



Contents

Team Fred	1
Our Code of Conduct	1
What is it?	1
Comply with the law	2
Refer to the Code and ask questions	2
Make a commitment	2
The Fred Hollows Foundation Global Values	2
The Fred Hollows Foundation NZ Operational Values	2
Te Tiriti o Waitangi	3
Integrity	3
Using our digital communication systems	3
Using social media	4
Be free of conflicts of interest	5
Using Foundation resources	5
Responsibility	6
Safety and wellbeing	6
Crisis, emergency and business disruption management	7
Avoiding alcohol and other drugs	7
Promote environmental sustainability	8
Respect	8
Diversity and inclusion	9
Preventing bullying and harassment	9
Abuse of privilege/power and child abuse	10
People-centred programmes	11
Accountability	11
Financial stewardship	11
Committing to contracts and expenditure	12
Accurate and complete information, records, reporting and accounting	12
Protecting privacy and confidentiality	13
Information security	13
Protecting and respecting our property	14
Local ownership of development activities	15
Honouring our commitment to external agreements	15
Glossary	16
Signatory page	16
Agreement to abide by the Code	16
Document control & amendment history	17

TEAM FRED

Doing the right thing

OUR CODE OF CONDUCT

WHAT IS IT?

The Code of Conduct (Code) sets out what we expect from every worker regardless of location, and confirms our commitments to our people, our patients, our partners, our students and stakeholders.

The Code brings together all our policy principles and provides a working guide for all workers to 'do the right thing' when making decisions in our daily activities. It's not a 'nice-to-have' document – it is essential.



COMPLY WITH THE LAW

Our Code reinforces our commitment to both the letter and spirit of our legal obligations and our policies, standards and business principles in every country in which we work. The Foundation observes and complies with all applicable local laws, rules and regulations. Workers are expected to be familiar with the relevant laws and regulations and if there is a difference between a local legal requirement and our Code, apply the most stringent standard. If in any doubt, contact your manager.

We do however recognise that local laws and cultures differ considerably from one country to another, to this end the Code is informed by international and United Nations standards and the New Zealand Council of International Development (CID) Code of Conduct. This code is subject to relevant international human rights law, wherever you work.

REFER TO THE CODE AND ASK QUESTIONS

Please read the Code and refer to it often. It isn't something you read once and forget about. It's your guidebook for doing what's right.

To supplement the general guidance of the Code, The Foundation has a comprehensive suite of specific policies and standards and you will see some of these are linked within the Code.

Take the time to understand the policies that are referred to throughout the Code and how they apply to you in your role. You are encouraged, and expected, to seek additional help whenever you have questions or aren't sure about the right course of action. Your manager is available to help you if needed.

MAKE A COMMITMENT

We are all expected to 'do what's right' in our daily work and actions:

- Act safely, ethically and responsibly – taking pride in your actions and decisions.
- Comply with the principles in this Code and fulfil your legal and regulatory obligations.
- Ensure you are sensitive to, and respectful of, local customs and culture.
- Hold your colleagues accountable for behaving ethically and following this Code and legal requirements.
- Speak up if you see unsafe or unethical behaviours or if it breaches our Code.

THE FRED HOLLOWES FOUNDATION GLOBAL VALUES

- 1. Integrity:** We stand up for what is right
- 2. Empowerment:** We make a difference
- 3. Collaboration:** We are stronger together
- 4. Action:** We focus on results

THE FRED HOLLOWES FOUNDATION NZ OPERATIONAL VALUES

Our Values are the basis of how we conduct ourselves within New Zealand and any country in which we work.¹ They reflect the commitment we make to our people, our partners, our supporters and those who benefit from our work. They are at the heart of our Code of Conduct.

¹ Please refer to the Glossary for a list of The Foundation entities.



We act with:

- 1. Integrity:** Our relationships with supporters, partners and those with whom we work are carried out with integrity, transparency, honesty and objectivity.
- 2. Responsibility:** We protect the health, wellbeing, safety and security of our workers,² patients and students.
- 3. Respect:** We treat people fairly, with dignity and respect.
- 4. Accountability:** We have a responsibility towards our people, property and information, as well as laws, regulations and policies that are relevant to the areas in which we operate.

TE TIRITI O WAITANGI

The Foundation acknowledges the fundamental importance of Te Tiriti o Waitangi to our work in Aotearoa New Zealand and we seek to understand, respect, and be informed by the principles of Te Tiriti o Waitangi in all aspects of our work.

INTEGRITY

Our relationships with supporters, partners and those with whom we work are carried out with integrity, transparency, honesty and objectivity.

- We communicate honestly, responsibly and with transparency with all stakeholders within the bounds of commercial sensitivity.
- We avoid any activity or contracts that may lead to, or suggest, a conflict of interest between personal activities and The Foundation.
- We use business resources in the best interest of The Foundation and not for personal gain.
- We abide by the International Donor Bill of Rights.

Policy and procedures: Anti-corruption and Anti-fraud, CID Code of Conduct, Content Gathering and Use, Cyber Security, External Complaints, International Donor Bill of Rights, Privacy & Information Handling, Recruitment.

USING OUR DIGITAL COMMUNICATION SYSTEMS

Frequent use of The Foundation's intranet, internet, phone and email systems are critical to our jobs. The Foundation invests in strengthening our digital workforce and provides access to a range of information and communications technology (ICT) resources to connect and collaborate. These systems and resources, such as Wi-Fi, are intended to be used for business purposes. As a user of these resources, you have access to valuable information, sensitive data and internal and external networks that must be protected and used responsibly.

What this means for you:

- Use digital communication systems and other ICT resources in a responsible, ethical and legal manner. Don't use them for any illegal, unethical, or objectionable activities such as gambling, pornography or other inappropriate subject matter.
- Don't use Foundation ICT resources for outside businesses or personal gain.

² Please refer to the Glossary for a full definition of "worker".

- You are personally accountable and liable for all activities associated with your user accounts and Foundation equipment.
- Incidental personal use of ICT resources (email, internet, social media) at work is acceptable as long as:
 - It doesn't affect your, or others', job performance or productivity.
 - It doesn't interfere with operations or system performance (e.g. sending large personal files), consume significant time and/or incur unnecessary costs.
 - It doesn't create risk for The Foundation as a result of your personal use.
 - It doesn't violate any Foundation policies.

USING SOCIAL MEDIA

We recognise the importance and benefit of communicating through social media. We want to empower all our employees to be good ambassadors for our brand but you must be mindful of what you post online as it could have unintended consequences. Follow these general guidelines when using social media both inside and outside of The Foundation:

- *Think before you post:* Remember that whatever you share may be public for an indefinite period of time (even if you attempt to delete it) and will be associated with you, your profile, and The Foundation.
- *Be truthful, accurate, and respectful:* Don't make statements that are false, misleading or unsubstantiated. Respect other people's views, even if you disagree, and always be polite and courteous.
- *Use good judgement and common sense:* Don't post items that could reflect negatively on The Foundation. Avoid topics that could be inflammatory or inappropriate, including work-related concerns or issues.
- *Do no harm:* Don't post material considered to be illegal, abusive, discriminatory, defamatory or offensive.

What this means for you:

- Separate your personal social media sites and accounts from work-related ones.
- Avoid using The Foundation's sites to distribute personal communications and never use official Foundation images on personal social media, unless sharing a direct post of The Foundation.
- Clearly show when posts or comments are your own views, not those of The Foundation, when you talk about work-related matters.
- Don't disclose information, misuse personal data or post photos of others without their knowledge and permission.
- Be mindful of copyrights, trademarks and intellectual property rights of others. Never post copyrighted material without the appropriate permissions (including published music, movies or video content).
- Honour any confidentiality and non-disclosure requirements, even on personal sites.
- Never post information about legal matters.

Q. Am I allowed to say where I work on my social network profile?

A. Yes. You can disclose on your 'About' page or bio that you work at The Foundation, which part of the organisation you represent and what your responsibilities are. You may include a link to The Foundation's website.



Q. I have an issue with my manager and said so recently in my Facebook page. Was this wrong?

A. Yes. You should discuss any issues or concerns you have about your job or work environment with your manager using the normal processes, rather than posting to social media sites.

Q. I saw a negative post on social media about The Foundation. Should I respond?

A. No. As a rule, avoid the temptation to respond directly to negative posts about The Foundation on social media unless you respond with approved messaging from the Communications Team. Keep in mind that we have dedicated teams tasked with responding to customer enquiries or complaints. When in doubt, contact the Communications Team.

BE FREE OF CONFLICTS OF INTEREST

We must all be free from actual, perceived or potential conflicts of interest. A conflict of interest can happen if an employee's personal, social, financial or political activities interfere (or could interfere) with their judgement in work-related decisions. Whenever possible, interests that may cause a conflict of interest should be declared. If they arise, always disclose them immediately, even if it is only an appearance of a conflict of interest that exists.

What this means for you:

- Act in The Foundation's best interest and make objective decisions.
- Discuss conflict of interest concerns with your manager and report all actual, perceived or potential interests to the Executive Director who will determine if they need to be added to the Interests Register.
- Remove yourself from decisions or processes where you have a personal interest including hiring, promoting, rewarding, or advancing any relative, close friend or partner.
- Declare all gifts and offers of gifts/discounts you receive as a direct consequence of working for The Foundation in accordance with the Gift Register process. Workers are not able to accept valuable or otherwise inappropriate gifts.
- Never affect or influence the terms and conditions of a contract for service, or for employment, of any employee, contractor or supplier who is a relative, close friend or partner.
- Avoid working or consulting for, or providing professional services to, anyone external that you deal with as part of your job for The Foundation.
- Never use business resources for personal political activity, make political donations in The Foundation's name, or give the impression that The Foundation endorses any candidate, campaign or political issue.

USING FOUNDATION RESOURCES

Resources are provided to you to be able to achieve the requirements of your role. We must all use Foundation resources responsibly and for legitimate purposes. All Foundation resources have an economic value, so use them effectively.

Common Foundation resources include:

- ICT resources and computer equipment including access to electronic information, networks, software, internet, systems and equipment such as desktops, laptops, phones, and mobile devices.
- Business-related travel.
- Budgets, expenditure and Foundation bank cards.
- Office furniture, equipment and supplies.

- Branded material and official Foundation images and content.
- Foundation-provided vehicles and car parks.

What this means for you:

- Use business resources and assets for Foundation business. This includes money, equipment, materials, information and time.
- Only use resources that you are authorised to use and complete all necessary authorisations.
- Only access or use authorised resources or information where there is a legitimate business need and not for personal interest or gain.
- Use resources responsibly, efficiently and cost-effectively.
- Don't engage in personal activities during work hours that interfere with you fulfilling your job responsibilities.
- Take all reasonable and necessary steps to protect The Foundation's confidentiality, resources and assets, including the prevention of theft.

RESPONSIBILITY

We operate safely and responsibly.

- We protect the health, wellbeing, safety and security of our employees, patients, and the communities in which we operate.
- We will operate our business with discipline and excellence to ensure sustainability, resilience and effectiveness.
- We will not tolerate anyone abusing alcohol or other drugs or substances such as betel nut or kava in the workplace.³
- We will promote and practise environmental sustainability for present and future generations as part of all development initiatives.

Policies and procedures: Alcohol and Drug, Child Safeguarding, Clinical Governance, Crisis Management, Health & Safety, Risk & Security Management, Treasury, Vehicle.

SAFETY AND WELLBEING

Health, safety and wellbeing are a top priority at The Foundation.

We are committed to achieving a zero-harm work environment and instilling a culture of safety, wellbeing and continuous improvement. We continually evaluate and improve our workplace safety. We expect everyone at The Foundation to behave in a safe and responsible manner at all times and to take responsibility for continual risk assessment and mitigation during their daily activities.

What this means for you:

- You are responsible for your own safety and wellbeing, and the safety of your colleagues and patients.
- Only undertake work if you are medically fit for duty, sufficiently rested and alert enough to carry it out.
- Comply with applicable safety laws and follow the safety procedures and requirements detailed in the policies and procedures of The Foundation.

³ Please refer to the Glossary for a full definition of "workplace".



- Never compromise on safety or knowingly create situations where the safety and wellbeing of any person is put at risk. Intervene where you see unsafe practices.
- Prevention is critical. Identify and report any hazards.
- Report events immediately where safety and wellbeing have been compromised, including any incident, accident, injury, illness, unsafe or unhealthy condition.
- If injured, ensure you do all you can in your recovery and rehabilitation for a safe and timely return to work.
- Always drive safely, responsibly and legally when operating Foundation vehicles or on Foundation premises.
- Where your attention to safety is critical, limit using mobile devices in the workplace.

CRISIS, EMERGENCY AND BUSINESS DISRUPTION MANAGEMENT

Crisis, emergency and business disruption management is important to protect our people and reduce any damage or loss. We must retain a high level of preparedness to respond to any type of business interruption in any location where we might have people, property or assets. Effective crisis, emergency and business disruption planning ensures we're committed to health and safety, minimising damage and impact to The Foundation and keeping our activities going after any disaster.

What this means for you:

- Know your individual responsibilities and follow crisis, emergency and business disruption procedures, including knowing local emergency contact details.
- Assist in developing and implementing local crisis, emergency and business disruption plans for your business area when and if requested.
- Continually assess risks and any financial, reputational and other non-financial threats that may impact your business area.
- Test and practise your crisis, emergency and business disruption procedures to improve response preparedness.
- Debrief following an event to ensure lessons are learned and actioned.

AVOIDING ALCOHOL AND OTHER DRUGS

Alcohol and other drugs must never affect us in our work. Our safety, and that of our people, partners, supporters and those who benefit from our work, depend on it. Therefore, you must maintain a zero-blood alcohol level and be drug free while working unless at a Foundation-sanctioned event. This includes being aware of the possible negative impacts of legal drugs, such as prescription medication, and mitigating any risk this may pose. Any possession, use, sale or distribution of illegal substances at work will be treated very seriously.

The Foundation will provide support for workers adversely affected by addiction to alcohol or other drugs.

What this means for you:

- Never, under any circumstances, work while affected by alcohol or any other drug that impairs judgement, performance or behaviour. Be drug free and maintain a zero-blood alcohol level.
- Never drive a vehicle used for business purposes during work hours or on work duties if you aren't drug and/or alcohol free.
- Don't use, sell, distribute or be in possession of alcohol or other drugs while working or while on our premises.



- Discuss with your manager prescription medication or other legal drugs which may impair your ability to work.
- Don't store or consume alcohol on our premises unless it's authorised (e.g. sponsored and supervised functions).
- Report in confidence to your manager or People and Culture Advisor any concerns about the use of alcohol or drugs that may impact the health and safety at work of themselves or others.
- You may be required to undergo alcohol and other drug testing for safety sensitive roles and when there is cause.

PROMOTE ENVIRONMENTAL SUSTAINABILITY

The Foundation is committed to conducting activities in an environmentally sustainable manner that is consistent with international standards and practices and reflects local understandings of stewardship in relation to the environment.

What this means for you:

- Comply with all relevant legal obligations relating to hazardous substances and waste management.
- Seek to reduce waste.
- Seek to improve environmental performance.
- Be informed by an understanding of the environmental impact in relevant activities.
- Actively work to reduce the environmental impacts of operations including the use of energy efficient systems and technologies.

RESPECT

We treat people fairly, with dignity and respect.

- We pursue equality of opportunity and inclusion for all workers.
- We respect and promote human rights, social justice and equality for all people, embracing diversity.
- We will recruit, select and develop our workers on merit irrespective of age, race, culture, colour, origin, gender, religious beliefs, disability, family or marital status, sexual orientation or other prohibited grounds.
- We will not accept any form of discrimination, harassment or bullying and will ensure that our relationships and behaviour are not exploitative, abusive or corrupt in any way, and will not engage in any form of sexual abuse or exploitation of any persons of any age.
- We will perform at our best, demonstrating professionalism, living our values and operating with acute supporter and patient focus at all times.
- We will proactively address underperformance.
- We will work in good faith, within the appropriate legal framework.
- We trust each other to deliver on our commitments and obligations, and value collaboration as the best means of working together to achieve superior outcomes.
- We will empower our people to enhance their personal potential by offering satisfying and challenging work and career opportunities, investing in development and personal growth.
- We will reward and recognise our people for work which contributes to our vision to end avoidable blindness and vision impairment, and for demonstrating the right behaviours that reflect our values.
- We will respect people's lives outside of work, balancing life activities, and valuing their contribution to society.

- We focus on people's empowerment, democratic ownership and participation in any programme design, implementation, or evaluation.
- We will undertake a rights-based approach to the provision of health services seeking to prioritise the needs of those furthest behind first towards greater equity.⁴

Policies and procedures: Child Safeguarding, CID Code of Conduct, Disability and Development, Gender Equality and Development, Recruitment, Remuneration & Performance, Whistleblower.

DIVERSITY AND INCLUSION

We will value respectful partnerships and achieving cross-cultural understanding while working and learning together in an environment where everyone feels respected and valued. We recognise and celebrate the importance of diversity in our workplace. We will not tolerate any form of discrimination and we respect individuals and their human rights. We should all challenge discriminatory behaviour when we see it. We want everyone to feel empowered to raise any concerns.

What this means for you:

- Create and maintain good relationships with each other and with the public.
- Act fairly and show respect towards others in all your dealings.
- Actively seek, value and draw on the differing knowledge, perspectives, experience and styles present across the Pacific region.
- Be aware of cultural sensitivities when working with others (employees, donors, students or patients).
- Understand your responsibilities under the law regarding equal opportunity.
- Challenge discriminatory behaviour.
- Raise any concerns with your manager.
- Be inclusive in the language you use when communicating.
- Report any incidents that are inconsistent with our commitment to equal opportunity, inclusion and diversity.
- Respect and protect internationally recognised human rights including civil and political, economic, environmental, social and cultural rights.

Q. Who is responsible for delivering our commitment to having an inclusive and diverse workforce?

A: We must all take responsibility for treating people with professional courtesy, dignity and respect. This means valuing them as individuals as well as complying with specific laws and regulations where we operate. All workers are responsible for supporting our commitment to creating an environment where everyone feels valued and respected.

PREVENTING BULLYING AND HARASSMENT

Harassment and bullying can take many forms and can have serious repercussions. Harassment includes language or conduct that may be derogatory, intimidating or offensive to others. Bullying and intimidating behaviour is repeated inappropriate behaviour that undermines someone's right to respect at

⁴ A principle that has been echoed in the recently adopted 2030 Agenda for Sustainable Development and Universal Health Coverage. <https://www.who.int/news-room/fact-sheets/detail/human-rights-and-health>



work. We may initiate disciplinary or legal action against people who harass or bully others. This includes suppliers, supporters and other visitors to our premises.

We respect the rights of all peoples including children, and will contribute to a working environment characterised by mutual respect, integrity, dignity and non-discrimination. We are all responsible for ensuring that harassment and bullying doesn't happen at The Foundation.

We are committed to ensuring a safe environment and culture for all children with whom we come in contact during the course of our work. We strongly condemn all forms of child abuse.

What this means for you:

- Never be derogatory or abusive to or about others.
- Never behave in a way that is unwelcome, intimidating or offensive, including threats, bullying, inappropriate jokes or actions of a sexual nature.
- Discourage others from engaging in this behaviour.
- Make sure your communications abide by our Code no matter how informal you are being.
- Take all harassment and bullying complaints seriously. Managers should immediately address behaviour or conduct that may be offensive.
- Report and encourage others to report incidents of harassment, bullying or retaliation.
- Don't retaliate against anyone who makes a good faith complaint of harassment or bullying, or who co-operates in an investigation of a complaint.
- Use your best endeavours to report any such behaviours or malpractice in the workplace by others.

ABUSE OF PRIVILEGE/POWER AND CHILD ABUSE

We hold a privileged position of power and trust in relation to our partners and the communities that we come from and serve, and we understand that it is important not to abuse our own position in any way.

- We absolutely understand that we do not have sexual relations with children (defined as under 18 years old) or those who benefit from any service or assistance given by Foundation workers, recognising the inherent unequal power dynamics involved, and that such behaviours can undermine the integrity and credibility of The Foundation's work.
- We do not exchange money, offers of employment, employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour, understanding that these standards exist to challenge sexually exploitative and abusive behaviour.
- We ensure that our relationships and behaviour are not exploitative, abusive or corrupt in any way, and will not engage in any form of sexual abuse or exploitation of any persons of any age.
- We fully understand and abide by The Foundation's Child Safeguarding Policy and understand that if we travel we will be required to verify we have undertaken Child Safeguarding training or refresher training within 12 months of traveling.

Q: I am a lecturer/clinician and am attracted to one of my students. Can I ask them on a date, can they ask me?

A: No. Romantic or sexual relationships between educators (such as lecturers, tutors, and visiting specialists) or clinicians and students or patients are prohibited because they create conflicts of interest, perceptions of undue advantage and/or cause people harm. Regardless of who initiates the relationship, it is the educator's responsibility to maintain appropriate romantic and sexual boundaries with students.

PEOPLE-CENTRED PROGRAMMES

We apply an equitable approach to the design, implementation, monitoring and evaluation of development activity that emphasises relationships, learning, adaptation and impact. We are committed to including and addressing the needs and rights of vulnerable and marginalised people and their representatives in all aspects of development activities. These groups may include women, children, people with a disability, Indigenous Peoples, and minorities.

What this means for you:

- Place value on respectful partnerships and achieving cross-cultural understanding while working and learning together.
- Understand the context in which planned activities will occur and continue to review as the context changes.
- Ensure development planning, implementation and evaluation are based on honest and transparent communication and on two-way learning, which leads to continuous improvement in practices.

ACCOUNTABILITY

We have a responsibility towards our people, property and information, as well as laws, regulations and policies that are relevant to the areas in which we operate.

- We will not commit to expenditure without appropriate authorisation.
- We will only spend Foundation money where there is a legitimate business need and where appropriate due diligence has been completed and where the cost is worth the benefit.
- We will consider social, ethical and environmental considerations in our procurement and supply chain decisions.
- We will secure and safeguard our confidential and sensitive information from improper disclosure to prevent harm to The Foundation, our stakeholders, employees or supporters who have trusted us with their information.
- We will protect and safeguard our brand, property, intellectual property and financial assets.
- We will respect people's legal rights to privacy and the confidentiality of personal information. We will only retain the information for the purpose for which we need to perform the activities of The Foundation and meet all other requirements of the Privacy Act in New Zealand and other similar legislation in the other countries in which we operate.
- We commit to realising positive sustainable change, focusing on results, working alongside local partners to achieve positive outcomes for vulnerable populations.

Policies and procedures: Clinical Governance, Credit and Debit Card, Cyber Security, Delegated Authority, Investment, Privacy & Information Handling, Travel, Treasury.

FINANCIAL STEWARDSHIP

We expect all workers to be good stewards of our funding from donors and spend responsibly. Our financial and accounting controls ensure we apply generally accepted accounting principles in our business transactions. Clear policies and strict guidelines are used in our financial planning, budgeting, monitoring and evaluation. We are all responsible for following our policies and legal, financial and accounting regulations. Our managers have an extra duty to ensure that their teams manage expenditure within budget and spend Foundation money carefully.

When assessing value for money, consider: quality, service, reliability, sustainability, compliance with our finance and procurement policies, and any terms and conditions.

What this means for you:

- Understand the financial management responsibilities, policies and processes relevant to your role.
- Understand when you can and when you can't commit Foundation funds.
- Strive to find the best value when spending Foundation money.
- Only spend Foundation funds on legitimate business needs.
- Keep expenditure within budget.
- Ensure your decisions are sound and based on objective information.
- Ensure your expenditure is appropriately authorised.

COMMITTING TO CONTRACTS AND EXPENDITURE

We have defined processes for interacting with suppliers, negotiating supply contracts and making purchasing decisions. Legally binding contracts, with agreed terms and conditions, are required before we can commit our resources. Without these agreements, we are open to financial, commercial, tax and legal risk.

The Delegated Authority Policy (DAP) shows what level of authority you need before committing The Foundation to a contract or expense. Everyone is expected to understand how the DAP rules apply to their role.

What this means for you:

- Only commit to a contract or incur expenses where you are authorised and within your delegated limits.
- Use defined processes and approved suppliers when sourcing and purchasing goods and services.
- Obtain DAP approval for every purchase, requisition commitment or order you make.
- Ask the Finance Team if you're in doubt before ordering a product or service.

ACCURATE AND COMPLETE INFORMATION, RECORDS, REPORTING AND ACCOUNTING

Honest, complete and accurate recording and reporting of information is critical to protecting our credibility, reputation and meeting our legal obligations. We are committed to ensuring our records are complete and accurately reflect transactions and events. This includes all forms of media (paper or electronic) and information, including financial, health, safety, personal or regulatory. We will properly manage the life cycle of our records and only retain them for the period of time necessary to meet our legal requirements and business needs.

We ensure our financial statements are reviewed by independent auditors and that we are completely open and transparent in our dealings with them.

What this means for you:

- Record and report Foundation information honestly, accurately and objectively, with reasonable detail and supporting documentation for all transactions.
- Never make false or misleading entries, or inappropriately alter Foundation records or expense claims for any reason.
- Comply with The Foundation's system of internal controls.

- Be alert for unauthorised payments or invoices, ensuring that no undisclosed or unrecorded or 'off the books' amount, fund or asset is established or maintained.
- Co-operate fully with the Finance Team and external auditors and provide them with accurate information and unrestricted access to necessary resources.
- Report any concerns or irregularities in accounting, auditing or internal controls.
- Understand and follow our data retention standards for creating, retaining and destroying Foundation information.

Failure to keep accurate and complete records, falsifying information or creating misleading information could constitute fraud, with civil and criminal liability for The Foundation and individuals involved.

PROTECTING PRIVACY AND CONFIDENTIALITY

We are committed to protecting confidential or personal information at all times, including that of our patients, students, supporters, employees and business partners. Personal information which can be used to identify someone must be handled responsibly and in compliance with all applicable privacy laws, and only collected for lawful and specific business purposes.

What this means for you:

- Classify personal information as confidential.
- Limit sharing or access to authorised people only, who have a clear business need for that information.
- Keep personal information no longer than necessary to accomplish the legitimate purposes (legal, regulatory or legitimate business need).
- Be aware of local privacy laws, especially when transferring personal information outside of its country of origin.
- Be objective when making written comments about people, as all personal information may be disclosed. Personal information, including your opinions, should be relevant, appropriate, accurate and justifiable.
- Take extra care when using electronic communications which contain personal information, ensuring secure and protected systems are used.
- Return any unsolicited confidential information you receive to the sender or ensure it's deleted. Refer to the Privacy & Information Handling Policy for additional guidance on the handling of personal data and a description of protected information.
- Provide the right of access to information held about an individual including the right to have the information corrected or deleted.

INFORMATION SECURITY

Information is one of our most valuable assets and we must safeguard our proprietary and confidential information at all times. We are responsible for determining whether the information is sensitive, who owns it and the appropriate level of protection it requires. Our security controls manage access to our information and networks to prevent improper disclosure. We limit access to the information to those who have a legitimate business need, following defined procedures.

What this means for you:

- Protect your password
 - Don't share your password with anyone or write it down.
 - Never let other people access the internet using your network login.



- Don't let your computer 'remember' your passwords unless your computer device is encrypted.
- Protect information and data at all times
 - Look after laptops, mobile devices and storage devices when you are not in the office, have those devices with you and never leave your laptop unattended, or in the car visible to others.
 - Store classified information correctly and dispose of it securely when it's no longer needed.
 - Avoid leaving sensitive and confidential documents in meeting rooms, on your desk (lock away if necessary), or on printers (use 'secure printing').
 - Never save sensitive or confidential information on unauthorised systems or storage devices unless those storage devices are Foundation-issued encrypted storage devices.
 - Lock your computer screen if you leave your computer unattended and switch off your computer monitors at the end of the day.
 - Report incidents, breaches or lost laptops or mobile devices immediately to the ICT Service Provider and Chief Security Officer.
- Think before you click
 - Be careful when opening attachments from unknown addresses.
 - Only use authorised software and hardware.
 - Don't click links which may take you to unsafe websites.
 - If in doubt, seek the advice of the Chief Security Officer or ICT Service Provider.

PROTECTING AND RESPECTING OUR PROPERTY

Our brand, trademarks and copyrights are the Intellectual Property (IP) of The Fred Hollows Foundation. They are valuable assets that we must safeguard under the condition of the Trade Mark Licence Agreement between The Fred Hollows Foundation and The Fred Hollows Foundation NZ, as well as the applicable laws and regulations that help us protect our IP from theft or misuse.

IP not subject to the Trade Mark Licence Agreement that also requires safeguarding includes:

- Sales, marketing and other company databases.
- Marketing strategies and plans.
- Research and technical data.
- Business ideas, processes, proposals or strategies.
- New product and/or package design and development.
- Software bought or developed by The Foundation.
- Information used in trading activities including fundraising, marketing and donor strategies.

We must also respect the IP rights of others. Never knowingly violate another company's IP and always obtain the necessary licenses and permissions before copying, using or distributing it.

What this means for you:

- Comply with The Foundation's Style Guide.
- Never allow any third party to use our brand or trademarks without first discussing it with the Communications Team.
- Protect all confidential, proprietary or other IP information regardless of the method used (e.g. printed material, electronic files, email, verbal conversations), even after you leave The Foundation.
- Retain confidential, proprietary or other IP information and only share it with those who are authorised and have a business need to know the information.



- Ensure non-disclosure agreements are in place before disclosing sensitive or confidential information to outside parties.
- Avoid disclosing any details of new products, designs, patents, trademarks or other confidential information or IP in public places, or with friends and family, or anyone not authorised to access it.
- Report any suspected misuse or theft of logos, trademarks or other IP of The Fred Hollows Foundation and The Fred Hollows Foundation NZ to the Finance & Operations Director.
- Report any activities that infringe on the IP of others. Gain appropriate permissions before using the IP of others.
- Report any lost or stolen confidential information or other property immediately to the Chief Security Officer.
- Violations of IP laws can be costly. Discuss any questions or concerns about safeguarding IP with the Engagement Director or Finance & Operations Director.

LOCAL OWNERSHIP OF DEVELOPMENT ACTIVITIES

The Foundation prioritises perspectives and solutions that are locally-owned, sustainable and effective. We are focused on building and maintaining strong, honest and robust relationships with local partners.

What this means for you:

- Seek the genuine, informed, consensual participation of local people in development activities.
- Ensure that local people have the opportunity to authentically contribute to the design, implementation, monitoring and evaluation of these activities.
- Ensure that our services are patient-centred.

HONOURING OUR COMMITMENT TO EXTERNAL AGREEMENTS

The Foundation is accountable and needs to evidence compliance to a number of external agreements. These include but are not limited to:

The CID Code of Conduct: Holds international development organisations based in New Zealand to account to ensure good practice across the sector, aiming to improve international development outcomes and increase stakeholder trust by enhancing the transparency and accountability of signatory organisations and serves as a guide to good practice. The CID Code sets out standards in three areas of accountability: programme principles, public engagement, and organisation.

The Trade Mark Licence Agreement: Sets out the terms under which The Fred Hollows Foundation NZ operates as a condition of The Fred Hollows Foundation granting a trade mark licence to The Fred Hollows Foundation NZ. The agreement covers many aspects of operations from fundraising and marketing, resource mobilisation and reporting.

Agreements with partner countries: The Foundation has developed and signed a number of memorandums of association (MOUs) with partner countries that set out how we work together to achieve our joint purpose of ending avoidable blindness. These set out obligations that both parties need to uphold.

What this means for you:

- Make yourself familiar with the external agreements that are pertinent to your area of work.
- Ensure you uphold the principles and are compliant with obligations of these agreements.
- In the case of the Trade Mark Licence Agreement, your Director will need to sign quarterly compliance checks.



GLOSSARY

The Foundation includes:

The Fred Hollows Foundation (NZ)

The Fred Hollows Foundation NZ Pacific Eye Institute Limited

The Fred Hollows Foundation PNG Inc.

The Fred Hollows Foundation NZ Solomon Islands Trust Board (Incorporated)

Worker means:

Individual who carries out work in any capacity for The Foundation in any jurisdiction including: employers; employees; trustees; contractors; people with responsibility for work and workplaces; volunteers doing work activity; people receiving work experience; people receiving on-the-job training; people working from home and mobile workers.

Workplace means:

A place where work is being carried out, or is customarily carried out, for The Foundation and its entities. It includes any place where a worker goes, or is likely to be, while at work.

SIGNATORY PAGE

AGREEMENT TO ABIDE BY THE CODE

All workers of The Foundation must acknowledge that they've read, understood and agree to abide by the Code. We are required to do this when we are engaged and to renew this commitment annually.

Please note that the Code is not a contract of employment, and The Foundation may interpret, modify or rescind some or all of the Code provisions, as well as related policies and procedures, at any time.

Signed: _____

Date: _____



Document control & amendment history

Document Control			
Document Title	Code of Conduct		
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Effective Date	16 July 2019	Approved by	FHFNZ Board of Trustees
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Amendment History			
Version No.	Purpose/Change	Author	Date
1.0	New document	Engagement Director	09.07.19
1.1	Non-material updates	Executive Director	22.01.20