

Allegato 1**UPP STAFF CODE OF CONDUCT****Erbil, 24th May 2010**

This Code of Conduct seeks to guard our standards of behavior and in particular to maintain the high standards of independence, effectiveness and impact to which UPP response aspires. It is a voluntary code.

This Code of Conduct takes reflects the Principles of Conduct for The International Red Cross and Red Crescent Movement ICRC and NGOs in Disaster Response Programmes.

1. The Humanitarian imperative comes first

The right to receive humanitarian assistance, and to offer it, is a fundamental humanitarian principle which should be enjoyed by all citizens of all countries. As members of the international community, we recognize our obligation to provide humanitarian assistance wherever it is needed. Hence the need for unimpeded access to affected populations, is of fundamental importance in exercising that responsibility. The prime motivation of our response to disaster is to alleviate human suffering amongst those least able to withstand the stress caused by disaster. When we give humanitarian aid it is not a partisan or political act and should not be viewed as such.

2. Aid is given regardless of the race, creed or nationality of the recipients and without adverse distinction of any kind. Aid priorities are calculated on the basis of need alone

Wherever possible, we will base the provision of relief aid upon a thorough assessment of the needs of the victims and the local capacities already in place to meet those needs. Within the entirety of our programmes, we will reflect considerations of proportionality. Human suffering must be alleviated whenever it is found; life is as precious in one part of a country as another. Thus, our provision of aid will reflect the degree of suffering it seeks to alleviate. In implementing this approach, we recognize the crucial role played by women in disaster-prone communities and will ensure that this role is supported, not diminished, by our aid programmes. The implementation of such a universal, impartial and independent policy, can only be effective if we and our partners have access to the necessary resources to provide for such equitable relief, and have equal access to all disaster victims.

3. Aid will not be used to further a particular political or religious standpoint

Humanitarian aid will be given according to the need of individuals, families and communities. Notwithstanding the right of Non-Governmental Humanitarian Agencies (NGHAs) to espouse particular political or religious opinions, we affirm that assistance will not be dependent on the adherence of the recipients to those opinions. We will not tie the promise, delivery or distribution of assistance to the embracing or acceptance of a particular political or religious creed.

4. We shall endeavour not to act as instruments of government foreign policy

NGHAs are agencies which act independently from governments. We therefore formulate our own policies and implementation strategies and do not seek to implement the policy of any government, except in so far as it coincides with our own independent policy. We will never knowingly - or through negligence - allow ourselves, or our employees, to be used to gather information of a political, military or economically sensitive nature for governments or other bodies that may serve purposes other than those which are strictly humanitarian, nor will we act as instruments of foreign policy of donor governments. We will use the assistance we receive to respond to needs and this assistance should not be driven by the need to dispose of donor commodity surpluses, nor by the political interest of any particular donor. We value and promote the voluntary giving of labour and finances by concerned individuals to support our work and recognize the independence of action promoted by such voluntary motivation. In order to protect our independence we will seek to avoid dependence upon a single funding source.

5. We shall respect culture and custom

We will endeavour to respect the culture, structures and customs of the communities and countries we are working in.

6. We shall attempt to build disaster response on local capacities

All people and communities - even in disaster - possess capacities as well as vulnerabilities. Where possible, we will strengthen these capacities by employing local staff, purchasing local materials and trading with local companies. Where possible, we will work through local NGOs as partners in planning and implementation, and co-operate with local government structures where appropriate. We will place a high priority on the proper co-ordination of our emergency responses. This is best done within the countries concerned by those most directly involved in the relief operations, and should include representatives of the relevant UN bodies.

7. Ways shall be found to involve programme beneficiaries in the management of relief aid

Disaster response assistance should never be imposed upon the beneficiaries. Effective relief and lasting rehabilitation can best be achieved where the intended beneficiaries are involved in the design, management and implementation of the assistance programme. We will strive to achieve full community participation in our relief and rehabilitation programmes.

8. Relief aid must strive to reduce future vulnerabilities to disaster as well as meeting basic needs

All relief actions affect the prospects for long term development, either in a positive or a negative fashion. Recognizing this, we will strive to implement relief programmes which actively reduce the beneficiaries' vulnerability to future disasters and help create sustainable lifestyles. We will pay particular attention to environmental concerns in the design and management of relief programmes. We will also endeavour to minimize the negative impact of humanitarian assistance, seeking to avoid long-term beneficiary dependence upon external aid.

9. We hold ourselves accountable to both those we seek to assist and those from whom we accept resources

We often act as an institutional link in the partnership between those who wish to assist and those who need assistance during disasters. We therefore hold ourselves accountable to both constituencies. All our dealings with donors and beneficiaries shall reflect an attitude of openness and transparency. We recognize the need to report on our activities, both from a financial perspective and the perspective of effectiveness.

We recognize the obligation to ensure appropriate monitoring of aid distributions and to carry out regular assessments of the impact of disaster assistance. We will also seek to report, in an open fashion, upon the impact of our work, and the factors limiting or enhancing that impact. Our programmes will be based upon high standards of professionalism and expertise in order to minimize the wasting of valuable resources.

10. In our information, publicity and advertising activities, we shall recognize disaster victims as dignified humans, not hopeless objects

Respect for the disaster victim as an equal partner in action should never be lost. In our public information we shall portray an objective image of the disaster situation where the capacities and aspirations of disaster victims are highlighted, and not just their vulnerabilities and fears. While we will cooperate with the media in order to enhance public response, we will not allow external or internal demands for publicity to take precedence over the principle of maximizing overall relief assistance. We will avoid competing with other disaster response agencies for media coverage in situations where such coverage may be to the detriment of the service provided to the beneficiaries or to the security of our staff or the beneficiaries.

Allegato 2

UPP FRAUDS POLICY

1. Background

Un ponte per... (UPP) is a NGO founded in 1991. The aim and mission of the association is to prevent new conflicts through informational campaigns, cultural exchanges and international co-operation projects. UPP is working in Iraq since 1991, and currently active in ~~Morocco~~, Tunisia, Jordan, Lebanon, Palestine, and North East Syria. Programs in Iraq range from protection of human rights, of cultural heritage, of freedom of expression and association, to sanitation, education and humanitarian relief.

2. Scope of Policy

This policy applies to any alleged irregularity, or suspicious of irregularity, for acts, omissions or knowledge of by employees, associates, members of the governing bodies, consultants, vendors, suppliers and volunteers and to any other person who can be associated to the organization, that consists in and/or have effect on the financial transactions of the Organization.

Any investigative activity required will promptly deploy without regard to the alleged wrongdoer's length of service, position/title, or relationship to the Organization.

3. Policy

Actions Constituting Frauds:

The terms defalcation, misappropriation, and other fiscal irregularities refer to, but are not limited to:

Any dishonest or fraudulent act

- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of agency activities;
- Disclosing confidential and proprietary information to outside parties;
- Disclosing to other persons securities activities engaged in or contemplated by the agency;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the agency. Exception: Gifts in kind less than \$50 in value;

- Representing the NGO without a proper mandate from the HoM of the program managers;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Any similar or related irregularity

Management is responsible for the detection and prevention of fraud, misappropriations, and other irregularities. Each member of the management team will be familiar with the types of improprieties that might occur within his or her area of responsibility, and be alert for any indication of irregularity.

Any irregularity that is detected or suspected must be reported immediately to **Head of Mission and/or Head of Office** who coordinates investigations in cooperation with the HQ administrative department, when necessary.

Other irregularities

Irregularities concerning an employee's moral, ethical, or behavioral conduct should be resolved by Head of Mission.

If there is any question as to whether an action constitutes fraud, the HoM or Head of Office contacts the Desk Officer for guidance.

Confidentiality

The Head of Mission or his/her deputy (i.e. Head of Office/Legal Representative) treats all information received confidentially.

Any employee who suspects dishonest or fraudulent activity will notify the HOM, and *should not attempt to conduct investigations personally or to interview/interrogate* directly the alleged person about any suspicious of fraudulent act.

Investigation results *will not be disclosed or discussed* with anyone other than those who have a legitimate right to this information. This is important in order to avoid damaging the reputation of people suspected but subsequently found innocent of wrongful conduct as well as to protect the Agency from potential civil liability.

Reporting and investigation procedures

Great care is to display in the investigation of suspected improprieties or irregularities to avoid mistaken accusations or alerting suspected individuals that an investigation is underway.

An employee/collaborator/volunteer/associate who discovers or suspects fraudulent activity will contact the HoM immediately either by request of front meeting or in written modality. The complainant may remain anonymous.

The HoM may inform shortly the alleged person about the undergoing investigation against his/her acts or omissions.

All inquiries concerning the activity under investigation from the suspected individual, his or her attorney, representative or any other inquirer, is to direct to the HoM or his/her deputies. No information concerning the status of the investigation undergoing, will be disclosed.

The reporting individual should be informed of the following:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Do not discuss the case, facts, suspicions, or allegations with anyone unless specifically asked for the disclosure by the HoM

Administration

The UPP HQ appointed personnel (President, General Director, Financial Manager and Area Desks) are responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed bi-annually and revised upon necessity.