



**Digital**  
Freedom Fund

# Code of Conduct

## 1 Preamble

The code of conduct, which expresses the core beliefs of DFF, has been jointly developed by the Board, management and employees of DFF. The code of conduct will be communicated to everyone working for or with DFF and it is expected that it is acknowledged, respected and accepted by anyone engaging with DFF in such capacity. The Board is committed to complying with this Code of Conduct and encourages everyone engaging with DFF to comply with this Code of Conduct.

## 2 Conduct of business

### 2.1 Compliance with the law

Compliance with the law, rules and regulations is a fundamental principle for responsible work conduct. DFF adheres to statutory legal regulations and requirements at all times. Where national laws are more restrictive than the rules set out here or in any other internal rules of DFF, national laws take precedence.

### 2.2 Avoiding conflicts of interest

DFF business decisions are made exclusively in the best interest of the organisation. Any conflicts of interest arising from personal matters or other business or non-business activities, including those of relatives or other related parties, should be avoided. Conflicts must be dealt with openly and transparently, in accordance with DFF's *Code of Conduct relating to Conflict of Interest*.

### 2.3 Preventing money laundering

DFF is fully aware of its legal obligations to prevent money laundering and acts in compliance with these legal obligations by not facilitating or participating in money laundering activities of any sort.

In case of doubt, all employees are required to report unusual financial transactions which give grounds to suspect money laundering to the responsible person for review, especially those transactions involving cash.

### 2.4 Anti-bribery

DFF or any other person acting on its behalf has not directly or indirectly made any bribes, rebates, payoffs, influence payments, kickbacks, illegal payments, illegal political contributions, or other payments, in the form of cash, gifts, or otherwise, or taken any other action, to influence its actions or behaviour or to secure an improper advantage.

DFF nor any person acting on its behalf shall accept (directly or indirectly) any bribes, rebates, payoffs, influence payments, kickbacks, illegal payments, illegal political contributions, or other payments, in the form of cash, gifts, or otherwise, or taken any other action, to influence its actions or behaviour or to secure an improper advantage.

Any person working for or acting on behalf of DFF is not allowed to accept and shall not accept any gifts or invitations (whether social or business related) with a value in excess of (the local currency equivalent of) EUR 50, unless with the prior approval from DFF's management. Any person working for or acting on behalf of DFF shall report to DFF's management any gifts or invitations received with a value less than (the local currency equivalent of) EUR 50.

## 2.5 Sustainability

DFF shall use reasonable commercial efforts to incorporate sustainable products, components and supplies in its operation and will support sustainable initiatives.

## 3 Conduct between colleagues and employees

### 3.1 Equal treatment and non-discrimination

A culture of equal opportunities as well as mutual trust and respect is of key importance to DFF. DFF promotes equal opportunities and prevents discrimination in the recruitment, promotion, training and development of employees. DFF treats all employees equally, regardless of factors such as gender, age, cultural or ethnic group, sexual identity, ability, religion or world view.

### 3.2 Human and labour rights

DFF respects all internationally recognised human rights and supports and promotes their observance. DFF rejects all forms of forced and child labour.

### 3.3 Occupational health and safety

The safety and health of its employees is a priority for DFF. DFF therefore provides a safe workplace for its employees and third parties in compliance with all regulations and applicable laws; where required and adequate DFF will provide the necessary training and education to its employees in this respect.

### 3.4 Physical and digital security

Physical and digital security is of high importance for DFF; therefore, DFF takes all measures to ensure protection of personnel, hardware, software, networks and data from any actions threatening to physical integrity, including fire, theft or terrorism. *[Note: DFF physical and digital security policy is in the making]*

## 4 Conduct at DFF and during events

DFF defends, promotes and encourages everyone's right to free expression, however the below forms of behaviour will not be tolerated in any form.

- Sexist, racist, ageist, homophobic, transphobic, ableist, religiously insensitive or exclusionary jokes.

- Abusive, insulting, offensive or degrading language; any language that encourages harassment or hate speech, or reinforces systems of oppression.
- Unwelcome photography or recording (if you would like to take photos or recordings, permission from those involved should be received first).
- Deliberate intimidation, stalking or following.
- Unwelcome physical contact, violence or threats of physical violence.
- Sexual attention or advances of any kind.
- Forced intoxication or drug-taking.
- Sustained disruption of talks, presentations, or other events.
- Advocating for, or encouraging, any of the above behaviour(s).

Any infringement should be reported in accordance with the House Rules or Complaints Procedure as the case may be.

It is of the utmost importance to DFF that the rules and the spirit of the code of conduct are respected during events which are held or sponsored by DFF. DFF, therefore, expects the House Rules to be observed at all times.

## **5 Handling of information**

### **5.1 Reporting**

DFF attaches great importance to being open and clear in its reporting and communications regarding internal matters and when dealing with third parties. DFF implements transparent reporting and communication lines both internally and externally.

### **5.2 Confidential company information**

DFF takes all steps required to suitably protect confidential information and business documents from being accessed and inspected by unauthorised colleagues or other third parties, in line with DFF's *Confidentiality Policy*.

### **5.3 Data protection and information security**

The protection of personal data is of great importance to DFF, especially with regard to donations and the grantmaking process.

DFF collects and processes personal data only when it is necessary for its activities or when it is required by law. Personal data may be collected or processed only where there is a legal basis under the applicable data protection laws.

Further details are contained in DFF's *Data Privacy Policies*.

## **6 Whistleblowing**

Should an employee or third party become aware of possible infringements of laws or the rules set out within this code of conduct, such an infringement may be reported to DFF's Complaints Commission via [complaints@digitalfreedomfund.org](mailto:complaints@digitalfreedomfund.org).

## **7 Implementation of DFF's code of conduct**

It is of the utmost importance to DFF that the rules and spirit of this code of conduct are properly implemented in DFF's working environment. Every employee and all third parties involved with DFF should, therefore be familiar with the code of conduct and are expected to adhere to its rules.

To the extent a legal entity is involved as a third party, DFF invites them to make the DFF code of conduct available to its employees and/or inform them with the rules comprised in this code of conduct.

For future questions relating to the code of conduct all employees, as well as third parties, can contact [contact@digitalfreedomfund.org](mailto:contact@digitalfreedomfund.org).