

## **Code of Conduct and Ethics**

The Code of Conduct and Ethics applies to all senior management and executive officers of “ODYSSEY AMKE” (Organization), employees with any employment relationship as well as any third party cooperating with the Organization, in the provision of services or project implementation, including intermediaries, providers and any other person (natural or legal), who cooperates with the Organization in the framework of outsourcing or other agreement, to volunteers, trainees, as well as members of Committees (collectively "staff" or "employees").

The employees of the Organization must demonstrate responsible and ethical behavior and adhere consistently to the spirit and purpose of this Code

### **Basic ethical values and principles**

The progress of the staff and the provision of high-quality services remain a priority of the organization.

The Organization aims more at group collaboration rather than individual work. Without limiting the independence of employees and defining roles and responsibilities, the organization promotes team spirit in its activities and seeks the exchange of views and knowledge as well as the use of different approaches to achieve common goals.

All relationships are governed by transparency, as part of its efforts to provide accurate, fair, timely, regular, reliable and accessible information. The Organization aspires to maintain a high level of social responsibility, respecting and promoting human values, as well as high social, spiritual and cultural values. The Organization also applies professional practices that are characterized by high ethical standards and ensure that its relationship with third parties is governed by respect, honesty, integrity, reliability, honesty, consistency, equal treatment, objectivity and impartiality. Staff development and the provision of high quality services remain a priority for the Organization.

All staff shall comply with the policies guiding the Organization's

activities and management. Relevant training, support and resources shall be provided to all staff in order to fulfil the Organization's mission responsibly and effectively.

All staff shall attend Organization training courses as a matter of course. Staff shall respect the rules of procedure. They have clear job duties and performance standards, know to whom they report and what management support they will receive. All staff must comply with the Organization's rules. Coordination and cooperation among staff is essential. These procedures facilitate everyone's work and ensure the smooth running of the Organization. Bullying and harassment have no place in our culture and principles, and our equal opportunities policy requires each staff member to protect colleagues from all harassment.

## **POLICY OF GRIEVANCES**

Individuals who supervise other employees have additional responsibilities under the Code.

They must:

- Be an example of ethical behavior through their own behavior and the way they supervise the work of others.
- Ensure that self-supervised individuals have sufficient knowledge and resources to comply with the Code.
- Monitor compliance with the Code by the people they supervise.
- Apply the Code fairly and consistently.
- Support employees who, in good faith, ask questions or concerns. Employees often come to their supervisors to report a suspicious misconduct and it is important that they feel comfortable doing so.

If an employee reports a potential breach to you, you have a responsibility to ensure that there will be no retaliation, and this may require monitoring the situation.

## **Conflict of Interests**

A conflict of interest occurs when your personal interests or your degree of legitimacy conflict with the interests of the Organization. A conflict situation can make it difficult for you to perform your tasks impartially.

For example, conflicts may involve situations where you have a vested interest, a stake / shares, or an employment or partnership relationship, such as a supplier. Conflicts of interest also occur when your spouse or partner, your children, your parents, your siblings (by blood or by marriage) or another close family member are either a competitor, supplier or partner of the Organization or have been hired by one of them.

As an employee, project manager or associate of the Organization, you should be able to identify and report any real or potential conflicts between your personal interests and the interests of the Organization to your Manager, as appropriate.

In particular, it is considered that there is a conflict of interest when a person involved in the process (e.g., independent experts, members of the selection committee, staff participating in the project eligibility evaluation) has direct or indirect interests that are or appear to be incompatible with the impartial and / or objective exercise of their duties in the selection process.

Such a conflict of interest may arise primarily on the basis of financial interests, political or national proximity, family or emotional ties or any other related common interests that may affect the impartial and objective nature of the selection process. Depending on the type of relationship and the consequent potential conflict, the person involved may be right to abstain from the selection, the voting or even the wider discussions or evaluation of an individual issue.

## **Anti-Fraud Policy**

All reports regarding breaches of the Code of Conduct will be duly investigated and treated with the utmost confidentiality. The Organization reserves the right to determine the manner and extent to which any examination / investigation will be conducted.

It is the duty of everyone involved to communicate honestly and to cooperate fully in the investigations and audits of the organization. Investigations often involve complex legal issues, and your own actions can jeopardize the integrity of an investigation and damage the organization.

Under applicable law, employees who violate this Code, other policies of the Organization or the law may be subject to disciplinary measures, reaching up to the termination of the contract.

### **Bribe**

A bribe is an offer, promise, concession, application for or acceptance of a privilege in exchange for an action that is considered illegal or abusive.

All the staff of the organization are responsible for the prevention, deterrence and reporting of such cases. As part of the effort to protect the reputation of the organization, every employee must:

- Not offer or promise any financial or other benefit to any individual, government officials, civil servants or anyone else, in order to entice and reward, act in breach or reward for any illegal act/activity.

- Not accept gifts in the form of cash (regardless of amount) or goods (tips, accommodation, significant discounts on purchases of goods or other). The prohibition does not concern promotional gifts of low value, symbolic gifts for Christmas, Easter, anniversaries or name day, which are traditionally considered socially acceptable.

- Not seek to secure any kind of benefit or advantage by exploiting the acquired skills and any privileged position as an employee of the organization inside or outside it.

The prohibition on bribery applies to employees, as well as associates, volunteers and suppliers, who have been entrusted with activities under an agreement.

As a humanitarian, non-profit organization, it makes no payments



or contributions to any political party, candidate for government office or campaign. In addition, care must be taken not to engage in advocacy activities without proper guidance and approval. Before meeting or communicating with civil servants or officials to influence legislation or other government proceedings, the staff should contact the organization's Management for guidance.

The Organization has established a general code of conduct on procurement procedures, although specific procurement rules and procedures followed in the implementation of a programme may in practice change depending on the circumstances and specific conditions.

The Organization does not maintain a list of favored suppliers, as it aims at transparency and seeks to ensure the best quality and price. Consequently, the goods and services procured must be of satisfactory quality and in line with the budget of the programme concerned. Procurement procedures will take into account the social objectives of the Organization.

When participating in the strategic decisions of the Organization, your decisions must be based on an objective and impartial judgment. Accepting gifts or other benefits from applicants, suppliers or other partners can affect your judgment. For this reason, gifts, meals and entertainment are only permitted if they are part of a commonly accepted professional context (for name day, Christmas, Easter or other occasions, which are traditionally and socially acceptable and offered within the framework of social communication), have only a small value are given and received with the explicit or implicit understanding that you are not in any way obliged to accept the gift. Gifts in cash are prohibited and must be returned.

As a non-profit humanitarian organization, it strongly discourages its employees from offering gifts or entertainment to others. In case of unexpected situations, when you provide a gift, benefits of any kind or related to the activities of the organization, you must not offer or provide any gift that exceeds the value of 150 euros. There are strict regulations governing the provision of gifts, meals or other valuables to government officials. Do not offer any valuables to government officials or their employees or family members without the prior written approval of the organization's Manager.

## **Anti-fraud**

The Organization attaches paramount importance to the confrontation and fight against incidents of fraud, as well as any other irregular action and auditing-practice incompatible with the international practice and the existing provisions. These actions are contrary to the fundamental values and principles that govern the conduct of the Organization and lead or could lead to undesirable consequences, with a serious impact on the reputation of the Organization as well as on the interests and trust of financiers and donors. Fraud could also affect the efficiency and effectiveness of the Organization's staff and associates, their motivation and ethos and have an impact on attracting and retaining healthy and appreciable human resources.

With this Policy and taking into account the zero tolerance of the Organization in cases of fraud and corruption by the staff, associates, suppliers of the Organization and third parties with whom the Organization cooperates in any way, but also the obligations arising from the institutional, legal and regulatory framework, at national and international level, the Organization seeks to:

- Establish specific principles and rules for the prevention, deterrence and fight against fraud,
- raise the awareness and vigilance of the Organization's Staff and Associates, so that they are able to identify and avoid fraud-related actions,
- appropriate channels of actions to ensure the proper investigation of the reported incident,
- The development of systems, procedures and control mechanisms that assist in the prevention and suppression of fraud.

The Management of the Organization is responsible for the adoption and approval of this Policy, its periodic review, as well as the monitoring of its implementation. The Management of the Organization is also responsible for the proper implementation of this Policy, as well as for the training of Staff and Associates in matters related to fraud, in order to ensure their continuous awareness and vigilance.

## **Policy of complaints**

The Complaints Policy adheres to the following basic principles:

- The ability to submit and manage a complaint is free of charge
- all complainants enjoy equal treatment and an equal degree of protection of their interests,
- the complaints are investigated and dealt with in good faith,
- the complaints are dealt with effectively and separately, with respect for general and specific principles and values such as respect for personality, trust, transparency, decency, honesty, professional conscientiousness, the consideration of the legal interests of the person affected or likely to be affected, and the general willingness to cooperate.
- Personal data included in the complaints are processed in a legal, legitimate and safe manner

The main goal of the organization is to investigate and handle complaints in a way that leads to resolving the issue with transparency, impartiality, objectivity and within the specified time limits.

For the purposes of this Policy, a complaint may be filed by any natural or legal person who has a transaction, cooperation, contract, or any other benefit from the Organization, or any third party expressing his/her dissatisfaction regarding the services offered by the organization, its way of functioning, or the behavior of an individual staff-member or all its staff. Complaints should not be vague, but based on concrete facts, should always be made in good faith without the intention of blackmail, retaliation or of obtaining personal benefits.

Complaints are not submitted for acts, omissions or conduct that:

- are not related to the Organization
- are not related to the activities of third parties for which the

Organization bears no legal, moral or regulatory responsibility,

- constitute a manifestation of protest with exclusively abusive content

Anyone can file a complaint completely free of charge via e-mail. The Organization accepts the submission of complaints through this procedure only.

When filing a complaint, the complainant should provide his / her personal information, which will allow the Organization to contact him/her and to conduct his/her investigation regarding the reported act (name, contact details, father's name, Tax Identification Number).

The complainant should also accurately describe the issue and substantiate it with as much information and evidence as possible, facilitating further investigation.

### **Harassment policy**

### **Safety and Protection**

The Organization strongly condemns and will not tolerate any form of sexual harassment to and from any employee, consultant or any person, including, among others, supervisors, associates, visitors, or recipients of a concession or sponsorship.

In addition, the Organization strongly condemns and will not tolerate discrimination or harassment of any of its employees on the basis of race, color, religion, sex, sexual orientation, age, disability, marital status, ethnicity or other applicable law.

The Organization is committed to maintaining a work environment free of harassment and discrimination.

Any behavior that interferes with the performance of work, diminishes the dignity of any person or creates an intimidating, hostile or aggressive work environment will not be tolerated. This includes harassment of workers or other persons on the basis of race, sex, age, sexual orientation or any other protected category under applicable law. If you believe that you have been harassed or discriminated against in any way, report the incident

immediately to your Manager.

The Organization has adopted security and protection policies and protocols designed to protect and educate you on response measures, especially in the event of natural disasters. In this regard, it prepares response action plans for fire safety and crisis management purposes.

### **Sexual Exploitation**

Sexual exploitation and abuse by the staff of the organization is expressly prohibited. Every employee is expected to work without the effects of alcohol or other over-the-counter medications / psychoactive substances.

### **Information sharing, confidentiality and protection of personal data**

The Organization seeks to protect trusting relationships with jobseekers, recipients or sponsors, and employees, and to maintain a confidential framework in its planning and discussions.

The Organization maintains a balance between confidentiality and public information about its projects and activities. However, very often, sensitive information is usually an example of confidential information. "Confidential" is the information that comes to the perception of employees, either directly or indirectly, during their work. The Organization takes every measure to ensure the confidentiality of sensitive information and is committed to protecting confidential information and using it only for the purpose for which it was originally provided. All staff must maintain the confidentiality of the information provided to them by the organization, its beneficiaries and any other operational partner.

The organization relies on its staff to ensure the confidentiality of data, giving access to confidential data only after approval procedures and based on a proven need to provide this confidential information, without reproducing or discussing this information with any individual, who is not authorized or approved to know this information.

## **Intellectual Property**

The activities of the Organization can lead to the production of tangible intellectual property products, such as reports, documents, manuals, photographs, videos, documentaries, etc. The policy of the Organization is to ensure that all products created and copyrighted under its activities, benefit the public and the non-profit industry.

## **Promotion and communication policy**

We seek a clear and transparent visibility and communication policy in order to promote and achieve the objectives of the Organization. We also strive to inform the public through the Organization's website, press releases and printed material, as well as by organizing cultural events, talks and conferences on a variety of topics.

### **Guiding Principles**

The choice of images and messages will be based on the following fundamental principles:

- Respect for the dignity of those involved
- Faith in the equality of human beings
- Upholding fairness, solidarity and justice
- Compliance with applicable intellectual property and data protection legislation

Accordingly, throughout the entire range of communication is pursued by the Organization:

- To select images and related messages on the basis of fairness, solidarity and justice.
- To faithfully portray any image or situation, both in its immediate and wider context, in order to improve public perception of the objective reality and complexity of development.
- Avoid images and messages that might create patterns, impressions and prejudices against people, situations and regions.
- To make use of images, messages and specific cases with the full

knowledge, participation and permission of the individuals or their guardians.

- To conform to the highest standards in relation to human rights and the defense of the vulnerable.

### **Policy of Quality**

The aim is to develop a base for the improvement of the operations effectiveness of the Organization, always following the best interest of beneficiaries' needs and expectations, as much as possible.

The basic principles of the Organization are:

- Full transparency in all the phases while implementing humanitarian programs.
- Constructive collaboration.
- Ongoing updating and education of staff.
- Investigation on the causes for non-compliance or in case of complaints from beneficiaries, and further determination of corrective actions.
- Insurance of credibility and confidentiality of information - data which are produced, received and circulated in the framework of projects - actions that are implemented and managed.

All departments have the responsibility to respond, assimilate and implement the procedures required from the quality management system of the Organization through everyday activities:

1. Ensuring that its management and staff are fully trained to effectively carry out their work.
2. Constantly striving to meet, and where possible exceed, targets set in donor agreements.
3. Working closely with the Ministry of Migration and Asylum to understand their needs and design effective project actions.
4. Adopting a forward-looking view on future programmes to ensure the highest quality standards.

To meet the specific requirements, Odyssea applies a quality management system in conjunction with other management



controls, described in the Quality and Procedure Manuals.  
Responsibility for upholding this policy is an organisation-wide commitment under the guidance and with the assistance of senior management who encourage the personal commitment of all staff to have quality as a core element of skills and competencies.

It is Odyssea policy to make sure that this quality management system is constantly in place and that it preserves fully the ISO 9001:2015 standards by taking corrective measures and through an action list such as: training sessions, annual reviews, integration of ISO 9001:2015 to newly established departments and employees.

Odyssea complies with all applicable legislation and regulatory requirements relevant to its activity and seeks for continuous improvement of its management system.

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A handwritten signature in black ink, appearing to be "NTZEI", written over the printed name and company information.