



Empower with an education to prevent sex trafficking

CODE OF CONDUCT

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1. INTRODUCTION

Free To Shine (FTS) is committed to the highest standards of ethical and professional conduct in all our work, and to fostering a safe, respectful, and inclusive environment. This Code of Conduct should be read in conjunction with the relevant Employment Policy applicable to your country of employment. FTS maintains two Employment Policies, each applicable based on the employee's country of employment, and both require adherence to this Code of Conduct. It should also be read together with the Child Protection Policy, Protection from Sexual Exploitation, Abuse and Harassment Policy, Confidentiality Policy, and Whistleblower Policy.

This Code of Conduct sets the standard for ethical, respectful, and professional behaviour for everyone working with our organisation. It 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's (ACFID) Code of Conduct, and the Australian Department of Foreign Affairs and Trade (DFAT) safeguarding requirements.

This Code sets out the principles and standards of behaviour all FTS employees and associates are required to adhere to in every aspect of their work.

2. SCOPE

This Code applies to all Free To Shine (FTS) *'Employees and Associates'* as defined below:

- All members of FTS's governing Board.
- All FTS employees, whether full-time, part-time, or casual.
- All volunteers (office-based, field-based, event-based), interns, and students on placement with FTS.
- Contractors, consultants, or service providers acting on behalf of FTS.
- Any organisations working in partnership with FTS.
- Any representatives acting in the name of FTS.
- Any visitors.

This policy applies to all Free To Shine (FTS) *'Employees and Associates'*

- In the workplace or office environment.
- During work-related events, meetings, travel, or activities.
- In interactions with the people FTS serves, communities, partners, and other stakeholders.
- In online and digital spaces, including emails, messages, social media, audio or video calls, online meetings, and voice notes.
- In all professional and personal contexts, including outside of work hours and settings.

3. RESPONSIBLE PARTIES

The Managing Director and Country Director are responsible for ensuring all employees and associates are informed about this code of conduct, and that annual training is provided on this code of conduct.

Every person covered must know and follow this Code of Conduct at all times, across all FTS

activities, in Cambodia, Australia, or any other country where we operate. All Employees and Associates must:

- Read and familiarise themselves with the FTS Code of Conduct and related policies.
- Comply with and uphold the provisions of the Code at all times when representing FTS or performing associated work or activities.
- Complete all required induction and training requirements.
- Promptly report any breaches or concerns using designated reporting channels.
- Contribute to and promote a safe, positive, and inclusive environment for all, especially children.

4. CONSEQUENCES

Breaches of this Code will result in disciplinary action, including possible dismissal and referral to authorities. By engaging with FTS, all individuals agree to uphold these standards at all times, contributing to the protection and empowerment of children and communities.

5. DUTY OF INTEGRITY

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

6. PROTECTION OF FREE TO SHINE'S INTERESTS

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

7. INCLUSION, DIVERSITY AND NON-DISCRIMINATION

FTS is 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 equity of opportunity thrives, diversity is celebrated, and harassment, exclusion, or bias of any kind are not tolerated. FTS requires 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.

8. PROTECTION FROM SEXUAL HARASSMENT, EXPLOITATION, AND ABUSE (PSEAH)

All employees and associates must uphold FTS's zero-tolerance approach to sexual harassment, exploitation, and abuse. Everyone is required to understand and follow the principles, responsibilities, and standards of behaviour set out in FTS's Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy at all times, in all work-related contexts (including online and in the community).

9. CHILD PROTECTION

All employees and associates share responsibility for ensuring the safety and well-being of children. Everyone is required to understand and strictly follow the principles, responsibilities, and standards of behaviour outlined in FTS's Child Protection Policy, in all interactions with children and in any work that may affect them.

10. PROTECTION FROM WORKPLACE HARASSMENT, BULLYING, AND ABUSE

FTS 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. FTS 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. FTS's procedures ensure that everyone has the right to work and participate in a safe environment, free from discrimination, harassment, or intimidation.

11. CONFIDENTIALITY

All employees and associates must protect the confidentiality of information obtained through their work with FTS. This includes, but is not limited to, information about beneficiaries and their families, colleagues, donors, partners, organisational operations, finances, and any other sensitive or proprietary data.

Confidential information must only be accessed, used, or shared when it is necessary for legitimate work purposes and authorised by FTS. It must never be disclosed to unauthorised persons, used for personal gain, or discussed in public or insecure settings (including online, social media, or informal conversations).

These obligations continue after employment or engagement with FTS ends. All employees and associates must comply with FTS's Confidentiality Policy.

12. USE OF ORGANISATIONAL PROPERTY AND INFORMATION SYSTEMS

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

- **Authorised Use Only:** Organisational resources must only be used for work directly related to FTS'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 FTS'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 FTS confidential or proprietary information outside the organisation unless expressly authorised, and always in line with FTS's confidentiality and data protection policies.
- Organisation-Owned Materials: All documents, forms, resources, and materials belong to FTS and may only be used for official work. Projects and initiatives may not be copied, distributed, used outside FTS, 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.

13. COMMUNICATION - INTERNAL AND EXTERNAL

All employees and associates are expected to communicate in a clear, honest, and respectful manner, in line with FTS's Code of Conduct. Effective internal and external communication is essential for safeguarding children and promoting their wellbeing.

Internal communication: Employees and associates must share critical information accurately and promptly, coordinate support effectively, and respond quickly to concerns. Clear communication ensures that the organisation can act decisively to protect children and uphold professional standards.

External communication: When interacting with families, community partners, other agencies, donors, or the media, employees and associates must communicate openly and transparently. This builds trust, strengthens collaboration, and ensures children receive appropriate support. It also ensures the organisation's reputation, programs, and child protection commitments are accurately represented.

Strong communication across all contexts is a shared responsibility that helps FTS maintain a united approach to safeguarding children and promoting their wellbeing.

- Employees must not talk to the media without prior approval from the Managing Director.
- Anything with the FTS name or logo 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.
- 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.
- Important or urgent emails and voicemails should be responded to within 48 hours, and all contact by beneficiaries or families is considered important. Other emails and voicemails should be responded to within 5 days. Marketing and spam emails do not need to be responded to.

- FTS 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. Some employees may be required to set up a social media account explicitly for work purposes, and this should be deleted upon termination of employment with FTS.
- FTS's program beneficiaries are not to be given employees' personal contact details.

14. PUNCTUALITY

All FTS employees are expected to be punctual and comply with the Employment Policy that applies to their country of work. This includes being on time for scheduled working hours and informing your supervisor of any planned or unplanned absences. Any late arrivals, early departures, or absences must be communicated to and approved by the relevant supervisor.

15. DRESS CODE

All employees and associates are expected to wear clean, neat, and appropriate clothing suitable for their role. Where uniforms are provided by FTS, they must be worn during fieldwork and, when required, while representing FTS externally. Uniforms remain the property of the organisation, must be used only for work purposes, and should be returned at the end of employment.

16. PARTICIPATION

All employees are expected to actively participate in team meetings, supervision sessions, training and collaborative activities. Active engagement supports clear communication, transparency, accountability and professional standards. This directly contributes to the delivery of safe, effective, and high-quality services for all beneficiaries.

17. PROFESSIONAL AND PERSONAL DEVELOPMENT

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

18. ADHERENCE TO MANAGEMENT DIRECTIONS

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

19. ALCOHOL, DRUGS & SUBSTANCE MISUSE

FTS 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.

FTS maintains a strict zero-tolerance policy regarding the use of illicit drugs or alcohol in the workplace. All employees are expected to set a positive example and help maintain a safe and healthy environment, both in the workplace and during interactions with the community.

Employees must not consume, possess, or be under the influence of alcohol or illegal substances during work hours, on organisational premises, when using FTS vehicles, or while representing FTS.

Attending work or operating any FTS vehicle under the influence of alcohol or drugs is strictly prohibited and may result in disciplinary action up to and including immediate dismissal.

All employees and associates are responsible for complying with local drug and alcohol laws at all times.

There may be occasions where employees are required to represent FTS at speaking engagements, fundraising events or in other social settings, outside of standard work hours, where alcohol is being consumed. It is acceptable in these circumstances, after completing official business, to consume some alcohol responsibly. Intoxication is prohibited.

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.

20. GIFTS

FTS 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 FTS 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.

21. ANTI-CORRUPTION

FTS strictly prohibits all forms of corruption, bribery, and solicitation of informal payments or unofficial payments.

- **Strict Prohibition:** No employee or associate 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 FTS 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.

22. FRAUD AND THEFT

FTS strictly prohibits all forms of fraud, theft, and financial misconduct. This includes, but is not limited to, theft of monies, equipment, intellectual property, confidential information, misuse of company funds or credit cards, falsification of expense claims or financial records, timesheet manipulation, vendor or invoice fraud, and collusion with third parties.

Attempted fraud or theft is treated as seriously as completed acts.

All employees and associates are required to adhere to the principles and expected standards of behaviour detailed in FTS's Financial Policy. Any suspected misconduct must be reported immediately. Breaches may result in disciplinary action up to and including termination of employment, recovery of losses, and referral to relevant authorities as per the Employment policy.

23. WHISTLEBLOWING AND GOOD FAITH REPORTS

FTS is committed to the highest standards of integrity, accountability, and child safeguarding. We encourage and protect people who speak up about suspected wrongdoing connected to FTS's work. Everyone is required to understand and follow the principles outlined in the Whistleblower Policy.

24. CONFLICT OF INTEREST

FTS 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 FTS, 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 FTS.
- Providing preferential treatment to family members or close associates in hiring, procurement, or program decisions.
- Using FTS 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 FTS's procedures to ensure that organisational integrity is preserved.

Upon disclosure, FTS 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.

25. COMPLIANCE, ACCOUNTABILITY, AND BREACHES

All employees and associates of FTS are 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 FTS'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.

Revision Log

Version	Date	Summary of Changes	Author
1	2019	Initial policy release	Nicky Mih, Managing Director
2	2020	Inclusion of volunteers	Georgia Morrison, Board Member
3	August 2026	Major review of content, and style	Sarah Rogers, Country Director
4	March 2026	Major review and rewrite; consideration of compliance with ACFID and DFAT regulations	Sarah Rogers, Country Director
4.1	March 2026	Addition of Document Control and Revision Log tables	Sharon Allen, Board Secretary