



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

Code of Ethical Conduct

Our commitment to ethical conduct that aligns with our values.

1 Introduction

This Code of Ethical Conduct sets out our commitment to ethical behaviour in everything we do. It also provides a guide for our personnel on what to do if there is actual or suspected non-compliance.

2 Scope of the Code

- (a) This Code of Ethical Conduct applies to all our personnel (being our directors, employees, interns, students on vocational placement, volunteers, and independent contractors and consultants).
- (b) This Code applies at the workplace, while our personnel are on duty and while they are off duty if a connection can be made with us. The following is a non-exhaustive list of examples of when personnel may be off duty but a connection can be made with work:
 - (i) posting on social media about work, work activities or colleagues (including through a personal social media account);
 - (ii) browsing websites or watching videos while using a work-issued device such as a laptop or phone;
 - (iii) while appearing in public with our merchandise, such as wearing a t-shirt with the panda logo;
 - (iv) while socialising with work colleagues outside work if it is clear to the general public you work for us; and
 - (v) in any place, if you engage in behaviour that causes any type of harm to another person or damages our property or reputation if a connection can be made with work.
- (c) Where there is an overlap between this Code of Ethical Conduct and our other policies, this Code of Ethical Conduct will take precedence to the extent of any inconsistency.

3 Commitments

3.1 High standard

- (a) We are committed to maintaining our values and a high standard of ethical conduct at all times. This is particularly important because of the nature of our work and the trust and support we enjoy with our stakeholders and the community at large.



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

- (b) Our personnel will not engage or act in a manner that causes any type of harm to another person, causes harm to place or property or causes actual or potential harm to our reputation or brand or the reputation or brand of the broader WWF network.
- (c) As part of this Code of Ethical Conduct, we will uphold the Australian Council for International Development Code of Conduct (<http://www.acfid.asn.au/code-of-conduct>) (ACFID Code).
- (d) Compliance with this Code of Ethical Conduct, the law and our policies are conditions of working or undertaking any form of business with or for us. Any breach of this Code of Ethical Conduct is a serious matter that may compromise our status as a charity and/or funding for our work. A breach of this Code of Ethical Conduct may result in disciplinary action (including dismissal) and/or termination of a partnership or an agreement.

3.2 Decision-making

- (a) Ethical decision making requires us to exercise:
 - (i) judgement in canvassing both the potential positive or negative impacts of any decision on a range of stakeholders affected; and
 - (ii) a duty of care in making all decisions so that potential harm is minimised.
- (b) Decision-making should be guided by:
 - (i) respect for internationally recognised human rights and the essential dignity of every person;
 - (ii) an active concern for the wellbeing of all people, their communities and the environments in which they live; and
 - (iii) our commitment to providing a safe workplace in which people can thrive.

3.3 Our values

We are committed to upholding the following shared WWF values:

- (a) **Integrity:** *We live the principles we call on others to meet. We act with integrity, accountability and transparency, and we rely on facts and science to guide us and to ensure we learn and evolve.*
- (b) **Collaboration:** *We deliver impact at the scale of the challenges we face through the power of collective action and innovation.*



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

- (c) **Courage:** *We demonstrate courage through our actions, we work for change where it's needed, and we inspire people and institutions to tackle the greatest threats to nature and the future of the planet, which is our home.*
- (d) **Respect:** *We honour the voices and knowledge of the people and communities that we serve, and we work to secure their rights to a sustainable future.*

3.4 Safeguarding

- (a) We are committed to acting with respect and upholding the human rights and dignity of all persons we engage with or who are affected by our activities and work.
- (b) We have no tolerance for harming or exploiting any person. We are committed to promoting and protecting the welfare and human rights of vulnerable individuals, including children, in particular:
 - (i) any vulnerable individuals who are affected by our activities and work; and
 - (ii) any of our personnel who may be vulnerable individuals.
- (b) All our personnel:
 - (i) must contribute to an environment that is supportive of safeguarding; and
 - (ii) must agree with our Safeguarding Code of Conduct (a copy of which is attached to this Code of Ethical Conduct).

3.5 Safety and Wellbeing

- (a) We are committed to supporting the health, safety and wellbeing of all of our personnel and all persons we engage with or who are affected by our activities and work.
- (b) Health, safety and wellbeing is everyone's responsibility. Our personnel are encouraged to speak up and take action if they witness something that could harm themselves or others.

3.6 Human rights and Social Inclusion

- (a) We recognise that human rights are central to achieving effective, equitable and sustainable conservation and development outcomes.
- (b) We acknowledge that human rights are universal, inalienable, interdependent and interrelated and that everyone is born with and possesses the same human rights, regardless of nationality, ethnicity, indigeneity, race, age,



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

gender, gender identity, sexuality, sexual orientation, religious or political affiliation, disability, poverty, socio-economic status, caste, class, displacement or any other status.

- (c) We are committed to respecting and promoting internationally recognised human rights, including the right to a safe, clean, healthy and sustainable environment. We work to incorporate our commitments to human rights in our communications and advocacy.
- (d) We promote approaches to conservation that support the rights and aspirations of people involved in or affected by our work and commit to integrating these approaches across our activities and work.
- (e) We seek to identify instances of potential and actual negative human rights impacts connected with our activities and work, having regard to the surrounding context and the essential dignity of every person. We take appropriate and proportionate steps to either prevent or address those impacts.
- (a) We recognise the need to make special efforts to prevent harm to people and groups who are often marginalised or particularly vulnerable to infringements of their rights, and to support the protection and fulfilment of their human rights within the scope of our work.
- (f) We seek to support rights holders to exercise their rights and to hold duty-bearers accountable.

3.7 Transparency

- (a) We are committed to promoting personal accountability and responsibility at work and ensuring we work openly and collaboratively with each other and with our key stakeholders.
- (b) We will declare any actual, perceived or potential conflicts of interest and manage such matters transparently.
- (c) All our personnel are strongly encourage to speak up if they identify or suspect any illegal activity, unethical conduct, other wrongdoing or negative impacts of our activities or work.

3.8 Ethical fundraising

- (a) We are committed to ethical fundraising practices which honour the trust that our supporters place in us.
- (b) In our fundraising activities, we will uphold the Fundraising Institute of Australia Code (<https://fia.org.au/fiacode/>) and the ACFID Code.



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

4 Code in Practice

4.1 What we mean in this Code of Conduct

- (a) By “**vulnerable individual**” we mean a person who is often marginalised or particularly vulnerable to infringements of their rights because of their membership of a particular group or for another reason. This includes any child or individual who is or may be unable to protect themselves against harm or exploitation regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background.
- (b) By “**workplace**” we mean any place where work or other activities are carried out by or on behalf of us. This includes any place our personnel go, or are likely to be, while at work. Examples include but are not limited to our offices (including when working from home or remotely), project sites, and work-related events (such as work-related functions, meetings, conferences, post-conference dinners, fieldwork, Christmas parties and donor events) and other places where our personnel come into contact with other people in the course of their work (such as visitors, partners, supporters, candidates, and other stakeholders).

4.2 Responsibilities

- (a) **Code Approver:** accountable for approving this Code of Ethical Conduct, including approving after formal reviews.
- (b) **Code Owner:**
 - (i) accountable to the Code Approver for overseeing the implementation of and overall compliance with this Code of Ethical Conduct;
 - (ii) ensures this Code of Ethical Conduct is regularly reviewed (at least every two years or earlier if warranted); and
 - (iii) delegates the implementation, training, maintenance and monitoring of this Code of Ethical Conduct to the Code Lead.
- (c) **Executive team:** responsible for role modelling behaviour consistent with this Code of Ethical Conduct and the Safeguarding Code of Conduct.
- (d) **Code Lead:**
 - (i) responsible for the implementation, maintenance and monitoring of the Code of Ethical Conduct at an organisational level, including through appropriate procedures, training and reporting;
 - (ii) supports the Code Owner to review this Code of Ethical Conduct; and



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

- (iii) manages risk and compliance issues related to this Code of Ethical Conduct.
- (b) **All of our personnel:** must be familiar with, comply with and implement this Code of Ethical Conduct and the Safeguarding Code of Conduct attached, and manage safeguarding and other ethical risks.
- (c) Detailed responsibilities can be found in our Policy Lifecycle Stages, Roles and Responsibilities (see Annexure A to the Policy Governance Framework) – for the purposes of this Code of Ethical Conduct, replace references to “policy” with “Code”.

4.3 Reporting and Managing Incidents

- (a) If any personnel believes that an incident or breach of this Code of Ethical Conduct has occurred or is likely to occur, they must report the matter:
 - (i) where the matter relates to a breach of this Code of Ethical Conduct or the Safeguarding Code of Conduct, to the Chief Executive Officer or our Board;
 - (ii) where the matter relates to a breach of any of our other policies, to the person or persons specified in that policy or policies to whom incidents must be reported; and
 - (iii) in all other circumstances, to the person’s line manager or to the line manager for responsible for that line manager,and comply with that person’s (the **relevant person**) directions.
- (b) If an external stakeholder or any other person believes that that an incident or breach of this Code of Ethical Conduct has occurred or is likely to occur, they can report the matter in accordance with our Speak Up Policy or Complaints Handling Policy.
- (c) The relevant person must ensure that the report is promptly and appropriately investigated with due confidentiality in accordance with the relevant policies or procedures.

5 Availability of this Code of Ethical Conduct

We will ensure that this Code of Ethical Conduct is available to download on our website and intranet.



<u>Code Approver:</u>	Board
<u>Code Owner:</u>	Chief Executive Officer
<u>Code Lead:</u>	Head of Human Resources

6 Revision History

Action:	Date of Board meeting:
Approval and adoption of the Code of Ethical Conduct by the Code Approver	31 October 2023
Revision	[insert]



Safeguarding Code of Conduct

This code sets out expectations in terms of behaviour and conduct of all our personnel (meaning our directors, employees, interns, students on vocational placement, volunteers, and independent contractors and consultants), implementing partners, downstream partners and official visitors.

All our personnel and official visitors are required to sign this Safeguarding Code of Conduct.¹

In this Code:

- (a) By “**official visitors**”, we mean anyone invited by us to participate directly in our activities or work or visit any of our offices or project sites. This includes but is not limited to donors, campaign ambassadors, grantee representatives and auditors.
- (b) By “**personnel**” below, we mean our personnel and the personnel of implementing partners and downstream partners.
- (c) By “**vulnerable individual**”, we mean a person who is often marginalised or particularly vulnerable to infringements of their rights because of their membership of a particular group or for another reason. It includes any child or individual who is or may be unable to protect themselves against harm or exploitation regardless of their age, gender, race, religious beliefs, disability, sexual orientation, or family or social background.

All our personnel while on duty and off duty, and all official visitors while visiting our office(s) or project site(s), must:

- (a) treat all vulnerable individuals with respect;
- (b) not engage in sexual relationships with:
 - (i) any persons participating in, or benefitting from, our work; or
 - (ii) other people where there is unequal power dynamics or potential for abuse of power;
- (c) not sexually exploit, sexually abuse or sexually harass any person, including not engaging in:
 - (i) sexual relationships with any vulnerable individual given their vulnerability, because such relationships are based on inherently unequal power dynamics and are likely to undermine the credibility and integrity of our work; or
 - (ii) any form of transactional sex with any vulnerable individual (meaning situations where money, employment, goods, or services are

¹ For the avoidance of doubt, we do not require the individual personnel of implementing partners and downstream partners to sign unless specifically requested by us.



exchanged for sex, sexual favours, including exchange of benevolence/assistance that is due to the people we serve);

- (d) not withhold assistance or give preferential treatment or gifts in order to solicit favours, gifts, payments or advantage of any kind;
- (e) not provide any gifts, alcohol or drugs to any person under 18 years of age;
- (f) not physically punish or discipline any person under 18 years of age (except the person's own children);
- (g) not act in ways that may place a vulnerable individual at further risk of abuse, including:
 - (i) not giving due consideration to assessing and reducing potential risks to the person in our activities or work;
 - (ii) using inappropriate language or behaviour when dealing with a person;
 - (iii) bullying and harassing a person verbally or physically;
 - (iv) physical punishment; or
 - (v) exposing a child to pornography including on-line grooming and trafficking;
- (h) ensure that another adult is present when staying in the same room or working in the proximity of vulnerable individuals. If this is not possible, consent must be obtained from the vulnerable individual and one of their parents or guardians (if applicable), with proper planning and risk mitigation undertaken prior to the unaccompanied interaction taking place;
- (i) not invite unaccompanied vulnerable individuals into private residences, unless they are at immediate risk of injury or in physical danger;
- (j) not use any computers, mobile phones, video cameras, cameras or social media to exploit or harass any vulnerable individual, or access exploitation material through any medium;
- (k) not hire children for domestic or other labour, which:
 - (i) is inappropriate given their age or developmental stage; or
 - (ii) interferes with their time available for education and recreational activities; or
 - (iii) places them at significant risk of injury;
- (l) comply with all applicable laws, including laws in relation to the protection of vulnerable individuals;



- (m) immediately disclose to us all charges, convictions and other outcomes of an offence (whether past or present) with respect to a failure to protect any vulnerable individual; and
- (n) only use and share data regarding children and vulnerable individuals in relation to our activities and work if and as they are approved to do so;
- (o) when photographing or filming a child for work-related purposes, our personnel must:
 - (i) before photographing or filming a child:
 - (A) assess and endeavour to comply with local traditions or restrictions for reproducing personal images;
 - (B) obtain informed consent from the child and/or a parent or guardian of the child (using accessible communication methods and after explaining how the photograph or film will be used);
 - (ii) ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner, including ensuring that children depicted are adequately clothed and are not depicted in sexually suggestive poses;
 - (iii) ensure images are honest representations of the context and the facts; and
 - (iv) ensure file labels, meta data or text descriptions do not reveal identifying and location information about a child when sending images electronically or publishing images in any form.

I, (full legal name)

of (name of organisation)

agree that I will comply with the Safeguarding Code of Conduct as set out above.

Signed:

Date: