



NEW DAWN

БО БФ РАНОК ВІДРОДЖЕННЯ

CODE OF CONDUCT

<i>Version</i>	<i>Name</i>	<i>Prepared</i>
<i>V 4.0</i>	<i>CODE OF CONDUCT</i>	<i>March 2025</i>

1. General Principles and Values

New Dawn was established to help Ukrainians affected by the invasion of February 2022. To achieve this goal, we provide emergency assistance, address psychosocial issues, and support healthcare, among other activities. The success of our work largely depends on the continued goodwill of international and local partners. This means that as an organization and as individual members of CF "New Dawn" we must act with complete honesty and transparency. Any other behavior undermines trust in us and the entire humanitarian sector in Ukraine, ultimately harming those we aim to assist.

New Dawn adheres to humanitarian principles such as humanity, neutrality, independence, and impartiality.

According to our internal policies, discrimination on any grounds is strictly prohibited, including racial, gender, age, religious, or other forms of discrimination.

New Dawn affirms its inclusivity toward people with disabilities and takes reasonable measures to prevent any form of discrimination. We are committed to addressing all complaints and reports of possible discrimination seriously and objectively. All members of the organization, including staff and volunteers, must refrain from any actions or comments that could contribute to discrimination.

We strive to create an environment where all our employees, volunteers, and beneficiaries respect one another and share a sense of mutual value.

2. Monitoring and Addressing Violations



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Our organization is committed to promptly responding to all cases of possible discrimination and other violations under our Code of Conduct.

- 2.1. All employees and volunteers are obliged to report possible violations of the Code of Conduct to the management or the designated contact person in the organization.
 - 2.2. The organization conducts thorough investigations into every case of Code of Conduct violation and takes appropriate measures to address the violations, including sanctions if necessary.
 - 2.3. We aim to provide support and protection to victims of discrimination or other violations and to create a safe atmosphere for employees and volunteers to report violations freely.
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3. Confidentiality and Data Protection

- 3.1. Our humanitarian organization believes in the importance of protecting personal information and adhering to confidentiality principles in all aspects of our work.
 - 3.2. We are committed to complying with all applicable laws and international standards regarding the collection, storage, and processing of personal data.
 - 3.3. The organization undertakes to collect only the personal information necessary to achieve our humanitarian goals.
 - 3.4. Personal data must be stored securely and protected from unauthorized access.
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4. Use of Information

- 4.1. Personal information is collected and processed exclusively for defined humanitarian purposes and cannot be used for other actions without the consent of the individuals providing the data.
 - 4.2. All employees and volunteers must adhere to confidentiality and not disclose personal information without the consent of the data owner.
 - 4.3. Personal information may not be transferred to third parties without the consent of the data owner or without legal grounds.
 - 4.4. The transfer of personal data to third parties must comply with legal requirements and international standards.
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5. Training and Awareness

- 5.1. The organization aims to ensure that all employees and volunteers understand the principles of the Code of Conduct, humanitarian standards, and data protection.
- 5.2. Regular training sessions are held for new members of the organization on ethical principles and reporting procedures.
- 5.3. Monthly meetings are conducted to discuss ethical issues and analyze practical cases.
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6. Relationships with Donors

6.1. Partnership and Collaboration

- 6.1.1. We view donors as equal partners in our shared mission to achieve humanitarian goals.
- 6.1.2. Communication between the organization and donors is based on mutual courtesy, transparency, a constructive approach, and timely information sharing.
- 6.1.3. We respect the policies and procedures of our donors and expect our partners to equally acknowledge the principles and policies of our organization.

6.2. Ethics of Interaction

- 6.2.1. Ensuring respect for the cultural, ethical, and legal norms of each party.
- 6.2.2. All communications between the organization and donors must be transparent, ethical, and focused on achieving shared goals.
- 6.2.3. In case of misunderstandings or conflicts, they are to be resolved through dialogue based on the principles of partnership and mutual respect.

6.3. Joint Development

- 6.3.1. The organization regularly shares experiences, ideas, and best practices with donors to enhance the effectiveness of joint projects.
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6.3.2. We support initiatives to develop innovative approaches in the humanitarian sector through dialogue, joint activities, and projects.

6.3.3. To strengthen partnerships, we encourage donors to participate in the planning, implementation, and evaluation of projects.

7. Mechanisms for Reporting and Accountability

7.1. Reporting Possible Violations of the Code of Conduct

- All employees, volunteers, beneficiaries, and other participants of the organization have the right to report possible violations of the Code of Conduct.
- Reports may involve various aspects of violations, including discrimination, misconduct, breaches of confidentiality, or other issues.

7.2. Reporting Procedures

- For convenience and confidentiality, a special mechanism has been created for reporting and accountability.
- Reports can be submitted in writing, orally, or via email and must be sent to the Executive Director.

7.3. Investigation and Review of Reports

- Reports will be thoroughly investigated and reviewed by qualified specialists or the internal compliance control service.
- All reports will be treated objectively and confidentially, and complainants will be informed about further actions and outcomes.

7.4. Protection from Retaliation

- No one who submits a report on violations of the Code of Conduct should face retaliation or negative consequences for their actions.
- The organization is committed to ensuring the rights and confidentiality of individuals who report violations.

7.5. Measures for Correcting Violations



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- In the event of identified violations of the Code of Conduct, appropriate measures will be taken to rectify them and prevent similar occurrences in the future.
- Measures may include disciplinary actions, training, research activities, and other necessary actions.

8. Communication

8.1. Dissemination of the Code of Conduct

- The organization is committed to ensuring access to the Code of Conduct for all members and facilitating their familiarity with it.
- The Code of Conduct must be available on the organization's website, in printed form in the main office, and other key premises.

8.2. Reports and Information

- The organization is committed to regularly informing its members about any changes to the Code of Conduct or other important operational aspects.
- Regular reports on adherence to the Code of Conduct and ethical standards must be accessible to all members of the organization.

8.3. Open Dialogue

- The organization promotes open dialogue and the exchange of ideas among its members regarding the Code of Conduct and ethical issues.
- All proposals and complaints related to the Code of Conduct must be thoroughly reviewed and addressed.

8.4. Training and Education

- The organization ensures training and education regarding the Code of Conduct for all new members and conducts regular updates for existing members.
- The organization fosters awareness and understanding of ethical issues that arise during its operations.

8.5. Liability for Violations



The organization establishes procedures and mechanisms for addressing violations of the Code of Conduct and imposing appropriate sanctions.

9. Adherence and Consequences of Violating the Code of Conduct

Violations of the Code of Conduct may result in disciplinary actions in accordance with the organization's internal rules and procedures.

9.1. Registration of Code of Conduct Violations

The **Code of Conduct Violations Register** is used to document cases of non-compliance with the organization's internal rules. It helps maintain discipline, analyze violations, and take appropriate actions.

The register is maintained in the **Code of Conduct Violations Journal**, where the following details are recorded:

- Date of violation
- Full name of the violator
- Department
- Description of the violation
- Category of the violation
- Sanctions applied
- Responsible person for review

The register is **confidential** and accessible only to authorized personnel.

9.2. Violation Registration Procedure

9.2.1. Identification of a Violation

The incident is recorded by the immediate supervisor or a security officer. Evidence is collected (testimonies, video recordings, documents).

Registration in the Register

- The responsible person (HR, security service, or legal officer) enters the data into the register.



- The category of the violation is determined (**minor, serious, critical**).
- A responsible person for reviewing the incident is assigned.

Review and Decision-Making

- An internal investigation is initiated if necessary.
- A decision is made regarding sanctions (**warning, fine, dismissal, etc.**).
- The violation status is changed to "**Closed**" once a decision is finalized.

9.3. Categories of Violations and Sanctions

9.3.1. Minor Violations

1. Use of company equipment for personal purposes
2. Unjustified tardiness
3. Failure to perform job duties

Sanctions: Verbal warning, written reprimand

9.3.2. Serious Violations

1. Disclosure of confidential information
2. Conflict of interest
3. Non-compliance with safety regulations

Sanctions: Written reprimand, fine, temporary suspension

9.3.3. Critical Violations

1. Corruption, bribery
2. Document falsification
3. Physical or psychological abuse, or sexual exploitation

Sanctions: Dismissal, referral to law enforcement authorities

9.4. Control and Audit of the Register

1. **Quarterly analysis** to identify repeat violations.
2. **Generation of reports** for management and ethics committees.
3. **Implementation of preventive measures** to minimize violations.

Conclusion



The **Code of Conduct Violations Register** helps maintain discipline within the organization, enables a prompt response to incidents, and upholds corporate ethics.

10. Our Commitments

We commit to working at the highest level:

- Respecting the laws of Ukraine.
- Effectively and rationally using the resources entrusted to us.
- Maintaining transparency in our activities and financial management.
- Avoiding any conflicts of interest or corruption.
- Preventing sexual harassment, exploitation, human trafficking, or bullying.
- Acting professionally and personally in a way that positively impacts the organization.

11. Requirements for Volunteers and Employees

General Principles

Our charitable organization strives to achieve the highest standards of integrity, conscientiousness, and professionalism in all its activities.

Volunteers and employees are the face of our organization and are required to conduct themselves as representatives of a dignified and responsible organization.

Professionalism and Commitment

- All employees and volunteers must prioritize quality and results in their work, striving for continuous improvement.
- We are committed to adhering to all internal rules and procedures of the organization, as well as to the humanitarian principles and goals.

Respectful and Cultural Conduct



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- We respect all our colleagues, volunteers, beneficiaries, and other participants in our activities, regardless of their race, religion, nationality, age, gender identity, sexual orientation, or other characteristics.
- We are committed to creating an atmosphere of mutual respect and tolerance in the workplace.

Dress Code and Use of Branded Materials

- Employees and volunteers must adhere to an appropriate dress code that aligns with the professional environment and the organization's standards.
- During missions, employees and volunteers are required to use clothing and other items with the organization's logo for identification and to ensure transparency in activities.

12. Internal Policies

New Dawn has developed and disseminated among its team the following internal policies and guidelines:

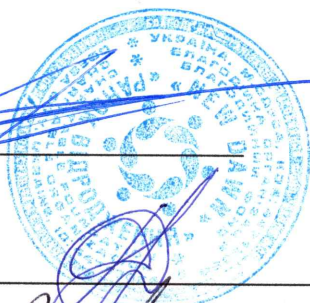
- Financial Policies and Procedures.
- Policy on Preventing Sexual Exploitation and Abuse.
- Declaration of Humanitarian Principles.
- Anti-Corruption and Whistleblowing Policy.
- Procurement Manual.

Approved and signed

Julia Pogrebna

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