



Il Nodo International Cooperation

Code of Conduct

August 2025

1. Introduction and Purpose

This Code of Conduct defines the ethical principles and rules of behavior that inspire Il Nodo International Cooperation in carrying out its activities.

The Code aims to promote a work and collaboration environment based on respect, transparency, and responsibility, guiding employees, volunteers, collaborators, partners, and donors towards behaviors consistent with the organization's values.

2. General Principles

2.1 Applicability

This Code of Conduct applies to all employees, volunteers, collaborators, partners, and donors operating on behalf of Il Nodo International Cooperation.

2.2 Reference Values

With the aim of fostering tangible and lasting change in the contexts where it operates, Il Nodo International Cooperation is committed to upholding, protecting, and promoting the following fundamental values, in accordance with the main international human rights conventions:

- **Human**

Dignity

Recognising and respecting the inherent dignity of every human being is the cornerstone of all the organisation's actions. This principle, enshrined in the Universal Declaration of Human Rights (1948), guides the development of programmes and interventions designed to protect life, wellbeing, and personal freedom without exception.
- **Equality**

and

Non-Discrimination

Il Nodo is dedicated to ensuring equal opportunities for all individuals, rejecting any form of discrimination based on race, gender, religion, language, political opinion, national origin, or any other status. As set out in Article 2 of the Universal Declaration of Human Rights, equality is an inalienable right and an operational criterion in access to services, decision-making processes, and community participation.
- **Children's**

Rights

The protection of children's and adolescents' rights is an absolute priority, inspired by the Convention on the Rights of the Child (1989). Every initiative seeks to guarantee the right to survival, holistic development, and protection from any type of abuse and exploitation.
- **Freedom**

and

Self-Determination

Il Nodo promotes freedom of thought, conscience, religion, and expression, as enshrined in Articles 18–20 of the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights (1966). All individuals are recognised as having the right to make their own life choices and to contribute freely to the development of their communities.

Il Nodo Cooperazione Internazionale ONLUS
via Torelli Viollier 52- 20125 Milano, Italia
M +39 333 1270871 - M +39 331 4777250

Il Nodo International Cooperation Cambodia
N. 28-29J, Street 45BT, Housing of Sambat Meas, Village Tnoat Chhrob,
Sangkat Boeung Tompun, Khan Mean Chey, 12351 Phnom Penh
Kingdom of Cambodia
T +855 (0)12 505 118 - M +855 (0)12 701244
www.ilnodoonlus.org - info@ilnodoonlus.org

Coordinate Bancarie
Banca Intesa San Paolo C/C 2190
intestato a Il Nodo Cooperazione Internazionale
IBAN: IT 07 5030 6909 6061 00000002190
SWIFT/BIC code: BCITITMM

ABA Bank - Advanced Bank of Asia Limited
Bank account 001 635 502 Swift code ABAKHPP
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- Justice and Social Equity**

The organisation supports policies and actions aimed at reducing social and economic inequalities and fostering conditions of substantive justice. In line with the Vienna Declaration (1993) and the United Nations 2030 Agenda for Sustainable Development, all programmes are designed to promote inclusion and the enjoyment of economic, social, and cultural rights.
- Solidarity**

Il Nodo recognises solidarity as a fundamental principle of international cooperation. Every intervention is oriented towards strengthening reciprocal ties, supporting communities, and cultivating a shared sense of collective responsibility.
- Sustainability**

Environmental protection and the promotion of sustainable development are essential commitments to ensure the rights of present and future generations. Il Nodo integrates environmental sustainability as a cross-cutting element of all its programmes, in coherence with the Sustainable Development Goals.
- Protection of the Most Vulnerable**

The organisation places the needs of the most vulnerable individuals at the heart of its work, including women, children, refugees, migrants, persons with disabilities, and marginalised groups. Every action seeks to safeguard their rights, prevent exclusion, and promote empowerment.
- Participation and Inclusion**

Active participation of communities and beneficiaries in decision-making processes is considered essential for the effectiveness and legitimacy of interventions. Il Nodo promotes inclusive practices of consultation, listening, and co-design, recognising the value of everyone's agency and voice.
- Peace and Nonviolence**

Il Nodo is committed to supporting the peaceful resolution of conflicts and the building of relationships founded on nonviolence and dialogue. In line with the Declaration on Education for Peace (1978), all programmes incorporate the promotion of a culture of peace as a tool for social transformation.
- Transparency and Accountability**

Resource management is conducted with the utmost transparency and accountability. Il Nodo strives to ensure clear, accessible, and timely information regarding its activities, the use of funds, and the outcomes achieved, thereby reinforcing trust among partners, beneficiaries, and donors.
- Privacy and Data Protection**

Respect for the confidentiality of personal data and the safeguarding of individual freedoms are ensured in compliance with the General Data Protection Regulation (GDPR) and Article 12

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of the Universal Declaration of Human Rights. All data processing is carried out with the highest standards of care and responsibility.

3. Rules of Conduct

3.1 Towards Project Participants

Respect, Inclusion, and Non-Discrimination

All activities carried out by Il Nodo International Cooperation shall ensure full respect for the dignity, uniqueness, and fundamental rights of every individual. The organisation is committed to creating environments and practices that actively promote inclusion, equality, and non-discrimination.

No form of discrimination, harassment, intimidation or stigmatisation on the basis of race, ethnicity, nationality, gender, gender identity, sexual orientation, age, religion, disability, language, political or other opinion, or any other personal status will be tolerated under any circumstances.

In all interactions with beneficiaries, partners, staff, volunteers and communities, Il Nodo will:

- Treat every person with courtesy, empathy and respect, recognising the inherent worth and equal value of all individuals.
- Ensure that services and opportunities are accessible, fair, and adapted to the specific needs and contexts of diverse groups, with particular attention to those in situations of vulnerability or marginalisation.
- Safeguard personal data and any information shared by individuals with the highest standards of confidentiality and sensitivity, recognising that such data are part of each person's dignity and privacy.
- Uphold the principle of informed consent, ensuring that individuals are clearly informed about how their information will be used and that their choices are respected at every stage.
- Promote participation and meaningful involvement of beneficiaries in the planning, implementation and evaluation of programmes, valuing their perspectives and experiences as essential contributions.

This commitment to respect, inclusion and non-discrimination is integral to all aspects of the organisation's work and represents a non-negotiable standard of professional and ethical conduct.

Confidentiality and Personal Data Protection: Beneficiaries' data must be handled in full compliance with applicable privacy regulations. Beneficiaries' images, considered personal data, require explicit consent before publication or processing. In the case of minors, a parent or legal guardian must sign a release form for the use of sensitive data. (See more in point 4.2 Privacy and Data Protection)

3.2 Towards Donors

- **Transparent and Responsible Use of Donated Resources:** Economic and material resources received must be managed responsibly and with integrity, exclusively for declared purposes.

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- **Clear and Truthful Communication on Fund Use:** Donors must be accurately and transparently informed about the use of resources through clear and verifiable reports.

3.3 Towards Employees and Volunteers

- **Safe and Respectful Work Environment:** Il Nodo International Cooperation promotes a work environment based on mutual respect, safety, and well-being.
- **Professional Growth and Well-being:** Policies that foster skill development and workplace well-being are encouraged.
- **Conflict of Interest Prevention:** Employees and volunteers must avoid situations that could create conflicts between personal and professional interests.

3.4 Towards Partners and Suppliers

- **Transparent and Fair Selection:** Partners and suppliers must be chosen based on transparency, fairness, and shared ethical values.

3.5 Towards the Organization

- **Protection of Image and Reputation:** Every member of the organization has a duty to uphold Il Nodo Onlus's integrity and reputation.
- **Workplace Safety and Hygiene:** The use of drugs, alcohol, or the dissemination of inappropriate materials is prohibited.
- **Confidentiality Obligation:** All members must maintain confidentiality regarding sensitive organizational information.

3.6 Relations with Institutions

Il Nodo Onlus commits to maintaining collaborative, respectful, and transparent relationships with public and private institutions.

3.7 Relations with the Press and Media

Any external communication must respect principles of accuracy, truthfulness, and consistency with the organization's values, and must be agreed upon with the Head Office.

4. Control and Enforcement Mechanisms

4.1 Supervision

The body responsible for overseeing compliance with the Code of Conduct will monitor, prevent, and address any violations in compliance with the national law of the Country in which the Code of Conduct is signed.

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4.2 Privacy and Data Protection

Respect for the confidentiality of personal data and the safeguarding of individual freedoms are fundamental principles upheld by Il Nodo International Cooperation, in compliance with the General Data Protection Regulation (GDPR) and Article 12 of the Universal Declaration of Human Rights.

All personal data entrusted to the organisation are processed lawfully, fairly and transparently, and solely for specified and legitimate purposes related to the organisation's activities. Data processing is limited to what is strictly necessary to achieve those purposes and is carried out with the highest standards of care, accuracy and integrity.

Il Nodo International Cooperation is committed to:

- Collecting personal data only when it is relevant, adequate, and limited to what is necessary in relation to the intended purpose.
- Informing individuals clearly and comprehensively about the purposes and legal basis of processing, as well as their rights in relation to their data.
- Ensuring that personal data are kept secure, protected against unauthorised access, accidental loss, destruction or damage, through appropriate technical and organisational measures.
- Respecting the rights of data subjects, including the right to access, rectify, erase, restrict or object to processing, and the right to data portability.
- Retaining personal data only for as long as is necessary to fulfil the purposes for which it was collected, and in compliance with applicable legal and contractual obligations.
- Providing specific safeguards and heightened protection in the case of sensitive personal data and data concerning vulnerable individuals, including children, survivors of violence, and persons in humanitarian situations.
- Appointing a designated point of contact for all matters related to data protection and ensuring that all staff and partners handling personal data are appropriately trained and aware of their responsibilities.

Through these commitments, Il Nodo seeks to uphold the dignity, privacy, and autonomy of every individual, fostering a culture of trust and respect in all relationships and interactions

4.3 Reporting Violations

Il Nodo is committed to transparency, accountability, and continuous improvement in all its activities. We recognise the right of all project participants to raise concerns, lodge complaints, or provide feedback about our conduct, decisions, or activities.

This mechanism ensures that any concerns are handled promptly, fairly, and with respect for the dignity and confidentiality of all parties involved.

- **Secure Reporting Methods:** Il Nodo provides dedicated and secure channels for reporting any unethical behavior, guaranteeing strict confidentiality and full protection of the whistleblower's

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identity. Every information is managed with the highest standards of privacy, integrity, and discretion.

- **Dedicated Platforms:** Violations may be reported by completing a dedicated Google Form, available online and submitted to the email address 'complaints.ilnodoonlus@gmail.com', managed by the Complaint Office. To ensure accessibility and uphold everyone's right to be heard, the Form is available in three languages: Khmer, English, and Italian. To further support project participants and staff members in the Cambodian office, an additional reporting channel is available via a dedicated Telegram chat, overseen by the Safeguarding Policy Officer, ensuring accessibility and comfort for all.

4.4 Sanctions

Consequences for violations of the Code will be determined based on the severity of the action, including disciplinary or legal sanctions where applicable.

5. Updates, Communication, and Appendices

5.1 Periodic Updates

The Code of Conduct will be periodically reviewed to ensure consistency with regulatory and organizational changes.

5.2 Dissemination

The Code will be communicated to all employees, volunteers, partners, and suppliers through official channels and dedicated training sessions.

5.3 Reference Regulations

- **Legislative Decree 231/2001:** Administrative liability of entities.
- **Legislative Decree 196/2003 and subsequent amendments** introduced by Legislative Decree 101/2018 on personal data protection.
- **EU Regulation 2016/697 (GDPR), Article 9.**
- **Cambodian Law on Commercial Enterprises (2010):** Administrative liability of entities
- **Cambodian Law on the Protection of Personal Data and the Protection of Privacy (2015):** Personal data protection.

6. Commitment Declaration

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I, the undersigned _____ declare that I accept and will abide by the principles and rules contained in this document, actively contributing to their application.

Date and place: _____

Signature: _____

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