

MANAGEMENT SYSTEM OF CISP

A. Management
Manual

B. Our values and
Code of behaviour

C. System for
verification and
safeguard against
unlawful acts

THE MANAGEMENT SYSTEM OF CISP

Introduction

CISP, in association with a variety of local, public, and private organizations, carries out humanitarian aid, rehabilitation, and development projects in Africa, Latin America, the Middle East, Asia, and Eastern Europe. In the countries that are members of the European Union CISP promotes initiatives concerning cultural policy, to promote international solidarity, training and university education, to fight against poverty in order to build an inclusive society, and to enhance the role of diasporae.

Therefore, the organizational and operational activity of CISP presents deep and diversified levels of complexity. On the one hand, our contexts of intervention present widely different cultures, traditions, and legislations; on the other hand, the interventions and activities of CISP are also complex and articulated into different sectors: economic development, education, healthcare services, construction, etc.

First and foremost, CISP adheres to the principles of transparency and accountability towards its partners, the beneficiaries of its actions, and all stakeholders involved in its programmes. Such principles are a constituent part of CISP's identity.

All CISP personnel must
know, apply, and abide by
the Management System.

At the same time, CISP must respond to a number of procedural and administrative requirements issued by the public and private donors it cooperates with, and from which it receives funds and contributions.

Finally CISP, as an organization founded in Italy, complies with the regulations governing the activity of non-profit bodies.

In order to take into account such a plurality of needs our Non-Governmental Organization (NGO) decided to provide itself with an updated and unitarian instrument: the Management System of CISP, made up of 3 sections:

- the Management Manual;
- Core Values and Code of Behaviour;
- CISP's system for verification and safeguard from unlawful activities.

Our Management System has been formulated and updated keeping into account the provisions of the law, and treasuring the recommendations received during reviews and audits carried out by the different donors of CISP both in Italy and in intervention countries. Therefore, all CISP personnel must know, apply, and abide by the Management System. Any doubt or difficulty about the application of it must always be shared with the Rome Headquarters of CISP, so as to find the most adequate solutions in order to apply our System consistently and appropriately both in Italy and in all countries wherein CISP operates.

All exceptions to the Management System that are deemed necessary for causes related to national legislation or other adequately justified causes must be agreed with and approved by the Rome Headquarters in writing. All documentation pertaining to the dispensations granted will be archived.

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A. Management Manual

A.0 Foreword and general information about the organization of CISP

1. The essential documents governing the actions of CISP both in Italy and in third countries are the Management System, the Code of Conduct for international cooperation programmes and the Declaration of Intent "For rights and against poverty." Every other document meant to regulate the organizational activities of CISP must be compatible with these documents, whose indications and orientations are binding.

2. The functioning of CISP is regulated by documents that may be periodically updated. The most important of such documents – besides the Management System – are the Statute, the Organizational Chart of the Rome Headquarters and, in each country where CISP operates, the Country Regulation and the related Organizational Chart. Country Representatives receive their powers of attorney from the Director, who is the Legal Representative of CISP. The President is the Political Representative of CISP. Geographical Area Managers/ Directors and their direct reports in Country Offices are appointed by the Managing Committee. Project Managers are coordinated by the Country Representative, who directly reports to the Geographical Area Manager/ Director and/ or to his/ her direct report at the Rome Headquarters.

Project Managers are responsible for the management of each project.

Geographical Area Manager/Area Director must promptly inform the Director and Legal Representative in cases described below:

- a. Opening of bank accounts
- b. Removal of a CISP local office
- c. Communication and/or visibility initiatives
- d. Termination of contracts for disciplinary or financial reasons
- e. Handing over of immovable property, vehicles or other considerably valuable goods in the projects or countries of intervention
- f. Any issue or aspect that may be considered relevant for the associational activity and the strategic perspectives of CISP.

2. Project Managers are responsible for the management of each project. In the event of more projects being carried out at the same time, without prejudice to this responsibility, the Country Representative supervises the operation of Project Managers.

3. It is advisable to include a Country Administrator in the staff of each Country Office. Direct contacts between local administrators and the Rome Headquarters are possible (for instance, in the case of explanations needed when the Country Representative is absent, of issues concerning fund transfers from Italy, of communications about exchange rates,

etc.,) but the Country Representative must receive information about all such communications. Generally, communications to and from the Rome Headquarters should then be sent to/from the Country Representative, and possibly a copy may be also sent to other members of staff.

4. The Director, the President, Geographical Area Managers/ Directors, Area Administrative Coordinators, and the Administrative Office at the Rome Headquarters all act keeping in close contact concerning the topics related to the financial and administrative dimensions of the activities and operation of CISP.

5. Unless otherwise indicated, the relations between Country Offices and the Rome Headquarters are conducted by Geographical Area Managers/Directors, who are the direct reports of Country Representatives.

6. As a rule, donors require the adoption of specific criteria for technical and administrative management, including reporting methods and procedures for the procurement and bargaining of services, supplies, and works. Such criteria and procedures are detailed in the contracts signed by CISP and/ or in the regulations governing the operation of the donors themselves. In any event, we recommend: a) to Country Representatives, Coordinators and project administrators, to read attentively all contracts and the corresponding procedures, and to keep up-to-date about possible modifications applied to procedures or management and reporting criteria; b) to Geographical Area Managers/ Directors and to Area Administrators to participate in the exam of said contracts and documents, and to provide the information needed and adequate support to Country Representatives.

7. Some donors consider taxes an eligible cost (among these special attention must be paid to VAT) only on condition that the project has already attempted in any possible way to obtain from the relevant institutions a dispensation or a reimbursement from the authorities of third countries, even if their national legislation does not explicitly provide for such measures. Generally, this is included in the contracts signed with such donors and it will be therefore be mandatory to follow such procedures (aiming at an exemption and/ or a reimbursement) with the relevant local authorities, and to archive the related documentation.

A.1 Planning and management of resources

SEE ANNEXES: A - B

1. The formulation and implementation of Budgets (or Financial Plans) are essential elements in the planning and management of projects. The Project Manager, in close coordination with the Project Administrator, formulates and sends to the Country Representative a Chart of Accounts (A) and a Financial Planning (B). The Country Representative will review the Financial Planning and send it to the Rome Headquarters, within the delay specified in point A.9.2.a.

BOX 1

Chart of Accounts and Financial Planning

A. The Chart of Accounts (see Annex A) defines the accounting codes for each item of expenditure of a project.

B. The Financial Planning (see Annex B) is structured on the same items of expenditure as the Chart of Accounts, and it contains data concerning the forecast of expenditure for each item on a monthly (or at least periodical) basis.

2. The Country Representative, especially when CISP is carrying out more than one project in his/her country, should also prepare and send for approval to the Rome Headquarters a Management Planning, including all cross-sectoral expenditure connected with the presence of CISP in the country and/or needed to enable CISP to operate adequately in accordance with local legislation. Such expenditure must be planned in order to secure a suitable coverage, which will be identified in close coordination with the Rome Headquarters.

3. All project and management plannings are subjected to progressive updates (at least twice a year) and to periodic monitoring by the Country Representative, GAMs, Area Administrators (AA), and the management of the Rome Headquarters.

5. To obtain a suitable coverage of expenses related to project activities, special attention must be paid to the formulation of projects and their budgets, with special reference to the following criteria: a. to provide for: i) a reasonable number of activities, compatible with the duration of the project, among other things, ii) the needed coverage of expenses for each activity; b. to always include the maximum amount of general expenditure acknowledged by donors; c. to convey in the logical framework some realistic indicators that may be reasonably attained in the defined timeframe.

6. We hereby exclude the possibility to provide loans or advance payments to ongoing projects, excepted when these are explicitly authorized by the Rome Headquarters.

A.2 Accounting and handling of supporting documents

SEE ANNEXES: C – D

1. Accounting procedures to be followed in Country Offices are influenced by the following criteria:

- To set up analytical accounts divided by project; where this is possible, it is advisable to open a specific bank account for each project;
- To use the Model 101 to collect supporting documents (see Annex C;)
- To handle accounting by using the spreadsheet software called “Prima Nota” “Prime Entry” (see Annex D);
- When this is requested, to send administrative documentation to the Rome Headquarters (see point A.9.2), including the scanned versions. Such documentation can be shared on digital platforms (OwnCloud, DropBox, or the like) so as to avoid the costs and issues related to shipment by carrier.

BOX 2

Ordinary activities to be carried out by each Project Manager or Project Administrator/Accountant.

1. Everyday or weekly activities

a. To check supporting documents, making sure that: i) they are directed to CISP (or another eligible body for the reference donor); ii) they refer to types of expenditure included in the Financial Plan (or Budget) and acknowledged by the reference donor; iii) unit costs and quantities do not differ much from those specified in the reference Budget; iv) invoices or quittances are correctly receipted.

b. To staple (not to paste) supporting documents onto the Model 101. Documents must not be put one on top of the other but juxtaposed, so that amounts, recipients and motives may be visible.

Several documents, if they are homogeneous and if the related amount is small (EUR 10 or less,) may be stapled onto a single Model 101, or onto other linked sheets, only specifying the last date. When one Model 101 comprises several attached documents, please include a swipe of the calculator containing all single amounts and their sum.

c. If the payment has been made through a bank, to staple on the Model 101 a copy of the cheque or of the accounting entry of the bank credit transfer. If the payment has been made in cash, to attach a voucher or till receipt¹, which must account for the approval of the cash payment.

¹ The most common models on sale in the country of intervention may also be used to this purpose.

- d. To fill out Model 101 with a part of the required data: Sequential number; Date (corresponding to the supporting document for expenditure;) Expenditure code, Ledger, Account and subaccount (as provided for in the Chart of Accounts;) Type of local currency; Amount in local currency; Income/Expense; Check-out/Bank; No. of cheque; Procurement procedure; Supplier, Beneficiary or Recipient; Description of the operation (in the working language of the country: French, English or Spanish) [see Annex C for further details.]
- e. To record single expenses in the Prime Entries, detailing the same data included in Model 101.
- f. It is important to make sure that:
 - i. Model 101 contains both the code and title of the reference project;
 - ii. The same format of Model 101 is used throughout the duration of a project;
 - iii. In Prime Entry, to verify that the same format for "Date" (dd/mm/yy) is used, and that the date is aligned with the calendar used in Europe even in the countries that have adopted different calendars.

2. Periodic (monthly or quarterly) Activities

- a. To collate Models 101 with supporting documents by payment month.
- b. To fill out Models 101 with data related to: Currency Exchange/EUR and Amount in EUR. This operation is performed on the basis of the exchange criteria adopted by the reference donor. Only enter the "Accounting Number" when the rendering of accounts is effected by the Country Office. In any other event, the number is assigned by the Rome Headquarters.
- c. To verify the conformity between Models 101 and the Prime Entry, and to perform a second check about the eligibility of the expenses incurred.
- d. To check out the Prime Entry and to perform its reconciliation with bank statements, as provided for in the format of the Prime Entry software.
- e. In the event of special operations (as for instance considerable cash payments,) it is necessary to integrate the Prime Entry with suitable explanatory notes.
- f. In the event of projects co-financed by DGCS-MAE, the "Description" field of Model 101 and of the Prime Entry are to be translated into Italian.
- g. To update the balances of the Financial Planning (see point A.1) concerning single projects and, if necessary, to introduce the relevant adjustments.
- h. To send on request the necessary documentation to the Rome Headquarters (see point A.9.2). This can be done either by physical shipment, or by uploading the digital documents in a cloud (e.g.: OwnCloud, DropBox).

A.3 Handling of local bank accounts

SEE ANNEXES: E

1. As a rule, the Rome Headquarters, following a consultation among the Geographical Area Manager in charge, the Administration and the Direction, authorize a Country Representative (endowed to this purpose with a special proxy of the Director) to open a local bank account. However, the Country Representative should promptly inform the Rome Headquarters about the opening of each new bank account.

Generally, the Rome Headquarters authorize the Country Representative to open a local bank account

2. The Country Representative, in cooperation with the Country Administrator or the Project Administrator, should also fill out a form (see Annex E) enabling the census of all open bank accounts, both those opened by CISP and (if this is unavoidable) by other entities, used to transfer funds from the Rome Headquarters to allow for the implementation of activities in the country of interest.

3. This form must be updated and sent to the Rome Headquarters every time a modification occurs (closing of bank accounts, opening of new ones, new subscribers, closure of a project, etc.) [see point A.9.2.g].

4. The Rome Headquarters must also receive the documents certifying evidence for all movements of funds (statements of accounts, accounting entries, etc.) [see point A.9.2.c/d].

A.4 Payments and transfer of funds

SEE ANNEXES: F

1. In each country a Register of Signatures must be set up, including: i) data concerning the persons authorized to sign cheques and/or payment orders; ii) their signatures; iii) their initials; iv) the maximum amounts they can handle and for which they have been authorized by the Country Representative or by the Rome Headquarters.

2. When handling payments for goods and/or services contracted on site, Country Representatives and Project Managers should abide by the indications received by the Rome Headquarters and by the expenditure forecasts contained in the Financial Planning (see point A.1) related to the project/s to be implemented.

3. Country Representatives have an obligation to effect a periodic monitoring of Financial Plannings, and to send the documents mentioned in the following point A.9.2 to the Rome Headquarters.

4. Even when suppliers have been selected by the Country Office, it is still possible to make payments from the Rome Headquarters through a bank transfer order approved by the Director and with a visa of the Administrative Office Manager (see Annex F). This is advisable in the event of considerable payments (over EUR 20,000).

The Country Representatives have an obligation to effect a periodic monitoring of Financial Plannings

5. All payments made by Country Offices must be registered in the Prime Entry and a copy of the related supporting documents should be sent on request to the Rome headquarters (see point A.9.2.c/d).

6. Cash payments must be limited to small amounts in exceptional cases (adequately explained and documented.) In any event, according to Italian legislation cash transfers equal to or over EUR 1,000.00 (one thousand Euros) are forbidden, even if they are split into lower amounts that may however be brought back to a single transaction from an economic point of view. Payments made through cheques or giro cheques, when they are equal to or over EUR 1,000.00 (one thousand Euros), must be personal and non transferable.

7. As concerns the management of on-site resources, an approximate agenda for transfers is agreed upon at the beginning of each project; their frequency is later defined on the basis of the duration and characteristics of the budget. Each transfer of funds must be requested to the Rome headquarters by e-mail, using the format "Request for funds or payments" (see Annex F.) In its absence, transfers cannot be made. Requests for transfer of funds must include as attachments the following documents related to the project: a. Prime Entry updated to the previous month; b. bank statement (or statements, when more bank accounts are used for the management of a single project) of the previous month; c. Updated Financial Planning.

A.5 Handling of purchases

SEE ANNEXES: G, H, I, K

1. Procedures to purchase and bargain goods, services and civil works are also defined by the Code of Behaviour, other than by the practical provisions subsequently indicated.
2. The procedures described in the “CISP Procurement Manual”, included in this chapter (pages 15-29) must always be followed without prejudice to the possible necessity to integrate them with the specific regulations of national laws or with further possible rules specified in the contracts and in the regulations issued by donors (for instance those related to the sources of assets).
3. Notwithstanding the need to comply with the regulations issued by donors and third countries it is possible, on grounds of urgency or other specific needs, to obtain from the Rome Headquarters an authorization to operate in derogation to the procedures mentioned in this Management System. Such requests must be formulated by the Country Representative, who will submit them to the Geographical Area Director/Manager who, following a consultation with CISP's Director and the Administrative Office Manager, will answer quickly (approximately within 48 hours.).
4. All materials related to the collection of donations must be kept, catalogued and put at the disposal of the Rome Headquarters (see point A.9.2.e), where it will be reviewed by the Area Administrator, in collaboration with the Director/ Geographical Area Manager and the Administrative Office. It is also recommended to:
 - Keep the envelopes containing the offers received;
 - Always assign an entry or exit protocol number to the correspondence concerning the management of the purchase procedures implemented.

Procedures for purchase and bargaining (...) are also defined by the Code of Behaviour.
5. In the event of direct implementation of small and cheap civil works (autoconstruction) that do not require negotiations with a construction company, their application is limited to the purchase of the needed goods.
6. Generally, the selection of offers must be performed by taking into consideration factors such as the price/quality ratio, the compliance with international regulations, delivery schedules, and by applying principles of transparency and equal treatment towards potential suppliers.
7. The values and regulations provided for in Section B (“Our Values and Code of Behaviour”) of this Management System must be kept in mind and accepted also by potential suppliers and implementing partners of projects, by signing the corresponding document mandatorily attached to contracts with suppliers.
8. The suppliers (of goods, services, and works) who are in one of the following excluding conditions are not eligible:

- a) They are bankrupt or being wound up, are having their affairs administered by the courts, have entered into an arrangement with creditors, have suspended business activities, are the subject of proceedings concerning those matters, or are in any analogous situation arising from a similar procedure provided for in national legislation or regulations, or a similar legal action is under way against them;
- b) They have been convicted of an offence by a judgment which has the force of res judicata (and thus not appealable) for any crime affecting their professional morality, even when the persons convicted are endowed with powers of representation, decision-making or control over candidates and tenderers involved;
- c) They have been guilty of serious professional misconduct, proven by any means which the contracting authority can justify;
- d) They have not complied with their obligations relating to the payment of social security contributions or the payment of taxes in accordance with the legal provisions of the country in which they are established or with those of the country of the contracting authority or those of the country where the contract is to be performed;
- e) They have been the subject of a judgment which has the force of res judicata for fraud, corruption, involvement in a criminal organisation, money laundering or any other illegal activity, even when the persons convicted have powers of representation, decision-making or control over candidates, tenderers or the applicants involved;

Contracts may not be awarded to candidates, tenderers or bidders who, during the procurement procedure:

- f) Are subject to “conflict of interest”;
 - g) Are guilty of misinterpretation in supplying the information required by the contracting authority as a condition of participation in the procurement procedure or failed to supply this information;
 - h) Are in any of the situations of exclusion provided for in the relevant procedure.
9. We would like to stress that, as a rule, all suppliers who have presented their bids have a right to attend the meeting during which the envelopes containing them are opened. To this purpose, they must be timely informed about the date, the time, and the place where the opening of the envelopes will occur. The time lapse between the publication of the tender and the decision concerning the awarding of the contract must be sufficient to allow for the participation of all interested suppliers.
10. The members of the committee will previously sign a declaration stating that they are in no way related or entertaining direct or indirect business relations with the suppliers who submitted a bid. CISP deems it absolutely necessary that the goods and services are exclusively purchased by qualified suppliers.
11. A basic procedure to make purchases would include:
- A Request of quotation addressed to one or more suppliers (see Annex G;).

- A Comparative table of the different quotations, with some comments on the final choice (see Annex H;)
- A purchase order filled out according to the modes of provision agreed upon (see Annex I;)
- The contract with the awarded supplier.

12. It is important to highlight that the overall amount indicated in the Budget and referring to the same type of expenditure cannot be artificially subdivided into several single purchases, to avoid adopting the applicable procurement procedure that becomes mandatory when the overall amount of the supply is considered.

13. If a request for quotation includes more than one item, it is advisable to specify that we reserve the right to select, within each quotation, only one or more of the goods offered under the terms specified. This can be useful in order to secure a greater flexibility in the choice of the goods presenting the best guarantees in terms of quality and price.

14. A specific contract must be signed with the supplier for every supply of goods and services that has required a comparison among offers and/or a tender. The Rome Headquarters may cooperate as concerns the drafting of single contracts on the basis of specific needs that may have been signalled by the Country Representative.

15. Generally, in doubtful cases, Country Offices must consult with the Rome Headquarters before making a purchase and/or awarding contracts.

16. Furthermore, for a better management of projects, it is advisable to formulate: a. at the start of activities: an outline planning of purchases identifying, with reference to the expenditure items of the related Budget: i) a forecast of the main purchases, ii) the characteristics of the national and local markets as regards the corresponding product sectors, iii) the outline time-frame and the procedures that will be followed for each purchase; b. when the project is underway: a synoptic table of the implemented procurement procedures, containing essential data about them, with special reference to the compliance with the procedures required by the reference donor. Anyway, even this table must be considered as a reference format, adaptable to the specific needs of the single Country Offices.

The procurement procedures to be followed in CISP's projects are contained in the "CISP Procurement Manual" and are described as follows.

A.5.1 CISP PROCUREMENT MANUAL

PURCHASING MANAGEMENT: PRINCIPLES, RULES, PROCEDURE

The management of purchases must conform to the regulations contained in the Management System of CISP. Moreover, it must ensure full compliance with local legislation in each country where project activities are ongoing, as well as compliance with obligations and procedures provided for by donors in each grant agreement, contract or other type of financing agreement. As a general rule, in the event that the procurement procedures of a donor differ from those provided for in the Management System of CISP, the most restricted procedures will be adopted. The present CISP Procurement Guidelines describe the basic principles and the steps to be followed to correctly implement the purchase of goods and services and the execution of civil works, illustrating the procedures to be followed and the segregation of duties that will have to be adopted in each local office of CISP.

Description of the contents

1. Code of Conduct
2. Responsibility as concerns purchases, functional levels, structuring of the committee charged with the evaluation of bids and for the awarding of contracts.
3. The suppliers' file and its periodical updating
4. Segregation of duties
5. Applicable amount thresholds and formal and informal competitive procedures
6. Procurement procedure
7. The different requests for offers: Request for Quotation/RFQ; Invitation to Bid/ITB; Request for Proposal/RFP
8. Bargaining
9. Payments and Receipts

1. Code of Conduct

- 1.1 The ethical principles, values, and rules that inspire CISP's Procurement Procedures are described in Section B of the Management System of CISP ("Core values and Code of Behaviour"). Such ethical principles must be adopted by CISP and also apply to potential suppliers and local partners involved in the implementation of projects: these principles will be mentioned in each supply contract.
- 1.2 The suppliers (of goods, services, and works) who are in one of the following excluding conditions are not eligible:

- a) They are bankrupt or being wound up, are having their affairs administered by the courts, have entered into an arrangement with creditors, have suspended business activities, are the subject of proceedings concerning those matters, or are in any analogous situation arising from a similar procedure provided for in national legislation or regulations, or a similar legal action is under way against them;
- b) They have been convicted of an offence by a judgment which has the force of res judicata (and thus not appealable) for any crime affecting their professional morality, even when the persons convicted are endowed with powers of representation, decision-making or control over candidates and tenderers involved;
- c) They have been guilty of serious professional misconduct, proven by any means which the contracting authority can justify;
- d) They have not complied with their obligations relating to the payment of social security contributions or the payment of taxes in accordance with the legal provisions of the country in which they are established or with those of the country of the contracting authority or those of the country where the contract is to be performed;
- e) They have been the subject of a judgment which has the force of res judicata for fraud, corruption, involvement in a criminal organisation, money laundering or any other illegal activity, even when the persons convicted have powers of representation, decision-making or control over candidates, tenderers or the applicants involved;

Contracts may not be awarded to candidates or tenderers who, during the procurement procedure:

- f) Are subject to "conflict of interest";
- g) Are guilty of misinterpretation in supplying the information required by the contracting authority as a condition of participation in the procurement procedure or failed to supply this information;
- h) Are in any of the situations of exclusion provided for in the relevant procedure.

- 1.3 The Verification System of CISP and the safeguard procedures against unlawful acts are described in Part C of the Management System of CISP. That section illustrates how to act in the event of offences such as frauds, corruption and any other kind of unlawful behaviour, with the related disciplinary measures provided for.
- 1.4 Every possible conflict of interest between professional assignments and personal interests must be avoided. The members of evaluation committees that examine procurement procedures in CISP's programmes will be asked to sign a declaration to state that they are not involved, directly or indirectly, in any business relation with potential suppliers.
- 1.5 The relations with suppliers and their representatives must abide by the following dispositions:
 - a. To provide identical opportunities to suppliers so that they may formulate their proposals for supply according to the required specifications;
 - b. To keep suppliers informed about possible new requirements;
 - c. If, for whatever reason, a supplier is allowed to reformulate his/her quotation, the same opportunity must be granted to his/her competitors. In any event, the reformulation of a quotation may only be accepted in exceptional circumstances;
 - d. No exchange of gifts or favours with suppliers will be tolerated.

2. Responsibility for purchases, functional levels, structuring of the committee for the evaluation of quotations and for the awarding of contracts

In every CISP Office, responsibilities for procurement procedures must be clearly identified and separated. The appointment of the following positions must be formalized:

- *Requestor*
- *Technical Evaluation Committee*
- *Procurement Unit*
- *Committee on Contracts*

2.1 The Requestor

A Requestor – usually a Project Manager – is the person charged with the preparation of the documentation that will be used to request bids for goods, services or civil works (Request For Quotations-RFQ, Invitation to bid-ITB or Request for Proposal-RFP.)

The Requestor is also responsible (by himself/ herself or in his/ her capacity as Head of a Technical Evaluation Committee) for the implementation of the technical evaluation of the quotations received, on the basis of the criteria contained in request documents.

2.2 The Technical Evaluation Committee

As concerns purchases for an amount equal to or over EUR 9,000, the technical evaluation of quotations will be performed by an *ad hoc* committee chaired by the Requestor.

The technical evaluation must be implemented according to the criteria illustrated in the request documents of quotations. The Technical Evaluation Committee will prepare and sign a form (Bid Tabulation Form) and an evaluation report, wherein the quotations sufficiently conforming to the technical specifications contained in request documents will have to be specified.

2.3 The Procurement Unit

This structure is responsible for the handling of purchases, with the following tasks:

- a) To review the request documents prepared by the Requestor
- b) To launch the procurement procedure (for instance, to disseminate procurement documents among the suppliers involved)
- c) To follow through the whole procurement procedure, ensuring that all persons involved comply with the regulations provided for and are in line with the Code of Conduct
- d) To actuate an exclusive channel for suppliers, through which all requests concerning prices, quotations, and products, including the correspondence with suppliers, will be handled: only the Procurement Unit and the Requestor (or persons previously authorized by them) may jointly establish a relation with potential suppliers
- e) To complete the evaluation of quotations (after the Technical Evaluation) by effecting an economic evaluation, and subsequently by expressing scores and calculating the final evaluation for each quotation. On the basis of this evaluation, the Procurement Unit will formulate the conclusive report, including a final recommendation about the supplier to be selected, which will be submitted to the Committee on Contracts
- f) The Procurement Unit will ensure a correct filing of documents related to the procurement procedures followed. At least the following documents must be collected, controlled, and filed for each purchase:
 - Dossier of the tender and receipts signed by the involved suppliers who received a copy of the dossier
 - Receipts documenting the submission of bids, dated and duly signed by each participant
 - Originals of the quotations received from suppliers, as well as other relevant correspondence
 - Minutes of the opening session
 - Technical Evaluation Report (including a detection grid)
 - Final Evaluation Report including the financial evaluation, with a duly justified recommendation for the assignment
 - Minutes and decision of the Committee on Contracts, when needed
 - Purchase Agreement
 - Shipping Documents
 - Customs Documents (in the event of an international purchase)
 - Receipts of beneficiaries and handover
 - Invoices and evidence of payment
 - Any other document and correspondence related to the procurement procedure and to the purchase agreement
- g. The Procurement Unit will archive all evidence related to possible anomalies that may have occurred during the procurement procedures. In this event, the Procurement Unit must prepare and archive a "note to the file." Support

documentation will be kept in such a way as to facilitate answering to possible future requests from reviewers or auditors.

- h. The Procurement Unit will provide updated information concerning the situation existing in the local market and about possible suppliers, so as to streamline the work to select suppliers to be contacted and asked for quotations or proposals. To this purpose, the Procurement Unit will keep a database of potential suppliers.

2.4 The Committee on Contracts

The Committee on Contracts – usually made up of the Country Representative and specially appointed persons – is responsible for the approval of contracts for purchases, services, and civil works.

The Committee on Contracts receives recommendations concerning the awarding of contracts from the Procurement Unit, and it ensures that the procurement procedure has been conducted in conformity with the provisions set out.

The Committee on Contracts will either accept or refuse the recommendations concerning contract awarding or even ask for further delucidations. The minutes of decision-making meetings will have to be prepared and kept in the tender dossier.

Members of the Committee must prove that they were not in a conflict-of-interest situation during the decision-making process. To this purpose, none of them may be involved in the Procurement Unit.

3. Management of the potential supplier database

Specific policies and procedures must be established in each Office of CISP for a correct evaluation, pre-qualification, and registration of potential suppliers, and the related file must be periodically updated.

The Procurement Unit must handle an updated database of potential suppliers who comply with some basic requirements. To this purpose, all potential suppliers will be asked to fill out a form ("Vendor Registration Form") that will be included in the database.

If an already used supplier has not filled out this form yet, he/ she will have to do it at the earliest suitable opportunity: then, the Procurement Unit will evaluate whether the supplier may be included in the approved suppliers' database.

An adequate suppliers' database should be constantly updated and contain, for each pre-qualified supplier:

- a. Full name and address
- b. Information about products
- c. Information about the way they usually organize their supplies (quality, delivery schedule, payment terms, guarantee;)
- d. Post-sale services;
- e. Packaging and delivery procedures;
- f. Data about the handling of previous supplies;
- g. References;
- h. Confirmation that the supplier is not included in any unwanted suppliers' list (United Nations, European Union, etc.);
- i. Results obtained during previous competitive procedures the supplier participated in and comments about previous supplies;
- j. Certified audited accounts of the previous three years;

In the event that a procurement procedure for a substantial contract is won by a supplier not included in the file, it is recommended to perform a pre-awarding survey as part of the technical analysis of the quotation. This survey will include data concerning the supplier's reputation, such as credit rating, possible franchisings, the expertise the supplier has shown in terms of technical requests, structures, experience, references, capacity, production equipment, personnel, etc.

4. Segregation of duties

In every CISP Office monetary thresholds must be established in relation to the different levels of responsibility assigned to the staff. Furthermore, a form indicating the amount limits to comply with during procurement procedures will have to be prepared. A copy of this form will be shown in the event of an accounting audit, and the dates of possible changes occurred in the levels of authorization will be registered. The authorization form must clearly identify at least two functions related to procurement procedures:

- a) The function of making purchases of goods or services (usually, Area Manager or Project Coordinators may decide about expenditure commitments up to EUR 20,000, whereas the approval of the Country Representative is necessary for expenditure commitments up to EUR 100,000.) As for expenditure commitments over EUR 100,000 a request for authorization must be submitted to the Legal Representative at the Rome Headquarters.
- b) The function of approving or making cash or bank expenses (usually, the Country Administrator or a person designated by him/ her).

In order to segregate duties from responsibilities and to establish adequate internal controls, each member of CISP's staff may only perform one of the two functions. Purchases and payments may not be sub-divided into several parts or delayed in time, so as to avoid the application of higher authorization thresholds.

At the beginning of each project the separation of duties must be formalized as described above and the related form will have to be filled out.

In some cases (for instance because of limited budget or of the features of an office or in special situations) some adjustments of the separation of duties may become necessary. Such changes must be agreed upon and approved by the Rome Headquarters.

5. Thresholds to be applied and competitive procedures

5.1 Expenses under EUR 400 (or equivalents)

The intervention of the Procurement Unit is not required. The Requestor may actuate the purchase.

5.2 Expenses under EUR 9,000 (or equivalents)

No formal competitive procedure is required, a Request for quotation may be sufficient. Notwithstanding this, it is necessary to ensure that the request procedure will be correctly followed up: quotations must be made in writing and they may be also be sent by e-mail, letter or fax. It is recommended to collect at least three quotations.

5.3 Expenses worth EUR 9,000 (or equivalents) and above

A formal competitive procedure is necessary. Contracts may only be formalized after a comparison among at least three different proposals.

In such events, both the Invitation to Bid and the Request for Proposal may be used.

The Invitation to Bid (ITB) is used to purchase goods, services or civil works with standards and/or specifications that may be expressed quantitatively and qualitatively. Quotations may be presented both in a single sealed envelope or in two sealed envelopes (thus separating the technical from the financial quotation).

The Request for Proposal (RFP) is used to purchase goods, services or civil works that may not be expressed in sufficient detail so as to allow for the use of an ITB. An RFP must include a technical quotation compliant with the features specified in the tender documents, and an economic quotation. The system of the double envelope must be followed in this case.

The recommended minimum number of suppliers to be invited is indicated in the table below:

Amount of the purchase (EUR or equivalents)	Required Documentation	Recommended minimum number of invited suppliers
400 < 9,000	RFQ	3
9,000 < 120,000	ITB or RFP	8
120,000 < 800,000 (for a single purchase or for several purchases)	ITB or RFP	12
> 800,000 (for a single purchase or for several purchases)	ITB or RFP	20 In case of procurement procedures for a very high amount (over EUR 800,000,) it is recommended to consult with the donor

5.4 Open Tenders

When required by specific provisions and/or by the contractual terms of the project, procurement procedures will be effected through a notice of open tender, which may be disseminated at the national (Local Open Tender) or international (International Open Tender) level.

In such events, the open procurement procedure to be applied is the one provided for in the contractual terms of the project, according to the amount limits therein specified.

At any rate, open procurement procedures with a notice of open tender are recommended as concerns goods and supplies, for amounts equal to or over EUR 100,000, as well as for civil works and services, for amounts equal to or over EUR 300,000.

5.5 Exceptions / Derogations

In case in some contexts and/or for some specific works, goods or services it is not possible to invite the above recommended number of vendors, it must be duly justified and documented the reason why the RFQ/ITB or RFP are addressed to a reduced number of potential vendors.

Notwithstanding the need to comply with the regulations issued by donors and third countries it is possible, on grounds of urgency or other specific needs, to request an exception (waiver) to the requirement of formal competitive bidding. In this case the Requestor or the Procurement Unit may ask approval for derogation to the CISP Country Rep (Committee on Contracts) who – if approves - will ask to CISP Headquarters in Rome the authorization to operate in derogation to the procedures mentioned in this Procurement Manual. Such request must provide valid justification and must be submitted from the Country Representative to the Geographical Area Manager who, following a consultation with the Director and the Administrative Office Manager, will answer quickly (approximately within 48 hours.)

Exceptions to the requirement to conduct a formal competitive bidding process, which must be kept to an absolute minimum, are allowed only when:

- a) Prices are fixed according to national legislation or by regulatory bodies;
- b) The proposed contract relates to procurement from a sole supply source of goods or services (e.g. sole authorized vendor) or to procurement of a proprietary product or service;
- c) Offers for identical products or services have been obtained competitively within a reasonable prior period, and prices and conditions remain competitive;
- d) The formal solicitation (Invitation to Bid or Request for Proposals) will not give satisfactory results, or when a formal solicitation done within a reasonable prior period has been unsuccessful, not giving satisfactory results (no qualitatively and/or financially worthwhile offer received);
- e) The procurement contract relates to services that cannot be evaluated objectively;
- f) Exigencies of service do not permit any delay due to waiting for the result of a formal solicitation. This applies to circumstances where goods or services are required immediately to prevent harm to life, health or well-being of persons of concern in situations of true emergency such as refugees and or others.

In the framework of UNHCR contracts, it is compulsory to obtain the prior approval by UNHCR on waivers of competitive bidding.

6. The Procurement Procedure

6.1 Identification of needs and Procurement Plan. A preliminary Procurement Plan will be effected at the start of each project singling out the following elements while keeping in mind single budgets and the related expenditure headings: i) The main purchases to be effected and the related available funds in the budget; ii) the features of local and national markets in the different product sectors; iii) the available timeframe to implement the procedures for single purchases.

6.2 Request. On the basis of the Procurement Plan drawn up and of an analysis of needs. The Requestor prepares the request documents (RFQ, ITB or RFP) and transmits them to the Procurement Unit for reviewing purposes;

6.3 The Procurement Unit reviews the transmitted documentation, approves it and launches the procurement procedure, or else it requests quotations and follows up their evolution.

6.4 A Tender Opening Committee is instated, including at least two representatives of CISP. The tender opening session will be held when the quotations received will have been administratively checked through (to ascertain, for instance, whether they may be considered legitimate with reference to the specifications contained in the Request for quotation.)

Proposals and quotations may never be opened, altered, revised or examined. Moreover, they cannot be labeled or damaged before the official tender opening session. Proposals and quotations received after the closing date will not be taken into consideration, as well as proposals and quotations received in unsealed envelopes.

Tenderers may not alter their proposals and quotations after the closing date. They may also be asked to provide delucidations about specific aspects of a quotation, but they are not allowed to make substantial price changes.

Before the awarding of a contract, no information concerning proposals and quotations, such as their rankings, the names of participants, etc., will be revealed.

Following the awarding of the contract, the decision will be communicated to all tenderers. Delucidations will be provided on request. No confidential information concerning any tenderer or participant, or persons not directly involved in the evaluation procedure will be divulged.

The minutes of the tender opening session will be drafted and signed, specifying the date and the hour when the session has been held, the attendants and their functions, the number of quotations received and the names of tenderers.

The quotations considered legitimate during the opening session according to the specifications contained in the request will be admitted to the next phase, that is the technical and financial evaluation.

6.5 Technical Evaluation. Proposals and quotations received on the basis of an ITB or RFP procedure will be submitted to the Requestor in order to perform the technical evaluation in a committee meeting, according to the criteria specified in the request documents. The Technical Evaluation Committee (usually chaired by the Requestor) will prepare and sign a technical evaluation form (Bid

Tabulation Form) and an evaluation report, and it will specify which technical quotations are sufficiently compliant with the technical specifications contained in the request documents. The scores obtained in the technical evaluation will be considered on the grounds of the criteria contained in the tender documents. Only proposals and quotations sufficiently compliant with such criteria will be afterwards transmitted, jointly with the evaluation form, to the Procurement Unit for the economic evaluation.

(In the event of purchases under EUR 9,000 - or equivalents - (RFQ), the technical evaluation will be directly effected by the Requestor or by a person designated by him/ her, and it will be communicated to the Procurement Unit.)

- 6.6 The economic quotation will be examined exclusively as concerns the proposals already deemed acceptable by the Technical Evaluation Committee, according to the system of the "double envelope" (one for the technical quotation and another one for the economic quotation, as it occurs for RFPs for civil works or supplies whose amount is especially considerable.) The evaluation is performed by the Procurement Unit, without involving those who participated in the technical evaluation.
- 6.7 The scores obtained during the technical evaluation will be made known to the Procurement Unit which will summarize them in a grid, detailing the quotations that have obtained a positive technical evaluation and those that have not, and including their scores. The scores related to the technical evaluation will be considered on the basis of the criteria mentioned in the tender documents (percentages between technical and economic evaluations.) The scores of the economic evaluation will also be enumerated (for each technically acceptable quotation or proposal) and a combined score will be calculated. The highest score will be assigned to the lowest bid. The scores for the other bids will be assigned proportionally to the lowest price quoted. The Procurement Unit will include, together with all supporting documentation, a declaration in writing related to the different factors that have oriented the final recommendation for the awarding of the contract. [In the event of purchases under EUR 9,000 (or equivalents) (RFQ), the comparison framework for quotations approved by the Procurement Unit, jointly with the supporting documentation, lays the foundation for the Procurement Unit's proposal for the awarding of the contract.]
- 6.8 The proposal for the awarding of the contract is transmitted by the Procurement Unit to the Committee on Contracts, together with all the documentation related to the procurement procedure and its evaluation, that is:
- Tender dossier with the forms signed by the suppliers involved who have received the mentioned dossier;
 - Summary Sheet of the quotations received, recording the date and hour when bids were handed over, duly signed by tenderers;
 - Minutes of the opening session;
 - Technical Evaluation Report (with grid);
 - Final Evaluation Report, including the economic evaluation and the recommendation concerning the awarding of the contract;
 - Quotations received;

- Other relevant documentation (correspondence, e-mail, etc.) If necessary, further specifications received by tenderers;
 - Text of the proposed contract.
- 6.9 Following the analysis and the checking of the above-listed documents, and with assurance that the procedure has been fairly brought to its conclusion, the Committee on Contracts will either accept or refuse the recommendation concerning the awarding of the contract. The minutes containing the decision of the Committee on Contracts will be drawn up and regularly filed, jointly with all other documents related to the same procedure.

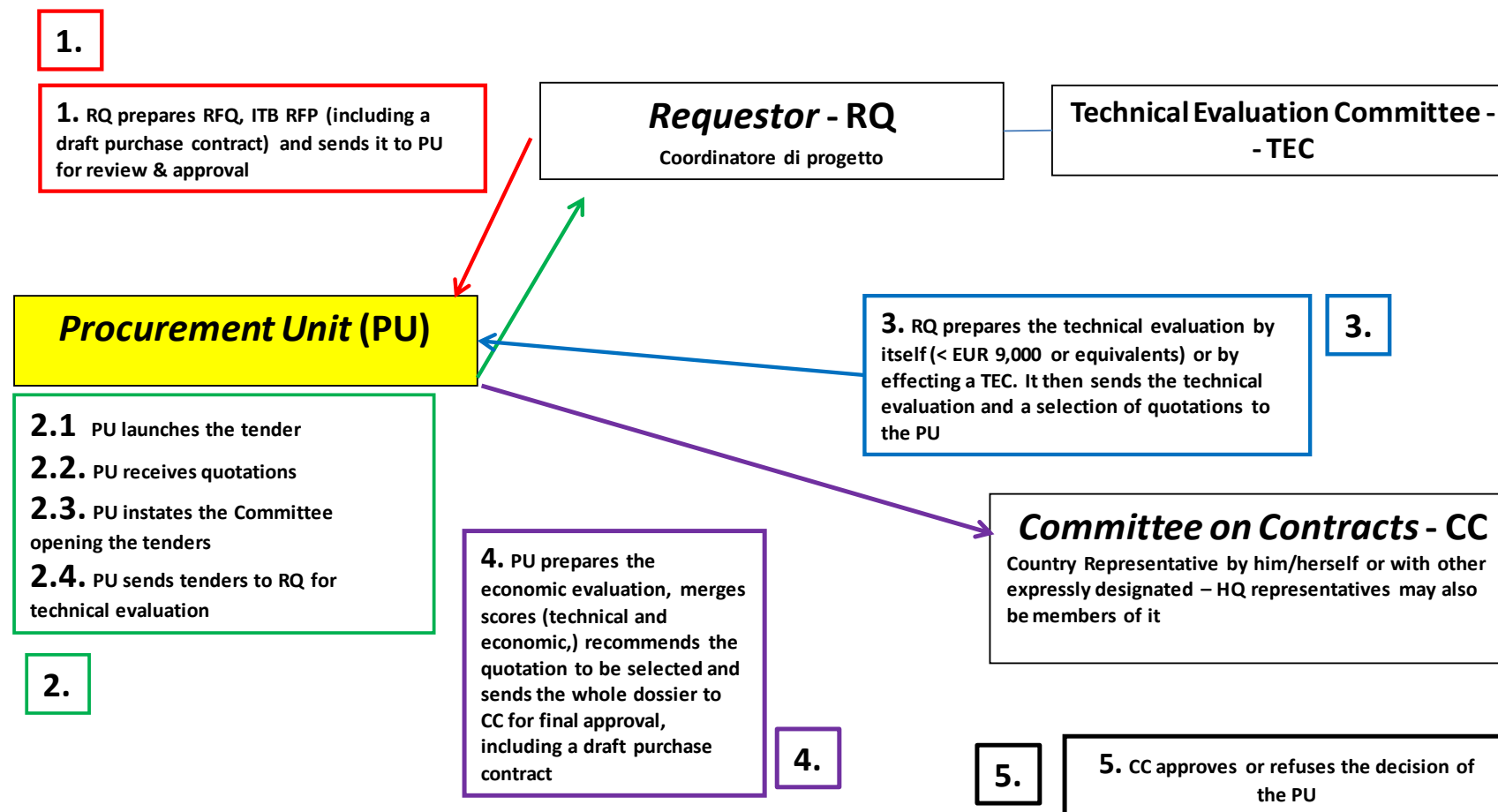


Chart of CISP's Procurement Procedure

(for amounts > EUR 400 or equivalents)

7. Official documents for requesting offers (Request for Quotation/Rfq; Invitation to Bid/ITB; Request for Proposal/RFP)

As a minimum, the following information must be made available:

- Necessary purchases and the grounds they are based on: short description of the objectives to be reached through such purchases;
- Accurate description of the requested goods, civil works or services, with enough details to allow for the preparation of the tender;
- Itemized list of bids or proposals, including economic ones, which must be produced in one or more sealed envelopes, specifying their contents. In some special cases it will be necessary to produce bids in two separate sealed envelopes ("Double Envelope System");
- List of the documents to be annexed to the bids;
- Declaration specifying whether the lack of some of the required documents – in this instance the missing documents must be specified – is a reason for excluding the bid from the evaluation. When this occurs, the Opening Committee will ascertain the presence or the absence of such documents and, as a consequence, whether the quotation will be considered unacceptable for the subsequent evaluation and thus rejected;
- Main criteria for the evaluation of proposals;
- Specification of the minimum score to be reached in the technical evaluation in order to be admitted to the economic evaluation;
- Date and hour before which proposals must be received; a reasonable length of time must be granted according to the complexities of supplies, civil works or services contracts to be awarded. Except for emergencies, as a rule at least 10 days must be granted for an ITB or an RFP;
- Validity Period of the Bid: it must be sufficiently extensive (usually 90 days) so as to allow for its in-depth evaluation, including requested explanations, if necessary, concerning any aspect of the proposal; the length of time granted must also be sufficient to obtain all necessary approvals, to award the contract and to sign it;
- Every specific contractual term must be separately highlighted, as for example the currency the quotation must be expressed in, whether samplings are to be supplied, whether some documents are mandatory or which tests will be performed in the laboratory;
- Contractual terms for the purchase of goods, services or civil works: the successful tenderer must accept the contractual conditions and terms proposed by CISP;
- The needed number of copies of the bid/ proposal;
- Performance security: a bank guarantee must be requested for contracts involving substantial amounts, contracts concerning civil works or especially complex contracts. Successful tenderers will produce this guarantee before the signing of the contract.
- The procedures participants must follow to request additional information about the tender: every potential supplier may request additional information by sending a request in writing as a letter, an e-mail or a fax. The answer and a copy of the request will be sent, simultaneously and in writing, to all potential suppliers, without revealing the name of the supplier who sent the request;
- If need be, an on-site meeting or visit may be organized (this especially applies to civil works) with potential suppliers in the event of an ITB or RFP procedure, in order to provide additional information and clarifications which could not be

easily delivered in writing. The on-site meeting or visit, to which all potential suppliers must be invited, will take place before the closing date of the tender. The minutes of the meeting will be made available to participants and other potential suppliers.

- The documentation of an ITB or of an RFP should also include a form to be filled out to formulate the quotation that suppliers will use, so as to facilitate the comparison among the quotations. The form will contain boxes that suppliers will fill out with the different components of the quotation, such as its currency, unit costs, discounts, and applicable taxes.
- Suppliers may be asked to include in the quotation an insurance policy concerning the goods that, are usually guaranteed against manufacturing defects because of their nature and price, including the warranty period to be provided for in the event of civil works.
- In order to evaluate and compare quotations, competitors will be asked to always use the same commercial terms.
- If necessary, in the ITB or RFP it will be required to also quote for the cost of the following additional services, separately from the cost of goods:
 - Shipping, insurance, and other expenses related to freight and delivery
 - Installation and testing;
 - Training;
 - Maintenance and repairs;
 - Maintenance manuals;
- Taxes and VAT, as well as customs duties and other import taxes, for in some States purchases may be exempt from taxes;
- Further information that may be requested in an ITB or in an RFP – especially as concerns services:
 - a. Warranty Period (insured by the supplier;)
 - b. Detailed description of the services included in the price;
 - c. Payment Schedules;
 - d. Request of references;
 - e. Request of references for the staff;
- If a request for quotation includes more than one item, it is advisable to attach to it a declaration specifying that CISP reserves its right to select, in the framework of each quotation, only one or several items;
- A declaration concerning CISP's right to either accept or refuse a quotation or proposal before the awarding of the supply, or CISP's right to cancel the tender and refuse all quotations received.

8. Bargaining Phase

Purchase Orders and Supply Contracts will be used to establish the contractual terms with suppliers.

The texts of contracts are jointly prepared by the PU and the Requestor.

The Requestor is responsible for the preparation of the Terms of Reference of contracts, as concerns their nature, measures, features, and delivery times, which should be defined in the documents of the request for quotation.

The Procurement Unit is responsible for the preparation of the documentation, including all contractual terms.

The necessary data in a Purchase Order or in a Contract are as follows:

- a) Number and date of the Contract;
- b) Pagination (for example, 1/3, 2/3, 3/3);
- c) Address of the supplier, contact person and telephone number;
- d) Reference Number of the supplier;
- e) Delivery and invoicing address;
- f) Business Definitions (Incoterms), if necessary;
- g) Shipping methods and transit route, if necessary;
- h) Delivery date;
- i) Contractual terms and conditions, including payment methods, specifications related to possible non-payments of taxes, customs duties, or other elements;
- j) Period of the contract;
- k) Possible penalties for infringements about contractual terms and conditions;
- l) Possible discounts for immediate payment;
- m) Number of items;
- n) Complete description of goods, works or services;
- o) Quantity, unit of measurement, unit price and total amount for each item;
- p) Total amount of the order;
- q) Reference number of the request;
- r) CISP / name of the supplier / area code and telephone number;
- s) Authorized signatures.

The quotation of the selected supplier must be annexed to the contract, as an integral part of the contract itself, so as to highlight – among other things – the provisions specified in the previous points h), n), and o).

As provided for in point 5.7., the Procurement Unit sends the text of the contract to the Committee on Contracts for approval, jointly with its awarding proposal.

Following the officialization of the successful candidate, the Contract is signed by CISP and by the supplier in two originals, one for CISP and the other one for the supplier.

Possible changes to the Contract may only be made in extraordinary cases and an Amendment to the Contract must then be signed;

Any modification of the conditions mentioned in the Contract must be approved by the Procurement Unit and recorded in the Contract itself.

Any modification (including cancellation) of an ongoing order or of a contract must be requested in writing to the Procurement Unit, which will consult with both the Requestor and the supplier. In no instance the Requestor may directly contact the supplier to alter an order or a contract. If the modification is approved, an amendment to the contract will have to be prepared whose heading must contain the wording "Amendment to the Contract" or "Modification of the Purchase Order". A written description of the changes made must be integrated into the contract and approved both by the Requestor and the supplier.

9. Payments and receipts

- 9.1 Following the delivery, goods, services and civil works will be accurately examined and/ or evaluated in order to check their conformity with the provisions contained in the contract. A "Receipt Report" will be prepared for each Purchase Order. This will be signed and dated by the CISP representative and by the supplier, and it will contain a declaration stating that the goods, services or civil works have been regularly delivered and they are in good conditions.
- 9.2 In the event of problems occurred during the delivery, adequate countermeasures will have to be taken. On the basis of the Receipt Report, payment procedures may take place consequently. Payments will only be made after the delivery and the thorough acceptance of the goods, construction works or services used. Payments will be effected according to the terms provided for in the Contract, after suppliers have delivered their invoice.
- 9.3 Advance payments are only admitted in exceptional cases and in specific situations. Their amount should not exceed 5% of the total amount of the Contract and it should not be over EUR 8,000 or equivalents without a previous authorization in writing issued by the Country Representative of CISP.
- 9.4 Interim payments may be provided for in the event of contracts with a duration of over two months.

END OF "CISP PROCUREMENT MANUAL"

A.6 Property, inventories, transfer of goods and closing statement

SEE ANNEXES: L, M, N

1. Every CISP office must adopt a method to register and control the property purchased. Although it is necessary to keep into account the differences due to single situations and countries, offices must apply a system allowing property to be identified according to the reference project. We suggest to use as a reference the form “Inventory” (see Annex L), which must be adjusted to single situations and approved by the GAM of the Rome Headquarters.

2. Furthermore, it is necessary to make a census of all vehicles owned by CISP (including those provided for projects.) The related data (see Annex M) must be sent to the Rome Headquarters, jointly with copies of the ownership documents.

3. In the event of construction works, the Country Representative has an obligation to obtain from the competent local authorities or other authorized bodies a test documentation or other documents certifying the adequate implementation of the works and of the construction. Such documentation must be requested and granted even in the event of the installation of machinery or operational equipment. The contingent costs of such activities will be appropriately integrated into the project budget.

The Country Representative must obtain a test documentation or other documents certifying the adequate implementation of the works and of the construction.

4. If, after the termination of a project, property owned by CISP is donated to local associations or communities, it is nonetheless necessary to confirm the ends and the reputation of the recipients by submitting the proposed donation and its handover document to the approval of the Rome Headquarters and, possibly, of the donors themselves. Moreover, these donations will of course be consistent with the commitments undertaken with donors. The related documentation must be kept and later sent on to the Rome Headquarters, jointly with supporting documents (see point A.9.2.d). As concerns vehicles or other property requiring ownership documentation, the transfer of ownership must be followed-up with great care and executed in full compliance with national regulations. The handover of a vehicle or property requiring a formal transfer of ownership may only be effected after the completion of the procedure required by the relevant provisions. Such procedure will be carried out by the Country Representative, possibly assisted by a lawyer and in close coordination with the Rome Headquarters.

5. Without prejudice to the specific provisions of the different donors, it is also recommended to draft and sign a simple statement about the termination of activities at the end of each project.

A.7 Handling of funds and property

SEE ANNEXES: N

1. The handling of funds and/or materials (e.g.: sent to expatriate personnel) is governed and monitored by using a specific set of forms (see Annex N), which is adjustable to single situations and must be archived in Country Offices.
2. As a rule, transfers of funds must be effected through a bank transfer from the Rome Headquarters to a local bank. Cash transactions are limited to cases of absolute necessity or urgency (for instance in the countries – or specific regions within their territory – that have no bank system operating, or where the existing banks do not offer sufficient guarantees) and they are always made in compliance with the maximum amount permitted by the foreign exchange regulations in force.

A.8 Selection, placement and management of human resources

1. CISP is first and foremost the whole of the people that work in a number of countries in order to attain their objectives and the success of the values held by the Organization.
2. Professionalism and adoption of the ethical principles and of the strategic objectives of CISP are essential requisites to work for the Organization. Every person working for CISP has an obligation to know and abide by the Code of Conduct concerning international programmes, the Management System, and the Declaration of Intent.
3. CISP thoroughly complies with the labour legislation in force in every country where it operates, and it ensures equal dignity and rights to all its collaborators and/or employees. The respect for the human person and the protection of the rights of a person are inviolable principles in any place where CISP operates. Under any circumstances, no discrimination in the workplace is tolerated.
4. CISP adheres to the principle that cooperation (or the development of relations based on mutual trust, respect, and collaboration) must find actual application within the Organization.
5. In no event CISP personnel, both expatriate or local, may take part in military or police operations. Expatriate personnel should also refrain from political activities in the countries where they work. Of course, local personnel is free to engage in constitutionally lawful political activities, but this must not happen in CISP's workplaces or working times, and it has to be in no way related to CISP's activities in the same country. More specifically, such activities must not be contrary to the activities conducted by CISP, they must not jeopardize the presence of CISP in the country, its reputation, and the security of its operators.
6. Without prejudice to the provisions described in the previous points, the criteria and methods for personnel selection adopted by CISP are modeled after transparency, the acknowledgment of competence, the suitability of the candidate to the role, and to non-discrimination. More specifically, CISP strives to ensure equal labour opportunities on the basis of gender, cultural and religious identity, and any other possible individual feature. CISP promotes the employment of disabled people (PWD) and protects their integrity and dignity in compliance with the principle of "reasonable accommodation". CISP applies the following methodology for personnel selection:
 - o Formalization of the required professional skills and of the Job Description.
 - o Research and acquisition of at least 3 Curricula Vitae through CISP's networks and contacts, or publication of a vacancy advertisement in the country where the selection takes place. In this last event, the process is considered correctly carried out regardless of the number of curricula received.

In no event CISP personnel, both expatriate or local, may take part in military or police operations

- o Establishment of a committee made up of at least three people already operating within the Organization to examine the curricula and, later on, to handle individual interviews. In the event that some potential candidates are related with one or more members of the selection committee, such members will be replaced so as to ensure the utmost transparency in the selection process.
 - o Final decision-making.
 - o Every decision concerning personnel to be hired in specific countries must always be approved by the Country Representative.
 - o Every decision concerning the selection of Country Representatives must always be approved by the Director and Legal Representative.
 - o Once the process described above is over, every non-selected person has a right to require from CISP an explanation in writing.
 - o The process outlined above is not necessarily recorded. However, in the event of requests from third parties, CISP is committed to reconstruct and document it.
- 7.
8. In addition to the general criteria already pointed out and without prejudice to the specific characteristics required for each professional, CISP adopts some general criteria for personnel selection. Those listed below are especially momentous:
- Professional and technical qualification, degree, knowledge of the working language in the country of destination;
 - Years of experience in the country and in the specific sector of employment;
 - Documented and certified managerial and administrative skills;
 - Knowledge of the procedures provided for by CISP's reference donors, particularly by those that support the specific project the candidate should work for;
 - Capacity for and inclination towards group work and the management of institutional relations.
 - Health conditions and physique suitable to the role envisaged. To this purpose, CISP may request a medical certificate issued by a competent authority (cf. point 3 and the following.)
9. CISP may consult with other bodies which the candidate has previously worked for, in order to acquire useful evaluation elements.
10. In order to enhance human resources CISP, in the event of a vacancy, may directly contact a person previously hired by the Organization in accordance with the procedures and the criteria described above.
11. All employment contracts stipulated by CISP have the following characteristics:
- Compliance with the national laws and provisions of the country where the contract is drawn up, including tax and social security obligations;
 - Unambiguous and formalized Job Description, which is an integral part of the employment contract;

- The inclusion of an adequate insurance cover, in line with the applicable legislation and with the levels of risk associated with the country and area where the candidate will work;
 - Existence of a clear-cut and documentable coverage of the expenditure associated to the employment contract.
12. As a rule, contracts with people who are citizens and reside in the country of employment are signed by the Country Representative. Possible exceptions must be authorized by the Director. An instance of such dispensations may be the situation of a citizen of a certain country who works as a Country Representative in the same. In this case the employment contract is stipulated with the Director of CISP.
 13. Generally, the contracts to be drawn up with expatriate personnel (that is personnel working in a country of which he/she is not a citizen or a resident) are stipulated by the Director of CISP, who may authorize possible exceptions.
 14. With the goal of protecting the integrity and the health of the personnel to be hired, CISP may request a certificate concerning their health conditions, in accordance with the legislation in force in each country. CISP will treat the data contained in such documentation in strict compliance with the principles of privacy, as codified in national legislation.
 15. With regard to the determination of wages and of possible benefits associated with the employment contract CISP adopts the following criteria:
 - National regulations existing in the country where the employment contract is drawn up;
 - Level of responsibility;
 - Years of professional experience;
 - Standards defined by the reference donor/s.

More specifically, concerning the personnel to be hired in Italy, CISP also adopts the following reference salary scales:

- For personnel to employed in Italy, the standards issued by CISP's Governing Council;
- For personnel to be employed abroad, the standards formalized by the Ministry of Foreign Affairs and by International Cooperation, and/or by the Agency established pursuant to Law No. 125/2014.

It is understood that the above-mentioned salary scales only represent a term of reference, and that the determination of the salary benchmark must be consistent with the budget at the disposal of the reference project and with possible regulations and/or usages of the donors involved.

16. As concerns the granting of "per diems" **to cover** costs associated with the employment contract, CISP takes as a reference the table set up by the European Commission.

17. Bank commissions and possible ancillary expenses requested by local banks to credit payments on site are however charged to the hired person.

18. Finally, CISP encourages all Country Offices to define, in agreement with the Rome Headquarters, specific salary scales associated to professional roles and consistent with national legislation. CISP is committed to enhance human resources by ensuring work environments where experiences and knowledge are exchanged, and where coworkers support one another.

19. In addition to the general criteria pointed out above, CISP adopts the following practices in the management of human resources:

- Whenever this is possible and appropriate, people operating for CISP in particular capacities are liable to get greater responsibilities in time, in the light of the experience and competence they have acquired;
- Whenever this is possible, appropriate, and accepted by the people involved, CISP favours the mobility of its personnel, both within the territory of one country and across different countries;
- CISP is committed to train its personnel through different methods. When missions from the Rome Headquarters are sent to intervention countries, refresher courses concerning the main dynamics of international cooperation are provided for the personnel working in those countries. Furthermore, CISP annually organizes regional, national or global conferences, attended by senior professionals in each country of intervention. These conferences serve as "training for trainers", since their participants are committed to transfer the knowledge acquired within their own professional scope and intervention country. The main topics tackled in such contexts concern: a) tools and methodologies for planning, management, and evaluation; b) policies and orientation of international agencies; c) geopolitical dynamics that may be of interest for CISP.

A.9 Relations among the Rome Headquarters, Country Offices and Projects

1. The contracts (or deeds that are however tantamount to an institutional commitment) with international donors are normally signed by the Director of CISP at the Rome Headquarters. In the event of contracts with national or international donors signed on site by the Country Representative, it is nonetheless indispensable: i) to obtain a previous authorization from the Rome Headquarters; ii) to promptly send to the Rome Headquarters a copy of the contract signed (or a copy of the equivalent document) and of other institutionally relevant deeds (amendments or equivalents, etc.).
2. Each Country Office must prepare or update the following reports and documents for all projects underway, regardless of the procedures followed to take on the initial institutional commitment. Such documentation must be sent to the Rome Headquarters and to the Area Administrative Coordinator in charge, according to the following provisions:
 - a. Charts of Accounts and Financial Plannings of the single projects must be sent, in their first reading, before the end of the first month of activity of a project. Subsequently, only updated Financial Plannings will be sent on request to the Rome Headquarters;
 - b. Scrap Books of the single projects must be sent, if requested, by e-mail on a monthly basis;
 - c. Quarterly accounting of the single projects, with the original supporting documents or copies thereof (in accordance with the obligations provided for by the national legislation of each country,) if possible scanned (if this was agreed upon with the Rome Headquarters,) including the statements concerning bank transactions. The same applies to contracts, procurement procedures and procedures for the selection of suppliers, job descriptions and curricula vitae of local personnel; these must be sent by carrier, if so requested, every three months;
 - d. Intermediate or final reports, with the original supporting documents or copies thereof (in accordance with the obligations provided for by the national legislation of each country,) if possible scanned (if this was agreed upon with the Rome Headquarters) are to be sent on request, before the end of the first month after their contractual maturity date;
 - e. The documentation concerning the management of purchases (outline planning of purchases, synoptic table of the procurement procedures carried out, procurement procedures implemented, etc.) is to be sent on request to the Rome Headquarters;
 - f. The inventory of property will be sent yearly, at the closure of every single project, or following a request of the Rome Headquarters;
 - g. The Census of bank accounts and the Census of vehicles are to be sent yearly, at the closure of every single project, in the event of any modification of the previous situation, and when it will be requested by the Rome Headquarters.
3. The missions of the Administrative Office will include inspections concerning, among other things: Inventories; Accounting and accounting documents; Management of financial resources; Application of local regulations and of the provisions specified by donors; Bank accounts.

A.10 Relations with Partners

CISP carries out projects and cooperation actions in partnership with public, private, non-profit, and profit operators, without any restrictions as regards their orientations in terms of culture, race, religion or political creed, provided that these are not contrary to the values, goals, and objectives of CISP.

Within this framework, cooperation relations must be based on some prerequisites such as: respect, reciprocation, collaboration, transparency, integrity, professionalism, and honesty.

Partnerships influenced by such principles are the very foundation of CISP's work, as well as the main success factors of any initiative or project pursuing the goals and the mandate of CISP.

During the selection process of a partner for the implementation of activities, initiatives, and projects it is necessary to make sure that such partner/s does not fall under one of the types of ineligibility already listed concerning suppliers in point A.5-10. Therefore, it is recommended to perform periodic checks in order to single out possible modifications and/or developments of the situations of active and potentials partners.

Based on this assumption, the essential aspects to be taken into consideration during the drawing up of a partnership agreement are outlined below:

1. Identification of the parties and highlighting of shared values and objectives
2. Goals and contents of the reference cooperation and/or of the project, including donor/s
3. Duration and prospects of extension
4. Roles and commitments of the parties both at the operational and at the financial level
5. Governance system of the agreement and establishment of a contact group and a management group
6. People in charge of handling the agreement
7. Process followed for possible funding/money transfers and administrative audits provided for
8. Formal annexes to the agreement and their priority order. In this section are normally annexed possible contracts with reference donors, which are integral and binding parts of the cooperation agreement. In any event, the parties take on themselves the commitments undertaken with donors, regardless of the person who signed these last formal deeds and/or grant contracts
9. Confidentiality clause
10. Protection of intellectual property

11. Dispute-settlement procedures and likely competent jurisdiction, if a consensual resolution cannot be obtained. However, it must be pointed out as the first option
12. Date of signature and autograph signature of the legal representatives. Representatives are authorized according to the procedures adopted by the parties.

Each agreement will be formulated keeping into account the specific situation in which the cooperation relation is realized, by referring to: the legislation of the intervention country, the characteristics of the relation and of the initiative to be carried out, possible constraints or formats imposed by donors, etc. Before signing any partnership agreement it is necessary to get the approval of the Rome Headquarters, which may cooperate in the drawing up of the agreement itself. Such authorization will be issued in writing by the reference Director/ Geographical Area Manager, following a consultation with the Director or the Administrative Office.

A.11 Internal Audit

The Director may arrange for the deployment of an internal audit mission, which is to perform inspections and checks concerning the administrative and managerial activities carried out in Country Offices and at the Rome Headquarters. The objectives and the organizational and operational procedures for internal audits are indicated as follows:

1. Objectives

General Objectives

- a. To improve the quality and efficiency of projects and other activities implemented. In point of fact, a correct use of available resources enables us to improve the quality of the work done, and to enhance its impact.
- b. To increase transparency towards donors and other institutions involved, in compliance with and in application of the commitments undertaken through the Accountability Charter signed by CISP.

Specific Objectives

- a. To confirm knowledge and correct application of administrative and managerial procedures (both those provided for by donors and CISP's internal procedures) in force. The application of such procedures is, as a matter of fact, an essential condition for the management of the project cycle, and for an effective and efficient work organization.
- b. To identify possible issues (concerning training or organizational aspects, etc.) and to formulate recommendations such as to direct the actions and innovations (organizational and operational) that are likely to solve them.
- c. To implement training activities in order to prepare the personnel for external audits that may be despatched by donors or other bodies (local authorities, etc.)

2. Organizational and operational procedures

- 1) The Internal Auditor is selected through a competitive process involving at least three people endowed with suitable and acknowledged competences and professional qualifications. The selection process will be organized and managed by the Administrative Manager in cooperation with the Direction of CISP. The selection of the Internal Auditor will be effected and approved by the Governing Council, which will then appoint the Internal Auditor selected.
- 2) The Auditor has no operational responsibilities in the internal managerial processes related to projects and he/she will report to the Director.
- 3) The scopes of internal audits may be both the organization and the management of single offices in third countries and the organization and management of services and functions at the Rome Headquarters.
- 4) The Director, the Administrative Office Manager, and the Governing Council, in concert with the other functions of the Rome Headquarters, respectively decide which offices located in third countries and which functions at the Rome Headquarters are to be audited. Moreover, they ensure that the Internal Auditor has quick, complete and unlimited access to all the documentation necessary to

- perform his/her task. The Internal Auditor receives his/her operational mandate from the Director and carries it through on the basis of the terms of reference defined during the selection stage.
- 5) The Internal Auditor formulates his/her evaluations and recommendations in a totally independent way.
 - 6) The audit process has an indicative duration of 60/75 days and it begins with a communication of audit start from the Director, sent with a reasonable advance to all concerned parties. The communication contains the details of the process and requests the handover of a determined quantity of information to the Internal Auditor.
 - 7) The audit is divided into two parts: the former concerns the review of organizational and managerial procedures, and it is focussed on inspections and internal procedures. It is carried out through the previous filling out of a questionnaire, interviews and accurate checks. The second part consist in a verification of accounting and administrative documents related to: i. a certain number of implemented projects (in the event the audit takes place in an office of a third country); and/or ii. implementation of services or operational functions (in the event the audit takes place in the Rome Headquarters.)
 - 8) If the audit is carried out in a third country office, the parties concerned are: the Country Representative and the Administrator of the country of interest (if the role of Administrator is existent in said country;) the Geographical Area Manager (or another direct report of the Country Office subjected to audit), and the Area Administrative Coordinator; the Administrative Office Manager (as well as the operators of the units involved.)
 - 9) At the beginning of the audit a presentation meeting is held with the Country Representative in the country subjected to audit (or with the Manager of the service subjected to audit at the Rome Headquarters), and with other possibly involved actors.
 - 10) When the audit is under way, the Internal Auditor will have a meeting with the main parties concerned to examine the drafts of the review tables for single projects (or services) already produced. In such a context, it is possible to produce facts and documents that may alter the Internal Auditor's evaluation concerning the documents examined.

A.12 Management of Country Offices and of their equipment

1. In order to optimize efficiency and transparency in the management of the different offices (both in Italy and abroad,) these must adopt an Internal Regulation. The personnel – both local and expatriate – whose roles imply important responsibilities must be involved in the definition process of such regulation. Before its adoption, the Regulation must be agreed upon and approved by the Rome Headquarters. While taking into account local peculiarities, the dimensions of the staff and of the different legal reference contexts, such regulations are influenced by some common criteria indicated below.
2. As a rule, every internal regulation includes the following sections: a) use of workspaces and equipment; b) use of transportation means; c) criteria and procedures for the selection and management of personnel; d) distribution of roles or general functions of the operators; e) protocol and filing system, both on print and computer; f) procedures for the authorization and handling of expenses and purchases; g) provisions for the security of the personnel.
3. Without prejudice to the general responsibilities described in point A.0, internal regulations must clearly specify at the operational level the functions, responsibilities, and powers concerning: a) authorization of expenditure; b) authorization of purchases; c) handling of bank accounts; d) handling of cash pools; e) selection, employment, and management of personnel; f) production of balance sheets and financial reports. In any event, the assignment of such responsibilities must be made in compliance with national law, donor provisions, and with the Management Manual.
4. The premises and equipment owned by CISP (vehicles, computers, mobile telephones, other inventory and consumer items) are supposed to be used exclusively for the goals of the Organization. Any other use, including for personal purposes, must be previously authorized by the Country Representative; however, the related costs (fuel, etc.) will be charged to the person concerned. This criterion also applies to the use of the Internet, which must be regulated on the basis of working needs.
5. Any damage to CISP's property, if it is due to negligence or caused by an individual, entails the obligation of a financial refund to CISP. The use of vehicles and equipment must always be made in accordance with local regulations (for instance: the kind of driving licence necessary in a specific country.)
6. The choice and arrangement of the premises for Country Offices must be based on the following criteria: economy, security, functionality, and image. The first criterion can be summed up in the search for inexpensive solutions: any monthly rent for an office implying an expenditure of over EUR 500 must be previously agreed upon with the Rome Headquarters. The criterion of functionality translates into an arrangement of workspaces aimed at ensuring the carrying out of activities. As a rule, each worker operating in the office must have a permanent space, equipped with a desk and a computer, so as to avoid a constant mobility of personnel within the office. Lastly, as regards image, it is recommended to use and keep offices tidy, to avoid locating them in "exclusive" areas, which would be inconsistent with the identity of an NGO operating to support the poorer sectors of the population. Areas where security is scarce, or exposed to considerable public order issues, should be avoided as well.

7. Every office must set up a system for the maintenance of the premises and of the equipment therein contained. In any event, it is absolutely necessary to avoid the persistence of unrectified defects that, besides reducing the efficiency of the office, have a bearing on the image of the organization. The maintenance system must include a periodic check of transportation means and computers, with special attention to the updating of anti-virus software. It is also advisable to supply Country Offices with the equipment and procedures needed to ensure the backing up of computerized instruments wherein electronic documents of great importance (both at the managerial and administrative levels) are archived.
8. The management of offices, equipment, and especially human resources must conform to criteria aimed at safeguarding security and integrity. For instance, it is best to avoid long commuting and activities in dangerous areas in the absence of the due preventive measures and, when this is required, in the absence of explicit authorizations from national and/or international bodies. Every CISP office must be equipped with a code and with security procedures, which must be known and applied by the personnel and/or the collaborators working there.
9. Each office must actually represent the international dimension of the Organization, even through the exhibition of documents and materials related to CISP projects implemented in the different countries wherein it operates.
10. Every office must be equipped with a protocol system and with a functional and efficient system for paper and computer filing, in order to allow for the documentation and the full traceability of the operations carried out, as well as to simplify the execution of internal checks, both locally and by the Rome Headquarters. This system should also facilitate the recording of the historic memory of the activities implemented by CISP in the country of interest, and thus allow for the immediate operativity of the new collaborators.
11. Each office must have at least a local legal contact, who will contribute to sketch out the contracts of local personnel, the definition of CISP's institutional and legal status, and other possible issues that are especially relevant in the different countries.
12. When this is not impossible or not provided for in the local legislation, CISP usually asks local authorities to be registered as an international (Italian) NGO with headquarters in the hosting country. The related preliminary activity must be carried out jointly with the Rome Headquarters, where a certified copy of the registration and of its possible updates must be sent. Any other form of registration influenced by local circumstance, including the foundation of a local entity, must be agreed upon with the Rome Headquarters.
13. On the basis of specific needs and/or national regulations, it is possible that a Country Office adopts a particular accounting programme. However, such a choice must be previously communicated to the Rome Headquarters, and especially to the Administrative Office and the Area Administrator.

A13. Institutional image and communication strategy

SEE ANNEXES: O

1. The institutional image and the visual identity of CISP may be a tool to consolidate an adequate relationship with the external national and international context, since we are convinced that it is possible to communicate values, style, reliability, and innovative capacity starting from the image we present.
2. To this purpose CISP has formulated a coordinated corporate image manual, containing the most important indications concerning the features and the management of our corporate image (Annex O), including the logo of the Organization, the dimensions and colours to be adopted, the letterhead format, business cards, and other elements of the corporate image.
3. On a yearly basis, CISP may define a corporate communication strategy and/or specific strategies for single initiatives, which will be shared with the whole staff.
4. CISP's Country Representatives are supposed to make sure that both the local office and the single projects are in accordance with and represent a suitable application of the indications concerning visibility and communication, by taking as a reference the already mentioned coordinated corporate image manual and the related provisions that will be disseminated from the Rome Headquarters.

A14. Regulations concerning security

1. Introduction

- a) One of the primary objectives of CISP is to promote a positive and sustainable over time impact in all geographical areas and sectors of intervention through projects or single activities.
- b) CISP believes that this may only be achieved through a serious and consistent investment policy for human resources of any level.
- c) In this perspective, one of the main factors is the safety of the human resources involved in the activities and of their working environment.
- d) To protect the life and safety of the personnel employed by CISP in several capacities in the countries where it operates is an absolute priority. It is therefore our overriding and crucial concern to always apply all measures needed to prevent endangering the safety of the personnel employed by CISP and to ensure their security in every situation.
- e) At the same time, CISP ascribes fundamental importance to the security of beneficiaries and of the people and communities with whom and for whom it operates. In concrete, this priority is reflected in the definition of operational plans that avoid exposing the community to risks to their own security. An example of this may be a food assistance plan in the context of an armed conflict: this should be accurately planned so as to avoid to expose the beneficiaries of the aid to retaliation and violent extortion.

2. Definition.

The concept of security is identifiable in the point of balance provided by a comparison between the necessity of interventions to meet the needs of the targeted populations and the level of risk to which the human resources employed are exposed.

Furthermore, there is another dimension that CISP takes into account, concerning health safety and access to assistance in case of need (*safety*).

In reference to both the above-described dimensions, some general and specific indications are formulated below.

3. General Indications.

- a) Although it must be stressed that CISP operates in different areas and sectors, basically promoting interventions aimed at substantially and sustainably improving the lives of people, thus seeking to achieve the objectives defined for every project, the upkeep of a considerably high level of security for CISP operators remains a priority.
- b) Some general indications are given below, which are meant to foster the preservation of a relaxed atmosphere and of a convenient working environment:

- o Upkeep of balanced relations with the different counterparts and/or delegations of ethnic groups/clans.
- o Respect for the cultural and religious characteristics of the society and of the working environment of interest. More specifically, such respect must be shown in suitable clothing, in the formalities of relations, in the way operators express the positions held by the organization they represent, as well as in their behaviour even outside the working environment or times.
- o Compliance with the regulations, laws, and provisions in force in the society and in the area of operation.
- o Compliance with the indications provided for by donors and by the coordination with other organizations.
- o Designing, wherever this is possible, of ways to reach coordination with the other (local and international) organizations operating in the same sector or geographical area about the definition of common positions in the management of specific aspects (for instance, the emoluments for local personnel.)
- o Compliance with the agreements and the prearranged objectives. In the event these should be modified this must be communicated to the Rome Headquarters to explain the causes that have made such modifications necessary.
- o Transparency in the carrying out of activities (especially when it implies the proactive involvement of local delegations with conflicting leanings.)
- o Constant and widespread involvement of local communities, since the earliest identification stages until the evaluation of impacts.
- o Equalitarian approach in relations and dealings with different segments of the population, supporting especially the most vulnerable (without prejudice to the compliance with the formalities required by the different societies and working environments.)
- o Keeping a neutral attitude in the face of conflictualities and/or differences of opinion/position at the local level.
- o Upkeep of hygienic, sanitary, and logistic provisions so as to avoid as much as possible the risk of diseases or accidents.

4. Specific Indications.

- a) All CISP Country Offices must prepare a Code of Security to be approved by the Rome Headquarters. The code will be reviewed and re-approved at least every two years, without prejudice to the possibility of updating it at any time in response to altered security conditions. The process of its preparation and review will be followed-up by the reference Director/ Geographical Area Manager in coordination with the Director and the Administrative Office of CISP. The code will be approved by the Director of CISP.
- b) Notwithstanding the Code of Security adopted by every office, including specific provisions according to the attention required to maintain an high level of security for personnel engaged in the activities, some specific indications that may contribute to the attainment of the above specified conditions are listed as follows:
 - o Implementation of short orientation courses concerning personnel security.
 - o Identification of pathways and accurate processes for the management of security and of possible evacuations.

- Identification of a definite report for security operations (also to collect information on site).
- Prohibition to transport militaries or people directly engaged in military activities, armed persons and representatives of warring factions.
- Prohibition to host militaries or people directly engaged in military activities, armed persons and representatives of warring factions.
- Constant compliance with the regulations concerning circulation (curfews, blocked ways, etc..).
- Clear-cut identification of the vehicles and of the abodes and workplaces of personnel.
- Clear-cut identification of personnel and of the different roles carried out through a presentation to local and international delegations present on site.
- Every local office must be equipped with a first-aid kit and adequate tools to extinguish possible fires. Training of staff for the use of such tools.

5. Communications concerning security in Country Offices and with the Rome Headquarters.

The Country Representative can always be reached by telephone by the personnel employed in Country Offices. If the Country Representative is traveling abroad or cannot guarantee his/her availability, he/she will formally appoint a colleague to be temporarily available for personnel in his/her place.

Every Country Representative, in the event of security issues, may contact the Rome Headquarters 24 hours a day, any day of the week; besides, he/she will be given the mobile telephone numbers of his direct reports.

6. Further provisions for risk management

- a) Risk management must also include the safeguard and handling of financial resources managed by CISP. In concrete, this entails the need of a clear-cut definition of roles and responsibilities of administrative personnel and of the personnel charged with the management of financial resources in the event of emergencies;
- b) If the personnel of a Country Office is not endowed with the necessary competence to set out adequate security plans it is possible, in coordination with the Rome Headquarters, to provide for an ad hoc assignment to an expert of the sector, who will be not only charged with the drawing up of the plan but also of the training of the staff;
- c) In specific instances where this is imposed by circumstances and by the protocols adopted by international organisms, in addition to what has been mentioned above, CISP personnel will abide by punctual indications, which may provide for measure such as the use of escorts, the interruption of activities in a given place, consultations with the Rome Headquarters before proceeding to implement missions in some countries and locations;
- d) Furthermore, CISP personnel also abides by the specific indications issued by reference embassies. At any rate, every person working for CISP must establish – through the Country Representative – a direct contact with his/ her reference embassy.

B. Core values and Code of Behaviour

B.1 Core values: the Code of Conduct and CISP's commitment to accountability.

All the organizational actors and the people working for CISP are called to respect, protect, enhance, and disseminate our legacy of values and principles governing the activity of the organization. Firstly, CISP defined a Code of Conduct which qualifies its operation as international cooperation agency. Furthermore CISP, even through its participation in the networks of Italian and European Non-Governmental Organizations, has contributed to the definition of binding obligations as regards accountability, meant as a commitment to give an account of the results achieved through its actions, and to the transparency of its own managerial and administrative activities.

B.1.1 The Code of Conduct (in force since April 7, 1997)

1. Projects are aimed at meeting the actual needs of populations. Accordingly, they are designed by taking into account the economic, social, and cultural features of the different contexts. This implies, among other things, to pay constant attention so that such projects are carried out in accordance with local cultures.
2. Cooperation praxis aims at enhancing ssible local technical, professional, and material resourcesas much as po. This implies, for instance, that the functions assigned to expatriate personnel must not demean or marginalize the roles and contributions of local personnel. On the contrary, they should work to promote and enhance their capabilities. The promotion of forms and actions of South-South regional cooperation also falls within such a framework.
3. Activities carried out in third countries are intended to strengthen, improve or, if necessary, to modify national intervention plans. However, in no event they can be conceived without taking such plans into account. As a matter of fact, cooperation cannot be superimposed or meant to replace local planning actors. On the contrary, only by acting in full accordance with the role played by such actors and by setting up a dialogue with them cooperation may achieve the authoritativeness and the consideration needed to negotiate – when this is necessary – the introduction of adjustments in local policies and intervention plans.
4. To guarantee highly effective projects attention must be paid to their identification, planning, monitoring, and evaluation. These activities are to be carried out in association with beneficiaries and the information developed within this context must be returned to them.
5. Professionalism is a fundamental criterion for conduct, which qualifies the relations CISP has established with the countries and the communities in which it operates and that represents a pre-requisite for the success of effective relations based on cooperation and mutual respect.
6. Notwithstanding the principle of non-interference in the political and religious life of third countries, it is advisable to promote - even through specific operational collaborations - the role played by institutions and bodies whose actual praxis contributes to development and democratization processes. Within this framework, it is especially

important to enhance the role played by women's associations and by associations defending the interests of small-scale producers and other marginal actors (refugees, indigenous communities, ethnic minorities, etc.).

7. For reasons of transparency local governments, partners, and communities must be informed about the sources of the funding that allow for the implementation of specific projects.

8. Projects are supposed to be managed in such a way so as to ensure their economic, social, and institutional sustainability, as well as the lasting benefits they have produced. Their management must also take into account the need to optimize the use of financial resources, so that these may benefit local populations as much as possible.

9. Actual coordination among international cooperation agencies and bodies and the institutions of beneficiary countries is a remarkable tool for more effective actions and policies. To this purpose, CISP guarantees its willingness to make available the information concerning its own activities.

10. With regard to humanitarian actions aimed at overcoming complex emergencies, CISP adheres to the Code of Conduct issued by the International Committee of the Red Cross which establishes, among others, the following principles: universal right to humanitarian assistance, without constraints related to ideology, religion, race, gender or other considerations; political and operational independence of interventions so that they may not end up supporting a determined faction, especially in situations of conflict; respect of every person's rights, as defined in the Universal Declaration of Human Rights.

B.1.2 The commitments undertaken according to the Accountability Charter signed by CISP (on October 16, 2013)

B.1.2.1 Legal, organizational, administrative, and financial standards

CISP retains as binding some essential organizational, legal and administrative criteria such as: (i) separation – of roles, powers, and responsibilities – between the governance and managerial scopes; (ii) transparency and traceability of power and responsibility lines; (iii) clear-cut internal mandates and roles, and existence of an organizational chart; (iv) publicity of the information related to management teams.

In accordance with the principles mentioned above, CISP undertakes the commitment to establish: (i) a Governing Council charged with tasks and powers of supervision concerning the activities of the NGO, of evaluation concerning the operation of managers and operators, of monitoring concerning the compliance with the management and internal supervisory systems adopted; (ii) a clear-cut definition of the powers of the membership base. To this purpose, a general meeting will be held at least once a year, aiming at a free, open, and binding debate about the NGO's policies and strategies.

The operation of members of the governing bodies provided for in the Statute of the Organization is characterized by the fact that they carry out their monitoring, supervision, and orientation tasks gratuitously, as well as by the non-existence of any possible reason for conflict of interest concerning the activities implemented by the NGO.

CISP undertakes an absolute commitment to use the financial resources received from any source, both public and private, for the achievement of the goals and according to the procedures pre-determined and agreed upon.

CISP undertakes the commitment to formalize its management system, to act in accordance with it, and to monitor its application.

CISP undertakes the commitment to secure the cooperation of two different budgetary control authorities - a College of Auditors and an independent certification body - for the verification of its annual accounts.

CISP undertakes the commitment to publish its annual accounts and to integrate financial data with a description of the activities carried out.

CISP undertakes the commitment to expressly indicate in the annual accounts some essential standards such as: (i) operating costs; (ii) the expenditure related to fund raising and the donations collected; (iii) the destination of possible surpluses.

CISP undertakes the commitment to make information concerning its activity and its annual accounts known to the general public, the media, and its partners.

CISP undertakes the commitment to comply with and to meticulously apply labour legislation in Italy and in the countries where CISP operates.

B.1.2.2 Measuring the effectiveness and impact of interventions

For CISP making accountability a central pole of its action also means, in addition to what has already been indicated as concerns legal, administrative and organizational standards, to undertake the following practical commitments:

- To make every possible effort in order to make the results of the projects implemented clear and ascertainable;
- To prioritize the measurement of the results achieved, through monitoring and evaluations;
- To prove that projects are carried out in accordance with rules, procedures and pre-determined regulations, and that they are aimed at the achievement of the results stated;
- To correctly report the level of achievement of project results, and to enable all parties concerned to access the information concerning their level of achievement.

CISP is aware that, for the above indicated commitments to be actually attainable, it is indispensable that every project is formulated with definite objectives, measurable results, practical indications concerning the process necessary to achieve results and objectives, the provision of mechanisms and monitoring tools to identify and correct possible problems.

In order to enhance the concreteness of the commitments listed above, CISP undertakes the commitment:

- To make project evaluation a central element of its international cooperation praxis;
- To post the results of evaluations on its website;
- To ensure that reliable information about project results will be provided to whomever requests it for a reason;
- To promote moments of discussion open to the general public about the results of evaluations.

The commitment to make public the results achieved by international cooperation initiatives is undertaken towards donors, institutions, the general public, governments, and partners in the countries where CISP operates.

B.2 The Code of Behaviour of CISP and its personnel

B.2.1 General Principles

A. CISP has always been engaged in the application of strict principles while carrying out its activities. It has made seriousness, reliability, and the correct operation of its employees and collaborators one of its main strengths; thus it has acquired over time a very good reputation, at the international level as well.

B. A totally correct conduct, in full compliance with the laws in force, is another feature of the operation of CISP. The regulations contained in this Code of Behaviour (hereinafter also referred to as the "Code") must guide all employees and collaborators in any capacity, ensuring as well the transparency of operations and behaviours put into effect by the organization.

C. Therefore, the provisions contained in the Code point out the principles and guidelines to be followed while carrying out the tasks and functions assigned, in Italy as in every country where CISP operates.

D. The compliance with Italian laws and those in force in the countries where CISP operates, with internal regulations, statutory provisions, ethic integrity and correctness is a constant commitment and a duty for all employees and collaborators, and it influences the behaviour of the whole organization.

E. The implementation of cooperation projects and, more generally, the activity of CISP must be carried out within the framework of transparency, honesty, fairness, good faith, and in full accordance with the regulations issued to protect human life in all its expressions.

F. CISP aims at the safeguard and promotion of human rights, and it works to support the building of societies based on the principles of equality, solidarity, repudiation of war.

G. CISP recognizes the crucial importance of civil and political rights, of social, economic, and cultural rights, as well as of third-generation rights (self-determination, peace, development and protection of the environment.)

H. CISP repudiates any kind of discrimination, corruption, forced or child labour, any form of exploitation of children, starting from sexual and commercial exploitation, and it assigns great importance to the acknowledgment and the protection of the dignity, freedom, and equality of human beings. In carrying out its actions, CISP is influenced by the universal right to humanitarian assistance, without constraints related to ideology, religion, race or gender.

I. To this purpose, CISP operates within the reference framework of the Universal Declaration of Human Rights of the United Nations, and it adheres, within the scope of

humanitarian actions aimed at overcoming complex emergencies, to the Code of Conduct issued by the International Committee of the Red Cross.

L. All CISP's employees and collaborators in any capacity, without distinction or exception, must conform their actions and behaviour to the principles and contents of the Code within the scope of their functions and responsibilities, being aware that such compliance is an essential part of the quality of their work performance and of their activity. The relations among employees and collaborators, at any level, must be based on criteria and behaviour expressing honesty, fairness, cooperation, loyalty, and mutual respect.

M. In no way can the conviction to act for the advantage or in the interest of CISP justify or legitimate, even partially, the adoption of behaviour contrary to the principles and contents of the Code.

B.2.2 Proscribed behaviour

B.2.2.1 Bribery and corruption

1. All countries proscribe the corruption of their public officials, and many of them also prohibit the corruption of officials from other countries.

2. CISP's employees and collaborators in any capacity may not offer money or any other benefit in order to obtain unlawful advantages or favourable treatments in their participation in tenders, project or procedures, including those to obtain public funding from EU bodies, foreign States and international organizations.

3. Unverifiable payments are prohibited in all activities put into effect by CISP with governments, international agencies, and in the private sector.

4. CISP forbids: to offer money, gifts, or any kind of compensation that could reasonably be interpreted as exceeding the normal courtesy; to exert illegal pressure, promise any kind of object, service or favors to public officials, directors, officials or employees of the Public Administration or of bodies connected to public service or to their close relatives or partners, whether they are Italian or from other countries.

5. CISP provides for an internal monitoring system in order to ensure that economic operations are registered in a suitable, straightforward, and truthful way.

6. CISP does not proscribe the legitimate refund of expenses incurred by its employees and collaborators directly connected with the carrying out of their tasks and activities, such as travelling and accommodation expenses.

B.2.2.2 Frauds and Misappropriation of Funds

1. Specific regulations of Italian law are aimed at safeguarding the allocation of public funding, grants, and subsidies by the State, other public bodies, and the European Union, so as to avoid that these are unduly obtained by using or submitting forged documents or documents that contain false statements, or by omitting any information due.

2. CISP condemns any fraudulent conduct, by forbidding to produce forged documents stating the existence of essential conditions to participate in a call for tenders

and, more generally, any conduct aimed at altering reality concerning situations whose existence, in falsely represented terms, is essential to obtain benefits, grants, subsidies, or acknowledgments.

3. CISP does not permit to destine the amounts received by public, national, or community bodies under the species of subsidies, grants, contributions, or funding, to goals different from those for which they have been allocated.

B.2.2.3 Offences connected to terrorism and subversion

1. CISP explicitly condemns any act of violence for purposes of subversion or terrorism through its constant commitment to avoid in every possible way that funds handled by CISP or used in the implementation of its projects, as well as the property or materials it has donated to associations and communities, may be somehow used to execute terrorist offences.

2. CISP applies control and verification mechanisms about the activities of the public and private partners with which it cooperates in the implementation of projects, as well as about the destination of funds, trying to avoid any relation with bodies and associations under suspicion of acting in a way contrary to the principles and values adopted by CISP.

3. Each employee or collaborator who has knowledge of acts or behaviour that may indicate any kind of terrorist activity, or that are meant to help or finance such activities or other activities aiming at the subversion of democratic rule, must immediately inform his/her direct report about it.

B.2.2.4 Prevention of offences against the person

1. CISP undertakes the commitment to protect and defend human life first and foremost during the carrying out of its activity.

2. CISP condemns any use on a person of powers corresponding to the right of ownership, and it condemns the acts perpetrated to reduce or maintain people in slavery or servitude, to force a person to work performances or sexual intercourse, begging or any activity implying his/her exploitation.

3. In order to avoid that employees, collaborators, and members of the statutory bodies of CISP incur offences such as reducing or maintaining people in slavery, human trafficking, and buying and selling of slaves, CISP forbids them to use with any person powers such as to reduce or maintain said person in a state of subjugation or to force the same person to work performances or sexual intercourse, begging or any other activity implying his/her exploitation.

4. CISP condemns any form of sexual exploitation of minors, as well as any conduct meant to favour even indirectly child pornography, and it undertakes a strong commitment to do everything in its power to avoid that its employees, collaborators, and members of statutory bodies incur such offences.

5. CISP undertakes the commitment to do everything in its power to avoid that its employees, collaborators, and members of statutory bodies incur the offence of engaging in practices of female genital mutilation aimed at demeaning the image of a woman. CISP has ever been engaged in the fight against such practices.

6. CISP explicitly forbids its personnel to use offices, premises, and equipment, especially sanitary equipment, in the event these should be used within the framework of projects contemplating, even only occasionally, to allow for or facilitate such practices.

B.2.2.5 Receiving stolen goods, laundering, and forgery

1. CISP complies with all regulations proscribing money laundering and requiring the traceability and documentation of any transaction in cash, and it undertakes the commitment to get sufficient information and documentation about possible donors or partners, so as to make sure that these are only engaged in lawful activities and that their funds come from legal sources.
2. CISP opposes any activity having reference to the committing of forgeries. It is then explicitly prohibited to forge and/or to put into circulation (by buying and/or selling) banknotes, coins, credit cards and other securities.

B.3 Provisions concerning administrative activities

1. In carrying out its administrative activities, CISP intends to abide by the highest standards of ethical behaviour and of applicable regulations, even in reference to the guiding principles.
2. CISP pursues its statutory goals in compliance with the laws, its Statute and internal regulations, ensuring the correct operation of its governing bodies, the safeguard of its members' participation rights, and protecting the integrity of the organization's legacy.
3. CISP has an obligation to produce transparent and truthful accounts that correctly and understandably represent its economic, assets, and financial situation. In doing this, it is necessary to comply with the laws and provisions of professional bodies.
4. Each operation and transaction must be correctly registered, authorized, verifiable, legitimate, consistent, and appropriate, in compliance with the laws and regulations in force.
5. An efficient administrative management is essential for the integrity of CISP and for the achievement of its objectives. Three main elements characterize the function of the Administrative Office Manager: a) compliance with the laws, provisions and regulations in force; b) strict internal procedures to secure accurate information for decision-making, and protection of material and financial assets; c) verification and control of the operations carried out by the different internal organizational actors.
6. To this purpose, the following rules of conduct are considered as being essential:
 - To accurately keep the documentation related to all transactions;
 - To periodically examine accounting records and the processes connected to one's work;
 - To protect CISP's property;
 - To accurately record all transactions, so as to facilitate the preparation of annual accounts, in accordance with generally accepted principles of accounting or with any other regulation in force;
 - To accurately prepare financial documentation, based on actual and verifiable data;
 - To keep track and update control processes and procedures for administrative and financial activities;
 - To make sure that all transactions are performed in compliance with a specific authorization of the Director.

B.4 Protection of working conditions

B.4.1 Non-discrimination, equal opportunities, harassment and abuse.

1. CISP offers equal opportunities and it does not apply any kind of discrimination as concerns hiring, selection, retribution, training, work placement, promotions, and termination of the employment relation, or any other activity related to human resources on grounds of race, nationality, religion, opinions, affiliations, gender, age, ethnic group or citizenship, civil or family status, sexual orientation and identity, trade union association and present or previous invalidity.
2. To this purpose, the following rules of conduct are considered as being essential:
 - o To treat all people with respect and in such a way as to safeguard their dignity;
 - o To denounce any discrimination act or harassment to one's report or the Director;
 - o To make sure that decisions concerning people are exempt from prejudices and discriminatory intents, and solely based on facts;
 - o To guarantee that personnel selection is carried out in a transparent way and on the basis of elements of objective comparison.

B.4.2 Health and security

1. CISP is committed to offer a safe workspace, free from risks and dangers. The health and security of employees and collaborators are taken into the utmost consideration and they cannot be jeopardized for any reason whatsoever.
2. To this purpose, the following rules of conduct are considered as being essential:
 - o To put into effect suitable measures to prevent risks, uneasiness or unfavourable working conditions for CISP employees;
 - o To denounce injuries or unsafe conditions;
 - o To master emergency procedures concerning one's own work environment;
 - o To denounce any act or threat of violence towards CISP's employees or collaborators;
 - o To comply with national regulations and with all standards provided for as regards health and security;
 - o To carry out all operations in such a way as to protect people's health or to reduce the risk of injuries and loss of property;
 - o To be prepared for possible emergencies.

B.5 Statement of CISP regarding the code of behaviour of its staff in all the countries of operation

CISP has a zero tolerance policy regarding the abuse and exploitation of children and beneficiaries and is committed to ensuring that its workers, visitors, sub-grantees, suppliers/subcontractors, and implementing partners conduct themselves in a way that is safe for children.

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment. In addition they will be reported to the competent law enforcement instances.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense. As regards the Italian citizens it is recalled that sexual activity with children is punished by the Italian law regardless of the country where the offence is committed.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via the CISP whistle blowing procedures as formalized in the CISP Managerial System.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.
7. CISP workers must *not*:
 - a. punish or discipline child beneficiaries;
 - b. act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
 - c. use language or behavior around or towards children that is inappropriate, harassing, abusive, sexually provocative, or demeaning;
 - d. discriminate against, show differential treatment to, or favor particular children to the exclusion of others;
 - e. hire children for domestic or other labor.

B.6 Data protection and privacy

1. CISP is committed to protect information concerning its employees and collaborators, as well as information concerning third parties acquired during the carrying out of its activities, and to avoid any improper or prohibited use of it.
2. CISP intends to ensure that the treatment of personal data carried out within its premises takes place by respecting the fundamental rights and liberties, as well as the dignity of those concerned, as provided for by the regulations in force.
3. The treatment of personal data must be lawfully and correctly effected. However, only the data needed for well-determined, explicit and lawful goals will be collected and recorded. Such data will be only kept during the time needed for the goals they were collected for. Furthermore, CISP is committed to adopt suitable and preventive security measures for all databanks containing personal data, so as to avoid the risks of their destruction, loss, unauthorized access, or prohibited treatments.
4. Employees and collaborators in charge of data treatment must, among other things and in accordance with regulations concerning the protection of personal data:
 - o Acquire and treat only the data necessary and useful for the goals directly connected with the functions and responsibilities of operators;
 - o Acquire and treat the same data exclusively within the scope of specific procedures, and archive them in such a way as to hinder unauthorized people from accessing them;
 - o Represent and arrange data in such a way as to enable any authorized person to derive from them data an overall picture as much as possible accurate, exhaustive, and truthful.

B.7 Final provisions

1. CISP requires from all its employees and collaborators an in-depth knowledge of the values and principles mentioned in the Code, as well as their earnest adhesion to them.
2. All employees and collaborators, both in Italy and abroad, must be informed about the adoption of the Code and they must commit to follow and comply with the principles of integrity, honesty, correctness, and transparency pursued by CISP in the implementation of its projects.
3. The members of the Governing Council and the Director, on the occasion of the approval of the Code itself, have already voiced their commitment to act in accordance with it and to ensure that employees and collaborators comply with their principles while carrying out their functions.
4. As concerns contractual relations with employees and collaborators, compliance with the provisions contained in the Code is to be considered an essential part of the obligations linked to the employment relation. Every employee and collaborator has thus an obligation to read the Code through and to adopt a conduct suitable to the principles and provisions therein contained.
5. Compliance with the provisions of the Code contributes to single out the duties of members of governing bodies in the execution of their activities.

C. System for verification and safeguard from unlawful acts

C.1 Fundamental principles

1. CISP means to do everything in its power so that its activity is shaped by the compliance with laws, internal regulations, the Code of Behaviour, and influenced by the principles of correctness, transparency, and traceability.
2. The Verification System is aimed at ensuring that the activities of CISP:
 - Are implemented in compliance with laws, internal regulations, and the Code of Behaviour;
 - Pursue well-defined goals in accordance with CISP's statutory goals and are not aimed at obtaining unlawful advantages for private persons or bodies, including CISP itself;
 - Are adequately documented and justified, and thus verifiable.

C.2 Verification scopes

1. CISP periodically evaluates the compliance with the provisions of the Management System within the organization.
2. This periodic internal audit also concerns activities that may imply the risk of offences. More specifically, the verification examines the conduct of the different organizational actors, both in Italy and abroad, with reference to the scopes and operational stages summed up in Table 2.

Table 2 – Verification Scopes

SCOPES	SENSITIVE STAGES
a. Participation in procedures announced by national and international public bodies for the awarding or granting of financial contributions and subsidies.	Formulation, processing and presentation of projects.
b. Negotiation, signing and awarding of contracts/grant agreements with public or qualified bodies, following the participation in public calls for tenders.	Formulation, processing and presentation of projects.
c. Handling of relations with public bodies as concerns security and hygiene at work.	Handling of controls and verification of the fulfilment of the obligations concerning health and safety in the workplace.
d. Cash and liquidity management of the Rome Headquarters and of offices located in	Opening and closing of bank accounts, payments and transfers of funds in foreign currencies.

third countries.	
e. Implementation of the projects in third countries.	Management of cash flow, funds, and cash equivalents belonging to the Organization.
f. Cooperation and support to partners during the implementation of projects.	Selection and choice of partners.
g. Negotiation and signing of grant agreements and partnership agreements for the selection of operators to be employed in the different projects.	Choice of partner, verification of its compliance with the principles of conduct related to the management of human resources.
h. Management of employees and collaborators of the Rome Headquarters.	Signing of contracts.
i. Protection of health and safety of employees and collaborators of the Rome Headquarters.	Compliance with the regulations concerning safety, monitoring and inspections in the workplace.
j. Negotiation, signing and awarding of contracts for the supply of goods both in Italy and in third countries (so as to avoid that the goods supplied are of unlawful origin.)	Actuation of selection, verification and control procedures concerning the supplier and the origin of goods.
k. Collection of funds from non-institutional private donors.	Verification of the origin of funds, registration, drafting of accounting documents.
l. Management of the organization's cash flows, with reference to fund raising and the transfer of funds.	Processing and use of accounting data and evaluation of the same in order to prepare accounts, balance sheets and budgets.

C.3 Verification Procedures

1. Before the end of the first quarter of every solar year the Director draws up a monitoring report concerning compliance with the Management Manual and the Code of Behaviour, with a special but not exclusive attention to the scopes indicated in Table
2. The Director's report is submitted to the Executive Committee and to the Governing Council; this last body may make special decisions based on the contents of the report.

3. The report is drafted following an annual audit carried out through a collection of information related to the operation of the Rome Headquarters and of the offices located in third countries. To this purpose, the Director prearranges a data and information collection diagram, which he then transmits to the organizational stakeholders of the Rome Headquarters and of third country offices.
4. Before the end of the first quarter of every solar year, the President also draws up a specific monitoring report concerning the activities carried out by the Director, so as to ascertain their compliance with the provisions contained in the Management Manual and in the Code of Behaviour. To this purpose, the President bases his/her report on a direct observation of the Director's behaviour and acts, and on a data and information collection diagram he/she has previously prearranged. Then the Administrative Office Manager independently transmits his/her report to the Executive Committee and to the Governing Council.
5. If, as a result of such monitoring activities, it should emerge that the conduct of some CISP operators of any level is unequivocally and intentionally unlawful, they will be removed from their posts.

C.4 Other instruments to prevent and subject to sanctions unlawful acts

CISP fully adheres to the spirit and the letter of the United Nations Convention against Corruption held on December 9, 2003. The Convention includes among the commitments to be undertaken by the signing States the protection from any unjustified treatment towards any person that gives information to the competent authorities concerning possible offences on the basis of well-grounded and reasonable suspicions. CISP, in accordance with the regulations in force both in Italy and in all countries wherein it operates, undertakes the commitment described above within its organization by adopting its own "whistle blowing" system, defined as follows:

C.4.1 CISP's "whistle blowing" system: definition and explanation

CISP considers "whistle blowing" a specific activity carried out by any operator and collaborator or by other persons not contractually bound to the Organization who cooperated and/or cooperate with one or more projects conducted by CISP (as for instance: representatives of other partner agencies, operators of companies performing services or supplying products to CISP, independent consultants.)

The specific activity of "whistle blowing" concerns the signalling of a possible fraud, danger or other serious risk that may affect beneficiaries, partners, the contributors of the country of operation of the donor of the project within which the possible fraud is identified, the donor, the Organization itself, both financially and in terms of reputation.

CISP portends that in all cases when the risks and dangers above indicated are noticed these will be suitably signalled, on the basis of the procedures specified as follows.

By adopting such a system for "whistle blowing", CISP pursues two goals at the same time: first, to provide for every possible measure to prevent unlawful acts, administrative

and otherwise, to protect the interests of the Organization, of its partners and beneficiaries, of the institutions CISP cooperates with, and of donors.

Moreover, CISP means to prevent the risk that its operators and/or parties outside the Organization who cooperate with it do not express their doubts out of fear of reprisals or even dismissal, or out of frustration arising from the lack of an actual follow-up to one's own denounces.

C.4.2 CISP's Procedures for "Whistle Blowing"

1. Every employee and/or internal or external collaborator of CISP, both in Italy and/or in the countries wherein CISP operates, has an obligation to signal cases and information related to the conduct of other operators of the Organization that may be qualified as:
 - o Fraud or attempted fraud;
 - o Non-compliance with legal and/or statutory obligations;
 - o Endangering the health and safety of other persons;
 - o Actuation of practices causing damage to the environment;
 - o Intentional manipulation of acts and information;
 - o Any other conduct contrary to the spirit and the letter of CISP's Code of Behaviour.
2. All cases above indicated may be signalled in any way to the Director by the operators of the Rome Headquarters and by the Country Representative in the event of operators working abroad. If the reported person is the Director, the case must be signalled to the Administrative Office Manager. If the reported persons are Country Representatives, such cases are to be directly reported to the Director. Cases reported to Country Representatives are then reported by them to the Director.
3. Once they have received such warning, the Director and/or the Administrative Office Manager must inform (within 5 working days) all members of the Governing Council, that will hold a meeting to this purpose within the following five working days. The Governing Council makes its decisions concerning the signalled case during a recorded session.

C.4.3 The possible sanctions

If at the termination of the process described above the Governing Council observes the subsistence of an objectively serious fact falling under the types pointed out, it will proceed as follows:

- actuation of internal procedures for the removal of the person/s concerned;
- if the serious fact observed constitutes an offence pursuant to the legislation in force in the country where it has been committed, reporting to the competent authorities.

C.5 Other provisions

1. All personnel working in different capacities for CISP undertakes the commitment to ensure their compliance with the Management Manual, the Code of Behaviour, and with the monitoring procedures provided for.
2. CISP undertakes the commitment to guarantee adequate information and training in order to facilitate a correct application of the provisions contained in the Management Manual and in the Code of behaviour.

D. List of Annnexes

Annex A: Chart of Accounts
Annex B: Financial Planning
Annex C: Model 101
Annex D: Original Entry journal
Annex E: Census of bank accounts
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