

Beneficiary Protection Policy

Purpose

The purpose of this Policy is to ensure that all Beneficiaries of Right To Play International (“Right To Play”) have an experience with Right To Play that is safe from any form of Misconduct. In particular, we recognize that Right To Play operates in situations in which Team Members are in positions of power and trust and that, due to the inherently unequal power dynamics, special care must be taken to uphold the dignity and respect of our Beneficiaries.

Scope

This Policy has the purpose to protect Beneficiaries and applies to all Team Members and Partners of Right To Play.

If the Beneficiaries affected are younger than 18 years, please refer to the Child Safeguarding Policy. For actions or behaviors that are only sexual in nature and are directed to Beneficiaries, please refer to the Sexual Misconduct Policy. For actions or behaviors directed to Team Members and Partners, please refer to the Harassment and Violence Policy and Program.

Statement

Right To Play is committed to providing a Workplace in which all Beneficiaries are treated with respect and dignity. Right To Play prohibits all forms of Misconduct committed by Team Members or Partners, including discrimination, harassment, sexual harassment, Sexual Violence, Sexual Abuse and Sexual Exploitation. Examples of Misconducts include:

- Communicating in an insulting, threatening or abusive way, including using offensive language, gestures, comments, messages and online communication;
- Offensive, insensitive or demeaning comments, jokes, pranks or name-calling;
- Displaying images, digital media content or any other materials that may have a sexual nature;
- Destabilizing, discrediting, ridiculing or humiliating a person;
- Yelling, screaming, insulting, swearing or communicating in an abusive way;
- Embarrassing, taunting or making fun of a person;
- Hitting, beating, kicking, punching or attacking a person in any way;
- Blackmailing, extorting or coercing others;
- Direct or implied invitations or requests for sexual favors in exchange for any kind of benefit;
- Unwelcome sexual advances, propositions or physical contact such as hugging, patting, blocking normal movement, brushing against the body, grabbing, hitting or pinching;
- Gesturing, leering, whistling or any other behavior that implies a sexual nature;
- Inappropriate comments, questions or discussions about one’s body, sexual experiences or preferences;
- Sexual Abuse or Sexual Violence, including sexual assault and rape; and
- Sexual Exploitation, including the exchange of money for sex.

The list of examples mentioned above is not exhaustive and discloses only a few of the conducts that are not accepted by Right To Play. Misconducts can take on different forms and can occur in a variety of situations, including social events or the online environment. In addition, these actions and

behaviors can be committed against any person regardless of gender, gender identity, sexual orientation, age or any other characteristics.

This Policy will comply with the local law applicable to each Workplace. Nonetheless, Right To Play may consider a Team Member or Partner's behavior to be in violation of this Policy even if the local law does not consider the given behavior or action to be unlawful.

Any justification for committing Misconduct such as "I didn't know it was prohibited", "It was a joke" or "I didn't mean it that way" is unacceptable. These conducts can occur regardless of the intention of the person who committed it, as long as the action or behavior corresponds to the definition of Misconduct and negatively impacts Beneficiaries.

Team Members are prohibited from offering or exchanging employment, money, goods or services for sex with a Beneficiary or any other person.

Right To Play does not encourage sexual or romantic relationships between Team Members and Participants. These relationships must be formally disclosed to a representative of People and Culture or to a Manager to avoid any misunderstandings or conflicts of interest.

Right To Play recognizes that it takes courage to speak up and report Misconducts. For this reason, Right To Play offers the following channels for Team Members and Beneficiaries to report any incidents or complaints in the most suitable way:

- Any Manager or member of People and Culture;
- Online, through a confidential, anonymous website at www.clearviewconnects.com;
- Canada or USA: over the phone through the **Right To Play Canada/US dedicated toll-free number: 1-866-921-3463**;
- 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: **Clearview Connects, P.O. Box 11017, Toronto, Ontario, M1E 1N0.**

Team Members and Beneficiaries must come forward if they know of, witness or suspect that a Misconduct has occurred. Managers have the obligation to report any Misconduct or claim received from others regarding a Misconduct within 24 hours. Each and every Team Member and Partner is responsible for working together to create a safe, respectful, and inclusive Workplace. Reporting incidents, suspicions or concerns is essential to maintaining this type of healthy Workplace. When in doubt about whether a particular conduct is prohibited, Team Members, Partners and Beneficiaries should always report.

The identities of the individuals who experienced the Misconduct, reported the fact or allegedly committed the wrongdoing will be kept confidential, as well as the information provided about the incident, to the extent possible to still honor our commitment of investigating and ending any Misconduct.

Right To Play takes all complaints seriously and will investigate and deal with all incidents in a fair and timely manner. All Team Members are expected to offer full support to investigations when required. After the investigation process is concluded and based on its results, Right To Play will take immediate action against the person who committed the Misconduct. Right To Play has zero tolerance for any form of retaliation against people who report an incident or collaborate with investigations in good faith.

Team Members are required to adhere to this Policy and will be held responsible by Right To Play for committing or attempting to commit any Misconduct. Disciplinary actions for violations of this Policy will take into consideration the nature and severity of the violation and may include a verbal or written reprimand, suspension, termination or refusal of service.

All Partners of Right To Play must formally acknowledge, agree and comply with this Policy as a pre-condition for any partnership with Right To Play. Partners who fail to comply with the terms of this Policy will be subject to disciplinary action, up to and including withdrawal of funding and termination of partnership agreements.

Responsibility

Responsibility of Team Members:

- (a) Understand and comply with this Policy and related procedures;
- (b) Participate in training programs related to this Policy;
- (c) Promptly report any incidents or complaints regarding any Misconducts;
- (d) Fully cooperate in investigations related to this Policy; and
- (e) Keep confidential any information regarding the claims, reports or the investigation process.

Responsibility of Managers:

- (a) Provide information and instruction on the contents of this Policy through completion of applicable training;
- (b) Report any Misconduct or claim received from others regarding a Misconduct within 24 hours from the moment the Manager becomes or should have become aware of it;
- (c) Consult with People and Culture whenever a relationship report is received;
- (d) Ensure that Team Members comply with the terms and procedures of this Policy;
- (e) Encourage Team Members to report incidents and complaints related to this Policy; and
- (f) Keep confidential any information regarding the claims, reports or the investigation process.

Responsibility of Right to Play:

- (a) Communicate and provide training on this Policy to all Team Members;
- (b) Review and evaluate this Policy every year;
- (c) Develop and maintain a program to implement this Policy;
- (d) Track, monitor, investigate and deal with all incidents or complaints in a fair and timely manner;
- (e) Prepare an annual accountability report regarding incidents or complaints of Misconducts to be shared with the International Board of Directors, donors and the public; and
- (f) Keep confidential any information regarding the claims, reports or the investigation process.

Responsibility of Partners:

- (a) Comply with this Policy and to all related processes and procedures of Right To Play; and
- (b) Provide full collaboration to investigation processes, including providing all relevant information and participating in interviews.

Questions

Please contact People and Culture at HQHR@righttoplay.com if you require additional information in relation to this Policy.

Definitions

- a. **“Beneficiary”**: A person who is either directly or indirectly engaged in a Right To Play program and who benefits from the activities of the program (e.g. students, parents, teachers, community members).
- b. **“Discrimination”**: is treating a person or a group of people in an unfair, unequal or less favorable way, whether intended or not, than another person or group of people based on prohibited grounds such as: sex, age, race, religion, family status, and disability.
- c. **“Harassment”**: is engaging in a course of conduct against a person(s) at the Workplace that is known or ought reasonably to be known to be unwelcome. Workplace Harassment includes Sexual Harassment.
- d. **“Manager”**: A Team Member who has direct reports or whose position is Manager or higher.
- e. **“Misconduct”**: Any form of action or behavior that is disrespectful, offensive or improper.
- f. **“Partner”**: A person or organization that provides services, has partnerships or engages with Right To Play, including consultants, volunteers who are part of another organization, athlete ambassadors and implementing partners.
- g. **“Participants”**: Beneficiaries who directly benefit from Right To Play programs, such as teachers participating in training initiatives.
- h. **“Sexual Harassment”**: refers to any course of conduct against a person in a Workplace because of sex, sexual orientation, gender identity, gender expression or any other sexual connotation in which the course of comment or conduct is known or ought reasonably to be known to be unwelcome.
- i. **“Team Member”**: A person who works or volunteers for Right To Play and reports directly to this organization. Includes employees, board members, interns and volunteers.
- j. **“Workplace”**: Any land, premises, location or thing in which Team Members work or interact as part of a professional context. The Workplace includes circumstances and conducts that have work-related implications, repercussions or have the potential to affect the reputation of Right To Play regardless of whether it occurred during or after work hours (e.g. field trips, holiday parties, texting, and social media posts).

The following definitions were extracted from the United Nations Glossary on Sexual Exploitation and Abuse:

- k. **“Sexual Abuse”**: Means any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- l. **“Sexual Exploitation”**: Means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. It includes Transactional Sex and solicitation of Transactional Sex.
- m. **“Sexual Violence”**: Acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, or by taking advantage of a coercive environment or such person’s or persons’ incapacity to give genuine consent. Forms of sexual violence include rape, attempted rape, forced prostitution, sexual exploitation and abuse, trafficking for the purpose of sexual exploitation, child pornography, child prostitution, sexual slavery, forced marriage, forced pregnancy, forced public nudity, forced virginity testing, etc.
- n. **“Transactional Sex”**: Means any exchange of money, employment, goods or services for sex, including sexual favors and other forms of humiliating, degrading or exploitative behavior. This includes any exchange of assistance that is due to beneficiaries of assistance.

References

- Code of Conduct
- Whistleblower Policy
- Child Safeguarding Policy
- Gender Equality Policy
- Sexual Misconduct Policy
- Workplace Harassment and Violence Policy and Program
- United Nations Glossary on Sexual Exploitation and Abuse