

CODE OF ETHICS

Introduction

The ROBERT HOLLMAN FOUNDATION is a private, not-for-profit foundation (hereinafter “the Foundation”) committed to promoting and providing care, support, education and inclusion services for children with low vision and visual impairments, as well as supporting their families and the community.

The ROBERT HOLLMAN FOUNDATION bases its activities on compliance with applicable laws and regulations, as well as on adherence to the principles and standards of conduct set out in this Code of Ethics (hereinafter the “Code of Ethics” or the “Code”). Indeed, the Code sets out the values, principles and rules of conduct that guide the Board of Directors, staff, trainees, collaborators and anyone working with the Foundation in any capacity.

1. Core values guiding the Foundation

- **The child** at the centre: we believe that all operational decisions must prioritise the well-being, safety, dignity and development of the child.
- **Respect and dignity**: we aim to recognise and protect individual differences at all times and to treat people and families with respect.
- **Inclusion**: our aim is to remove barriers (physical, communicative and cultural) to enable full participation.
- **Equity**: we are committed to ensuring equal opportunities in access to services.
- **Transparency and accountability**: we manage our resources responsibly and communicate clearly with partners, sponsors, suppliers and donors.
- **Quality and professionalism**: our aim is to achieve high standards in the design and delivery of services.
- **Collaboration**: it is essential for the Foundation to build a network with families, schools, health services, institutions and associations.

2. Scope of application

This Code applies to:

- Members of the Board of Directors;
- Management and staff;
- Trainees;
- External collaborators, suppliers and partners whilst carrying out activities related to the Foundation.

3. General principles and obligations

ETHICAL PRINCIPLES

Those acting on behalf of the ROBERT HOLLMAN FOUNDATION undertake to diligently acquire the necessary knowledge of the relevant laws and regulations and, in the case of employees, of the internal provisions applicable to the performance of their duties, and to comply with them strictly.

The ROBERT HOLLMAN FOUNDATION respects the dignity and individual characteristics of its staff, valuing their skills, opposing unjustified and discriminatory pay differences, and involving them in training programmes, in the knowledge that this enables the Foundation to achieve sustainable competitive advantages.

In carrying out their duties, every person working for the ROBERT HOLLMAN FOUNDATION:

- Maintains conduct guided by moral integrity and transparency, as well as the values of honesty and good faith.
- Recognises and respects the personal dignity, privacy and personal rights of every individual, paying particular attention to those in vulnerable circumstances.

- Rejects any discrimination based on disability or differences in race, culture, religion, gender, age, political affiliation, trade union membership or sexual orientation.
- It does not engage in harassment, violence or personal insults of any kind.
- It operates with the utmost cooperation and respect towards colleagues, consultants and other staff.

In particular, the ROBERT HOLLMAN FOUNDATION bases the work of its employees and collaborators on respect for professionalism, freedom and the dignity of workers, avoiding the use of any form of physical, bodily or mental coercion, verbal abuse or any other form of offence against personal dignity, and also providing for disciplinary measures, rejecting the use of child labour in general and of forced or compulsory labour, guaranteeing the right to health and safety at work as well as the right to freedom of association and collective bargaining, the right to a living wage and fair working hours, and the absence of discrimination of any kind.

Every person acting on behalf of the ROBERT HOLLMAN FOUNDATION shall carry out their duties with the professionalism required by the nature of the tasks and functions assigned to them, making every effort to achieve the objectives and assuming the responsibilities incumbent upon them. They shall also diligently undertake the necessary research and professional development and shall cooperate when participating in projects and internal procedures. Every person acting on behalf of the ROBERT HOLLMAN FOUNDATION undertakes to comply with the following ethical obligations, which are considered essential:

1. Safeguarding and protection of children

- Primary duty: to protect children from abuse, neglect or conduct that may harm their physical, emotional or psychological well-being.
- Any sign of risk or suspicion must be reported immediately in accordance with the internal reporting procedure.

2. Accessibility of services

- All information and educational materials must be made available in accessible formats (audio, Braille, high-contrast print, digital texts accessible via screen readers, tactile materials).
- All spaces and events must be planned with due regard for physical and sensory accessibility.

3. Family involvement

- Families are partners in rehabilitation and educational decisions; their views must be listened to and valued.
- The ROBERT HOLLMAN FOUNDATION promotes mutual support networks and opportunities for sharing experiences.

4. Non-discrimination and respect for differences

- No discrimination is permitted on the grounds of disability, gender, ethnicity, religion, sexual orientation, economic circumstances or social status.

5. Confidentiality and data protection

- All personal and health data relating to children and families are treated with the utmost confidentiality in accordance with the GDPR and national legislation. Each employee or contractor has access to data only for legitimate purposes and is obliged to comply with appropriate security measures, as set out in the ROBERT HOLLMAN FOUNDATION's Privacy Operating Model, the General Regulations, the Job Descriptions provided to Authorised Internal Staff, and confidentiality agreements and regulations governing security measures.

6. Management of funds and conflicts of interest

- The ROBERT HOLLMAN FOUNDATION ensures that its resources are managed in accordance with the principles of fairness, transparency, traceability and accountability. Economic and financial information is retained and made available within the limits and in accordance with the procedures laid down by current legislation and by the internal regulations adopted by the ROBERT HOLLMAN FOUNDATION.

- The ROBERT HOLLMAN FOUNDATION, in line with the principles of transparency, honesty and fairness, is committed to implementing the necessary measures to prevent and avoid conflicts of interest, basing its relationships with its staff on mutual trust and loyalty, so that every decision taken on behalf of the ROBERT HOLLMAN FOUNDATION is in its best interests. Specific approval procedures will be put in place for significant expenditure and contractual commitments.
- Anyone acting on behalf of the ROBERT HOLLMAN FOUNDATION undertakes to use funds and assets responsibly and in a traceable manner, ensuring that resources are allocated in accordance with the Foundation's statutory purposes.

Those acting on behalf of the ROBERT HOLLMAN FOUNDATION shall therefore:

- refrain from seeking personal gain in the course of their activities;
 - avoid any situation in which they might find themselves, even potentially, in a conflict of interest with the ROBERT HOLLMAN FOUNDATION;
 - shall avoid any situation that might interfere with their ability to make impartial decisions in the interests of the ROBERT HOLLMAN FOUNDATION and in full compliance with the provisions of this Code;
 - subject to any applicable statutory or contractual provisions, undertake to disclose, within their respective areas of operation, any interest they may have, on their own behalf or on behalf of third parties, in a specific transaction involving the ROBERT HOLLMAN FOUNDATION, and to inform their respective superiors without delay.
- Members of the governing bodies, employees and contractors of the ROBERT HOLLMAN FOUNDATION are prohibited from making any payments, whether direct or indirect, to public officials and/or public administrations in general that are not linked to the provision of services or duly authorised contracts.
 - Gifts, acts of courtesy and hospitality towards public figures are permitted by the ROBERT HOLLMAN FOUNDATION only where they are of modest value and, in any event, such that they do not compromise the integrity or reputation of either party and cannot be interpreted, by an impartial observer, as intended to secure advantages improperly.
 - It is prohibited to employ staff, collaborators or professionals, or to maintain any kind of relationship that could be interpreted as aimed at obtaining advantages, with individuals who are related in any way to public administration officials or equivalent figures who have an ongoing working relationship with the ROBERT HOLLMAN FOUNDATION for professional reasons.

7. **Communication and advocacy**

- All public communications and materials produced by the ROBERT HOLLMAN FOUNDATION must respect the dignity of beneficiaries: no dissemination of images or sensitive information relating to minors and patients is permitted without the informed written consent of their parents or guardians.
- The ROBERT HOLLMAN FOUNDATION promotes inclusion in its public communications in an accurate, never exploitative, and always respectful manner.
- The ROBERT HOLLMAN FOUNDATION promotes the use of information technology, digital tools, means of communication and social media in a manner characterised by responsibility, fairness, security and respect for people's dignity, as an expression of its institutional values and its mission to protect and promote the wellbeing of the children it supports and their families.
- All those acting on behalf of the ROBERT HOLLMAN FOUNDATION are required to use IT and communication tools exclusively for lawful purposes, in compliance with current legislation, internal regulations, IT security, personal data protection and professional confidentiality.
- The dissemination of content via websites, digital platforms, messaging applications and social media must be consistent with the principles of the ROBERT HOLLMAN FOUNDATION, contribute to the promotion of its institutional aims and employ respectful, inclusive and non-discriminatory language, avoiding expressions that are offensive, derogatory, detrimental to people's dignity or likely to compromise the image, credibility and reputation of the ROBERT HOLLMAN FOUNDATION, its professionals, collaborators, users and their families.

- It is mandatory to comply with legislation on copyright, intellectual property and licences, avoiding the unauthorised use, reproduction or dissemination of works, images, software, databases or other protected content.
- Particular attention is paid to safeguarding the identity and privacy of the children in our care. The publication or dissemination, by any means, of photographs, videos or other content that allows for the direct or indirect identification of children is prohibited, except in cases expressly authorised by current legislation and subject to obtaining the necessary consents and authorisations required.
- The use of artificial intelligence systems is permitted solely as a tool to support administrative, organisational or informational activities and must not replace the professional, clinical, educational or decision-making judgement of staff. The use of such tools must comply with the principles of transparency, reliability, security, confidentiality and human oversight. It is prohibited to enter, upload or use, for the purposes of training, learning or processing by artificial intelligence systems, personal data, health data, confidential documents or any other information belonging to the ROBERT HOLLMAN FOUNDATION or relating to its users, except in cases expressly authorised by applicable legislation and by the internal procedures adopted by the ROBERT HOLLMAN FOUNDATION.

8. Sustainability and Awareness of Resource Management

- The ROBERT HOLLMAN FOUNDATION recognises that the responsible management of resources forms an integral part of its ethical and social responsibility and contributes to the pursuit of its institutional aims, promoting organisational efficiency, environmental protection and the optimal use of resources allocated to services for users.
- All those working for the ROBERT HOLLMAN FOUNDATION are required to use the assets, equipment, devices, medical supplies, technological tools and other resources made available to them with diligence and a sense of responsibility, avoiding waste, misuse or unauthorised use, and adopting behaviour geared towards efficiency and the preservation of the ROBERT HOLLMAN FOUNDATION's assets.
- The ROBERT HOLLMAN FOUNDATION promotes the reduction of consumption of energy, water, paper and all other natural resources; it encourages waste reduction, the reuse of materials where possible, separate waste collection and, consistent with care and organisational needs, the adoption of technological and management solutions geared towards environmental sustainability.
- The ROBERT HOLLMAN FOUNDATION is also committed to fostering a culture of responsible resource use through information, training and awareness-raising initiatives aimed at its employees, collaborators, service users, families and the wider community, promoting conscious and environmentally respectful behaviour consistent with the values of solidarity, responsibility and protection of the common good that inspire its activities.

4. Specific protection of minors and operational procedures

- **Selection and training of staff and trainees**

- Before recruiting staff or entering into contracts with collaborators and consultants, the ROBERT HOLLMAN FOUNDATION checks references and qualifications, carries out appropriate background checks and, where required by law, requests the provision of relevant certificates.
- The ROBERT HOLLMAN FOUNDATION requires its staff to be adequately trained in child protection, inclusive communication, accessibility and care for people with visual impairments.

- **Code of conduct regarding children**

- Staff are required to avoid unnecessary physical contact; if necessary, they must always seek prior permission and, where possible, always work in the presence of another member of staff.
- Staff are strictly prohibited from engaging in any physical or verbal behaviour that could be interpreted as violent, sexual or degrading towards patients and their families.

- **Emergency and Safety Procedures**

- Staff are required to be familiar with and comply with evacuation and emergency plans adapted to patients' sensory needs.

- Staff are required to take part in regular training and practical drills.

5. Accessibility of projects and events

Staff at the ROBERT HOLLMAN FOUNDATION undertake to:

- Assess accessibility in advance for every project or event.
- Provide specialist support (tactile and verbal interpreters, audio descriptions, tactile guides, sensory spaces).
- Involve professionals with direct experience in design to verify the effectiveness of the solutions.

6. External communication and informed consent

- Obtaining written consent for the use of photographs, audio/video recordings or personal stories.
- Clear and non-sensationalist communication of experiences: emphasise abilities, experiences and rights rather than impairments.
- Information materials checked for accuracy and appropriate terminology (preferred terminology: ‘child with a visual impairment / partially sighted’, avoid reductive labels).

7. Handling of complaints, reports and whistleblowing

- Clear, accessible and secure reporting channels (dedicated platform, secure form, option for anonymity).
- Guarantee of no retaliation against those who report in good faith.
- Standard timeframes for handling reports (e.g. case taken on within 3 working days; response/formalisation within 30 days, unless the matter is complex).
- Impartial internal investigation and, where necessary, involvement of the relevant authorities.

8. Relations with partners, sponsors and suppliers

The ROBERT HOLLMAN FOUNDATION aims to select partners, sponsors and suppliers who share the Foundation’s values and who comply with this Code.

The ROBERT HOLLMAN FOUNDATION aims to include ethical compliance clauses in all its contracts, as well as to assess in advance the impact of partners, sponsors and suppliers (reputational, operational and ethical impact) before establishing a relationship or any other form of collaboration.

9. Training, communication and monitoring

The ROBERT HOLLMAN FOUNDATION undertakes to:

- Conduct an annual compulsory training programme for all staff on accessibility, child protection, the GDPR and emergency management.
- Regularly monitor the implementation of the Code (through internal and external audits).
- Publish an annual sustainability/ethics report setting out actions, results and plans for improvement.

10. Disciplinary measures and remedies

- All breaches of this Code will be assessed and, depending on their severity, may result in warnings, suspensions, termination of employment or referral to the relevant authorities.
- In all cases, all disciplinary procedures will comply with the law and applicable contracts, whilst guaranteeing the right to a defence.

11. Review of the Code

This Code will be reviewed at least every two years or whenever there are changes to relevant legislation, industry best practice or the activities of the ROBERT HOLLMAN FOUNDATION.