

AMI FOUNDATION

CODE OF CONDUCT

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PREAMBLE

I Letter of Principles

This institution brings together health, social and environmental professionals as well as many others from diverse fields who accept, upon the act of adhesion and under a commitment of honor, to respect the following principles:

1.

To assist all victims of natural disasters, collective accidents and scenarios of war, and to help all the socially excluded without discrimination of race, politics, religion, social philosophy or position, as well as to promote and protect the environment.

2.

To work in the strictest neutrality and in complete independence, abstaining from interfering with the internal affairs of the States, Governments and Parties in whose territory they are called to intervene. AMI — International Medical Assistance Foundation — claims for its own activity, in the name of its universal vocation, full and complete freedom to exercise medical, social and environmental functions.

3.

To not accept nor tolerate deference or influence of any political, ideological, religious or other power or force.

4.

To observe professional confidentiality and to refrain from issuing any judgment or publicly expressing an opinion, favorable or hostile, regarding the events, forces or leaders who led to the local conjuncture.

5.

Anonymous or benefactors should not expect any personal or collective benefit from the exercise of their activity. Assessing the risks and dangers of the missions they perform, they should not claim for themselves or for any third parties that represent them any compensation beyond what the Institution is able to offer.

II

Principles of humanitarian action

1. Humanity

To relieve human suffering wherever it may be found. To protect life and health and ensure respect for human beings.

2. Neutrality

To not take sides in conflict situations or participate in controversies of a political, racial, religious or ideological nature.

3. Impartiality

To act only according to needs, prioritizing the most urgent situations without distinction of nationalities, races, genders, religions, beliefs, social classes or political opinions.

4. Independence

To not have any type of political, economic, military or any other interest in the areas of operation.

III

Vision and Mission

1. Vision

To attenuate inequality and suffering all over the World with the Human Being as the main focus. To create a more sustainable, more harmonious, more inclusive, more tolerant, less indifferent and less violent world.

2. Mission

To deliver humanitarian aid and promote human development, taking into account Human Rights and the Millennium Development Goals in the areas of social and environmental health, anywhere in the world, regardless of race, gender, age, nationality, language, politics, religion,

social position or philosophy, regarding each person as a unique, irreplaceable being, worthy of attention and care.

IV Values

Guided by the principles outlined above, the Foundation seeks to achieve its mission according to the following values:

1. Fraternity

Believing that all Human Beings are born free and equal in dignity and rights. They are endowed with reason and conscience and must act towards each other in a brotherly spirit.

2. Solidarity

To undertake the worries and needs of the human being as its cause of action.

3. Tolerance

To pursue a personal and communitarian attitude of acceptance towards different values from those of the group of origin.

4. Equity

To guarantee equal treatment regardless of parentage, age, sex, race, language, place of origin, religion, political or ideological beliefs, literacy, economical situation or social condition.

5. Truth

To always seek correspondence between what is done and what is proclaimed and vice versa.

6. Directness

To dialogue and to speak clearly, respecting the values of the fellow man, making your own respected at the same time.

7. Transparency

Guaranteeing that the action and decision processes are carried out in such a way that they're fully understood by making all the relevant information available.

Chapter One

Scope

Article 1

Personal scope

1. This Code of Conduct, hereinafter referred to as "Code", shall apply to all employees of the Foundation in the performance of their professional duties at any time by the Board of Directors, within the limits of their respective contracts and applicable legislation.
2. Collaborator means all salaried workers as well as volunteers.
3. The Code also obliges, in the applicable part, the members of the Board of Directors and of the Executive Council, without prejudice to the special duties of conduct to which they are subject in view of the increased responsibilities that are assigned to them and which are set out in its own document.
4. The Code shall apply only to volunteers of the Foundation insofar as it is not incompatible with the special nature of volunteer work and with special precepts and uses.

Article 2

Material scope

1. Taking into account the specific nature of the activities and the statutory purposes of the Foundation, this Code integrates the set of rules and general principles of ethics and professional conduct that apply to all Foundation employees in relationships with each other and with third parties, constituting a reference to the standard of conduct required of the Foundation in its relations with the public.
2. The rules and principles set out in this Code shall be reflected in the Welcoming Manual as regards the relationship between the Foundation and its staff.

Article 3

Territorial scope

1. This Code shall apply to employees of the Foundation with a regular place of work or service in Portugal, including when they travel abroad in the exercise of the professional duties assigned to them.
2. The rules of this Code shall also apply to employees of the Foundation with a regular place of work or service abroad, subject to mandatory provisions deriving from local law.

Chapter Two

Principles of ethics and professional conduct

Article 4

General principles

1. Employees should be guided by their loyalty towards the Foundation, as well as being appropriate, independent and free from personal interests, avoiding situations that may give rise to conflicts of interest.
2. Employees must also behave in a way that maintains and enhances the public's trust in the Foundation, contributing to its effective functioning and to the affirmation of an institutional position of rigor and quality.

Article 5

Legality

In the exercise of their professional duties, employees must act in accordance with the law, in particular to ensure that decisions of the Foundation that affect rights of natural or legal persons have a legal basis and that its content is in conformity with the law.

Article 6

Non-discrimination

1. In dealing with requests from third parties, in the investigation of proceedings and in decision-making, employees shall ensure compliance with the principle of equal treatment.
2. In the event of any difference in treatment, employees and volunteers shall ensure that it is justified by the objective and relevant data of the subject matter or by the guidelines adopted by the Foundation's Board of Directors.

3. Employees may not engage in any unjustified discrimination based on sex, race, color, ethnic or social origin, genetic characteristics, religion or belief, political opinion or any other opinion, birth, disability, age or sexual orientation.

Article 7

Proportionality

Employees must contribute to decisions in proportion to their intended purpose, in particular by avoiding restrictions on the rights of third parties or the imposition of charges where there is no reasonable proportion between such charges or restrictions and the purpose pursued.

Article 8

Abuse of power

1. The professional duties of employees are exercised solely for the purposes assigned to them by resolution of the Board of Directors of the Foundation.
2. Employees shall refrain from using those professional functions in their own benefit for purposes which are not legally based or which are not motivated by the interest of the Foundation.

Article 9

Impartiality and independence

1. Employees must be impartial and independent, refraining from any action that arbitrarily harms the public, as well as any preferential treatment, for whatever reason.
2. Employees shall not guide their conduct by personal, family or political, social or economic interests, nor shall they participate in a decision or in a proceeding in which they have, or one of the members of their family has, directly or indirectly, interests of any kind.
3. Independence and impartiality are inconsistent with the fact that an employee or one of the members of his/her family requests, receives or accepts from outside the Foundation, from a subordinate or hierarchical superior, any benefits, rewards, remunerations or offers that exceed a merely symbolic value, and which are in some way related to the activity that the employees perform in the Foundation.
4. Employees shall not request or receive remuneration of financial or any other nature for the exercise of any external activity in the performance of their duties, except when strictly necessary to support their expenses, unless authorized by the Board of Directors.

Article 10

Diligence and efficiency

Employees must be zealous, efficient and perform the professional duties assigned to them and the duties imposed on them by the Foundation in the best possible way, as well as be consistent in their behavior with the decisions of the Foundation's Board of Directors.

Article 11

Confidentiality

Employees may not assign, disclose, use or refer, directly or through an intermediary, any information relating to the Foundation's activity or to the exercise of their professional duties, when these are considered confidential according to their nature and content by the Board of Directors.

Article 12

Efficiency and rectitude

1. In the relationship with the public and users, employees should demonstrate availability, efficiency, correctness and courtesy, trying to ensure that, as far as possible, the public or users obtain the information they request.
2. When replying to letters, telephone calls and e-mails, employees must respond in the most rigorous, timely and complete manner possible to the questions put to them and, if they are not responsible for the subject matter, direct the public or user to the appropriate employee.
3. If an error occurs that unjustifiably undermines the rights of third parties, employees should immediately notify their superiors immediately and seek to expeditiously correct the negative consequences of their error.

Article 13

Protection of the environment

1. Following the Foundation's environmental policy, employees should adopt best practices in protecting the environment, in particular by promoting eco-efficient management in order to minimize the environmental impact of their activities and the responsible use of the Foundation's resources.
2. Whenever possible, all employees of the Foundation shall promote the recycling of the materials consumed by using the "Ecopontos" made available on the premises of the Foundation.

Chapter Three

Conflicts of interest and incompatibilities

Article 14

Conflicts of interest

1. Employees must avoid any situation that may lead directly or indirectly to conflicts of interest.
2. There is a current or potential conflict of interest whenever employees have a personal or private interest in a particular subject that may influence, or appear to influence, the impartial and objective performance of their professional duties.
3. Personal or private interest means any potential advantage for oneself, for their relatives and friends, for their circle of friends, for another collaborator of the Foundation, for a company in which they have interests or an institution to which they belong.
4. Any conflicts of interest of any employee subject to the provisions of this Code shall be immediately communicated to the Directors of the respective department in the case of employees, or to the Board of Directors in the case of its own members or in the case of members of the Executive, Fiscal or Directive Board.

Article 15

Supplier Relationships

1. Employees with responsibilities in selecting the supply of goods or services to the Foundation may not have any personal interest in the supplier or supply.
2. Personal interest means any financial or economic interest that may affect the employee's ability to carry out the professional duties assigned to him or affect his ability to be impartial and independent.

Article 16

External activities

1. Employees may engage in any activities outside their working hours, whether paid or unpaid, provided that such activities do not adversely interfere with their obligations to the Foundation or may not create a conflict of interest.
2. The exercise of paid or unpaid external activities other than scientific or academic activities shall always be considered to be incompatible with the activity of the Foundation when the

natural or legal person in question is a beneficiary of the Foundation's grant or supplier, within the context of the aforementioned activities or in institutions within the same branch of activity or ethically incompatible with the principles and values of the Foundation.

Article 17

Media

1. In matters relating to the activity and public image of the Foundation, employees shall not grant interviews or provide information deemed confidential or not available to the general public, on their own initiative or at the request of the media without, in any case, having obtained prior authorization from the Board of Directors.
2. Employees shall communicate to their superiors who, in turn, shall inform the Communication Department of the Foundation whenever they wish to write articles for newspapers or magazines or provide radio or television interviews related to their professional duties.

Article 18

Relationship with other institutions

1. Formal or informal contacts with representatives of other national or foreign public or private institutions should always reflect the guidelines and positions of the Foundation's Board of Directors, if already defined. Employees should guide their relationships by high standards of quality, integrity, courtesy and transparency.
2. In the absence of a definite orientation or position of confidentiality, employees must explicitly preserve the Foundation's image on a particular subject when they speak in a personal capacity.

Article 19

Limitation on renewal of governing bodies

1. The exercise of functions in the Board of Directors, as well as the exercise of management functions shall be exercised with rigor, zeal and transparency in the management, observing the highest standards of good governance of the organizations.
2. According to the will of its Founder, expressly contemplated in the Statutes, there is no limit to the renewal of the terms of office of the members of the corporate bodies.

Chapter Four

Preventing and Combating Harassment at Work

Article 20

Concepts

1. The practice of sexual harassment and exploitation is strictly prohibited.
2. "Harassment" means unwanted behavior, namely one of discriminating nature, practiced when accessing the workplace or in it, with the aim or effect of disturbing the person or his/her dignity, or of creating an intimidating, hostile, degrading, humiliating or destabilizing environment.
3. "Sexual harassment" constitutes unwanted sexual behavior, in a verbal, nonverbal or physical form, with the purpose or effect referred to in the preceding paragraph.
4. "Harassment" is characterized by intentionality and repetition.
5. Sexual exploitation is understood as any abuse of another person's vulnerability, through abuse of power or trust, for sexual purposes, including, but not limited to, obtaining financial benefits.

Article 21

Application

The Fundação de Assistência Médica Internacional will not tolerate any form of work-related sexual harassment and exploitation, including workers, volunteers, clients, suppliers and beneficiaries, regardless of the means used, even if it occurs outside the workplace.

Article 22

Procedure

1. An employee who considers that he or she is being harassed in the workplace, or by people with whom he/she has a professional relationship, must report the situation to the Human Resources Department of the Fundação de Assistência Médica Internacional, which will treat it in a confidential, impartial, efficient and prompt manner, safeguarding the principle of innocence.

2. The national volunteer who considers to be the target of sexual harassment or exploitation during his volunteering, must report the situation to the Human Resources Department of the Fundação de Assistência Médica Internacional, which will treat it in a confidential, impartial, efficient and prompt manner, safeguarding the principle of innocence.
3. The international volunteer who considers to be the target of sexual harassment or exploitation during his volunteering, must report the situation to the Human Resources Department of the Fundação de Assistência Médica Internacional, which will treat it in a confidential, impartial, efficient and prompt manner, safeguarding the principle of innocence.
4. The complainant and the witnesses indicated by him cannot be sanctioned disciplinarily, unless they act with intent, based on declarations or facts contained in the proceedings, judicial or administrative, triggered by sexual harassment or exploitation until a final and unappealable decision, without prejudice of the exercise of the right to be heard by the person to whom the harassment is imputed.

Article 23

Measures of combat and prevention

1. The Board of Directors of the Fundação de Assistência Médica Internacional is responsible for implementing concrete actions to identify the potential and risk factors for sexual harassment and exploitation in the workplace.
2. The forms that the Fundação de Assistência Médica Internacional can adopt to identify the potential for sexual harassment and exploitation in the workplace include, but are not limited to:
 - a) Regular consultation of employees, guaranteeing the anonymity of the answers, evaluating or identifying factors that increase the risk of sexual harassment and exploitation.
 - b) Regular consultation of employees, guaranteeing the anonymity of the answers, ascertaining the occurrence of potential cases of sexual harassment and exploitation.
 - c) Regular consultation with those responsible and direct hierarchies.

d) All employees may, through the medium of communication that they consider as the most suitable, identifying themselves or anonymously, report occurrences, suspicions or potential harassment cases, to the Legal Department or directly to the Board of Directors of the Fundação de Assistência Médica Internacional.

e) Institution of the practice of job interviews exit to the workers in process of voluntary exit.

3. The Fundação de Assistência Médica Internacional must institute disciplinary proceedings whenever it becomes aware of alleged sexual harassment and exploitation at work.

Chapter Five

Correspondence, requests and processes

Article 24

Response

1. Any correspondence addressed to the Foundation shall be answered or acknowledged within 30 days.
2. The reply should indicate the reference of the correspondence adopted by each Department of the Foundation.
3. There is no need to acknowledge or respond in the case of letters or complaints of abusive nature because of their excessive number or irrelevant, repetitive or unreasonable nature.
4. If the condition of "private correspondence" is expressed in the envelope, its inviolability is guaranteed.
5. E-mail is not considered private correspondence when provided by the Foundation for strict professional purposes, and therefore it is considered a working tool, assuming that its use serves institutional purposes only and not the private use of the collaborator.

Article 25

Requests and processes

1. Employees shall ensure that a decision on requests made to the Foundation is taken within a reasonable period of time.

2. If a request addressed to the Foundation cannot, by virtue of its complexity or the issues it raises, be the subject of a decision within a reasonable period, the staff shall inform the author thereof.

Article 26

Grounds for decisions

1. All decisions on behalf of the Foundation shall be justified by a clear indication of the relevant facts and the basis of the decision, and standard responses may be used where the number of persons to whom similar decisions relate is high.
2. Employees should avoid making decisions that are based on summary, vague or personal grounds.

Chapter Six

Documents and data processing and protection

Article 27

Data protection

1. Employees working with, or having access to, personal data relating to individual citizens, shall respect the privacy and integrity of the person in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.
2. Employees are obliged to guarantee the confidentiality of the data as an inseparable part of their duties under the employment contract. They should also proceed in accordance with all the information and training received and comply with all the guidelines defined in the data protection policy.
3. Failure to comply with obligations may have disciplinary consequences, and all failures under the data protection policy should be reported to the Data Protection Officer.

Article 28

Data Protection Officer

1. Data protection is a central function and a Data Protection Officer will be appointed, who must report to the Board of Directors at least twice a year on the development of activities carried out under the data protection policy.
2. The Data Protection Officer is responsible for ensuring compliance with data protection regulations, by providing information to all the Foundation's employees in this area.
3. The Data Protection Officer will also be responsible for identifying risks and proposing improvement opportunities related to the data protection policy.
4. Through the approval of the Executive Council, the Data Protection Officer may, within the scope of his duties, determine the implementation of data protection measures in any geographical area where the Foundation acts and processes the data, and for this purpose should have appropriate controls and accesses.
5. The Data Protection Officer may be assisted in the performance of his duties by a support group, which should be composed exclusively of members with knowledge of national and European data protection legislation and practices, including an understanding knowledge of the processing operations carried out, knowledge of information technologies and data security, knowledge of the business sector and organization and the ability to promote a data protection culture within the Foundation.
6. The abovementioned support group may be submitted, on a proposal from the Data Protection Officer to the Foundation's Board of Directors. However, it is the Board of Directors of the Foundation that will be responsible for nominating the support group.

Article 29

Data processing of employees

1. Employees' personal data will be processed in accordance with the data protection policy, taking into account the rights and operational requirements of the Foundation.
2. The personal data of the employees are treated exclusively within the scope of the employment contracts. The Foundation may transfer this data to internal units of the institution: Departments, Porta Amiga Centers, Delegations or international partners, previously heard by the Data Protection Officer and with the knowledge of the collaborator.
3. Access to this information should be regulated in employment contracts.

Article 30

Requests for public access to documents

1. Employees shall deal with requests for access to Foundation documents in accordance with guidelines defined by the Board of Directors.

2. If employees are unable to comply with a verbal request for access to documents, the applicant shall be advised to make the request in writing.

Article 31

Disclosure of documents of the Foundation

In compliance with the principle of transparency, all acts related to the Foundation, namely acts of institution, statutes, act of concession of the Statute of Public Utility, identification of the founders, updated composition of the governing bodies as well as the respective date and term of the mandates, identification of the number and nature of the employees' bond, as well as their management, account and activity reports, should be included on the Foundation's website, for consultation by interested parties.

Article 32

Keeping proper records

The Foundation's services must keep adequate records of the correspondence in and out, the documents received and the steps taken, in accordance with the archive policy approved by the Board of Directors and in accordance with applicable law.

Chapter Seven

Internal relations

Article 33

Relationships between collaborators

1. In their relations with each other, employees must respect the principle of loyalty, which implies not only the performance of the professional duties assigned to them by the Board of Directors, compliance with the instructions of the Directors and respect for appropriate hierarchical channels, but also transparency and openness in personal dealings with superiors, colleagues and subordinates.

2. Employers should keep other colleagues that are working on the same subject informed of the work in progress and allow them to make their contribution.

3. It is contrary to the kind of loyalty that is expected of the Foundation's employees not to disclose to superiors and colleagues indispensable information for the course of business, especially for the purpose of obtaining personal advantages, the provision of false, inaccurate or exaggerated information, the refusal to collaborate with colleagues and the demonstration of an obstructive attitude.

4. Employees who perform management, coordination or leadership duties should instruct their subordinates in a clear and comprehensible manner, either verbally or in writing.

Article 34

Use of Foundation resources

1. Employees shall respect and protect the Foundation's assets and shall not allow misuse by third parties of the services and / or facilities.

2. All Foundation equipment and facilities, regardless of their nature, may only be used for institutional use, unless the use has been expressly authorized by the Board of Directors.

3. Employees must also take all appropriate and justified measures to limit the Foundation's costs and expenses in order to allow the most efficient use of available resources.

Chapter Eight

Code application and disclosure

Article 35

Code disclosure

1. The Foundation shall take effective measures to inform the public about this Code, in particular by making it fully or partially available on its website (*www.ami.org.pt*).

2. The Code shall be distributed to all Foundation staff and shall be divulged and made available in electronic form.

3. In order to comply with the provisions of this Code, the employees of the Foundation shall request from the Directors the guidelines they deem necessary, as well as the clarification of any doubts about the subject matter of this Code.

4. The process of admission of Employees must include the declaration of knowledge and acceptance of the rules in force in this Code of Conduct.

5. Violation of the provisions of this Code of Conduct may lead to the opening of disciplinary proceedings.

Article 36

Implementation

This Code of Conduct, as well as its subsequent updates, shall enter into force on the day immediately following its approval by the Board of Directors of the Fundação de Assistência Médica Internacional.

Latest amendments approved at the Board of Directors meeting of January 13, 2021.