

**CIVIL SOCIETY ORGANIZATION
PSYCHOSOCIAL INNOVATION NETWORK
[MREŽA PSIHO SOCIJALNIH INOVACIJA]**

CODE OF CONDUCT

Belgrade, 7 June 2023

The Association "Psychosocial Innovation Network" [Mreža psihosocijalnih inovacija] with registered headquarters in Belgrade, Gospodar Jevremova St. No 48, identification number: 28171803, TIN: 108955712, represented by the President Maša Vukčević Marković (hereinafter referred to as the "Employer"), pursuant to the provisions of Article 192 Paragraph 1 Item 1 of the Labor Law, and the Employee Handbook that is in force at the Employer, hereby adopts this Code of Conduct in Belgrade, on 21 December 2018, as follows:

PREAMBLE

This Code of Conduct ("Code") shall apply within the Association "Psychosocial Innovation Network", hereinafter referred to as "PIN". The Code is a framework of guiding principles for professional and ethical conduct, which are the key values in PIN's operations. PIN operates in accordance with regulations and good business practices, adhering to the highest ethical standards, while taking into account the safety and health of both employees and beneficiaries, as well as all partners with whom we cooperate, with the aim of providing incomparable services and products.

The Code is binding for all our employees, persons who are otherwise hired or persons who, on the basis of a power of attorney, contract or other legal matter, represent PIN or their interests. Unless the context indicates otherwise or if it is so noted, any mention or reference to the "employees" shall be interpreted as mentioning or referring to all the aforementioned persons, and such provision shall accordingly apply to any and all such persons.

No one, including the PIN employees, shall not have the right or authority to order or induce others to act contrary to the Code. It is the duty and right of every employee to report any violation of the Code.

VIOLATION OF THIS CODE OR FAILURE TO REPORT VIOLATION OF THE CODE SHALL CONSTITUTE VIOLATION OF THE EMPLOYEE'S WORK OBLIGATIONS, AND THUS IT SHALL REPRESENT VALID CAUSE FOR TERMINATION OF THE EMPLOYMENT CONTRACT.

PIN is committed to the development of good relations within the local community, and strives to be established as socially responsible via resolute application of this Code by all of their employees.

For the purposes of this Code, the following definitions apply:

- **Sexual exploitation** means actual or attempted abuse of a position of vulnerability, power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual abuse** means actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

PIN puts the human rights, interests and needs of all victims of sexual exploitation and abuse in the focus of its efforts and adheres to the principles of "do no harm", confidentiality, safety and non-discrimination when responding to allegations of sexual exploitation and abuse.

In cases involving children, all decisions made by PIN regarding the prevention, and respecting and promoting children's rights, are guided by the best interests of the child and the right of the child to participate and to be heard.

Ensuring compliance with the rules of this Code is our collective responsibility and each of our employees, partners, and other associates has an important role in this regard. No job is important enough to ignore the basic ethical principles prescribed by this Code. The risks must be constantly assessed and controlled within acceptable limits, in order to prevent any kind of breach or violation of the personal rights of our employees, our beneficiaries, as well as the personal rights of third parties.

PIN is obliged to condemn and sanction every act of abuse, regardless of the person towards whom it is directed, and regardless of the person who passively or actively carries out such act.

1. General guidelines

The principles and rules established by this Code apply fairly and equally to all employees. Application of this Code must not, in any circumstances, endanger the individual rights of employees. One of the most important objectives of the Code is to ensure a healthy, safe and professional work environment, and to - through the consistent and conscious application of this Code - develop PIN culture that will help everyone in their personal and professional development.

PIN employees are required to familiarize themselves with the Code in detail and to apply it consistently in their daily tasks and duties. In case of need for clarification of the Code, each employee can always contact the Person responsible for the implementation of the Code. In addition to the Person responsible for the

implementation of the Code, Ethics Committee shall be formed with the aim of establishing a more efficient, impartial and independent control system for compliance with the rules prescribed by this Code.

Failure to comply with the Code by employees constitutes a violation of their work obligations, i.e. , non-compliance with discipline in the workplace, and may lead to material liability as well as sanctions related to their employment status, including termination of employment.

Failure to comply with the Code by PIN members, persons hired under contract, PIN agents or representatives, may lead to the material responsibility of such persons and their dismissal, termination of contract, i.e., withdrawal of authority.

1.1. PURPOSE OF THIS DOCUMENT

The purpose of this Code is to provide:

1. Maintenance of high standards of behavior in the workplace and work productivity;
2. Maintenance of high moral and ethical standards with the help of developing fair rules of conduct and work that would apply to all employees without distinction;
3. Development of the PIN culture which will create a professional and dynamic environment for employees who will be motivated, dedicated to work and satisfied with their working conditions and personal achievements;
4. Maintenance of high moral and ethical standards in working with PIN beneficiaries.

The Code applies to all employees who shall be obliged to apply the standards prescribed in this document in their conduct.

1.2. ESTABLISHMENT OF EMPLOYMENT RELATIONSHIP, EMPLOYEE HEALTH, OCCUPATIONAL PROTECTION AND SAFETY

PIN will organize the recruitment process, i.e. in another way of engaging third parties, in a way that will ensure the verification of the identity of the persons hired, whether they had been convicted for sexual or other abuse, whether they had ever refused to participate in an investigation related to sexual or other abuse, to the maximum extent permitted by law. This obligation shall be considered fulfilled after the employee fills out the appropriate questionnaire, after checking the statements from the questionnaire on the basis of checking the references from the submitted CV, within the framework of the recruitment process before the employment contract is concluded.

PIN primarily takes care of protecting the health, safety and security of their employees and beneficiaries, with the aim of preserving good health and a safe working environment, as per positive legal regulations and internationally recognized standards. It is a joint responsibility of PIN and all employees to achieve this goal.

Employees are expected to, during their work in the field, as when they are in PIN premises and work spaces, adhere to any and all safety procedures and continuously look for ways to improve processes to ensure safety and health, as one of our core values.

Any security issue must be dealt with immediately. Therefore, it is necessary for the employee to report any potential danger to their immediate supervisor without delay. If an employee notices something they deem unsafe or if they have any questions related to safety, they should contact their immediate supervisor, the person responsible for occupational safety

and health, to the person responsible for implementing the Code.

Threats or violence, as well as abuse of any kind, are in direct conflict with our commitment to health and safety, and our other values, and shall not be tolerated in PIN. Employees are obliged to treat their colleagues and any other persons with utmost respect, and to report any actions or conduct that threaten or endanger them, any other PIN employee or beneficiary to the Person responsible for the implementation of the Code.

We expect for our employees to take care of one another, as well as of our beneficiaries.

1.3. RESPECT FOR HUMAN RIGHTS

All employees shall act in a conscientious and diligent manner, respecting their colleagues and other persons with whom they may come into contact in the course of their work. PIN insists on respecting human rights guaranteed by Serbian regulations and international laws and policies. Each employee is obliged to respect human dignity, privacy, diversity, equality and the rights of every individual with whom they may come into contact in the performance of their duties and tasks.

Actions that can cause or contribute to the violation or prevention of the exercise of human rights in any way, or that directly or indirectly induce others to violate human rights, are strictly prohibited.

Discriminatory behavior in any form is prohibited in PIN, both towards their employees and other associates, and towards their beneficiaries.

Equality is a primary value in any practice that concerns the relationship of PIN with natural persons. In this connection, negative discrimination based on race, skin color, gender, sexual orientation, age, disability, language, religion, national affiliation or social origin, financial status, political affiliation or other status is not allowed.

Humiliating treatment of any person is not allowed, and if it occurs, it will be severely sanctioned.

The Association will strictly sanction any form of abuse, any form of abuse cover-ups, and any

form of negligent behavior towards information about a committed or planned abuse.

PIN acknowledges the right to freedom of association. Although respecting the employees' rights to their personal political activity, assets and resources of PIN members may not be used for political activism.

PIN fully adheres to the regulations governing the protection of whistleblowers by applying the provisions on the rights of whistleblowers, whistleblowing procedure, as well as on other matters relevant to whistleblowing and protection of whistleblowers in their internal policies and by-laws.

1.4. CORRUPTION AND BRIBERY

PIN strictly follows any and all regulations governing the fight against bribery and corruption. Employees are strictly prohibited from providing financial or other benefits to another person, institution or organization in order to secure an improper commercial advantage or service to PIN.

At the same time, it is strictly forbidden to receive or accept financial or other compensation in exchange for providing a commercial benefit/service to another natural or legal person (e.g. when choosing a supplier, upon employment, etc.).

PIN may be held responsible for any bribe offered by a third party acting on behalf of the Association, regardless of whether they act with or without PIN's knowledge. Therefore, it is of paramount importance for anyone who acts on our behalf or represents our interests to familiarize themselves with this Code, our business practices, and our policy of fostering ethics and transparency in business.

1.5. CONFLICTS OF INTEREST

PIN acknowledges individual rights of employees to their private lives and private interests. Likewise, our employees are expected to be honest and loyal to the Employer and their interests. Employees must not undertake actions or have any interests that could compromise their professionalism and objectivity in performance of their duties.

Personal benefit and convenience must never give precedence to business. Each employee is obliged to report the performance of any commercial activity outside of their employment to the PIN President. This obligation exists regardless of whether the activity is formally

registered or not, regardless of whether the employee performs the activity independently or together with others, and regardless of whether the employee only has an ownership interest in another business entity or carries out tasks in addition to the above. Performance of any

activity competitive to those of the Employer is strictly prohibited. An employee may not work in any form of engagement for legal entities or entrepreneurs whose registered activity is competitive to those of the Employer, i.e. the Association, not even in the case that such entities actually perform a competitive activity, regardless of the activity that is formally registered. It is essential to avoid conflicts of interest wherever possible. Employees may not participate in decision-making or influence decision-making, reaching an agreement or concluding a legal transaction if there is a conflict of interest or any circumstances that may be grounds for questioning someone's impartiality. A conflict of interest may, inter alia,

refer to beneficiaries, employees and candidates for employment, competitors or business activities outside of employment or regular work. Also, a conflict of interest exists when an employee's personal interest extend to a member of the employee's family. Each employee is obliged to inform the PIN President without delay of any actual or perceived circumstances involving personal interest or conflict of interest. Employees are responsible for understanding and avoiding situations that may lead to conflicts of interest. We especially emphasize a conflict of interest that may arise when an employee accepts any engagement with a legal entity that is or will become a beneficiary, supplier or competitor.

In the event that an employee is not sure whether a particular activity may represent a conflict of interest, it is necessary to obtain written approval therefor from the Director of the Association.

1.6. GIFTS AND HOSPITALITY

Employees must be cautious when it comes to giving or receiving gifts and expressions of business appreciation. It is strictly forbidden to accept gifts or other rewards or favors where there is a reasonable suspicion that it is made with the intention of influencing the party to whom it is being given.

Employees must observe the following rules regarding gifts and hospitality:

- It is allowed to give or accept a gift, i.e. provide hospitality intended for a legitimate business purpose, whereas it must be reasonable in value, not uncommon in business and is not provided in exchange for a specific benefit or action, i.e. cannot put any employee or the Association in an inappropriate position if they were to be discovered;
- It is allowed to accept a gift of symbolic value provided that it represents a common and standard practice within the business, and that frequency of such gifts is not excessive. E.g. a smaller gift from the client with the company's logo as a sign of good business cooperation;
- Gifts that exceed normal and standard business practice must be reported to the human resources manager, who is obliged to keep records thereof. Examples of such gifts include certain gift vouchers, trips, seminars, trainings, educations, entertainment events, etc.;
- The budget or resources of the Group members must not be spent for the purpose of making payments to state authorities, or as bribes or payments to employees in other companies;
- In addition to the above, using third parties to carry out a certain prohibited activity or conceal bribes in the form of compensation, refund, etc. is strictly prohibited.

If an employee is not sure whether a certain offer or acceptance of a gift meets the requirements set forth in this Code, it is necessary for them to obtain written approval from the Director.

1.7. ACCOUNTING RECORDS

PIN properly records all business changes in accordance with domestic laws and the principles of good accounting practice.

Employees are responsible for correctly expressing and documenting all business changes in the scope of their work, in accordance with the current accounting practices. Final and interim calculations are made in accordance with the law, International Accounting Standards, and principles of good accounting practice.

No one, regardless of the hierarchical level of their position, has the authority to force or induce an employee to do anything that is illegal or unethical. If an employee feels under pressure to do the opposite or feels any discomfort in the view of accounting records accuracy, they must it is necessary to inform the Person responsible for the implementation of the Code thereof.

1.8. ENVIRONMENT

In its operations, PIN adheres to the relevant local and internationally recognized standards, minimizing its impact on the environment and constantly improving its results in the field of environmental protection.

As an Association, we are committed to protecting people and the environment by promoting environmentally safe technologies and activities aimed at preventing pollution, promoting recycling and reducing waste. Our employees are expected to respect the environment and to ensure that their activities do not harm the environment or have an adverse

environmental impact. In this regard, our employees are obliged to comply with all laws, policies, permits and regulations related to environmental protection, and to find a way to improve the Group's performance in terms of environmental protection and efficient consumption of energy and resources in every aspect of their work.

1.9. DATA PROTECTION

PIN's business data, database and technical information represent a competitive advantage in the market. All of our employees are responsible for protecting and respecting business secrets, and all other confidential information obtained in the course of their work. They are prohibited from disclosing them, either to other colleagues or third parties, whether orally, electronically, in writing or in any other manner.

As an Association, we are committed to protecting the confidentiality of information related to our business, our employees and partners. The matter of confidential information, storage and disposal thereof is regulated by PIN's internal procedures. Confidential information include any and all business secrets

and personal data as defined by the relevant regulations, as well as any other information that has commercial value or may harm a PIN member if disclosed to third parties. Confidential information may include all types of information, notices, documents, personal data and any confidential and other data, regardless of their

format, whether written or oral, budget, project plans, marketing strategies, financial statements that are not publicly available, information on employment, compensation and benefits, employees, etc. The employees are obliged to safeguard and carefully handle confidential information as they would protect their personal data, and must not disclose confidential information to other persons (whether they are employed with PIN or not) if those persons are

not authorized to see such confidential information, except when the disclosure or delivery of such information is required by law. The obligation safeguarding confidential information shall continue even after an employee stops working with PIN. Upon termination of employment, former employees are not allowed to share confidential information with their new employer, or any other person.

1.10. PERSONAL APPEARANCE AND CONDUCT IN THE WORKPLACE

The appearance and conduct of our employees directly promote PIN and its values. At PIN, we believe that a formal business attire allows an employee to feel dressed up for any business situation.

An exception to this standard can be envisaged for positions that are not externally exposed. When employees participate in meetings or attend events with persons outside of PIN, the use of standard attire is recommended, unless the circumstances or the event invitation indicate otherwise.

1.11. PROPERTY AND ASSETS

PIN expects that the employees use PIN's property solely for the purpose of efficient performance of their duties, with the obligation to preserve it and to act rationally during its use, protecting it from loss, damage or abuse.

Everything owned by PIN is included in PIN property:

- **tangible property** – equipment, vehicles, inventory, etc.;
- **finances** – cash, money in bank accounts, creditworthiness, etc.;
- **technology** – computer hardware, software, information systems, mobile devices, etc.;
- **intellectual property** – work-for-hire, business methods, know-how, design, etc.;
- business methods, designs

Employees are not allowed to use PIN property for personal purposes or to give it to third parties without obtaining a special permission; to alienate or embezzle company property; to handle company property without authorization; they must follow the instructions indicated on the means of work; they not allowed to destroy or damage company property due to negligent or malicious behavior; and they not allowed to cover up damage caused by the use of the property.

It is strictly forbidden to download, copy or share software, as well as copyrighted works and databases, unless the employee has received special permission to do so.

Permission can only be given by the PIN President. Illegal downloads represent violation of copyright laws, and may damage beneficiaries, employees and PIN.

All employees are responsible for PIN's property they use, and in that regard, the employees must:

- take care of the space they work in, and leave the offices and desks tidy at the end of the day;
- treat the devices they use in their daily work with care, take care of the correctness thereof, and follow the instructions for use;
- treat company-owned motor vehicles with care – operate them in accordance with regulations and instructions for use; ensure that motor vehicles are parked in such a way so as to minimize the risk of potential damage; drive vehicles so as to optimize fuel consumption;
- rationally use electricity – cooling/heating system, as well as other major consumers of electricity. Employees are obliged to turn off all computers, air conditioners, lights when leaving the office, and to rationally use consumable office supplies, printers, photocopy machines, etc.; and to
- rationally use office supplies.

2. Communication

2.1. COMMUNICATION STANDARDS

The employees are expected to behave professionally on a daily basis, both in internal and external communication, as per the business etiquette, whereas showing due respect for their superiors/colleagues/business partners/beneficiaries/etc.

Oral communication implies a respectful relationship. It is required to address the other party with respect to their status and age. At PIN, the application of etiquette foresees making T–V distinction, unless a more forward relationship has been established with the other party due to long-term cooperation.

In communication, it is expected to apply professional attitude, respect for cultural differences, respect for the personality and integrity of the other party. Treating the other party in a way that endangers their personal integrity and insults their dignity is considered inappropriate and prohibited. A business-appropriate manner of answering the phone, business correspondence via e-mail is mandatory (slang is not allowed, nor is the use of swear words).

2.2. INTERNAL COMMUNICATION

Communication, i.e. uninterrupted conveying of information between two people, is one of the most important prerequisites for the success of PIN's complex operations.

Accordingly:

- Each employee must inform their supervisor in a timely and accurate manner about the functioning of their post or the unit they lead;
- Managers are expected to convey to employees any and all information that is important for their performance – in terms of understanding their duties and tasks, changes in the manner of work or changes in the organization, and giving feedback on the quality and results of the work performed;
- It is vital that the teams communicate, because it is in everyone's best interest that all units cooperate effectively and professionally;
- Internal communication implies a mutual relationship of respect and appreciation whereby applying the Group ethical standards;
- Any relationship with another employee should have the character of a partnership with company success as the common goal.

All joint meetings should be scheduled in a timely manner (at the latest one day in advance). Everyone needs to show up on time. The meeting takeaways must be sent in a written electronic form. Any meeting takeaways that include tasks are forwarded to all employees delegated for execution thereof, even if they were not in the respective meeting. The tasks must be specified, which means that they must clearly state – who does what, and within which deadline.

All information of greater importance; that represent goals or tasks for employees within the company; refer to meeting takeaways, projects, plans, reports, etc. should be drafted in writing. Internal communication is done electronically (email) and in writing (letters), by using the latter to forward information that must be documented and accompanied by the sender's signature. If the work is carried out with the participation of several employees, it is necessary for them to forward all relevant information to each other. Information and plans related to the projects of one team/sector are regularly exchanged at meetings that are held periodically (weekly, fortnightly, monthly) - depending on the needs of the job and the specifics of each sector.

All team members that work on the same task have the right and obligation to express their opinion if they do not agree with any elements and to provide a rationale thereof.

It is preferable to respond to a call or email sent by a colleague within 24 hours. Failure to respond to a call or email sent by a colleague within a reasonable time will be considered a violation of this Code. If an employee is away from the office for more than one business day, they should leave an automatic email reply with a standard form, that shall be activated via the client email standardly used at PIN.

2.3. EXTERNAL COMMUNICATION

Each employee is a representative of PIN's business and professionalism. Therefore, in their external communication, all employees are expected to act:

- Professionally;
- In accordance with business etiquette;
- With respect towards business partners/clients/beneficiaries.

As in internal written communication, if the information forwarded externally is official, it should be made in the form of a letter and forwarded as such, while less formal communication may be done electronically.

3. The procedure for implementing the rules of the Code

3.1. SPECIAL RULES OF CONDUCT IN RELATION TO DONORS

In its work, PIN relies on the support of numerous partners in the form of various foundations, as well as international and local organizations, with whom and with whose support PIN undertakes activities on numerous projects.

PIN pays special attention to cooperation with its donors and aligns its actions with their recommendations and instructions.

PIN undertakes, in accordance with the recommendations of the international organizations with which it cooperates, to undertake, inter alia, a series of activities in the form of designing a program document/action plans for program activities and managing related risks, with an emphasis on the prevention of sexual exploitation and abuse.

PIN accepts ST/SGB/2003/13 as its standards, and will implement them without exception, in accordance with this Code.

PIN will take all reasonable efforts to train employees in order to actively raise awareness and provide support for the establishment of policies and the implementation of protection and prevention procedures in relation to human rights violations and abuse.

PIN will conduct trainings together with international partners with whom it cooperates for the purpose of improving the prevention and fight against sexual exploitation and abuse, as well as the protection of human rights in their entirety. The trainings are mandatory for all employees, and they shall, in particular, contain clarification of the definition of sexual exploitation and abuse, clarification of behavior that is prohibited, the procedure for reporting any observed behavior that can be qualified as sexual exploitation and abuse.

PIN will pay particular attention to the allegations of international organizations they cooperate with as to potential cases of behavior that violate their basic values, with an emphasis on respect for human rights and the fight against sexual exploitation and abuse.

In the event of a credible allegation against persons employed with PIN, partner, other associate or related staff who implement programs supported by the Donor, PIN undertakes to:

- Ensures that appropriate actions are taken in the form of termination of employee contracts and/or criminal referral, if necessary and applicable;
- Share information about such allegations with relevant authorities, as appropriate, based on a risk protection assessment, and as per the informed consent;
- Refer victims directly to safe and confidential victim assistance, legal assistance included, where available, based on their needs and consent.

3.2. SPECIAL RULES OF CONDUCT IN RELATION TO BENEFICIARIES

Full, i.e. the indivisible authority and competence of psychologists applies in professional work with both individuals and small groups. Within these frameworks, the psychologists shall strive to apply their professional knowledge and experience for the benefit of the beneficiary, while respecting their dignity. One of the basic duties of a psychologist is to prevent negative consequences for the beneficiary, to always be available to the beneficiary, to be transparent in their work with the beneficiary, and to treat the data obtained from the beneficiary as confidential.

Each psychologist is aware that in their relationship with the beneficiary there is a difference in power (psychological, institutional, etc.), and therefore they are obliged to take care to prevent abuse thereof.

Each psychologist is obliged to avoid mixing professional with other types of relationships.

Each psychologist enters into a professional relationship with a beneficiary on the basis of a valid consent.

The information that the psychologist obtains while working with the client/beneficiary is of a confidential nature and keeping it secret is one of their basic duties. In addition to the above, each psychologist is obliged to inform the client about the confidentiality of data and findings obtained during the professional relationship. Likewise, they are obliged to inform the client of their duty to protect the confidentiality of data and findings.

When using the data collected during work with the client/beneficiary, each psychologist is obliged to hide the identity of the client and other persons to whom the data refer, and to take all reasonable steps to prevent the disclosure of such identities to unauthorized persons or the public.

Each psychologist undertakes not to reveal the identity of the client even if the client does not request the protection of their identity. Each psychologist is obliged to take all necessary steps in order to preserve the confidentiality of data and findings, i.e. to prevent access to those data and findings by unauthorized persons.

Presentation of psychological data, findings and opinions about a client with a known identity is allowed only in permitted circumstances, in accordance with the consent signed by the beneficiary.

In case of coercion or threat to disclose confidential data and findings, each psychologist is obliged to take appropriate steps, within the limits of justified concern for their livelihood, including notifying PIN or other competent services that could help in safeguarding the confidentiality of data and findings.

In their practice, psychologists must not use procedures, devices or programs that, even as a side effect, lead to disrespect for the dignity of beneficiaries and others to whom those procedures, devices or programs are applied.

The psychologists shall observe professional standards and the provisions of this Code; they shall not be bound by the orders of any other authorities (individuals or institutions) if they conflict with the profession and this Code.

PIN continuously monitors its employees and pays particular attention to ensure that none of the employees violates human rights of other persons, primarily in their workplaces.

If a psychologist observes that one of the beneficiaries is a victim of misconduct, sexual abuse or exploitation, they must report it without delay, no later than within 24 hours from the moment of learning thereof, in accordance with the procedure set forth in Article 3.4. of this Code. Upon filing a report in accordance with this provision, the Ethics Committee is obliged to immediately notify all relevant authorities thereof, and to, within an additional period of 24 hours at the latest, notify at least the legal representative of the vulnerable person, or the guardian if there is one/if he/she is known, the competent police authorities, and the competent authority of the institution where the beneficiary is placed, medical team in the accommodation facility, as well as the center for social work. In regard to this procedure, a psychologist is obliged to ensure that the beneficiary's personal data, which they report to the competent authorities in accordance with this provision, are disclosed only to a minimum extent, and only to those persons to whom they must be disclosed for the purposes of efficient and effective prevention of continuation of abuse and sexual exploitation. The psychologists are particularly obliged to pay special attention to the beneficiaries who have the status of children, i.e., who are minors. The psychologists are

obliged to ensure that the report is made in accordance with the law, and upon obtaining prior consent from the beneficiary.

3.3. SPECIAL RULES OF CONDUCT IN RELATION TO EXTERNAL ASSOCIATES, SUPPLIERS AND OTHER EXTERNAL ASSOCIATES

PIN members, its managers and employees will take all necessary actions to ensure that PIN does not associate or cooperate with legal/physical persons who engage in or are associated with sexual exploitation and abuse, and they shall demand that all these persons, especially PIN suppliers, are bound by special contracts so as to adopt the rules related to the prohibition of sexual exploitation and abuse, which prescribe both preventive and repressive measures related to such behavior, in accordance with the high standards established by this Code. If it is established that an associate, partner, or supplier is engaging in or is otherwise connected (e.g. their passive actions enable illegal actions), PIN is obliged to terminate any further cooperation with such legal/natural person without delay. PIN is obliged to provide this condition as a cause for termination with immediate effect – without observing the applicable notice period in contracts for the provision of services, business and technical cooperation etc. - except in the case of employment relationships, when the procedure for employment termination will be carried out in accordance with the Labor Law.

3.4. REPORTING VIOLATIONS OF THIS CODE AND PROCEDURE IN CASE OF VIOLATION OF THIS CODE

3.4.1. General provisions

If the employees become aware of Code violations, if they have any questions or need assistance in understanding or interpreting any provision of this Code, they may contact the competent person. Managers have additional responsibilities, not only to monitor and enforce the implementation of the Code, but also to set a personal example. Managers are required to help employees understand the Code and to encourage them to seek help as to any questions or dilemmas they may have regarding the application of this Code.

3.4.2. Duties of employees in case of Code violation

In the event of Code violation, the employees shall have the following obligations:

- The employees must report any violation of the Code to the competent person. Any individual who makes such a report in good faith will not suffer negative consequences, i.e., they will be protected therefrom.
- The employees must cooperate with duly authorized audits and investigations. Any individual who cooperates in good faith with an audit or investigation will not suffer negative consequences, i.e., they will be protected therefrom.
- Retaliatory acts against individuals who have reported violations of the Code or who have cooperated in audits or investigations, represent a violation of the obligation of PIN employees to observe the highest standards of efficiency and integrity, as well as to perform their functions and govern their behavior in the PIN's best interest.

PIN guarantees full protection of the identity and integrity of a person who in good faith reports any violation of this Code or a suspicion of such violation, or any other illegal or unethical conduct.

PIN guarantees protection against retaliation against any Employee. In order to get protection, a report thereof must be prepared as soon as possible, and no later than 7 days after the individual becomes aware of the Code violation. The individual must make such report in good faith, and they must provide information or evidence that supports a reasonable belief that misconduct has occurred; they must cooperate in good faith with a duly authorized investigation or audit. This Code shall not prejudice the legitimate application of regulations, rules and administrative procedures, including those governing performance evaluation, non-extension or termination of employment, etc. However, the burden of obtaining evidence rests with the immediate superior and PIN, who will prove with clear and convincing evidence that they would have taken the same action if none of the acts mentioned in the previous article had been taken, i.e. the alleged retaliation had not been taken for the purpose of punishing, intimidating or injuring a person who engaged in a protected activity. Communicating or spreading unsubstantiated rumors is not a protected activity. Submitting a report or providing intentionally false or misleading information represents misconduct, and constitutes a breach of employment obligation that may be cause for disciplinary action and termination of employment.

Failure to report a violation of the Code shall also be deemed Code violation, whereas a person who did not report or has covered up violation of the Code by another person will be liable in the same way as a person who actively violated the Code.

No employees of PIN, regardless of the hierarchical level of their position, have the authority or right to force or induce an employee to do anything that is illegal and/or unethical. If an employee feels under pressure to do the opposite or feels any discomfort in this regard, they must inform the Person responsible for the implementation of the Code thereof.

3.4.3. Misconduct reporting mechanisms

3.4.3.1. Reporting misconduct via established internal mechanisms

The PIN bodies responsible for implementing the provisions of the Code and handling complaints regarding its violation are **the Person responsible for the implementation of the Code and the Ethics Committee**.

The Person responsible for the implementation of the Code is appointed by the PIN President, and they shall have a 2-year term as of the date of appointment. This body is independent and autonomous in its work. The Person responsible for the implementation of the Code is obliged to organize awareness-raising activities as to the values protected by the Code, to ensure its observance, receive and submit reports related to non-compliance with the Code, collect information related to the facts relevant for determining the validity of reports, to prepare reports for the Ethics Committee, and to prepare the annual report for PIN Assembly.

The Ethics Committee is a collective body consisting of three PIN employees appointed by the PIN President with a 3-year term as of the date of appointment. The Ethics Committee has a chairperson elected by the members of the Ethics Committee. This body is independent and autonomous in its work. This body shall lead the procedures for determining violations of the Code, and make decisions, recommendations, etc. thereupon, in accordance with the provisions of this Code.

Reports/complaints about any violations of this Code shall be submitted via the established internal communication mechanisms to the Person responsible for the implementation of the Code, in writing, by submitting the report/complaint form provided by PIN (by personal delivery, delivery by mail to PIN headquarters or by email psea@pin.org.rs), or as a transcript of an oral statement; they must contain a rationale, and appropriate written evidence, if possible. The PIN's duty is to protect the confidentiality of the individual's identity and all communication via those channels to the maximum extent possible.

The person responsible for the implementation of the Code is obliged to, at all times, obtain prior informed and voluntary consent, to act in the best interests of the child, to always consider potential risks towards victims (and their families), and to take safety precautions.

The person responsible for the implementation of the Code is obliged to keep a record of the referral, as well as a record of the services provided to the victim.

If the report/complaint is not duly submitted, the person responsible for the implementation of the Code will contact the applicant directly, and complete the report/complaint with additional information obtained from the party submitting it. The person responsible for the implementation of the Code will submit the duly submitted report/complaint to the Ethics Committee for examination within 24 hours of receiving the report/complaint. In addition to the report/complaint, the person responsible for the implementation of the procedure will also submit all additional information that may be needed in order for the Ethics Committee to act and make the right decision. Upon receiving a report/complaint that contains elements of a criminal and/or misdemeanor offense, the Ethics Committee is obliged to inform the competent public prosecutor's office, as well as all possible stakeholders in the field thereof (no later than within 24 hours from the submission of the report/complaint by the person responsible for the implementation of the Code), and to internally carry out the procedure in accordance with this Code, which may not last longer than 15 days.

During the procedure conducted before the Ethics Committee, the person responsible for the implementation of the Code will act as a rapporteur, meaning that they will present relevant facts, call witnesses, present written evidence, and provide clarifications related to the rules set forth by the Code.

The Ethics Committee is authorized to request additional investigative actions, hearings of relevant individuals, and to hire experts if necessary, within the time limit set as the procedure duration by the Code. The Ethics Committee is obliged to report all persons who failed to respond to the invitation of the Ethics Committee to provide relevant information, to inform their immediate superiors and other relevant stakeholders.

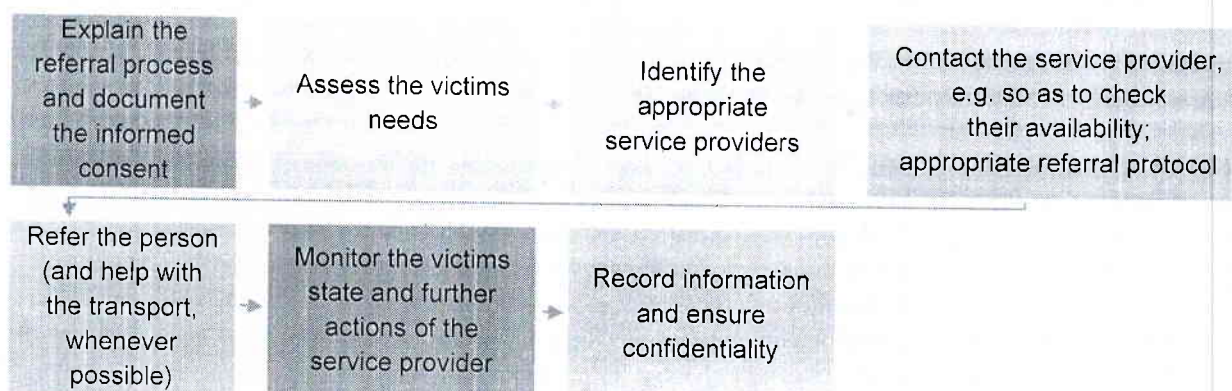
The Ethics Committee renders their decisions in writing. They are obliged to provide a rationale for their decision, as well as to submit it to the President of the Association for proceeding, and to all participants, and their immediate superiors. If there are elements of a criminal and/or misdemeanor offense, especially regarding sexual exploitation and abuse, the PIN President will deliver the decision to other relevant stakeholders, primarily to the public prosecutor.

The President of the Association is obliged to act in accordance with the decision of the Ethics Committee. The decisions of the Ethics Committee may contain a recommendation for termination of cooperation, i.e. employment termination, recommendation to cooperate with the state administration bodies governing security, recommendation for taking disciplinary measures – a fine or temporary removal from work, etc. The recommendations of the Ethics Committee are binding.

The decisions of the Ethics Committee shall, in particular, contain recommendations, notifications and information provided to victims of sexual exploitation and abuse as to their rights, appropriate support systems in overcoming the consequences of such exploitation, i.e. abuse, whereas they are obliged to take into account their specific needs.

The Ethics Committee is obliged to develop a referral system and ensure referral to support the victims of sexual exploitation and abuse no later than 30 days from the date of appointment.

An overview of the referral process key steps is presented in the chart below:



The referral procedure and system shall be perceived with a certain level of flexibility, with the aim of adapting the procedure to the needs of the victim.

In terms of the above, referral especially includes the provision of logistical and other support during the referral of the PIN beneficiary to other organizations and/or institutions, in order to create the necessary conditions for that organization and/or institution to effectively and timely implement further interventions for the purpose of supporting the victim. In case of abuse, the Ethics Committee will refer the victim to the local center for social work, the police, and, if necessary, to the appropriate health institution. Referrals are made in written standardized form („Referral form“), whereas making a note thereof for the case file.

The Ethics Committee, or the PIN employee appointed by the Ethics Committee by a special decision is obliged to create and regularly update the list of organizations and professionals to whom the referrals are made.

The person responsible for the implementation of the Code and the Ethics Committee are obliged to treat each report seriously and with confidentiality. The confidentiality obligation, inter alia, specifically refers to the confidentiality of identifiable data about children and vulnerable adults, whose data is shared both within the organization and with other referring organizations/institutions solely on a need-to-know basis.

The person responsible for the implementation of the Code and the Ethics Committee are obliged to respect the principle of ensuring the safety and best interests of the child and/or vulnerable adult, which will always be a priority. It is the special duty of the Ethics Committee to consider all potential risks towards victims (and their families) and report the Person responsible for the implementation of the Code thereof.

3.4.3.2. Reporting misconduct via external mechanisms

An individual may report a violation of this Code to a person outside the established internal mechanisms, i.e.: to the police and/or the public prosecutor's office, provided that:

1. Filing such report is necessary to avoid:
 - A significant threat to public health and safety; or
 - substantial damage to the work of the Organization; or
 - violation of national or international law;
2. The use of internal mechanisms is not possible due to the following:
 - At the time of preparing the report, the individual has reason to believe that he/she will be subjected to retaliation by the person(s) to whom he/she is to file the report pursuant to an established internal mechanism; or
 - It is likely that evidence relating to misconduct will be concealed or destroyed if the individual reports to the person(s) to whom he/she is to file the report in accordance with established internal mechanisms; or
 - The individual has previously reported the same information through established internal mechanisms, and the Organization has not failed to notify him in writing of the case status within six months of such report.
3. The individual does not accept payment or any other benefit from any party for such report.


3.4.3.3. Reporting retaliation to the Ethics Committee

The individuals who believe they had been victims of retaliation due to the fact that they reported violation of the law or cooperated with a duly authorized audit or investigation may submit a request for protection from retaliation to the Ethics Committee in person, via regular mail, or by email. It is essential to forward all information and documentation available to support their request to the Ethics Committee as soon as possible.

The requests for protection from retaliation must be submitted to the Ethics Committee no later than six months after the date on which the individual knew or, in the opinion of the Ethics Committee, should have known, of the retaliatory act.

4. Final provisions

The Association "Psychosocial Innovation Network" [Mreža psihosocijalnih inovacija] hereby adopts this Code, in accordance with its founding and other internal documents. It shall enter into force on the eighth day from the day of publication on the notice board.


President of the Association
Masa Vukčević
Masa Vukčević Marković

