



Code of **Conduct** for External Parties



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1. Introduction

Free Press Unlimited is an international press freedom organisation that collaborates with independent media organisations and journalists, in more than 50 countries around the world. With them, we work on the mission to make independent news and information available to everyone.

Free Press Unlimited's Code of Conduct¹ (the **"Code of Conduct"**) strengthens its mission and vision and is based on our core values. The principles set out in this document are applicable to external organisations and stakeholders engaging with Free Press Unlimited, including partner organisations, media partners and other external parties, regardless of the nature of their relationship with Free Press Unlimited.

They provide guidance for making decisions, both in your daily work and in any situation that may have a bearing on the organisation's activity. In that sense, this Code of Conduct states explicitly the goals with regard to the acceptable behaviour and formulates ethical norms for everyone working for or on behalf of Free Press Unlimited.

The Code of Conduct was approved by the Management Team on April 15 2024. The Works Council approved the Code of Conduct on February 21 2024. This Code of Conduct is dated 31 July 2024.

The responsibility for updating and amending the Code of Conduct to reflect new developments lies with the HR department. Latest updated version is dated 23 March 2026.

¹ A Code of Conduct is a set of established guidelines, principles, and rules that outline the expected behaviour, ethical standards, and responsibilities of individuals working for and with the organisation. It serves as a framework for promoting appropriate and ethical conduct, fostering a safe and respectful environment, and ensuring the adherence to standards of behaviour and integrity.

2. Work **Ethics & Integrity**

2.1 Our Values

As an organisation, we strive for a culture of trust, mutual respect, open communication and high professional standards, because these keywords play an essential role in achieving our mission.

We place our trust in our staff, partners and representatives to follow these guidelines, and are confident that they will act within the bounds of the law, with integrity, ethics and will do everything in their power to fortify our values and mission.

- We are an **independent** organisation working with independent media organisations and journalists who execute their activities independently and whose aim is to search for the truth and provide informative services to the general public.
- We aim to **inspire** and support media professionals and organisations all over the world to use their diverse talents and opportunities to the fullest.
- We are **result-oriented**, we make a difference, and we want to achieve positive social impact.
- We are **inventive** and look for smart and creative solutions, to enable free access to information.
- We are a multifaceted team of **dedicated** and intrinsically motivated people, passionate about contributing to the mission of the organisation.
- We take into account the location context, the norms, cultures and capacities of the media organisations with whom we work, making our work **tailor-made**.

2.2. Responsible behaviours

On the basis of our core values, Free Press Unlimited strives to be an organisation that is a trustworthy member of society. Our activities focus on supporting the countries and communities where we are active without damaging their interests. Consequently, Free Press Unlimited also aims to be accountable to the societies and communities where it is active following the principle of 'do no harm'.

A 'do no harm policy' refers to a set of principles and guidelines that Free Press Unlimited embraces to ensure that we do not cause harm, damage, or create negative consequences to others or the environment through our actions or decisions. Ethical considerations and a commitment to avoiding behaviours or practices that could have detrimental effects on individuals,

communities, the environment, or any stakeholders affected by the organisation, therefore, are guiding.

It is essential for Free Press Unlimited to conduct its work duties following the ethical principle of non-maleficence, which advocates behaviour that underscores, fosters and maintains honest, respectful and transparent relations among its staff, other members of the organisation and all third parties we may interact with.

In order to help keep a respectful, safe and secure environment for all those we work and relate with, all individuals working for or on behalf of Free Press Unlimited are expected to abide by the standards described below.

2.2.1 A Safe Working Environment

1. Create and maintain a respectful working environment by promoting good working relations with colleagues, third parties and stakeholders alike, with an atmosphere of collaboration, trust, mutual respect, honesty, and open communication.
2. Treat everybody according to their needs and do not discriminate based on race, ethnicity, gender, sexual orientation, disability, political convictions, religion, age, cultural background, or for any other reason, in any way.
3. Act in the best interest of the in-country journalists, media partners and communities we work with, do them no harm, and support their right to make their own choices.
4. Respect diversity and inclusiveness in the working environment, in terms of both personal characteristics and professional background.
5. Use your position or authority responsibly in service to Free Press Unlimited's mission and activities. This means not using your authority or position to harm others or for favours or personal benefits.
6. Carry out your work in an honest and fair manner in order to achieve, amongst others, a high level of transparency and accountability. And therefore, abide by the principles of justice, trust and integrity in all your activities.

7. Treat all stakeholders and other third parties involved with dignity, respect and cultural appropriateness. This includes acting with care and awareness that some behaviour may be viewed as offensive even when not intended as such.
8. Always consider the safety and security implications of operational decisions.
9. Be aware of and comply with all instructions designed to protect your health, welfare, safety and security.

2.2.2 A trustworthy member of society

1. **Respect the law and legislation and governing practices**

Show consideration for the norms and values upheld in the countries and communities where Free Press Unlimited is active. This includes being mindful that while certain behaviours may not be a problem in some countries, the same behaviours may be problematic or illegal in others. In case of doubt about whether a specific behaviour is appropriate, seek advice from your contact person at Free Press Unlimited.

2. **Ensure responsible use of Free Press Unlimited's property, resources, funds, assets and information**

Ensure that the material and financial resources entrusted to you are used responsibly and efficiently. This means using and maintaining Free Press Unlimited's property, records, files, intellectual property rights, work equipment, accounts and financial statements in a manner that aligns with work objectives, applicable national laws, and Free Press Unlimited's (internal) controls and protocols.

- a. Do not wilfully or negligently damage, misappropriate or steal Free Press Unlimited property, resources, funds, assets or information. Use these responsibly, for their intended purpose, and account for them accurately and transparently.
- b. Do not engage in fraud or corruption, including accepting or offering bribes or exercising undue influence to obtain a benefit for yourself, Free Press Unlimited or any third party.
- c. Conduct all activities in accordance with national and international laws and standards, and do not contribute to the financing of terrorism, engage in money laundering or evade taxes.

3. **Respect and actively protect personal data² to which you have access and for which you are, or Free Press Unlimited is, responsible.** Free Press Unlimited expects anyone working for and/or with Free Press Unlimited who receives or uses personal data in the context of his/her duties to respect the following guidelines:

- a. Treat personal data as confidential information.
- b. Be transparent towards the individuals to whom the personal data relates. These individuals must always be aware of the existence of the processing and the reason for it. Refer to the applicable local or international law where possible.
- c. Limit access to such personal data, so that access is only sought to the personal data necessary for the performance of your duties (the "need to know" principle).
- d. It is fundamental to take security measures to protect the personal data. To this end, Free Press Unlimited has taken organisational measures (e.g., this Code of Conduct) and implemented technical measures (e.g. VPN, drive, 2FA). These measures must be respected and complied with at all times and you will not attempt to circumvent any such measure or assist anyone else doing so.
- e. Personal data must only be viewed and processed for the purpose of your activities for Free Press Unlimited. They must not be communicated to third parties except if you have been explicitly instructed to do so by your contact person at Free Press Unlimited.
- f. If you notice or suspect any breaches, losses, or other risk situations that could lead to a data breach, you must immediately report this to your contact person at Free Press Unlimited. Be aware that Free Press Unlimited may be bound by certain deadlines to report data breaches to the competent authority (72 hours, in case of personal data breaches).
- g. Always immediately inform your contact person at Free Press Unlimited if someone asks you a question about the processing of his/her personal data by Free Press Unlimited so that this query can be answered within the legally provided timeframe if necessary.

4. **Respect and keep confidential any information** (including any personal data) and documents pertaining to the activities, projects, strategies and

² "Personal data" is any information about a person that can be directly or indirectly identified, for example, a name, email address, or date of birth of representatives of Free Press Unlimited, representatives of partner organizations, participants of events/workshops, and interviewees.

company details of Free Press Unlimited, except where necessary for the performance of your duties.

5. **Use responsible judgment online, including when sending information by email or sharing information on social media platforms.** This includes, amongst others, the following guidelines:
 - a. When using personal social media accounts (for example, but not limited to; Instagram, LinkedIn, Facebook, X, TikTok, Mastodon, any Meta product etc.) whilst employed with, engaged by or in any other way working for, or representing Free Press Unlimited, please ensure to state in your bio: **'My opinions are my own'**.
 - b. For any communication regarding Free Press Unlimited related projects or events - please contact the Communications department for external communication on our website or social media. This should always be the primary means of communication regarding our work.
 - c. Always ask for permission to 1) take a photograph of people and 2) to post this photograph publicly online or share within the organisation. Even when you have permission of all those in a photograph, always consider the security risks for those involved in the photo before sharing or publishing. If there is any doubt, do not post.
 - d. Never use social media to share confidential information, under any circumstances. All information that is not publicly available should be considered confidential.
 - e. When traveling, be considerate of the press freedom climate of a specific country and inform yourself of our other projects in the region. Ensure not to put yourself at risk, or our organizational goals or the partners we work with.
6. **Consider whether the giving or receiving of a gift or hospitality is appropriate when connected to your work.** This means you must not accept gifts that are offered if this would give the appearance of bias on your part, or would appear to call into question the independence and reputation of your role in combination with Free Press Unlimited.
7. **When on duty, including while traveling for Free Press Unlimited, ensure that practices of providing entertainment at Free Press Unlimited expense take place in appropriate and duly authorised circumstances and that it is never done in violation of the ethical principles of the organisation.** In the

case of governmental officials, hospitality should be avoided if the practice could jeopardise the integrity of such officials or the organisation.

8. **Ensure that you report to work in a condition fit to perform your duties and are not negatively influenced by drugs, alcohol or any other substances** (which includes, but is not limited to, illegal drugs, controlled substances or misused prescription medication). The same way, it is absolutely prohibited to possess, sell, use, transfer or distribute illegal drugs or controlled substances while working for Free Press Unlimited. When traveling on behalf of Free Press Unlimited and while off duty, you must keep in mind the national laws and security rules in place when using substances, including refraining from all use in countries where it is strictly prohibited.
9. **Avoid causing environmental harm and use resources responsibly.** You will not intentionally or negligently contribute to environmental damage and will, within the scope of your role, work to prevent it. You ensure to the extent possible that goods and services purchased are produced and delivered under conditions that do not involve the abuse or exploitation of any person and have the least negative impact on the environment.

2.2.3 Individual Accountability

2.2.3.1 Conflict of interest

Conduct your work for Free Press Unlimited in a way that avoids conflict of interest or the appearance of a conflict of interest. This means conducting your work based on duty, without the influence of personal interests. This includes not allowing your relationships, external activities, or beliefs, including political and religious views, to affect your work. You must disclose any conflicts of interest. If in doubt about whether something could be regarded as a conflict of interest, you must always disclose it to your contact person at Free Press Unlimited.

2.2.3.2 Significant Personal Relationships

Significant Personal Relationships include, but are not limited to, spouses, partners, family members, dating or physical relationships and close friends. At Free Press Unlimited we value the freedom for everyone to choose who they want to love and the quality of the relationship they hold with their loved ones. And while we respect this right, it is also important to maintain a

professional, respectful and positive atmosphere within the workplace. Therefore, the following guidelines regarding personal relationships are to be adhered to:

Romantic relationships

1. Individuals working for or on behalf of Free Press Unlimited who enter into a romantic or intimate relationship with another individual working for or on behalf of Free Press Unlimited should disclose the relationship to their contact person at Free Press Unlimited. Even in cases where you do not have any direct influence over your significant other's projects, performance feedback or rating, please report it to your contact person at Free Press Unlimited to help prevent potential conflicts of interest and ensure transparency.
2. Individuals working for or on behalf of Free Press Unlimited involved in a personal relationship must ensure that their personal interactions do not interfere with their professional responsibilities or create conflicts of interest. This includes avoiding preferential treatment, biased decision-making, or the perception thereof.
3. Regardless of personal relationships, all individuals working for or on behalf of Free Press Unlimited are expected to maintain a professional demeanour and adhere to company policies and codes of conduct at all times. Conduct that is disruptive, harassing, or discriminatory in nature will not be tolerated.
4. It is important to maintain professional boundaries in all interactions with other individuals, regardless of personal relationships.
5. Individuals working for or on behalf of Free Press Unlimited who experience discomfort or adverse effects due to personal relationships are encouraged to seek support from Free Press Unlimited, e.g. by contacting their contact person at Free Press Unlimited or to reach out to the HR department of Free Press Unlimited. Confidentiality will be respected, and steps will be taken to address the situation appropriately.

3. Undesirable Behaviour

Free Press Unlimited aims to create a working environment where people treat each other with trust and respect and where everyone feels responsible and proud for the results of their endeavours and the good reputation of Free Press Unlimited. As individuals working for or on behalf of Free Press Unlimited, it is important to recognise that your behaviour, both on- and off-duty, may reflect on the organisation. This means that you must avoid the forms of misconduct described below, while being aware that these examples are not meant to be exhaustive.

3.1 Bullying

What it means: All forms of harassment with a structural character, of one or more individuals working for or on behalf of Free Press Unlimited towards any other individual(s) working for or on behalf of Free Press Unlimited. An important element regarding bullying at work is the recurrence of that behaviour over time.

Nota bene:

- Whether a behaviour is considered unwelcome depends on the viewpoint of the affected person. Whether the behaviour could reasonably have been expected to cause offence is assessed based on Free Press Unlimited's values, principles and standards for a respectful working environment.
- Bullying usually implies a series of incidents or a pattern of behaviour. It may take the form of words, gestures, visuals, actions or inactions.
- The term 'offence' has a broad meaning, which includes to annoy, alarm, intimidate, demean, belittle, or humiliate one another.

3.2 (Sexual) Harassment

What it means: Any form of unwelcome verbal, nonverbal, written or physical conduct whether sexually explicit or suggestive in nature or not, whether a single or repeated occurrence, that might likely cause harm to the affected person. It covers verbal, non-verbal and written behaviour, as well as physical acts.

Nota Bene:

- Whether a behaviour is considered unwelcome depends on the viewpoint of the affected person. Whether the behaviour could reasonably have been expected to cause offence is assessed based on Free Press Unlimited's values, principles and standards for a respectful working environment.

- While sexual harassment usually involves a pattern of conduct, it may also occur as a single incident.
- The term 'offence' has a broad meaning, which includes to annoy, alarm, intimidate, demean, belittle, or humiliate another.

3.3 Sexual Abuse

What it means: A sexual behaviour or act forced upon a person. It means touching a person's private body parts (even through clothing) or having other sexual contact with a person, without that person's consent or by force, threat of force, surprise, manipulation or under coercive conditions. Sexual abuse covers a broad range of unwanted sexual behaviour involving contact with private body parts, from touching to physical assaults of a sexual nature.

3.4 Sexual exploitation

What it means: An attempt or actual use of authority, influence or control over resources to pressure, coerce or manipulate a person to provide sexual favours in exchange for resources or the offer of resources.

Nota Bene: It involves an abuse of vulnerability or power differential for sexual gain personally or for a third party. The authority, influence or control over resources can be actual or perceived.

In line with international standards to not have sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or any other reason) recognising the inherent unequal power dynamics involved, and that such behaviours can undermine the integrity and credibility of our work.

3.5 Direct Discrimination

What it means: Any unfavourable treatment or arbitrary distinction based, in whole or in part, on a person or group's actual or perceived race, sex, gender, gender identity, gender expression, sexual orientation, religion, nationality, ethnic origin, disability or illness, age, belief, political opinion, marital status, language, social origin or other characteristics that contribute to a person or group's identity.

Nota Bene: Exceptions may apply if there is a legitimate aim that can be objectively justified for the context of the work and the means of achieving that aim are appropriate and necessary.

3.5.1 Indirect Discrimination

What it means: An apparently neutral rule, measure or course of action affects people with a certain religion, belief, political opinion, race, sex, nationality, marital status, age, or sexual orientation or with a disability or chronic illness especially.

Nota Bene: Exceptions may apply if there is a legitimate aim that can be objectively justified and the means of achieving that aim are appropriate and necessary.

3.6 Abuse of power

What it means: The improper use of a person's power to the disadvantage of another person usually in a dependent or vulnerable role.

Nota Bene: Behaviour is considered to be improper if a person uses the power attributed to them, whether actual or perceived, for purposes other than to fulfil their duties and responsibilities.

3.7 Exploitation

What it means: Exploitation means using authority, influence or control over resources to pressure, coerce or manipulate a person to do something in exchange for resources or offer of resources.

Nota Bene: Exploitation involves an abuse of vulnerability or power differential for gain personally or for a third party. The authority, influence or control over resources can be actual or perceived.

3.8 Aggression + Violence

What it means: Incidents where an employee is being physically, digitally, legally, or psychologically harassed, threatened or attacked under circumstances directly related to work.

Nota bene: Aggression and violence refer to behaviour such as verbal abuse (swearing, insulting) and physical violence (kicking, hitting, using a weapon). It can also involve psychological violence: threatening, intimidation, pressuring, threatening someone's family situation and damaging properties.

3.9 Substance Abuse

What it means: The use of alcohol or drugs by any individual working for or on behalf of Free Press Unlimited in such a manner that it influences their behaviour or work and may affect the well-being or safety of stakeholders and/or the interests and reputation of Free Press Unlimited.

Nota Bene: Substance abuse is not only harmful to health and safety; it can cause or contribute to other forms of misconduct. If you are using any substance that may impair alertness or judgement, or witness a colleague who may be impaired and, therefore, possibly impact the safety of others or Free Press Unlimited's interests, you should report it to the HR department or your line management. We encourage anyone who may have an alcohol or drug problem to seek assistance.

4. Report and complaint procedures & routes for assistance

All individuals and/or representatives (including organisations) working for or on behalf of Free Press Unlimited, are expected to abide by our work ethics and integrity as set out in this document and refrain from any undesirable behaviours as described above. Failure to do so may result in disciplinary actions, up to and including (immediate) termination of contract.

As a representative of Free Press Unlimited, if you experience an undesirable behaviour, you can report this through the channel you are most comfortable with, such as your contact person at Free Press Unlimited or by e-mail via our website. You can also file an official complaint through the Integrity Committee which involves a formal procedure (see below). Free Press Unlimited also takes measures, as appropriate, to safeguard the wellbeing of reporters, complainants, subjects, and witnesses.

4.1 Integrity Committee

Purpose and Role

The Integrity Committee promotes ethical conduct and integrity within Free Press Unlimited. It handles reports of suspected misconduct, breaches of the Code of Conduct, or other unethical behaviour, investigates these independently, and advises management on appropriate actions. The Integrity Committee operates impartially, maintains confidentiality, and ensures whistleblowers are protected.

Composition and Procedures

You are free to directly send an official complaint to Free Press Unlimited's Integrity Committee, which will formally investigate the received complaint. The Integrity Committee comprises three permanent members: a Chairperson, a Secretary, and a Staff Representative appointed by the Works Council.

The Integrity Committee operates independently:

- Its members must not be involved in the issues reported.
- They may not be hierarchically subordinate to the Defendant.
- Members with potential conflicts of interest must withdraw.

- Replacement procedures are in place.
- If admissible, the Committee may appoint independent (external) investigators.

All official complaints received by the Integrity Committee are treated with confidentiality to the extent possible, taking into account its interests and those of its stakeholders, and in line with the [Data Protection Policy](#) and relevant national laws and regulations. If a complaint addresses a suspected misconduct the 'Regulations for reporting suspected misconduct' will apply.

You can reach the Integrity Committee via this email address: complaints@freepressunlimited.org or via the form on our website: <https://www.freepressunlimited.org/en/complaint>

4.2 Regulations for reporting suspected misconduct

Free Press Unlimited is committed to maintaining the highest standards of integrity and encourages External Parties to report any suspected misconduct, including fraud, corruption, bribery, conflicts of interest or other serious integrity violations.

Reports can be submitted through the Free Press Unlimited Complaints and Reporting mechanism, available on the [Free Press Unlimited](#) website. All reports will be handled confidentially.

4.3 Disciplinary measures

This document is an integral part of the working terms and conditions of Free Press Unlimited. Any individuals working for or on behalf of Free Press Unlimited, regardless of their contract, who does not comply with the Code of Conduct, may be subject to disciplinary measures, in accordance with their type of contract - which may include, (but are not limited to):

1. Oral and written warnings;
2. Mandatory trainings;
3. (Immediate) discontinuations of temporary contracts; and
4. (Summary) termination of the working relationship.

The nature and extent of the action to be taken will be decided by the management of Free Press Unlimited, if necessary, after consultation with the Integrity Committee, HR and the Executive Director. In some circumstances, violation of the Code of Conduct may be handed to the police or prosecution authorities in connection with a criminal investigation.

For more information on complaints channels and Free Press Unlimited's process for addressing complaints, please contact your contact person at Free Press Unlimited or the HR department at Free Press Unlimited.

5. Acknowledgement of Receipt

All individuals and/or representatives (including organisations) working for or on behalf of Free Press Unlimited, will be provided with a copy of the most recent version of the Code of Conduct upon the start of their contract for Free Press Unlimited and will have online access to the most recent version of this Code of Conduct. You must sign a statement:

- On the date of receiving the Code of Conduct; or
- Whenever it is expressly established by Free Press Unlimited,

including that you:

- have read and understood the Code of Conduct in its entirety;
- have been given the opportunity to make questions about its contents; and
- shall observe and comply with the provisions of the Code of Conduct.

Free Press Unlimited reserves the right to amend this Code of Conduct through unilateral amendment. Amendments will be proposed and adopted in accordance with applicable internal (consultation) policies.

6. Miscellaneous

Free Press Unlimited may unilaterally, amend, modify, suspend or terminate any provision in this Code of Conduct at any time without prior notice. You will be informed of and bound by any such changes.

In the unlikely event of any conflict between the provisions of the individual terms and conditions of employment or engagement and the provisions of the Code of Conduct, the individual terms and conditions will prevail.