OFFICIAL EXECUTIVE & OPERATIONAL DOCUMENTATION

Institute of Human Rights and Media Foundation

Organization (IPCIM): Foundation "Institute of Human Rights and Media" **Document Suite:** Standard Operational Procedures & Regulations

1. PRESS ALERT AND RAPID EXPERT RESPONSE PROCEDURE

§ 1. Purpose and Scope of the Procedure

1. This procedure defines the rules and mode of rapid response of the "Institute of Human Rights and Media" Foundation (IPCIM) to sudden and significant media, legal, or political events that pose a direct threat to human rights or media freedom in Poland or abroad.
2. The objective is to ensure a swift, professional, and consistent public response by the Foundation.

§ 2. Definition of "Press Alert"

1. A Press Alert (PA) is defined as any situation where:
   - **a)** A violation of fundamental human rights occurs (e.g., arrest of a journalist, hate speech, unlawful discrimination).
   - **b)** An urgent need for expert legal or substantive commentary arises (e.g., draft of a new harmful bill or regulatory change).
   - **c)** Mass disinformation occurs that requires immediate correction and fact-checking.
2. The decision to trigger a Press Alert is taken by the President of the Management Board or a designated Board Member, and in their absence, by the Executive Director.

§ 3. Stages of Rapid Response

1. **Initial Verification (max. 1 hour):**
   - a) Identification of the threat and preliminary assessment of its severity.
   - b) Convocation of an ad-hoc expert team (Management Board, Communications Coordinator, Legal Expert).
2. **Analysis and Official Position (max. 4 hours):**
   - a) Fact gathering, verification, and legal analysis.
   - b) Drafting of the Foundation's official position, which must comply with its mission and Articles of Association.
   - c) In particularly sensitive matters — seeking an urgent opinion from the Foundation's legal counsel or the Ethics Council.
3. **Implementation and Communication (immediately upon approval):**
   - a) Public statement: The Foundation's official statement is published on the website, social media channels, and distributed to key media outlets.
   - b) Legal support: Decision on potential legal intervention, e.g., submitting an *amicus curiae* brief or filing a formal notification of a suspected offense.
   - c) Monitoring: Continuous monitoring of the issue and readiness for further follow-up actions.

§ 4. Communication Rights and Mandate

1. The President of the Management Board or a Board Member explicitly authorized by the President holds exclusive authority to approve the Foundation's official position.
2. In emergency situations, the authorized person may convey the position orally to the media, subject to an obligation to immediately draft and publish its written version.

3. All Associates are obliged to urgently inform the Management Board of potential Press Alerts (via SMS, telephone, or urgent e-mail).

2. CODE OF ETHICS

§ 1. General Provisions

1. This Code of Ethics (hereinafter referred to as the "Code") sets out the core values, standards of conduct, and ethical principles guiding the Foundation "Institute of Human Rights and Media" (IPCIM).
2. The provisions of this Code are binding on all members of the Foundation's governing bodies (Management Board, Foundation Council, Ethics Council), the Founder, employees, experts, and volunteers (hereinafter referred to as "Associates").
3. The purpose of the Code is to guarantee the highest quality of activities, transparency, and the building of public trust.

§ 2. Fundamental Values

1. **Independence and Objectivity:** The Foundation and its Associates act impartially, independent of political, economic, or religious influences. Their work is grounded exclusively in facts, the law, and rigorous analysis.
2. **Protection of Human Dignity and Rights:** The Foundation's activities are strictly directed toward defending fundamental rights and freedoms. Every individual is treated with utmost respect and dignity.
3. **Transparency and Accountability:** The Foundation provides clear and publicly accessible information on its funding sources, objectives, and project outcomes, while honoring confidentiality principles.
4. **Professionalism and Integrity:** Associates perform their duties with the highest standard of care and diligence, continuously enhancing their professional qualifications.

§ 3. Rules of Conduct

1. **Conflict of Interest:** Associates are required to avoid situations in which their private, family, or financial interests could conflict with the interests of the Foundation. Any potential conflict must be immediately reported to the Management Board.
2. **Confidentiality and Data Protection:** Sensitive information, confidential personal data, and knowledge obtained during work for the Foundation may only be used for statutory purposes under strict security standards.
3. **Integrity and Financial Stewardship:** Foundation funds and assets must be managed responsibly, economically, and dedicated solely to statutory objectives. Using Foundation resources for private gain is strictly prohibited.
4. **Public and Media Relations:** External communications must rely on factual language, avoiding disinformation and unsubstantiated allegations. Official statements may only be made by authorized individuals.

§ 4. Violations and Whistleblowing

1. Any Associate who observes a breach of this Code or applicable law is obligated to report it:
   - a) To the Ethics Council (if appointed).
   - b) To the Management Board of the Foundation.
   - c) Via the internal whistleblowing channel (e-mail: `sygnalista@ipcim.org`).
2. The Foundation guarantees robust protection against retaliation for individuals reporting violations in good faith (whistleblowers), and their anonymity is strictly safeguarded under the Whistleblowing Policy.
3. Consequences of violations depend on severity — ranging from formal warnings and reprimands to immediate termination of cooperation or notification of law enforcement authorities.

§ 5. Final Provisions

1. All Associates of the Foundation are required to sign an Ethical Declaration confirming familiarity with and acceptance of this Code.
2. The Code is publicly accessible and subject to regular review by the Ethics Council or the Management Board.

3. EXECUTIVE & OPERATIONAL DOCUMENTATION PACKAGE

Supplementing Internal Acts and Operating Procedures for the Foundation. Legal basis: GDPR (EU Regulation 2016/679), Act on Foundations, Labor Code, Accounting Act.

PART A: PERSONAL DATA PROTECTION (GDPR)

Document A1: Record of Processing Activities (ROPA)

Required under Art. 30(1) GDPR and § 3(2) of the Personal Data Protection Policy.

Data Controller (ADO): Foundation "Institute of Human Rights and Media"
KRS: [KRS Number] | **NIP (Tax ID):** [NIP Number] | **REGON:** [REGON Number]
Contact for Data Protection: `rodo@ipcim.org` / `kontakt@ipcim.org`

Processing Activity / Purpose	Data Subjects	Data Categories	Legal Basis	Recipients	Retention Period
Management of Expert Panels & Experts	Experts, panel members, report authors	Name, PESEL/NIP, address, bank account, education, image	Art. 6(1)(b) & (c) GDPR (contract, legal obligation)	Accounting firm, banks, tax authorities	5 years from end of calendar year (archiving/tax)
Personnel & Recruitment Management	Employees, contractors, candidates	Identification data, contact info, career history, financial data	Art. 6(1)(b), (c), (f) GDPR & Art. 22^1 Labor Code	ZUS (Social Security), Tax Office, accounting, IT providers	10 years (employee files) / until recruitment concludes
Project & Statutory Goal Execution	Event participants, beneficiaries, partners	Name, surname, e-mail, phone, institutional affiliation, image	Art. 6(1)(a) (consent) or Art. 6(1)(f) GDPR (legitimate interest)	Sponsors/grantors (reporting), IT service providers	Until consent withdrawal or grant settlement completion
Correspondence & Contact Handling	Contacting persons, counterparties	Name, surname, e-mail, phone number, message content	Art. 6(1)(f) GDPR (legitimate interest — relations)	E-mail & web hosting providers	Until limitation period of potential claims expires (3 years)

Planned Technical and Organizational Security Measures: SSL/TLS connection encryption, named user authorizations, strict access control (passwords min. 12 characters), regular automated backups, clean desk and clean screen policies.

DOCUMENT A2: INDIVIDUAL AUTHORIZATION TO PROCESS PERSONAL DATA

Required under § 3(3) of the Personal Data Protection Policy & Art. 29 GDPR.

Location: **Warsaw**, Date: .... 202_

Authorization No: UPO/RODO/................/202_

Acting on behalf of the Data Controller — **Foundation [Name of Foundation / IPCIM]**, authorization is hereby granted to:

Mr./Ms.: ....

Position / Role: .... *(e.g., Member of Expert Panel / Office Staff / Board Member)*

PESEL / ID Number: ....

To process personal data on behalf of the Foundation within the following scope:

- **Access to personal data processing areas:** *[e.g., Expert Panels, IT Systems, HR Documentation]*;
- **Scope of activities:** inspection, entry, modification, archiving, erasure — solely for the purpose of executing official/statutory duties.

This authorization is issued for the duration of: *[contract term / tenure of role]*. It expires automatically upon termination of the contract or revocation from office.

Signature of Authorizing Person (Management Board / ADO)	Acknowledgment of Receipt (Authorized Person)

DOCUMENT A3: NON-DISCLOSURE & CONFIDENTIALITY STATEMENT

Pursuant to § 3(3) of the GDPR Policy and § 3(3) of the Expert Panel Regulations.

I, the undersigned ...., holding ID / PESEL No.: ...., in connection with performing tasks/duties for the Foundation **[Name of Foundation / IPCIM]**, hereby declare that:

1. I undertake to maintain strict confidentiality regarding all personal data and confidential information to which I gain access during my cooperation with the Foundation.
2. I undertake not to use confidential information or personal data for purposes other than the proper execution of assigned statutory or contractual tasks.
3. I undertake to comply with GDPR regulations and internal data protection policies and regulations in force at the Foundation.
4. I acknowledge that the obligation of confidentiality remains effective indefinitely, including after the expiration or termination of the legal relationship connecting me with the Foundation.
5. I am fully aware of the legal liability (criminal, civil, and labor/contractual) for violating information secrecy and data protection laws.

Date and Legible Signature of Declarant

PART B: GOVERNANCE & SUPERVISORY BODIES

Document B1: Regulations of the Foundation Council

Adopted pursuant to the Articles of Association to specify the procedure of work and convening of Council meetings.

§ 1. General Provisions

1. The Foundation Council (hereinafter referred to as the "Council") is the decision-making, supervisory, and advisory body of the Foundation.
2. The Council operates on the basis of the Act of 6 April 1984 on Foundations, the Articles of Association, and these Regulations.

§ 2. Composition and Appointment

1. The Council consists of 3 to 7 members appointed and dismissed in accordance with the Articles of Association.
2. Council members elect from among themselves the Chairperson of the Foundation Council, who directs the Council's work, convenes its meetings, and presides over them.
3. Membership in the Council expires upon dismissal, death, written resignation, or final judicial conviction for an intentional crime.

§ 3. Competencies and Tasks of the Council

The exclusive competencies of the Foundation Council include:

- Supervision over the overall activities of the Foundation and its Management Board in all operational areas;
- Reviewing and approving annual substantive and financial reports presented by the Management Board;
- Granting members of the Management Board a vote of approval (discharge) for the performance of their duties;
- Providing opinions on multi-year action plans and strategic development directions of the Foundation;
- Adopting resolutions on matters specified in the Articles of Association.

§ 4. Convening Meetings and Order of Business

1. Council meetings take place as needed, but at least once per calendar year.
2. Meetings are convened by the Chairperson on their own initiative, at the request of the Management Board, or upon request of at least 2 Council members.
3. Notice of a meeting, together with the proposed agenda and materials, is sent via electronic mail at least 7 days prior to the planned meeting date.
4. Council meetings may be held using electronic communication means (remote or hybrid mode).

§ 5. Adoption of Resolutions

1. The Council adopts resolutions at meetings by a simple majority of votes in the presence of at least half of its members (quorum), unless the Articles of Association state otherwise.
2. In the event of a tie vote, the Chairperson of the Council holds the casting vote.
3. The Council may also adopt resolutions via written/circular mode (in writing or via e-mail), provided all Council members consent to this voting procedure.
4. Minutes are taken for every Council meeting, signed by the Chairperson and the minute-taker.

PART C: REMUNERATION AND EMPLOYMENT

Document C1: Remuneration Regulations and Compensation Policy

Drafted pursuant to the Labor Code, Act on Foundations, and Expert Panel Regulations.

§ 1. General Principles

1. These Regulations specify the rules and conditions for work remuneration and other benefits for employees, board members, directors, and expert collaborators of the Foundation.
2. Remuneration rates are set at levels corresponding to the type of work performed, qualifications, and workload, maintaining principles of financial rationality and stewardship.

§ 2. Employee and Director Remuneration

1. Employees hired under employment contracts are entitled to a base salary specified in their employment contract.
2. The minimum salary level cannot be lower than the statutory minimum wage established under separate regulations.
3. Salaries are paid in arrears by the 10th day of the following calendar month to the employee's bank account.

§ 3. Remuneration of Experts and Expert Panel Members

1. Remuneration for experts delivering legal opinions, substantive reports, and expert analyses is established based on civil law contracts (contract for specific work with copyright assignment, mandate contract) or B2B contracts.
2. The expert remuneration rate is determined based on:
   - Complexity of the subject matter and required level of specialization;
   - Scope and time required to prepare the study/report;
   - Budget of the specific project/grant approved by the Management Board.
3. Payment of expert remuneration is contingent upon a signed acceptance protocol for the work/report approved by the Chairperson of the Expert Panel or the Management Board.

Document C2: Anti-Mobbing and Anti-Discrimination Procedure

Drafted on the basis of Art. 94^3 of the Polish Labor Code.

§ 1. Purpose and Scope

1. The purpose of this procedure is to promote a safe work environment free from mobbing, discrimination, harassment, and other forms of psychological violence.
2. This procedure applies to all employees, associates, interns, and experts of the Foundation.

§ 2. Definitions

1. **Mobbing:** Actions or behaviors relating to an employee or directed against an employee consisting of persistent and long-term harassment or intimidation, causing a reduced evaluation of professional suitability, causing or intended to cause humiliation, ridicule, isolation, or elimination from the team.
2. **Discrimination:** Unequal treatment in employment based on gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, creed, or sexual orientation.

§ 3. Reporting Violations and Investigation Committee

1. Any person who believes they have been subjected to mobbing or discrimination has the right to report this fact in writing to the Management Board or the designated Ethics Officer.
2. To investigate the report, the Management Board within 14 days appoints an Internal Investigation Committee consisting of 3 impartial individuals.
3. Proceedings before the Committee are confidential. The Committee hears the complainant, the accused person, and witnesses, and issues an opinion and recommendations for the Board within 21 days.

PART D: OPERATIONAL PROCEDURES & COMMERCIAL ACTIVITY

DOCUMENT D1: RESOLUTION OF THE MANAGEMENT BOARD ON COMMERCIAL ACTIVITY

Pursuant to § 3(f) of the Board Regulations and Section III of the Foundation's Substantive Report.

RESOLUTION OF THE MANAGEMENT BOARD NO. ___ / 202_
dated ____________ 202_

on the rules and scope of commercial activity conducted by the Foundation

Acting under the Articles of Association of the Foundation and § 3(f) of the Management Board Regulations, the Board hereby resolves as follows:

§ 1

1. It is hereby confirmed / initiated that the Foundation conducts business/commercial activity in scale serving the achievement of its statutory goals.
2. The scope of commercial activity includes the following PKD codes: *[e.g., 58.11.Z Book publishing, 70.22.Z Business & management consultancy, 72.20.Z Social sciences research]*.

§ 2

1. Commercial activity of the Foundation constitutes an auxiliary activity, separated in terms of accounting and organization from its non-profit and fee-for-service statutory activities.
2. Total income (net profit) from commercial activity is allocated exclusively to the fulfillment of the statutory goals of the Foundation and is not subject to distribution among board members or employees.

§ 3

Execution of this resolution is entrusted to the President of the Management Board.

§ 4

This resolution enters into force on the day of adoption.

______________________________	______________________________
President of the Management Board	Member of the Management Board

Document D2: Instruction for Workflow of Financial-Accounting Documents & Archiving

Drafted on the basis of the Accounting Act and § 4 of the Expert Panel Regulations.

1. Verification and Acceptance of Accounting Vouchers

1. Every accounting voucher (invoice, bill, contract, fee statement) entering the Foundation must undergo substantive, formal, and arithmetical control.
2. **Substantive control:** involves verifying the accuracy of the described economic event, compliance with the contract/ project budget, and alignment with statutory goals. Conducted by the Project Manager or Expert Panel Chair.
3. **Formal and arithmetical control:** involves checking completeness of vendor data, dates, mathematical accuracy, and compliance with VAT/income tax laws. Conducted by the Chief Accountant / Accounting Office.
4. **Approval for payment:** granted by two members of the Management Board authorized to represent the Foundation.

2. Description of Accounting Vouchers (Substantive Stamp)

The endorsement on the reverse side of invoices/bills must include: project name/statutory task, funding source, confirmation of service execution/delivery, procurement mode, and signatures of reviewing personnel.

3. Rules for Archiving Expert and Financial Documentation

1. All accounting records, civil contracts, expert report acceptance protocols, and operational reports are archived at the Foundation's registered office or designated external archive under secure conditions.
2. **Retention Periods:**
   - Financial and accounting documentation & expert fee vouchers: at least 5 years from the end of the calendar year in which the tax payment deadline expired;
   - Grant / EU project documentation: in accordance with grant agreement terms (typically 5 to 10 years);
   - Personnel & employee files: 10 years from the end of the calendar year in which employment ended.
3. Upon expiration of retention periods, documentation undergoes secure destruction/disposal in accordance with data sanitization standards.