



RIGHT TO PLAY
PROTECT. EDUCATE. EMPOWER.

Right To Play International Code of Conduct

Version #003

Department: People & Culture	Position Accountable: Chief People Officer
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Introduction

Purpose

Right To Play’s International Code of Conduct is our foundation for having a positive impact and delivering on our mission. It helps to educate and empower everyone across Right To Play International to understand the responsibilities we have.

The purpose of this policy is to outline the highest standards of behaviours based on the ethical, operational, legal, safeguarding, and organizational parameters to ensure that all parties covered under this policy treats each other and the children, youth, and communities we work with, with dignity and respect, that we act in a way that supports a safe and inclusive workplace and that any violations of this policy are appropriately addressed in a timely manner.

The document will not cover every situation we will face in our daily work, but the Code of Conduct should be our first reference point when facing an unclear or difficult decision.

Scope and Principles

This policy applies to all Right To Play Employees, Volunteers, Interns, Consultants, and representatives* (hereinafter collectively referred to as “Team Members”) working with Right To Play International and its National Offices, Country Offices, and Headquarters (hereinafter collectively referred to as “Right To Play”). We are all expected to uphold the Code of Conduct as these principles are at the core of how we work together and deliver on our mission, and how we are held accountable for living our values principles. All Right To Players—from leaders to interns— must abide by and uphold the Code. Violations may result in disciplinary action, up to and including termination of employment or assignment.

The Code of Conduct is grounded in the Right To Play [Culture Code](#) principles: accept everyone, make things happen, display courage, demonstrate care, and be playful. The scope of this policy is deeply connected to our commitment to Diversity, Equity, and Inclusion. The Culture Code is the basis for how we interact with each other, beneficiaries, partners, and other external parties. Right to Play is committed to actively supporting diversity, equity, and inclusion as an important contributor to staff well-being. Right To Play is committed to fostering a working environment where all individuals feel safe and supported irrespective of race, gender, religion, sexual orientation, ethnicity, nationality, socioeconomic status, language, (dis)ability, age, religious commitment, or political perspective.

** Representative means any person who is acting on behalf of Right To Play.*

Distribution

Right To Play will provide all Team Members with a copy of this Code. The Team Member’s supervisor will answer any questions as to the Code’s application to the area of responsibility and authority of the Team Member to ensure a proper understanding of the Code.

At commencement of employment and at least once a year thereafter, each Team Member signs the prescribed form of acknowledgment. The People and Culture representative will retain this form and confirm annually to

senior management that each Team Member at the location has completed the required form. This confirmation acknowledges that the Team Member has read or reread the current version of the Code of Conduct.

In addition, in cases where, as an alternative to employment, an individual:

- Is engaged under contract to provide services to the organization
- Has managerial or supervisory responsibilities, or
- Deals on the organization's behalf with government officials, or
- Has access to confidential information

Such individuals will be provided with a copy of this Code and shall sign the prescribed form of acknowledgment. In connection with the provision of services to the organization, this Code shall apply to such individuals fully as if they were a Team Member of Right To Play.

Responsibilities and Supporting One Another

Duty to Uphold the Code of Conduct

It is the responsibility of all Team Members to ensure that their behaviour consistently meets the standards of this Code of Conduct and to report any breaches as they arise. Team Members can report breaches of the Code of Conduct to any member of Management, the Global Leadership Team, the People and Culture Team or anyone they feel comfortable reporting to. The person you report to will be expected to escalate the issue to any member of the P&C (People & Culture) team who will escalate accordingly.

Team Members can also report breaches of the code of conduct through a confidential secure website at www.clearviewconnects.com. Team Members who are found to have breached this Code of Conduct would be subject to disciplinary action including and up to termination of employment or partnership agreement.

Reporting a Violation of the Code of Conduct

Right To Play has a world-wide critical incident confidential reporting system through ClearView Strategic Partners Inc. This web-based system instantly provides critical incident data to key decision-makers in headquarters and in the respective offices. The system time stamps all reporting as it is logged into the system. Authorized Team members can then extract information to oversee and manage the confidential investigations and actions.

Right To Play expects any Team Member who becomes aware of a violation of the Code to exercise their contractual obligation and duty of care and report that information immediately:

- To Management and/or People and Culture or
- Online through a confidential secure website at www.clearviewconnects.com, or
- Canada or USA: over the phone through the Right to Play Canada/US dedicated toll-free number: 1-866-921-3463, or
- All Other countries: over the phone through the Right to Play International Collect Call number: +1 905-323-4617, or
- By mail through the confidential post office box at:
P.O. Box 11017

Toronto, Ontario
M1E 1N0

The accountable manager will review the information and initiate an investigation as required.

It is considered gross misconduct and violation of this Code to discriminate or retaliate against Team Members for reporting such information. It is also considered gross misconduct and violation of this Code to report malicious, reckless, or knowingly false statements or allegations.

Standards of Behavior

As a Team Member at Right To Play, one agrees to always abide by the International Code of Conduct within and outside of the workplace. This means upholding and promoting the highest ethical and professional standards, Team Members shall:

- Respect and promote fundamental human rights without discrimination and act with integrity.
- Respect and abide by national and international laws.
- Treat all communities that Right To Play seeks to assist (including crisis-affected populations, internally displaced persons, and refugees), fairly and with respect, courtesy, dignity and according to international laws and a do no harm standard.
- Positively represent Right To Play.
- Maintain an environment that prevents misconduct and promotes the implementation of this Code of Conduct. Managers at all levels have responsibility to support and develop systems that maintain this environment.
- Report immediately any knowledge, concerns, or substantial suspicions of breaches of this Code of Conduct to your line manager, People & Culture or via Right To Play's [Whistleblower Policy](#). Be aware that failure to disclose or knowingly withholding information about any reports, concerns, or substantial suspicions of breaches of this Code of Conduct constitutes grounds for disciplinary measures.
- Promote safe and confidential reporting of serious concerns about suspected misconduct following Right To Play's [Whistleblower Policy](#).
- Cooperate when requested with any investigation into alleged breaches related to this Code of Conduct.

Any breach of this Code of Conduct is a form of misconduct, and, if substantiated, will lead to disciplinary measures up to and including termination of employment and/or legal action if required.

Harm to People and Property

Team Members must adhere to the policy of Right To Play which is to provide a work environment in all of our 'workplaces' including offices, program sites, and other, that free of violence, discrimination and harassment in which individuals are accorded dignity and equality of employment opportunities based upon merit and ability.

Right To Play will not tolerate discriminatory practices based on any ground protected by applicable human rights laws which may include but may not be limited to: race, sex, colour, national or ethnic origin, religion,

marital status, family status, age, sexual orientation, disability, ancestry, citizenship, creed, record of offences or any other characteristic protected by applicable legislation. Team Members are entitled to freedom from sexual solicitation and harassment as well as all other forms of harassment in the workplace.

The majority of the Code of Conduct will cover harmful and prohibited practices. It is important to distinguish these expectations from other instances that may arise where we rely on judgement and labour law standards to guide us. For example, it is not a discriminatory practice to make a distinction between persons based on bona fide occupational requirements (e.g., a driver requires a Driver's License, and cannot be appointed without one). Since bona fide occupational requirements are narrowly defined, Team Members should not undertake such distinctions without first obtaining express authorization from Management or People & Culture. It is not deemed harassment for supervisors to manage the performance of employees through the appropriate performance management processes and People & Culture can provide guidance in these cases.

Right To Play will not tolerate verbal or physical, or online attack on a colleague or any other person within the working environment. Team Members must not abuse any property, premise, equipment, or inventory through carelessness. Right To Play will not tolerate any purposeful vandalism or damage to any property or premise or sabotage of processes, operations, or events. Right To Play requires Team Members to exercise reasonable care when using property and equipment and in conducting the work of the organization.

Health and Safety of Self and Others

Team Members of Right To Play must ensure that dangerous or potentially dangerous situations, conditions or practices are identified and discontinued, such as those which might affect the health or safety of other employees, customers, suppliers, contractors, visitors, or neighbours.

All Team Members must use a preventative approach to health and safety. Each Team Member is responsible for regular workplace health and safety inspections. Each must report unsafe conditions or practices to Management. Each team member must fully document and report in writing to Management any workplace health and safety incidents. Team members must adhere to any organizational specific policies and procedures put in place to address specific health and safety concerns whether permanent or temporary.

These procedures also apply to items both on the organization's property (e.g., dangerous workplace, equipment, or practices) and off the organization's property (e.g., unsafe driving practices by organization's drivers or failure to adequately secure loads on trucks).

Travel is a vital component of RTP's work and allows for the delivery of important programmatic and organizational support whether in country or globally RTP believes that to mitigate risk to each person working or travelling with the organization, focus must be given to developing and maintaining strong safety and security policies, procedures, and systems. RTP operates in many countries with several hundred national and international staff in a range of positions. RTP will exercise our duty of care as far as it is practical and reasonable to do so in ensuring the safety, security and welfare of our staff, our beneficiaries, and our programs. While every effort to maintain the safety and security of staff will be made by the organization, each staff member must also understand that good safety and security practices is everyone's responsibility.

Due to the significant geographic spread of our programming, safety and security issues differ considerably from country to country and between locations in each country. RTP will work to ensure staff and their dependants in

all our areas of responsibility live and operate safely and securely regardless of their individual ability or disability. RTP's policies and procedures have been developed to provide direction and support for RTP staff on assignment, in addition to providing country leaders with tools to keep staff safe while delivering important programmatic duties.

RTP's Executive Team understands that the safety and security of all staff is a critical issue that must remain a top priority. While RTP takes full responsibility for the wellbeing of staff and assets, each person working or travelling with RTP is required to follow the safety and security plans and protocols set out for them.

Protecting and Empowering Right To Players

Maintaining Confidentiality

Right To Play considers certain records, reports, papers, plans or proposals as being strictly confidential in nature. The organization forbids Team Members to reveal this information to individuals or groups apart from the organization without receiving proper authorization.

Right To Play is a publicly funded organization. It is the practice and belief of the organization that Team Members, private donors and outside funding institutions should have access to normal information concerning the organization's operations, both programmatic and financial. As a result, Right To Play has developed comprehensive and responsible methods of disclosure. However, the organization maintains as strictly confidential, information that may impair its ability to operate effectively in a competitive environment, or which might infringe upon the private rights of individuals, enterprises, or institutions. Team Members are therefore prohibited from divulging confidential information to anyone without receiving prior authorization, except as required in the performance of their duties, or as required by law / Court order. Whenever a Team Member is in doubt as to whether certain information is confidential, or whether such information should be divulged, no disclosure should be made without first consulting the Executive Team at Right To Play headquarters.

Avoiding Conflict of Interest Situations

Team Members must avoid all situations in which their personal interests' conflict or might conflict with their duties to Right To Play. When in doubt about whether (or not) there is a conflict please disclosure to ensure the appropriate review process is followed, even if only a perceived conflict as this protects both the individual and the organization.

Team Members should seek to avoid acquiring any interests or participating in any activities that would tend to:

- Deprive the organization of the time or attention required to perform their duties properly
- Create an obligation or distraction which would affect their judgment or ability to act solely in the organization's best interest

In certain instances, ownership or other participation in a competing or complementary enterprise might create or appear to create such a conflict. Team Members are required to disclose in writing to Management all business, commercial financial interests or activities that might reasonably be regarded as creating an actual or potential conflict with their duties of employment. They must make this disclosure immediately when such activities commence.

Every Team Member who is charged with executive, managerial or supervisory responsibility must ensure that actions taken, and decisions made within their authority are free from the influence of any interests that might reasonably be regarded as conflicting with those of Right To Play. Team Members must act in such a manner that their conduct will bear the closest scrutiny should circumstances demand that it be examined. Team Members must avoid not only actual conflicts of interest but the very appearance of conflict.

Please refer to the [Conflict of Interest Policy](#) for further information.

Fraud

Right To Play is committed to preventing, detecting and responding to fraud. Fraud is the misappropriation of organizational assets or the misrepresentation or misuse of financial or other forms of information for personal gain.

Misappropriation of organizational assets includes, but is not limited to:

- Theft of organizational assets, including property and information;
- Misuse of organizational assets for personal benefit;
- Accepting or providing bribes to internal or external parties;
- Falsification or modification of expense claims, timesheets, receipts or other information for personal gain;
- Manipulating selection processes for procurement or hiring decisions that are intended to result in personal gain;
- Collusion with third parties to allow improper awarding of contracts that results in personal gain through kickbacks or other personal benefits (ex. 'thank you envelopes in some contexts').

Misrepresentation of financial or other forms of information includes, but is not limited to:

- Providing false financial reporting;
- Misrepresenting, forging or falsifying key information;
- Improper or incomplete disclosures of financial information or organizational conditions.

Team members must not engage in fraud. Team members must act with a high level of integrity. Team members must make decisions that are in the best interests of Right To Play and that safeguard our resources and reputation.

Right To Play actively promotes an anti-fraud culture. All team members have a role to play in promoting an anti-fraud culture. Team members must ensure that they are diligent to the possibility of fraud and that they implement the proper preventive and detective controls. Managers must set the proper tone from the top of

an anti-fraud culture. When fraud is suspected, team members must report per the section on “Reporting a Violation of the Code of Conduct.”

Right To Play implements a variety of anti-fraud practices including internal and external audits, preventive and detective controls and a strong management culture of zero tolerance for fraud. When fraud is discovered, Right To Play will take disciplinary action up to and including the termination of employment contracts or legal action.

For further information on specific protocols to follow for Country Offices, please see the “[Field Financial Manual](#)”.

Engaging with Stakeholders

Working with Children and Other Beneficiaries

When carrying out Right To Play activities or events, it is essential that Team Members:

- Uphold this Code of Conduct, and any safeguarding procedures, at all times
- Treat all children and adults at risk fairly, without prejudice or discrimination
- Ensure that allegations or disclosures about abuse are taken seriously and reported
- Follow the Right To Play safeguarding procedures for reporting safeguarding concerns which can be found in the *Right To Play Child Safeguarding Policy* and the *Right To Play’s Whistleblower Policy*
- Challenge unacceptable behaviour and report all allegations and suspicions of violation of Right To Play’s beneficiary protection policy
- Ensure that all contact, interactions, and communications (face-to-face and online) with children and adults at risk are appropriate and relevant to the work of Right To Play

Refer to the [Child Safeguarding Policy](#) for further information.

Abuse of a Position of Trust

Team Members including elected representatives and senior officials, should be aware that they may be seen as role models by children and others in the communities where we have programs and therefore, they must always act in an appropriate manner. Team Members, especially those in positions of authority, must take particular care that their status and power is not used, or may seem to be used, inappropriately to cause harm to the very people we aspire to educate, protect, and empower. When engaging with children and adult beneficiaries in the communities where we serve, Team Members must not abuse a position of trust. A relationship of trust can be described as one in which one party is in a position of power or has influence over the other by virtue of their work or the nature of their activity.

It is vital for any person in a position of trust to understand the power this can give them over those they work to support and the responsibility they must exercise as a result of this relationship. It is essential that Team Members who are in a position of trust recognize this vulnerability and make sure it is not exploited.

Team Members must not engage in sexual activity or allow a sexual relationship to develop with any member of the community that is considered a direct beneficiary of Right To Play programs. Any behaviour which might allow a sexual relationship to develop between the person in a position of trust and a child or person within the beneficiary community must be avoided even if the person appears to consent. It is expected that Team Members will use their judgement to also determine what would be considered unacceptable behavior that could lead to harming the people we serve based on the context and cultural norms.

Public Communication

Social Media Guidelines

Right To Play has developed Social Media Guidelines to guide employees' engagement with and on social media. Please ensure that you review and are familiar with these guidelines: [Social Media Guidelines June 2022.pdf](#)

Intellectual Property

As an employee of Right To Play you will be entrusted with confidential and proprietary information of the Organization and its affiliated corporations. Before participating in any external events, speaking forums, meetings etc. where the employee's work with Right To Play, or the work of others, is to be discussed/shared, the employee must seek approval from their manager in advance to participate. An outline of the information that will be shared must be included in the approval request.

Please refer to the [Confidential Information and Propriety Right Obligations Policy](#) for further information.

Consent for Photography/Videography

If you are taking photos or video of Right To Play programs, events, and/or colleagues, always ensure that you have asked for and received informed consent from every subject you are photographing/filming. Informed consent can be acquired by asking the subject if they agree to be photographed/filmed and informing them of the ways in which the photos/video will be used.

If you are photographing/filming an event, post a notice of filming that informs attendees that the event is being filmed/photographed, and informs them of how the content will be used.

Refer to Right To Play's [Child Safeguarding Policy](#) for guidelines and further information on the process for capturing stories and photography/video of children in our programs.

Compliance and the Code of Conduct

Reference Documents

Any breach of this Code of Conduct is a form of misconduct, and, if substantiated, will lead to disciplinary measures up to and including termination of employment and/or legal action if required.

In addition, Team Members including Partner organizations must not violate any internal policies of Right To Play International, including but not limited to the following:

- [Child Safeguarding Policy](#)
- [Conflict of interest Policy](#)
- [Sexual Misconduct Policy](#)
- [Beneficiary Protection Policy](#)
- [Confidentiality Policy](#)
- [Confidential Information and Propriety Right Obligations](#)
- [Employee Equity and Harassment and Policy](#)
- [Social Media Guidelines](#)
- [Anti-Racism Policy](#)
- [Employee Privacy Policy](#)
- [Whistleblower Policy](#)

Form of Acknowledgment

The below will be noted and digitally acknowledged in My Play Portal:

I acknowledge that I have received a copy of the Right To Play International Code of Conduct last updated April 2022 and that I have read (or re-read) it this year. I fully understand the provisions of the Code of Conduct and acknowledge and accept that:

- *My continued employment or engagement will be dependent upon my compliance with Right To Play's regulations as set forth in the Code of Conduct*
- *My failure to comply is considered gross misconduct and may result in termination of employment or engagement without notice.*

I also understand that I have an obligation to report any violation of these rules and policies in the manner set forth in the Code of Conduct.

I further acknowledge that Right To Play may revise the Code of Conduct at any time and I agree to comply with any revisions to the Code of Conduct.