:

Signature:

ANNEX 2: PRINCIPLES AND STANDARDS FOR MANAGING CONFLICTS OF INTEREST AND PREVENTING FRAUD AND CORRUPTION

Principles:

1. Prevention:
 - Establish controls aimed at reducing the risk of fraud, corruption and inappropriate behavior.
 - Prevent potential conflict of interest situations by proactively declaring any team member's conflict of interest statement to the Ethical Behavior Committee.
 - Team members affected by any change involving a potential conflict of interest will proactively amend the conflict of interest statement to ensure that it is properly registered.
2. Detection:
 - Any team member is responsible for proactively reporting potential conflicts of interest or cases of fraud or corruption of which they have evidence or knowledge of for investigation. This can be done through the reporting mechanisms established in this Code.
3. Management:
 - Once there is knowledge or evidence of a possible conflict of interest or a possible case of fraud or corruption, the Ethical Behavior Committee will make the necessary inquiries to clarify whether it is really a conflict of interest, case of fraud or corruption and, if applicable, will take the necessary measures.
 - Regarding the Board members, as established in the Statutes, they must communicate any potential conflict of interest they may have with the Foundation, before the governing body adopts an agreement that could involve a personal conflict of interest and a conflict of interest for the Foundation, providing the relevant information and refraining from intervening in the deliberation and voting.

Regulations:

The members of the Board and the persons indicated in article 312.9.3 of the third book of the Civil Code of Catalonia:

- Shall abstain from participating in business and financial activities that may compromise the objectivity in the management of the Foundation.
- May not participate in the share capital of corporations constituted or participated by the Foundation itself.
- Prior authorization from the Protectorate will be required for contracts of sale or lease of real estate or movable property of extraordinary value, money lending or provision of remunerated services with the Foundation.

For purposes of assessing the existence of a conflict of interest, the interest of the following persons shall be deemed equivalent to personal interest:

- In the case of a natural person, that of the spouse, that of the persons with whom they are especially bonded, that of their direct relatives and that of their collateral relatives up to the fourth degree of consanguinity or second degree of affinity, and that of the legal persons who exercise management functions or with whom a decision-making unit is constituted, directly or through an intermediary, in accordance with commercial legislation.

- In the case of a legal entity, that of its administrators or attorneys-in-fact, that of the majority of its shareholders and that of the entities which constitute a decision-making unit with it, in accordance with mercantile legislation.