



Code of Ethics

First issued on November 18th 2021



TABLE OF CONTENTS

PREAMBLE..... 3

1. GENERAL PRINCIPLES ERGA OMNES5

1.1. Addressees and Scope of the Code of Ethics..... 5

1.2. Ethical Principles 6

2. RULES OF CONDUCT8

2.1. Rules of Conduct with Third-Party Companies 8

2.2. Rules of Conduct with Suppliers 8

2.3. General Rules of Conduct13

2.4. Rules of Conduct with Employees 11

2.5. Rules of Conduct with Contractors, External Consultants, Partners, Third Parties 13

2.6. Rules of Conduct with Public Administration and Public institutions 15

2.7. Rules of Conduct with all other Counterparts..... 14

2.7.1. Relations with Judicial Authorities..... 14

2.7.2. Relations with Political Parties, Trade Unions and Associations 15

2.7.3. Contributions and Sponsorships..... 15

3. TRANSPARENCY OF ACCOUNTING AND INTERNAL CONTROLS 16

3.1. Accounting Records..... 16

3.2. Internal Controls 17

4. USE OF ASSETS AVAILABLE TO THE FOUNDATION.....17

5. HEALTH AND SAFETY 20

6. SUPERVISORS FOR THE IMPLEMENTATION OF THE CODE OF ETHICS..... 21

FORM A) - Declaration of responsibility and absence of conflicts of interest.....22

FORM B) - Declaration and termination clause to be included in contracts with third parties.....23



PREAMBLE

The Foundation of Religion and Cult called "Centesimus Annus - Pro Pontifice" was established with a Chirograph of His Holiness John Paul II on June 5, 1993, and was registered on November 26, 1993 in the registers of Vatican legal personalities (no. 7 of civil legal personalities and no. 18 of canonical legal personalities). It is registered with effect from September 20, 2019 in the Register of Non-Profit Organizations (no. 18). Therefore it must comply with Law CCXI of November 22, 2017 on the registration and supervision of this kind of entities. The Foundation has its legal seat in the Vatican City, Cortile San Damaso.

It is governed by the current Statute, approved by the Board of Directors on November 26, 2020 and subsequently updated through amendments by the Secretariat of State on March 22, 2021; as well as by the Code of Canon Law and Vatican legislation. The most recent modifications to the Statute were approved "Ad Experimentum" for five years by the Holy Father, as per the *Rescriptum "Ex Audientia SS.mi"* of June 16, 2021.

The Foundation may operate also in other countries, if necessary through local institutions, set up in accordance with local laws and regulations, provided that the conformity and respect for the cardinal principles of the Social Doctrine of the Church and, more generally, total adherence to the principles of the papal magisterium are declared in the act of constitution of these bodies.

. The Foundation recognizes the groups, established in the form of "Chapters" or autonomous entities, as suitable to the pursuance of its purposes by means of a Resolution passed by its Board of Directors, the Secretariat of State's placet having previously been secured.

As of 20.10.2021 the CAPP Foundation is present in 14 countries, 4 of which are outside Europe (Australia, Canada, Hong Kong and USA). The Foundation operates through 30 Chapters that are geographically distributed as follows:

N.	COUNTRY	CHAPTERS
1	Australia	CHAPTER (da nominare Referente)
2	Belgio (Bruxelles)	CHAPTER
3	Canada	CHAPTER (da nominare Referente)
4	Francia (Parigi)	CHAPTER
5	Germania	CHAPTER
6	Hong Kong	CHAPTER (da nominare A.E)
7	Italia	CHAPTERS = 16
		<i>Acireale</i>
		<i>Bergamo</i>
		<i>Bologna</i>



CODE OF ETHICS

CENTESIMUS ANNUS PRO PONTIFICE FOUNDATION

I^{ed} - 2021

		Crotone
		Foggia (San Severo)
		Messina
		Milano
		Padova
		Prato
		Reggio Calabria
		Roma
		Sardegna
		S. Miniato
		Torino
		Trento
		Treviso
8	Malta	CHAPTER
9	Olanda	CHAPTER (da nominare Referente)
10	Principato di Monaco	CHAPTER
11	Slovacchia (Bratislava)	CHAPTER (da nominare Referente)
12	Spagna	CHAPTERS = 2
		Barcellona
		Madrid
13	United Kingdom (Londra)	CHAPTER
14	USA	CHAPTER

The Foundation is a non-profit corporation with purposes of religion and charity.

Its specific goal is to help promote the study and dissemination of the social doctrine of the Catholic Church, as set out throughout the papal magisterium, starting, in recent era with “*Rerum Novarum*” and, in particular, but not only, with Saint John Paul II’s Encyclical “*Centesimus Annus*”, from which it takes its name.

According to **Art. 3** of its Statute, the Foundation pursues the following goals:

- a) *promotes informed knowledge of the social teachings of the Church and the activity of the Holy See among qualified and socially motivated business and professional leaders;*
- b) *promotes initiatives aimed at expanding the effective role of the Church in all sectors of contemporary society;*



c) promotes fund raising activities to help support the activity of the Apostolic See.

1. GENERAL PRINCIPLES ERGA OMNES.

1.1.

1.2. Addressees and Scope of the Code of Ethics

All those who join or work for FACPP (in any capacity) shall be bound to ethical and moral integrity of behavior, since such integrity characterizes the conduct of all those who are and will be part of its organization. Therefore the behavioral principles described in the Code for this Foundation shall apply to all persons as explained below in point 1.1.3.

1.1.1 Regulatory Scope

All persons to whom this Code of Ethics applies (1.1.3) shall abide by Vatican laws and regulations referred to in the Foundation's Organizational Model. They shall also abide by the regulations in force in their individual countries of citizenship, and the laws in force in the various countries in which they work in the interest or to the advantage of FCAPP.

1.1.2. Geographical Scope

Therefore the provisions of this Code of Ethics apply to the Foundation as well as to all its Vatican and foreign entities, even when they enjoy legal, accounting or organizational autonomy. More specifically, the Code of Ethics will apply to all individual (present and future) local chapters spread throughout the various continents, regardless of their local legal configuration.

1.1.3. Subjective Scope

The provisions included in this Code of Ethics, notwithstanding existing (Vatican and foreign) laws and regulations, shall apply to all persons who are part of higher or subordinate bodies, to adherents, employees, assistants, reference persons, adjuncts and aides, and in general to any FCAPP contractor, without any exception related to their subjective qualification. Anyone who works in any capacity for the achievement of the Foundation's purposes must also comply.

To this end, by way of example only:

- ✓ All actions of the Board of Directors shall be guided by the principles of the Code;
- ✓ All managers, reference persons, assistants, etc., will be expected to operate according to the values and principles set forth in the Code, assuming responsibility for the Foundation's internal and external affairs, and putting these principles into practice, including by strengthening trust, cohesion, and team spirit; also vis-à-vis companies and entities that work or collaborate with FCAPP and its employees;
- ✓ All employees shall conform their actions and conduct to the principles, objectives and commitments of the Code;
- ✓ Contractors and, in general, all third parties who, for any reason, have a working or similar relationship with FCAPP, are required to conform their conduct and professional practices to the Code of Ethics.



The Code of Ethics aims to:

- ✓ *define and explain the values and principles that inform its activities and relations with employees, contractors, institutions and, in general, with any other counterpart;*
- ✓ *lay down the principles of conduct to be observed by the Code's addressees;*
- ✓ *empower those who operate within the scope of the FCAPP to comply with such principles, also by applying the established penalty system, when necessary, to ensure the effectiveness and efficacy of this Code.*

Verifying any non-compliance with the provisions of the Code of Ethics will be the responsibility of FCAPP's Supervisory Board, or any other body with the same control and supervisory functions, if the SB is not operational.

FCAPP will make sure that:

- ✓ *the Code is broadly circulated among adherents, employees, contractors and partners, and anyone who has relations with the Foundation;*
- ✓ *the Code is developed and updated to reflect changes in legislation and in the civil and religious sensitivity of the subjects to whom it is addressed;*
- ✓ *every possible means of information and clarification regarding the interpretation and implementation of the provisions included in the Code are made available;*
- ✓ *checks on any reports of violations of the rules of the Code or of relevant legislation are performed;*
- ✓ *facts are investigated and appropriate penalties are applied, if violations are ascertained;*
- ✓ *that no one will be subject to retaliation of any kind for providing information about possible violations of the Code or relevant rules and regulations.*

1.3. Ethical Principles

The Foundation, and all those who are involved in any way in the exercise of its institutional activities, must comply with the following general principles:

- ***Legality*** - *Compliance with laws, regulations, administrative measures and in general with the regulatory provisions that apply to each situation.*
- ***Equality and Impartiality*** - *All proposals, decisions, and actions shall be taken without any discrimination based on age, sex, race, ethnicity, nationality, political opinion, and/or religious belief.*
- ***Honesty*** - *FCAPP refrains from engaging in acts that are illegal, unlawful, or otherwise inconsistent with a sense of Christian and Catholic righteousness, honor, and professional and human dignity.*
- ***Propriety*** - *FCAPP shall have an irreproachable demeanor, acting with diligence and good faith by meeting its commitments in every domain in which it operates.*
- ***Loyalty*** - *With specific reference to the principle of loyalty, the duty to pursue the interests of the Foundation is particularly relevant. This leads to the need to avoid situations of conflict of interest involving other individuals and businesses. In performing any activity, task and/or role, the interests that are inherent to the Foundation's mission must prevail. In this regard, if a person who is involved in any activity has an interest he or she pursues for himself/herself or others that is even potentially*



in conflict with that of FCAPP, he or she is obliged to report it without delay and to refrain from carrying out said activity.

- **Responsibility** - FCAPP believes it is essential that senior leaders take responsibility vis-à-vis third parties for the services they provide. To this end, when necessary or deemed appropriate, they will delegate their powers to promote professional growth and empower those who have been entrusted with specific tasks within the institution, making sure that the assignment of delegated tasks is not used to justify a lack of interest or abuse of power to the advantage of the delegator.
- **Transparency** - Whenever the Foundation provides its counterparts with information and clarifications of any kind, whether they are necessary or simply appropriate, it vouches for their truthfulness and full credibility.
- **Reliability** - The Foundation assures its counterparts that it will respect the commitments it has undertaken and that what had initially been planned will correspond to what was later implemented, except in case of unfavorable and/or unforeseeable circumstances beyond its control, thus promoting the establishment of a relationship of complete trust.
- **Mutual Respect** - Mutual respect is an essential requirement for all those who have relations of any kind with the Foundation. Bullying, threats or behavior aimed at influencing the actions of others in a way that is contrary to the law or the Code of Ethics, or conduct that is insulting or in any case harmful to the moral and personal convictions and preferences of each person, will not be tolerated.
- **Cooperation** - FCAPP promotes cooperation and mutual collaboration by recognizing the value of the human resources employed in the institutional activity of the organization in order to improve and enhance the professional worth of each employee or contractor.
- **Environmental Protection and Safety** - FCAPP protects the environment in adherence to the precepts of the Encyclical "Laudato Si, by the Holy Father Francis, on the care of our common home" issued in Rome on May 24, 2015 and published on June 18, 2015. It also ensures safety in the workplace in compliance with existing legislation.
- **Propriety and integrity in relations with public administration** - In the management of any relation or contract with representatives of (Vatican and foreign) public administration, proper behavior and integrity of conduct must be guaranteed, while fully respecting institutional roles and responsibilities. FCAPP rejects any pressure, favoritism, facilitation, or "special" treatment aimed at obtaining undue benefits for those it works with, any public entity and/or the Foundation itself.
- **Confidentiality** - FCAPP ensures the confidentiality of information and personal data acquired in the course of its work. Similarly, all those who are involved in FCAPP initiatives may not use information and/or data for purposes unrelated to the performance of their duties.
- FCAPP is committed to protecting information about its employees and third parties, that is generated or acquired within its structure and in its relations with its counterparts, and to avoiding any misuse of this information.
- Each employee may acquire and process only data that is necessary and appropriate for the purposes related to his or her duties and must store data in such a way as to prevent unauthorized persons from gaining knowledge of it. In any case, after having verified the usability of the information, employees shall process data using operational methods that allow authorized persons to access them in a way that ensures the completeness, accuracy and truthfulness of the information that can be acquired.



- ***Propriety and integrity in relationships with private parties*** - Proper treatment and integrity of professional and interpersonal conduct must be guaranteed with particular attention, especially in handling relations and/or contracts with representatives, employees or contractors of other private parties. FCAPP rejects any form of pressure, offer or promise of payment or other benefit aimed at obtaining undue benefits or advantages for the personal interest of involved parties and/or the Company.
- ***Quality*** - FCAPP strives to achieve the highest quality standards in performing its mission.

2. RULES OF CONDUCT

2.1. Rules of Conduct with Third-Party Companies.

FCAPP pledges to provide the companies and entities with which it interacts and cooperates with accurate, truthful and timely information.

FCAPP pledges to protect and enhance the value of its business and of the entities with which it works. FCAPP ensures equal treatment by avoiding unlawful preferential behavior.

FCAPP also rejects corrupt practices in business relations between private parties. Prohibited and sanctioned conduct includes receiving, or even merely offering (by FCAPP personnel or anyone acting on their behalf) undue economic or other benefits, or advantages, related to the activity that is being performed.

Therefore, not only is the promise or giving of payments for corrupt purposes expressly forbidden, but also the following:

- any kind of gratuity or gift, including discounts and credit exceeding normal standards of proportion that are considered socially acceptable;
- any promise of or offer of employment opportunities, as well as other types of benefits or advantages, excluding meals and transportation, provided that they have a modest economic value;
- any kind of benefit or advantage aimed at family members of those who hold senior positions within the entity, or persons who are socially comparable to them;
- any kind of business courtesy exceeding normal standards of proportion that are considered socially acceptable;

2.2. Rules of Conduct with Suppliers

In its relationships with suppliers, FCAPP is guided by the principles of equality, transparency, propriety and competition as outlined above.

Therefore, in dealing with suppliers, Foundation employees must:

- strictly comply with internal procedures related to selecting and managing relations with suppliers;



- observe and comply with all legal provisions applicable to each situation and contractual terms and conditions;
- secure cooperation from suppliers in ensuring that customers' needs are met in terms of product quality;
- abide by the principles of transparency and completeness of information in correspondence;
- not accepting any promise and, in any case, refusing to receive money or other benefits or advantages, from anyone, to perform actions that are consistent with or contrary to the duties of their office.
- avoid being subjected to any form of conditioning by third parties outside the foundation, both in making decisions and performing actions relating to their work;
- Exceptionally, senior and subordinate positions in FCAPP are allowed to receive gifts and gratuities only if they involve items that are considered of modest value according to established social practice.

Any employee who receives an offer of any form of gift, gratuity or benefit, other than those of modest value, or which are usually attributable to normal courteous relations, may not accept the gift and must promptly report the offer to his or her immediate superior.

Furthermore, in its relations with suppliers, the Foundation prohibits any form of direct or indirect activity aimed at obtaining or maintaining an undue advantage, for one's own benefit or behalf.

FCAPP staff, or anyone acting on behalf of FCAPP, shall not offer or receive any financial or other undue benefit or advantage in connection with their work. Such conduct amounts to corruption and it includes:

- any kind of gratuity or gift, including discounts and credit, except in the case of low-value items and for socially acceptable use;
- any promise or offer of employment opportunities, as well as other types of benefits or advantages, excluding meals and transportation, provided that they have a modest economic value;
- any kind of benefit or advantage aimed at family members or persons that are socially comparable to them;
- Any kind of courtesy exceeding normal standards of proportion that are socially acceptable.

All purchasing processes have been organized as to protect the image of FCAPP.

To this end, the departments of the Foundation that take part in these processes must:

- provide equal participation opportunities in the selection of eligible suppliers;
- verify, also by documentary evidence, whether suppliers have the means, financial resources, organizational structures, skills, know-how, and quality systems that are appropriate to the Foundation's needs and image.

Therefore, terms and conditions must be provided for in contracts with suppliers that include:

- statements from suppliers showing that they are endowed with organizational requirements, know-how and resources that are appropriate to the needs and image of FCAPP, and that effective and (preferably certified) adequate quality systems are already in place;
- the possibility to carry out inspections at the production units or operational headquarters of the supplier to verify compliance with requirements;



- the possibility to avoid long-term binding projects based on short-term contracts that require continuous renewals with price revisions; or consultancy contracts without adequate transfer of know-how.

To ensure maximum transparency and efficiency of purchasing processes, where necessary and possible the FCAPP will provide for:

- the separation of roles between the offices that request products/services and the office that signs the related purchase contracts, if this is practically feasible at organizational level;
- operating instructions governing the duty to adequately document the choices that have been made;
- the preservation of information and official documents relating to the selection of suppliers, as well as contractual documents, for the periods established by existing regulations and referred to in internal purchasing procedures;
- operating instructions that regulate cases in which payments may be made to parties other than those who sold the goods or provided the service, as well as cases in which payments may be made to foreign parties or to current accounts opened with foreign banks.

For the actual implementation of the above purposes, FCAPP will bring the content of this Code of Ethics to the attention of its suppliers.

Violations of the general principles of the Code of Ethics entail penalties that are also aimed at preventing crimes against Public Administration.

In particular, specific statements regarding suppliers' knowledge of and compliance with the principles contained in the Code of Ethics, as well as express termination clauses actionable by FCAPP in case of violation of such principles, are expressly provided for in individual supply contracts.

2.3. General Rules of Conduct

FCAPP pledges to fully comply with the obligations established by current legislation, contracts and pre-established standards of quality, as well as with the rules of conduct that have become part of the Social Doctrine of the Church. This commitment is of primary importance to FCAPP. The Foundation also pledges not to discriminate in any way against its counterparts, to establish a profitable and fruitful relationship based on openness, respect, courtesy and to look for and offer maximum cooperation. Of course, all this must be characterized by the utmost rigor and professionalism.

Therefore FCAPP's senior management, employees and contractors must:

- strictly abide by the provisions of this Code and the internal procedures relating to the management of relations with any counterpart;
- ensure the quality and reliability of provided services, watching over their full compliance with quality standards required by relevant regulations;
- provide their counterparts with any information on the contractual terms and conditions (if any) and on any changes in the economic and technical conditions provided for therein;
- behave in a helpful, respectful and courteous manner, consistent with FCAPP's highest professional standards;



- *perform their activities with a view to constantly improve interpersonal relations, preparing and using appropriate communication systems for this purpose.*

In compliance with the principles indicated above, should a representative of FCAPP (or even a simple contractor) become aware of any unlawful conduct carried out by (current or potential) counterparts, he/she must promptly interrupt all relations with said counterparts and provide adequate information to the SB which, having verified the situation, will report to the President of the Board of Directors or the Secretary General, where applicable. The Board of Directors will evaluate individual reports and decide on the most appropriate action to be taken in each specific case.

By way of example, a list of offences is provided which, if detected or suspected, must necessarily be reported:

- *money laundering - self laundering;*
- *funding/belonging to terrorist groups or organizations;*
- *illicit drug trafficking;*
- *illegal arms trafficking;*
- *aiding and abetting illegal immigration;*
- *smuggling;*
- *extortion;*
- *corruption of public officials/public servants;*
- *supporting/belonging to criminal organizations;*
- *fraud;*
- *financial exploitation of incapacitated persons;*
- *art trafficking;*
- *exploitation of child labor.*

Furthermore, in its relationships with counterparts, FCAPP prohibits any form of direct or indirect activity that is aimed at obtaining or maintaining an illegal advantage to the benefit or on behalf of FCAPP.

Prohibited conduct related to bribery includes FCAPP personnel, or anyone acting on their behalf, offering or receiving a financial or other undue benefit or advantage in connection with their work; not only with respect to any promise or giving of money, but also with respect to

- *any kind of gratuity or gift, including discounts and credit;*
- *any offer or promise of employment opportunities, as well as other types of benefits or advantages, excluding meals and transportation, provided they have a modest economic value;*
- *any kind of benefit or advantage aimed at family members or persons that are socially comparable to them;*
- *any kind of business courtesy exceeding normal standards of proportion that are considered socially acceptable;*

2.4. Rules of Conduct with Employees.

FCAPP considers human resources as a central element of its organization and is committed to developing each employee's skills and competencies so that their potential and creativity can be fully



expressed in their work. FCAPP offers its contractors and employees the same opportunities for professional growth without any discrimination.

The evaluation of candidates participating in selection processes is focused on verifying the fulfilment of professional and psychological requirements provided in the job description. Obviously fully respecting the dignity, personality, private life, and personal opinions of the candidate.

No favoritism or forms of patronage hiring are allowed.

FCAPP ensures that personnel selection will be made by individuals who do not have a conflict of interest with candidates.

Employees are hired under regular employment contracts and in full compliance with relevant Vatican laws (e.g., n° CXXVI Â - *Decree of the Pontifical Commission for the Vatican City State promulgating the General Regulations for the Personnel of the Governorate of the Vatican City State*), thus favoring the optimal integration of the employee into the work environment.

FCAPP offers the same opportunities to all its staff members who are endowed with the characteristics that are required to access higher roles, assignments and positions, based on strictly meritocratic criteria, professional competence and, in any case, on strictly professional parameters.

FCAPP sees employee training as indispensable, as well as the need to constantly update their knowledge on specific issues to correctly implement the Foundation's organizational model (for example, anti-money laundering regulations). The Foundation also promotes team spirit and mutual collaboration and expects employees, at every level, to collaborate in maintaining a climate of mutual respect for the dignity and honor of each individual.

FCAPP prohibits any and all forms of psychological, physical and sexual harassment of employees, suppliers, associates, counterparts, or any other person. Harassment is defined as any form of intimidation, threat or coercion that disrupts the orderly conduct of individual business activities. This also includes any abuse of authority by a superior (e.g. by requesting or imposing services or personal favors that undermine workers' peace of mind with objective implications for their performance).

Other prohibited activities include:

- *consuming substances during working hours (e.g. narcotics, hallucinogens, alcohol) or anything which in any case might influence the regular performance of work activities;*
- *taking substances before performing work activities (for example: narcotics, hallucinogens, alcoholic beverages in excess of the adequate use associated with meals) or anything which in any case might influence the regular performance of work activities;*
- *smoking in places where it is expressly forbidden.*

FCAPP is committed to spreading and promoting a culture of safety in the workplace by developing risk awareness related to the performance of individual tasks and promoting responsible behavior by all employees and contractors.

FCAPP also works to protect the health and safety of workers, primarily through prevention.



2.5. Rules of Conduct with Contractors, External Consultants, Third Parties.

Each employee of the Foundation in relation to his or her duties will take care to:

- rigorously abide by internal procedures for the selection and management of relations with FCAPP's external contractors, irrespective of how their job title (for example: consultants, representatives, agents, etc.);
- carefully select qualified individuals and companies with excellent reputations and irreproachable moral integrity;
- promptly report any violation of the Code of Ethics by external contractors and consultants to their immediate superior;
- expressly mention the obligation to comply with the principles of the Code of Ethics in all contracts, and punish any failure to comply with said principles by possibly exercising the Company's right to terminate the contract.

FCAPP, in its relations with contractors, external consultants and third parties, prohibits any form of direct or indirect activity that is aimed at obtaining or maintaining an undue advantage for or on behalf of the Foundation. Prohibited conduct related to corruption includes offering or receiving an economic advantage, or other undue utility or benefit, in relation to the activity carried out. This applies to Foundation employees or anyone acting on its behalf, and does not only refer to of not promising or giving money, but also includes:

- any kind of gratuity or gift including discounts and credit;
- any offer or promise of employment opportunities, as well as other types of benefits or advantages, excluding meals and transportation, provided they have a modest economic value;
- any kind of benefit or advantage aimed at family members or persons that are socially comparable to them;
- any kind of business courtesy exceeding normal standards of proportion that are considered socially acceptable;

2.6. Rules of Conduct with Public Administration and Public Institutions.

Relations with Public Administration and Public Institutions are exclusively limited to operational roles that have been designated and authorized for such tasks, in compliance with the strictest observance of applicable laws and regulations and this Code of Ethics.

Individuals performing such roles shall never act in a manner that jeopardizes the integrity and reputation of FCAPP.

For this reason, all documentation relating to contacts with public administration must be collected, filed and stored separately.

For the purposes of this Code, "Public Administration" shall mean any public body, independent administrative agency, natural person or legal entity, acting as a public official or as a public service appointee under both Vatican law and individual foreign laws.

With respect to employees of Public Administration or officials acting on behalf of Public Administration:



- *active or passive corruption or collusive behavior of any kind or in any form whatsoever is not permitted;*
- *it is not permitted to offer or promise money or other benefits, or to perform acts of business courtesy that benefit managers, officials or employees of Public Administration or their relatives, unless they involve low-value items, the giving of which cannot in any way be interpreted as a means of receiving illegitimate favors;*
- *it is prohibited to make payments, including indirect payments, to public officials and third parties related to them, in order to obtain more favorable treatment, or to influence the performance or omission of an official act, or to give or receive unlawful favors.*
- *unlawful payments to entities or their employees, as well as unlawful payments made through persons acting on behalf of such entities, are prohibited;*
- *offering or promising personal discounts or credits is prohibited;*
- *promising employment opportunities, benefits or other advantages is also prohibited.*

Any violation committed by FCAPP employees or third parties should be promptly reported to the internal body charged with supervisory functions. Behavior that is suitable for and conducive to bribery that is not subsequently committed should also be reported.

In its institutional relations, FCAPP is committed to representing the interests and positions of the Foundation in a transparent, rigorous and consistent manner, avoiding collusive attitudes. All contracts with institutional counterparts are made exclusively through representatives who have received an explicit mandate from the Board of Directors.

In the management of relations with (Vatican and foreign) Administrative Authorities, FCAPP pledges not to deny, conceal, manipulate or delay any information or request made by them in the exercise of their inspection functions, and to collaborate actively in the course of investigative procedures.

2.7. Rules of Conduct with all other Counterparts

2.7.1. Relations with Judicial Authorities

FCAPP shall ensure maximum propriety and cooperation when dealing with (Vatican and foreign) Judicial and Law Enforcement Authorities in all circumstances when necessary.

Directors and employees who are involved in any investigation and inspection by competent authorities must behave loyally, provide truthful information and give correct and accurate information.

When dealing with representatives from (Vatican and foreign) Judicial or Law Enforcement Authorities, (Vatican and foreign) it is also forbidden to promise, give or receive favors, amounts and benefits of any kind that are aimed at obtaining personal advantages or advantages for FCAPP.

In handling any legal proceedings in which the Foundation or one of its employees may be involved, any kind of corrupt conduct, such as offering or giving payments or compensation, however made, to favor or damage a party in a civil, criminal or administrative trial, is strictly forbidden.



Prohibited conduct related to bribery refers not only to promising or giving monetary payments, but also to

- Any kind of improper payments made through persons acting on behalf of entities;
- Any kind of gratuity or gift, including discounts or credit;
- offering or giving any kind of employment opportunity, or any other kind of benefit or advantage;
- any kind of benefit or advantage aimed at family members or persons that are socially comparable to them;
- any kind of business courtesy;

It is also strictly prohibited to:

- compel or induce someone, through violence or threats, or by offering or promising money or other benefits, not to make statements or make false statements to Judicial Authorities;
- help someone evade investigations of Judicial Authorities or to evade their searches.

FCAPP requires its directors and employees to:

- refrain from conduct aimed at obstructing the course of justice;
- cooperate fully with investigating authorities on any request made by them, always providing truthful information;
- promptly send to the Supervisory Body, or to another body to which relevant powers have been delegated, a special report on relations with judicial, investigating and law enforcement authorities.

2.7.2. Relations with Political Parties and Trade Unions.

FCAPP does not make contributions of any kind or form to parties, movements, committees, associations, political organizations and trade unions, their representatives and candidates. It refrains from exerting any kind of direct or indirect pressure on political representatives of foreign countries and does not make contributions to organizations which might give rise to a conflict of interest.

FCAPP directors and employees in turn, may not engage in any political activity during working hours, excluding union activity. They may not use Company property or equipment for that purpose. They must also always make it clear that any political views they express to third parties in the course of their duties are strictly personal and do not represent the views of the Company.

2.7.3. Contributions and Sponsorships

FCAPP, in compliance with its Statute, does not make contributions except to the Apostolic See.

FCAPP does not engage in sponsorship activities. The Board of Directors may consider such sponsorship only in exceptional cases and exclusively upon specific written request of the Secretariat of State; in any case, only limited to proposals that are in conformity with the purposes of the Foundation and that come from declared non-profit organizations with regular Statute and articles of association.

Individual local chapters may not make any payment, contribution, or sponsorship.



Sponsorship activities that (exceptionally) may be authorized, are intended only for events that offer a guarantee of quality or for which FCAPP can be involved in the planning stage, in order to ensure originality and effectiveness. In any case, only for purposes that are consistent with those of the association.

In any case, in choosing the proposals to accept, FCAPP pays particular attention to any possible conflict of interest of a personal or corporate nature.

Any promotional and advertising activity of the Foundation shall be carried out in full compliance with all relevant regulations and laws for the protection of intellectual property, copyright, as well as Vatican Law no. CXC VII - Law on the protection of copyright on intellectual works and related rights of 1 September 2017.

FCAPP prohibits any form of direct or indirect activity aimed at obtaining or retaining an improper advantage for or on behalf of FCAPP. Prohibited conduct related to bribery and corruption includes offering or receiving an economic advantage, or other undue utility or benefit, in relation to the activity carried out. This applies to Foundation employees or anyone acting on its behalf, and does not only refer to of not to promising or giving money, but also include:

- *any kind of gratuity or gift including discounts and credit;*
- *any offer or promise of employment opportunities, as well as other types of benefits or advantages, excluding meals and transportation, provided they have a modest economic value;*
- *any kind of benefit or advantage aimed at family members or persons that are socially comparable to them;*
- *any kind of business courtesy exceeding normal standards of proportion that are considered socially acceptable;*

3. TRANSPARENCY IN ACCOUNTING AND INTERNAL CONTROLS

3.1. Accounting Records

Accounting transparency is based on the truthfulness, accuracy and completeness of information of relevant accounting records.

Each employee is required to cooperate to ensure that all operating events are correctly and promptly represented in the accounts.

Adequate supporting documentation of the activity carried out is kept on file for each operation, so as to allow for the following

- *easy book-keeping;*
- *identification of different levels of responsibility;*
- *accurate tracing of economic-accounting operations, also to reduce the likelihood of interpretation errors.*

Each record must reflect exactly what is reported in the supporting documentation. It is the responsibility of each employee to ensure that the documentation is easily traceable and organized according to logical criteria.



No one may make payments on behalf of the Foundation without adequate supporting documentation.

FCAPP employees and contractors who, in the course of their duties, become aware of omissions, forgeries or neglect in accounting records or supporting documentation, are required to promptly report them to their immediate superior.

3.2. Internal Controls

In the pursuit of its mission, FCAPP's policy is to disseminate knowledge and awareness of the existence of controls at all levels, and to encourage the acquisition of a mentality oriented towards the continuous exercise of controls.

An attitude of constant and careful scrutiny, especially among supervisors and managers, should make a positive contribution to improving the Foundation's efficiency and ethics.

"Internal controls" refer to all instruments that are used to direct, manage, and verify the activities of the Foundation, aimed at ensuring compliance with laws and procedures, protecting assets, effectively managing operations, and providing accurate and complete accounting and financial data.

The responsibility for implementing an effective system of internal control is shared by every level of the organizational structure. This implies that all FCAPP employees, within their specific roles and activities, are responsible for the establishment and proper functioning of the control system.

Everyone must responsibly take care of Foundation assets that are instrumental to their work.

3.3 Obligation to Comply with Anti-Money Laundering Regulations.

All individual local Chapters, irrespective of their location, are required to fully comply with Anti-Money Laundering Regulations in their respective countries.

Chapters are required to comply with best practices in terms of anti-money laundering and counter-terrorist financing regulations, and in general with the norms provided for in the relevant Vatican legislation and, more specifically, with Law no. XVIII on transparency, supervision and financial information of 8 October 2013, complementary laws and all related amendments. This applies even more so in cases where individual countries have less stringent controls than those envisaged by Vatican legislation.

4. USE OF FOUNDATION ASSETS

The management and use of Foundation assets must be guided by principles of integrity, Correctness, and accountability.

Staff at all levels are required to respect and safeguard the Foundation's tangible and intangible assets and prevent their fraudulent or improper use.

IT tools available to staff shall be used only to optimize work performance and without prejudice to FCAPP.



All persons operating in each local Chapter are prohibited from engaging in any IT activity that may include possible criminal conduct under the criminal code or special laws of the country in which the Chapter is located.

Prohibited activities include:

- *Engaging in any activity aimed at tampering with IT system protections of FCAPP and of any entity with which FCAPP has relations;*
- *fraudulently creating, modifying or deleting third-party data;*
- *Unauthorized access to a third party's computer network to acquire confidential information;*
- *Holding passwords to access third party sites;*
- *fraudulently installing devices to intercept third-party communications;*
- *distributing illegal software or viruses via the entity's network;*
- *damaging third-party e-commerce tools;*
- *Acquiring and using unlicensed IT tools.*

Telephones and other communication equipment that may be provided by the Foundation to its employees and contractors are the property of the Foundation and should be used for business purposes only.

FCAPP allows moderate use of email systems for personal purposes, with the understanding that the use of email is primarily reserved for communications related to Foundation business. Using social networks during working hours is prohibited.

5. HEALTH AND SAFETY

As part of its activities, FCAPP is committed to contributing to the development and well-being of the community in which it operates, while pursuing the goal of ensuring the safety and health of employees, contractors and customers.

In compliance with current Vatican health and safety regulations (LIV of 10 December 2007), FCAPP is committed to spreading and promoting a health and safety culture at work, developing risk awareness and promoting responsible behavior for all its employees and contractors. It also works to preserve the health and safety of workers, where necessary through training plans, prevention programs and periodic inspections.

FCAPP is committed to adopting strategies to improve occupational health and safety outcomes by operating in line with the following principles:

- *preventing possible accidental events, protecting the health and safety of employees and the entire community;*
- *Ensuring compliance with current safety legislation and keeping abreast of legislative developments;*
- *Raising awareness, educating and training all levels of staff to involve all human resources, in order to achieve high levels of professionalism and quality of performance on safety and health issues.*



6. SUPERVISORS FOR THE IMPLEMENTATION OF THE CODE OF ETHICS

The Supervisory Body is responsible for the observance and correct interpretation of the Code of Ethics and Conduct.

If the SB is not in place or temporarily inactive, the relevant functions will be entrusted to a corporate body endowed with similar control and supervision powers.

Staff members may report any requests for clarification or possible non-compliance with the Code to their immediate superiors or to the Supervisory Board (odv@foundation.va).

All requests will be answered without any risk of direct or indirect retaliation against whistleblowers.

In any case, the anonymity of the whistleblowers is guaranteed.

With regard to the Code of Ethics and Conduct, the Supervisory Board will meet as often as deemed necessary and will ensure:

- *The dissemination of the Code of Ethics and Conduct to the staff and in general to all third parties who come into contact with the organization during its activities;*
- *Support in the interpretation and implementation of the Code of Ethics and Conduct, as well as its updating;*
- *The evaluation of any rule violation, and in the event of infringement, adoption of appropriate measures, in collaboration with the competent functions of the Foundation, in compliance with relevant laws, regulations and labor contracts;*
- *That no one can be pressured or harassed for reporting conduct that does not comply with the Code of Ethics and Conduct.*

7. PENALTY SYSTEM.

Failure to comply with the rules contained in the Code of Ethics entails the application of the disciplinary measures set out below:

- a. VERBAL WARNING, WRITTEN WARNING,
- b. PECUNIARY PENALTY (not exceeding € 100.00);
- c. SUSPENSION FROM MEMBERSHIP ROLL (for a maximum of 30 days);



CODE OF ETHICS

CENTESIMUS ANNUS PRO PONTIFICE FOUNDATION

1st ed - 2021

d. REMOVAL FROM MEMBERSHIP ROLL when non-compliance corresponds to "offenses under the law" or "acts such as to radically undermine the Foundation's trust in him/her," or when non-compliance causes serious moral and/or material harm to the Foundation.



ANNEX A) - Declaration of responsibility and absence of conflicts of interest

I, the undersigned, an employee of FCAPP with the title of _____, declare that I am familiar with the content of the Code of Ethics adopted by the Foundation.

I further declare that:

- *I have not taken any action contrary to the principles of the Code of Ethics;*
- *I have never found myself in situations of conflict of interest with representatives of the public administration;*
- *I have never exceeded or abused the powers conferred upon me;*
- *I have never exceeded established signature limits;*
- *I have always complied with FCAPP procedures and disclosure requirements set forth in the Code of Ethics.*
 - *I pledge to comply with the provisions included in the Italian criminal code regarding IT crimes (only for employees working within the Vatican City State).*

I declare that I am not aware of any events or facts that could adversely affect the adequacy, completeness, effectiveness, and effective application of the Code of Ethics.

In witness whereof,

First and last name

Date



CODE OF ETHICS

CENTESIMUS ANNUS PRO PONTIFICE FOUNDATION

1st ed - 2021

ANNEX B) - Termination clause to be included in contracts with third parties

I, the undersigned, as legal representative of the Company _____, declare that I am aware of the Code of Ethics provided for by FCAPP in relation to this assignment.

I, the undersigned, on behalf of the represented Company, agree to conduct myself in accordance with the principles of the FCAPP Code of Ethics.

Failure of the undersigned to comply with this commitment will constitute a serious breach of contract and will entitle FCAPP to terminate this contract effective immediately, subject to any other statutory reservation.

In witness whereof

First and last name

Job title

Date