



RIGHT TO PLAY

PROTECT. EDUCATE. EMPOWER.

This policy applies to all Right To Play Employees, Volunteers, Interns, Consultants and other representatives¹ (hereinafter collectively referred to as “Team Members”) working with Right To Play International and its National, Regional and Field Offices (hereinafter collectively referred to as “Right To Play”).

INTERNATIONAL CODE OF CONDUCT

The provisions of this Code, as set forth in Sections 1 through 8 below, are mandatory. Team Members are expected to fully comply with these provisions under all circumstances. The Code affirms the organization’s commitment to uphold high moral and ethical standards. It specifies the basic norms of behavior for those who are involved in representing it and is aligned with Right To Play’s value, which guides how we act and interact. Our culture code consists of the following values:

- Accept everyone: be intentional about inclusion
- Make things happen: seek opportunities to lead and innovate
- Display courage: act with integrity
- Demonstrate care: look after yourself and one another
- Be playful: have fun at work

Team Members who sign this Code are responsible for complying with it.

1. Child Protection

Team Members must comply with the Child Protection Policy of Right To Play.

Right To Play is committed to the welfare of children around the world. We oppose all forms of:

- discrimination and exploitation of children
- manipulation
- violence and abuse, including sexual child abuse (commercial and non commercial)

as set out in the UN Convention on the Rights of the Child.

Right To Play embraces its responsibility to provide equal rights and opportunities to all children without discrimination or unequal treatment on the grounds of their age, culture, caste, nationality, creed, ethnicity, disability, HIV status, family situation, gender, language, racial origin, socio-economic status, religious belief and/or sexual orientation.

In order to uphold the commitment to keeping children safe, all Team Members have:

- a duty of care to the children with whom we work
- an obligation to meet minimum standards of protection for the children in our care
- the responsibility to report concerns of abuse of children (see “Reporting a Violation...,” page 7).

¹ Representative means any person who is acting on behalf of Right To Play.

2. Financial Reporting and Accounting

Team Members must ensure that Right To Play's books and records reflect the transactions and disposition of assets of the organization in an accurate, fair and timely manner.

Team Members must have all transactions authorized, executed and recorded in accordance with the instructions of Management² to permit the accurate preparation of financial statements and to maintain accountability for assets.

Team Members are permitted access to assets only in accordance with the authorization of Management. Management and Team Members are to record and disclose all assets and funds. Team Members are strictly prohibited from the use of the organization's funds or assets for any unlawful or improper purpose. Those responsible for the accounting and record-keeping functions are required to be vigilant in ensuring enforcement of this prohibition.

3. Theft, Embezzlement, Fraud

Team Members must not steal or remove from the property, without authorization, anything belonging to Right To Play, employees, visitors, or contractors.

This could include money, cheque, money order, inventory, merchandise, supplies, tools, equipment, documents, data, software, copyright, information or ideas (intellectual property).

4. Manipulation or Falsification of Data, Records, Reports, Contracts

Team Members must not, whether authorized or unauthorized, manipulate, falsify or forge data, dollar amounts, statistics, narratives, or other information on any reporting form or screen, report, statement, letter, document, or contract.

This might include changes made to:

- hide mistakes
- cover up fraud
- gain personal, departmental, or organization advantage by improving statistics or results
- gain unfair advantage (or cause harm) to an employee, supplier or customer.

² Management are persons who have management authority within Right To Play. They may be called Country Manager, Program Manager, Regional Director, National Director, Deputy Director, etc.

5. Violation of Laws, Regulations, Policies, Procedures

Right To Play and its Team Members shall comply fully with all lawful requirements applicable to the work of the organization and the country of operation.

Many of Right To Play's activities are subject to complex and changing laws, depending on the country where they are operating. Whenever a Team Member is in doubt about the application or interpretation of any legal requirement, he or she should refer the matter to Management who, if necessary, should seek the advice of the organization's legal counsel.

6. Unethical Conduct and Conflict of Interest

- a. Team Members must maintain a level of personal conduct that will not reflect negatively on themselves or on the credentials of Right To Play.

In varying measure, each Team Member represents the organization in his or her relations with others such as partners, suppliers, other Team Members, governments, or the general public. The organization expects each Team Member to act in a manner that will enhance Right To Play's reputation for honesty and integrity, whether at home or abroad.

All Team Members are expected to conduct themselves in a responsible manner at all times. This expectation includes a requirement to avoid:

- excessive use of alcohol
- the use of illegal drugs or mind altering substances
- the use of abusive or culturally insensitive language, and
- a promiscuous lifestyle

that directly and negatively affect other Team Members and the reputation of Right To Play as a whole. Furthermore, while posted to field/operational locations Team Members understand that it is not appropriate to, and accordingly shall not, engage in personal relationships with local staff members and beneficiaries of Right To Play programming, to a degree that would create a distraction, obligation or dependency on the part of either party in the relationship.

- b. Team Members shall not furnish to other persons, directly or indirectly, expensive gifts or provide excessive entertainment or benefits on behalf of Right To Play.

Team Members, whose duties permit them to do so, may furnish modest gifts, favours and entertainment to persons, other than public officials, if all of the following conditions are met:

- they are not in cash or other negotiable instruments
- they cannot reasonably be interpreted as a bribe, payoff or other improper payment and are of nominal value
- they are made as a matter of general and accepted business practice
- they do not contravene any law and are made in accordance with generally accepted ethical practices
- proper accounting is made
- their provision would not in any way embarrass Right To Play or its recipients, if subsequently disclosed to the public.

Team Members are required to report to Management all gifts given of a value greater than \$100 CAD or relative local equivalent.

- c. Team Members shall not use their employment status to obtain personal gain from those doing or seeking to do business with Right To Play.

Team Members should neither seek nor accept for themselves:

- gifts
- payments
- services
- fees
- special advantage not available to other members of Right To Play or members of the general public
- special valuable privileges such as pleasure or vacation trips or accommodations or loans from any person (except, in the case of loans from persons in the business of lending and then only on conventional terms) or from any organization or group that does, or is seeking to do, business with Right To Play or any of its affiliates.

However, Team Members may accept modest gifts, favours or entertainment provided that standards are met consistent with the conditions relating to the giving of gifts set forth in Section b above.

Team Members are required to report to Management all gifts accepted of a value greater than \$100 CAD or relative local equivalent.

- d. All dealings between Team Members and public officials are to be conducted in a manner that will not compromise the integrity or reputation of any public official or Right To Play or its affiliates.

Even the appearance of impropriety in dealing with public officials is unacceptable. Team Members are expressly forbidden to participate in any bribes, kickbacks, illegal gratuities, indirect contributions or similar payments, whether directly or indirectly. It is of the utmost importance to Right To Play that Team Members maintain a high standard of integrity.

Team Members may not give even an inexpensive gift or a modest entertainment or benefit to a public official unless:

- he or she is authorized by the International Board of Directors or duly authorized designate (an Executive Team Member at Right To Play headquarters) to do so, and
- it complies with the conditions prescribed by the Board in that regard and with the conditions set out in Section b above.

The furnishing of such gift, entertainment or benefit may be open to the interpretation that it is furnished illegally to secure the public official's use of his or her influence.

If a Team Member is told that it is necessary to make payments directly to public officials in a country of assignment to facilitate the legitimate operations of Right To Play, the decision on making such payments will be done only by Team Members specifically authorized to do so by the International Board of Directors or duly authorized designate. Team Members shall report each such payment without delay to the Board or duly authorized designate, together with the reason therefore.

- e. 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.

- f. Team Members must avoid all situations in which their personal interests conflict or might conflict with their duties to Right To Play.

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 his or her jurisdiction 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.

7. Health and Safety Environment

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 must fully document and report in writing to Management any workplace health and safety incidents.

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).

8. Harm to People or Property

Team Members must adhere to the policy of Right To Play which is to provide a work environment free of violence, discrimination and harassment in which individuals are accorded equality of employment opportunity 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.

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.

Right To Play will not tolerate verbal or physical 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
- 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.

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 jurisdiction 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 shall sign the prescribed form of acknowledgment. The head of the department will retain this form. He or she shall confirm annually to senior management that each such Team Member under his or her jurisdiction has completed the required form. This confirmation

acknowledges that the Team Member has read or reread, as the case may be, 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 individual 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 he or she were a Team Member of Right To Play.

Consequences of Violation of this Code

Failure to comply with the Code can have severe consequences for both the Team Members involved and Right To Play. If it is confirmed that anyone associated with Right To Play contravenes this code, the organization will impose appropriate discipline which may include:

- disciplinary action up to and including dismissal for staff
- ending of a volunteer relationship
- possible withdrawal of funding/support
- termination of a contract.

Furthermore, Team Members whose conduct violates the Code may also be violating domestic and foreign country laws. Such conduct can subject both Right To Play and the Team Members involved to prosecution and legal sanctions.

Reporting a Violation of the Code of Conduct

Right To Play has established 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 regions. The system time stamps all reporting as it is logged into the system. Authorized staff 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 duty of care and report that information immediately:

- to Management, 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 where necessary.

It is a serious violation of this Code to discriminate or retaliate against Team Members for reporting such information.

It is a serious violation of this Code to report malicious, reckless or knowingly false statements or allegations.

Reference Documents

- Right To Play Child Safeguarding Policy
- Right To Play Confidentiality Agreement
- Right To Play Beneficiary Policy
- Right To Play Equal Employment and Harassment Policy
- Right To Play Sexual Misconduct Policy
- Right To Play Gender Equality Policy
- Right To Play Whistleblower Policy
- Right To Play Anti-Racism Policy

Form of Acknowledgment

I acknowledge that I have received a copy of the Right To Play Code of Conduct and that I have read and 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 rules and policies as set forth in the Code of Conduct
- my failure to comply can 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.

Name of Team Member

Signature of Team Member

Location

Date

Witness