



Code of Conduct

Revision 1 – Date – August 2018



Australian Wildlife Conservancy

Overview

Australian Wildlife Conservancy's (**AWC**) mission is the effective conservation of all Australian animal species and the habitats in which they live. This Code has been put in place to promote compliance with legal and ethical standards and to preserve AWC's reputation, integrity and thus, long term viability.

Where circumstances arise where you have concerns regarding conduct that is not covered by this Code or other AWC policies, you are encouraged to seek guidance from your Manager.

Our Principles

At AWC, we are expected at all times to act consistently with the following principles:

1. [Actively pursue AWC's mission to effectively conserve all Australian animal species and the habitats in which they live, and otherwise act in the best interests of AWC;](#)
2. [Act honestly and with integrity;](#)
3. [Treat people with respect and maintain professional working relationships;](#)
4. [Take reasonable care to protect the health and safety of yourself and others, and not engaging in harassment, bullying, discrimination or victimisation;](#)
5. [Identify and manage conflicts of interest, including the reporting of gifts;](#)
6. [Use the resources of AWC in a responsible and accountable manner;](#)
7. [Comply with all applicable laws, policies, procedures and directions;](#)
8. [Only speak on behalf of AWC if expressly authorised to do so;](#)
9. [Encourage indigenous participation;](#)
10. [Respect and maintain privacy, confidentiality of information and accuracy of business records.](#)

Application

This Code promotes specific conduct principles and applies to everyone who performs work at AWC or engages in an AWC approved activity including directors, employees, contractors, consultants, interns, volunteers, students and other researchers. This Code outlines AWC's expected standard of conduct but we recognise it is not possible to cover all possible situations.

This Code applies:

- in the workplace or in the conduct of AWC approved activities, at an external site, including work outside normal working hours;
- during work activities, including dealing with external parties; and
- at work-related events, including seminars, courses and social functions.

Everyone who performs work at AWC or is engaged by AWC in an AWC approved activity, is responsible for ensuring that they:

- are familiar with this Code;
- comply with this Code;
- promote compliance of these standards in their immediate workplace;
- attend any training provided by AWC from time to time; and
- take all reasonable steps to ensure that our workplace is free from unacceptable behaviour.

This policy does not form part of any contract and may be reviewed and updated by AWC as require. The most recent version of this Code will be made available to all those on site as part of their induction to site. This Code will be located on the AWC Intranet and in hard copy at AWC workplaces.

1. Actively pursue AWC's mission, and act in the best interests of AWC

Everyone at AWC is engaged to:

- actively pursue AWC's mission to effectively conserve all Australian animal species and the habitats in which they live;
- act in the best interests of AWC; and
- not bring AWC into disrepute.

2. Act honestly and with integrity

Honesty, integrity and fairness are integral to the way AWC operates and should guide the decisions we make. We are all required to act in a professional manner by making decisions fairly, ethically, impartially and promptly considering all available information, legislation, policies and procedures and maintaining adequate documentation supporting decisions made.

3. Treat people with respect and maintain professional working relationships

Treating people with respect and maintaining professional working relationship involves:

- treating people with courtesy, and tolerance, and having proper regard for their interests, rights, safety and welfare; and
- dealing with others professionally in the conduct of your work, regardless of any personal relationships, and
- avoiding any unnecessary debate, argument or controversy.

4. Take reasonable care to protect the health and safety of yourself and others, and not engaging in harassment, bullying, discrimination or victimisation

We must all maintain and contribute to a safe and productive working environment by:

- using personal protective equipment where appropriate;
- obeying any reasonable instruction given in relation to health and safety; and
- not engaging in harassment, bullying, discrimination or victimisation against colleagues or members of the public.

5. Identify and manage conflicts of interest including reporting of gifts

We all have a responsibility to look after AWCs best interests and should apply professional integrity to all actions. Some of these responsibilities may continue to apply when we are not at work. Conflicts of interest arise where there is a conflict between the performance of AWC employment duties and private or personal interests. Conflicts may involve personal, financial or political interests and may be perceived, potential or actual, compromising your ability to make impartial business decisions.

Conflict situations may result from the holding of business interests, secondary employment, family or personal relationships, private affiliations, sponsorship and the receipt of gifts and benefits. A potential conflict exists when a decision you make could be seen to provide you, an associate, or member of your family with an improper gain or benefit. All business transactions must be conducted solely in the best interests of AWC.

Within our operations there will be situations whereby people are working with family members or people they have formed close relationships with. This can give rise to added complexity within the workplace or conflict of interest.

We must all be alert to be able to identify, declare and manage conflicts of interest. You must not unduly favour a relative or person you know when you are:

- involved in the decision of selection, appointment, or promotion of that person; or
- in a supervisory relationship to that person and are responsible for employment/ volunteer related decisions.

Any matters that arise will be addressed by the next level Manager.

You must advise your Manager and the Human Resources Manager immediately if you become aware of an actual or potential conflict of interest. They will work with you to address the circumstance in a way that eliminates or mitigates the risk of conflict of interest. If you are in doubt about whether a conflict of interest exists, you should discuss the issue with your manager so that it can be properly considered.

Accepting or Offering Gifts

To support the integrity of AWC, care must be exercised when accepting or offering gifts, discounts or hospitality (including meals, entertainment, travel and accommodation), in the ordinary course of business. Such exchanges may compromise – or appear to compromise – the exercise of objective and independent judgement.

In dealing with gifts, discounts or hospitality, you:

- must not offer or accept personal gifts, discounts or hospitality, if it may compromise or appear to compromise the exercise of objective and independent judgement when making a business decision;
- may offer or accept personal gifts of nominal value, where these are token, seasonal or due to a special occasion; and
- may offer and accept occasional business related meals and entertainment with AWC suppliers or potential suppliers, where the value of this is in line with the procurement policy.

For AWC employees:

- All received gifts of value of \$150 or greater, (including business related meals and entertainment), must be declared and noted in the “Gift Register” held by the Chief Financial Officer.

6. Use the resources of AWC in a responsible and accountable manner

We must use the resources of AWC entrusted to us with diligence, efficiency (avoiding waste), carefully and lawfully, including office facilities, vehicles, and other AWC equipment and property. We all have a responsibility to protect AWC’s property under our control, and do as much as possible to safeguard it from loss, theft and unauthorised use.

AWC resources must not be used for private purposes, unless approved.

AWC policies in purchasing must be followed for any goods and services required for AWC operations, and you are accountable for expenditure.

7. Comply with all applicable laws, policies, procedures and directions

AWC is committed to compliance with all applicable laws and regulations. These can relate to, for example, health and safety, the environment, employment, accounting, taxation, contractor works and intellectual property.

We must all:

- comply with the content and spirit of the laws and regulations relevant to our work;
- not engage in fraud and corruption. Fraud is a dishonest activity that causes actual or potential financial loss to any person or body. Corrupt conduct occurs when personnel use or attempt to use their position for personal advantage or advantage to friends or family;
- act within specified authority applicable to our role; and
- seek advice from our managers when we are uncertain about the application or interpretation of laws and regulations that may apply to them.

Breaches of the law may have serious consequences, including civil and criminal action against the individual and or AWC.

8. Only speak on behalf of AWC if expressly authorised to do so

No statements are to be made to the public or the media about AWC unless authorised by the AWC Board or Chief Executive. If a journalist contacts you directly, politely explain that the Communications Manager handles all media queries in the first instance, and offer to get the Communications Manager to return their call. This approach:

- prevents people from being pressured into going on the record without having the chance to check facts, and to prepare a properly considered response;
- ensures the right person is responding;
- ensures a consistent message to all third parties who may have similar queries.

Conduct in social media, either on behalf of AWC or as individuals in your own time, carries risks that may potentially negatively impact upon AWC if not managed properly. For this reason, apart from a limited group of people who have explicit permission to represent AWC in social media forums, you must not lead others to believe they are commenting on behalf of, or in the name of AWC. Where you comment or share information on a subject that could be construed to be related to AWC you need to disclose your professional relationship with AWC and provide a clear disclaimer that your views are your own and in no way represent those of AWC.

At all times be mindful that the information posted or distributed on social media sites could be subject to public scrutiny so refrain from posting information regarding AWC and our business activities that may be construed negatively.

9. Encourage indigenous participation

AWC is committed to being an active part of communities in which we work, especially in remote and regional areas, and to enhancing opportunities for indigenous people to participate in our activities. To continue engaging with indigenous communities, we will:

- respect existing social structures that are present within the communities in which we work;
- respect local indigenous knowledge and aspirations;
- respect the cultural heritage value of indigenous communities who may be affected by our activities; and
- respect and recognise local indigenous customary needs.

10. Respect and maintain privacy, confidentiality of information and accuracy of business records

At AWC you may come across or be privy to confidential information such as technical, strategic, personal or financial information, commercial arrangements or intellectual property.

We must all:

- use confidential information solely for the purposes of our duties;
- preserve the confidentiality of AWC confidential information and ensure that it is not disclosed, except on a need to know basis to others at AWC or authorised recipients, or as required by law; and
- not use or modify any confidential information for our own or a third party's interest or benefit.

These confidentiality obligations continue even after you have left AWC.

Privacy Obligations

All personal information that is collected must be used, stored, handled and updated in line with AWC's Privacy Policy.

Business records

We must ensure that we accurately and rigorously maintain all records relating to AWC business and its operations.

Management responsibilities

Managers and supervisors have a responsibility to:

- Ensure everyone who performs work at AWC or engages in an AWC approved activity including directors, employees, contractors, consultants, volunteers,

students and researchers are aware of, and have access to this Code, and its contents are included in all inductions;

- monitor the working environment to ensure this Code is being complied with;
- model appropriate behaviour consistent with the Code;
- effectively manage people to support them in executing their duties to the best of their abilities; and
- treat complaints seriously and take steps to resolve them in accordance with this Code, the Grievance Handling Procedure, or the Whistleblower Policy (as applicable) and other relevant policies. Where a complaint is found to be vexatious, or frivolous, AWC may take disciplinary action against that person.

Reporting a potential breach of this Code

The Board of AWC has established the Conduct Standards Committee (**Committee**) which, together with the Chair of the Board, has oversight for ensuring that appropriate policies and processes are in place so that complaints can be properly addressed, and individuals have reporting options to raise concerns and make complaints.

If you believe that a potential breach of this Code has occurred or may occur, you can report the matter to your immediate manager or AWC's Human Resources Manager under the Grievance Handling Procedure, or a report can be made under the Whistleblower Policy. Potential Breach Reporting Checklist:

- Make sure you have all the facts.
- Record date, time and location details of the potential breach.
- Provide details of the potential breach with names and details of the event.
- Check if there are any other witnesses who may support your report.
- Identify the location of any equipment or materials that are relevant to the event.

Importance of Confidentiality

Reports of potential breaches of the Code are serious matters and may reflect adversely on the reputation of the person the complaint is made against. Accordingly, complaints must be dealt with in the utmost professional and confidential manner in accordance with the Grievance Handling Procedure or Whistleblower Policy (as applicable).

Information concerning a complaint that is made in good faith must only be discussed with other authorised people involved in the particular case on a strictly "need to know" basis for the purposes of conducting the investigation, except where disclosure is required by law. The person responsible for coordinating the investigation will determine who is to be involved, in consultation with the person who has made the complaint where appropriate.

All witnesses interviewed in connection with an investigation will be notified to keep the matter strictly confidential. Any person attempting to reveal any information about the investigation (including its existence) to any other person may be subject to disciplinary action.

The Whistleblower Policy also provides for high level reporting of the number and type of whistleblower complaints will be made to the Committee and the AWC Board, on a “no names” basis. Serious or material matters may be investigated by, or referred in more detail to the Committee and the Board, as appropriate. Certain information may also be required to be disclosed to auditors, advisers and insurers of AWC.

Procedures for dealing with disclosure required by law

Some forms of conduct that may be reported under this Code may constitute criminal conduct or require investigation by regulatory authorities. While AWC is committed to treat most complaints at an organisational level so far as reasonably possible, this type of conduct is not usually suited to internal process. Often, such complaints should be referred to the police or regulatory bodies, and this option may be discussed with the person making the complaint. In some cases, AWC will be obliged by law to report matters to the police or other regulatory bodies.

Consequences of a breach

This Code has the full support of the AWC Board, and compliance with the Code is taken very seriously. Any person found to have acted in breach of the Code is likely to face disciplinary action up to and including termination of their employment, contractor or other agreement, and removal from site (as applicable).. You should also be aware that you could be subject to external legal proceedings including significant penalties and criminal prosecution should your behaviour breach any relevant legislation.

Other Relevant Policies

- Equal Employment Opportunity
- Harassment, Bullying & Discrimination
- Grievance Handling Procedure
- Privacy Policy
- Procurement Policy
- Whistleblower Policy
- Occupational Health and Safety Policy

Revision History (show last 3 revisions only)

Rev:	Date:	Pages affected:	Description:	Prepared By:	Reviewed by:	Approved by:
1	August 2018		Issued for use	M. Tarrant	Tim Allard André van Boheemen John Kanowski Ruth Cairns AWC Board	Tim Allard