



1. Introduction

Jumbo Fish Farm (JFF)'s mission is to strive for lasting change for those who live in poverty, are excluded, or are caught in a crisis, while ethically making a return on its investments in the blue economy focusing mainly on producing quality fingerlings and fish. Jumbo Fish Farm is committed to the people of the communities in which it works and those that it supports, the stakeholders they work with and to those who support the work of Jumbo Fish Farm. Staff, partner organisations, sub-contractors and consultants (hereafter together called Parties) have a responsibility to JFF to strive for and maintain the highest ethical standards in the day-to-day conduct of their work in accordance with the JFF's mission and core values.

This JFF Code of Conduct is considered a key tool for the prevention of harassment, exploitation and inappropriate behaviour by Parties towards beneficiaries, JFF staff or other people. It describes acceptable standards of behaviour and promotes good practice. By this document, third parties know or get to know what behaviour is expected of them, stakeholders know what behaviour is acceptable by JFF and its representatives and what to do if there is a breach of this code.

JFF deems all forms of abuse – including harassment, violence and exploitation – towards women, children and vulnerable individuals to be unacceptable, and recognises the Company's duty to protect those it works with and serve. Our **Code of Conduct** defines acceptable standards of behaviour and promotes good practice as well as defining the violations of the code and describing misconduct. We also set out what Parties must do if there is a breach of conduct.

JFF's **Child Safeguarding Policy** is incorporated in this document. We adhere strictly to the UN Convention on the Rights of the Child (1989) – which applies to any person under the age of 18. The abuse or exploitation of children - in any form - is considered a direct violation of this Code and may, additionally, attract criminal and other legal penalties under Kenyan law.

It is a Jumbo Fish Farm duty to protect children throughout the scope of our work. **Parties shall protect children from all forms of physical or mental violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse.**



It is a requirement that all staff (paid employees, volunteers and interns), full or part time, agree to abide by the Child Safeguarding Policy – and specifically agree to work in accordance with this Code of Conduct which makes clear the responsibilities for safeguarding children and expected behaviour of staff. This is a mandatory requirement. JFF’s induction procedures require new staff members, volunteers and interns to read this document in full, and sign to confirm and acknowledge that they have understood the contents and consent to conducting themselves accordingly.

It is a mandatory requirement that all staff (paid employees, volunteers and interns) full or part time, partner organisations, sub-contractors and consultants, agree to abide by the Child Safeguarding

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Policy – and specifically agree to work in accordance with this Code of Conduct which makes clear the responsibilities for safeguarding children and expected behaviour of parties. JFF’s contracting procedures require partners, sub-contractors and consultants to read this document in full, and sign to confirm and acknowledge that they have understood the contents thereof and consent to conducting themselves accordingly.

It is imperative that representatives of partner organisations and beneficiaries are informed of, and have access to, the Jumbo Fish Farm Code of Conduct. Any form of unacceptable behaviour which breaches the Code of Conduct must be reported.

Our HR department undertakes training sessions for staff to raise awareness, and discuss the meaning and purpose of the Code of Conduct. Management will take similar actions towards partners, sub-contractors and consultants. HR monitors this document in practice via a range of programme, department and unit evaluations.

The JFF Code of Conduct is, therefore, an agreement to be implied in and read into all partners, sub- contractors, employees and consultants’ agreements and interactions with JFF from the time of first contact.

Jumbo Fish Farm Code of Conduct

1. **Respect, equal treatment and non-discrimination on the basis of race, religion, political persuasion, gender, age, sexuality, culture or disability**, without adverse distinction of any kind, within the company and its dealings with third parties.
2. **Respect different social and cultural values and traditions.** Zero tolerance to offending local customs or practice in the conduct of business, unless they are contrary to law or established best practices.
3. **Respect for Human Rights and Humanitarian principles** of Humanity, Neutrality, Impartiality and Independence.
4. Respect for the **environment and biodiversity** and protect the natural environment of the local community.
5. Contribute to the **greater independence of employees and local community** with whom we work and, under no circumstances, further their economic, political, or socio-cultural dependencies. We will attempt to build local capacities and contribute to strong, inclusive and dynamic community structures, deliberately engaging in corporate social responsibility aimed at a sustainable future, free from the poverty of our local communities.
6. **Hold ourselves accountable** both to those with whom we do business and and those from whom we accept resources, products and services. JFF will attempt to collaborate with - and advocate for - social change, with civil society actors, as well as with governmental and intergovernmental organisations.
7. **Accept my place in the JFF hierarchy** and accept the authority of employees placed above me.
8. Maintain **appropriate confidentiality** concerning sensitive information about JFF, its partners and other JFF employees.

9. **Carry out my activities** in conformity with the objectives, policies and priorities stipulated in my engagement contract and the Company's business plans and work towards the achievement of these goals. I will only carry out activities which conform to my role description. If the workload of a colleague is too much, I am willing to assist.
10. **Openly discuss** conflicts with parties involved if they arise. I will document the problems and agreements reached. I will not discuss relational conflicts behind the back of the other party, but try to resolve the problem together - if necessary involving a third party. Importantly, will keep confidential information and trade secrets secret and with the required degree of confidence and privacy.
11. **Establish and maintain open and transparent** channels of communication with partners and colleagues - and inform them, as fully as possible, about my activities when requested or relevant.
12. Maintain an environment which promotes the **implementation of this Code of Conduct and Child Safeguarding Policy and prevents sexual exploitation and abuse**. The implementation of the Code of Conduct and Child Safeguarding Policy is the responsibility of all Managers at all levels - as well as the Jumbo Fish Farm Integrity Focal Points in the Jumbo Fish Farm Country Offices and in the International Office in the Netherlands . They have a special responsibility to ensure staff are informed about, receive, understand and sign the Code of Conduct. It is also their responsibility to ensure staff receive training on the Code of Conduct during annual inductions and/or during performance appraisals.
13. **Raise any concerns and queries** concerning the Code of Conduct with my Manager/Supervisor or the Jumbo Fish Farm Integrity Focal Point (contact details at the Reception).
14. **Immediately report any suspicions or allegations of behaviour which goes against the principles of the Code of Conduct** to the Jumbo Fish Farm Integrity Focal Point, including any form of (sexual) exploitation and abuse – even if the information or allegation is vague. I will report regardless of whether the suspicions or allegations concern a colleague, partner organisation staff or

third party. I will report via e-mail, telephone or in person. I understand that no actions will be taken against me when I – as required – report concerns in good faith and that disciplinary measures will be taken against staff:

- a. • for retaliating against a colleague who reports concerns or cooperates with an
- b. investigation for maliciously and falsely reporting misconduct; and
- c. • for not co-operating with an investigation.

15. **Treat children with respect and equality**, regardless of their age, sex, language, religion, opinion or nationality, ethnic or social origin, status, class, caste, sexual orientation, or any other personal characteristics.
16. Help children to **take part in decisions** which concern them according to their age and their level of maturity.
17. Maintain a **culture of communication and create trust** with the children and their families, communities, other staff and volunteers and representatives of partner organisations so that concerns may be shared and discussed.
18. **Use non-violent, positive behaviour and positive disciplining methods** when supervising children. Avoid corporal punishment in all its forms whether at work or in private.
19. **Encourage children and communities to speak openly** about their interactions with adults and with each other.
20. **Inform children and communities** of their rights and responsibility to report any worrying situations and how they can raise a concern.
21. **Empower children** so that they are in a position to better protect themselves.
22. Make sure that **another adult is present or try to be visible** when I am in contact with a child.

23. **Try to preserve the child's autonomy** and make sure that I do not do things that a child can do for herself/himself.
24. **Plan activities and organise the workplace** in such a way so as to minimise the risk of harm, taking into account the age and development of the child.
25. Ensure that information concerning children, families and communities **remains confidential**.
26. Behave in a way that **sets a good example** (avoid smoking, showing disrespect towards colleagues, etc.).
27. **Obtain permission** from the child and their parents/caretakers before taking a photograph, recording or using the child's image, what they have said or their history. This includes explaining to children and their parents how the photos or messages will be used.
28. Ensure that the child **does not pose in a degrading manner** or in a way that may be interpreted by others as having sexual connotations.
29. **Raise any concerns and queries** concerning the Code of Conduct and Child Safeguarding Policy & Child Protection Policy with my manager/supervisor.
30. Immediately **report any suspicions or allegations of behaviour** which goes against the principles of the Child Safeguarding Policy and Code of Conduct to the Child Safeguarding or Integrity Focal Point. This includes any form of child abuse – even if the information or allegation is vague.
31. **Do not accept** payment, excessive gifts or other advantages to or from representatives of counterparts, public officials or any other party that is meant to influence my activities.
32. **Not to** enter into obligations (social, political or economic) that will jeopardise the independent execution of my assignments.

33. I will **not ask for (sexual) favours or money** in return for anything done in my line of work. I understand that (sexual) exploitative behaviour and/or abuse constitute acts of gross misconduct and are therefore grounds for disciplinary measures, including immediate termination of employment.
34. I will **not engage** in any form of sexual activity with children (persons under the age of 18) regardless of the age of majority or local age of consent. Mistaken beliefs regarding the age of a child is not a defence.
35. I will **not exchange** money, employment, goods, services or other favour or advantage for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
36. I will **not engage** in any form of sexual activity with customers or other professional acquaintances since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of JFF's work, business and reputation.
37. Refrain from being **under the influence of drugs or alcohol** while performing official duties.
38. **Avoid** engaging in other types of sexually exploitive or sexually abusive behaviour.
39. I will **not close my eyes to, ignore or fail to report** any concern, suspected violation or violation of the Code of Conduct and Child Safeguarding Policy to the JFF Integrity Focal Point or management.
40. I will **not** touch children, use language or make suggestions in an inappropriate manner, to provoke, harass or degrade the child or show disrespect for cultural practices. This includes acting in a manner which is likely to have a negative impact on the child's confidence and feelings of self-worth.
41. I shall **not exploit** a child for labour (for example through domestic work).

42. **I shall not discriminate against or treat** children unequally or unfairly for example via favouritism or excluding others.
43. **I shall not invite a child or their relatives** to my home or develop a relationship with a child and/or their family which may be considered outside normal professional boundaries.
44. **Avoid** being under the influence of drugs or alcohol while working with or having charge and care of children.
45. **Do not watch, publish, produce, or share** pornography showing children, and/or show such material to children.
46. **Do not show the faces** of children who are exploited sexually, victims of trafficking, victims of abuse, in conflict with the law, linked to armed groups or who can easily be located, even if their identity has been modified.
47. **Do not take and publish** photos when children are entirely naked or dressed in a manner which is not adapted to the situation in which they are represented.
48. **Do not represent children unnecessarily** as victims (weak, powerless, unassisted, desperate).
49. **Do not publish a story or image** which may endanger the child, their family or community.
50. **Do not use photos which have not been checked and approved** by JFF about children on personal websites or social networks (such as Facebook, TikTok, Twitter and Instagram).
51. **I shall not maintain contact with children and their families** via social networks, unless a specific JFF project requires me to do so, and I have been given explicit permission.



52. I shall not close my eyes to, ignore or fail to report any concern, suspected violation or violation of this Code of Conduct.

Actions by Jumbo Fish Farm in case of violation of the Code of Conduct

I understand that, in the event of suspicions or allegations made against me of my violation of the Code of Conduct, JFF will take any lawful action deemed necessary, which may include, but is not limited to:

- A. Providing assistance to the victim and taking immediate steps to protect and support her/him.
- B. Attempting to establish the facts in the most objective manner possible - the presumption of innocence at all times prevailing - while protecting the reputation and confidentiality of the people involved and of the business.
- C. Undertaking disciplinary actions, which may result in my suspension or termination of employment contract, partner agreement or sub-contract for contractors or consultants.
- D. Initiating judicial proceedings and/or reporting to the competent authorities any violation of the Code of Conduct which may breach national or County legislation.
- E. Taking appropriate measures in order to ensure that such incidents do not occur again, for example, informing other organisations which may apply for professional references regarding the termination of contract due to violation of the Code of Conduct (within the legislative framework applicable to the protection of information and as may be permitted by labour laws).

Acknowledgement and Acceptance

I, the undersigned,(Full name of person or company or business):

Declare that I have received, read or had read and explained to me and understood the Jumbo Fish Farm Code of Conduct and Child Safeguarding Policy & Child Protection Policy (hereinafter, 'the Code of Conduct') and I commit to know and agree to work in accordance with it.



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I understand that any failure to uphold the Code of Conduct may result in the termination of my engagement with Jumbo Fish Farm, or further disciplinary or judicial proceedings as mentioned above.

Furthermore, I declare that I have no criminal records regarding an offence towards anyone (which I have not previously declared) and nor do I know of any reason why anyone would deem me unsuitable to work with JFF its customers and partners, including children.

I have never been investigated, resigned, or lost any previous position due to a breach or suspected breach of a Code of Conduct, due to sexual exploitation, sexual abuse or any other form of harassment. Where necessary, I have fully informed Jumbo Fish Farm about such an instance.

I understand that by not reporting this to Jumbo Fish Farm prior to signing a contract or commencing other formal engagement, this may result in disciplinary or judicial proceedings or the termination of such engagement as mentioned above. Jumbo Fish Farm reserves the right to inform other institutions - which may apply for professional references of the termination of contract or other engagement for a serious violation of the Code of Conduct - within the legislative framework applicable to the protection of information and as may be permitted by labour and contract laws.

I understand that this Code of Conduct forms an integral part of my employment contract or other professional or business engagement with Jumbo Fish Farm.

Signatory's full name:
 Telephone Number:
 Date:
 Organisation:
 Signatory's function/Designation:
 Signature:

Jumbo Fish Farm Integrity Focal Point
 Matungu Hatchery-Kakamega County