

CODE OF CONDUCT

AUGUST 2025

INTRODUCTION

Free To Shine's Employment Code of Conduct sets the standard for ethical, respectful, and professional behaviour for everyone working with our organisation. This Code embodies our commitment to the safety, inclusion, and well-being of all employees, volunteers, partners, beneficiaries, and community members. It has been developed in alignment with Cambodian Labour Law, the Australian Council for International Development (ACFID) Code of Conduct, and the Australian Department of Foreign Affairs and Trade (DFAT) safeguarding requirements.

All board members, employees, students, volunteers, contractors, and partners are expected to uphold these principles and practices in every aspect of their work.

This Code provides clear guidance on conduct expectations, anti-discrimination, safeguarding, use of organisational resources, reporting obligations, and protections for whistleblowers. By following this Code, each individual contributes to a safe, inclusive, and accountable working environment and supports Free To Shine's mission to protect and empower children and communities with integrity and transparency.

SCOPE

Those who fall within the scope below are required to read, sign and adhere to the Free To Shine Code of Conduct.

This policy applies to all Free To Shine 'Employees and Associates' as defined below:

- All Free To Shine employees, whether full-time, part-time, temporary or casual.
- Contractors, consultants, or service providers acting on behalf of Free To Shine.
- All volunteers (office-based, remote, field-based, event-based), interns, and students on placement with Free To Shine.
- All current members of Free To Shine's governing Board.
- Any partner organisations or representatives acting in the name of, or providing services for, Free To Shine.

RESPONSIBLE PARTY

It is the responsibility of the Managing Director and the Country Director to ensure that all new employees and associates are aware of this Code of Conduct and that annual training about this code is conducted.

OBLIGATIONS AND RESPONSIBILITIES

Everyone covered by this scope must:

- Read and familiarise themselves with the Free To Shine Code of Conduct and related policies.
- Sign the Agreement page prior to commencing their work, placement, or engagement.
- Uphold all provisions of the Code at all times when representing Free To Shine or performing associated work or activities.
- Complete all induction and training requirements.
- Immediately report any breaches or concerns using the appropriate channels.
- Foster a safe, positive, and inclusive environment for all, especially children.

CONSEQUENCES

Breaches of this Code may lead to disciplinary action, up to and including dismissal and referral to authorities if required.

By working with Free To Shine, you agree to uphold these standards at all times and contribute to our mission of protecting and empowering children and communities.

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DUTY OF INTEGRITY

All employees and associates must demonstrate honesty, integrity, and professionalism in their work. This includes fostering positive, respectful, and culturally sensitive interactions with colleagues, beneficiaries, their families, and community members. All conduct must uphold the values and reputation of Free To Shine.

PROTECTION OF FREE TO SHINE'S INTERESTS

Employees and associates shall act in the best interests of Free To Shine, protecting the organisation's honour, dignity, and objectives at all times, and supporting its mission to serve children and the community ethically and transparently.

INCLUSION, DIVERSITY AND NON-DISCRIMINATION

Free To Shine is fully committed to building a diverse and inclusive workplace where every individual is respected, supported, and empowered to contribute to our mission. We strictly prohibit discrimination on any basis—including, but not limited to, race, ethnicity, colour, nationality, descent, religion, language, sex, gender, gender identity or expression, sexual orientation, age, marital or family status, political beliefs, union membership, disability, pregnancy, health status, work-related injury, social origin, economic situation, or any other protected characteristic—at every stage of employment and program delivery. We actively foster an environment where equality of opportunity thrives, diversity is celebrated, and harassment, exclusion, or bias of any kind are not tolerated. Free To Shine expects all employees and associates to uphold these standards in all interactions. Any breaches of this commitment to inclusion, diversity, and non-discrimination will be addressed promptly according to our grievance and disciplinary procedures.

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH)

Free To Shine strictly prohibits all forms of sexual harassment, exploitation, and abuse in the workplace and in all organisational activities. Sexual harassment—including unwelcome advances, inappropriate comments, requests for sexual favors, or any conduct of a sexual nature that creates an intimidating, hostile, or offensive work or program environment—will not be tolerated in any Free To Shine context (including virtual or field settings). Sexual exploitation or abuse of any beneficiary, staff, volunteer, or community member is strictly forbidden.

All employees and associates are expected to uphold this standard. Anyone experiencing, witnessing, or aware of sexual harassment, exploitation, or abuse is strongly encouraged and supported to report their concern using Free To Shine's confidential and accessible reporting procedures. All reports will be taken seriously, investigated promptly, and handled discreetly and with strict confidentiality.

The organisation is committed to a survivor-centred response: support, protection, and information will be provided to those affected in accordance with their wishes and needs. Participation in investigations will not result in retaliation or adverse consequences.

All staff, volunteers, and associates must complete regular training on recognising, preventing, and responding to sexual harassment, exploitation, and abuse.

Breaches of this policy will result in disciplinary action, up to and including termination and/or referral to relevant authorities. This includes failure to report concerns, retaliation against reporters, or participating in or failing to prevent PSEAH violations.

CHILD PROTECTION

Free To Shine is fully committed to the safety, well-being, and protection of all children. We maintain a strict zero-tolerance policy towards any form of child abuse, exploitation, or neglect whether physical, emotional, sexual, or psychological in accordance with Cambodian law, the DFAT Child Protection Policy, and the ACFID Code of Conduct.

All employees and associates are required to:

- **Understand and Act:** Abide by Free To Shine's Child Protection Policy and Child Protection Code of Conduct at all times, both inside and outside the workplace.
- **Safe Recruitment and Screening:** All employees, volunteers, contractors, and associates must undergo rigorous recruitment processes, including interviews, reference checks, and police/criminal history checks, before working with children or accessing children's information.
- **Mandatory Training:** Participate in initial and ongoing child protection and safeguarding training as a condition of employment or engagement.
- **Appropriate Behaviour:** Never engage in behaviour that could harm, exploit, abuse, or place a child at risk. All contact with children must be transparent, appropriate, and in line with Free To Shine's safeguarding protocols. Private, unsupervised, or unnecessary contact with children is not permitted.
- **Mandatory Reporting:** Immediately report any suspicion, concern, disclosure, or allegation of child abuse, exploitation, or policy violation—within the organisation or in the community using designated internal reporting channels or directly to designated senior staff. Reports may be made anonymously. Reporting is an obligation for all, and inaction is itself a breach.
- **Confidentiality and Survivor-Centred Approach:** All information related to child protection concerns is to be handled sensitively and confidentially. Responses will prioritise the safety, dignity, and wishes of the child.

Anyone found to have breached the Child Protection Policy, Code of Conduct, or relevant laws will be subject to disciplinary action, up to and including immediate termination and referral to relevant authorities.

All employees and associates share the responsibility to create and maintain a culture of safety, respect, and accountability for the children we work with and for.

PROTECTION FROM WORKPLACE HARASSMENT, BULLYING, AND ABUSE

Free To Shine is committed to maintaining a safe, respectful, and inclusive workplace for all employees, associates and beneficiaries. All forms of workplace harassment, bullying, exploitation, or abuse are strictly prohibited.

Employees and associates must treat everyone they interact with—colleagues, beneficiaries, and other stakeholders—with respect, dignity, and fairness at all times. Free To Shine will take all reports of harassment or abuse seriously and will respond promptly, confidentially, and in line with organisational policies.

Retaliation or victimisation against anyone who raises a concern or participates in an investigation is strictly forbidden and will result in disciplinary action. Free To Shine's procedures ensure that everyone has the right to work and participate in a safe environment, free from discrimination, harassment, or intimidation.

CONFIDENTIALITY

Respecting confidentiality is a fundamental responsibility for everyone at Free To Shine and is essential to safeguarding our beneficiaries, families, and organisational integrity (see the Free to Shine Confidentiality Policy for full information).

What Confidentiality Means

As part of your role, you may access sensitive or private information, such as:

- Personal details of children, families, and colleagues (e.g., names, birth dates, contact information, family background, education, health, financial status).
- Case notes, assessment records, and any information concerning child protection or welfare concerns.

All information collected, accessed, or generated by you through your work or volunteering for Free To Shine must be treated as strictly confidential.

Your Responsibilities

- **Do Not Share:** You must never discuss or disclose any confidential information to anyone outside Free To Shine, including family, friends, or the public.
- **Internal Sharing Only When Needed:** If your role requires you to gather or handle confidential information, you may only discuss it with other authorised Free To Shine employees or associates who need it for their work.
- **Maintain Privacy in Conversations:** Always ensure that discussions about sensitive matters happen in secure, private settings.
 - Never talk about beneficiaries or their families in public places (e.g. cafés, public transport) or where you might be overheard.
 - If you receive a work-related call involving confidential information in a public space, wait until you are in private to continue, or arrange to call back later.

USE OF ORGANISATIONAL PROPERTY AND INFORMATION SYSTEMS

All Free To Shine employees and associates are responsible for using organisational property and information systems—such as computers, phones, internet access, vehicles, documents, and all digital or physical assets—ethically, securely, and solely for official organisational purposes.

- **Authorised Use Only:** Organisational resources must only be used for work directly related to Free To Shine's activities. Personal use is not permitted unless explicitly authorised.
- **Care and Security:** Employees are expected to take reasonable care to prevent loss, damage, misuse, or theft of organisational property. This includes safeguarding passwords, maintaining confidentiality, and adhering to all security protocols.
- **Information Systems:** Use of Free To Shine's email, IT systems, and communications must comply with organisational policies and applicable laws. Accessing, storing, or sharing inappropriate, illegal, or personal material on these systems is strictly prohibited.
- **Return of Property:** All organisational items—including uniforms, phones, laptops, and identification—must be returned promptly at the end of employment or engagement.
- **Confidentiality:** Employees must not disclose, copy, transfer, or use any Free To Shine confidential or proprietary information outside the organisation unless expressly authorised, and always in line with Free To Shine's confidentiality and data protection policies.
- **Organisation-Owned Materials:** All documents, forms, resources, and materials belong to Free To Shine and may only be used for official work. Projects and initiatives may not be copied, distributed, used outside Free To Shine, or reproduced under another name.

Misuse of organisational property or information systems—including unauthorised access, use, or disclosure of information—violates this policy and may result in disciplinary action, up to and including termination, or reporting to authorities as required by law.

COMMUNICATION AND MEDIA

Effective communication is an important part of representing Free To Shine. Communication refers to both external communication (with the public through media, promotional material, conversations and fundraising), as well as internal communications (with each other and keeping everyone informed).

- Employees must not talk to the media without prior approval from the Managing Director.
- Anything with the Free To Shine logo, or name, must be approved by the Country Director or Managing Director before being printed or distributed.
- Employees may be issued a work phone to make and receive work related calls during work hours. The phone is not to be used outside of working hours, except with explicit permission of the Program Manager or Country Director. Free To Shine's program beneficiaries are not to be given employees' personal contact details.
- All communication with families and children is to be respectful and professional at all times. Communication with beneficiaries and their families is not permitted outside work hours except in exceptional circumstances. The employee must notify the Program Manager either before the contact, if it is planned, or as soon as possible after this has occurred and with explanation.

- Emails and voicemails should be responded to within 48 hours, except for in extenuating circumstances.
- Free To Shine employees and associates should not use their personal social media accounts for contact with beneficiaries or families or any parties they contact for work purposes. Where directed, employees may be expected to set up a social media account (Facebook) explicitly for work purposes and this should be deleted upon termination of employment with Free To Shine.

PUNCTUALITY

All Free To Shine employees, students and volunteers are expected to be at work during the Free To Shine working hours of 8:00am to 12:00pm and from 1:00pm to 5:00pm, Monday through Friday. Any late arrivals, early departures, or absences must be communicated and approved by the relevant supervisor.

DRESS CODE

All employees and associates must wear clean, neat, and appropriate clothing suitable for their role and in accordance with Free To Shine's standards. Uniforms are provided for in-country field employees and must be worn during fieldwork or while representing Free To Shine externally. Uniforms are Free To Shine's property and must only be used for work purposes, and returned upon cessation of employment.

PARTICIPATION AND COMMUNICATION

Active participation in scheduled team meetings, individual supervision, and collaborative activities is required to ensure communication, transparency, and accountability within the team and in service delivery to beneficiaries.

PROFESSIONAL AND PERSONAL DEVELOPMENT

Free To Shine's role is to be a supportive facilitator. The employee is responsible for managing their own development within their duties and responsibilities. Free To Shine may require employees to attend specific training or instruction. Development may take the form of training, education, mentoring, coaching or counselling.

ADHERENCE TO MANAGEMENT DIRECTIONS

All team members must promptly follow lawful, reasonable, and urgent instructions from the Management Team and cooperate in achieving organisational goals, ensuring these actions respect the rights and dignity of all stakeholders.

ALCOHOL, DRUGS AND SUBSTANCE MISUSE

Free To Shine maintains a strict zero-tolerance policy regarding the use of illicit drugs or alcohol in the workplace. Employees and associates are not permitted to consume, possess, or be under the influence of alcohol or illegal substances during work hours, when using Free To Shine vehicles, on organisational premises, or while representing Free To Shine in any capacity.

Attending work or driving under the influence of alcohol or drugs is strictly prohibited and may result in disciplinary action, including immediate dismissal. Driving under the influence is also illegal, and it is your personal responsibility to comply with the law at all times.

Free To Shine is committed to a safe, healthy, and productive environment for all employees, beneficiaries, and especially children. We recognise that alcohol or drug misuse impairs job performance and endangers the wellbeing of employees, children, and the wider community.

All employees are expected to set a positive example and contribute to a secure and healthy environment, both in the workplace and in all community interactions. If you have concerns or require support related to alcohol or substance misuse, you are encouraged to seek assistance from management or relevant support services.

GIFTS

Free To Shine recognises that gifts and donations, whether from individuals or businesses, may be intended to support children and the community. To ensure transparency, integrity, and alignment with our safeguarding obligations:

- **Approval Before Distribution:** A detailed description of any gift intended for beneficiaries must be provided to the Country Director or Managing Director for approval before the gift is distributed.
- **Monetary Donations:** Monetary donations must never be given directly to beneficiaries under any circumstances. All financial gifts are managed through official Free To Shine channels.
- **Gifts to Employees:** If any employee receives a gift from a beneficiary, donor, or any other party, it must be immediately disclosed to the Country Director. The Country Director will determine the appropriate response, in line with organisational policy.
- **Record Keeping:** All gifts and donations must be recorded and tracked to ensure compliance and prevent conflicts of interest or undue influence.

ANTI-CORRUPTION

Free To Shine strictly prohibits all forms of corruption, bribery, and solicitation of informal payments or unofficial payments.

- **Strict Prohibition:** No employee, volunteer, contractor, or partner may offer, solicit, or accept bribes or unofficial payments in any form. This includes gifts, money, favours, or other benefits intended to secure improper advantage or influence decisions.
- **No Charges to Beneficiaries:** All Free To Shine services for children are provided free of charge. Soliciting or accepting money from any beneficiary or their family, directly or indirectly, is strictly forbidden and will result in immediate dismissal.
- **Mandatory Reporting:** Any suspicion, offer, or request for bribes, unofficial payments, or corrupt conduct must be reported immediately to management, either directly or through your supervisor, for prompt investigation.
- **Accountability:** Breaches of this policy will result in disciplinary action, up to and including termination and, where necessary, referral to relevant authorities.

WHISTLEBLOWING AND ANTI-RETALIATION STATEMENT

Free To Shine is committed to maintaining the highest standards of integrity, accountability, and transparency. To ensure a safe and ethical workplace, all employees, and associates are encouraged—and have the right—to report any concerns about suspected wrongdoing, misconduct, breaches of the Code of Conduct, illegal activities, or violations of Free To Shine's policies, including those relating to child protection, corruption, harassment, discrimination, or workplace safety.

Right to Report

- Any individual may raise concerns or make a report in good faith through designated internal channels or confidential reporting mechanisms, without fear of reprisal.
- Whistleblowing may be done anonymously if desired, and all reports will be handled promptly and sensitively.

Protection from Retaliation

- Free To Shine strictly prohibits any form of retaliation, discrimination, intimidation, or adverse action against anyone who, in good faith, reports a concern, participates in an investigation, or provides information regarding a suspected violation.
- This protection extends to persons assisting others in raising concerns and to witnesses involved in follow-up actions or investigations.

Handling of Reports

- All reports will be treated seriously, investigated thoroughly, and kept as confidential as possible, consistent with the need for a fair process and in accordance with organisation policy and applicable law.
- Appropriate support will be made available for individuals who report concerns or participate in investigations.
- Retaliatory behaviour is a serious disciplinary offence and will result in consequences up to and including dismissal.

CONFLICT OF INTEREST

Free To Shine is committed to ensuring transparency, fairness, and integrity in all decision-making processes and activities. Employees and associates must avoid situations where their personal interests could conflict, or appear to conflict, with the interests of Free To Shine, its beneficiaries, or its mission.

A conflict of interest occurs when personal, financial, or other outside interests could improperly influence—or be perceived to influence—professional decisions or actions. Examples include, but are not limited to:

- Having a financial or personal relationship with a vendor, partner, beneficiary, or other external parties that may benefit from organisational decisions.
- Working, consulting, or holding a position with another organisation whose interests may conflict with those of Free To Shine.
- Providing preferential treatment to family members or close associates in hiring, procurement, or program decisions.
- Using Free To Shine property, confidential information, or opportunities for personal gain.

Responsibilities

- Disclosure: All employees and associates must promptly disclose any actual, potential, or perceived conflict of interest to their supervisor, manager, or the designated compliance officer.
- Recusal: Individuals must remove themselves from any decision-making, assessment, or approval process where a conflict exists.
- Transparency: Declarations of conflict of interest will be documented and managed according to Free To Shine's procedures to ensure that organisational integrity is preserved.

Upon disclosure, Free To Shine will assess the situation and determine appropriate actions, which may include additional oversight, reassignment of duties, or, in some cases, withdrawal from specific activities.

Failure to declare or appropriately manage a conflict of interest may result in disciplinary action, up to and including termination, and may be reportable to relevant authorities in line with organisational and legal obligations.

COMPLAINTS AND GRIEVANCES

Free To Shine upholds the right of every employee to raise a grievance if they believe a decision, action, or behaviour has unfairly affected their employment. Employees are encouraged to submit concerns to their immediate supervisor. Supervisors must report all grievances to the Management Team, which is responsible for reviewing and addressing complaints promptly, impartially, and with discretion.

The Management Team will seek to resolve grievances in a fair and timely manner, escalating issues to higher levels of the organisation as necessary. All grievances will be handled confidentially and without retaliation, in line with Free To Shine's commitment to a safe and respectful workplace and international best practice standards.

COMPLIANCE, ACCOUNTABILITY, AND BREACHES

Everyone associated with Free To Shine is responsible for upholding this Code of Conduct and fostering a workplace culture where concerns can be raised safely and addressed with integrity. All employees and associates are accountable for their actions and expected to contribute to a safe, respectful, and effective work environment at all times.

Breaches or alleged breaches of this Code will be addressed promptly, confidentially, and fairly through Free To Shine's grievance and disciplinary procedures, in accordance with legal requirements. Individuals who, in good faith, report concerns or suspected violations—using correct reporting procedures—will be protected from retaliation or disadvantage.

All reported breaches will be thoroughly investigated, maintaining confidentiality and due process. Disciplinary action, up to and including termination or referral to authorities, may result from violations of this Code or related policies.