

# Code of Ethics and Conduct

Version 1.0

Approved by the Board of Directors on June 16, 2026

Effective as of June 16, 2026

## 1. Executive summary

The Code of Ethics and Conduct of Wisedāna Foundation ETS ("Wisedāna") defines principles, responsibilities and practical rules that guide the conduct and decisions of those who operate with and for the Foundation. It is binding upon governing bodies, employees, collaborators, volunteers, consultants, partners, suppliers and any third party acting in the name or on behalf of the Foundation.

It promotes action founded on legality, integrity, independence, equity and impartiality, ensuring transparency and respect. It includes provisions regarding the protection of minors and adults in situations of vulnerability, data protection, occupational safety, non discrimination and attention to the environment. It establishes rules of conduct for relationships with persons and communities, donors, media, partners and suppliers. It defines operational standards on conflicts of interest, gifts and hospitality, responsible communication, fundraising, IT, anti-money laundering and anti-corruption.

## 2. Background and purpose

At Wisedāna we begin from three simple yet profound values: compassion, generosity, wisdom. They are not merely words of principle, but describe the way in which we wish to develop relationships and the compass that guides our decisions.

**Compassion** means recognizing vulnerability - our own and that of others - and acting to reduce suffering without exploiting or sensationalizing it.

**Generosity** means sharing resources, time and decision-making power, valuing local

partners, building trust and sharing results and reflections transparently.

**Wisdom** arises from the union of listening, reflection and the development of skills. In our work, it means making decisions based on data, experience and attention to contexts, while accepting complexity and its limits.

This Code translates those values into clear and verifiable operational rules: how we relate to persons and communities, how we communicate, how we raise and use funds, how we protect data, how we manage conflicts of interest, risks and safety. It is an instrument of shared responsibility, helping us to do the right things well.

The Code applies to all activities of the Foundation, in Italy and abroad, and to all persons who collaborate with Wisedāna - governing bodies, staff, volunteers and collaborators, consultants, project partners and any third party acting in the name and on behalf of the Foundation.

We ask every person involved to know it, apply it and report its violations, because values truly matter only when they become daily, measurable and coherent choices. Compliance with the Code is a condition for the commencement or continuation of relationships with Wisedāna.

### 3. Reference principles: what they mean and how we put them into practice

#### LEGALITY AND INTEGRITY

We always operate in compliance with the applicable national and international laws, tax regulations and provisions on transparency, anti-corruption and prevention of money laundering, both in Italy and in the countries in which we collaborate. Acting with integrity means preserving the trust of the persons who choose to support us, ensuring that every resource is used responsibly and verifiably.

All economic resources are managed through internal control systems that ensure traceability, complete documentation and accountability. Every payment is made through traceable instruments, with clear authorization processes and periodic checks. Gifts, hospitality or other benefits received from anyone interacting with the Foundation must

be managed according to the procedure provided for in this Code and recorded where required, in order to prevent situations that could influence decisions, generate conflicts of interest or compromise our independence.

We carry out due diligence procedures on partners, suppliers and collaborators, proportionate to the level of risk, to ensure that they share our principles of legality, transparency and integrity. We select partners who demonstrate coherent ethical conduct and a credible commitment to respect for human rights, data protection and the prevention of abuse.

The Foundation encourages the timely reporting of suspicious conduct, irregularities or potential violations through internal channels, guaranteeing confidentiality and protection to those who report in good faith.

In summary, legality is not only a regulatory requirement but a foundational value: preserving integrity means preserving trust, an essential condition for generating authentic and lasting change.

## **INDEPENDENCE, IMPARTIALITY AND DIGNITY**

Our decisions are not guided by particular interests but by the public interest and by the pursuit of our mission. We treat everyone with respect, avoiding favoritism, stereotypes and any form of discrimination.

We operate independently and free from external pressures, ensuring that programmatic choices, partnerships, funding and allocations of resources are not influenced by political, economic or social conditioning. Independence is an essential part of our commitment: it enables us to remain faithful to our mission, to serve communities with equity and to protect the credibility of the Foundation.

We do not accept funds, collaborations or forms of support from individuals, companies or organizations whose activities are incompatible with our values and our mission.

## **INCLUSION AND NON-DISCRIMINATION**

We offer opportunities for growth and development by looking at the value dimension and the competencies of the persons and organizations with whom we collaborate, irrespective of any assessment based on gender, psycho-physical abilities, geographical origin, ethnic

background, socio-economic circumstances, religious or sexual orientation.

This commitment translates into the use of respectful and inclusive language, equitable selection processes for collaborators, partners and suppliers, and non-discriminatory criteria in the scouting activities of local organizations. We also maintain confidential channels for reporting any discriminatory conduct, guaranteeing listening, protection and timely management of reports.

## **TRANSPARENCY AND ACCOUNTABILITY**

We make our choices and the way we operate is understandable: how we raise funds, how we use them, what results we achieve and what limits we encounter. We share this information through periodic reports, public indicators and reporting that coherently reflects fundraising messages, donation pages and the activities actually carried out.

Transparency also concerns economic management: we limit the use of cash in payments as much as possible, preferring traceable and documented systems.

## **PROTECTION OF MINORS AND PERSONS IN SITUATIONS OF VULNERABILITY (SAFEGUARDING)**

Protecting minors and persons in situations of vulnerability is a priority responsibility. We reduce risks and commit ourselves to doing no harm: personal stories are not “work material”, but accounts of real lives that require care, respect and protection. We avoid any form of sensationalizing pain and operate to minimize people’s exposure, using only information and content truly necessary to achieve our objectives, according to a principle of parsimony.

We apply rigorous informed-consent procedures: for minors we require the consent of the legal guardian and, where possible, the assent of the minor themselves; for adults in situations of vulnerability we ensure that consent is fully free, informed and revocable at any time. We anonymize data, images and testimonies where appropriate, ensuring adequate protection of sensitive data.

We activate secure and confidential channels for reporting violations or risk situations, ensuring listening, protection and timeliness of intervention. In the event of any suspicion or evidence of risk, we immediately suspend the activities involved and initiate the

necessary checks.

Our commitment to safeguarding arises from profound respect for the dignity of persons and from the awareness that protection is an integral part of our mission.

## **OCCUPATIONAL SAFETY AND WELL-BEING**

A healthy organization protects the persons who work within it, recognizing that caring for psychophysical well-being is an integral part of institutional responsibility. We promote a professional environment that is safe, collaborative and attentive to the needs of those who contribute to the Foundation's mission. We apply structured procedures for the management of incidents and near-misses, constantly monitor workloads and make spaces for listening available to address any difficulties promptly. We foster work policies that support the balance between professional and personal life, including the possibility of remote work, flexible hours and closure periods during holidays.

We also dedicate specific moments to growth, reflection and collective well-being through two annual think tanks that offer protected time to learn, share and strengthen internal relationships. These tools contribute to creating a healthy, respectful working climate oriented towards personal and professional development.

## **DATA PROTECTION AND CONFIDENTIALITY**

Data tell stories of people: for this reason, we collect them only when truly necessary and safeguard them with the utmost care. Every processing activity takes place in compliance with applicable regulations, with clear legal bases, defined purposes and a constant commitment to ensuring that sensitive information is processed ethically and proportionately.

We apply a principle of minimization, collecting only the data indispensable to the performance of our activities, and we define rigorous access controls to ensure that only authorized personnel may consult them. Confidentiality is an integral part of our responsibility towards the persons and communities with whom we work. Protecting data means protecting their dignity, their safety and the trust they place in our work.

## ENVIRONMENTAL SUSTAINABILITY

We act taking into account the impact of our choices on the planet, today and in the long term. We promote an organizational culture attentive to environmental protection, reducing non-essential travel, choosing more sustainable supplies and applying green criteria in the organization of events and in procurement. We commit ourselves to constantly improving our practices in order to contribute to a healthier and more responsible future.

## 4. Ethics of relationships and rules of conduct

### 4.1 People and communities

Our work begins with listening. We meet persons with respect and transparency, clarifying the purposes and limits of our intervention. We pay attention to power dynamics, to prevent the collection of stories, data or images from turning vulnerability into exposure or stigma.

In practice:

1. **Informing first:** We introduce ourselves and clearly explain our objectives, the channels of use of the materials and the right to refuse and withdraw consent.
2. **Consent:** We use standard forms (adults; guardian + minor's assent) for specific consents (e.g. photo yes/no; social media yes/no) with precise dating and defined legal bases; we store these documents in the release forms register on Drive or in the authorized document system.
3. **Respect:** We listen to our interlocutors to avoid overly intrusive or painful questions, preferring open formulations and pauses where necessary, and stopping if signs of risk emerge (safety, stigma, privacy).
4. **Minimization of exposure:** We collect only the information necessary to carry out our work, applying the criterion of parsimony: we do not request non-essential sensitive details.
5. **Review:** Where possible, we offer the persons directly concerned the opportunity to check and approve the quotation/excerpt before publication. In any case, we remain open to receiving ex post reports and to modifying or deleting published content where it may pose a substantial risk to the persons concerned.

6. **Availability:** We always indicate clearly how to report a problem and which person or internal function can receive it.

## 4.2 Donors

Trust is built through transparency and coherence. We always communicate clearly to the persons who support us how the donated funds will be used and what results may reasonably be expected. We report on what we do, including limits and lessons learned.

In practice:

1. **Accountability:** Every message functional to fundraising must indicate the purposes of the campaign, the restrictions on the use of funds (if any) and the sources of the data (if any), taking into account the fact that we prefer a trust-based approach and therefore the use of funds not tied to individual projects and allocated to the realization of a broader mission.
2. **Updates:** Donors are updated in the ways and within the timeframes provided for by the audience segmentation strategy (major donor, middle donor, small donor and DAF). The annual financial statements are published on the website as an instrument of information and transparency.
3. **Independence:** Every possible conflict of interest is declared ex ante; gifts or other benefits that could influence our spending decisions or the orientation of our work are prohibited.
4. **Confidentiality:** The personal data and contact preferences of donors are processed only for legitimate, documented and proportionate purposes, in compliance with the applicable privacy notices.

## 4.3 Public administrations and authorities

We work within the perimeter of legality and honesty. We apply the laws and collaborate with institutions, respecting procedures and controls with a sense of responsibility and availability. In relationships with public administrations and authorities, payments, promises, benefits or undue pressure, direct or indirect, aimed at obtaining improper advantages or influencing public decisions, are prohibited.

## 4.4 Partners and suppliers

We choose partners and suppliers according to fair and transparent criteria, assessing their ethical alignment and environmental and social impact. Collaborations are founded on reciprocal responsibility, respect for shared rules and a common commitment to continuous improvement.

During the selection phase, where possible, we request at least three quotations and carry out due diligence proportionate to the level of risk, verifying essential aspects such as any sanctions, disputes and the existence of minimum policies on human rights and environmental protection. During onboarding, we provide the Code of Ethics, requesting formal acknowledgement of receipt.

In the event of violations of ethical or contractual rules, we activate the measures provided for, up to the possible termination of the collaboration. We also pay attention to the environmental impact of procurement choices, giving preference to entities that adopt green criteria in materials, logistics and the use of energy, and also assessing the CO<sub>2</sub> footprint associated with travel and events.

## 4.5 Media and communication

We recount work in the field with truthfulness, transparency and respect, avoiding harmful, sensationalistic or stereotyped narratives. Images and words must restore context, dignity and agency to the persons involved, without sensationalizing suffering or unnecessarily exposing the persons/communities receiving support.

We have defined two main modalities for the use of images and content:

1. **Public channels:** In open contexts (website, social media, newsletter, events) we avoid showing people's faces unless they have given informed and documented consent. Every person is informed transparently of the effects of publication, including the purposes, modalities of use of the images and the public that may access them. If consent is not given, we use alternative solutions such as generic images, details of activities or group photographs without individual recognizability.
2. **Channels dedicated to major donors:** With regard to major donors, we use

personalized and confidential communications. In this context, a greater level of detail may be shared, including some images of the persons involved, always subject to prior consent. Donors are informed that such materials are intended exclusively to them and may not be disseminated or reproduced publicly without a specific agreement with the Foundation.

The images and stories shared must always be connected to coherent messages about the project and its impact, avoiding any distortion of reality or instrumental use of the vulnerability of the recipient community.

Operational guidelines:

- All materials intended for external dissemination are reviewed before publication by a member of the Communications team and by Management, or by another delegated function;
- Sensitive content is stored securely, with access limited exclusively to authorized personnel;
- Every publication must comply with the applicable privacy regulations and, where relevant, the safeguarding policies provided for by the Foundation;
- Any requests for removal, rectification or limitation of the use of images and testimonies are assessed promptly, giving priority to the safety and dignity of the persons represented.

## 4.6 Conflicts of interest

A conflict of interest may be actual, potential or perceived and arises when a personal, professional, economic or relational interest may influence, or appear capable of influencing, a decision taken on behalf of Wisedāna. The management of conflicts serves to protect impartiality, trust and the quality of decisions.

In practice:

1. **Preventive declaration:** Every person to whom the Code applies promptly declares to Management or to the President of the Board of Directors any actual, potential or perceived conflict situation, before participating in the decision concerned.
2. **Abstention:** The person in conflict abstains from the discussion, assessment and vote or approval of the decision, unless the competent body provides otherwise

with documented reasoning.

3. **Decision:** Management assesses operational conflicts; the Board of Directors assesses conflicts involving Management, governing bodies or decisions of strategic relevance.
4. **Measures:** Measures may include abstention, replacement in the decision-making process, reasoned authorization, modification of the assignment, strengthening of controls or termination of the relationship when the conflict cannot be managed.

## 4.7 Gifts, hospitality and other benefits

Gifts, hospitality, invitations, discounts, favors, travel or other benefits may create improper expectations or compromise the Foundation's independence. They are permitted only when they have modest value, an institutional or courtesy purpose, are not recurring and cannot be interpreted as an attempt to influence a decision.

In practice:

1. **Absolute prohibitions:** Neither cash nor cash equivalents, personal benefits, travel not justified by institutional purposes, or benefits connected to ongoing selection, procurement, funding or evaluation procedures may be accepted or offered.
2. **Communication:** Every gift, hospitality or benefit received or offered, even of symbolic value when it comes from a relevant counterparty, is communicated within 5 working days to the administrative function or to the designated person.
3. **Registration:** Communications are recorded in the Gifts, Hospitality and Other Benefits Register, indicating date, offering/receiving party, description, estimated value, decision taken and reasons.
4. **Decision:** The Foundation may authorize acceptance, request return, arrange sharing with the team or allocate the item to institutional purposes, documenting the choice.
5. **Public Administration:** In relationships with public administrations, authorities and persons exercising public functions, the principle of utmost prudence applies: only institutional courtesies of symbolic value are permitted and never in connection with requests, authorizations, inspections or pending decisions.

## 4.8 Fundraising

Fundraising is part of the Foundation's public responsibility: it must generate trust, clarity

and relationship. Every fundraising activity must be coherent with the mission, with the values of the Foundation and with the principle of transparency towards donors and communities receiving support.

In practice:

1. **Truthfulness:** Campaigns, donation pages, newsletters, events and one-to-one materials describe purposes, needs, expected results and limits accurately and without being misleading.
2. **Coherence between fundraising and use of funds:** When a donation is presented as intended for a specific project or purpose, that restriction is recorded and respected, unless there is different communication and authorization where necessary. The Foundation privileges, where possible, flexible and trust-based funds, communicating this clearly.
3. **Due diligence on relevant donors:** Donations of significant amount, donations from companies, foundations, DAFs, foreign entities or counterparties with a high-risk profile are subject to proportionate verification of the origin of funds, reputation, any sanctions or incompatibility with mission and values.
4. **Refusal or return:** The Foundation may refuse or return donations when value incompatibilities, reputational risks, improper conditions, possible conflicts of interest or doubts about the lawful origin of the resources emerge.
5. **Absence of undue influence:** No donation may grant the donor improper power over programmatic choices, selection of beneficiaries, public messages, impact assessment or governance of the Foundation.
6. **Reporting:** Donors receive updates consistent with their level of relationship and with the commitments undertaken; results are communicated including also limits, learnings and relevant deviations.
7. **Privacy and consent:** Fundraising activities comply with the applicable privacy regulations, contact preferences and the right of persons to discontinue communications or modify their preferences.

## 5. Management of assets, data and information

We manage assets, data and information with accuracy, responsibility and security. Accounting is carried out accurately and promptly, applying a clear segregation of roles, defined approval procedures and internal controls that ensure traceability and

correctness.

We apply anti-money laundering regulations through the identification of counterparties and full traceability of payments. In the management of personal data, we adopt clear legal bases, minimization criteria, security measures by design and structured procedures to identify and manage any data breaches. We store information in dedicated systems that are protected and accessible only to authorized personnel.

In IT and cybersecurity, we use strong passwords, multi-factor authentication where available, encryption of sensitive media, and we limit the use of personal devices in the Foundation's activities. Every access to databases, drives, work tools or archives containing confidential information is assigned according to the "need to know" principle and revoked promptly when the operational need ceases.

The Foundation's physical and digital assets are used for institutional purposes, with care and proportionality. Any loss, theft, damage, unauthorized access or suspected data breach must be reported without delay to Management or to the appointed function, so that the checks and any communications required by the applicable regulations may be activated.

The specific discipline relating to communication, images, stories and sensitive materials is contained in section 4.5 of this Code, which prevails as the operational reference for such content.

## 6. Dissemination, training and monitoring

The strength of the Code depends on its daily application. For this reason, Wisedāna ensures that the Code is known, understood, updated and monitored over time, transforming principles into verifiable practices.

In practice:

1. **Dissemination:** The Code is shared with governing bodies, staff, volunteers, collaborators, consultants, relevant partners and suppliers. Acknowledgement of receipt is documented during onboarding or at the start of the relationship.
2. **Initial training:** Every person who works stably with the Foundation receives basic training on the Code, with particular attention to safeguarding, privacy, conflicts of interest, gifts and hospitality, responsible fundraising and ethical

communication.

3. **Periodic updating:** The Foundation organizes updating sessions at least annually or when relevant regulatory, organizational or operational changes occur.
4. **Monitoring:** Management, with the support of the competent functions, monitors the application of the Code through documentary checks, analysis of reports, the conflicts register, the gifts and hospitality register, incidents, near-misses and feedback from the team, partners and communities.
5. **Review:** The Code is reviewed at least every two years, or earlier in the event of relevant changes, to verify its effectiveness, clarity and coherence with the Foundation's mission.
6. **Continuous improvement:** Any critical issues emerging from monitoring give rise to corrective measures, updates to procedures, training integrations or revisions of the operational annexes.

## 8. Disciplinary and sanctioning system

Violations of the Code are assessed case by case, in compliance with the principles of proportionality, graduality, impartiality and adversarial procedure. The assessment takes into account the nature of the violation, intent, the seriousness of the risk or harm, any recurrence, the cooperation provided and the corrective measures already adopted.

The consequences may include, depending on the relationship with the Foundation and the gravity of the facts: written warning, request for training or corrective measures, limitation or revocation of assignments, suspension, termination of the contractual or collaboration relationship, exclusion from activities or partnerships, request for restitution or recovery of damages, reporting to the competent authorities when provided for or appropriate.

For partners, suppliers and third parties, violation of the Code may entail activation of contractual remedies, up to termination of the relationship. For governing bodies, staff, volunteers and collaborators, measures are adopted by the competent bodies or functions according to the applicable regulations and internal procedures.

The Foundation privileges, where possible and proportionate, measures that correct the

conduct and reduce future risk; however, serious conduct or conduct incompatible with the values of the Foundation may entail immediate termination of the relationship.

## 9. Entry into force

This Code was approved by the Board of Directors on June 16, 2026 and entered into force on the same date. The date of approval must be completed before any formal dissemination. Each updated version replaces the previous one.

The Code is made available through internal channels and, where appropriate, on the Foundation's website. Previous versions are archived for purposes of document traceability.