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1 Yishun Industrial Street 1, A'Posh  
Bizhub, #07-19, Singapore 768160  
Company Registration No: 201220312E

## Code of Conduct

### Principle 1 – Professional Integrity

You are a representative of Firefly Photography and are expected to demonstrate behaviour consistent with the highest standards of professional conduct. This means you must conduct yourself with integrity, taking responsibility for your actions and act in a way that promotes trust.

You should also treat Firefly Photography's assets such as equipment and computer with care and only use these assets for legitimate purposes. This includes email and internet services which may be monitored.

You should

- a) Carry out your duties with honesty, fairness, integrity, professionalism and in line with ethical principles.
- b) Treat fellow staff with respect and dignity
  - a. Never belittle someone (Personal attacks, calling names)
  - b. Never complain or create animosity among colleagues as this will create a toxic culture
  - c. Offer gratitude by saying thank you and sorry based on relevant circumstances
  - d. Always offer care and help to each other
- c) Comply with Firefly Photography Policies and Standards and Guidelines.
- d) Treat Firefly's assets with care and only use it for legitimate Firefly Business purposes
  - a. I.e. Equipment, Computers, Backdrops
- e) Always do your best to propose a solution to a problem you face during work to your supervisor or colleague before seeking resolution from them.

### Principle 2 – Confidentiality

In the course of performing your duties, you may have access to Firefly proprietary information, confidential and trade secrets such as quotations, software systems and pricing. It may be in various forms, including in oral, written or electronic formats that can include confidential information, data and visual materials relating to Firefly Photography, our business associates (including customers, partners and suppliers) or our staff.

You should use such information accordingly to its purpose and intent, in compliance with relevant company policies and standards.

You should

- a) Use information to its purpose and intent, in compliance with the relevant laws and Firefly policies and standards. (Refer to employee contract if applicable)
- b) Obtain clearance from Director(s) prior to sharing any confidential information.





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- c) Not at any circumstances share company or business associates data, videos, photos with any individual or entity outside of Firefly without any prior permission from the director(s).
- d) Remember your obligation to protect the confidentiality of information received during your employment continues even after you cease employment with Firefly Photography.

### Principle 3 – Conflicts of Interest

A conflict of interest arises when you have competing professional or personal interests making it difficult to fulfil your duties properly, or creates an appearance of impropriety that could undermine customer or public confidence. Conflicts of interest could arise in dealings among Firefly Photography employees and also between you and Firefly or others (e.g. customers, business associates, competitors etc).

An example will be accepting a bribe may benefit you financially, but it is illegal and against our business code of ethics. If we become aware of such behaviour, you will lose your job and may face legal trouble.

You are expected to be vigilant to spot circumstances that creates conflicts of interest, act in Firefly Photography's best interests. Whenever possible, do not allow personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to your direct supervisor or other manager and we will do our best to resolve it.

You should

- a) Avoid all situations that could result in conflicts of interest.
- b) Exercise good judgement when offering or accepting gifts from customers (existing or potential), business associates, brokers, or members of the public.
- c) Avoid any personal investment in the business of a customer, supplier, competitor, or business introduced by or affiliated with a customer or supplier.
- d) Comply with reporting and disclosure requirements of potential or actual conflicts of interest to your direct supervisor or other manager.
- e) Consult your direct supervisor or other manager as soon as you are aware of any actual or potential conflicts.

### Principle 4 – Fair Dealings

We aim to serve the media needs of our customers within the boundaries of fair, ethical and legal business practices. Firefly Photography strives to be an organisation strongly supporting vigorous but fair competition.

We aim to promote a competitive marketplace that is free to provide consumers and businesses with high quality goods and services at fair prices, and to prevent conduct interfering with this outcome. Failure to comply can have serious consequences for Firefly Photography, including long and





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expensive regulatory investigations, substantial fines or damages, and publicity damaging to our brand and reputation.

You should

- a) Comply with Firefly policies, Standards and Guidelines.
- b) Comply with applicable laws, rules and regulations.
- c) Disclose to customers the terms and conditions of services provided, the risks of any transaction entered into by customers(if any) , and our charges and fees.
- d) Respond promptly to customers' needs, requests and enquiries e.g. terms and conditions of voucher redemptions, top-up options and package information.
- e) Act with honesty and integrity when dealing with our customers.
- f) Treat our customers with dignity and respect.
- g) Offer products and services that are suitable for our customers.
- h) Be competent to undertake proper fact-find, customer profiling and know your customer analysis (e.g. Family looking to do a photoshoot for 4 with little children looking for an appropriate package) provide our customers with quality advice, appropriate recommendations, clear and timely information.
- i) Execute customers order, project and assignments promptly, efficiently and accurately.

### Principle 5 – Dress Code

All employees are required to be neat and tidy in appearance. Without prejudice to Firefly Photography equal opportunities and Harassment Prevention policy, whenever there is any possibility that you will have direct contact with customers, you must look proper, smart and well-groomed and conform to appropriate standards of work attire. Work attire must be smart, and must be suitable especially when meeting with customers.

Your direct supervisor, manager or director reserves the right to determine what falls within the definition of suitable business attire and you may be required to return home to change your clothing or other matters relating to your appearance if it is unsuitable. Breaches of this may also result in disciplinary action, up to and including dismissal.

### Principle 6 – Equal Opportunities and Harassment Prevention

#### PURPOSE

Firefly Photography is an equal employment opportunity employer and will not tolerate unlawful discrimination or harassment in its workplace. Equal employment opportunity (EEO) means the systems and policies put in place to prevent discrimination in the workplace.

Firefly Photography aims to provide equal employment opportunities for all applicants and advancement opportunities to all employees. Employment decisions will be based on merit, qualifications and abilities. Adobe does not discriminate in employment opportunities or practices on





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the basis of race, colour, religion, sex, sexuality, national origin, age, disability, marital status or any other characteristics protected by law.

Firefly Photography's goal is to promote a workplace that is free from harassment and strongly disapproves of and will not tolerate harassment. The policy for Equal Opportunities and Harassment Prevention applies to all persons involved in the operation and prohibits unlawful harassment by any employee, including management, as well as by any person doing business with or for Firefly Photography. Firefly Photography will take all appropriate steps within its control to prevent the occurrence of harassment.

#### SCOPE

This policy applies to all employees, customers and contractors of Firefly Photography. This policy applies in the workplace and to all work related off site events, including business trips, social events, business meetings and training programs within and outside normal office hours. It is the responsibility of every employee and contractor to comply with this policy.

#### DISCRIMINATION

Discrimination means engaging in any conduct which results in a person being treated less favourably than others because of a particular characteristic that person has, including a person's:

- - Race (including a person's colour, nationality, descent and ethnic, ethno- religious or national origin);
- - Marital status (i.e., because a person is single, married, divorced or in a de facto relationship );
- - Age;
- - Gender or transgender status;
- - Sexual preference;
- - Religious beliefs;
- - Pregnancy and/or breastfeeding (including because a person may become pregnant or breastfeed);
- - Disability (including a disability that you think a person may have);
- - Carer's responsibilities (i.e., responsibility to care for children or other family members);
- - Political beliefs and/or activity;
- - Union membership and/or activity.

Firefly Photography does not permit any employee to treat a person less favourably because they have a personal association with someone who has one or more of the above attributes.

#### VILIFICATION

It is against Firefly Photography's policy to do any public act which vilifies a person on the basis of their race or sexual preference. Vilification means any public act which could encourage hatred, contempt or ridicule of a person because of their race or sexual preference. Examples of vilification include publicly making speeches or statements or wearing clothing with slogans that vilify others.

#### HARASSMENT IN THE WORKPLACE

It is against Firefly Photography's policy to harass any other person at work. Harassment includes any type of unwelcome behaviour that is based on one of the attributes listed above (for example, sex, race, disability etc) which offends, humiliates or intimidates the person being harassed. The fact that





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the behaviour complained of may not have been intended to humiliate or intimidate another person will not prevent the behaviour being discrimination and/or harassment.

Employees should be particularly aware of the suitability or otherwise of proposed social events, including the possibility that social behaviour which they personally find acceptable may be found upsetting, intimidating or experienced as harassment by their colleagues. Disciplinary action will be taken against any person found responsible for harassment on such occasions.

The most common forms of harassment in the workplace are sexual harassment and bullying. Neither will be tolerated by Firefly Photography and may result in severe consequences such as stoppages of leave, salary deduction to the highest extend based on MOM standards and termination.

### SEXUAL HARASSMENT

Sexual harassment means any unwelcome behaviour of a sexual nature which a reasonable person in the circumstances would find offensive, humiliating or intimidating. Examples of sexual harassment include:

- - Inappropriate physical contact, verbal comments, offensive jokes and sexual propositions;
- - Communications displaying offensive material (for example, posters and/or calendars);
- - Offensive emails (including jokes);
- - Requests for sex or other unwelcome sexual advances;
- - Unwelcome questions about a person's private life.

### VICTIMISATION

It is against Firefly Photography's policy to victimise or otherwise disadvantage a person who alleges that they have been discriminated against or harassed. Any employee or contractor, who victimises, threatens, intimidates or otherwise places at a disadvantage a person who alleges they have been discriminated against or harassed will be subject to disciplinary steps including the termination of their employment.

### RESPONSIBILITY AND PROCEDURES - Employees

Employees are responsible for:

- Immediately notifying their direct manager, supervisor or other managers if they experience harassing or discriminatory behaviour and/or are aware of any such behaviour by any individual.
- Where possible identifying the offensive behaviour to the person engaging in the behaviour and requesting that it stop.

### Managers

Managers are responsible for:

- - Making employees aware of this policy and for preventing harassment from occurring.
- - Receiving any complaints of harassment.
- - Immediately reporting any complaints of harassment to Human Resources.
- - Reporting to Human Resources any incidents of harassment about which they become aware, even if no complaint is made.





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- HR will promptly undertake effective, thorough and objective investigation of any harassment allegations.
  - - HR will handle an employee complaint with sensitivity and, to the maximum extent that Firefly Photography judges feasible, attempt to maintain confidentiality.
  - - HR is responsible for taking any appropriate disciplinary or remedial action in respect of a complaint.

#### CONSEQUENCES OF BREACH

Any employee or contractor who engages in conduct contrary to this policy will be disciplined. Serious cases of discrimination, harassment or victimisation will result in termination of employment.

#### EXCEPTIONS

There are no exceptions to this policy.

Any employees with questions or concerns about any type of discrimination or harassment in the workplace are encouraged to bring these issues to the attention of their immediate Manager, other managers or Human Resources.

## 2. Workplace Bullying

Firefly Photography will not tolerate any forms of bullying in the workplace or outside of work, amongst employees. It is unlawful and against Firefly Photography's policy. The same consequences will apply to employees found bullying as stated above in the "Equal Opportunities and Harassment Prevention". This can be up to and including termination. As with the above policy, there are no exceptions and no single employee of Firefly Photography is exempt from this policy.

#### WHAT IS BULLYING?

Bullying is any type of behaviour, or series of similar or different behaviours, that unfairly or unreasonably puts down, belittles, undermines, controls, abuses, scares, intimidates, excludes, offends or embarrasses.

Some characteristics of Bullying:

- Deliberate bullying is generally an abuse of power
- Bullying can be overt or covert
- Bullying generally consists of more than one act
- Bullies are often serial bullies

## Principle 7 – Cyber security, Digital Devices and Social Media

### Internet usage

Our corporate [internet connection is primarily for business](#). But you can occasionally use our connection for personal purposes if they don't interfere with your job responsibilities.

You must not use our internet connection to:

- Download or upload obscene, offensive, or illegal material.





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- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material, or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

## Cell phone

We allow [use of cell phones at work](#). But we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use common area or corridor so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal, or obscene material using our corporate internet connection.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g., during a photoshoot or filming.)

## Corporate email

Email is essential to our work. You should use your [company email](#) primarily for work, but we allow some uses of your company email for personal reasons.

- **Work-related use.** You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.
- **Personal use.** You can use your email for personal reasons if you keep it safe and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download eBooks, guides, and other safe content for your personal use.

## Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable, or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.





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- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask your immediate manager.

## Social media

We want to provide practical advice to prevent careless use of [social media in our workplace](#). We address two types of social media uses: using personal social media at work and representing our company through social media.

### Using personal social media at work

You are permitted to access your personal accounts at work. But we expect you to act responsibly, according to our policies and ensure that you stay productive. Specifically, we ask you to:

- **Discipline yourself.** Avoid getting sidetracked by your social platforms.
- **Ensure others know that your personal account or statements don't represent our company.** For example, use a disclaimer such as "opinions are my own."
- **Avoid sharing intellectual property (e.g., trademarks) or confidential information.** Ask your manager or director first before you share company news that's not officially announced.
- **Avoid any defamatory, offensive, or derogatory content.** You may violate our company's anti-harassment policy if you direct such content towards colleagues, customers, or partners.

### Representing our company through social media

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite, and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism, and fair use.
- Coordinate with our [Director/PR/Marketing department] when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

Principle 8 – Personal Information, Security of Personal Property, Friendships at work, Solicitation and distribution

## Personal Information





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You must immediately inform HR and your manager of any change in your personal information, such as address, telephone number, name, marital status or dependants. The Company maintains a personnel file on each employee. It includes such information as the employee's Curriculum Vitae, employment contract, records of training, copies of agreements in relation to Company funded training, copies of performance reviews, salary reviews and other employment records.

Personal information about employees, including residential addresses, personal telephone numbers and details of next of kin, is treated as strictly confidential. Such information will not be released outside the Company, other than to Company advisers or as required by law, unless prior authorisation has been received from the employee concerned.

### **Security of Personal Property**

Firefly Photography does not accept any liability for any damage to, or any loss or theft of, any personal property on the Company's premises. Money or valuables should not be left on Company premises.

### **Friendships at work**

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But we expect you to focus on your work and keep personal disputes outside of our workplace.

### **Solicitation and distribution**

Solicitation is any form of requesting money, support or participation for products, groups, organizations or causes which are unrelated to our company (e.g., religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

We don't allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g. adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized, or authorized by our company.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g., recreation, volunteering.)
- Ask colleagues to participate in employment-related activities or groups protected by law (e.g., trade unions.)

In all cases, we ask that you do not disturb or distract colleagues from their work

### **Workplace Visitors**



EVENT. WEDDING. CORPORATE. VIDEOGRAPHY. PHOTOBOOTH

INSTANT PRINT. PARTNERSHIPS. PORTRAIT. SPONSORSHIPS.



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If you want to invite a visitor to our offices, please ask for permission from your immediate manager first. Also, inform and ensure there is always someone to welcome and tend to the visitor.

When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors
- Keep your visitors away from areas where there are dangerous machines, chemicals, confidential records, or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations, or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at the office front gate.

### **Principle 9 – Workplace Health and Safety**

Firefly Photography is committed to provide a healthy and safe work environment for employees, customers, business partners and visitors. Every employee has a personal responsibility to support this commitment.

Employees are obliged to carry out their work in a safe manner, without causing harm to themselves or others, and to report any potentially unsafe or unhealthy situations immediately.

They must observe and follow all safety and environmental regulations laid down in the operation instructions and use your best judgement possible, including putting on the necessary safety equipment, and conduct specific risk assessment prior to carrying out any works including team building activities, where applicable.

All employees must observe the rules of office security and adhere to COVID-19 measures such as cleanliness, sanitization, housekeeping, temperature taking and safe entry.

### **Principle 10 – Compliance with the Law, Alcohol and Drugs**

In addition to the Code, Firefly Photography expects employees to comply with all laws, regulations, codes of practice, and legal, regulatory and licensing requirements applicable to the different jurisdictions where it operates.

Employees should not engage in any activity that adversely affects the Firefly's interests or reputation, including but not limited to, engaging in any act whether in the workplace or otherwise that, in the sole discretion of the company, involves violent behaviour, moral wrongdoings, or which constitutes a criminal act under all applicable laws, regulations and legal requirements, regardless of whether the employee is criminally charged or convicted.

Drugs and/or alcohol can impair an individual's capacity to perform his/her job safely, efficiently and with respect for colleagues and customers. The use of such substances may result in injury or a threat to the well-being of an individual, colleagues, customers or members of the public.

An employee must attend work in a fit state and is not to be under the influence of alcohol or drugs during working hours.





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Involvement with the manufacture, possession, use, distribution, sale, purchase, or transfer of illegal drugs is strictly prohibited.

### **Principle 11 – Employment Outside Firefly Photography**

Employees should not engage in any outside employment or hold any position without the prior written consent of the Firefly Photography's director, as appropriate unless such employment has been arranged or is undertaken in connection with the performance of their responsibilities and duties as part of the Firefly Photography.

All outside appointments and activities (including business activities), directorships and employment must be declared and approved in advance.

If employees are considering accepting an external appointment, they must consider if accepting this position may give rise to the possibility of conflict. If they have been given permission to take on such employment or to have other business relationships, they must ensure that these activities do not negatively affect their ability to fully and effectively perform their role for Firefly Photography or Firefly Photography's reputation and/or its services to customers or Firefly Photography's current or future business plans.

