

CODE OF CONDUCT

VERSION	2
PERSON RESPONSIBLE	Rozana Australia CEO
DATE OF BOARD SIGN OFF	16 April 2021
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POLICY AMENDMENTS

This is a working document and subject to amendment. This Policy will be available in English, Hebrew and Arabic.

Any suggestions about this Policy should be directed to the Rozana Australia CEO so changes can be considered. Any amendments or changes to the Policy will be submitted to the Board for endorsement.

The CEO is responsible for maintaining this document, including updating confirmed changes, informing staff of the changes, and disseminating the latest version across the organisation.

Any changes or amendments involve the following steps:

- Updating the Document Version table on the first page;
- Updating the relevant provision in this manual;
- Replacing the updated version of the manual e.g., shared drives, Intranet;
- Printing a hard copy of the updated manual for the office;
- Communicating the changes to all staff; and
- Archiving the old version of manual.

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1. PREAMBLE

This policy was written by Rozana in Australia. It may be used as a template across all Rozana offices. Rozana operates five offices registered in each of Australia, USA, Canada, UK and Israel, which are part of the Rozana Global Alliance. In this policy, 'Chair' means Chair of Rozana International. Unless specified otherwise the 'Board' refers to the board of Rozana Australia.

2. INTRODUCTION

The Code affirms the values that govern the behaviours of all Representatives of Rozana (see Definitions section below) The Code is intended to be used by Representatives in determining what is right and proper behaviour. It has been developed to provide a set of guiding ethical principles, associated obligations and standards of conduct, to assist in determining acceptable standards of conduct.

The Code:

- Supports Rozana's Representatives of diverse backgrounds to work effectively across cultural differences;
- Serves as a reference point for decision making;
- Aims to ensure the promotion of a positive image of Rozana, its Representatives and the implementation of the projects with which it is associated, and
- Enables Rozana to manage risk by reducing the likelihood of damaging behaviours.

3. SCOPE & PURPOSE

This Code of Conduct applies to the following individuals: All Rozana staff, interns and volunteers including Board and Subcommittee members.

In addition to the above mentioned, Rozana may, at its sole discretion, ensure contractors, consultants, suppliers and grantees also comply with this policy. In this situation, a Rozana staff member with responsibility for engaging the contractor, consultant, supplier or grantee will take steps to ensure their compliance with this policy, including through their declaration of any interests.

Where this policy is contradicted by contractual obligations to funders, the contractual obligations must be adhered to. Exceptions to such obligations should be sought from funders prior to entering into contracts and any substantive areas of difference must be drawn to the attention of the Executive Director of the Australian Office.

This Code of Conduct applies to the following activities:

- Behaviour in connection with work with or for Rozana, even if it occurs outside normal working hours;
- Behaviour during work activities with or for Rozana, for example when dealing with donors and other stakeholders;

- Behaviour at Rozana-related events, for example social functions, Directors Missions etc. and
- On social media: As interactions on social media with other persons if the views you represent are in violation of the code outlined herewith.

4. CONSEQUENCES OF BREACHING THIS CODE

Rozana expects that Representatives will report any breach of this Code (whether known or suspected, actual or potential – refer to point 11). Failure to raise known or suspected issues may result in disciplinary action, including termination of employment or engagement or involvement with Rozana. Some of these forms of conduct may also be unlawful and a breach under applicable laws.

5. ACFID CODE

Rozana is a member of the Australian Council for International Development (“ACFID”) and a signatory to the [ACFID Code of Conduct](#) (“ACFID Code”). Rozana is committed to full adherence to the requirements of the ACFID Code. Compliance with these requirements ensure transparency and accountability, improve international development effectiveness and increase stakeholder trust.

6. IMPLEMENTATION

We will explain to all Rozana Representatives the implications of this Code for their role during induction and in ongoing training. All Rozana Representatives will be made aware of the importance of this Code, and their own responsibility in upholding and implementing the requirements of this Code.

In addition, as part of the induction process, new Rozana Representatives will undertake the online learning module, [Introduction to the ACFID Code of Conduct](#), and a copy of their Certificate of Completion will be kept on file. All Rozana Representatives will be made aware of the importance and implications of the ACFID Code for their role during induction and in ongoing training, and their own responsibility in upholding and implementing the requirements of the ACFID Code.

7. VALUES

It is our policy to conduct business in a professional manner with the highest standards of integrity and in accordance with applicable laws and regulations.

Rozana’s values include:

- a) Always acting with fairness, honesty and integrity;
- b) Being aware of and complying with all laws and regulations;
- c) Maintaining the highest standards of professional behaviour, and
- d) Dealing honestly through all communications and interactions with external parties.

Rozana does not tolerate sexual misconduct, harassment and bullying. Rozana regards these as serious and treats complaints in a sensitive, fair and confidential manner.

Rozana is committed to promoting and protecting the interests and safety of children and has zero tolerance for child abuse or child exploitation. Rozana maintains the highest standards of vigilance in relation to child safety and requires that its partners and sub-grantees do likewise.

Rozana is committed to the promotion of gender equality, equity and non-discrimination.

Rozana champions diversity in its workplace and is committed to the protection and promotion of diversity within its workforce including in relation to sexual orientation, gender identity and disability.

8. STANDARDS OF CONDUCT

8.1 Personal Conduct

In the performance of all Rozana and project related responsibilities, all Representatives must strive to achieve the highest standards of conduct and accountability, and to demonstrate high standards of professional integrity and honesty, and to:

- Act in good faith, with care and diligence, and in the best interests of Rozana and the stakeholders of the projects with which it is associated;
- Treat all persons, including children, with respect, dignity and reasonable compassion, in an equitable and fair manner, and with proper regard for their rights and obligations, regardless of race, colour, gender, religion, ethnic or social origin or disability;
 - Comply with, and be seen to act within, the spirit and letter of the law and the terms of this Code;
 - When travelling internationally, to respect the laws and values of the host country;
 - To obey any lawful direction, instruction or order given by any person authorised by law to do so;
 - To disclose any financial wrongdoing, corruption, bullying, transactional sex, misconduct or maladministration of which they become aware;
 - To act in the best interests of, and in a manner that will not reflect adversely on, Rozana, its partners and the stakeholders in projects with which it is associated, and the wider community;
 - To conduct themselves in a manner that does not discredit the individual person, having regard to their position within Rozana;
 - To perform any duties associated with their position conscientiously, courteously, efficiently, impartially, and to the best of their ability, in a manner that bears the closest external scrutiny and meets all legislative and Rozana standards;
 - To set and maintain standards of leadership that are consistent with Rozana's goals and policies, be seen at all times to act in support of these goals and policies, and actively contribute to their achievement;

- To seek to maintain and enhance the confidence of partners, colleagues, members, project stakeholders and the wider community in the integrity of Rozana;
- To safeguard privacy and confidentiality of matters of a personal nature relating to donors, beneficiaries and other colleagues;
- To adhere to management principles and practices that foster the rights and wellbeing of Representatives, and
- To ensure equitable and fair workloads are shared.
- All Representatives are specifically prohibited from:
 - Engaging in intimidation, bullying, harassment, sexual or other forms of exploitation or unlawfully discriminating against or otherwise abusing any person, including children (see 7.7 below);
 - Improperly using their official powers or position, or allowing them to be improperly used;
 - Inappropriately distracting other Representatives from carrying out their duties, or - inducing other Representatives to breach this Code.

8.2 Conflict of Interest

Representatives are expected to perform their duties in such a manner that stakeholder confidence and trust in the integrity of Rozana and the projects with which it is associated are preserved.

Representatives should endeavour to arrange their private or other official affairs in a manner that will prevent any actual or apparent conflict of interests from arising wherever foreseeable.

Where a conflict of interest does arise between the private or other official interests of a person and the official duties or responsibilities of that person within Rozana or in relation to a project with which Rozana is associated, the person is to disclose details of the conflict to the Board or relevant Project Coordinator.

Any conflict of interests relating to an individual's association with Rozana will be resolved in favour of Rozana's and the public interest.

In the event that a person is obliged to adhere to a Code other than that applying in Rozana (such as other professional codes) and ethical conflicts or dilemmas arise as a result, it is the person's responsibility to draw such conflict of interests to the attention of the Board for resolution in consultation with the relevant professional body.

8.3 Political Activity

Any political activity by Representatives is to be conducted in a private capacity. Representatives are expected to clearly separate any official action or views from any political action or views, and to ensure that no conflict of interests arises between such activity or comment and their official duties.

Rozana Representatives travelling overseas must never participate in any political or religious advocacy, demonstrations or attempts at conversion with nationals while representing the organisation.

8.4 Access to Rozana Resources

In the performance of Rozana responsibilities or responsibilities relating to projects with which Rozana is associated, Representatives are expected to:

- Use or manage both human and material resources efficiently, effectively, and only for the benefit of Rozana, its partners and the projects with which Rozana is associated;
- Avoid waste, misuse, abuse, or extravagant use, of resources of any kind belonging to or provided by Rozana;
- Ensure that all facilities, physical resources and other property belonging to or provided by Rozana are given due care and maintenance;
- Conserve and safeguard Rozana assets;
- Budget honestly, and
- Respect the environment by engaging in environmentally friendly work practices.

8.5 Gifts and Benefits

In their official capacity, Representatives are not to solicit any personal or other benefits, except where specifically authorised by Rozana (e.g., legitimate pursuit of donations or sponsorship in accordance with Rozana policy).

Rozana recognises that there will be instances where Representatives will be offered benefits (gifts, etc.) and that under certain circumstances it will be appropriate for Representatives to accept them. However, Representatives are to avoid all situations in which the acceptance of any benefit could create an actual or apparent conflict of interests with their official duties.

Representatives are to consider the following when making this decision:

- Who is offering the benefit?
- What is the purpose of the offer?
- What is the timing of the offer?
- Does the value of the benefit exceed a nominal value?
- Is the offer likely to be regular or repetitive?
- Is acceptance of the benefit consistent with other Rozana policy?
- Could the acceptance compromise you, another person or Rozana?
- Could acceptance of the benefit stand external scrutiny.

If there is any doubt about the intention or integrity of the source making an offer, Representatives are expected to reject the offer.

Where the value of the offer exceeds a nominal value of a \$20 or equivalent, and refusal of the benefit may cause offence, the offer should be accepted and immediately brought to the attention of the board.

8.6 Payments to Government Public Officials

No Representatives are allowed to provide a benefit, or cause a benefit to be provided, or offer or promise to provide a benefit, or cause an offer or promise of provision of a benefit, to any public official. This relates to any person employed, contracted, performing work, or representing any government body, public enterprise, or any international agency including any international or multilateral agency.

Should any representations be made by any persons soliciting such payment or the provision of any such benefits, then this should be reported immediately to the Board of Rozana.

On occasions local custom may suggest providing minor benefits to public officials to expedite minor routine government action. Rozana does not condone such activities and in the event that they are likely to occur, this should be discussed with the Chair of the Board and CEO and permission given in writing prior to taking action. Examples of such activity would include expediting the issuance of visas or permits.

Any Rozana persons found not adhering to the above policy, will be subject to disciplinary action. Should Rozana Representatives not adhere to the policy in the context of a project with which Rozana is associated, any funding of the project by Rozana may be terminated.

8.7 Child Protection

Rozana maintains a zero-tolerance policy towards child abuse.

No Representatives are to engage in behaviour that is intended to shame, humiliate, belittle or degrade children, including using language towards children that is harassing, abusive, sexually provocative or culturally inappropriate.

All Representatives are required to adhere to the following rules when dealing directly with children (excluding where applicable the person's own child(ren)), and in doing so take responsibility for ensuring that they do not place themselves in a position where they risk allegations being made against them:

- Not invite unaccompanied children into a private residence unless they are in immediate risk of injury or in physical danger;
- Not sleep close to unsupervised children, unless necessary and then only in the presence of another adult;
- Not access or store child pornography via any medium;
- Refrain from physical discipline of children;
- Provide gifts that are not part of a Board approved activity. Any such gifts must be issued as part of an official Rozana ceremony, or as part of an approved project (e.g. the provision of iPads to assist children with educational activities)

When photographing or filming children for organization-related purposes Representatives must:

- Endeavour to comply with local traditions or restrictions for reproducing personal images;
- Obtain the informed consent of the child or parent/guardian of the child by explaining how the images will be used;
- Ensure the images present children in a dignified and respectful manner, not a vulnerable or sexually suggestive manner, and
- Ensure file labels do not reveal identifying information about the child if sending images electronically.

Representatives are obliged to immediately report concerns or allegations of child abuse in accordance with Rozana's Child Protection Policy.

Depending on the severity of the infringement, failure to abide by these policies will result in termination of your association with Rozana.

8.8 Anti-Discrimination and Harassment

All Rozana Representatives are required to treat each other, and other people with whom they come in contact in our workplace, with respect, dignity and courtesy. In particular, Rozana Representatives must not commit any form of discrimination or harassment (including sexual harassment) in our workplace.

Rozana Representatives must not discriminate against another person for any of the following reasons:

- Pregnancy, or breastfeeding;
- Sexual orientation, gender identity, intersex status, marital or relationship status
- Race, colour, descent, nationality, national origin, ethnicity or ethno-religious origin;
- Religious belief or activity;
- Political belief or activity;
- Responsibilities as a carer or family responsibilities;
- Disability or impairment;
- Age; or
- Service in the voluntary defence forces.

Rozana Representatives must not conduct themselves or behave in a manner that would be considered harassment or sexual harassment. *Harassment is any form of behaviour that is unwelcome (not wanted) or uninvited (not asked for) or a reasonable person would have anticipated would humiliate, offend or intimidate someone.*

Sexual harassment occurs when a person:

- makes an unwelcome sexual advance, or an unwelcome request for sexual favours, to another person; or
- engages in other unwelcome conduct of a sexual nature in relation to another person in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the other person exposed to the conduct would be offended, humiliated or intimidated.

Rozana Representatives must consider how their behaviour is viewed by others that they are dealing with. Different social or cultural backgrounds may lead a person to look at the same conduct differently from another person. It is possible to commit discrimination, harassment or sexual harassment whether the conduct was intentional or unintentional. It is not a defence that a person did not intend to humiliate, offend or intimidate another person.

8.9. Anti-Bullying

Rozana Representatives are required to take reasonable care to ensure that they do not behave in a manner which may adversely affect the health and safety of others in the workplace.

Rozana Representatives must not engage in any form of workplace bullying. Workplace bullying is the repeated and unreasonable behaviour directed towards a worker or a group of workers that creates a risk to health and safety, including behaviour that is victimising, humiliating, intimidating or threatening.

Single incidents of unreasonable behaviour are unlikely to be bullying but they can present a risk to health and safety and will not be tolerated.

Please refer to the Anti-Bullying Policy for further details about what will constitute bullying and our expectations of Rozana Representatives in this area. Representatives who become aware of an incident of workplace bullying should report it to their manager immediately.

Rozana staff, volunteers and contractors must be familiar with and comply with corporate policies including Rozana's:

- EEO, Discrimination, Bullying and Harassment Policy
- Child Protection Policy
- Diversity and Inclusion Policy
- Feedback and Complaints Policy
- Partnership Policy
- Environmental Management Policy.

9. FINANCIAL WRONGDOING

Rozana regards and treats seriously any financial wrongdoing and maintains a zero-tolerance position towards financial wrongdoing.

Forms of Financial Wrongdoing include:

1. Bribery – the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages.
2. Corruption – the abuse of entrusted power for private gain.
3. Financial Wrongdoing – behaviour that is illegal or immoral with regards to financial transactions. Includes bribery, corruption, fraud, money-laundering, terrorism financing and violation of sanctions imposed by the Australian government.
4. Fraud – Dishonestly obtaining a benefit, or causing a loss, by deception or other means. It extends to benefits obtained or derived that can be both tangible and intangible.
5. Money Laundering – the process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal.
6. Terrorism Financing – intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act. Prior to signing any agreements regarding Board appointments or with partners, the name of the individual or organisation will be checked against the [DFAT 'Consolidated List'](#) of persons and entities subject to targeted financial sanctions (imposed by resolution of the UN Security Council), and the Attorney-General's Department '[List of Terrorist Organisations'](#) as per Division 102 of the Criminal Code 1995. Rozana will not engage with any individuals or entities that appear on those lists.

All Rozana Representatives are responsible for financial wrongdoing prevention and detection. In the case of any incident of suspected or detected financial wrongdoing arising from the actions of Rozana Representatives, the incident must be reported immediately to the Rozana Board.

In the case of any incident of suspected or detected financial wrongdoing arising from the actions of someone in a Partner Organisation and affecting a project with which Rozana is associated, this should be handled accordingly to the Rozana's formal internal procedures and must be reported to the Rozana Israel Executive Director, the Rozana Chair and thereafter to the Rozana Israel Board and International Board. This report will be in writing and will initially include the following information:

- Name of the project or activity;
- Name of parties involved;
- Details of the suspected/detected financial wrongdoing, including a chronological account of the facts giving rise to the financial wrongdoing;

- Details of any witnesses;
- Copies of relevant documents;
- References to any relevant legislation;
- A nominated contact person;
- Any other relevant information (e.g., possible local sensitivities, relevant in-country agencies that can assist with investigations) and
- The current status of any inquiries.

Subject to the decision of the Rozana International Board, Rozana will investigate the suspected or detected financial wrongdoing and the Board will agree on a strategy to be followed to obtain redress, where appropriate, in light of the investigation's findings. If the financial wrongdoing has occurred in the context of a project with which Rozana is associated, Rozana funding may be terminated in accordance with Rozana's Partnership Policy. If there is reasonable prospect that laws were broken, police in an appropriate jurisdiction will be informed.

10. PARTNER DUE DILIGENCE

A full list of the parameters that Rozana considers before signing a Partnership Agreement is provided in Rozana's Partnership policy. However, as a minimum, due diligence requires that the following parameters are assessed, and if it is not possible to work with the potential partner to remedy any deficiencies with respect to these parameters, Rozana will not proceed with signing an agreement.

- The potential partner must be legally registered and have effective governance arrangements such as a Board, management structure, etc.
- The potential partner must have appropriate systems to manage its funds and maintain records and capacity to manage and control funds.
- The potential partner does not appear on any of the prohibited entities listed in Section 9 above.
- The potential partner has the capacity to implement key safeguarding and risk policies, such as child safeguarding, protection of vulnerable persons from sexual exploitation, financial wrongdoing, complaints, separation of development and non-development activity.
- The partner has the capacity to apply funds or resources in accordance with the promise to the donor, our strategy and our specific instructions.

11. DETERMINING APPROPRIATE CONDUCT

In the first instance, Representatives are expected to assess the appropriateness of their own conduct in relation to decisions or actions they take as follows:

- Would your decision or action withstand scrutiny by the community or Rozana?
- Will your decision or action comply with this Code of Conduct and Rozana policy?
- Does your decision or action comply with all laws, regulations and rules?

- Is your decision or action fair to the community, your family, your colleagues and others?

Rozana's responsibility in determining whether a person's conduct is right and proper in terms of this Code requires examination of:

- The nature of the conduct exhibited, and
- The context in which the conduct takes place.

Appropriateness of conduct is determined within this framework, with reference to the expectations of Rozana, applicable legislation, the wider community and the provisions of this Code.

Where the conduct of a person does not satisfy the self-assessment criteria above, or will otherwise adversely reflect on Rozana, it will be deemed by Rozana as inappropriate hereunder.

12. BREACHES OF STANDARDS OF CONDUCT

All Representatives are expected to familiarise themselves with this Code and ensure that its provisions are observed. Failure to comply with standards of conduct outlined in the code, without valid reason, will be addressed as an issue that may involve either termination of the person's position in Rozana or termination of Rozana's funding of a project or partnership with Rozana.

Representatives requiring advice or assistance concerning their obligations under this Code should seek assistance from the Rozana.

When assessing perceived or actual breaches of the Code of Conduct, the Rozana Board will adhere to the principles of natural justice, i.e., the affected person must be given the opportunity to present their case and have that information considered before any decision is made; and the decision maker must have no personal interest in the matter to be decided, have no bias as to the outcome, and act in good faith throughout the process.

13. CODE OF CONDUCT AGREEMENT

I, *(insert full name)* _____ acknowledge that I have read and understand Rozana's Code of Conduct and agree that throughout my association with Rozana that I/my organization staff and volunteers involved with a project with which Rozana is associated will adhere to this code.

Signature

On behalf of: _____ *(to be filled when signing on behalf of an organisation)*

Date: ___ / ___ / ___

DOCUMENT CONTROL

Date	Version	Revised Description	Reviewed / Updated by
16 April 2021	V1	Created	Board of Directors
6 March 2023	V2	<p>8.6 Addition of highlighted words for clarification:</p> <p>On occasions local custom may suggest providing minor benefits to public officials to expedite minor routine government action. Rozana does not condone such activities and in the event that they are likely to occur, this should be discussed with the Chair of the Board and CEO and permission given in writing prior to taking action. Examples of such activity would include expediting the issuance of visas or permits.</p>	Board of Directors