



# CODE OF ETHICS

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**STILL I RISE**

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## **STILL I RISE**

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# SECTION 1 | OUR MISSION

## I. MISSION AND VISION.

Still I Rise is a nonprofit organization that provides world-class education to refugee and vulnerable children around the world.

Our mission is to end the global education crisis. We open schools to empower the most vulnerable and, through our revolutionary educational model and tireless advocacy work, throughout our existence we aim to ensure free, high-quality education for all children who would otherwise go without.

Our mission is to change the world one child at a time.

## II. OUR VALUES.

We are independent, transparent and efficient, which is why we actively reject funding from governments, the European Union and the United Nations. Our operations are based entirely on private donations, which are carefully screened through a rigorous due diligence process.

We create our projects from the real needs of the communities in which we operate. Therefore, we have formulated two different approaches to education: the Emergency and Rehabilitation Schools and the International Schools.

In the first approach, intervention takes place in volatile contexts through the proposal of a versatile curriculum for the recovery of minors and their rehabilitation: the ultimate goal is to enable their reintroduction into public schooling. The model also addresses basic needs such as nutrition, hygiene and child protection, as well as psychosocial support to regenerate the well-being of the child and his or her family unit.

In the second approach, intervention takes place in more stable settings, where migrant people settle for the long term. Here we bring high-quality education to those who could never access it: we are the first nonprofit organization in the world to offer the International Baccalaureate pathway exclusively to refugee and vulnerable minors.

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Through our International Schools, we guarantee an education of high 7-year level, completely free of charge, which can open the doors of the world's best universities to them. Our ultimate goal is to train the new leaders of tomorrow.

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## SECTION 2 | ETHICAL PRINCIPLES.

Our intervention aims to provide a humanitarian response based on the educational needs of children in crisis contexts caused by natural disasters or man-made events.

### I. FUNDAMENTALS OF OUR WORK.

We are committed to the tenets of international law in this regard and act on four basic principles:

#### 1. HUMANITY

We follow and apply the principle of humanity. Wherever our actions take place, priority will always be given to an approach that protects life and health while respecting human beings. We respect the human rights enshrined in the Universal Declaration of Human Rights. We recognize that all individuals are born free and equal; likewise, we denounce any organization or individual that harms the dignity of others. We respect the right to religious freedom of every individual who works with us, our partners or our beneficiaries.

#### 2. TRANSPARENCY

We act in accordance with the principles of truth and fairness in dealing with supporters and the public. We are accountable to donors as well as to the people we support in any action we take.

We are committed to devoting the majority of our financial resources to our programs and activities through minimizing operating costs and scrupulous stewardship of donations. Those who choose to support Still I Rise can allocate their donation to a specific project or to the entirety of operations, receiving periodic updates on the use of funds and the results achieved.

#### 3. OPERATIONAL EFFICIENCY

We listen to the real needs of the people we support and empower communities

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and local leaders to solve the problems they face, ensuring an efficient and effective approach to implementing educational programs.

Our structure allows for rapid connection between all members of the organization: this allows us to carefully analyze each situation and act quickly and purposefully in responding to our mission needs.

#### **4. INDEPENDENCE**

We follow the humanitarian principle of operational, political and economic independence. We do not accept funds from national and supranational governmental bodies, including the European Union and the UN: this choice is intended to ensure the autonomy of our activities and the freedom to denounce the violations we often witness. We do, however, accept funds from individuals, companies and foundations, as long as they are in line with the provisions of this code of ethics (see Section 4).

As a nonprofit organization, we act in the sole interest of our end recipients and the communities in which they are embedded.

We do not act in the interest of any state, political party, company or third-party entity: all funds raised are exclusively geared toward achieving the goals set by Still I Rise, for the benefit of the children we support.

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## SECTION 3 | HUMAN RESOURCES.

Our intervention is aimed at developing and consolidating our educational work, which is embodied in the provision of psychological support, interaction with local social realities, actual education programs, and finally also the dissemination of the Still I Rise method in the world.

**Qualified** personnel: we employ highly qualified personnel who possess the necessary skills and experience to ensure the quality of our educational programs and their effectiveness in promoting social change through education. Each employee or collaborator of the association undertakes to carry out his or her work with diligence, prudence and expertise, using the tools and time at his or her disposal to the best of his or her ability, as well as according to a principle of accountability related to the duties required by his or her role.

**Commitment to the code of ethics:** the staff of Still I Rise, in which we consider both employees and volunteers, pledge on their honor to adhere to the principles and values of the organization reflected in this code of ethics. Each team member is expected to understand and apply in their daily behaviors the fundamental principles that guide our work.

**Motivation from principles:** our staff is driven by keen interest in the educational field and the operational contexts in which Still I Rise operates. Each team member shares a passion for education as a means of social transformation and works hard to ensure that the rights of refugee and vulnerable children are respected and protected.

**Training and development:** we support the ongoing training of staff to improve their professional skills and to ensure greater awareness of issues related to education, human rights, and geopolitics, enabling them to address challenges in an informed and empathetic manner.

**Child Protection:** Still I Rise personnel recognize their role in child protection and are committed to promoting a safe environment for boys and girls, preventing and reporting any cases of abuse or exploitation before the relevant local, and other, judicial authorities, and in accordance with the provisions and statutes of national and international legislation, including with reference to special legislation, on the

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subject.

## I. CONCEPT OF REPRESENTATION.

Still I Rise staff are connected to the organization not only to work on projects and pursue the association's mission (see Section 1, I) , but also as active representatives: each staff member is a direct expression of the organization's values and goals at all times and for no reason acts on an individual basis.

## II. HR POLICY.

Still I Rise has developed and implemented an **ecosystem of** actions for its employees, both the team working remotely and the teams working in the field, to make the most of its human capital.

Our **corporate culture**, based on the values of ambition, courage, and care, is the determining factor in holding the entire organization, which operates on different continents and often in critical situations, together in pursuit of our goal successfully and over time. It represents our organizational identity, also expressed through our values of independence, efficiency and transparency, which represent the synthesis of what our organization believes in and in which our employees fully identify.

Still I Rise has built a **work environment** that ensures that every individual in it is fully aware of the purpose of their work, their responsibilities, and has the tools to be able to establish the necessary relationships, adopt the most correct behaviors, understand and follow the most **efficient and streamlined** processes and procedures **at the same time**, and effectively share any useful information with colleagues in order to achieve our goals in a practical and lasting way.

This is through **effective governance** that aims to maximize the level of collaboration, agility and innovation possible to pursue our goal.

The **Board of Directors** works together to always be in a position to make decisions, with a strong aspiration to successfully achieve the purpose this organization sets for itself and with an entrepreneurial, rather than managerial, mindset. It also fosters a culture that can give employees autonomy, energy, and a direction to follow, thus creating leadership at all organizational levels, i.e., a high generalized degree of

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empowerment and at the same time autonomy.

The **HR team** has put together a set of services that aim to make our employees' experience within our organization a highly educational and satisfying professional and human experience.

In addition, it has systematized a workforce planning system so as to achieve proper management of personnel cost and related turnover, two key elements in managing its resources effectively and efficiently. Workforce planning is fully integrated with the human capital enhancement strategy.

These two elements are instrumental in creating a workplace that is in line with our mission and therefore apt to ensure that our employees are sensitized and motivated to best achieve our vision.

### **III. ADMINISTRATIVE APPROACH.**

Still I Rise is headquartered in Italy, in Rome. The organization is based on a streamlined structure with as few corporate levels as possible; this makes the decision-making process efficient and the result of constant discussion among the members of the Board of Directors through periodic meetings, and within the BoD through voting mechanisms.

In detail, the decision-making process goes through the following bodies and figures:

1. **Board of Directors;**
2. **Executive Board** (composed of CEO, COO, CFRCO, CSO, CHRO, General Counsel);
3. **Operational managers;**
4. **Staffing** of headquarters and field programs.

Final decisions on major issues are made collectively by the Board of Directors, after consultation with the directors and managers of headquarters and programs.

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#### **IV. CONFLICT OF INTEREST.**

Our organization's representatives believe that the goals of the organization are paramount and never use their position for personal gain: the Board of Directors does not make decisions that would benefit a representative, and its members should not be involved in other organizations or activities that could lead to a conflict of interest. In addition, the Board of Directors checks each program's compliance with the overall mission statement and monitors projects for which it is responsible, or delegates to a team of coordinators working under its direct supervision.

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# SECTION 4 | ETHICAL RULES TOWARD OTHERS

## I. SOURCE OF FUNDS.

We are completely independent: we do not accept funds from governments, the European Union, the United Nations and other large supranational organizations. The existence of our missions depends entirely on private donations from individuals, groups, companies and private foundations who believe in our work.

In keeping with the principles that guide us, the ethical funding policy for the sourcing of funds aims to ensure:

1. consistency between our stated values and those that permeate the behaviors implemented by partners/donors in their actions;
2. the protection of reputation so that it is not jeopardized as a result of partnering with companies or entities that violate the principles of Still I Rise;
3. the protection of Still I Rise from possible conflicts of interest arising from donations from companies, entities, or individuals whose scope of activity interferes with specific campaigns we promote;
4. the integrity of Still I Rise in a context of increasing globalization in which the spheres of action of corporate partners often cross national boundaries.

## I.I. POLICY FOR COMPANIES, FOUNDATIONS, SOLE PROPRIETORSHIPS.

In order to develop a partnership with Still I Rise, the company, foundation, corporation, or sole proprietorship (also referred to hereafter as "company") must meet specific requirements.

In particular, it must not:

1. be in conflict with our humanitarian mission;
2. be contrary to Still I Rise's code of ethics and the principles of humanity, transparency, efficiency, and independence;
3. pose a risk to safety, to the work of Still I Rise staff, or to direct beneficiaries;
4. produce negative consequences on the image and/or reputation of the organization.

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Our decision to finalize or not finalize a partnership with a company is made on the basis of a rigorous and comprehensive civil due diligence and ethics screening process designed to ensure that our principles are protected.

First, our organization ties a company's acceptance of financial support to its membership in specific product sectors.

We will not accept any financial support from:

- Companies involved in the production of Weapons and Armaments
- Companies involved in Tobacco production
- Companies operating within the Mining Sector (Oil, Gas, Mining)
- Gambling companies
- Companies that finance or support the activities of companies belonging to one of the above sectors
- Multinationals operating in the Pharmaceutical Sector.

With reference to cross-shareholdings, we will not accept donations from de facto subsidiaries of or controlling third companies among those listed above.

Companies belonging to other sectors will be subject to ethical screening by the Still I Rise Board of Directors, with particular attention to entities operating in the area of Alcohol: in relation to this area, small manufacturing companies that enhance local cultural traditions will be given preference, while larger entities will be evaluated individually. In general, the organization will not accept funding from companies that use materials from endangered animal species. Based on the analysis and results obtained, the possibility of receiving financial support will be evaluated on a case-by-case basis.

We carry out a thorough check of the source of funds of donor companies, analyzing the existence of relevant convictions, litigation and/or scandals against the company: if critical issues are detected, we will proceed to reject the donation in any form and any type of collaboration.

Critical issues may relate to: violation of basic human rights, exploitation of child labor, relations with organized crime, arms trafficking, money laundering, illicit trafficking in the broadest sense, behaviors or activities harmful to the environment and animals, past convictions for serious crimes of CEOs of the company or relevant

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exponents, ongoing judicial investigations of the same for the above crimes. Other specific cases will be evaluated individually.

**II. MONEY LAUNDERING.**

Still I Rise, in compliance with the laws and provisions, national or international, in force on the matter, as well as in accordance with the principles and provisions contained and specified in this Code of Ethics, and with the provisions of the ethical financing policy, condemns and expressly prohibits activities, actions and behaviors that directly, or even only indirectly can be traced back to operations aimed at and/or otherwise oriented, even if only to favor, money laundering phenomena coming from illicit and/or criminal sources, making itself, as well, an active and diligent part in the fight against the phenomena of terrorism, as more specifically indicated in the appropriate AML/CFT policy, adopted by the association and directly available on the website in its updated version. In this regard, before establishing relationships or entering into contracts with partners we will ensure that they share the same principles of transparency and legality as we do.

**III. CORRUPTION.**

In the course of conducting business, we prohibit any action toward or by third parties tending to promote or further their own interests, take advantage of or interfere with each other's impartial and independent judgment. To this end, we undertake to take all necessary measures to prevent and avoid cases of bribery and any other type of conduct capable of inducing or facilitating the danger of committing the crimes provided for by law. In this sense, we do not allow the payment or acceptance of sums of money by third parties who give or favor any of us in order to obtain direct or indirect advantages. Likewise, it is not permitted to accept gifts and gratuities from third parties except to the extent of modest value or falling within normal courtesy, and in any case such as not to compromise the integrity or reputation of the association, its employees and volunteers.

**IV. DONOR RELATIONS AND FINANCIAL TRANSPARENCY.**

Every donor has the right to receive information and constant updates about how funding is being used. We are committed to providing information about the reasons for fundraising campaigns and the progress of current programs.

In case the donor wishes to allocate his or her donation to a specific cause, we will

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respect the request. Monetary donations may be made through the institutional channels made available by the organization and published on the website; money transfers to individual accounts are not permitted, except in exceptional circumstances, always in accordance with the principles and what is stated in this Code of Ethics. Donations in goods and services are accepted, as long as they are in line with the mission, the Code of Ethics and the needs of the programs implemented.

Every donor has the right specifically to be informed about:

- Mission and goals pursued by Still I Rise
- Operational structure of the organization
- Ways of using one's donations
- Achievements
- Tax benefits

The organization's annual report is available at [www.stillirisengo.org](http://www.stillirisengo.org)

## **V. RELATIONS WITH PUBLIC ADMINISTRATION, INSTITUTIONS, JUDICIAL AUTHORITIES.**

The relations of our organization with Public Administration, Italian institutions and international institutions are marked by compliance with the national and international legal provisions in force, as well as with the special legislation on the subject, and with the criteria established in this Code of Ethics. Still I Rise also guarantees maximum cooperation with respect to ongoing investigations or proceedings conducted by judicial authorities .

Still i Rise staff are forbidden:

- Offering to Public Officials, employees of Public Offices or Institutions, payments, goods, benefits, or gifts (unless of modest value or within normal courtesy relations) to promote or favor the interests of Still I Rise;
- Solicit confidential information and/or improperly influence the decisions of a public institution;
- Maintain relations with representatives of the Public Administration in the absence of appropriate delegation, power of attorney, authorization or if not provided for by the role assigned within the organization.

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## **VI. PARTNERSHIPS, TESTIMONIALS, SUPPLIERS.**

We collaborate with other legal entities only in the presence of a commonality of purpose, sharing of our mission, and in the absence of critical issues related to the violation of fundamental human rights, exploitation of child labor, relations with organized crime, arms trafficking, money laundering, illicit trafficking in the broadest sense, behaviors or activities harmful to the environment and animals, previous convictions for serious crimes, or ongoing investigations of the same.

We have relationships with other NGOs and charitable organizations in all places where our activities are implemented: we collaborate across boundaries of politics, religion, culture, and ethnicity, within the boundaries of organizational vision, and with organizations and individuals who share common values and goals.

We do not accept relationships of dependence with other organizations, with for-profit entities, nor to be connected in any way to their interests, nor to have relationships that may restrict the organization's freedom of movement and decision-making with respect to its stated goals and objectives

The same parameters apply to relationships with testimonials, ambassadors and suppliers of goods and/or services for Still I Rise.

With specific regard to relations with suppliers Still I Rise imposes compliance with the laws and regulations in force in all the countries in which it operates (in the case of suppliers operating in Italy, compliance is also required with Legislative Decree 231/01), in addition to compliance with the rules of this Code of Ethics.

In dealings with suppliers, all employees and collaborators must prioritize the interests of Still I Rise, refraining from conduct aimed at gaining personal advantage.

To this end, employees and collaborators are required to comply with the provisions of the Finance Policy, specifically in "Section 3 Procurement," regarding the selection and management of suppliers of goods, services, works, and the awarding of consulting assignments.

In the case of entering into contracts or agreements with suppliers, it must be expressly stipulated that they must comply with the principles set forth in this Code

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of Ethics.

Still I Rise expects the highest standards of honesty and accountability from its suppliers, and takes all necessary steps to avoid connections with persons or organizations involved in illegal or unethical practices.

Still I Rise will not initiate or follow up any relationship with anyone who does not intend to align with this principle.

## **VII. ADVOCACY.**

We believe deeply in the power of change and are spokespeople for relevant humanitarian causes before the public and political stakeholders directly concerned: our goal is to find solutions and concrete answers to the problems we face in our missions.

Actions put in place include strategic communication campaigns and direct relations with members of institutions identified as interlocutors from time to time, in compliance with the principles listed in this Code of Ethics (*see Section 4, V. - Relations with Public Administration, Institutions, Judicial Authorities*).

Every advocacy initiative undertaken is consistent with our mission and closely related to the activities implemented.

## **VIII. PRESS, MEDIA & COMMUNICATION.**

Still I Rise's relations with the press and media are managed by the organization's in-house Press Office.

The relationship with the press and the media is based on the principles of cooperation, transparency, accuracy and honesty in the processing of information and protection in the processing of personal data in accordance with the relevant statutes of EU Reg. No. 679/2016 (GDPR) and national and international legislation, including the special one.

The information issued by the press office is faithful to the principles of the deontology of the Italian Order of Journalists and the Treviso Charter, in the protection of the privacy of minors for which we stand.

Photographs of minors afferent to Still I Rise schools are disseminated through social

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and print channels with prior consent of parents and/or legal guardians.

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