



# CODE OF CONDUCT

Functional Areas	Talent & Culture (for Associates other than Board members) Governance (for Board members)
Business Owners	Chief Operating Officer Chair of the Board of Directors (for Board members)
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Approvers	Chief Executive Officer Governance and Nominating Committee ( <u>GNC</u> ) Board of Directors ( <u>Board</u> )
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	April 12, 2019
Review Date	This document shall be reviewed as deemed appropriate, but no less frequently than 3 years following the date of approval.

# 1. INTRODUCTION

Plan International Canada Inc. (**Plan Canada**) has a superior reputation as an international, child-centered, community development organization. We are dedicated to serving children, their families and the communities in which they live throughout the countries in which Plan Canada operates.

As an Associate of Plan Canada, you represent Plan Canada in all that you do. It is therefore important that you understand the standards we expect from you, both in terms of maintaining and promoting a positive image of Plan Canada and, most importantly, demonstrating respect for the rights of the children, families and communities that we serve. We have developed this *Code of Conduct* to assist you in understanding why it is important to conduct yourself in a professional and ethical manner and what business practices Plan Canada promotes.

# 2. APPLICATION AND SCOPE

This *Code of Conduct* applies to all **Associates**.

“**Associates**” refers to all Plan Canada Employees, Board members, volunteers, students, interns, consultants, contractors and representatives of partner organizations engaged by Plan Canada.

“**Board**” means the Board of Directors of Plan Canada.

“**Employee**” means a person who has entered into an employment relationship with Plan Canada including full-time and part-time, permanent and temporary employees.

“**Visitor**” means a person who visits Plan Canada’s offices or programs and may come into contact with Children and Young People including media, visiting sponsors or donors, or researchers.

This *Code of Conduct* is not intended to cover every situation which Associates may face. No *Code of Conduct* can offer a complete guide to cover all possible situations that might be encountered. From time to time, Associates will have questions as to the propriety of an action or the application of this *Code*. Employees should discuss these questions with their People Leader who will seek advice from others, as necessary. Board members should consult with the Board Chair, and other Associates should consult with their relationship manager.

This *Code of Conduct* includes:

Appendix 1 – *Plan Canada Code of Conduct Acknowledgement with Annex A – Plan Canada Safeguarding Children and Young People / Preventing Sexual Harassment, Exploitation and Abuse Code of Conduct.*

Appendix 2 – *Plan Canada’s Reporting and Whistleblowing Policy and Procedures.*

This *Code of Conduct* should also be read and understood in conjunction with the following associated Plan Canada Policies, as may be amended from time to time:

- our *Safeguarding Children and Young People Policy and Procedures*;
- our *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy*
- our *Procurement Policy* and related Procedures;
- our *Privacy Policy, Employee and Associate Privacy Policy, and Confidentiality Agreement*;
- our Information Technology and Security policies;
- our *Expense Reimbursement Policy and Expense Reimbursement Guidelines*; and
- our *Workplace Discrimination, Harassment, Violence and Bullying Prevention Policy and Program*.

### 3. PURPOSE

The purpose of this *Code of Conduct* is to:

1. Articulate the common values and behaviours expected of Plan Canada Associates;
2. Ensure that Plan Canada Associates treat each other and the children, youth and communities we work with, with dignity and respect;
3. Ensure that Plan Canada Associates support our objective of providing a safe and inclusive workplace; and
4. Encourage Plan Canada Associates to report suspected wrongdoing or irregularities as soon as possible.

### 4. POLICY STATEMENT

*Our work is based on deeply held values and a clear purpose. We will ensure that our shared values and behaviours become embedded in our culture and the guiding principles behind all our decision-making.*

*We frequently work in complex and insecure environments and in situations where we are in positions of power and trust in relation to the children, young people and communities we work with, with other organizations and one another. We must, under no circumstances, abuse this power and trust.*

*We have zero tolerance for, and will act appropriately in response to, any conduct or behaviour contrary to this Code of Conduct.*

*We encourage full disclosure of suspected breaches of the expected standards of conduct set out in this Code and will protect those who make such disclosures from reprisal.*

## 5. APPLICABLE REQUIREMENTS

### 1. OUR VALUES AND BEHAVIOURS

Our shared values express the deepest held beliefs of Plan Canada. They articulate our philosophy, desired culture and fundamental principles which should not be compromised for financial gain or short-term expediency. Please see Appendix 1 (*Plan Canada Code of Conduct Acknowledgement*)

### 2. STANDARDS OF CONDUCT

(i) **Personal Conduct Outside Work:** Plan Canada does not intend to dictate the belief and value systems by which our Associates conduct their personal lives. However, as our position throughout the world is dependent upon maintaining good relations and upholding our global reputation as a child-focused community development organization, we will not permit unlawful or unethical conduct by our Associates which may jeopardize our reputation, whether such conduct takes place during or after business hours. Such conduct includes, but is not limited to: any unlawful activity related to sexual abuse; child abuse; sexual harassment; assault and sexual exploitation.

(ii) **Concern for Children, Young People, their Families and Communities – Safeguarding and PSHEA:**

- ✓ Associates must not do anything that may cause emotional, physical or financial harm to the children and young people, and their families or communities that we serve. As an international child-centred community development organization committed to the well-being of children, Plan Canada does not tolerate child abuse in any form. Associates must be concerned about perception and appearance in their language, actions and relationships with children and young people.
- ✓ Associates must always adhere to Plan Canada's *Safeguarding Children and Young People Policy and Procedures* which states that:
  - Plan Canada is committed to the gender responsive safeguarding of children and young people from all forms of violence. We take very seriously our responsibility to ensure that we, as an organization, and anyone who represents us, do not in any way harm, abuse or commit any other act of violence against Children and Young People or place them at risk of the same.
  - We promote child and youth safe practices, approaches, interventions and environments which respect, recognize and respond to the specific safeguarding needs and addresses the protection risks of differing gender and other identities. We will challenge and do not tolerate inequality, discrimination or exclusion.
- ✓ Associates must also adhere to Plan Canada's *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* which supports our belief that every person has the right to live a life free from any form of sexual Violence.

- (iii) **Dealings with Children, Young People, their Families and Communities:** Associates must not use the property of or employ the efforts of children, their families or communities in which Plan Canada works for the benefit of the Associate, or the Associate's family and friends.
- (iv) **Laws and Regulations:** Associates must at all times comply with the laws and regulations of the jurisdiction in which they are based, including locations to which Associates travel in their capacity as Plan Canada Associates.
- (v) **Political Contributions:** Plan Canada does not make contributions, directly or indirectly, to any political candidate or party. Because it may be considered an in-kind political contribution, we do not give Employees time off with pay for political activity.
- (vi) **Gifts and Entertainment:** When dealing with government personnel, children, young people, their families and communities, donors, suppliers and other persons, Associates must be guided by two principles: (i) never to use their position to obtain personal gain; and (ii) never to be obligated to persons with whom Plan Canada does business. Associates also must conduct themselves at all times in a manner that avoids suspicion of such behaviour.
- Associates must not be involved in paying or accepting any bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment.
  - Associates must not give any gift, entertainment or benefit to any supplier, government personnel, public official or candidate for public office in circumstances where such an action could be viewed as attempting to secure the favour of such a person.
  - Reasonable business hospitality may be furnished by Associates whose duties require them to do so, provided that a proper accounting of the expenditures/benefit is made in writing to the Vice President, Finance in accordance with *Plan Canada's Expense Reimbursement Policy*. This Policy provides that gifts are non-reimbursable items (with isolated exceptions and requiring prior written approval by the Vice President, Finance or CEO).
  - Reasonable business entertainment and/or gifts may be accepted by Associates whose duties require them to do so, provided that a proper accounting of the benefit is made in writing to the Associate's supervisor and the Vice President, Finance who will maintain a registry of such disclosures. In determining what is reasonable, the entertainment and/or gifts should not be of such value as to constitute a personal enrichment for the recipient and should not be such as to appear excessive to an objective observer. Such determination is at Plan Canada's sole discretion.
- (vii) **Conflict of Interest:** Plan Canada respects each Associate's right to privacy in the conduct of their personal affairs. Associates should be free, however, of outside interests and activities which might impair the exercise of the Associate's independent judgment in carrying out their duties as an Associate to act solely in the best interest of Plan.

The following are among the arrangements prohibited by this *Code of Conduct*:

- a. an Employee or Board member may not be, directly or indirectly through a family member or other person acting on their behalf, an employee of, or serve as a proprietor, partner, officer or director of any supplier to Plan Canada if the Employee or Board member has any role in the selection of such supplier to Plan Canada;
- b. an Employee may not own capital stock or have other investments in any enterprise which is a supplier to Plan Canada, if such investment would be significant enough to interfere or conflict with the Employee's obligations and responsibilities to Plan Canada;
- c. an Employee may not be a consultant, employee or representative of another entity if the services provided to such entity would:
  - interfere with the Employee's obligation to Plan Canada because of the demands of time or interest;
  - utilize Plan Canada's proprietary information gained primarily through Plan Canada employment; or
  - identify Plan Canada with an activity or cause with which it, in its sole discretion, does not want to be identified.

**Disclosure:** Where an Employee or member of the Employee's family has an outside interest in or activities with any supplier of goods or services to Plan Canada, such interest or activities with such supplier must be disclosed by the Employee, at the earliest possible opportunity, in writing to the Employee's immediate People Leader, who will be responsible for informing the Vice President, Talent & Culture, Chief Operating Officer or the CEO. Board members should direct any such relationships to the Board Chair for determination.

(viii) **Contracting:** Associates must understand and comply with Plan Canada's *Procurement Policy* and all related Procedures in relation to all contracting

(ix) **Privacy and Confidentiality:** Associates who have access to Plan Canada's Confidential or Personal Information are in a position of trust. Associates must understand and comply with Plan Canada's *Privacy Policy*, its *Employee and Associate Privacy Policy*, its *Confidentiality Agreement*, and all related Privacy Policies and Procedures. As set out in these Policies and in the *Confidentiality Agreement*:

**Confidential Information** includes, without limitation, Plan Canada's business and financial records, statistical data, receivable/payable records, human resources and payroll data, Personal Information, and any other information that might be considered private, confidential, sensitive, privileged and/or proprietary in any form, howsoever gathered or stored, and whether or not specifically identified as "confidential", "proprietary" or "trade secret".

**Personal Information** means information relating to Plan Canada's donors, recipients, employees, or other individuals which is personally identifiable.

The general principles applying to the disclosure or use of Plan Canada information include:

- No disclosure of Personal Information that identifies sponsored families or children shall be made to unauthorized persons or the public without the informed consent of the family and, when appropriate, the child.
  - No disclosure of Personal Information that identifies youth participants in Plan Canada's domestic programs shall be made to unauthorized persons or the public without the informed consent of the young person and/or their parent or guardian as appropriate.
  - No disclosure or use of Confidential Information outside the immediate scope of employment or engagement should be made without prior written approval by Plan Canada (such approval to be granted by the Board Chair in the case of Board members) and, where necessary, the obtaining of a written agreement that confidentiality will be respected.
  - Communications with the media in countries outside of Canada must first be reviewed by the relevant National Organization or Country Director.
- (x) **Misuse of Plan Canada's Technology:** Plan Canada computer hardware, networks, databases, electronic and digital information, and software are Plan Canada's property and access to them is made available to Associates on trust. Associates must understand and comply with Plan Canada's Information Technology and Security policies and procedures.

## 6. **VIOLATIONS**

Violations of this *Code of Conduct* can have serious implications for Plan Canada's success. Nothing in the *Code of Conduct* abrogates Plan Canada's right to take whatever action it deems appropriate in the event of non-compliance.

- In the case of Employees, violations of this *Code of Conduct* may result in disciplinary action up to and including termination of employment, with or without notice, based on the severity of the infraction and the totality of the circumstances.
- Violations by other Associates, may result in the termination, with or without notice, of the Associate's relationship or engagement with Plan Canada.
- Plan Canada may restrict its business relationships with any third-party organization as a result to its non-compliance with this *Code of Conduct*.
- Civil legal action may be brought against Associates for violations of the *Code of Conduct* as Plan Canada, in its sole discretion, deems appropriate.
- Violations of the *Code of Conduct* which may violate local laws will be reported to authorities as required by law or as deemed appropriate by Plan Canada.

## 7. **IMPLEMENTATION**

- (i) This *Code of Conduct* will be included in the Employee Guide. All Employees will sign a *Code of Conduct Acknowledgement* in the form of Appendix 1, *Plan Canada's Safeguarding Children and Young People /PSHEA Code of Conduct (Annex A)* and a

*Confidentiality Agreement* prior to commencing their employment with Plan Canada. This signed *Code of Conduct Acknowledgement, Plan Canada's Safeguarding Children and Young People /PSHEA Code of Conduct (Annex A)* and a copy of the *Confidentiality Agreement* will be placed in the personnel file of each Employee. This process will occur on an annual basis and you are encouraged to review it regularly so you will always be aware of Plan Canada's requirements.

- (ii) Other Associates (Board members, volunteers, students, and interns) will be asked to sign the *Code of Conduct Acknowledgement, Plan Canada's Safeguarding Children and Young People Code of Conduct (Annex A)* and a *Confidentiality Agreement* when they begin their engagement with Plan, and thereafter on an annual basis.
- (iii) Contracts with other Associates (consultants, contractors and representatives of partner organizations engaged by Plan Canada) will include an abridged copy of this *Code of Conduct* including the *Whistleblowing Policy and Reporting procedures*.
  - a. Management will implement training for Associates on the *Code of Conduct* and related procedures.
  - b. Children, young people and communities with which Plan Canada engages, works with or is in contact with shall be made aware of the provisions of this *Code of Conduct* to ensure that they have the confidence and ability to report any suspected breaches of the required standards of conduct.

## 8. ACCOUNTABILITIES

- (i) The **Chair of the Board** is responsible for:
  - a. ensuring the implementation and monitoring of this *Code of Conduct* in the case of Board members;
  - b. promoting ethical conduct by all Board members;
  - c. through the services of the Board Secretariat, ensuring that a *Code of Conduct Acknowledgement (Appendix 1), Plan Canada's Safeguarding Children and Young People /PSHEA Code of Conduct (Annex A)* and *Confidentiality Agreement* is executed and retained prior to the commencement of a new Board member's engagement and on an annual basis thereafter; and
  - d. ensuring that all disclosures made pursuant to this *Code of Conduct* by Board members are documented and retained.
- (ii) The **Governance and Nominating Committee (GNC)** of the Board is responsible for:
  - a. reviewing and recommending this *Code of Conduct* and any revisions thereto to the Board for its approval; and
  - b. reviewing compliance to this *Code of Conduct*.
- (iii) The **Board** is responsible for:

- a. reviewing and approving this *Code of Conduct* and any revisions thereto, upon recommendation of the CEO and the GNC.
- (iv) The **Chief Executive Officer (CEO)** of Plan Canada is responsible for:
- a. approving this Code of Conduct and any revisions thereto; and recommending its approval to the Board through the GNC;
  - b. ensuring the implementation and monitoring of this *Code of Conduct* for Associates (other than Board members);
  - c. promoting ethical conduct by all Plan Canada Associates (other than Board members);
  - d. ensuring that all disclosures made pursuant to this *Code of Conduct* by Associates (other than Board members) are documented and retained; and
  - e. reporting to the Board, as may be required, on compliance with this *Code of Conduct*.
- (v) The **Chief Operating Officer (COO)** of Plan Canada is responsible for:
- a. overseeing the development and implementation of Procedures to ensure compliance with this *Code of Conduct*;
  - b. ensuring this *Code of Conduct* is communicated and accessible to all Plan Canada Associates (other than Board members); and
  - c. ensuring that all disclosures made pursuant to this *Code of Conduct* by Associates (other than Board members) are documented and retained.
- (vi) **Plan Canada’s Talent & Culture Department** is responsible for:
- a. ensuring that all Employees complete and submit a *Code of Conduct Acknowledgement (Appendix 1), Plan Canada’s Safeguarding Children and Young People/PSHEA Code of Conduct (Annex A) and Confidentiality Agreement* prior to commencement of their employment, and on an annual basis thereafter;
  - b. retaining the *Code of Conduct Acknowledgement, Plan Canada Safeguarding Children and Young People / PSHEA Code of Conduct (Annex A) and Confidentiality Agreement* in the Employee’s personnel file.
  - c. ensuring that all disclosures made to Talent & Culture pursuant to this *Code of Conduct* by Associates (other than Board members) are documented and retained.
- (vii) **Business Units** that retain or engage with individual Associates (other than Board members and Employees) are responsible for ensuring:
- a. that all such Associates within their areas of responsibility complete and submit a *Code of Conduct Acknowledgement (Appendix 1), Plan Canada’s Safeguarding Children and Young People/PSHEA Code of Conduct (Annex A) and Confidentiality Agreement* prior to commencement of their engagement, and on an annual basis thereafter;
  - b. retaining the *Code of Conduct Acknowledgement, Plan Canada Safeguarding Children and Young People/PSHEA Code of Conduct (Annex A) and Confidentiality Agreement* in the Associate’s file; and
  - c. ensuring that all disclosures made to the Business Unit pursuant to this *Code of Conduct* by such Associates are documented and retained.
- (viii) **People Leaders** are responsible for:
- a. promoting ethical conduct by all Plan Canada Associates (other than Board members);

- b. ensuring that all disclosures made to the People Leaders pursuant to this *Code of Conduct* by Associates (other than Board members) are documented and retained; and
  - c. reporting to Executive Management, as may be required, on compliance with this *Code of Conduct*.
- (ix) **Plan Canada's Legal Department** is responsible for revising this *Code of Conduct*, and related documentation including contracts with third parties for consistency with Plan International Global Policies, legislative requirements and best practice.

## **9. APPROVAL**

1. Approval of this *Code of Conduct*, and any associated revisions, other than non-material revisions to remedy inconsistencies or errors, is required by each of Plan Canada's Chief Executive Officer, its Governance & Nominating Committee and Board of Directors.
2. Approval of the Supporting Documents including Procedures, and any associated revisions, is required by Plan Canada's Safeguarding Focal Point, its Chief Executive Officer, and other members of the Executive Management Team depending on the focus of the revisions.
3. Notification of substantive changes or modifications to this Policy and Supporting Documents shall be communicated to all Employees, Associates and Visitors.

**APPENDIX 1**

**PLAN CANADA CODE OF CONDUCT ACKNOWLEDGEMENT**

1. I will conduct myself in line with the following Values and Behaviours as appropriate to my role:

VALUES	We strive for lasting impact	We are open and accountable	We work well together	We are inclusive and empowering
<b>DEFINITIONS</b>	We strive to achieve significant and lasting impact on the lives of children and young people, and to secure equality for girls. We challenge ourselves to be bold, courageous, responsive, focused and innovative.	We create a climate of trust inside and outside the organization by being open, honest and transparent. We hold ourselves and others to account for the decisions we make and for our impact on others, while doing what we say we will do.	We succeed by working effectively with others, inside and outside the organization, including our sponsors and donors. We actively support our colleagues, helping them to achieve their goals. We come together to create and implement solutions in our teams, across Plan International, with children, girls, young people, communities and our partners.	We respect all people, appreciate differences and challenge inequality in our programs and our workplace. We support children, girls and young people to increase their confidence and to change their own lives. We empower our staff to give their best and develop their potential.
<b>LEADERSHIP BEHAVIOURS</b>	<p>I articulate a clear purpose for staff and set high expectations for our work and its impact.</p> <p>I create a climate of continuous improvement, open to challenge and new ideas.</p> <p>I focus resources to drive change in practice and policy at local, national and global levels, to maximize our long-term impact, responding quickly to changing needs, new priorities or crises.</p> <p>I use evidence from inside and outside the organization to</p>	<p>I practice and promote a culture of openness and transparency within my team and beyond, including with our sponsors and donors.</p> <p>I hold myself and others accountable to achieve the highest standards of integrity, especially in our use of resources.</p> <p>I am accountable for ensuring we are a safe organization for all children, girls and young people.</p> <p>I am consistent and fair in the way I treat other people.</p> <p>I expect myself and others to be open</p>	<p>I seek constructive outcomes in discussions. I challenge assumptions but listen to others and I am willing to compromise when it is beneficial to progress.</p> <p>I build constructive relationships across Plan International to support our shared goals to develop trusting and ‘win-win’ relationships with funders, partners and communities, creating solutions together to meet our goals and to support others in achieving theirs.</p> <p>I engage and work with others outside the organization to build a better world for girls and all children.</p>	<p>I actively promote diversity, gender equality and inclusion, inside and outside of Plan International.</p> <p>I listen with humility to others and support those I work with to participate in decisions, to take more responsibility and to develop their potential.</p> <p>I encourage a climate that empowers children and young people as agents of change in their own lives.</p> <p>I will not tolerate any form of bullying, harassment or discrimination in the workplace.</p>

	understand the root causes of issues, inform decisions and evaluate effectiveness	about mistakes and to learn from them.		
<b>STAFF BEHAVIOURS</b>	<p>I have the courage to challenge the way we and others work, to make sure we all achieve the best results.</p> <p>I take the initiative to find new and better ways of doing my work.</p> <p>I focus my effort where it will make the best contribution to Plan International's purpose and strategic goals.</p> <p>I am flexible and change my ways of working when needed.</p> <p>I seek and use information on the efficiency and effectiveness of my work to improve my contribution.</p> <p>I persevere and encourage others to maintain a positive outlook in the face of setbacks and adversity</p>	<p>I hold myself and others (inside and outside the organization) to account for what we have agreed to do and the impact of our actions on others.</p> <p>I am open, honest and transparent about my work.</p> <p>I am not afraid to admit mistakes; I try to put them right and do better next time.</p> <p>I willingly share information to support effective decision making in my team and beyond.</p> <p>I stand up and challenge others when I see wrong doing.</p> <p>I am honest in how I use resources and do not waste them.</p>	<p>I offer information, experience and support to colleagues across Plan International and others to help us meet our shared goals.</p> <p>I abide by agreed codes of conduct in my work with my team and others.</p> <p>I develop improvements and solutions by working collaboratively with colleagues and others.</p> <p>I help colleagues in my team and others to tackle challenges and celebrate successes.</p> <p>I ask for help when I need it, seeking and listening to feedback from others in order to learn and improve.</p> <p>I value contributions from colleagues across Plan International.</p>	<p>I help to create an environment where children, young people, communities, partners and colleagues are supported and feel safe.</p> <p>I respect and pay attention to each person's rights and needs.</p> <p>I listen to others with humility and value their opinions, beliefs and perspectives, challenging my own point of view.</p> <p>I confront and challenge both direct and indirect forms of discrimination, gender inequality, bullying and harassment.</p> <p>I encourage those I work with to influence decisions and develop themselves.</p> <p>Where appropriate I involve children and young people in the decisions that affect them.</p>

## 2. I will respect others:

### I will:

- a. Respect the rights of all people without discrimination.
- b. Always act fairly and honestly and treat people with dignity and respect.
- c. Be aware of what constitutes harassment, bullying and discrimination and the damage it can do to individuals and to Plan Canada, and comply with all applicable policies and standards including Plan Canada's *Workplace Discrimination, Harassment, Violence and Bullying Prevention Policy and Program*.

**I will not:**

- a. Take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal), intimidation or exploitation, or in any other way infringe the rights of others.

**3. I will work actively to safeguard the rights of children and young people:**

**I will:**

- a. Adhere to the Plan Canada's *Safeguarding Children and Young People Policy and Procedures*, Plan Canada's *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy and Plan Canada's Safeguarding Children and Young People / PSHEA Code of Conduct* attached hereto as Annex A.

**4. I will maintain high standards of personal and professional conduct while working for Plan Canada:**

**I will:**

- a. Ensure that my behaviour does not jeopardize our political and religious neutrality.
- b. Be open and honest in dealings with Plan Canada, the children, young people and communities, and its partners, donors and other associates we work with.
- c. Adhere to any professional code of conduct that applies to my role and profession.
- d. Make proper use of Plan Canada's resources and take all reasonable steps to protect them from theft, fraud or other damage.
- e. Seek to ensure that my conduct does not bring Plan Canada into disrepute.

**I will not:**

- a. Pursue personal or family gain or advantage in my dealings with or on behalf of Plan Canada.
- b. Accept any bribe, kickback or other unlawful payment or benefit to secure any concession, contract or other favourable treatment.
- c. Enter into any business relationship on behalf of Plan Canada without authorization from my People Leader and not in compliance with Plan Canada's *Procurement Policy* or *Code of Conduct*.
- d. Behave in a way which creates unnecessary risk to my security or the security of others.
- e. Use any substances (alcohol, drugs or otherwise) in a way that adversely affects my ability to do my job or affects Plan Canada's reputation.
- f. Possess or profit from the sale of illegal goods or substances.
- g. Use Plan Canada's computer equipment, mobile phones, video and digital cameras or other equipment to view, download, create or distribute inappropriate material, including but not limited to material which is pornographic, defamatory, abusive, sexist, racist or otherwise exploitative.
- h. Exchange money, employment, goods or services for sex, including sexual favours or any other forms of humiliating, degrading, or exploitative behaviour.
- i. Disclose any Plan Canada Confidential Information unless it is a requirement of my job or I am legally required to do so.

**5. I will report any concern or incident relating to this *Code of Conduct* where I develop concerns or suspicions regarding breaches of this *Code*.**

**I will:**

- a. Report any matter which appears to breach the standards contained in the *Code of Conduct* or associated Policies that I witness or I am made aware of to the appropriate management or other party.

- b. Associates may also report suspected breaches of this *Code of Conduct* by using the *Whistleblowing Policy and Reporting Procedures* attached as Appendix 2.
- c. Support any investigation into suspected, alleged or known breaches of this *Code* or Plan Canada's associated Policies, including as a witness.

**I will not:**

- a. Withhold any relevant information.
- b. Undertake any action on my own that is not in line with local policies and procedures and/or, without guidance from relevant focal points and People Leaders.

## **6. Implementation and Monitoring**

Failure to adhere to this *Code of Conduct* and the standards of behaviour it promotes and requires could result in disciplinary action (including, potentially, your dismissal or termination of all relations with Plan Canada including contractual and partnership agreements). In some cases, the matter may be so serious that Plan Canada may choose, or be obliged, to report to any relevant professional, government or law enforcement authorities which may decide to launch a criminal prosecution.

Plan Canada will:

- Take all concerns and reports seriously at all levels.
- Investigate and act on reports immediately.
- Take appropriate legal or other action against anyone making a false and/or malicious accusation.

**ANNEX A:**  
**PLAN CANADA’S SAFEGUARDING CHILDREN AND YOUNG PEOPLE /**  
**PREVENTING SEXUAL HARASSMENT, EXPLOITATION AND ABUSE (PSHEA)**  
**CODE OF CONDUCT**

Plan Canada is committed to creating a safe environment for Children and Young People. All Associates have a duty to uphold the principles of Plan Canada’s *Safeguarding Children and Young People Policy and Procedures (Safeguarding Policy)* and its *Preventing Sexual Harassment, Exploitation and Abuse Policy (PSHEA Policy)* and commit to maintaining an environment that prevents violence against Children and Young People and to protect vulnerable people from sexual harassment, exploitation and abuse.<sup>1</sup>

This *Code of Conduct* forms part of Plan Canada’s *Safeguarding Policy* and shall be enforced pursuant to Section 9 of the *Safeguarding Policy* which provides that:

“Violations of this Policy can have serious implications for Plan Canada’s success. Nothing in this Policy abrogates Plan Canada’s right to take whatever action it deems appropriate in the event of non-compliance.

- In the case of Employees, violations of this Policy may result in disciplinary action up to and including termination of employment, with or without notice, based on the severity of the infraction and the totality of the circumstances.
- Violations by Associates (other than Employees) may result in the termination, with or without notice, of the Associate’s relationship or engagement with Plan Canada.
- Civil legal action may be brought against Associates and Visitors for violations of this Policy as Plan Canada, in its sole discretion, deems appropriate.
- Violations of this Policy which may violate local laws will be reported to authorities as required by law, or as otherwise deemed appropriate by Plan Canada.”

Violations of Plan Canada’s *PSHEA Policy* are also managed in accordance with Section 9 of the *Safeguarding Policy*.

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<sup>1</sup> Pursuant to Section 7, paragraph 12(d), of Plan Canada’s *Safeguarding Policy*, all Associates and Visitors shall:

(d). be aware of and comply with this *Policy*, including the *Safeguarding Code of Conduct (Annex 1)*.

Pursuant to Section 7, paragraph 13, of Plan Canada’s *Safeguarding Policy*:

13. Associates and Visitors shall agree, by signing, to complying with either:

- i. the *Safeguarding Code of Conduct (Appendix 1)*; or
- ii. other appropriate guidance developed by the relevant Safeguarding Lead on appropriate behaviour towards Children and Young People as relevant to their engagement using the *Safeguarding Code of Conduct* as a guide; or
- iii. their own Code of Conduct, provided the contracting Manager ensures that it complies and is consistent with this Policy.

**As such, I agree that I will:**

- a. Adhere to Plan Canada's *Safeguarding Policy* and be open and honest in my dealings with Children and Young People, their families, and communities participating in programmes, projects, processes, events, and activities.
- b. Treat Children and Young People in a manner which is respectful of their rights, integrity, and dignity and considers their best interests regardless of age, sex, gender, gender identity, sexual orientation, nationality, ethnic origin, colour, race, language, religious or political beliefs, marital status, disability, physical or mental health, family, socio-economic or cultural background, class, or any history of conflict with the law.
- c. Comply with all relevant international standards and local legislation in relation to Child labour, and refrain from using Children and Young People aged below 18 years for domestic or other labour, if such work is inappropriate, exploitative or harmful given their age or developmental capacity, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury, exploitation, or violence. In addition, I understand that I must not use Children and Young People of any age that we work with for domestic or other labour.
- d. Contribute to building an environment where Children and Young People we engage with are: (i) respected and empowered to participate in and discuss decision making and interventions into their safeguarding in accordance with their age, maturity and evolving capacities; and (ii) well informed on their safeguarding and protection rights and what to do if they have a concern.
- e. Create and maintain an environment which prevents the abuse and exploitation of Children and Young People ensuring that I am aware of potential risks with regards to my conduct and work and take appropriate action so as to minimize risks to Children and Young People.
- f. Respect the privacy and confidentiality of Children and Young People associated with Plan Canada.

**This means I will:**

- Never ask for or accept personal contact details or invitations to share personal contact details (this includes email, phone numbers, social media contacts, address, webcam, skype, etc.) from any Child or family associated or formerly associated with our work or share my own personal contact details with such individuals except where this has been explicitly authorised by Plan Canada and/or for Plan Canada business purposes.
- Never disclose, or support the disclosure of, information that identifies sponsored families or Children, through any medium, unless that disclosure is in accordance with *Plan Canada Privacy Policies and Procedures* and/or has the explicit consent of Plan Canada. Media include paper, photographs, and social media.
- Never make any contact with a Child, Young Person, or family members associated with Plan Canada's work that is not supervised by a (or another) Plan Canada Employee. Such contact may include but is not limited to visits and any form of communication via social media, emails, and letters.
- Always ensure that when on an official or work visit with Plan Canada, and I wish to take pictures of Children and Young People associated with the organization, for personal use, I will:
  - Always consult first with the local Plan International office so as to make sure that it is okay to take pictures in the local context and that the intended use of the pictures does not conflict with Plan Canada's policies.
  - Ask permission of the Child or Young Person (or in the case of young Children, their parent or guardian) informing them of the specific purpose(s) and intended use (including how and

- where) and respect their decision to say no making it clear that there will be absolutely no negative repercussions from denying such consent.
- Ensure the images are respectful and do not impact negatively on their dignity and privacy.
  - Ensure that the use of the images does not put the Child or Young Person at risk of being identified or located.
  - Never upload the images of Children and Young People associated with Plan International to non-Plan International social media pages without the explicit consent of Plan Canada.
- g. Report and respond to any concerns, suspicions, incidents or allegations of actual or potential abuse to a Child or Young Person in accordance with applicable procedures of the engaging office.
  - h. Cooperate fully and confidentially in any Plan Canada investigation of concerns or allegations of abuse to Children and Young People.
  - i. Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during association with Plan Canada that relate to exploitation and abuse of a Child or Young Person.

**I will not:**

- a. Abuse or exploit a Child or Young Person or behave in any way that places a Child or Young Person at risk of harm, including through harmful traditional practices such as, for example, Female Genital Mutilation, forced or Child marriage.
- b. Engage in any form of sexual activity or develop physical/sexual relationships with any person under the age of 18 regardless of the age of consent locally. Mistaken belief in the age of a Child is not a defence.
- c. Engage in sexual relationships with Plan Canada youth direct beneficiaries aged 18 to 24 years as these undermine the credibility and integrity of Plan Canada's work and are based on inherently unequal power dynamics.
- d. Use physical punishment/discipline or use of physical force of any kind towards Children and Young People.
- e. Engage Young People in any form of sexual activity which involves the exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- f. Use language or behave towards a Child or Young Person in a way that is inappropriate, offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- g. Fondle, hold, kiss, hug or touch Children or Young People in an inappropriate or culturally insensitive way.
- h. Have a Child /Children/Young Person with whom I am in contact in a work-related context, stay overnight at my home or any other personal residential location or accommodation.
- i. Sleep in the same room or bed as a Child or Young Person with whom I am in contact in a work-related context. Where it is necessary to sleep close to unaccompanied Children and Young People, I will make sure that another adult is present, and it is in line with authorized procedures.
- j. Do things of a personal nature for Children or Young Person, with whom I am in contact in a work-related context, (e.g. taking a Child /Young Person to the toilet/bathroom; helping them get un/dressed etc.) that they can do for themselves.

- k. Spend time alone away from others with Children and Young People with whom I am in contact in a work-related context; I will always make sure that another adult is with me and/or I am with the Child /Young Person in an open public place, where others are around and in plain view of others.
- l. Hit or otherwise physically assault or physically abuse Children or Young People.
- m. Act in ways that shame, humiliate, belittle or degrade Children and Young People, or otherwise perpetrate any form of emotional abuse.
- n. Discriminate against, show differential or preferential to, or favour particular Children and Young People to the detriment of them or others.
- o. Develop relationships with, engage in any practice with or develop behaviour towards Children and Young People which could in any way be deemed or interpreted as exploitive or abusive.
- p. Condone or participate in behaviour of Children or Young People which is illegal, unsafe, or abusive.
- q. Use any computers, mobile phones, video and digital cameras, or any such medium to exploit, harass or bully Children or Young People.
- r. Use computers, mobile phones, or video/digital cameras or other electronic devices, to access, view, create, download, or distribute pornography, especially abusive images of Children or Young People.

**The above is not an exhaustive list. Employees and Associates should consider all related actions and behaviour which may compromise the rights and safeguarding of Children and Young People.**

**PSHEA:** In addition to my commitments above, I acknowledge that I have a responsibility to prevent Sexual Harassment, Exploitation and Abuse and that I will adhere to the provisions of Plan Canada's PSHEA Policy including its reporting obligations.

### **Personal Conduct Outside of Work or Engagement with Plan Canada**

Plan Canada does not dictate the belief and value systems by which Employees and Associates conduct their personal lives. However, as our position throughout the world is dependent upon maintaining good relations and upholding our global reputation as a child-focused community development organization, we will not permit unlawful or unethical conduct by our Employees/Associates which may jeopardize our reputation, whether such conduct takes place during or after business hours. Such conduct includes, but is not limited to, any unlawful activity related to sexual abuse, child abuse, sexual harassment, assault, and sexual exploitation.

## APPENDIX 2

### PLAN CANADA’S WHISTLEBLOWING POLICY AND REPORTING PROCEDURES

#### DEFINITIONS

In this Policy, “**Whistleblowing**” means the disclosure of information which relates to potential or suspected unethical and/or illegal conduct or activity, irregularities, wrongdoing or dangers at work (each of these a potential or suspected “**Wrongdoing**”). This may include:

- a. Breaches of Plan Canada’s internal policies and procedures, including (but not limited to):
  - i. our *Code of Conduct*;
  - ii. our *Safeguarding Children and Young People Policy and Procedures*;
  - iii. our *Preventing Sexual Harassment, Exploitation and Abuse Policy (PSHEA) Policy*
  - iv. our *Procurement Policy* and related Procedures;
  - v. our *Workplace Discrimination, Harassment, Violence and Bullying Prevention Policy and Program*;
  - vi. our *Expense Reimbursement Policy*; and
  - vii. our Information Technology and Security policies;
- b. Criminal offences or breach of civil law or regulations;
- c. Endangerment of the health or safety of any person;
- d. Conduct likely to damage the reputation or financial well-being of any Plan Canada;
- e. The deliberate concealment of any of the above.

A “**Whistleblower**” means a person who raises a genuine concern relating to any potential or suspected Wrongdoing that they reasonably believe to be true.

#### PURPOSE

This *Whistleblowing Policy and Reporting Procedures* has been established to permit Associates to raise legitimate concerns about any potential or suspected Wrongdoing, without fear of reprisal.

This *Whistleblowing Policy and Reporting Procedures* covers the steps to take when you feel you have identified or observed any potential or suspected Wrongdoing.

Associates are usually the first to be aware of any malpractice, fraud, negligence, or illegality, and must be able to raise legitimate issues in an open and honest way without fear of reprisal.

#### REPORTING PROCEDURES

1. Suspected breaches of Plan Canada’s *Safeguarding Children and Young People Policy and Procedures* and/or Plan Canada’s *Preventing Sexual Harassment, Exploitation and Abuse (PSHEA) Policy* should be reported in accordance with Procedure #2 – Reporting a Safeguarding /PSHEA Concern to that Policy. If you have questions regarding Procedure #2, please contact Plan Canada’s Safeguarding Focal Point or the Safeguarding Lead for your Department.
2. Suspected violations of Plan Canada’s *Workplace Discrimination, Harassment, Violence and Bullying Prevention Policy and Program* should be reported in accordance with the reporting procedures set out in that Policy.
3. Other than as noted in #1 and #2 above, all Associates (other than Board members) who believe, in good faith that they have uncovered or observed evidence that indicates a potential or suspected

Wrongdoing, are expected to report it, with the supporting factual evidence to their People Leader or People Liaison, or directly to a member of the Executive Management Team.

4. Other than as noted in #1 and #2 above, Board members who believe, in good faith that they have uncovered or observed evidence that indicates a potential or suspected Wrongdoing, are expected to report it, with the supporting factual evidence to the Chair of the Board.
5. As a supplement to these regular channels, you may report through Safecall, an independent reporting service, which provides a professional, independent and confidential means of reporting your concerns. If you feel unable to report directly to Plan Canada Management, you can contact Safecall at any time by phone, email or internet in your own preferred language. Safecall will pass on your concerns to Global Assurance in International Headquarters who will ensure that they are reviewed and, if appropriate, investigated more fully. Global Assurance reports directly to the International Board and therefore has a degree of independence from Plan Canada's Management. Safecall is independent of Plan Canada and therefore an organization with whom you may raise your concerns and be assured that you will be taken seriously. While we do not encourage anonymous reporting because it makes it harder to investigate allegations, Safecall will guarantee your anonymity if you wish it. All calls are treated with utmost confidentiality by Safecall staff.

**ACTION TO BE TAKEN:** All concerns raised under this *Whistleblowing Policy and Reporting Procedures* will be dealt with promptly and will be treated seriously and sensitively.

Your concerns will be discussed with you in order to help determine the precise action to be taken. It will be for the individual with whom you have raised the concern to decide whether or not to involve other parties to investigate.

Whenever possible, resolution will be reached and the outcome known within 30 days of raising the concern. You will be informed of the action taken and the outcome.

**NO REPRISAL:** If you have raised a concern in good faith and an investigation finds the concern to be unfounded, no action will be taken against you for 'whistle blowing'.

Records of Whistleblowing concerns and investigations will be maintained on a strictly confidential basis in accordance with Plan Canada's retention policies and procedures.

Upon request, Plan Canada shall provide a summary report of all reported Whistleblowing concerns and investigations to the Global Hub Director of Global Assurance.

**PENALTIES:** Anyone who victimizes an Associate for raising a legitimate concern or tries to deter someone from raising a legitimate concern will be subject to disciplinary action.

Anyone who makes false and malicious accusations or who raises concerns for personal gain will also be the subject of disciplinary action.

**CONTACT:** The contact information of Safecall is:

Telephone: 1-877-599-8073

Report online at: [www.safecall.co.uk/report](http://www.safecall.co.uk/report)

E-mail: [plan@safecall.co.uk](mailto:plan@safecall.co.uk)