

Trócaire

Programme Participants Safeguarding Policy

Version Control

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0.1	11/10/2016	Overarching Safeguarding Policy. Approved by ELT 11/10/16	MR

Signed:

+ Wm. Crean

Bishop William Crean
Chairman of Trócaire

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Date:

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1.0 INTRODUCTION

Trócaire's Vision, Mission and Values state that we believe in the intrinsic dignity of every person, celebrate difference and aim to create relationships of mutual respect wherein the rights and dignity of every person are respected.

Trócaire's work is inspired and informed by Catholic Social Teaching, one of the fundamental principles of which is the dignity of each individual. The right to freedom from all forms of exploitation and abuse is implicit in this principle. Underpinned by Trócaire's organisational value of accountability, it is our policy to safeguard all individuals involved in Trócaire's work against risks of exploitation and abuse. Trócaire will not tolerate exploitative or abusive behaviour by anyone associated with the implementation of Trócaire's work and highlights this as a core commitment in the organisations' Stakeholder Accountability Framework.

1.1 POLICY / POSITION STATEMENT

Trócaire recognises that abuse of power has led, and continues to lead, to many forms of exploitation and abuse. The nature of our work creates a power differential between those employed by or working with Trócaire and programme participants and partners. We acknowledge that the potential exists for those who work with programme participants and partners to abuse their position of power. Trócaire's commitment to safeguarding is inclusive of its staff and all those with whom it comes into contact through its work.

Sexual Exploitation and abuse

Trócaire has a zero-tolerance approach to sexual exploitation and abuse of any person, child or adult, involved with its programmes, including:

- Any sexual activity with children under the age of 18, regardless of the age of consent locally (mistaken belief of age being no defence)¹.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to partners and programme participants.

Any staff member or third party (volunteer, visitor, consultant, other contracted party) who becomes aware of an incident or an allegation of exploitation or abuse, of a child or an adult, has a mandatory duty to report this immediately.

Trócaire is committed to ensuring its policies are fit for purpose and that the actions of its staff, contracted parties and other third parties including visitors and volunteers are always appropriate. We require that our partner organisations demonstrate a similar commitment.

¹ The sole exception to this may be where a staff member is legally married to a person under the age of 18. See the Staff Guide – Child Safeguarding Policy - International Programmes.

1.2 GUIDING PRINCIPLES

Our approach to safeguarding is guided by a number of key international principles and standards as set out in the Universal Declaration of Human Rights (UDHR); the UN Convention on the Rights of the Child (UNCRC, 1989); the UN Convention for the Elimination of all forms of Discrimination against Women (CEDAW, 1979) and in the national laws of the countries in which Trócaire works. We aim also to uphold the commitments made under the Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and non-UN personnel and the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (PSEA) (ST/SGB/2003/13)².

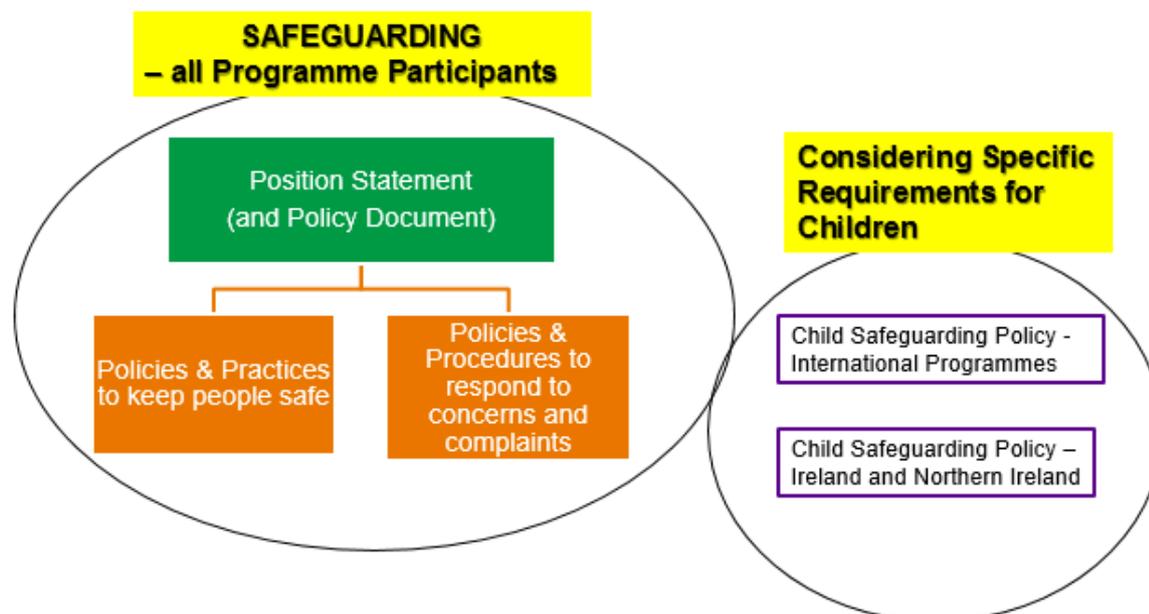
1.3 SCOPE

This document (and summary position statement – appendix 1) provides an overarching statement by Trócaire of a commitment to ensuring that exploitation or abuse does not occur in our activities and programmes. It is intended to span all of our work internationally (taking account of our particular model of working through partner organisations) and in Ireland/Northern Ireland.

This document does not seek to replace existing policies, but rather to provide an umbrella under which sit more specific policies focusing on priority considerations such as Safeguarding Children, Humanitarian Protection, Gender, Dignity at Work, and the Code of Conduct for Trócaire staff and third parties.

This position statement applies to all those involved with Trócaire, including paid staff, volunteers, board members, trustees, consultants, other contractors, and visitors to our programmes, both overseas and in Ireland.

2.0 OUR SAFEGUARDING FRAMEWORK



Trócaire Safeguarding Framework is built on our commitment to safeguard everyone connected with our work, while also recognising that individuals in some contexts may be more vulnerable to exploitation and abuse. The framework also recognises that Safeguarding requires a systematic approach which considers both internal and external risks. This approach involves a ‘Do No Harm’ attitude in relation to our work which is reflected throughout our policies and practices, some of which have a more significant impact for Safeguarding. Sections 3 and 4 below outline the policies that are required to realise our commitment. In this way safeguarding becomes an integrated component in all that we do, rather than being an isolated standalone consideration.

2.1 EXPLORING VULNERABILITY TO ABUSE AND EXPLOITATION

Typically the definition of ‘vulnerable adult’ in relation to safeguarding refers to individuals who may be more at risk of abuse because of their diminished mental capacity, physical support needs or who are elderly.

However, within the context of Trócaire’s work broader considerations are needed to include:

- Power imbalance
- Gender
- Ethnicity
- Affiliation to stigmatised group or religion
- Specific health related conditions (e.g. HIV)
- Poverty
- Displacement
- Other

Trócaire recognises that a power in-balance always exists between people who work for Trócaire and those with whom we work. Equally this power imbalance exists between partner staff and those with whom they work.

2.2 SAFEGUARDING CHILDREN

It is well recognised that children because of their evolving capacities and dependency on adults are particularly vulnerable. History has shown that children have been subjected to significant abuse because of this vulnerability. The UN Convention on the Rights of the Child clearly defines our obligations in relation to children. National legislation in many countries have specific legislation for Safeguarding and Protection of Children. Equally as an agency of the Catholic Church Trócaire upholds the Church's commitment to Child Safeguarding.

Trócaire has two policies outlining our Safeguarding commitments to children:

- Child Safeguarding Policy - International Programmes
- Child Safeguarding Policy - Ireland and Northern Ireland

A policy for children does not mean we are excluding others – it means we are documenting and implementing the specifics for this group for reasons outlined above.

3.0 CREATING SAFE ENVIRONMENTS

To promote a culture of safety and create a safe environment for those participating in our programmes we are committed to doing the following²:

- Be aware – of the importance of safeguarding and its level of priority within the organisation.
- Look at all ways – how Trócaire can safeguard and how we can support partner organisations to safeguard when implementing programmes (including recruitment practices and risk assessments).
- Learn the rules of the road – to learn and expand on what safeguarding standards mean in practice for Trócaire.
- Be alert – increase understanding and awareness.
- Develop policies and procedures that work. Adapting these documents due to learning from their practical application will be an ongoing process, including:
- Teach about issues – conduct workshops and training.
- Know how to respond – we are developing this in line with the introduction of a Complaint's Policy & Procedures for International Programmes.
- Keep working – we are making gradual progress and recognise that there is not a quick solution to safeguarding but are committed to continuously take steps to improve practice.

Stay on course for building safer environments for the implementation of our programmes.

² These points have been adapted from IFRC's 'Ten steps to creating safe environments'

Example of Policies to consider:

- Child Safeguarding Policy – International Programmes
- Child Safeguarding Policy – International Programmes - Staff Guide: providing information and guidance to assist employees to put the commitments outlined within this policy into practice
- Child Safeguarding Policy – International Programmes – Partner Guide: a specific guide outlining minimum requirements and contractual obligations for partner organisations
- Child Safeguarding Policy - Ireland and Northern Ireland
- Child Safeguarding Policy- Ireland and Northern Ireland – Staff Guide
- Trócaire Stakeholder Accountability Framework
- Global Code of Conduct
- Recruitment Policy & Procedures
- Dignity at Work Policy
- Dóchas Guide to Conduct on Images and Media <http://www.dochas.ie/code/>
- Humanitarian Protection Policy & Handbook
- Gender Mainstreaming Resource Pack

3.1 TROCAIRE GLOBAL CODE OF CONDUCT

Trócaire’s Global Code of Conduct (Annex 2) expresses the expectations of Trócaire from all employees, volunteers, consultants and third parties regarding the conduct and manner in which activities are carried out. It is an integral component of Safeguarding and forms part of the contractual terms and conditions of all Trócaire employees and representatives contracted to work with or for Trócaire. Special considerations are made to safeguard children and to prevent sexual exploitation and abuse of any individual.

By signing the Code of Conduct, each employee or third party commits to:

- work actively to promote the best interests of children and adults
- act in line with Trócaire’s Safeguarding Policies and relevant guides
- encourage children and adults to feel comfortable enough to point out attitudes and behaviour they do not like and make a complaint where necessary
- recognise that caution is required in one-to-one situations, particularly in sensitive situations such as dealing with programme participants including children who may be upset or traumatised.

4.0 RESPONDING TO CONCERNS

By creating safe environments we work to reduce the potential for things to go wrong. However, in the event when there is a concern it is important that our response is appropriate, professional and limits any further possible stress or impact. We are therefore committed to doing the following:

- Take all complaints and concerns seriously
- Conduct initial risk assessments and put in place measures to maintain safety pending investigation
- Respect confidentiality in relation to all complaints and concerns
- Consider support for all parties to a concern

- Follow-up and Act on all investigation recommendations
- Liaise with the relevant national authorities as appropriate in each country

Examples Policies to consider:

- Discipline and Grievance Procedures
- Complaints Policy - International Programmes
- Complaints Policy – Staff Guide
- Partners at Risk Policy
- Investigation Procedures
- Whistle Blowing Policy
- Fraud, Bribery and Corruption Policy

4.1 DUTY TO REPORT

All Trócaire employees and representatives have a duty to report any suspected incident of exploitation or abuse to the Safeguarding Focal Person and/or the Country Director (international) and Designated Child Protection Officer (Ireland/Northern Ireland). Failure to report such matters may result in disciplinary action.

It should be noted that abuse may be current, recent or historical. There are no time constraints for reporting and taking action within the remit of this procedure, although Trócaire encourages that reports be made as soon as knowledge, or suspicion, of an act of exploitation or abuse occurs

Trócaire is committed to ensuring that adherence to confidentiality, in the management of complaints and allegations of exploitation and abuse, is strictly maintained.

Trócaire will endeavour to protect all individuals in reporting, provided the allegations are made reasonably and in good faith, in line with Trócaire's Whistle Blowing Policy. Malicious complaints³ made against an individual, if these are proven, will result in appropriate corrective action under the Disciplinary Procedure up to and including dismissal.

5.0 PARTNER ORGANISATIONS

Internationally and across Ireland and Northern Trócaire works both in partnership with and through partner organisations. These include national and international NGO's, community based groups and civil society organisations.

Trócaire takes appropriate steps when selecting and working with partners to ensure that there is a shared commitment to implement minimum safeguarding standards and that the organisation takes appropriate measures to uphold these standards. This is included in contractual agreements such as

³ The term malicious implies the conscious misuse of the system to harm somebody. A false complaint can be based on a misunderstanding and be of good faith by the complainant (whistle-blowing).

Memorandum of Understanding (MOUs), grant agreements and is included in the Partner Minimum Requirements for Trócaire funding.

Trócaire may be unable to enter or continue a partnership if, after appropriate investigation, there are serious doubts about:

- The commitment and ability of the partner to uphold safeguarding standards and practice;
- The partner's capacity or willingness to take appropriate disciplinary measures to address issues of concern.

It is not the responsibility of Trócaire to develop safeguarding policies or procedures for Partner Organisations. However, Trócaire programme staff will support partners in identifying risk and in ensuring partners develop action plans for improving safeguarding policies and procedures.

Trócaire has been working on improving overall safeguarding practice for a number of years and we still have some work to do, recognising that it is an ongoing process. We also realise that it can take time for organisations to develop policies and procedures to implement the safeguarding standards.

ANNEX 1

Position statement on exploitation and abuse, including zero-tolerance for sexual exploitation and abuse

Introduction

Trócaire's Vision, Mission and Values state that we believe in the intrinsic dignity of every person, celebrate difference and aim to create relationships of mutual respect wherein the rights and dignity of every person are respected.

Trócaire's work is inspired and informed by Catholic Social Teaching, one of the fundamental principles of which is the dignity of each individual. The right to freedom from all forms of exploitation and abuse is implicit in this principle.

Statement

Trócaire recognises that abuse of power has led, and continues to lead, to many forms of exploitation and abuse. The nature of our work creates a power differential between those employed by or working with Trócaire and programme participants and partners. We acknowledge that the potential exists for those who work with programme participants and partners to abuse their position of power. Trócaire's commitment to safeguarding is inclusive of its staff and all those with whom it comes into contact through its work.

Sexual Exploitation and abuse

Trócaire has a zero-tolerance approach to sexual exploitation and abuse of any person, child or adult, involved with its programmes, including:

- Any sexual activity with children under the age of 18, regardless of the age of consent locally (mistaken belief of age being no defence)⁴.
- Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This includes exchange of assistance that is due to partners and programme participants.

Any staff member or third party (volunteer, visitor, consultant and other contracted party) who becomes aware of an incident or an allegation of exploitation or abuse, of a child or an adult, has a mandatory duty to report this immediately. The management of a report of an incident or an allegation of exploitation or abuse will follow the lines set out in Trócaire's Child Safeguarding Policy – International Programmes and Trócaire's Child Safeguarding Policy – Ireland and Northern Ireland.

⁴ The sole exception to this may be where a staff member is legally married to a person under the age of 18. See the Staff Guide - Policy on Child Safeguarding - International Programmes.

Trócaire is committed to ensuring its policies are fit for purpose and that the actions of its staff, contracted parties and other third parties including visitors and volunteers are always appropriate. We require that our partner organisations demonstrate a similar commitment.

Status and scope of this statement

This document provides an overarching statement by Trócaire of commitment to ensuring that exploitation and abuse do not occur in any way in its activities and programmes. It is intended to span all of our work internationally (taking account of our particular model of working through partner organisations) and in Ireland.

This position statement does not seek to replace existing policies, but rather to provide an umbrella under which sit more specific policies focusing on priority considerations such as Safeguarding Children, Humanitarian Protection, Gender, Dignity at Work, and the Code of Conduct for Trócaire staff and third parties.

This position statement applies to all those involved with Trócaire, including paid staff, volunteers, board members, trustees, consultants, other contractors, and visitors to our programmes, both overseas and in Ireland/Northern Ireland.

Our commitment to freedom from exploitation or abuse, including sexual exploitation or abuse, is guided by a number of key international principles and standards as set out in the Universal Declaration of Human Rights (UDHR); the UN Convention on the Rights of the Child (UNCRC, 1989); the UN Convention for the Elimination of all forms of Discrimination against Women (CEDAW, 1979) and in the national laws of the countries in which Trócaire works. We aim also to uphold the commitments made under the Statement of Commitment on Eliminating Sexual Exploitation and Abuse by UN and non-UN personnel and the UN Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (PSEA) (ST/SGB/2003/13)2.

ANNEX 2: TROCAIRE CODE OF CONDUCT

1. Policy Statement

Trócaire expects all Trócaire Representatives (all employees, volunteers, consultants and third parties associated with the organisation) to conduct themselves in manner in which represents the organisation in line with the strategic direction and in line with the organisations vision, mission and values. Each individual has a responsibility to ensure that they comply with the organisations code of conduct and also all other Trócaire Policies.

Vision: Trocaire envisages a just and peaceful world where people's dignity is ensured and rights are respected; where basic needs are met and resources are shared equitably; where people have control over their own lives and those in power act for the common good.

Mission: Inspired by Gospel values, Trócaire works for a just and sustainable world for all.

Values: Solidarity, Participation, Perseverance, Courage, Accountability.

2. Aim

This Code of Conduct expresses the expectations of Trócaire on all employees, volunteers, consultants and third parties regarding the manner in which activities are carried out and the conduct of all parties as a Trócaire representative. Trócaire expects its representatives to carry out their activities with the utmost integrity and in accordance with this Code of Conduct and all of its related policies and procedures.

Compliance with all legal obligations within all countries that we work in is also an explicit requirement. Due to the nature of our work, we also travel to places and meet people who have different cultural backgrounds and beliefs. Trócaire representatives are expected to respect and accommodate such cultural diversity. This Code of Conduct is based on Irish legislation and relevant international NGO commitments.

Trócaire views the safeguarding of Programme Participants (Children and Adults) as a critical part of its Mission, Vision and Values and so, lays particular emphasis on the prevention of abuse and exploitation by Trócaire employees, volunteers, consultants or other third parties in undertaking of Trócaire activities.

3. Scope

This Code of Conduct is applicable to all Trócaire employees, volunteers, consultants and other third parties carrying out activities on behalf of Trócaire. For the purposes of this document all parties will be referred to as a Trócaire Representative.

Managers have a particular responsibility in promoting and upholding this Code of Conduct and ensuring that all Trócaire Representatives for whom they are responsible understand and are compliant with this Code of Conduct.

Although Trócaire acknowledges that employees have both a professional and private life, external perceptions may not make the same distinction. There are many posts and / or locations and /or public fora (including electronic) where employees are identifiable as Trócaire

and their behaviour is attributable to Trocaire, therefore their behaviour could potentially damage the reputation of Trócaire. Employees are therefore, required to take account of the principles of the Code of Conduct and be aware of how their behaviour may be perceived both at work and outside of work.

Each Trócaire Representative is responsible for their own actions and the organisation will invoke necessary procedures to ensure that the organisation protects the rights and dignity of those whom we work with. Employees need to be aware that non-compliance with this code of conduct may invoke the disciplinary procedure, up to and including dismissal. All other representatives need to be aware that non-compliance with this policy may result in their time or services being removed from any association with Trocaire.

The organisation reserves the right to publically disassociate themselves with any individual or organisation whom brings Trócaire into disrepute.

4. Code of Conduct

Trócaire expects all employees, volunteers, consultants and other third parties to adhere to the core principles laid out in this Code of Conduct both in work and outside of work. As a Trócaire representative you are agreeing to carry out all activities for Trócaire in line with the following principles and standards:

Personal/Professional Conduct and Professional Ethics

- I shall ensure that my personal and professional conduct is, and is seen to be of the highest professional standard in keeping with the Mission, Vision and Values of Trócaire.
- I will treat all people equally, with dignity and respect.
- I will make myself aware of and will observe local laws in all countries where I may work, respect and be sensitive to local customs and culture.
- I will, in my activities both at home and overseas seek to ensure that the best interests of children are promoted and will not engage in behaviour that is likely to cause harm, including physical, sexual, emotional abuse, neglect and exploitation.
- I will ensure my behaviour both during and outside of work does not bring Trócaire into disrepute and does not impact or undermine my ability to undertake the role for which I am employed.
- I will not work under the influence of alcohol or drugs or illegal substances.
- I will not engage in sexual interaction with a person under the age of 18 years (regardless of the age of consent locally), or enter into a sexual relationship with a programme participant or into commercial sexual transactions (exchange of money, goods, services or favours)¹.
- I will display a primary duty or care to the company in respect of ethics and I will protect confidential information to ensure our continued success in line with our strategic plans.

¹ The sole exception to this may be where a staff member is legally married to a person under the age of 18. See the Employee Guide to the Policy on Child Safeguarding and Protection in International Programmes.

Appropriate Behaviour

- I will refrain from any form of bullying, harassment, victimisation, discrimination, abuse, intimidation or exploitation or in any other way infringe the rights of others by acting fairly, honestly and treating others with dignity and respect.
- I will not trivialise or exaggerate abuse or exploitation issues.

Criminal Activity

- I will avoid involvement in any criminal activities, activities that contravene human rights or those that compromise the work of Trócaire and our partners.
- I will not abuse or exploit programme participants in any way and will report any such behaviour of others to the management of Trócaire.
- I will not use, distribute, sell or be in possession of illegal goods or substances.
- I will immediately disclose to Trócaire any current and past criminal convictions or charges in particular those relating to child abuse, when I join Trócaire or whilst working with Trócaire.

Corruption and Conflicts of Interest

- I will declare any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of Trócaire – e.g. contract for goods/services, employment or promotion within Trócaire, partner organisations, civil authorities, or programme participants groups.
- I will act in accordance with the Fraud, Corruption and Bribery Policy including reporting any suspicious incidents to the relevant parties.
- I will notify Trócaire if I am nominated as a prospective candidate or another official role for any political party.
- I will disclose to Trocaire if I am member of a board of management, in either a paid or a voluntary.
- I will not act in situations in which my personal interests may conflict, or appear to conflict, with the position, interests or ethos of Trócaire or its Partner Organisations
- I will not accept gifts or favours from anyone whom we are carrying out our activities for or with.

Security, Health and Safety

- I will be responsible for my own health, safety and welfare
- I will not knowingly engage in any activity that could endanger my colleagues health, safety and welfare.
- I will make myself aware of situations which may present health, safety and security risks and manage these appropriately.
- I will comply with any local guidelines for security and in a manner consistent with Trócaire Security Policy.
- I will adhere to all organisational health and safety policies and procedures in force in my work place.

Safeguarding Programme Participants (Children and Adults)

- I will work actively to promote the best interests of programme participants (children and adults)
- I will act in line with Trócaire's Programme Participation Safeguarding Policy, Child Safeguarding Policies (International/Ireland/Northern Ireland) and relevant guides.
- I will encourage programme participants to feel comfortable enough to point out attitudes and behaviour they do not like
- I will recognise that caution is required in one-to-one situations, particularly in sensitive situations such as dealing with programme participants including children who may be upset or traumatised.

Protection of Information

- I will not release to others any private or confidential information including intellectual property relating to Trócaire (or for which Trócaire is responsible) to any person(s) outside the organisation unless it is legally required to do so or approved by my manager.
- I will not use Trócaire contacts, networks or other resources to advance my own personal or business activities or interests.
- I will use Trócaire name, logos and brand, whether communicating internally or externally, in line with Trócaire Visual Identity Guidelines to ensure protection of our reputation and brand.
- I will abide by data protection procedure, both for paper and electronic data.
- I will ensure to act responsibly with the information that I become aware of within my role with Trócaire and ensure that information or data is stored within the secure location.

I.T.

- I will not use the organisation's computer equipment or other technology, equipment or services in contravention with Trócaire I.T. Acceptable Usage policy and procedures to engage in any activity that is illegal under local, state or international law or that encourages conduct that would constitute a criminal offence. This includes any material that victimises, harasses, degrades, or intimidates an individual or group of individuals on the basis of gender, race, religion, sexual orientation, age, disability or ethnicity or other personal characteristic.

Media Visits and Photographic Guidance

- I will ensure that the portrayal of individuals and their circumstances is fairly represented in terms of their capacities and vulnerabilities, in line with Trócaire commitments under the Dóchas Code of Conduct on Images and Messages and additional guidelines listed in the Safeguarding Programme Participants Policy.

Resources and Assets

- I will ensure that I use Trócaire property, funds and resources to which I have access in a responsible and careful manner and am accountable for their use, according to Trócaire policy and procedural requirements. Resources and property include Trócaire vehicles; telephones, photocopiers, fax machines and stationery; other office equipment or equipment/resources belonging to Trócaire; computers, including the use of email, internet and intranet; and Trócaire accommodation (including Trócaire housing in international locations).
- Upon the end of my employment or service with Trócaire, I shall return all property issued to me by the Organisation.

Duty to Report

- I will report any concern, suspicion and/or incident which breaches the standards within this Code and any other Trócaire policy to the relevant party as outlined in the policy or directly to the Head of Human Resources. I will not intentionally make malicious or false accusations in relation to this Code against any individual.
- I will report concern, suspicion and/or incident which breaches the standards within this Code regardless of whether I feel it is current, recent or historical. There is no timeframe on reporting alleged breaches of this policy.

The above is not an exhaustive list of examples of how Trócaire Representatives should conduct themselves and representatives have a responsibility to use their own initiative and take careful considerations about the choices they make and the impact they can have on the organisation.

Breaches of this Code of Conduct, other employee policies and procedures, and other company procedures will be regarded as a breach of discipline and will be dealt with in accordance with the company's disciplinary code.

I agree to accept and apply the above Code of Conduct in its entirety.

Signed:

Name in caps:

Title:

Date:

For HR Only

Received by:

Received on:
