

FREEDOM BUSINESS

Code of Excellence



Version 1.0



**FREEDOM
BUSINESS
ALLIANCE**

CONTENTS

ACKNOWLEDGMENTS	2
BACKGROUND	3
METHODOLOGY & STRUCTURE	5
APPLICATION	7
DEFINITIONS	10
COMMITMENTS OF FREEDOM BUSINESSES	14
COMMITMENT 1 Mission to End Human Trafficking	15
COMMITMENT 2 Governance, Transparency & Accountability	17
COMMITMENT 3 Good Working Conditions	20
COMMITMENT 4 Fair Pay	23
COMMITMENT 5 Healing-Centered Workplace	25
COMMITMENT 6 Concern for External Stakeholders	28
IMPLEMENTATION & COMPLIANCE	31
APPENDIX	32
REFERENCES	33
CONTACT	35



ACKNOWLEDGMENTS

The Beneficiary Employees who provided their consent, and participated in focus group discussions, to share with us their experiences of working in a Freedom Business.

Leaders from the following Freedom Business Alliance Members:

- Aruna Project
- Basha Boutique
- Beauty For Ashes Nepal
- Better Way Designs
- For Dignity
- Freeleaf
- Joyya
- NightLight Collection
- People Kraft
- Regenesys
- Rethreaded
- Savhera
- Starfish Project
- Sudara
- SutiSana
- Swahlee
- Tamar Center
- Thai Village
- The Loyal Workshop
- Threads of Hope Hellas
- World For Good

Mats Tunehag, BAM Global

Helen Sworn, Chab Dai International

Dr. Melinda Gill, Renewsiya Foundation

Dr. Lauren Pinkston, Center for Business as Mission, Lipscomb University

BACKGROUND

MISSION OF FREEDOM BUSINESS ALLIANCE

Today over 40 million people are enslaved worldwide. 80% of those rescued from modern slavery, also known as Human Trafficking, will be re trafficked absent safe employment opportunities.

To fight modern slavery and exploitation we need a strategy that includes more than rescue, one which addresses the economic roots of the problem. Freedom Business is that strategy, but it is not without incredible challenges. Freedom Business exists to create employment opportunities for survivors of Human Trafficking and those At Risk.

Today there are almost 100 Freedom Businesses operating in more than 28 countries around the world. It is the mission of Freedom Business Alliance (FBA) to scale the Freedom Business Movement. Our vision is a job for every person healing from modern slavery and vulnerable to exploitation.

As an industry facilitator for Freedom Business, FBA removes the many barriers to growth and scale that no single business can address on its own.

MISSION OF FREEDOM BUSINESS

The work of Freedom Business is considered by many of our Members to be more than just a business, but a calling. While most businesses seek to hire the best and brightest, Freedom Businesses seek first to create employment opportunities for those who are most often unskilled and have experienced trauma, upholding a

commitment to the vulnerable in society and a belief in the inherent high worth of every human being. Therefore our Members work to create workplaces that are safe and trauma-informed. And while safe employment is a vital component of freedom, they believe true freedom requires more. It requires a belief in one's own worth that grows with professional, intellectual, emotional, and spiritual development, most effectively achieved in a community that offers love, hope, and healing. This is why our Members go further than simply offering a job, but endeavor to create this type of supportive and formative community within their places of work. Thus, they uphold the belief that business, when intentional, can serve as an optimal vehicle for healing and transformation. These intentions require incredible sacrifice and investment. This document describes the high standards and commitments undertaken in pursuit of this calling.

PURPOSE OF FREEDOM BUSINESS CODE OF EXCELLENCE

This Code of Excellence defines the business practices that sustain holistic freedom and distinguish the work of Freedom Business. It contains six Commitments upheld by Freedom Businesses, defines common terms used within our industry, and provides a framework for implementation. The Freedom Business Code of Excellence is informed by Members of Freedom Business Alliance and is based on common Freedom Business values, the International Labour Organization (ILO) conventions, human rights and other internationally recognized principles. It is also informed by other aligned, internationally-recognized codes, standards and commitments such as those from the World Fair Trade Organization, World Economic Forum, Chab Dai, and the Business As Mission (BAM) Manifesto.

It is our hope this Code of Excellence will articulate the incredible, impactful work being done within our Freedom Businesses around the world, and serve as a rallying point, propelling continued excellence and improvement among current and prospective industry leaders as they go about the work of growing the number of employment opportunities to survivors.

METHODOLOGY & STRUCTURE

METHODOLOGY

In creating this Freedom Business Code of Excellence, FBA reviewed a number of existing standards, charters, best practices and other similar documents on subject matter relevant to the work of Freedom Business. These include the documents of the Business as Mission movement, World Fair Trade Organization Fair Trade Standard¹ and World Fair Trade Organization Code of Practice² (ethical business and fair trade), World Economic Forum's Four Pillars and Consultation Draft on "Toward Common Metrics and Consistent Reporting of Sustainable Value Creation"³ (sustainable business) and Chab Dai Charter⁴ (anti-trafficking).

Next, invitations were extended to all Members of Freedom Business Alliance to participate in three online roundtable meetings to discuss which commitments Freedom Businesses should uphold in the conduct of their business and how they commit to care for their Personnel. The roundtable meetings were attended by leaders of Freedom Businesses of varying sizes that have operated over varying lengths of time in different industries and geographical regions.

The Stakeholders of Freedom Businesses were identified in the first roundtable meeting. These included Beneficiary Personnel, board members of Freedom Businesses, consumers, investors, and NGO partners. Stakeholders were engaged

¹ World Fair Trade Organization. (2020). *The WFTO Fair Trade Standard*. Retrieved from https://wfto.com/sites/default/files/WFTO_Standard_November%202020_digital.pdf

² World Fair Trade Organization. (1995). *WFTO Code of Practice*. Retrieved from <https://wfto.com/our-path-fair-trade/wfto-code-practice>

³ World Economic Forum. (2020). *Toward Common Metrics and Consistent Reporting of Sustainable Value Creation*. Retrieved from https://www3.weforum.org/docs/WEF_IBC_ESG_Metrics_Discussion_Paper.pdf

⁴ Chab Dai Coalition. (2011). *Chab Dai Charter*

through various methods, including surveys, focus groups and interviews. They were asked about what commitments were important to them in their consideration of, or relationship with, Freedom Business. The method of Stakeholder engagement varied depending on the particular Stakeholder group and other ethical considerations and best practices.

The draft Code of Excellence was circulated to all Members of Freedom Businesses, who were invited to provide input before a final draft was created. The final draft was submitted for approval to the Board of FBA prior to publication.

STRUCTURE

The Freedom Business Code of Excellence contains ongoing, actionable Commitments which Freedom Businesses agree to publicly endorse and implement in their businesses. Many of the Commitments apply to all forms of Freedom Businesses, while some Commitments apply to designated subgroups of Freedom Businesses. These subgroups are defined in the Application section, usually depending on the nature of their business. Some Commitments apply immediately, while others allow for compliance to be attained over a predetermined time frame. There are also Commitments which require Freedom Businesses to demonstrate continuous improvement over time. These varying standards are delineated under each Commitment.

Review and Updates: The first version of the Freedom Business Code of Excellence was published in November 2021. FBA desires for the Freedom Business Code of Excellence to reflect contemporary circumstances and best practices of Freedom Businesses. Accordingly, this document will be reviewed and updated periodically.

APPLICATION

WHO DOES THE CODE OF EXCELLENCE APPLY TO?

In general, the Freedom Business Code of Excellence applies to all categories of Freedom Business. These categories are described below and defined in the Definitions section of this Code of Excellence. There are some Commitments which apply only to those categories of Freedom Businesses which directly employ and/or provide vocational training to Beneficiary Personnel in their workplace.

The following subsections provide an introduction to the practice of Freedom Business and the distinction between a Freedom Business Enterprise, Freedom Business Champion, Freedom Business Initiative, and Freedom Business Startup, all of which uphold the Freedom Business Code of Excellence.

Freedom Business

Freedom Business **as a practice** exists to create employment opportunities for survivors of Human Trafficking and those At Risk, with intent and operations that uphold the Freedom Business Code of Excellence.

Freedom Business Enterprise

A Freedom Business Enterprise exists for the purpose of directly employing and/or providing vocational training for survivors of Human Trafficking and those At Risk. These organizations offer more than just a job, but a place of healing and growth, governed by the Freedom Business Code of Excellence.

These organizations form the core of the Freedom Business movement.

Where most businesses seek to hire the best and most qualified, a Freedom Business Enterprise seeks to hire those who are often underskilled and have experienced trauma and Human Trafficking. These individuals require extra support and services to cope with a work environment, heal, and succeed, both personally and professionally. The list of interventions and ethical considerations required to create positive impact in their lives has developed over time as these organizations, in cooperation with industry researchers, learn more about the process of healing and development in the workplace. But one thing is certain: the path of growth for a Freedom Business Enterprise is challenging and requires committed investment of resources to create transformed lives.

Freedom Business Champion

A Freedom Business Champion is an organization that supports, facilitates and extends the work of Freedom Business Enterprises, primarily in the area of generating market demand for their goods and services.

Freedom Business Champions play a vital role in job creation. While some Freedom Businesses are vertically integrated, many are not and require partnership with Freedom Business Champions to bring their products or services to market and generate sufficient revenue to grow and create more jobs. Freedom Business Champions do not employ Beneficiary Personnel unless otherwise indicated, but they are vital to the success and job creation efforts of those who do.

Freedom Business Initiative

A Freedom Business Initiative exists to create jobs for survivors of Human Trafficking and those At Risk. It is undertaken by an organization which exists for some other central purpose, but has elected to help end Human Trafficking through job creation as a part of its commitment to corporate social responsibility.



Freedom Business Initiatives are vital to scaling the number of jobs created for survivors and those At Risk and require support and investment from the parent organization to succeed. However, it is primarily the Freedom Business Initiative, rather than the entire organization that must uphold the Freedom Business Code of Excellence.

Freedom Business Startup

A Freedom Business Startup is a Freedom Business that has not started operations or has been in operation for less than 12 months.

Their inclusion is vital to the growth of Freedom Business globally and vital to their own growth. These organizations require guidance and support at this critical, early phase. Yet because operations are in the early stages, many of the Guidelines within the Code of Excellence will not fully apply. Therefore these early stage Freedom Businesses have been given their own designation.

DEFINITIONS

“At Risk”⁵

An individual is At Risk of Human Trafficking or exploitation when it can be verified that at least two (2) of the risk factors in the list below are present, AND there is evidence that they have a high proximity to Human Trafficking or exploitation.

Risk factors include:

- Economically Marginalized
- Irregular immigration status
- Discrimination based on gender, religion, or minority ethnic status
- Limited education
- No or limited knowledge of the local language
- Mental, behavioural or neurological disorders
- Child deprived of parental care
- Physical and/or learning disabilities
- Housing instability
- Debt bondage
- Trauma or abuse history
- National or regional conflict
- Lack of family or social support network
- Household factors such as domestic violence, substance abuse, family breakdown or instability, single parenthood
- Lack of, or limited, job opportunities or choices are available
- Drug use

⁵ This definition serves only as a guide for determining whether a person is “At Risk”. It is not intended to exclude individuals who are genuinely in need of employment, training and/or other support as a result of Human Trafficking.

- Currently employed in a job which may be viewed as being closely associated with prostitution or other work which can easily be exploitative
- High number of Adverse Childhood Experiences⁶

An individual is considered to have **"high proximity to Human Trafficking or exploitation"** if they:

- are living in a geographical region or community which is known to have high rates of Human Trafficking;
- have an intimate partner, family member or relative who is a trafficker; or
- have a family member, relative or close acquaintance who has been trafficked.

"Beneficiary Personnel"

Personnel who are employed and/or provided vocational training by a Freedom Business *and* they have personally experienced Human Trafficking or are At Risk.

"Economically Marginalized"⁷

People or communities who are restricted to the lower or peripheral edge of the economy, who are prevented from participation in mainstream economic activity by factors beyond their control.

"Personnel"

All those who have an employment relationship with an organization and/or are participating in vocational training provided by the organization.

The International Labour Organisation provides guidance on determining if an employment relationship exists between two parties.

⁶ Centers for Disease Control and Prevention (2021), *Adverse Childhood Experiences (ACEs)*. Retrieved from <https://www.cdc.gov/violenceprevention/aces/index.html>

⁷ Note 1 at 1.4 Definitions



This includes considering the specific circumstances of the relationship to assess if any of the indicators below, amongst others, are present:

- the worker performs the work in accordance with the instructions of, or under certain conditions requested by, another party (and for solely or mainly for the benefit of another person);
- the worker receives periodic remuneration which amounts to the worker's sole or principal source of income;
- the worker receives other payment in kind such as food, lodging or transport; and/or
- the worker does not bear the financial risk of the work that is undertaken.⁸

“Freedom Business”

Freedom Business exists to create employment opportunities for survivors of Human Trafficking and those At Risk, with intent and operations that uphold the Freedom Business Code of Excellence.

“Freedom Business Champion”

An organization that supports, facilitates and/or extends the work of Freedom Business Enterprises, primarily in the area of generating market demand for goods and services. These organizations uphold the Freedom Business Code of Excellence.

“Freedom Business Enterprise”

An organization that exists for the purpose of *directly* employing and/or providing vocational training to survivors of Human Trafficking and those At Risk. These organizations uphold the Freedom Business Code of Excellence.

“Freedom Business Initiative”

An initiative within an organization that exists to create jobs for survivors of Human Trafficking and those At Risk. It is undertaken by an organization which exists for some other central purpose, but has

⁸ International Labour Organisation. (2006). *R198 - Employment Relationship Recommendation, 2006 (No. 198)*. Retrieved from https://ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R198



elected to help end Human Trafficking through job creation as a part of its commitment to corporate social responsibility.

“Freedom Business Startup”

A Freedom Business that has not started operations or has been in operation for less than 12 months.

“Human Trafficking”⁹

The recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

“Exploitation” shall include, at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs;

The consent of a victim of Human Trafficking to the intended exploitation shall be irrelevant where any of the means above have been used;

The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “Human Trafficking” even if this does not involve any of the means specified above.

“Child” shall mean any person under eighteen years of age.

“Local Living Wage”¹⁰

Minimum income required for an individual to meet an adequate standard of living for the individual and their family in their country. In

⁹ United Nations. (2000). *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime*. Retrieved from <https://www.refworld.org/docid/4720706co.html> at Article 3

¹⁰ Note 1 at 1.4 Definitions



considering what amounts to an adequate standard of living, the individual should be able to afford adequate shelter, food, water and other necessities such as education, health care, transport, clothing, etc. so that the individual does not fall into poverty.

“Stakeholder”

Any person or entity that has an interest or concern in an organization and can either affect or be affected by actions of that organization.



COMMITMENTS OF FREEDOM BUSINESSES



Mission to End Human Trafficking

COMMITMENT 1:

Creating jobs for survivors of Human Trafficking and those At Risk is a central, stated aim of the organization. It has developed structures, processes, programs, and resources to accomplish plans of action to carry out this mission.¹¹

APPLICATION & GUIDANCE:

1.1 **Mission:** The organization's incorporation documents confirm that its core mission is to help end Human Trafficking through job creation for survivors and those At Risk. Where legal or other legitimate barriers do not allow for this to be stated in the incorporation documents, the organization has other similar supporting evidence to demonstrate this.¹²

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

1.2 **Plan of Action:** The organization has a plan of action to create jobs and training in a healing-centered workplace for individuals who have experienced Human Trafficking or are At Risk.¹³

¹¹ Note 1 at Principle 1

¹² Ibid.

¹³ Ibid.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

1.3 **Percentage of Beneficiary Personnel:** At least 20% of the Personnel of the Freedom Business Enterprise or Freedom Business Initiative are Beneficiary Personnel. The organization strives to improve the lives of Beneficiary Personnel and to support them in their recovery, as evidenced by its policies, procedures and practices.

Mandatory *Freedom Business Enterprises and Freedom Business Initiatives*

1.4 **Freedom Business Champions:** At least 20% of the products and/or services marketed by a Freedom Business Champion are produced by Freedom Business Enterprises or Freedom Business Initiatives.

Mandatory *Freedom Business Champions*

Governance, Transparency & Accountability

COMMITMENT 2:

The organization has a governance structure that oversees its strategic direction toward achieving its mission, identification and management of risks and opportunities, and its financial and social performance.¹⁴ There is transparency in how it conducts trade, in its supply chain and in management of the organization.¹⁵ The organization welcomes and seeks accountability from its Stakeholders. It fosters meaningful participation of Personnel to facilitate fulfillment of its mission.¹⁶ It commits to ongoing learning and development as an organization to raise the standard of practice in the Freedom Business Movement together with other Freedom Businesses.¹⁷

APPLICATION & GUIDANCE:

2.1 **Legal Registration.** The organization holds all applicable legal registrations with the relevant local governmental authorities. It abides by the requirements of local law and implements best practices and procedures accordingly.¹⁸

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

¹⁴ Note 3 at Pillar 1

¹⁵ Note 1 at Principle 2

¹⁶ Note 4 at Principle 12

¹⁷ Note 4 at Transparency Principles

¹⁸ Ibid.

2.2 **Organizational and Governance Structure:** The organization has a defined and functional organizational and governance structure (including a defined leadership team and board), and a credible accounting system.¹⁹

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

2.3 **Integrity and Ethical Conduct:** The organization conforms with norms for ethical corporate behaviour. It actively seeks to operate in a trustworthy way with a variety of Stakeholders.²⁰ It has policies and training addressing anti-corruption practices, reporting concerns about unethical or unlawful behaviour, and organizational integrity, and mechanisms to seek internal or external advice on these issues.²¹

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

2.4 **Grievance Procedures:** The organization acknowledges the (perceived or real) imbalance of power between the organization and its Personnel (in particular, Beneficiary Personnel). It has a grievance procedure which is sensitive to this possible dynamic that seeks to engage honest and candid feedback from Personnel, without impacting their job security.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

2.5 **Communication and Feedback:** The organization has an effective process of internal communication with its Personnel as well as with its key Stakeholders. It collects and considers feedback from these key Stakeholders at least every 2 years when establishing plans for growth and improvement.²²

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

¹⁹ Note 1 at Principle 2.1

²⁰ Note 3 at Pillar 1

²¹ Ibid.

²² Note 1 at Principle 2.3

2.6 **Participatory Decision-Making:** The organization has an organizational structure and appropriate participatory procedures that foster and encourage participation by staff at all levels in order to facilitate the fulfilment of the organization's goals, mission and its decision-making.²³

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

2.7 **Measure to Outcomes and Disclosure of Impact.** The organization sets and reviews measurable and timed outcomes annually, and regularly evaluates and measures its programs.²⁴ It discloses information on Personnel matters and on the potential and actual impacts of their operations to Stakeholders so as to demonstrate the long-term value that it creates through the personal and professional development of its Personnel.²⁵

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

2.8 **Transparency.** The organization provides, or makes available, transparent and credible information on how it conducts its business operations (including on matters such as its governance and supply chains) to its Stakeholders and the public.²⁶

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

²³ Note 1 at Principle 2.4; Note 4 at Principle 12

²⁴ Note 4 at Principle 14

²⁵ Note 3 at Pillar 3

²⁶ Note 1 at Principle 2.2

Good Working Conditions

COMMITMENT 3:

The organization commits to protecting the safety, human rights, health as well as the mental, physical, social and spiritual well-being of its Personnel.²⁷ It conforms, at a minimum, with all relevant laws on health and safety for its Personnel, working hours and working conditions.²⁸

APPLICATION & GUIDANCE:

3.1 **Safe Conditions:** The organization provides safe working conditions to its Personnel, ensuring measures such as safe buildings, safe transport and equipment to carry out work duties, and other work procedures to promote the health and safety of its Personnel depending on the nature and requirements of the job.²⁹

Mandatory by Year 2 *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

3.2 **Health and Safety Training:** The organization trains its Personnel in health and safety in the workplace.³⁰

Mandatory by Year 2 *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

²⁷ Note 3 at Pillar 3

²⁸ Ibid.; Note 1 at Principle 7

²⁹ Ibid.

³⁰ Note 1 at Principle 7.2

3.3 **Identifying and Monitoring Health and Safety Issues:** The organization actively monitors the health and safety risks in its operations, It seeks and values feedback from its Personnel in identifying such risks. It has procedures in place to log and analyze workplace accidents or other medical issues arising out of their work. It takes action to address the issues once identified.³¹

Mandatory by Year 2 *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

3.4 **Working Hours:** The organization records working hours of its Personnel and conforms with all applicable laws with regard to working hours, overtime, maternity/paternity leave, statutory holidays and annual leave.³²

Mandatory by Year 2 *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

3.5 **Inclusiveness; Equitable opportunities:** Subject to applicable laws and taking into account the best interests of its Personnel as a whole, the organization commits to being inclusive in providing equitable opportunities to its Personnel and does not discriminate in recruitment, remuneration, access to training, promotion, termination or retirement based on gender, race, age, ethnicity, religion, disability or other health issues, sexual orientation and political affiliation where all Personnel feel valued and respected and receive fair compensation and benefits.³³

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

3.6 **Safeguarding policies:** The organization has training, policies and guidelines that respect and prioritise the interests of its Personnel in areas of business operations where their interests may be affected, such as confidentiality, visitors to the organization, marketing and/or communications.

³¹ Note 1 at Principles 7.1 and 7.2

³² Note 1 at Principle 7.5

³³ Note 3 at Pillar 3

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

3.7 **Ethical storytelling and marketing:** When sharing about its social impact and other social issues in marketing, social media and communications, the organization shares in a way that is dignifying, truthful and educational, and never sensationalised.³⁴

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

³⁴ Ethical Storytelling. (n.d.). *Ethical Storytelling Pledge*. Retrieved from <https://www.ethicalstorytelling.com/pledge>



Fair Pay

COMMITMENT 4:

The organization commits to paying an equitable and fair wage to all its Personnel which meets the legal minimum wage and strives toward the Local Living Wage. It provides social security and benefits, not counting the provision of any extra programs and services toward minimum wage requirements.

APPLICATION & GUIDANCE:

4.1 **Local Minimum Wage:** The organization complies with all applicable laws in paying its Personnel the required minimum wage. The expense of extra programs and services is not counted toward the provision of minimum wage.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

4.2 **Local Living Wage:** The organization undertakes enquiries and research to collect relevant information in determining the Local Living Wage.³⁵ It provides such information to its Personnel so that they are sufficiently informed in negotiating a mutually agreed, equitable wage.³⁶ The organization strives to pay the Local Living Wage to its Personnel.³⁷

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

³⁵ Note 1 at Principle 4.1

³⁶ Note 1 at Principle 4.5

³⁷ Note 1 at Principle 4.7; Note 3 at Pillar 3

4.3 **Minimum Social Security:** The organization provides its Personnel with all legally required social benefits (e.g. retirement contributions, sick leave, basic social security, health care contributions, as applicable).³⁸

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

4.4 **Additional Social Security:** The organization strives to provide additional social security and benefits to its Personnel, above legal obligations, in particular health insurance/medical support, retirement schemes, social security in case of disability or death of the income earner, sick leave.³⁹

Continuous improvement *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

4.5 **Paying Personnel:** The organization makes payments to its Personnel at scheduled intervals, according to legal requirements, and documented on payslips.⁴⁰

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

³⁸ Note 1 at Principle 7.6

³⁹ Note 1 at Principle 7.7

⁴⁰ Note 1 at Principle 7.8

Healing-Centered Workplace

COMMITMENT 5:

The organization has a trauma-informed, healing-centered workplace demonstrated by fully integrating knowledge about trauma and recovery practices into its policies, procedures, and practices, seeking to actively reduce the possibility of re-traumatization of Beneficiary Personnel.⁴¹

APPLICATION & GUIDANCE:

5.1 **Trauma-Informed Training:** Personnel at all levels in the organization receive trauma-informed care training, adapted and commensurate with their role within the organization, where appropriate. All new Personnel will undertake the training soon after commencing employment and/or vocational training at the organization. Scheduled refresher courses are provided.

Mandatory *Freedom Business Enterprises and Freedom Business Initiatives*

5.2 **Trauma-Informed Policies, Procedures, and Practices:** The organization's policies, procedures, and practices are trauma-informed and promote safety and holistic well-being of its Personnel. Personnel are informed and trained in such policies and procedures, and scheduled refresher courses are provided.

Mandatory *Freedom Business Enterprises and Freedom Business Initiatives*

5.3 **Growth and Development of Personnel:** The organization prioritizes the personal and professional development of all its Personnel. It commits to creating an

⁴¹ Substance Abuse and Mental Health Services Administration. (2014). *SAMHSA's Concept of trauma and guidance for a trauma-informed approach*. Retrieved from <https://store.samhsa.gov/system/les/sma14-4884.pdf> at p.9



environment where creativity, innovation, excellence, and learning from mistakes are encouraged and rewarded.⁴² It has systems and dedicated staff to support Beneficiary Personnel to be resilient, to grow and reach their potential. It is intentional in exploring career pathways of Beneficiary Personnel, both within the organization and also in employment opportunities outside the organization.

Continuous improvement *Freedom Business Enterprises and Freedom Business Initiatives*

5.4 **Safe Environment:** The organization creates and sustains opportunities for choice, decision-making, power and control of Personnel toward their growth and development in the workplace. It seeks to provide a safe physical and emotional environment for its Personnel that fosters and promotes healing in-community.

Continuous improvement *Freedom Business Enterprises and Freedom Business Initiatives*

5.5 **Services for Mental, Emotional and Spiritual Well-Being:** The organization raises awareness amongst its Personnel on the importance of mental, emotional and spiritual well-being. It provides Beneficiary Personnel with access to professional counseling and/or other recovery services (either internally or externally through partnerships), where necessary.

Mandatory *Freedom Business Enterprises and Freedom Business Initiatives*

5.6 **Other Services for Holistic Well-Being:** The organization strives to provide Beneficiary Personnel with access to services (either internally or externally through partnerships), where necessary, toward holistic well-being for Beneficiary Personnel and their families. These may include support and resources for life skills, education, job readiness and family counseling.

Continuous improvement *Freedom Business Enterprises and Freedom Business Initiatives*

⁴² Note 4 at Principle 11



5.7 **Support for Supervisors and Managers of Beneficiary Personnel:** The organization acknowledges the integral role that managers and supervisors of Beneficiary Personnel have in supporting Beneficiary Personnel in their learning and development in furtherance of the organization's mission. The organization has policies, procedures, and practices that support the holistic well-being of such managers and supervisors so that they can also continue to grow and thrive as they support the Beneficiary Personnel.

Continuous improvement *Freedom Business Enterprises and Freedom Business Initiatives*



Concern for External Stakeholders

COMMITMENT 6:

The organization commits to business practices that evidence concern for external Stakeholders including suppliers, business partners, donors, investors, fellow Freedom Businesses, and the environment, always seeking to minimize negative impacts created by its operations and increase mutual benefit.

APPLICATION & GUIDANCE:

6.1 **No Child Labor, Forced Labor, or Human Trafficking in Supply Chains:** The organization strives to eliminate child labor, forced labor and Human Trafficking in its business and in its supply chain. Child labor refers to the employment of children under the age of 15 years (or under the age stipulated in local law, whichever is higher). Where local law allows for the employment of children under the age of 15 years, the organization must monitor and ensure that the work is not hazardous and will not interfere with the child's education, or cause harm to the child's health, or physical, mental, spiritual, moral or social development.⁴³

Mandatory Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups

6.2 **Collaboration and Sharing:** The organization commits to collaborate with other Members of Freedom Business Alliance and Stakeholders in the spirit of

⁴³ United Nations. (1990). *Convention on the Rights of the Child*. Retrieved from <https://www.refworld.org/docid/3b00f03d30.html> at Article 32

partnership and cultivating trust and respect in pursuit of the goal for greater collective impact against Human Trafficking.⁴⁴ It seeks to share knowledge and resources within the Freedom Business movement to raise the standard of practice.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

6.3 **Fair Competition:** The organization works cooperatively with the other Freedom Businesses and avoids unfair competition. It avoids duplicating the designs or patterns of other organizations without permission.⁴⁵

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

6.4 **Responsible Communication of Impact:** The organization only claims impact it creates directly, never claiming work completed or impact created by partner organizations, unless agreed upon in writing by the partnering organizations. In the case of Freedom Business Enterprises, if the organization funds Personnel development carried out by another organization, this relationship is clearly communicated. In the case of Freedom Business Champions, if the organization generates market demand for goods and services for a Freedom Business Enterprise that leads to job creation, this is clearly communicated, and claims of directly employing or providing vocational training to Beneficiary Personnel are avoided.

Responsible communication of impact respects the various roles required to make Freedom Business successful, protects external Stakeholders who help fund the work, and allows each collaborating organization to seek the support necessary to succeed.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

⁴⁴ Note 4 at Principles 5, 6 and 7

⁴⁵ Note 1 at Principle 3



6.5 **Concern for the Environment:** The organization demonstrates a good understanding of, and response to, the environmental impacts of its operations. It strives to be environmentally friendly in its operations and in the trade of its products and/or services. It strives to manage resources sustainably and to protect the environment.⁴⁶

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives and Freedom Business Startups*

6.6 **Honoring Commitments to Trading Partners:** The organization is responsible, fair and professional in meeting its commitments (including payment) in a timely manner and to the agreed quality and specifications (if applicable).⁴⁷ The organization maintains effective and timely communication with its trading partners.

Mandatory *Freedom Business Enterprises, Freedom Business Champions, Freedom Business Initiatives, Freedom Business Startups*

⁴⁶ Note 2 at Practice 7

⁴⁷ Note 1 at Principle 3.2



IMPLEMENTATION & COMPLIANCE

In September 2021, leaders from a number of Freedom Businesses gathered in a roundtable to provide input on the development of an implementation and compliance process for the Freedom Business Code of Excellence. Participants indicated a desire for FBA certification to result when an organization demonstrates compliance with the Freedom Business Code of Excellence. A certification process would involve FBA reviewing the documents, structures and systems of a Freedom Business to certify that the Freedom Business complies with the Commitments & Guidelines of this Code. Based on feedback from our Members and internal strategic plans, FBA will embark on a two-phase approach toward implementation and certification.

PHASE 1: AFFIRMATION OF INTENT TO IMPLEMENT

Phase 1 will begin upon publishing of this Code of Excellence Version 1.0. FBA will ask all Members to affirm their support of the Freedom Business Code of Excellence and their intention to implement the Commitments in their organization by reviewing this Code and signing the Affirmation of Intent to Implement (See the Appendix).

PHASE 2: CERTIFICATION BY INDEPENDENT REVIEW

In 2022, FBA will continue to facilitate roundtable discussions with FBA Members to co-create the Implementation & Compliance provisions of the Freedom Business Code of Excellence Version 2.0. Once this process is finalized, Version 2.0 will be published by the end of 2022. It is envisaged that in 2023, FBA will begin undertaking an annual independent review of those Freedom Businesses who elect to participate in FBA Certification.

APPENDIX

Sample Form

AFFIRMATION OF INTENTION TO IMPLEMENT THE FREEDOM BUSINESS CODE OF EXCELLENCE

Date:
Name of FBA Member:
Freedom Business Classification⁴⁸:
Authorized Representative⁴⁹:
Name:
Title:
Email:

I am duly authorized to represent [*Name of FBA Member*]. I have reviewed the Freedom Business Code of Excellence Version 1.0 (the "Code") and hereby affirm our organization's intent to implement the Commitments & Guidelines contained in the Code.

I agree to have our organization's name and logo displayed on FBA's website to inform the public of our organization's status as a Member of FBA and our affirmation of intention to implement the Code.⁵⁰

Name:
Title:
Organization:

⁴⁸ As per designation by FBA: *Freedom Business Enterprise, Freedom Business Champion, Freedom Business Initiative, or Freedom Business Startup*

⁴⁹ The individual signing this Affirmation of Intention to Implement should be duly authorized by the organization's governing body to represent the organization

⁵⁰ Please contact impact@freedombusinessalliance.com if you have any concerns or would like further details



REFERENCES

BAM Global and BAM Resource Team. (n.d.). *Business as Mission*. Retrieved from <http://www.businessasmission.com/>

Centers for Disease Control and Prevention (2021), *Adverse Childhood Experiences (ACEs)*. Retrieved from <https://www.cdc.gov/violenceprevention/aces/index.html>

Chab Dai Coalition Cambodia. (2011). *Chab Dai Charter*

Ethical Storytelling. (n.d.). *Ethical Storytelling Pledge*. Retrieved from <https://www.ethicalstorytelling.com/pledge/>

International Labour Organisation. (2006). *R198 - Employment Relationship Recommendation, 2006 (No. 198)*. Retrieved from https://ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R198

Substance Abuse and Mental Health Services Administration. (2014). *SAMHSA's Concept of trauma and guidance for a trauma-informed approach*. Retrieved from <https://store.samhsa.gov/system/files/sma14-4884.pdf>

United Nations. (1990). *Convention on the Rights of the Child*. Retrieved from <https://www.refworld.org/docid/3b00f03d30.html>

United Nations. (2000). *Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime*. Retrieved from <https://www.refworld.org/docid/4720706c0.html>

World Economic Forum. (2020). *Toward Common Metrics and Consistent Reporting of Sustainable Value Creation*. Retrieved from https://www3.weforum.org/docs/WEF_IBC_ESG_Metrics_Discussion_Paper.pdf

World Fair Trade Organization. (1995). *WFTO Code of Practice*. Retrieved from <https://wfto.com/our-path-fair-trade/wfto-code-practice>

World Fair Trade Organization. (2020). *The WFTO Fair Trade Standard*. Retrieved from https://wfto.com/sites/default/files/WFTO_Standard_November%202020_digital.pdf



CONTACT

FREEDOM BUSINESS ALLIANCE

Address: 10685-B Hazelhurst Dr #19034, Houston, TX 77043-3238

Phone: +1 832 786 1049

Website: www.freedombusinessalliance.com

General queries: info@freedombusinessalliance.com

Queries relating to the Freedom Business Code of Excellence or FBA Membership:
impact@freedombusinessalliance.com

Suggested citation:

Freedom Business Alliance. (2021). *Freedom Business Code of Excellence*. Retrieved from <https://www.freedombusinessalliance.com/code-of-excellence>

© Copyright 2021 Freedom Business Alliance - All Rights Reserved

