CODE OF ETHICS OF

WORKSHOP FOR CIVIC INITIATIVES FOUNDATION

This Code of Ethics includes:

A. Basic Principles B. Areas covered

B. Application of the Code

A. Basic principles:

1. Honesty and integrity

WCIF conducts its activities in accordance with the legislation of the Republic of Bulgaria, the legislation of the countries from which it receives funding, and the internal rules and regulations of the Foundation and following the highest ethical principles of work.

2. Integrity

In its work, WCIF avoids any kind of discrimination based on racial or ethnic origin, nationality, political beliefs, religion, gender, sexual orientation, age, etc.

WCIF makes funding decisions based on opinions made by evaluators external to the organization who declare their unbiased position.

3. Professionalism

The members of the WCIF team are required to conduct themselves in an ethical and professional manner. The WCIF shall ensure the necessary level of professionalism for the quality performance of the tasks assigned to its staff.

WCIF is committed to the professional development of team members.

4. Non-discrimination

WCIF provides a workplace that is free of harassment and unlawful discrimination. The members of the WCIF team shall not engage in discrimination based on any ground including class, age, race, colour, ethnicity, indigenous status, national origin, gender, gender identity or expression, sexual orientation, disability, pregnancy, medical condition, religion, social origin or status, political affiliation, trade or union membership, or marital or veteran status in hiring or employment practices, such as promotions, rewards, and access to training.

5. Sexual harassment

WCIF is committed to providing a safe environment for all its employees and its grantees free from harassment at work, including sexual harassment. WCIF will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously, and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and confidence. No one will be victimized for making such a complaint.

6. Confidentiality

The members of the WCIF team respect the confidentiality of the information to which they have access. Team members shall not divulge, disclose, provide to another, or disseminate information that

has come to their knowledge in connection with the performance of their professional duties. They may not use the information for purposes unrelated to the performance of their professional duties.

7. Conflicts of interest

In carrying out any activity, team members must avoid situations giving rise to a real or even potential conflict of interest.

WCIF does not collaborate and/or partner with relatives, close and important service providers or former directors, and members of the Board of Trustees.

Examples of conflicts of interest include not only those instances listed in the law. WCIF carefully monitors and avoids the following conflicts of interest concerning political parties and religious organizations, donors, recipients of WCIF funding, and service providers. Concerning family, WCIF has adopted a policy that relatives of WCIF team members may not hold paid positions or leadership positions with WCIF. In addition, WCIF does not engage in business relationships, collaborations, and/or partnerships with relatives and friends of team members and the Board of Trustees.

WCIF strives to ensure objectivity in its decision-making process, particularly related to the provision of funding or procurement. With this in mind, we have adopted a gift acceptance policy as follows:

- No member of the staff or Board of Trustees of the WCIF may accept gifts, including the provision of services or items.
- Members of the team and Board of Trustees may not receive money in any amount from organizations that are in partnership with the Foundation or are seeking or in the process of applying for financial support.

8. Transparency and accountability

All information disseminated by WCIF must be complete, accurate, and comprehensive. In this way, we enable the recipients of this information to make decisions in full knowledge of all the information, and so to be able to determine their relationship with the Foundation.

9. Working environment

WCIF is committed to ensuring that working conditions are healthy and safe. WCIF respects the personal dignity of team members.

B. Areas Affected

1. Donor Relations

The Foundation's donors are its assets.

1. Contractual relations with donors

The principles of transparency, integrity, honesty, professionalism, and the highest possible degree of cooperation underpin all relationships and contractual relations with the donors of the WCIF.

2. Donor satisfaction

WCIF attaches paramount importance to maintaining high-quality standards in the services it provides to its donors. We attach equal importance to maximizing the impact of the donation received. We continually seek the views of our donors.

2. Relations with grantees

1. Contractual relations with grantees

The principles of transparency, integrity, honesty, and professionalism are the basis of all contractual relationships with the grantees of the IGRF.

Grant recipients may not have any other relationship with WCIF than that established in the contract for the targeted funding.

All of WCIF's grantee organizations will commit to abiding by the same ethical rules. Evidence of non-compliance will result in the termination of financial support and collaboration with the particular organization.

No member of the staff or the Board of Trustees of WCIF may accept gifts from grantees.

3. Relations with staff

People are key to the WCIF. Only with the help of human resources can maximum donor satisfaction, optimization of donated resources, good coordination, transparency, and grantee accountability be achieved.

In this regard, WCIF continuously increases the level of professional qualification of its team members. WCIF takes into account the individual characteristics of its staff and creates conditions for fruitful activity and a good working environment.

1. Human Resources Management

Team members are employed on a contract basis. WCIF avoids any discrimination in employee selection or career development.

Professional qualities are evaluated solely based on the interests of the WCIF.

In terms of professionalism, WCIF must pay special attention to the development of its employees, providing them with the opportunity to participate in various courses, seminars, meetings, etc.

Employees should be diligent and loyal in the performance of their duties. They are expected to safeguard the assets of the WCIF through a professional attitude consistent with operational procedures.

Staff members may have personal political, religious, or human rights involvement only in a personal capacity and without implicating the Foundation's name.

WCIF staff members may not run for elective political office while employed by WCIF.

2. Security and Health

WCIF ensures that working conditions comply with existing regulations in the country.

4. Relations with contractual partners

Collaboration with contractual partners enables the WCIF to carry out its activities. WCIF appreciates the importance of their contributions and is committed to engaging with them based on the principles of mutual respect and impartiality. The WCIF respects their expectations to provide clear instructions on the work to be carried out and for the WCIF to pay amounts due within agreed timeframes.

WCIF does not collaborate and/or partner with relatives, family members of team members, or major donors or former directors and members of the Board of Trustees.

1. Selection Criteria

WCIF does not conduct business relationships, collaborations and/or partnerships with relatives and

close family of team members and the Board of Trustees.

Outside of this rule, the selection of contractual partners shall be based on clear, unambiguous and non-discriminatory procedures. The criteria based on which selection is made are competitiveness and quality of the products or services offered.

V. Relations with public institutions

Public Administration

All relations between the WCIF and representatives of central and local government are based on the principles of fairness, transparency, cooperation and non-interference and full respect for the role of each authority.

2. Political parties, religious organizations, trade unions, and associations

The CIFF does not provide funding to or work in partnership with political parties. The FRGF does not provide funding to, or work in partnership with, religious organizations.

VI. Media relations and external communication

WCIF appreciates the key role of the media in raising awareness of the public, in particular donors and grantees. WCIF is committed to seeking out and working in collaboration with all media, making no distinction between them, in order to meet the need for information quickly and completely.

1. Internal organisation

All members of the team must be responsible, within the limits of their competence, for explaining their actions to the general public. Internal communication plays an important role in ensuring coordination between team members. It ensures that the official position of the WCIF on various issues will be clear, accurate and consistent.

2. External communication

The external communication of WCIF must be consistent with the moral values of civil society. It must be truthful and free from rude and offensive messages.

WCIF must take care to produce publications and maintain its websites so that they are effective and meet the expectations of donors, grantees, partners and all stakeholders.

C. Implementation of the Code

1. Adoption and dissemination

The Code of Ethics has been adopted by the Board of Trustees of the IGRF. Any future amendments shall also be approved by the Board of Trustees.

The Code is published on the WCIF website.

Each team member and newly recruited employee receives a copy of the Code of Ethics.

WCIF team members are required to notify WCIF of any existing or potential conflict of interest situation as soon as it becomes known to them.

Grantees and WCIF's principal service providers must also notify WCIF of any potential conflict of interest.

To ensure compliance with these conditions, WCIF staff are required to declare in writing annually the absence of conflicts of interest.

Grant recipients are also required to sign a declaration of no conflict of interest when signing the grant agreement, as are providers of services to WCIF when signing a service agreement.

2. Whistleblowing

If members of the WCIF team, grantees, core service providers, or funders have ethical concerns related to possible violations of the WCIF Ethical Principles, laws, or regulations, and in the event of possible reporting and control irregularities, fraud or other violations, they should immediately inform the WCIF Executive Director.

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. WCIF recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and her/his employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, she/he can approach either the Executive Director or the designated staff member responsible for receiving complaints of sexual harassment. This person is WCIF's expert on gender-based violence.

When the designated person receives a complaint of sexual harassment, she/he will:

- immediately record the dates, times, and facts of the incident(s)
- ascertain the views of the victim as to what outcome she/he wants
- > ensure that the victim understands the organization's procedures for dealing with the complaint
- discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if she/he is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the organization through the relevant legal mechanisms.