



<u>Policy Approver:</u>	Board
<u>Policy Owner:</u>	Chief Executive Officer
<u>Policy Lead:</u>	Head of People and Property
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Code of Conduct

WWF-Australia acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of Country, Sky and Saltwater throughout Australia. We pay our respects to Elders past and present, and recognise the deep knowledge, cultural authority and continuing connection to Country that is central to the conservation and healing work we share.

This Code of Conduct applies to everyone at WWF-Australia, including directors, employees, interns, students on vocational placement, volunteers and independent contractors and consultants, and all official visitors to our offices, project sites or activities. It sets out our shared commitment to ethical behaviour and provides guidance on what to do if something doesn't feel right.

Note: People working for partner organisations do not usually need to sign this Code unless specifically requested.

1. Living Our Values, Everywhere

This Code applies for the duration of my relationship with WWF-Australia. When that relationship ends, so do my obligations under this Code – unless a specific obligation continues by law or agreement.

I acknowledge that this Code applies to me at all times, whenever a connection – direct or indirect – can be made with WWF-Australia, in both professional and personal settings. This includes:

- At the workplace – in the office, when working remotely or while participating in or visiting WWF-Australia activities or sites.
- At work-related events – conferences, meetings, fieldwork, functions and donor events.
- Online or on social media – including my personal accounts, if a connection can be made to WWF-Australia.
- In any public setting where my behaviour could cause harm or affect WWF-Australia's reputation.

For WWF-Australia personnel, this Code also applies off duty whenever a connection can be made with WWF-Australia. This includes, but is not limited to:

- Posting on social media about work, work activities or colleagues (including on personal accounts).

- Using a WWF-Australia-issued device (e.g. laptop or phone) to browse websites or watch videos.
- Appearing in public with WWF-Australia merchandise (e.g. wearing a t-shirt with the panda logo).
- Socialising with colleagues outside of work where my connection with WWF-Australia is apparent.

I acknowledge that the safeguarding expectations in this Code apply at all times, including off duty, even where no connection to WWF-Australia can be made. See 'My Safeguarding Commitments' below.

2. Key Terms Used in This Code

Please see the glossary at the end of this Code for definitions of important terms.

3. Our Values

I am committed to upholding WWF's shared values of integrity, collaboration, courage and respect:

- **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.*
- **Collaboration:** *We deliver impact at the scale of the challenges we face through the power of collective action and innovation.*
- **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.*
- **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.*

4. What I Stand For

Respect and Dignity

- I treat all people with respect, upholding their rights, dignity and wellbeing.
- I use appropriate, respectful language and behaviour at all times, including when speaking about other people and organisations who are not present.
- I respect cultural sensitivities, local customs and traditions.
- I am mindful of power imbalances and take steps to address them.
- I act in the best interests of children and other people in vulnerable situations.

Safety and Wellbeing

- I contribute to a safe workplace that promotes health, safety, security and wellbeing for all personnel, partners and visitors.
- I speak up and take action if I see something that could harm myself or others.
- I do not accept or ignore harassment, discrimination, bullying, abuse, exploitation, neglect or any form of disrespectful behaviour.
- I do not work if alcohol or other substances could affect my safety and professionalism.

Human Rights and Social Inclusion

- I respect and promote internationally recognised human rights, including the right to a safe, clean, healthy and sustainable environment.
- I promote approaches to conservation that support the rights and aspirations of people involved in or affected by our work, and identify and address potential and actual negative human rights impacts.
- I take particular care to prevent harm to people and communities who may be marginalised or vulnerable.

Responsible Use of Resources

- I use WWF-Australia's money, equipment and resources responsibly and respect others' time.
- I act honestly and provide accurate, timely information in my work.
- I do not engage in fraud, corruption, money laundering or terrorism financing.
- I respect confidentiality during and after my employment or engagement, and only share sensitive or non-public information when authorised.
- I deliver high-quality, effective work and manage risks in line with WWF-Australia's risk appetite.
- I take steps to minimise the environmental impact of work, including travel.

Integrity and Representation

- I follow this Code and recognise that my behaviour may reflect on WWF-Australia's reputation.
- I am careful about what I share publicly, including on social media, and I only speak on WWF-Australia's behalf when I am authorised to do so.
- I speak up about risks or concerns through appropriate internal channels and exercise good judgement before making public comment about WWF-Australia.
- I comply with the law of the country I am in and with this Code. Where there may be a conflict, the higher standard will apply.
- I take reasonable steps to avoid conflicts of interest and disclose any conflicts (real, potential, or perceived) in accordance with WWF-Australia's Conflicts of Interest Policy (*personnel only*).

- I use good judgement when offered gifts, and declare substantial gifts as required (*personnel only*).
- I respect Australian and local privacy laws and intellectual property laws.

5. Expected Safeguarding Behaviours

I understand that the expected safeguarding behaviours below apply to me at all times — whether I am on or off duty, and regardless of whether any connection, direct or indirect, can be made with WWF-Australia. There is **no circumstance** in which harmful behaviour towards a child or person in a vulnerable situation is acceptable.

Zero-Tolerance Behaviours

- I will never engage in any form of child abuse. This includes child sexual abuse, child physical abuse, child emotional abuse, child neglect, child exploitation, and physical punishment or discipline of children.
- I will never engage in any form of sexual exploitation, abuse or harassment of any person. This includes sexual abuse or harassment, physical violence, emotional abuse, and/or neglect.
- I will never exploit any child or person in a vulnerable situation in any way. This means I will never expose them to pornography, grooming, trafficking or using them for inappropriate labour or personal gain.
- I will never enter into a sexual or intimate relationship with someone in a vulnerable situation. I understand that any such relationship, including any sexual conduct or activity with children (regardless of local age of consent), transactional sex (exchanging money, goods, or services for sexual acts), or any fraternisation that could lead to favouritism or misuse of power, is strictly forbidden.
- I will never abuse my position or authority. I will not solicit personal favours, payments or benefits through my role, and will never provide children or people in vulnerable situations with alcohol, drugs or inappropriate gifts.

Safe Interactions with Children and People in Vulnerable Situations

- I will avoid unnecessary and inappropriate physical contact with children or other people in vulnerable situations, including unsupervised, secretive or coercive contact.
- I will ensure that any contact with children is observable and takes place in an open environment with another adult present, with appropriate safeguards in place and always acting in the child's best interest.
- I never invite unaccompanied children or other people in vulnerable situations into private residences (unless there is immediate risk of danger or harm), and do not contact them outside designated program or activity times.

Safeguarding Measures

- I comply with WWF-Australia's Safeguarding Policy and follow all safeguarding requirements put in place for activities, including participating in all required safeguarding screening, training and supervision arrangements
- I work to identify, assess, manage and mitigate potential risks to children and other people in vulnerable situations in all activities
- I comply with all applicable Australian and local laws, especially those related to the protection of children and people in vulnerable situations

Digital Safety and Online Conduct

- I never use any smart devices (such as computers, mobile phones, video cameras or cameras) or digital platforms to exploit, harass or cause harm to any person, particularly children and other people in vulnerable situations
- I do not access, possess, produce or distribute exploitation or other inappropriate material through any medium
- My electronic communications with children or people in vulnerable situations related to WWF-Australia's work are appropriate, transparent and authorised, occur only through approved WWF-Australia systems, platforms and accounts, and never involve private, unmonitored or unauthorised channels, including personal devices or accounts
- I collect, process and share data regarding children and people in vulnerable situations only when I am authorised to do so and always in accordance with applicable privacy and safeguarding requirements
- I report any concerns about online safety or inappropriate use of technology

Ethical Use of Images and Personal Information

- I comply with local traditions, restrictions and applicable privacy requirements when collecting, processing or sharing personal images and information
- Before photographing, filming or developing stories of children or people in vulnerable situations, I obtain ongoing, prior, informed consent from the individual (and written or recorded consent from a child's parent or guardian where applicable) by using official WWF-Australia consent forms and tools, age-appropriate communication and explaining how the material will be used. I ensure records of consent are kept up-to-date and safely secured in accordance with privacy requirements.
- I ensure all images, videos and stories portray children and people in vulnerable situations in a dignified, respectful and honest manner, and never in a submissive, vulnerable or sexually suggestive way.
- Before sharing or publishing any image or content, I check that no identifying details (such as names, locations or GPS data) are visible in file names, metadata or accompanying text.

6. Reporting Requirements

- I will contact local emergency services (000 in Australia) if someone is at immediate risk of harm.

- I will speak up and report any concern, including breaches of this Code, safety risks, financial irregularities, privacy risks, safeguarding concerns, or any retaliation or victimisation through the appropriate channels, including those listed in the Safeguarding Policy, Whistleblower Policy, Complaints Policy, Privacy Policy and/or other relevant policies.
- I understand it is my responsibility to report concerns and do not assume others will act. For safeguarding concerns, I report within 24 hours.
- I promptly disclose to WWF-Australia any charge, conviction, investigation or disciplinary finding related to my conduct, including any matter that occurred before my engagement with WWF-Australia.
- I will cooperate fully with any investigation.
- I will seek guidance from my line manager, WWF-Australia's Safeguarding Focal Point, or my key contact at WWF-Australia if I'm not sure what to do – asking is always the right first step.

7. Consequences of Breaching This Code

A breach of this Code may result in:

- **For WWF-Australia personnel:** disciplinary action, up to and including termination of employment or engagement, and referral to police or authorities where appropriate.
- **For official visitors:** end of engagement, removal from sites or activities, reporting to their employing or sponsoring organisation, and referral to police or authorities where appropriate.

8. Declaration & Acknowledgement

By signing this declaration, I confirm and accept that I have read, understood and commit to this Code, including the safeguarding commitments within it.

Full Legal Name _____
Organisation _____
Role _____
Signature _____
Date _____

Note: This declaration must be signed by:

- **all WWF-Australia personnel:** upon commencement and renewed annually
- **all official visitors:** prior to or at the commencement of the visit or engagement

Key Terms – What These Words Mean in This Code

This section provides plain-language definitions of key terms used in this Code.

- By **‘activities and work’**, we mean our programs and projects and other activities resourced by WWF-Australia (such as funding or in-kind support).
- By **“child”** and **“children”**, we mean any person under the age of 18, regardless of local laws on the age of majority.
- By **“child exploitation, abuse and harm”**, we mean any act against or involving a child that constitutes physical, sexual, emotional or online/digital abuse, ill-treatment or neglect; grooming (including online grooming); trafficking, child labour or forced labour; child marriage; female genital mutilation; possessing, controlling, producing, distributing, obtaining or transmitting child exploitation material; using a child for profit, sexual gratification or any other personal or financial advantage; or coercing another person to commit any of the above. It also includes a child witnessing any such conduct against another child or adult.
- By **“conflict of interest”**, we mean a situation where your personal interests, relationships or outside activities could, or could appear to influence your professional judgement or decisions at WWF-Australia. Conflicts can be real, potential or perceived. Detailed definition can be found in WWF-Australia’s Conflicts of Interest Policy.
- By **“fraternisation”**, we mean any intimate or social relationship that occurs in the course of conducting business and could involve, or appear to involve, partiality, preferential treatment or misuse of power. Where power imbalances exist, fraternisation may constitute sexual exploitation.
- By **“grooming”**, we mean behaviour designed to build trust with a child or person in a vulnerable situation (or their family/community) for the purpose of exploitation or abuse. Grooming can happen in person or online and may not be immediately obvious.
- By **“harm”**, we mean any detrimental effect on an individual’s physical, psychological or emotional wellbeing. Harm may be caused by financial, physical or emotional abuse, neglect and/or sexual abuse, sexual exploitation, or other conduct, whether intended or unintended.
- By **“modern slavery”**, we mean any conduct constituting modern slavery under applicable modern slavery laws, including the *Modern Slavery Act 2018* (Cth). This includes slavery, servitude, forced labour, human trafficking, debt bondage, forced marriage and deceptive recruiting, and the worst forms of child labour.
- By **“official visitor”** we mean a person 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.
- By **“partner organisation”** we mean an organisation that is directly responsible for undertaking conservation, regeneration and/or aid and development activities and work resourced by WWF-Australia.

- By “**personnel**”, we mean our Board directors, employees, interns, students on vocational placement, volunteers and independent contractors or consultants.
- By “**power imbalance**”, we mean a situation where one person holds more authority, influence, resources or status than another — for example, due to their role, age, gender, economic position or cultural context. Power imbalances can increase the risk of exploitation or harm.
- By “**PSEAH**”, we mean the protection from sexual exploitation, abuse and harassment, or SEAH, which includes both prevention and response.
- By “**safeguarding**”, we mean the actions we take to protect children and other people in vulnerable situations from exploitation, abuse, harassment and harm, and to prevent these things from happening in the first place.
- By “**Safeguarding Focal Point**”, we mean the person at WWF-Australia responsible for overseeing safeguarding day-to-day, including receiving and managing reports, coordinating responses, and supporting training and compliance. Currently, this is the Chief Legal, Risk & Sustainability Officer.
- By “**sexual exploitation, abuse and harassment**” or “**SEAH**”, we mean one or more of the following actions:
 - **Sexual exploitation**: any actual or attempted action to use a position of power, trust or vulnerability for sexual purposes, including for monetary, social or political gain.
 - **Sexual abuse**: any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes all forms of sexual assault and other non-consensual sexual activity.
 - **Sexual harassment**: any unwelcome conduct of a sexual nature where a reasonable person would anticipate the person being harassed might feel offended, humiliated or intimidated. It can be a one-off incident or repeated, and can occur in person, over the phone or online. It can be physical, verbal or non-verbal.
- By “**transactional sex**”, we mean the exchange of money, employment, goods, services or other benefits for sex or sexual acts. A person can be sexually exploited through transactional sex even where sex work is legal.
- By “**victimisation**”, we mean conduct that causes or intends to cause detriment to a person because that person has made, is suspected of having made, or plans to make a complaint or provide information or evidence about a complaint.
- By “**victim-survivor**”, we mean an individual who is, or has been, sexually exploited, abused or harassed, or who has experienced child exploitation, abuse or harm. The term ‘victim-survivor’ acknowledges both the harm suffered (victim) and the resilience or agency of the individual in coping with the aftermath (survivor).
- By “**volunteer**”, we mean an individual who is formally engaged by WWF-Australia to willingly give their time without financial gain (other than reimbursement of reasonable out-of-pocket expenses), and who performs activities on behalf of and

under the direction of WWF-Australia. Volunteers are not employees, independent contractors or consultants of WWF-Australia. This definition does not include individuals participating in corporate, group or ad hoc volunteering activities unless they are formally engaged as volunteers by WWF-Australia. This policy applies to volunteers only to the extent that its requirements are relevant to their volunteering activities for WWF-Australia.

- By a person or people in a “**vulnerable situation**”, we mean a person who may be at increased risk of harm or exploitation due to their circumstances, identity, or situation. Vulnerability is not inherent in any individual, it arises from context, including social norms, behaviours and attitudes towards factors such as age, gender, gender identity, sexual orientation, race, ethnicity, disability, socio-economic status, displacement or systemic marginalisation, as well as situations of dependency, unequal power, or inability to protect oneself from harm. All children are considered to be in a vulnerable situation.