

CODE OF CONDUCT

CODE OF CONDUCT FREE PRESS UNLIMITED

Background

- A) **The mission of Free Press Unlimited** was incorporated in the founding statutes in 2011 and has been adapted in this Code of Conduct and approved by the Supervisory Board of Free Press Unlimited.
- B) The core values of Free Press Unlimited. Based on the mission and strategy FPU has established a Code of Conduct. The Code is based on five core values:
 - Independent
 - Inspirational
 - Inventive
 - Dedicated
 - Tailor-made
- C) Scope of the **Code of Conduct of Free Press Unlimited.** The following outlines have been taken into account while drafting the Code of Conduct:
 - The Supervisory Board, the Board of Directors and the staff of Free Press Unlimited attach the greatest possible value to the trustworthiness of Free Press Unlimited's activities and the good name and reputation of the organisation. We therefore believe it is understandable and essential to develop a Code of Conduct which sets out the standards for ethical behaviour of all Free Press Unlimited's representatives.
 - Free Press Unlimited is an organisation which develops media initiatives and supports (media) partner organisations in developing countries and fragile and repressive states. The strength of Free Press Unlimited lies in its close involvement and partnership with local partners and the use of experts for tailor-made solutions.
 - The Code of Conduct is applicable to affiliated organisations and all staff, regardless of the contractual basis of their employment relationship with Free Press Unlimited. The Code also applies to independent third parties who are hired by Free Press Unlimited or act in the name of Free Press Unlimited, in all cases where Free Press Unlimited may be held responsible for their actions. Worldwide all Free Press Unlimited representatives are obliged to strive for the same high personal and ethical standards everywhere.

A. Mission of Free Press Unlimited

Mission

Free Press Unlimited's <u>mission</u> is to make independent news and information available to people and keep access to that open to everyone, especially to those people living in countries where limited access to information and press freedom exists. This mission is <u>strategically</u> operationalised by supporting local media professionals and journalists in order to contribute that all people keep access to the information needed for survival and development. Free Press Unlimited strives to create and enlarge Freedom of Expression, promote press freedom and media diversity. Its focus is on working on projects with local partners in developing countries as well as repressive and fragile countries.

Strategy

Free Press Unlimited focuses on strengthening the capabilities of people and organisations (in and for media) to express themselves freely, to create, enhance and use to the full the space around them.

The focus is therefore on people and organisations that make a difference - *change agents* - who are forerunners and who act as catalysts for change. Free Press Unlimited will support them in the (further) development of their knowledge and skills. Special emphasis is therefore placed on developments in the fields of information and communications technology and innovative (educational) methods.

Theory of Change and Long Term Objectives

In 2014, FPU developed a comprehensive Theory of Change for the organisation. The Theory of Change aimes to develop a more refined set of objectives, intermediate outcomes and intervention strategies as well as defining the contribution to policy and advocacy development for change. Altogether it forms the pathway to change and to achieve the Long Term Objective (LTO) which we have defined as follows:

Media and journalists, as independent players in civil society, constitute a diverse and professional media landscape and act as change catalysts on citizens behalf.

To achieve this LTO we defined three intermediate outcomes:

- 1. An enabling environment for independent media results in respect and acknowledgement of the role of independent media and access to information in society
- 2. Civil Society supports and embraces independent media and journalists act as a watchdog on behalf of the public
- 3. Media and journalists operate professionally and have access to knowledge and resources to play their role as sustainable actors in the media landscape

This comprehensive organisational pathway to change serves as a direction for Fee Press Unlimited to develop meaningful and impactful intervention strategies to fulfill its mission as well as to serve its partners and beneficiaries.

B. Core values of Free Press Unlimited

Free Press Unlimited works in accordance with the following core values:

Independent

Free Press Unlimited does not accept assignments from financial pressure groups or political groups and follows her own independent strategy. This implies that Free Press Unlimited works with independent (media) partners who are able to execute their activities freely and independently and whose aim is to search for the truth and provide informative services to the general public. This independency is supported by the endorsing of a number of (legal) principles in the work of Free Press Unlimited:

- I. <u>Human Rights</u>: to respect the universal declaration of human rights, even in situations where this cannot be enforced, focusing on freedom of speech and press freedom;
- II. Equality by law: to work on the notion that all human beings are equal by law and should be treated as such. Discrimination on any ground is prohibited;
- III. Act ethically: to not accept (sexual) harassment and intimidation between journalists and their subjects, between teachers and students and at the workplace.

Inspirational

Free Press Unlimited strives to inspire local media professionals or organisations to get the best out of their talents and opportunities by sharing knowledge and ideas. We are result-oriented, we make a difference and reach more people.

- I. <u>Individual expertise</u>: aimed at capacity strengthening of individuals who are the driving forces behind better provision of information to the local population;
- II. <u>Social change:</u> aimed at actors who support the mission of Free Press Unlimited and bring it within reach of their own community.
- III. Result & impact: aimed at initiatives within the context mentioned to improve provision of information to all civilians.

Inventive

Free Press Unlimited searches for smart, creative solutions for the benefit of free access to information, even if there are obstacles or barriers.

- I. <u>Less is more:</u> aimed at implementation of low cost and efficient solutions for complicated issues through a good (in-depth) analysis and tailor-made solutions;
- II. <u>Pragmatic:</u> aimed at finding effective solutions which are safe for those involved and which don't stand in the way of the primary process;
- III. <u>Exchange</u>: stimulates exchange of knowledge of a diversity of partners aimed at collective learning and accountability.

Dedicated

Free Press Unlimited is personally involved and persistent in matters concerning local inhabitants, situations and organisations. This is expressed in:

- I. <u>Involvement</u>: aimed at an intensive relationship with (media) partners in which we search in mutual coherence for the best solutions;
- II. <u>Persistence:</u> aimed at long term involvement with a focus on educating and training individuals and media organisations to become autonomous;
- III. Realistic: aimed at measurable, time-limited, realistic and feasible objectives.

Tailor-made

Starting point for Free Press Unlimited is the local situation and culture. We are looking for partnerships and participation, support pluriformity and diversity and take into account the local capacity and technological development.

- I. <u>Social change</u>: aimed at (media) partners who are involved with and create support within their local community;
- II. <u>Financial sustainability</u>: aimed at promoting a sustainable and sound financial structure that supports the capacity of the partners;
- III. Technological progress: taking into account balanced and ethical use of technology

Free Press Unlimited also endorses the need for good governance and financial transparency. For all of our research activities, consultancy, training and projects etc. we have developed professional standards based on the above mentioned core values.

C. Code of conduct professional practice Free Press Unlimited

The culture at Free Press Unlimited is based on trust, mutual respect, open communication and high standards with regard to professional conduct. These key words play an essential role in achieving our mission. We place our trust in the common sense of our staff and all representatives and trust that they will act within the bounds of the law, with integrity, act ethically and will do everything in their power to ensure that the name and good reputation of Free Press Unlimited is never questioned. In this Code of Conduct we make clear what we expect of our representatives (i.e. staff, partners and all other parties with whom we work based on a contract) and also what they can expect of Free Press Unlimited.

Involvement in the community

On the basis of these core values, Free Press Unlimited strives to be an organisation that is a trustworthy member of society. The activities of Free Press Unlimited focus on serving the countries and communities where it is active and not damaging their interests. Therefore, Free Press Unlimited also aims to be accountable to the societies and communities where it is active following the principle of 'do no harm'.

Sustainable development

In the light of the objective for sustainable development of prosperity and well-being, Free Press Unlimited is committed to respectful treatment of mankind, nature and the environment. Free Press Unlimited invests in people and focuses on sustainable business practices.

Fair trade

We carry out our national and international activities in an honest and fair manner in order to achieve a high level of transparency and accountability. The principles of justice, trust and integrity are of the utmost importance. We respect the law and legislation and governing practices and show

consideration for the norms and values upheld in the countries and communities where we are active. We expect the same from our representatives. Within Free Press Unlimited no one has the right to encourage others to break the law or act in contradiction with the principles defined in this code of conduct.

Fraud and corruption

Fraud and corruption are serious crimes and Free Press Unlimited has a zero tolerance approach to it. The headquarter of Free Press Unlimited is based in The Netherlands. Dutch laws and legislation regarding corruption of government officials also apply where persons are guilty of this outside of The Netherlands. The law therefore also extends to the representatives of Free Press Unlimited. They are under no circumstances permitted – either directly or indirectly – to bribe or to offer, promise, give, ask for or accept other inappropriate privileges with the intention of receiving or keeping an unauthorized privilege. Representatives of Free Press Unlimited are also not permitted to engage the services of third parties to bribe government officials, business contacts or their families by means of procurement contracts, purchase orders or consultancy agreements.

Free Press Unlimited will recover any losses from all persons that committed the fraud, whether they are staff or not. If necessary, disciplinary measurements will be taken against these persons.

All staff and representatives are responsible for the prevention and detection of fraud, misappropriations and other irregularities. Each member of a team at any level in an organisation is expected to be familiar with the types of risks and improprieties that may be relevant for his/her area of responsibility and be alert for any indication of irregularities. Any irregularity that is suspected or detected must be reported immediately according to the Complaints and Reporting Procedure. For a more detailed narrative we refer to the Fraud & Corruption Policy of Free Press Unlimited.

Integrity

Free Press Unlimited aims to create a working environment where people treat each other with trust and respect and where everyone feels responsible for the results and good reputation of Free Press Unlimited. All staff and representatives are expected to refrain from any acts of misconduct. Within Free Press Unlimited we ask and do not assume, especially on occassions where there might be an act of misconduct. At Free Press Unlimited we expect the following conduct of our staff and representatives:

- we treat everybody equally in equal circumstances and do not discriminate based on race, gender, sexual orientation, disability, political convictions, religion, or for any other reason, in any way;
- we will not engage in harassment, exploitation and sexual abuse or threat of abuse;
- we stay away from and strongly reject any abuse of power;
- we reject any form of violence including but not limited to: bullying, verbal, physical or sexual harassment, rape, exploitation, intimidation and victimisation;
- we show behavior that respect the dignity of others including their (personal) confidentiality;
- we reject behavior which leads to, or could potentially lead to health or security problems for the person themselves or for other people;
- we reject any exchange of money, employment, goods (including but not limited to drugs and alcohol) or services for sex, including sexual favors or other forms of humiliating, degrading, compromising or exploitative behavior;
- we shall in no way be involved in any form of forced or child labour;
- we respect the dignity of the individual and the right of its staff to the freedom of association;
- we provide good communication with our staff and representatives by means of information and consultation procedures;
- we offer staff members and representatives the opportunity to report any kind of misconduct.
- A representative (of FPU) should not work under the influence of alcohol or drugs. If you work under the influence of drugs or alcohol, you pose an unacceptable safety risk to yourself and others. Drugs may include illegal drugs, controlled substances or misused prescription medication. You are expected to perform your job duties free from the influence of any substance that could impair job performance. We therefore prohibit:
 - · Working under the influence of alcohol, illegal drugs or controlled substances
 - Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working or on the premises.

Disciplinary measures / sanctions

It is the duty of all staff and representatives who become aware of any breaches of this Code to report this immediately to a line manager or through the established reporting mechanism (via the website). Failure to report concerns of sexual abuse and exploitation will constitute misconduct and be considered grounds for disciplinary measures.

All reports and information about breaches of this Code is handled with the utmost discretion. A grounded report will be handled by an independent 'complaint commission'. Within 14 days after receipt of the suggestions / advice of the complaint commission, the Board of Directors will take a decision. Depending on the level of complaint the following sanctions can be enforced:

- written reprimand or warning
- suspension for a period of time (in line with the staff regulation)
- dismissal / resignation

Offer or acceptance of gifts, contributions or favours

Representatives of Free Press Unlimited must refuse to accept gifts where acceptance could create the appearance of unethical enticements or unacceptable behaviour. Representatives of Free Press Unlimited may not offer or accept gifts that deviate from the norm, the norm being the standard protocol within accepted ethical norms. Gifts or favours in exchange for services or unacceptable reciprocal acts must always be refused.

The guideline is that gifts of more than € 50 are unacceptable and must be refused. If a friendly refusal to accept a gift would insult the giver or jeopardise the work relationship, the Board of directors/ must be consulted. If the gift is accepted, it becomes the property of Free Press Unlimited.

Avoidance of a conflict of interest

Free Press Unlimited relies on the complete trustworthiness of its representatives, partners and other stakeholders. Conflict of interest, or the appearance thereof, damages the good name of Free Press Unlimited. A conflict of interest means every situation in which representatives of Free Press Unlimited use their contacts and their position within Free Press Unlimited to serve their own professional or financial interests, regardless of whether or not this might be detrimental to Free Press Unlimited.

Representatives of Free Press Unlimited must avoid all situations where a conflict, or appearance thereof, may arise between personal interests and the interests of Free Press Unlimited.

A conflict of interest can take on many forms and these cannot all be dealt with separately in this Code. It is each Free Press Unlimited representative's responsibility to avoid a conflict of interest by applying his or her own judgement, integrity and ethical standards. It is also the responsibility of the representative to report situations that are completely justified, but that could be seen as a conflict of interest.

Confidential information protection and accurate reporting

Specific information pertaining to the activities, projects, strategies and company details of Free Press Unlimited is subject to property rights, such as personal details of representatives of Free Press Unlimited, students, clients, research participants, and interviewees. Unauthorised disclosure may be detrimental to Free Press Unlimited, representatives and clients or may give others an unfair advantage. Thus, Free Press Unlimited expects its representatives to respect and actively protect the confidentiality of such information.

The integrity and completeness of reports is not just a policy of Free Press Unlimited, but also a legal requirement. Our financial transactions are recorded in a correct, accurate and honest manner. The management is responsible for the integrity of the reporting and has the reports audited externally in order to meet this responsibility.

D. Responsibilities

This Code of Conduct forms an integral part of your contract (whether an employment, subgrant, expert or other kind of contract) with Free Press Unlimited. The Code of Conduct gives you the necessary information to perform on behalf of Free Press Unlimited in an ethical way. It is your responsibility to comply with the Code of Conduct and other relevant policies.

Leading by example

The primary responsibility of the integrity of the organisation lies with the Board of Directors and the management. Secondary lies the responsibility with the Supervisory Board and thirdly with all staff and representatives of Free Press Unlimited. The Management (including Board of Directors) delegates the responsibilities partly to a so called Integrity Department.

Reporting inaccurate, unethical or illegal behaviour

Free Press Unlimited strives to create a culture based on trust and individual responsibility. Nonetheless, representatives may be confronted with unethical or illegal behavior in the context of the work of Free Press Unlimited. We place high value on offering our representatives the opportunity to report any misconduct in a safe and honest manner according to the Free Press Unlimited Complaints and Reporting Procedure to be found on the website.