

KFHI Safeguarding Policy for Protecting Children and Vulnerable Groups

Enacted: April 2022

Revised: April 2023

Chapter 1. General Provisions

Article 1 (Purpose)

1. The purpose of the Safeguarding policy for Children and Vulnerable Groups (hereinafter "policy") is to establish standards for Korea Food for the Hungry International (*corporation*), Korea Food for the Hungry International (*social welfare corporation*), and Sharing Happiness (*foundation*) (hereinafter collectively "KFHI"), with regard to the safeguarding of children and vulnerable groups.

2. This policy outlines an approach to prevent harm for all beneficiaries, including children and vulnerable groups, participating in KFHI projects, and to effectively respond to problems. The range of harm includes:

- ① Harm caused by the acts of KFHI's executives, employees and related parties.
- ② Harm caused by all activities related to KFHI (projects, fundraising, operation, etc.).

Article 2 (Applicable Persons)

1. This policy applies to KFHI's executives, employees, and related parties in all countries where KFHI services are provided. It is applicable at all times, including business and non-business hours.

- ① (Executives and employees) This refers to the executives and to all individuals who have an employment contract with KFHI.
- ② (Related parties) This refers to all entities which participate in the service delivery process for beneficiaries or handle their personal information through KFHI. This includes individuals and organizations in cooperative and/or contractual relationships, such as KFHI HC field offices, affiliated organizations (such as Happy Home School and contracted-out facilities), partner organizations, KFHI ambassadors, advisors, interns, volunteers, and all persons involved in the service delivery of KFHI (hereinafter referred to as the "related parties").

Article 3 (Applicable Activities)

1. This policy applies to all activities carried out by KFHI, either independently or in collaboration with related parties through contracts, including projects, fundraising, and operations.

2. "All activities" refer to KFHI's strategy establishment, budgeting, recruitment, surveys, project operation and management, procurement and purchasing, partner contracts, organizational operation, evaluation, research, public relations, fundraising, use of communication media, among others.

Article 4 (Considerations by Country)

1. All KFHI overseas offices¹ shall adopt this policy as is or adapt it to the context of the country of

¹ "KFHI overseas offices" refer to all offices where there are project personnel (executives, employees and KFHI

operation as necessary.

2. Any revision of this policy for contextualization shall be carried out in consultation with the Safeguarding Oversight Department) to ensure consistency with the standards of this policy. This policy must comply with the laws of the respective country. When there are different standards between this policy and local laws, the standards that provide greater protection to beneficiaries shall be applied.

3. Korea Food for the Hungry International (*social welfare corporation*) shall comply with this policy. However, compliance with the Social Welfare Act (the applicable law for KFHI's national projects) shall take priority over this policy.

Article 5 (Basic Principles)

1. KFHI considers all individuals as beings created in the image of God and values their inherent worth in ways that honor God.

2. As a fundamental principle, KFHI is committed to doing no harm to beneficiaries in all its activities. KFHI strictly prohibits all forms of harm against beneficiaries, including but not limited to sexual abuse and exploitation, and will never tolerate such acts under any circumstances by its executives, employees, and related parties.

3. KFHI is committed to providing a safe environment for all beneficiaries, including children.

4. KFHI does not abuse its power over beneficiaries, protects personal information, and respects their rights. When taking or using photos or videos of beneficiaries, KFHI complies with media guidelines to respect their dignity and human rights.

5. KFHI takes precaution to prevent all forms of abuse and exploitation of beneficiaries. Systems shall be established for reporting of and responding to related cases.

6. KFHI takes prompt action in cases of safeguarding issues, taking into consideration the special vulnerability of beneficiaries and minimizing any potential harm.

Chapter 2. Definition of Key Terms

Article 6 (Definition of Terms)

1. (Safeguarding)

① This term refers to the process of protecting all beneficiaries from abuse or exploitation, preventing any hinderance to their health and development, and ensuring their safety.

② To prevent harm to beneficiaries in all activities carried out by KFHI, this term includes the operation of institutional measures and systems at the organizational level to prevent and respond to safeguarding issues.

volunteers) who conduct projects on behalf of KFHI. In countries with KFHI country offices, the country office acts as a representative of all field offices in that respective country.

2. (Child) A child is defined as an individual under the age of 18, regardless of the definition of adulthood in the respective countries. However, if a country defines adulthood as individuals older than 18 years of age, the definition of a child shall be an individual under that age.

3. (Vulnerable groups) This term refers to children and adults who are unable to protect themselves from harm or exploitation, or those who are deemed at risk for any reason including, but not limited to, gender, physical disability, mental disability, ethnicity, nationality, religion, economic status, social status and/or the occurrence of disaster or conflict.

4. (Beneficiary) This term refers to all persons who receive goods and services from KFHI activities, participate in KFHI activities, or utilize services provided by KFHI.

5. (Abuse) Abuse is any act that inflicts physical or emotional harm and can be categorized as follows:

① (Physical abuse) This includes any act that causes or has the potential to cause physical harm to a child, such as hitting, beating, shaking or throwing a child.

② (Emotional abuse) This refers to any behavior that causes emotional or psychological harm to a child, such as belittling, humiliating, threatening, or confining them, or isolating them from others.

③ (Neglect) This includes failing to provide children with basic needs, such as food, shelter, clothing, basic education and medical care, or failing to provide them with adequate supervision or care, potentially placing them in dangerous situations or environments.

④ (Sexual abuse) This refers to any sexually infringing or threatening behavior under forced, coercive or unequal conditions. It includes all forms of sexual violence, coercion, inappropriate contact or exposure, including incest, early marriage, forced marriage, rape, participation in or exposure to obscene images/videos (pornography), sex slavery/human trafficking, and contactless molestation, including explicit sexual language toward children, and grooming.

6. (Exploitation) This refers to the abuse or attempted abuse of another person's vulnerability, power difference, or position of trust for personal gain. It falls into the following categories.

① (Exploitation) This refers to the use of one's position, power, privilege, or wealth to involve children in labor, domestic labor, forced crimes (such as pickpocketing, gang involvement, begging, transporting and manufacturing drugs, fraud, etc.), or military service (such as juvenile soldiers, etc.), through seduction, mediation, coercion, or deception.

② (Sexual Exploitation) This refers to all sexual behavior performed by adults on children for the purpose of satisfying their own desires. It includes inflicting or attempting abuse for sexual purposes using unequal positions and power relationships with beneficiaries, and obtaining financial, social, or political benefits.

7. (Personal Information) This refers to information that can be used to identify an individual, such as the real name, photo, address, etc. It also includes information that, in combination with other

information, can be used to identify a specific person, even if the information alone may not be enough to so.

Chapter 3. Code of Conduct

Article 7 (Code of Conduct)

1. KFHI should inform beneficiaries of their right not to be abused or exploited during the project and educate them on how to recognize inappropriate behavior by executives, employees, and related parties. It should also provide guidance on the safeguarding reporting system and the process for reporting any incidents.
2. All project procedures and decision-making of KFHI should prioritize the safety of beneficiaries. When planning a new project, project personnel should identify potential risk factors that may violate the safeguarding policy and develop a risk management plan. The safeguarding checklist can be used to diagnose potential risks.
3. When making decisions that affect beneficiaries, KFHI should provide sufficient information accessible to all parties involved, including parents or legal representatives in the case of a child.
4. Prior to taking photos, videos, or any form of media involving beneficiaries, KFHI should obtain informed consent from the person concerned or the child's parent or legal representative. If written consent is not possible, oral consent should be recorded.
5. Before a site visit, the officer of the department in charge should train all site visitors on the safeguarding policy. The policy should be distributed to visitors, and they must sign a written consent form acknowledging that they have read and understood the policy. The written consent form should be digitized and stored in a designated location.
6. KFHI should ensure that all beneficiaries, regardless of their background, can participate in the organization's activities. No specific beneficiary or their family should be intentionally excluded or favored from the organization's activities.
7. KFHI employees and related parties should act in a way that does not insult or disrespect the beneficiaries through their attitudes, language, and facial expressions.
8. Beneficiaries should have opportunities to participate in the monitoring and evaluation processes, and KFHI should reflect on their feedback during the risk factor diagnosis.
9. KFHI must obtain prior written consent from the person concerned or their parent or legal representative for the collection and use of personal information of beneficiaries. The collection and use of personal information should be kept to the minimum necessary, and the information should be discarded after the agreed-upon period of use. If damage occurs due to the use of personal information or if requested by the party, KFHI should stop using and disclosing the personal information.

Article 8 (Prohibited Acts)

1. It is prohibited to abuse or exploit beneficiaries, including all forms of violence such as sexual abuse, exploitation, harassment, verbal abuse, inappropriate touching and contacting, human trafficking, and child labor. It also includes the abuse or exploitation of third parties related to the

beneficiary.

2. Sexual intercourse or any sexual activity with beneficiaries, whether or not they consent, is strictly prohibited.
3. Creation of an environment or situation that may lead to the suspicious or inappropriate relationships or behaviors with any beneficiaries, including children is prohibited. Avoid spending time alone with a beneficiary in an enclosed space. In principle, all activities that involve children shall be managed by two or more adults at all times. Under no circumstances shall children be left alone with executives, employees, or related parties.
4. Smoking, drinking alcohol, possessing or using hallucinogenic drugs in the same space with children is prohibited. Any act prohibited for children by local customs and law shall be upheld.
5. Giving of harmful gifts, such as medicines without a doctor's prescription, alcohol, tobacco, etc., to beneficiaries is prohibited.
6. Corporal punishment against children, even for the purpose of discipline, is strictly prohibited.
7. Communication with beneficiaries about the matters prohibited by the safeguarding policy through personal SNS, messengers, etc. is prohibited.
8. Home visits, etc., that are not permitted by the beneficiary shall not be allowed. Internal procedures must be followed when requesting personal meetings. In the case of a personal meeting request, visits may be refused during the preliminary consultation process to protect the beneficiary. If the visit proceeds, a KFHI employee must accompany the person requesting the meeting.
9. The use of personal information of beneficiaries for non-agreed purposes or that may be used to identify them is prohibited. In particular, GPS information settings must be checked when taking pictures and images of beneficiaries, so that their location is not automatically recorded. It is also prohibited to use beneficiaries' personal information for commercial or personal purposes, such as posting their information on personal social media accounts.
10. Precaution is needed to not take photos or videos that expose specific body parts. Any photos or videos taken with exposed specific body parts must be discarded upon discovery.
11. Situations of the beneficiary must not be distorted, including for reasons such as fundraising or project performance. Beneficiaries shall not be made to tell distorted facts or make false testimonies about stories that are not theirs during interviews.

Chapter 4. Roles and Responsibilities

Article 9 (Executives, Employees, and Related Parties)

1. All KFHI executives, employees, and related parties have a responsibility to report any cases or suspected cases of safeguarding violations.
2. Failure to report a case related to safeguarding violations will be considered a violation of KFHI's safeguarding policy. In the case of KFHI's executives and employees, it may result in disciplinary action, and in the case of related parties, it may result in termination of the relationship (dismissal, contract termination, etc.).

Article 10 (Safeguarding Focal Points)

1. KFHI's Safeguarding Focal Points are responsible for ensuring that this policy is integrated into the culture and operations of their respective departments, and for supporting continuous improvement in the adoption and implementation of the policy. This includes receiving and internally reporting safeguarding violations, providing support to victims, conducting investigations, establishing an appropriate reporting system, and identifying safeguarding risks.

2. Safeguarding Focal Points are assigned to KFHI's headquarters and country offices.

① The headquarters shall designate one Safeguarding Focal Point for each department (headquarters or division unit) annually, and this designation shall continue as long as the department's responsibilities are maintained. This includes departments responsible for human resources (recruitment and management, education/training), digital and communications, national projects, international projects, beneficiary and sponsor data management, organization-wide strategy and planning, fundraising, and sponsor management.

② (International projects) Each KFHI office shall designate one person in charge to carry out safeguarding duties. The country office's Safeguarding Focal Point shall assist this person in the administration (translation, on-site contextualization) and implementation (recruitment, projects, reporting and response) of the office's safeguarding policy. In the case of countries without a country office, the Safeguarding Focal Point in the department in charge of international projects at the headquarters shall provide training to the related parties, and the reporting system shall follow the KFHI safeguarding reporting system (protect@kfhi.or.kr).

③ (National projects) The role of Safeguarding Focal Points related to contracted-out/directly operated welfare institutions shall be performed by those in the department in charge of national projects.

3. Safeguarding Focal Points shall document the investigation results of all cases and charges (allegations) in order to provide necessary information for decision-making regarding violation cases and shall keep victim-related information collected during the investigation confidential.

4. Safeguarding Focal Points shall protect the victim and conduct investigations in accordance with 'Chapter 6: Reporting and Response' and shall link appropriate professional assistance (such as consultation, medical assistance, legal advice, etc.) as instructed by the Safeguarding Oversight Department.

Article 11 (Safeguarding Oversight Department)

1. The Safeguarding Oversight Department, overseen by the Strategic Planning Department, is a working-level team responsible for implementing the safeguarding policy, and it shall plan and implement organization-wide activities to protect beneficiaries and prevent and respond to safeguarding violations. The head of the Safeguarding Oversight Department also serves as the Safeguarding Lead. The Safeguarding Lead shall supervise the initial response, protection, and support of victims, as well as the performance of case investigations. The Safeguarding Lead is also

responsible for follow-up measures and reporting the results after the case is closed.

2. The Safeguarding Oversight Department shall establish an annual plan for activities to raise awareness of the protection of beneficiaries. It shall provide training and resources for Safeguarding Focal Points to foster an organizational culture and environment that prioritize the protection of beneficiaries in each department.

3. The Safeguarding Oversight Department shall establish a training system and develop training materials for all executives, employees, and external parties regarding this policy. Regular training sessions shall be conducted through the Safeguarding Focal Point or acting officer to ensure proper dissemination of the policy.

4. In the event of a safeguarding violation, the Safeguarding Oversight Department shall support the Safeguarding Focal Points' investigation of the case and conduct the investigation according to the severity of the matter. After taking preemptive measures to protect victims upon receiving the case, the Safeguarding Lead shall report the results of the investigation to the president for decision-making. External experts may be involved in the investigation process if deemed necessary.

5. The Safeguarding Oversight Department shall transfer follow-up actions to relevant departments and committees (e.g. HR committee) as per decisions made and provide resources to Safeguarding Focal Points for implementing the decisions. Information regarding the process of receiving, investigating, and responding to case shall be documented and kept confidential, managed as a department secret.

6. The Safeguarding Oversight Department shall conduct regular monitoring to ensure the faithful implementation of this policy throughout KFHI's organizational operation and projects implementations.

7. The Safeguarding Oversight Department shall review and revise the policy as needed when blind spots in policy implementation are identified or when there are changes to relevant domestic and foreign regulations.

Article 12 (Role of Managers)

1. All KFHI managers, including team leaders, division heads, corresponding officers, and country office directors, are responsible for raising awareness of this policy among their subordinates. They are also specifically responsible for creating and supporting a safe work environment, and ensuring that all employees working on behalf of beneficiaries and KFHI are well-informed about the procedures for reporting safeguarding cases, as well as KFHI's responses and actions.

2. Managers shall have overall responsibility for identifying employees who work with beneficiaries and ensuring that they receive appropriate training for the protection of beneficiaries, based on the level of safeguarding risk associated with their job.

3. Managers should prioritize raising awareness of the protection of beneficiaries among themselves and their teams (including volunteers), contractors, cooperating partners, and communities participating in KFHI's programs. They should also include the budget for such activities in project

plans.

Chapter 5. Awareness and Prevention

Article 13 (Recruitment of Executives and Employees)

1. KFHI will take all possible measures to identify and avoid hiring individuals with the intention to harm children or vulnerable groups, or who have a history of harming children and vulnerable groups. In principle, KFHI shall not hire applicants who have committed sex related crimes. This applies not only to employees who directly deal with beneficiaries or handle personal information, but also to all other executives and employees.
2. During the hiring process of all executives and employees of KFHI, HR personnel must conduct a criminal record check (or request data for a criminal record check) within the scope permitted by the law of the country where each project site is located. If the law of the country does not allow for this, applicants must submit a written confirmation of their criminal record. A criminal record check may be conducted after hiring, if necessary.
3. Prior to starting work and activities in KFHI, all executives, employees, and related parties must receive sufficient guidance on this policy and provide written acknowledgement of their understanding and compliance with it.

Article 14 (Contracting with Related Parties)

1. KFHI shall take necessary measures to ensure that all related parties as defined in Article 2.1.2 do not harm the beneficiaries.
2. When establishing a cooperative relationship or signing a contract with an individual or organization that directly interacts with beneficiaries or handles their personal information, the person responsible for the contracting shall include a safeguarding compliance clause in the contract and obtain a signature on the safeguarding compliance agreement. This requirement applies to all cooperative and contractual relationships with entities such as Hope Corps (HC), public relations ambassadors, affiliated organizations including contracted-out facilities, and media personnel.
3. All individuals who have direct interaction with beneficiaries or access to their personal information shall provide a written confirmation of having no criminal record. This written confirmation must be filled out and submitted.

Article 15 (Education and Training)

1. KFHI shall provide safeguarding policy training for all executives and employees.
2. Safeguarding re-training shall be conducted annually.
3. KFHI shall also provide safeguarding training for related parties who interact with beneficiaries or have authorized access to their personal information before commencing work and activities for KFHI.
4. The training content shall include the purpose and details of this policy, the concept of

beneficiaries' rights, potential risks to beneficiaries, and how to recognize them, a code of conduct to protect beneficiaries from risks, procedures for reporting abuse and exploitation of beneficiaries or suspicions thereof, and other relevant topics.

5. The Safeguarding Oversight Department shall provide a training system and plan for the safeguarding policy. The Safeguarding Focal Points in each department shall conduct in-depth training based on the nature of their work and their direct or indirect contact with beneficiaries.

6. Media personnel responsible for filming and interviewing beneficiaries of KFHI shall receive prior training on the safeguarding policy and the protection of beneficiaries in media use.

Chapter 6. Reporting and Response

Article 16 (Duty to Report)

1. All executives and employees of KFHI are responsible for reporting safeguarding issues if they witness, suspect, or become aware of any safeguarding issues. When reporting, the procedures outlined in this policy must be followed.

2. Safeguarding issues must not be ignored, concealed, or encouraged. Disciplinary action may be taken if such conduct is discovered.

Article 17 (Reporting and Response Principle)

1. KFHI is responsible for reporting and responding to safeguarding cases when a report is received. KFHI shall handle all cases related to safeguarding that have occurred, regardless of the content, with carefulness and strictness. Such cases include:

- ① Cases or suspected cases where children and vulnerable groups have suffered actual damages, such as abuse and exploitation, due to a violation of this policy.
- ② Cases or suspected cases where children and vulnerable groups have not suffered actual damages, but were exposed to potential risks due to a violation of this policy.

Article 18 (Reporting Procedure)

1. KFHI executives, employees and related parties who are concerned about, suspect, witness, or receive a safeguarding-related case shall report within 24 hours using one of the methods below.

- ① (In the case of KFHI executives and employees) Report directly to their managers.
- ② Report anonymously or under a real name through KFHI's safeguarding report filing system (protect@kfhi.or.kr, email filing).

2. When reporting a safeguarding case, the following information must be included, using the safeguarding reporting form.

- ① Time, date, and place of the case.
- ② Details of the case.
- ③ Relevant measures taken to protect children and vulnerable groups at the time of reporting.
- ④ Immediately needed help or actions.

3. KFHI Executives, employees and related parties, or the managers or officers who have received reports of safeguarding cases shall fill out the safeguarding reporting form and file it through KFHI's safeguarding report filing system (e-mail).

Article 19 (Investigation and Response)

1. KFHI will take all safeguarding cases seriously. The Safeguarding Lead will ensure that reported cases are thoroughly investigated, documented, and addressed.
2. If a safeguarding case is reported through the report filing system, the Safeguarding Lead will assign the Safeguarding Focal Point from the department related to the reported case and provide support for the investigation.
3. The Safeguarding Focal Point will interview and investigate the executives, employees, and related parties involved in the case. During the investigation process, the situation of the beneficiary (victim) will be identified, and relevant support will be provided.
4. Any executives, employees, and related parties suspected of safeguarding violations will be separated from work related to the case as soon as the report is received. They should be separated in a way that avoids contact with the reporter or victim.
5. If a victim needs to be interviewed, the victim's wishes will be respected, and appropriate measures will be taken in consideration of age, gender, language, disability, etc. of each child and vulnerable person. If the victim is a child, a professional who can provide child counseling will conduct the interview as much as possible.
6. The Safeguarding Focal Point will record the investigation of the received case and report the results to the Safeguarding Lead. Written reporting will be prioritized, but if there are concerns about the victim's safety, oral reporting may be allowed.
7. The Safeguarding Lead will report the investigation results to the president and make decisions regarding the closure of the relevant case, support for victims, and disciplinary action against perpetrators. Follow-up actions will be taken in accordance with relevant policies and processes within the organization.
8. If it is deemed an exceptional case, such as a possibility that the safeguarding case has caused grave damage to the victim or there is a possibility that KFHI's reputation may be seriously damaged, the Safeguarding Lead may report the case directly to the president prior to conducting an investigation of the case. The Safeguarding Oversight Department will then take appropriate measures, such as external consulting or investigation in connection with the investigation of and response to the case.

9. If local law requires that the relevant case be reported to a judicial authority or if the victim seeks judicial response, it will be reported to law enforcement agencies and cooperation will be made in the investigations. At this time, the safety and interests of the victim will be considered a top priority, and sufficient information will be provided to the victim.

10. Any document produced in the process of reporting and investigating a safeguarding case will be sent to the Safeguarding Lead. The Safeguarding Oversight Department will prepare a final report on the case, including investigation details and the actions taken.

11. The Safeguarding Oversight Department will encrypt and store records related to the safeguarding case and manage them confidentially.

Article 20 (Support for Victims)

1. KFHI shall provide support to victims in the event of a safeguarding case caused by its executives, employees, and related parties or its activities.

2. Victim support shall take a victim-centered approach, and the support process shall fully reflect the victim's needs and individual characteristics such as age, gender, disability, etc. KFHI shall provide services, networks, and programs in a manner that is culturally appropriate and does not isolate or stigmatize victims.

3. KFHI shall provide support to victims, such as psychological counseling, medical support, legal support, safety guarantees, etc.

4. Victim support shall be primarily provided by KFHI, but priority shall be given to utilizing available resources in the country where support is provided. (Support provided by government agencies or civil society organizations can be utilized).

5. KFHI shall protect victims and maintain confidentiality during the investigation process.

6. Victims shall be provided with all relevant information about available support and shall have the opportunity to speak about appropriate support.

7. Victims shall be informed of their rights and the procedures for their cases before they provide information on their cases. Victims must voluntarily consent to provide information, based on a clear understanding of the potential consequences of providing information.

8. Victims have the right to withdraw their report or change their decision at any time. However, legal obligations and KFHI's obligations in many countries may affect this right. Such matters shall be disclosed in advance.

9. KFHI shall provide victims with information related to their cases, such as investigation details and follow-up measures, periodically.

10. To prevent secondary damage such as stigma and isolation during the investigation of victims regarding the violations, the following shall be observed:

- ① The victim or the person expected to have suffered damage shall not be forced to prove the fact of damage.

- ② The victim or the person expected to have suffered damage and the perpetrator or the person expected to have inflicted damage shall be separated from each other.
- ③ When interviewing the victim or the person expected to have suffered damage, precautions shall be made to not say or do anything that inflicts secondary victimization.

Article 21 (Discipline and Measure for Perpetrator)

1. In the event that an investigation confirms allegations against an executive or employee of KFHI, disciplinary action shall be taken in accordance with KFHI's HR policy.
2. If the investigation confirms allegations against a related person, the contract between the person and the organization to which they belong shall be terminated, and measures shall be taken to prevent the person from entering into any future relationship with KFHI.
3. Acts of retaliation and false reporting against victims, reporters (those who report the issue), and witnesses shall also be considered grounds for disciplinary action.

Article 22 (Confidentiality)

1. Information related to safeguarding violation cases shall be collected and stored in compliance with relevant laws, such as the Personal Information Protection Act.
2. If collecting information related to the violation could cause secondary harm to the victim, the information shall not be collected.
3. Information collected during the violation case and its investigation process shall be disclosed only to the minimum number of people who absolutely need to know. A 'confidentiality pledge' shall be signed and managed to prevent any unauthorized disclosure of information to the outside.
4. Documents related to violations and their investigations shall be managed in accordance with KFHI's confidential document management procedure.

<Addenda>

Article 1 (Matters Not Specified in This Policy) Matters not specified in this policy shall be subject to general rules and customary practices.

Article 2 (Revision) Revisions of this policy shall be approved by the KFHI president.

Article 3 (Enforcement) This policy shall take effect from the date of approval by the president.

Enactment: April 2022

Revised: April 2023