# 3.7 Code of Conduct: How Staff Members Apply our Organizational Values

## Introduction

FRIDA is guided by our mission, vision and values. We seek to develop an organisational culture that reflects our transformative vision for every woman, girl, trans person and intersex person to have the power and resources to participate fully and equally in creating a peaceful, just and sustainable world.

In daily life and in our relationships and contacts with donors, partners, grantee-partners, other stakeholders, FRIDA employees aim to give practical application to our values and to act with the highest possible integrity. We embrace diversity, demonstrate openness and innovation, show preparedness to share risks and to collaborate towards shared goals. We practice continuous improvement of our work, informed by evaluation and learning. We communicate the outcomes of our work and demonstrate accountability, to each other and all those with whom we work. And lastly, we work with determination and commitment to create real change.

## **Purpose**

This Code of Conduct outlines the expectations of employees of FRIDA in fulfilling their responsibilities and giving life to our values. FRIDA staff are expected to comply with this Code of Conduct, as well as with all applicable laws and regulations.

In case of misconduct within FRIDA under the terms of these policies, employees are encouraged to report this as explained in the procedures.

## Coverage

The Code of Conduct applies to all FRIDA employees and those contracted as consultants.

## **Definitions**

**Canadian law –** the colloquial term for the various laws that together form Canadian working conditions legislation.

**Aggression and violence** – are defined under Canadian Law as the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker; an attempt to exercise physical force against a worker, in a workplace, that could cause

physical injury to the worker, and a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

**Bullying** – under Canadian Law, while bullying is a form of aggression, the actions can be both obvious and subtle. It is important to note that the following is not a checklist, nor does it mention all forms of bullying. This list is included as a way of showing some of the ways bullying may happen in a workplace. Also remember that bullying is usually considered to be a pattern of behaviour where one or more incidents will help show that bullying is taking place.

#### Examples include:

- Spreading malicious rumours, gossip, or innuendo.
- Excluding or isolating someone socially.
- Intimidating a person.
- Undermining or deliberately impeding a person's work.
- Physically abusing or threatening abuse.
- Removing areas of responsibilities without cause.
- Constantly changing work guidelines.
- Establishing impossible deadlines that will set up the individual to fail.
- Withholding necessary information or purposefully giving the wrong information.
- Making jokes that are 'obviously offensive' through written, spoken and/or online communications.
- Intruding on a person's privacy by pestering, spying or stalking.
- Assigning unreasonable duties or workload which are unfavourable to one person (in a way that creates unnecessary pressure).
- Underwork creating a feeling of uselessness.
- Yelling or using profanity.
- Criticising a person persistently or constantly.
- Belittling a person's opinions.
- Unwarranted punishment.
- Blocking applications for training, leave or promotion.
- Tampering with a person's personal belongings or work equipment.

If you are unsure whether or not an action or statement constitutes bullying, staff may reach out to the HR Officer or their supervisor, whoever they feel more comfortable with. Anything discussed will remain confidential and no act of reprisal will be taken.

#### Bullying does not include:

- Reasonable management action conducted in a reasonable manner, which includes for example (without limitation): setting reasonable performance goals, implementing organisational changes or justified restructuring, and taking disciplinary action including suspension or termination of employment/engagement following due processes;
- Differences of opinion and general disagreements in the workplace which may come up

**Confidential information –** any information that is understood to be private and not to be disclosed either at all or without mutual agreement. Confidential information may be marked as such or deemed confidential by its nature, e.g. it is information that is not available in the public domain.

Examples include, but are not limited to:

- Applications for funding;
- Job applications (including paid and unpaid roles);
- Information on donors and donations (unless authorised);
- Personal information (see below).

Confidential information should be accessible only to those authorised to have access, and is protected throughout its lifecycle. All employees and representatives with access to confidential information are responsible for maintaining the integrity, confidentiality, and privacy of such information to protect any individual, group or organisation concerned. Confidential information regarding donors or donations must not be disclosed to unauthorised parties without the explicit consent of the donor.

**Consent** - defined as the voluntary agreement to engage in sexual activity. With regards to adult sexual assault, lack of consent is crucial in determining whether a sexual assault has occurred. The law also states that people have the right to change their minds at any point in a sexual encounter and to withdraw consent by words or conduct. Here it's important to know that consent cannot be provided under the following conditions:

- Where the survivor indicates "no";
- Where the survivor was incapable of consenting;
- Where someone other than the survivor gave consent for them;
- Where the survivor changed their mind;
- Where there was an abuse of trust or authority.
- The following defences cannot be used by a perpetrator:
  - Where someone was too intoxicated to realize they had not consented;
  - Where someone believed that they were consenting. No assumptions.

**Discrimination** – is unfair or unequal treatment which makes distinctions between individuals or groups so as to disadvantage some and advantage others, on the basis of one or more protected attributes (see below). Treatment could also be based on imputed characteristics (i.e., stereotypes), being a characteristic that is generally imputed to someone on the basis of their attribute. *The Canadian Human Rights Act* prohibits discrimination on any ground whatsoever, and explicitly on the basis of:

- race;
- nationality or ethnic origin;
- Colour;
- religion;
- age;

- sex:
- sexual identity and expression;
- gender identity or expression;
- marital status:
- family status;
- disability;
- genetic characteristics;
- conviction for an offence for which a pardon has been granted, or in respect of which a record suspension has been ordered.

#### In addition to this list, FRIDA adds:

- caste:
- class;
- migration status;
- relationship status;
- any conviction, criminal record or outstanding warrants.

Age Distinction: FRIDA | The Young Feminist Fund works closely and in the interest of young feminists under the age of 35, FRIDA promotes and encourages the involvement of young feminists under 35 years of age. FRIDA acknowledges that preference may be given to persons under 35 to best support our mandate.

Race/colour discrimination can involve treating someone unfavourably because the person presents as, or is married to (or associated with) a person of a certain race or color. An employment policy or practice that applies to everyone regardless of race or color, can be discriminatory if it has a negative impact on the employment of people of a particular race or color and is not job-related or necessary to the operation of business.

#### FRIDA further explains race and colour discrimination as follows:

- Race discrimination involves treating someone unfavourably because they are of a certain race, have certain characteristics associated with race (such as hair texture, skin color, or certain facial features), or because of national origin.
- Color discrimination involves treating someone unfavourably because of skin color or complexion.

#### Discrimination can be Direct or Indirect.

- Direct Discrimination Occurs when a person is treated unfavourably because of a
  particular attribute or circumstance protected by the law, as compared to a person
  without the particular attribute or circumstance.
- Indirect Discrimination Occurs when a requirement, condition, policy or practice is
  imposed that appears to treat all workers equally, however unfairly disadvantages
  someone because of a personal attribute or circumstance, and is reasonable. That is,
  when a neutral behaviour (e.g. a policy or practice) results in discrimination based on
  one of the grounds mentioned above.

**Gifts and Benefits** - gifts and benefits include products, vouchers, discounts, etc., but exclude items that are generally regarded as souvenirs (e.g., pens, cups, keychains, USB sticks, books, stationery and other small, inexpensive office supplies). In this policy the term can also include corporate hospitality, such as meals, entertainment, travel and accommodation.

Harassment – is defined under Canadian law as engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome. The comments or conduct typically happen more than once; however, harassment may be one incident or a series of incidents that are known or should be known to be offensive, embarrassing, humiliating, or demeaning to a worker or a group of workers. It may also include behaviour that intimidates, isolates, or even discriminates against the targeted individuals. Harassment may also relate to a form of discrimination as set out in the Ontario Human Rights Code which protects all employees from harassment on the basis of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed (religion/faith), sex (including pregnancy), gender, sexual identity and expression, disability, age, marital status, family status, and record of offences for which a pardon has been granted. Employers are also under an obligation to ensure, so far as is reasonably practicable, the health and safety of employees, including an environment free of harassment.

Examples of Workplace Harassment include, but are not limited to the following:

- Making remarks, jokes, and innuendos that demean, ridicule, intimidate, or offend;
- Displaying or circulating offensive pictures or materials in print or electronic form;
- Bullying;
- Gaslighting
- Repeated offensive or intimidating phone calls and/or texts, emails or messages on social media:
- Inappropriate and/or unwanted sexual touching, advances, suggestions or requests;
- Displaying of materials or graffiti, which are sexually explicit or anything derogatory pertaining to race, ethnicity, religion, or physical appearance;
- Patronizing behaviour, language, or terminology, that reinforces stereotypes and undermines self-respect or adversely affects work performance or working conditions;

Racial harassment can include racial slurs, offensive or derogatory remarks about a person's race or colour, or the display of racially-offensive symbols. Simple teasing, offhand comments, or isolated events can also be reported as forms of harassment.

**Safeguarding -** Working collaboratively with children, with a focus on teenage girls (cis girls, trans, intersex and gender non-conforming girls) to prevent harm and protect them from abuse, based on consent, respect and shared responsibility. This includes:

- 1. Involving children and young people in exploring and understanding the assessment and control of risks.
- Enabling children and young people to play an increasing role in their own protection.

- 3. Using restorative and healing justice to seek reconciliation and as an opportunity for restoration and transformation from harm.
- 4. Ensuring that children and young people who are at the centre of a safeguarding concern are also at the centre of decision-making.

FRIDA | The Young Feminist Fund will treat any breach of its safeguarding procedures seriously. FRIDA is committed to restorative and healing justice approaches as avenues for repair and transformation in the face of harm, and will consider restorative justice processes as a primary mode of responding to a breach of this policy. FRIDA will take action to protect the teenage girls and children with whom it works. Due to this, depending on the nature of the breach, failure to comply with this policy may also/instead lead to possible dismissal, termination of contracts or partnerships and, where appropriate, referral to relevant authorities. For detailed information on FRIDA's approach to safeguarding, staff can refer to the Safeguarding Policy, found here.

**Sexual Harassment** – under Canadian law is any conduct, comment, gesture or contact of a sexual nature, knowing that such attention is unwanted; implied or expressed promise of reward for complying with a sexually oriented request; implied or expressed threat of reprisal or actual reprisal for refusal to comply with a sexually oriented request; a sexual relationship which constitutes an abuse of power; and/or sexually oriented remarks or behaviour which may reasonably be perceived to create a negative psychological and emotional environment.

Examples include (but are not limited to):

- unwelcome physical touching;
- staring or leering;
- suggestive comments or jokes;
- repeated requests to go out on dates;
- implied requests/requests for sex;
- intrusive questions about one's private life or body

**Sexual Assault** – An assault of a sexual nature. The Supreme Court of Canada held that the act of sexual assault does not depend solely on contact with any specific part of the human anatomy, but rather is an act of a sexual nature that violates the sexual integrity of the victim.

**Victimisation/Reprisal** - Treating someone less favourably because they have made a complaint about Discrimination, Bullying or Harassment, they have taken action against FRIDA under the relevant discrimination or bullying legislation, or have refused to do something because it would be Discrimination, Harassment or Victimisation.

**Vilification** - The making of statements verbally, electronically or pictorially which could incite hatred of others, be insulting, humiliating, offending or intimidating another person or group based on their protected attributes, e.g., their ethnicity, gender identity, sexual identity and expression or religious belief or activity.

## **FRIDA's Commitments**

#### FRIDA's Board, advisors and staff members are expected to:

- Respect the rights of all human beings regardless of citizenship, race, place of origin, ethnic origin, colour, ancestry, physical or mental disability, age, creed, sex/pregnancy, gender identity, gender expression, family or marital status, sexual identity and expression, receipt of public assistance or source of income, record of offences, gender-determined characteristics, political beliefs, or any other protected grounds;
- Act fairly, honestly and tactfully and treat people with dignity and respect; and
- Be aware of the national law of the country (or countries) in which different staff members operate;
- Respect local cultures, traditions, customs and practices that are in line with FRIDA values:
- Strive towards centering a culture of community care and wellbeing, intersectionality, anti-oppression and anti-colonialism, participatory processes, and recognizing diverse types of feminism.
- Abide by FRIDA's Conflict of Interest policy.

#### FRIDA's Board, advisors and staff members are expressly prohibited from:

- Undertaking actions that undermine their ability to do their job or that are likely to bring the reputation of the organization into disrepute;
- Undertaking actions that create unnecessary risk to their security or the security of others (such as refusing to wear a seatbelt where it is mandatory), while representing FRIDA;
- Acting against FRIDA's Conflict of Interest;

#### FRIDA's Board, managers, employees and representatives commit to the following:

- I. We will uphold FRIDA's values in all our actions, at all times, by:
  - Embracing diversity in our organisation and among our partners by being inclusive.
  - Being open to bold, innovative strategies; responsive to changing circumstances; ready to take advantage of strategic opportunities; and prepared to share the risks inherent in the work of resisting and transforming oppressive structures and systems.
  - Demonstrating dedication to forging collaborative partnerships with donors, grantee-partners, and women's, girls', and trans and intersex people's human rights organisations in order to achieve shared goals.
  - FRIDA encourages staff to be mindful and respectful of the diverse range of cultures and backgrounds that FRIDA's team members and stakeholders represent during work trips.
  - Being accountable, evaluating and communicating the outcomes of our grantmaking, and open to sharing what we have learned about doing successful social justice philanthropy.

 Acting with determination to make real, lasting improvements in women's, girls', and trans and intersex people's lives and to inspire others to join us in this work and contribute to it financially.

#### II. We will be accountable to each other, and our stakeholders, by:

- Treating others, both within and beyond our workplace, equally, inclusively, fairly and with respect, dignity, courtesy, consideration and compassion.
- Respecting and valuing personal and professional diversity, maintaining a safe space and an environment that promotes inclusivity, non-violent communication, active individual and collective accountability and restorative justice.
- Being inclusive, sharing appropriate information and communicating openly and honestly with each other.
- Drawing attention to ways in which each other's behaviour is, or could be perceived to be, contrary to agreed appropriate conduct.
- Abiding by FRIDA's Code of Conduct at all times, knowing that if we commit a breach we
  may be required to undergo training and/or counselling and/or disciplinary procedures
  which may include warnings and/or dismissal in serious and repeated cases.
- Committing to resolve any breaches, seeking to resolve issues through constructive dialogue and direct feedback where possible. If not possible, staff members can refer to the process outlined in the Incident Response & Restoration Policy.
- Treating all incidents of harassment seriously and acting on all complaints and ensuring that they are resolved quickly, confidentially and fairly.

#### III. We will be transparent in all our actions, by:

- Maintaining the independence of FRIDA from governments, donors and other groups in determining our strategic priorities, policies and recommendations.
- Declaring any potential or apparent conflicts between our personal interests and our duty to act in the best interests of FRIDA to either our supervisor or the Executive Director, and following their directions as to the most appropriate course of action.
- Abiding by the FRIDA Conflict of Interest policy and procedure and Whistleblower policy.
   These policies will be published on FRIDA's website.

#### IV. We accept responsibility, by:

- Carrying out our roles and responsibilities to the best of our abilities and being accountable for our own performance.
- Informing ourselves of and abiding by relevant International and and local laws and applicable regulations and accepting that ignorance does not excuse us from this duty.
- Informing ourselves of and complying with FRIDA's policies, procedures and guidelines, as varied from time to time, and undergoing any associated training that is required of us.
- Protecting personal information and data by following FRIDA guidelines on digital security and communications.

- Behaving in a respectful manner at work or whenever we are representing FRIDA, being mindful of our roles as FRIDA representatives, including at external meetings, on work trips, at conferences and training courses, and at social events organised via the workplace, such as team retreats and staff meetings.
- Keeping reliable, accurate, complete, objective and timely records in respect of our own roles and FRIDA's institutional, legal and management compliance and reporting obligations, according to agreements set. Such records could include emails, meeting notes or formal minutes, reports, etc. that document significant decisions, processes, or issues arising and how they've been resolved, as well as those required or reasonably expected by the work processes FRIDA has put into place (e.g. processes for grant making decisions, managing Board decisions).
- Maintaining the confidentiality of information relating to the business, property, affairs and operations of FRIDA even after our roles at FRIDA cease.
- Respecting the privacy and confidentiality of personal and sensitive information about individuals even after our roles at FRIDA cease.
- Respecting the intellectual property (including copyright) of FRIDA and of others and not using it otherwise than permitted.
- Using FRIDA's assets and resources in a safe, secure, professional, economical, competent, and socially and environmentally responsible manner, not for personal gain and taking into account the legal context.
- Ensuring that we do not make public comments including statements to the media about FRIDA and its activities without consulting others as needed, and as guided by FRIDA's advocacy strategies.
- Ensuring that any statements that we do make on behalf of FRIDA are not defamatory, insulting, misleading, deceptive or likely to bring FRIDA into disrepute.
- Ensuring that it is clear when we make personal statements in any medium and are known to be associated with FRIDA, that we are expressing our own views and not speaking on behalf of FRIDA.

#### V. We support health, safety and wellbeing by:

 Working in a manner that protects and promotes our own and others' wellbeing and safety and adheres to FRIDA's health, care and safety policies, procedures and protocols.

#### VI. We support Feminist Safeguarding by:

- Ensuring a safe environment and culture for all children and teenage girls with whom we
  come in contact during the course of our work, including offering the child with healing
  justice support by a trained healing justice practitioner;
- Abiding by and referencing the Safeguarding Code of Conduct.

## **Policy**

## **Acceptance of Gifts**

FRIDA staff members may accept small gifts as non-monetary tokens of appreciation such as postcards, T-shirts or souvenirs from grantees, advisers, donors or partner organisations but larger gifts (USD \$50 and above) are the property of FRIDA. If in doubt, the staff member should consult with their immediate supervisor.

It is considered a breach of FRIDA's code of conduct to accept bribes or significant gifts (except small non-monetary tokens of appreciation) from governments, beneficiaries, donors, suppliers or others, which have been offered as a result of their employment.

### **Alcohol and Drugs**

FRIDA commits to a harm reduction approach and the de-stigmatization and non-discrimination of people who use drugs or face addiction to drugs or alcohol. FRIDA also seeks to uphold collective safety and shared spaces without any pressure to consume drugs or alcohol. FRIDA expects its staff to uphold a strong sense of personal and collective responsibility when representing FRIDA at all public and private meetings or events. In line with these principles, the use of illegal hard drugs and the overconsumption of alcohol is prohibited while a staff member is representing FRIDA at meetings or events.

## Romantic & Sexual Relationships between Staff/Board/Consultants

In line with FRIDA's Conflict of Interest principles, engaging in romantic or sexual activities with other current FRIDA staff members and consultants is strongly discouraged. Supervisors and managers are forbidden from engaging in romantic or sexual relationships or activity with any of their direct supervisees and, in the case of Board Members, all FRIDA staff. In the event that staff members or consultants enter a romantic or sexual relationship/activity they are required to inform FRIDA's HR.

This applies both to relationships, romantic or sexual, established prior to joining FRIDA or starting while in FRIDA.

#### **Violence and Harassment**

The Workplace Violence and Harassment Policy is separate and is included in this Handbook. Further details with respect to FRIDA's policy on Violence and Harassment are outlined below in Section 3.9.

## Confidentiality

FRIDA's staff members are expected to hold in confidence key information related to projects that are considered to be confidential. This includes all activist and group contact details and other sensitive information related to their work in volatile contexts. Refer to FRIDA policies on

Holistic Security for more information on sensitive information and digital security. Staff members who breach confidentiality by sharing information with individuals unconnected to FRIDA in a manner that could compromise FRIDA's interests or those of its grantees may be subject to discipline, initially with an oral or written warning. This includes abiding by the digital security and communications guidelines to ensure confidential information isn't compromised.

#### **Conflict of Interest**

FRIDA is a charitable foundation and its employees and representatives have a responsibility to serve the purpose of the foundation as defined by its By-Laws. Employees and representatives have a duty to conduct the affairs of the organisation in a manner consistent with these purposes and not to advance their personal Interests. Staff are required to support and advance the interests of FRIDA and avoid placing themselves in situations where their personal interests actually or potentially conflict with the interests of FRIDA.

The conflict of interest policy is intended to guide FRIDA and its staff, including employees, and consultants to identify, evaluate, and address any real, potential, or apparent conflicts of interest that might, in fact or in appearance, be inconsistent or at odds with the values and ethical standards of the organisation. This policy is part of FRIDA's commitment to transparency and accountability in its actions and with its stakeholders.

A conflict of interest refers to situations in which personal, occupational or financial interests may affect, or appear to affect, a staff's objectivity, judgment or ability to act solely in the best interests of FRIDA.

- A conflict of interest may be real, potential or perceived in nature.
- A real conflict of interest arises where a member of the staff has a <u>private or</u> <u>personal interest</u>, in the affairs of FRIDA for example, when a member of the staff has a personal connection, or a close family connection or family interest would benefit in some way from FRIDA.
- A potential conflict of interest may arise when a member of the staff has a private or personal interest such as an identified future commitment.
- A perceived or apparent conflict of interest may exist when a reasonable, well-informed person has a reasonable belief that a member of the staff has a conflict of interest, even if there is no real conflict.
- A perceived or apparent conflict of interest related to family members.
- There is a duty to disclose, which applies to real, potential or perceived conflicts of interest.
- Full disclosure, in itself, does not remove a conflict of interest.

FRIDA's conflict of interest policy covers situations and examples listed under 'Definitions: Conflict of Interest' above, and is expected to apply to the following relationships:

- A family member, including a spouse, parent, sibling, child, stepchild, grandparent,
- grandchild, great grandchild, in-law, or partner;
- A close friend or close former colleague;

- A member of the past leadership of FRIDA (i.e. a founder, Board member, or Executive Director);
- Secondary function relationships (e.g. when a staff member is a member of the Board of another organisation, or holds any other role in another organisation);
- An entity in which the covered person has a material financial interest.

All efforts should be taken by all employees and representatives, including the Executive Director and members of the Board of Directors, to disclose any potential conflict of interest before the initial steps of any related transaction have taken place. Before accepting invitations for membership on the boards or any other role of other organisations, it is required that employees discuss the invitation with their direct supervisor, the Co-Executive Directors or with the Board of Directors Co-Chairs in the case of the Executive Director.

#### **GUIDELINES FOR FRIDA'S STAFF**

Given the interrelated nature of the FRIDA community, the complications of shifting roles from being a grantee partner, to a staff person, to a member of the Board of Directors and/or Associates, to an advisor and the need to ensure that FRIDA as a whole, can guard confidential information and protect itself from real or perceived conflicts of interest, FRIDA has established a set of guidelines:

- Staff must not use their position, confidential information, or an organization's time, materials, or facilities for private gain or advancement or the expectation of private gain or advancement.
- Collective research and writings done in the context of the job (ie as a representative of FRIDA) is the sole property of the organization, not the individual staff. If the staff member involved in the creation of the collective research material would like to make use of it externally, they must consult FRIDA to do so.
- Honoraria or fees paid for speaking engagements or writings done in the context of the
  job (ie as a representative of FRIDA) belong to the organization not the individual staff.
   On a case by case basis, FRIDA may consider making an exception as per the request
  of the staff member.
- It is prohibited to accept additional paid work outside of FRIDA that will interfere and detract from a staff's full-time employment. While FRIDA recognizes the right of staff to hold more than one job, staff are required to ensure that their health and their work performance are not compromised. This includes not spending FRIDA work time performing non-FRIDA related duties.
- A staff member must inform and receive approval from FRIDA management before
  accepting any type of work, paid or unpaid, with any FRIDA funders, members of the
  Board of Directors, potential funders, or any body or institution that fundamentally works
  in adversity with FRIDAs values and principles.
- Staff are **expected to hold in confidence any information** they obtain in their various roles. Breaches of confidentiality may result in disciplinary measures, and/or the termination of contract.

- To safeguard the best interests of FRIDA, staff are expected to hold in confidence all information related to projects that are considered to be confidential
- A member of staff cannot individually benefit financially from any FRIDA grants for the duration of their employment at FRIDA.
- If anyone in the FRIDA community is concerned about Conflict of Interest, either their own or someone else's, they should contact their supervisor or Co-EDs, or the Board Co-Chairs or FRIDA's HR if it involves the Co-EDs.

#### MANAGING CONFLICTS OF INTEREST

- Staff must be oriented to Policy, and openly disclose any real, potential or perceived conflict of interest as soon as the issue arises by filling out a conflict of interest form (Appendix B).
- The disclosure shall be sufficient to disclose the nature and extent of the member of the staffs' interest. Disclosure shall be made at the earliest possible time and, where possible, prior to any discussion and decision on the matter.
- If the member of the staff is not certain whether she or they is/are in a conflict of interest
  position, the matter may be brought before their supervisor or the Co-EDs for advice and
  guidance.
- If both Co-EDs are involved in the conflict of interest situation, then the matter may be brought before the Board Co-Chairs or FRIDA HR.
- If there is any question or doubt about the existence of a real or perceived conflict, the supervisor and/or Co-EDs and/or Board Co-Chairs and/or FRIDA HR will determine an objective team (not party to the conflict) of potentially members of the Board and staff to resolve the conflict or issue a decision on the conflict. The assigned individuals may choose to seek a lawyer's advice on the issue if necessary. The member of the staff potentially involved in a conflict of interest shall be absent from the discussion and shall not be party to the decision making process.
- It is the responsibility of other members of the staff who are aware of a real, potential or perceived conflict of interest on the part of a fellow member of the staff to raise the issue for clarification, first with the member of the staff in question and, if still unresolved, with their supervisor and/or Co-EDs and/or Board Co-Chairs and/or FRIDA HR.
- The member of the staff must abstain from participation in any discussion on the matter, shall not attempt to personally influence the outcome, and, unless otherwise decided by the supervisor, must leave the conversation for the duration of any such discussion or decision.
- The disclosure and decision as to whether a conflict exists shall be duly recorded by the supervisor.
- If a conflict of interest cannot be resolved to the satisfaction of the supervisor and/or Co-EDs and/or Board of Directors, or if a breach of duty has occurred, the staff member may be asked to resign or may be subject to removal pursuant to the By-laws and Policies of the organization.

## In support of FRIDA's standards of high ethical conduct, each member of the staff WILL NOT:

- Deceive, defraud, or mislead FRIDA members of the Board of Directors, staff members, and other associates, partners or those with whom FRIDA has business or other relationships.
- Misrepresent FRIDA in any negotiations, dealings, contracts, or agreements.
- Divulge or release any information of a proprietary or confidential nature relating to FRIDA's plans, mission, or operational databases without appropriate approval.
- Obtain a personal advantage or benefit due to relationships established by any staff member by use of the organization's name.
- Accept individual gifts of any kind in connection with the staff member's relationship with FRIDA. Any gifts are to be reported to the staff's supervisor, or the Board Treasurer in the case of the Co-EDs.
- Withhold their best efforts to perform their duties to acceptable standards.
- Engage in unethical or illegal business practices of any type.
- Seek to influence any decision making relating to grants to grantee partners that the staff member is involved with or connected to.
- Use FRIDA property, financial resources, or services of FRIDA personnel for personal benefit.
- Violate any applicable laws or ordinances.

Infractions of this Statement of Personal and Professional Standards of Conduct are to be reported directly to the staff member's supervisor and Co-EDs who shall, in her or their determination, bring the infraction to the full executive committee.