

Andaman Discoveries Ethical Code

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Andaman Discoveries Ethical Code

Introduction

This document is an ethical code for Andaman Discoveries employees, volunteers and interns to use as a guideline for behavior inside and outside of our office. It highlights key human recourse topics, code of conducts and issues so employees, volunteers and intern know their rights within our company and also how to act in our company.

Ethical Principles and Core Values

Andaman Discoveries is a professional organization. The way we treat each other in the office, is the same as how we treat the communities and our clients, with:

-  *Respect*
-  *Sincerity*
-  *Friendliness*
-  *Supportive compassion*
-  *High-quality professionalism*
-  *Happiness*
-  *And a whole lot of fun*

Decision Making and the Ethical Code

When you are faced with challenges about how to behave within our company, please ask yourself the following questions and make an informed decision.

- *Is it legal?*
- *Does it comply with the code?*
- *Does it reflect our company values and ethics?*
- *Does it respect the rights of others?*
- *If you are unsure about any of the answers, ask.*

Reporting/Speaking Up

The company encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal or suspicious behavior immediately. The company does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern:

- *Report and speak directly to Andaman Discoveries Director Pi Tui*
- *Report and speak directly to Client Relations Manager Lindsey Reding*
- *These are the main contact full-time Andaman Discoveries' staff. If you feel uncomfortable speaking with them and would like to report to Pi Bee, Pi Nat or Noon please feel free to do so.*
- *If the report is made to the above three people, they will then report to Pi Tui or Lindsey Reding for formal report*

No Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- *Unfair dismissal, demotion or suspension*
- *Unfair denial of a promotion, transfer or other employment benefit*
- *Bullying and harassment, either in person or online*
- *Exclusionary behavior*
- *Any other behavior that singles out the person unfairly*

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Equal Opportunity and Freedom of Association

The company will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class. Andaman Discoveries strive for equal opportunities for all present and potential employees and therefore do not discriminate against anyone for their membership of or affiliation to any trade unions or political parties, employees are free to join trade union if they wish.

Harassment

Treat all fellow employees, customers, business partners, community partners, local guides and other stakeholders with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- *Yelling at or humiliating someone*
- *Physical violence or intimidation*
- *Unwanted sexual advances, invitations or comments*
- *Visual displays such as derogatory or sexually-oriented pictures or gestures*
- *Physical conduct including assault or unwanted touching*
- *Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences*
- *Please note that sexual and romantic advances in Thailand are different from Western countries. We prohibit dating, flirting and advancing local members of our community. Please speak with Thai staff about what romantic and sexual advances mean and look like in Thailand*

Bullying

We are committed to ensuring that our employees, our contractors and our customers work in safe and respectful environment that is free of bullying. This means inside the office and when you are working with local communities and schools. Bullying can include:

- *Spreading malicious rumor or gossip*
- *Excluding or isolating someone socially*
- *Establishing impossible deliverables*
- *Withholding necessary information or purposefully giving the wrong information*
- *Intimidating someone*
- *Impeding someone's work*
- *Unfairly denying training, leave or promotion*
- *Constantly changing work guidelines*
- *Sending offensive jokes or emails*
- *Criticizing or belittling someone constantly*
- *Tampering with a person's personal belongings or work equipment*

Conflicts of Interest

As Andaman Discoveries operates in a small community, we ask you to be discreet and careful about your relationships (if any) with the local community. Any socializing usually becomes transparent quite easily in a small town so please tread very carefully in this respect. The ramifications can be great and can affect yours and the Andaman Discoveries' Reputation. Please respect this. If you have any queries or doubts, please do not hesitate to discuss with any Andaman Discoveries full time staff.

Employees should avoid the types of situations that can give rise to conflicts of interest.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to Director Pi Tui or Client Relations Manager, Lindsey Reding.

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External Communication on Behalf of the Company

Employees are permitted to communicate on behalf of the company through social media forums and also emails. If interviews are requested or any special communication is requested, please present in our weekly team meeting and get permission from Director Pi Tui before giving interview. Interns and volunteers need permission from Client Relations Manager Lindsey Reding before posting on social media forums or communicating on our behalf as Andaman Discoveries.

Confidentiality

The company and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed. Information for confidentiality listed below:

- *Customer lists*
- *Supplier lists*
- *Pricing information*
- *Terms of contracts*
- *Company policies and procedures*
- *Financial statements*
- *Marketing plans and strategies*
- *Trade secrets*
- *Any other information that could damage the company or its customers or suppliers if it was disclosed*

Privacy

The company complies with the requirements of the country's and international privacy laws.

The company and its employees do not disclose any private, personal information of:

- *Employees*
- *Customers*
- *Suppliers*
- *Competitors*
- *Third parties*

Employees store all personal information securely, mark it as confidential and store it only for as long as it is needed for the purpose for which it was collected.

When providing personal information, employees limit access to only those with a clear business need for the information.

To ensure that the work at Andaman is secure, all passwords are only available to you if it is pertinent to your work. If you require the password to access the central email addresses, blog, google analytics or other tools, please request it from the Finance Staff.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorized access to personal information, to Director Pi Tui.

Competition, Fair Dealings and Anti-trust

While the company competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits and compliant with competition/antitrust laws.

Employees are required to:

- *Communicate the company's products and services in a manner that is fair and accurate, and that discloses all relevant information*
- *Familiarize themselves with the company's fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition*
- *Consult with Director Pi Tui or Pi Nat before engaging in any new practice that may affect fair competition*
- *Refrain from price fixing, bid rigging, and any other anti-competitive activities*
- *Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments*
- *Advise Director Pi Tui immediately of possible violations of fair competition practices*

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Anti- Bribery, Corruption and Facilitation Payments

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Employees are to uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. Employees are bound by local and national laws. For Thailand we will refer to the Ministry of labor for legal compliances <http://www.mol.go.th/laws> and <http://www.mol.go.th/en/laws>

In many jurisdictions, making Facilitation Payments is illegal. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.

Where the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind, then pay the Facilitation Payment and report this to your line manager as soon as possible.

Employees are to:

- *Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery and corruption policies*
- *Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments*
- *Refuse any offer or request for an unlawful payment and report the incident to Pi Nat*
- *Follow Andaman Discoveries Anti-Bribery and corruption policy and adhere to its guidelines*

Gifts and Entertainment

This policy does not prohibit normal and appropriate hospitality (given and received) to or from Third Parties.

You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- *it is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;*
- *it is given in your name and not in the name of the Company;*
- *it includes cash or a cash equivalent (such as gift certificates or vouchers);*
- *it is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and*
- *it is given secretly and not openly.*

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

When in doubt, employees should check with Andaman Discoveries Director Pi Tui before giving or receiving anything of value.

Political Contributions and Religious Affiliation

The company does not make political contributions or promote their religious affiliation to local community groups, schools or learning centers.

Employees are free to support any political party or entity on a personal level and free to practice any religious belief at any time. However this must be kept separate from company business.

Charitable Contributions

The company may make charitable contributions to causes and organizations that support Andaman Discoveries' core mission and vision or that is associated with any cause relating to our North Andaman Network Foundation. Employees should present the charitable contribution in our weekly meetings and an overall decision will be made.

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Record Keeping

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records.

Employees are required to:

- *maintain these records and protect their integrity for as long as required*
- *maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes. Contact the correct Andaman Discoveries staff member for this*
- *dispose of your records accordingly*

Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

Data Protection

Andaman Discoveries adopts the OECD guidelines on the protection of personal data for staff and our clients as follows:

- *Notice - data subjects should be given notice when their data is being collected;*
- *Purpose - data should only be used for the purpose stated and not for any other purposes;*
- *Consent - data should not be disclosed without the data subject's consent;*
- *Security - collected data should be kept secure from any potential abuses;*
- *Disclosure - data subjects should be informed as to who is collecting their data;*
- *Access - data subjects should be allowed to access their data and make corrections to any inaccurate data; and*
- *Accountability - data subjects should have a method available to them to hold data collectors accountable for following the above principles.*

Proper Use of Company Assets

The company requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only.

Assets include facilities, equipment, computers and information systems, telephones, employee time, confidential and proprietary information, corporate opportunities and company funds.

Suspected incidents of fraud, theft, negligence, and waste should be reported to the Director of Andaman Discoveries, Pi Tui.

Money Laundering

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing, and must take steps to prevent inadvertent use of the company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- *attempted payments in cash or from an unusual financing source*
- *arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer*
- *unusually complex deals that don't reflect a real business purpose*
- *attempts to evade record-keeping or reporting requirements*

Insider Trading

Employees may learn information about the company, associates, clients, business partners or other companies that is not publicly available. It is illegal for any individual to use information obtained in this way for personal gain or to share it with others.

Employees are prohibited from:

- *Buying or selling securities based on non-publicly available knowledge gained in the course of business*
- *Providing information or tips, or encourage another person to buy or sell securities based on inside information*

Employees are required to report suspected insider trading immediately to Director of Andaman Discoveries, Pi Tui.

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Health and Safety

Management and employees are firmly committed to enabling all work activities to be carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of workers, community partners, school partners, authorised visitors, and anyone else who may be affected by our company. Employees, interns and volunteers are required to read our Health and Safety policy and follow accordingly.

Responsibilities

Management:

Will provide and maintain as far as possible:

- *a safe working environment*
- *safe systems of work*
- *facilities for the welfare of workers*
- *information, instruction, training and supervision that is reasonably necessary to ensure that each worker is safe from injury and risks to health*
- *a commitment to consult and co-operate with workers in all matters relating to health and safety in the workplace*
- *a commitment to continually improve our performance through effective safety management.*
- *provide basic first aid equipment in the office and out of the office when with guests*
- *facilitate and assist employees and guests with local medical attention when needed*

Workers:

Each worker has an obligation to:

- *comply with safe work practices, with the intent of avoiding injury to themselves and others and damage to plant and equipment*
- *take reasonable care of the health and safety of themselves and others*
- *wear personal protective equipment and clothing where necessary*
- *comply with any direction given by management for health and safety*
- *not misuse or interfere with anything provided for health and safety*
- *report all accidents and incidents on the job immediately, no matter how trivial to Director of Andaman Discoveries, Pi Tui*
- *report all known or observed hazards to Andaman Discoveries Director, Pi Tui*
- *carry first aid kit with them when translating with guests in the village*

Application of this policy

We seek the co-operation of all workers, customers and other persons. We encourage suggestions for realising our health and safety objectives to create a safe working environment with a zero accident rate.

This policy applies to all company operations and functions, including those situations where workers are required to work off-site.

Environment and Sustainability

The company is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities, selection of suppliers and other business activities.

The company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection. To remain ethical, AD staff members will follow our sustainability policy, internal environment policy and our sustainability monitoring and evaluation policy.

We follow and commit to general our Environmental Policy as per below:

- *-only run the air conditioning during the very hot season for 5 hours a day*
- *-shut down computers each evening*
- *-use Thai style toilet with bucket water to flush*

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- *-recycle all paper, plastic, glass, cans*
- *-use plastic boxes or banana leaves for take away meals, instead of styrofoam or plastic bags*
- *-use reusable bags and water bottles when traveling*
- *-use local hand made soap for cleaning the office*
- *-when we have the option drink coffee that was made in Thailand*
- *-print on both sides of the paper and use recycled paper for printing*
- *-encourage our guests to bring reusable water bottles and bags when they travel*

Animal Welfare and Protection of Biodiversity

Andaman Discoveries does not condone the use of captive animals or animals to be used as entertainment or as a tourist attraction or excursion. If providing elephant experiences, we require a “no ride rule” and follow the Travel Life criteria for animal welfare and the World Animal Protection Criteria for ethical animal sanctuaries and encounters that promote the welfare of the animal. All animals have been acquired legally and in accordance with the Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES (www.cites.org).

Child Protection

All Andaman Discoveries staff is to read and follow our Child protection policy and adhere to its rules and also report any behavior seen that is against the policy to Andaman Discoveries director, Pi Tui.

Information Technology

The company expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

The company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures

To ensure that the work at Andaman is secure, all passwords are only available to you if it is pertinent to your work. If you require the password to access the central email addresses, blog, google analytics or other tools, please request it from the Finance Staff.

The company does not use software for which it does not have a license.

Internet Use

The company understands that occasional personal use of the internet during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their managers if in doubt.

However, the company does not allow internet use to support a personal business, political venture, or embarrass the company and its customers.

The company respects the right of employees to use social media for personal and professional purposes.

Employees are responsible for complying with company policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

Employees are required to:

- *Reveal their relationship with the company when commenting online on issues related to the company*
- *Respect the privacy of other employees and refrain from publishing photos of them without their consent*
- *Ensure any information they post related to the company is accurate. Information should be read by client relations manager, Lindsey Reding, before being posted*
- *Comply with the rules of the social media sites they use*

Employees must not:

- *“Pretext”, or pretend to be someone they are not online*
- *Speak on behalf of the company if they are not expressly authorized to do so*
- *Share confidential information about the company, its clients, stakeholders or suppliers*

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- *Post comments or pictures that could harm the company's brand, reputation or commercial interests*

Dress Code

Dress code at Andaman Discoveries is conservative casual. For women we ask that you dress respectfully. When out of the office, please respect the same protocol even when on recreational activities in Kuraburi unless you are in a touristy area. In village we have strict guidelines for dress code please read Guide to in Village for information on this.

Corporate Social Responsibility

The company understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers.

One goal of the corporate social responsibility procurement program is to build partnerships with like-minded organizations by actively seeking out business partners who are the most environmentally and workforce friendly.

Forced Labor: The company and its suppliers shall employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which the company conducts its business.

Child Labor: The company and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

Responsible Environmental Impact: The company and its suppliers shall follow AD's suitability policy and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

The company encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.

Charitable involvement is important to the company and our North Andaman Network Foundation continues to conduct and facilitate charitable giving projects using fifty percent of Andaman Discoveries' Profits each year.

Ethical Code Acknowledgement

By certifying to the company ethical code, you acknowledge that:

For example:

- *You have read the ethical code and understand your responsibilities related to it.*
- *You have had the opportunity to ask questions to clarify any unclear aspects of the code.*
- *You agree to abide by its principles.*
- *You agree to report to the company any violations of the code.*
- *You agree to cooperate in any investigations of violations of the code.*