The Nature Conservancy

Code of Conduct

People and Nature Thrive When We...

© FLORIAN LEDOUX /TNC PHOTO CONTEST 2019 *Aerial view of people enjoying kayaking in pure and pristine landscapes of Antarctica.*

DOWNLOAD OUR CODE OF CONDUCT IN ADDITIONAL LANGUAGES:

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© **DARRELL BODNAR** *Nature in New Hampshire, USA.*

© **DEV KHALSA** *Jennifer Morris, The Nature Conservancy's Chief Executive Officer.*

A MESSAGE FROM

Our CEO on The Nature Conservancy's Code of Conduct

Every day we are working to put nature, our ecosystems and our communities first. As we navigate our work, it is critical to conduct ourselves in a way that upholds the TNC Values and strengthens our culture and our reputation.

Since 1951, The Nature Conservancy has worked together with scientists, communities, nonprofits and leaders from government and industry to protect the land and waters on which all life depends.

Today we are a global organization with a large, vibrant network of staff, volunteers and supporters from around the world. This dedicated network plays a critical role in helping TNC achieve our important mission.

Collaboration is our strongest lever to create lasting progress for our planet. To work effectively with each other we must start from a baseline of trust. TNC seeks to cultivate a productive, safe and inclusive work environment, where our team members can thrive and work effectively with each other and with our partners.

Our Code of Conduct is a tool to maintain trust. The Code guides actions and decisions to ensure that we all do our critical work with integrity beyond reproach and treat each other with dignity and respect. It is an extension of the TNC Values and provides clear examples of how we can live our Values every day. It also gives us the framework to hold people accountable in an effective and equitable way.

I believe in the TNC community—I believe we forge a more sustainable path and brighter future for our shared planet. Using this Code of Conduct as our guide, together we can create a world where people and nature thrive.

Sincerely,

Jennifer Morris
Chief Executive Officer

© **JENNA SCHOENEFELD**
View of Loop Ranch in Keene, CA, USA.

A NOTE FROM

Our Ethics & Compliance Team

It is a privilege to work at an organization with a mission we can stand behind and be proud of. Many of us joined The Nature Conservancy because we feel the urgency to protect the lands and waters on which all life depends. We also believe strongly that the TNC Values—especially Integrity Beyond Reproach—are not just words on a page, but rather principles that guide us in all we do—every day and everywhere we operate. We are committed to meeting the highest ethical and professional standards in all our actions. By doing so, we build the trust we need to be effective in our work, we are accountable to our mission, each other, our donors and our partners, and we reinforce our ethical culture.

Sometimes how to act with integrity is not always clear. This Code is a policy and a guide to assist us in making ethical decisions and to hold ourselves and each other accountable. Look for quick navigation links to each section of the Code at the top of each page and for icons at the bottom of each page that link to additional resources on a topic, such as a policy, standard operating procedure (SOP), quick guide or CONNECT page.

Our team is also a resource to help navigate challenging situations and ethical dilemmas that might arise in our work. We know it takes courage to speak up. TNC will not tolerate retaliation in violation of law or our policies against individuals who ask questions, raise good-faith concerns about potential misconduct or cooperate with an internal investigation. You can ask a question or report a concern through our Helpline, **www.nature.org/tnchelpline**, or contact us directly at **compliance@tnc.org**. Look for a link to TNC's Helpline on each page of the Code.

It takes each of us to foster and maintain an ethical culture, and every one of us can be an ethical leader, regardless of title or tenure. ***An ethical leader:***

- Makes decisions and acts in accordance with our Values and Code of Conduct.
- Seeks guidance from Ethics & Compliance when needed.
- Praises colleagues who model ethical behavior and holds accountable those who do not.
- Watches for and helps prevent retaliation in violation of law or our policies.
- Encourages learning and a learning mindset and completes required training on time.

If you are a people manager, you are additionally expected to:

- Have an open-door policy and foster a connection with the staff you serve.
- Support staff in completing required training on time.

Thank you for your commitment to our culture of integrity, trust and accountability.

Our Speak-Up Culture

At The Nature Conservancy, people and nature thrive when we seek guidance whenever we have questions and speak up if we have concerns.

We are all responsible for speaking up if something does not feel right or if we have concerns about ethical misconduct, including if we witness inappropriate behavior or violations of our policies and SOPs.

Misconduct can happen anywhere, even at an organization that takes ethics and compliance seriously. When we speak up early, we can help address an issue before it becomes a problem and mitigate any potential damage.

HOW DO I SPEAK UP?

There are many people and resources at TNC for you to reach out to if you want to ask a question or report a concern about potential misconduct. ***As an employee you can contact:***

- Your manager
- Another TNC supervisor
- A member of the People Team *(either Human Resources or Employee Relations and Engagement)*
- A member of the Ethics & Compliance team.

You may also submit a question or concern through TNC's Helpline, **www.nature.org/tnchelpline,** which is available online or by phone 24 hours a day, seven days a week, in 60+ languages. If you call the TNC Helpline, you will speak with a third-party agent who will document the concern and confidentially forward it to Ethics & Compliance. If you submit a question or concern online, it goes directly to Ethics & Compliance. Questions and concerns may be submitted anonymously via the TNC Helpline in most countries in which TNC operates.

External parties may also submit questions and concerns through the TNC Helpline.

WHAT CAN I EXPECT IF I ASK A QUESTION OR MAKE A REPORT?

We will take your concern seriously. TNC will not tolerate retaliation in violation of law or our policies against any individual or group of individuals who asks a question, raises a concern about potential misconduct in good faith or cooperates with an internal investigation. Everyone at TNC has the obligation to speak up if they believe that an individual or group of people is experiencing retaliation.

Retaliation comes in many different forms and can be overt or subtle. It can range from demoting someone or discouraging someone from seeking a promotion, to verbal harassment and intimidation, to more subtle behavior such as underutilizing someone who is capable of more significant contributions, providing someone with fewer opportunities for professional development or excluding someone from a meeting or group outing. If we find evidence of retaliation due to the raising of a protected concern or cooperation with a TNC investigation, we will discipline the retaliator, up to and including termination.

It takes courage to speak up. We show our commitment to our Values by supporting each other when issues and concerns arise and by holding individuals accountable for behaving inconsistently with our Values or violating this Code or any of our policies or SOPs. This also means taking disciplinary action against anyone who reports a concern in bad faith or otherwise misuses our reporting system or undermines our speak-up culture.

MAKING DIFFICULT DECISIONS

There may be times when we have a decision to make but the right choice is not completely clear. ***In these situations, it can be helpful to think through the following questions:***

- Does it comply with the law and with our Code, policies and SOPs?
- Is it consistent with our Values?
- Does it preserve our reputation?
- Are we being honest and fair?
- Would I feel comfortable telling my family and friends about my decision?
- Would I feel comfortable if a news outlet reported on this situation?

People and Nature Thrive When We...

COMMIT *to Our Values*

- INTEGRITY BEYOND REPROACH
- RESPECT FOR PEOPLE, COMMUNITIES AND CULTURES
- COMMITMENT TO BELONGING
- ONE CONSERVANCY
- TANGIBLE, LASTING RESULTS

Our Values shape who we are as an organization and how we conduct ourselves as individuals. They inspire us to do the right thing and to do right by one another. This Code provides guidance as we conduct our daily work on behalf of TNC. It does not give specific information on all our policies and SOPs, nor on all the laws, rules and regulations with which we must comply. Instead, it provides expectations around ethical behavior that apply to all of us in the course of our work for TNC.

UNDERSTAND *Our Responsibilities*

The Code applies worldwide to all TNC staff, board members, trustees, donors, partners and volunteers in all TNC programs, business units and affiliates when working for or with TNC. Everyone acting on behalf of TNC must comply with this Code, as well as all applicable laws, rules, regulations, policies and SOPs. We expect partners and other external parties with whom we do business to conduct themselves consistently with our Code. In geographies where our policies, SOPs and Values are stricter than the local laws and customs, those of us who work for or with TNC will be held to the higher standards set forth in that guidance and in this Code.

This Code applies to all of us. It matters to everyone, and when we find violations, we hold individuals accountable.

© IAN SHIVE *Portrait of Sam 'Ohukani'ōhi' a Gon III, Senior Scientist and Cultural Advisor at the Nature Conservancy, Hawai'i Program, Maunawili Falls Trail, Oíahu, Hawai'i, USA.*

© **JEROD FOSTER** *Conservancy staff members Sonia Najera and Aaron Tjelmeland review preserve plans. The Brazos River Preserve is 176 acres and located in Brazoria County, Texas, USA along the river. The Columbia Bottomlands-Brazos River Project seeks to bring public and private partners together to conserve the river and the abundant life it supports.*

Respect Each Other

PEOPLE AND NATURE THRIVE WHEN WE...

BEHAVE *Professionally and Respectfully*

At TNC, we understand that the way we behave drives the ultimate success of our mission. We do our best work when we treat one another with respect. TNC will not tolerate unprofessional behavior, harassment, bullying or mistreatment in our workplace—no matter where we are or what we do for the organization. That expectation extends to events, field work, social outings and other activities, such as social media, in which we may be involved on behalf of TNC.

AT TNC, WE...

- Treat every person with ***consideration, professionalism and respect.***
- Behave appropriately and ***speak up*** if we see inappropriate behavior.
- ***Think*** about how our actions impact others and ***learn to recognize*** and ***learn*** from our differences.

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VALUES IN ACTION

TNC is committed to a workplace where everyone is treated with dignity, courtesy, and respect. Unprofessional and disrespectful behavior, including sexual harassment, can disrupt our workplace, interfere with achieving our mission and impact personal health. Sexual harassment as defined by TNC policy is unwelcome conduct of a sexual nature that a person finds insulting, offensive or threatening and can be verbal or non-verbal, overt or subtle.

Some examples of unprofessional and disrespectful behavior (which includes conduct that would qualify as sexual harassment under TNC policy) include any of the following in the workplace or at work-related events or outings:

- Verbal or non-verbal conduct that intimidates, threatens, humiliates or demeans another person.
- Actions or statements that exclude or divide people because of their differences.
- Sending or discussing inappropriate emails, pictures or text/chat messages.
- Excessive alcohol consumption.
- Spreading gossip or rumors.
- Unwelcome physical contact or physical intimidation.
- Jokes or conversations that include sexual innuendo.
- Repeated unwelcome requests to spend time out of the office together.
- Demanding sexual relations in exchange for professional opportunities or other favors.

© **TIM CALVER** *Berna Gorong, TNC Partnership and Communications Coordinator for Micronesia, participates in the Women Leading Climate Action Workshop at the Tamil Men's House in Yap, Federated States of Micronesia.*

PEOPLE AND NATURE THRIVE WHEN WE...

COMMIT *to a Culture of Belonging*

Our success and innovation depend on our ability to lean into our differences and learn from one another. We treat everyone with respect, and we recognize that everyone brings varying perspectives and experiences to our work and interactions.

AT TNC, WE...

- Are ***inclusive of all people***.
- Make employment decisions based on an individual's ***credentials***, ***skills*** and ***experience***.
- Continually ***engage with one another*** and our partners in thoughtful, intentional and meaningful ways.

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VALUES IN ACTION

Our differences make us stronger and often enable us to work more effectively together. Approaching differences as opportunities while assuring inclusion is important when we work together as colleagues. It is equally important when our work extends beyond the walls of TNC to the world around us, from the communities we serve to the donors and partners who support us.

Our Values and policies are designed to protect individuals from being discriminated against based on personal characteristics such as race, color, national or regional origin, religion, age, ability, sex or gender identity, sexual orientation or military or veteran status.

We deepen our commitment to belonging at TNC by:

- Engaging with our Employee Resource Groups that provide community for staff and opportunities to network and share stories.
- Communicating authentically and effectively with one another in a respectful manner.
- Creating a workplace where everyone is welcome and is valued for their contributions.
- Participating in workshops and trainings that raise our awareness of how to effectively engage across differences.
- Recognizing and honoring the holidays and cultural observances of colleagues.

© **SIRSENDU GAYEN/TNC** *Photo Contest 2021. Loktak Lake, one of the largest freshwater lakes in the entire world, is situated at Manipur. The lake has provided these people with food, water, occupation, shelter and above all sustenance.*

PEOPLE AND NATURE THRIVE WHEN WE...

ENGAGE *in Quality Conversations*

A quality conversation is a meaningful and mutually rewarding dialogue that creates connection and establishes trust. When we improve the quality of conversation, we improve relationships, innovation and results. We commit to approaching conversations with curiosity, ready to learn from different perspectives so that we make the best, most informed decisions.

AT TNC, WE...

- ***Listen to understand*** rather than only to agree, disagree or fix.
- Demonstrate respect for others by ***sharing appropriate, relevant information***.
- Cultivate an ***open mind*** and a ***willingness to learn*** about and from the experiences and points of view of others.
- Focus on ***facts***, ***common goals*** and our shared TNC Values to improve connection, prioritize productivity and accelerate progress.
- Recognize and respect our ***different communication styles*** and ways of understanding based on our experiences, organizational roles and professional backgrounds.

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VALUES IN ACTION

We all have preferences for how we communicate. Some of these may be based on culture. Some people prefer written communication, and some prefer oral. Some express their thoughts as they occur to them, and some would rather formulate their thoughts before communicating. Some are straightforward and direct, while others rely on indirect communication and quiet listening.

Notice what your communication style is, as well as whether it changes depending on context. Then notice the communication styles of the colleagues you work most closely with. Use your observations to foster quality conversations.

© **AMI VITALE** *The Nature Conservancy's Agriculture officer, Clement Mabula, teaches a group of farmers sustainable agriculture methods near Lake Tanganyika in the village of Mgambo, Tanzania. Lake Tanganyika holds nearly one-fifth of the world's freshwater, is the world's second largest lake by volume, and is home to 250 endemic species of fish. It provides 40% of all protein for lakeshore villages.*

Respect the World Around Us

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT *All Communities*

At TNC, collaboration with local communities is central to our mission. We recognize the importance of the leadership and partnership of local communities, including the Indigenous Peoples who have long stewarded their lands and waters in right relationship with nature. We demonstrate respect for all local populations and cultures, wherever we operate.

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AT TNC, WE...

- Work together across borders and cultures to better understand the challenges we face in the world and to ***collaboratively develop the best solutions*** to solve our challenges.
- Partner with Indigenous Peoples and local communities to ensure that we are ***always respectful*** and that our actions do not create harm.
- ***Avoid situations that could lead to exploitation*** of vulnerable populations.
- Advance ***culturally aware approaches*** in our work.

VALUES IN ACTION

As an example of how TNC operates in line with our Values, TNC respects and promotes Indigenous Peoples' right to self-determination and is committed to seeking and honoring Free, Prior & Informed Consent when engaging with Indigenous Peoples and local communities. Free, Prior & Informed Consent is an ongoing process, founded on trust and achieved through continuous dialogue and information sharing.

When invited, we partner with Indigenous Peoples and local communities to co-create long-term solutions centered on the principles of Voice, Choice and Action. A stronger Voice fosters the inclusion of Indigenous and local knowledge, identity, local priorities and values in plans and solutions. The ability to exercise and influence Choice builds leadership and engagement in decision-making. Greater Action provides the opportunity for communities to initiate and participate in the implementation of programs and the management of resources that impact their well-being both now and in the future.

© **BRIDGET BESAW** *Willibrorbs Djoka (on right), the Nature Conservancy's Protected Area management team member for Wehea and Lesan in the Kalimantan region of Borneo, Indonesia talks with village leader Ledgie Taq at the village of Nehas Liah Bing. The Nature Conservancy is working throughout the Berau district and regionally in East Kalimantan to develop a road map for creating direct economic incentives to maintain the forests.*

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT AND SUPPORT *the Furtherance of Human Rights*

We recognize that our conservation objectives are closely related to the right of all people around the world to secure their livelihoods, enjoy healthy and productive environments, and live with dignity. We respect and support the furtherance of the human rights of all people throughout our operations across the globe. We are committed to a human rights-based approach to conservation. We understand that our goals and mission must never become more important than the rights of the people living in the communities we serve.

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AT TNC, WE...

- Are committed to ***safe workplaces***.
- Treat our staff fairly, protect them from ***exploitation*** and ***abuse*** in our operations and ***comply with applicable labor and employment laws.***
- ***Respect the rights*** of one another and the people in all the communities where we work.
- Design our conservation work with a ***human-centered approach*** to ***safeguard human rights***.
- ***Prohibit child labor, indentured servitude*** and ***slavery*** in our operations.
- ***Build awareness*** for mitigating, preventing and responding to gender-based violence.

VALUES IN ACTION

Just as we are responsible for respecting and furthering human rights in our operations around the world, we must also oversee the actions of those individuals who work on behalf of TNC so their work for us aligns with our commitment to respect human rights. We will not tolerate human rights violations in the name of our conservation work, either by TNC staff or by TNC partners.

Human rights are generally defined as the universal rights and freedoms that are to be enjoyed by all people. Human rights violations range from mistreatment or abuse to exploitation or slavery of individuals or groups. They can also include situations where Indigenous Peoples or other groups are threatened by land encroachment, deprivation of land tenure rights or seizure.

© **DAVID LAURIDSEN** *Solar panels at the Fuller Star plant in Lancaster, California.*

PEOPLE AND NATURE THRIVE WHEN WE...

ACT *Sustainably in Our Work*

Our global reach results in significant carbon emissions from our buildings, our operations and our travel. Operating in an environmentally sustainable way is an important part of our mission. It is also what we expect from ourselves and what our members, donors and partners expect from us. Leading by example is how we inspire others to act sustainably.

AT TNC, WE...

- ***Establish*** sustainability goals.
- Evaluate our carbon footprint in order to ***prioritize our sustainability efforts.***
- Provide practical guidance for actions that we can take to ***improve sustainability*** in areas such as energy and water consumption, meetings and travel, waste and purchasing.
- ***Monitor progress*** and ***adjust our priorities*** as needed to meet our sustainability goals.

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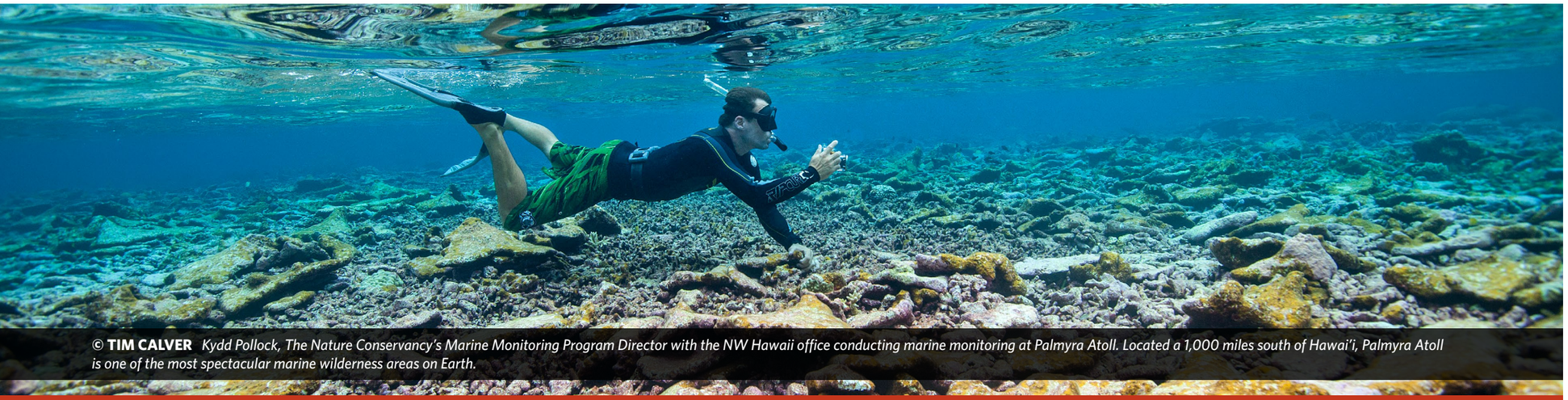
VALUES IN ACTION

We commit to setting science-based emission reduction goals and publicly sharing our progress towards achieving them. We choose to work with individuals and organizations who share our commitment to sustainability and the environment.

We act sustainably and minimize our carbon footprint when we:

- Use renewable sources of energy and work in energy-efficient (LEED-certified) buildings when possible.
- Transition vehicle fleets to electric and hybrid vehicles.
- Choose no- or low-emission modes of commuting.
- Prioritize sustainable waste and composting practices at office facilities.
- Utilize Teams or Zoom instead of travel.
- Select venues near airports with many direct flight options and/or with public transportation to hotels and conference centers.
- Take public transit, when available, or rent electric or hybrid vehicles.
- Select lodging with eco-friendly practices and policies.
- Utilize our global travel management partner to schedule and manage safe and sustainable travel.
- Travel smart by bundling our remote commitments.



© **TIM CALVER** *Kydd Pollock, The Nature Conservancy's Marine Monitoring Program Director with the NW Hawaii office conducting marine monitoring at Palmyra Atoll. Located a 1,000 miles south of Hawai'i, Palmyra Atoll is one of the most spectacular marine wilderness areas on Earth.*

Act with Integrity

PEOPLE AND NATURE THRIVE WHEN WE...

PRESERVE *Our Charitable Status*

Our reputation as a highly respected charitable organization enables us to do the work we do. As a public charity, TNC receives certain benefits that come with important responsibilities. To maintain TNC's tax-exempt status, our work must advance our mission. We take our responsibilities seriously and comply with these standards wherever we work across the globe.

AT TNC, WE...

Avoid advocating for or against a political party or an individual candidate running for public office when we are representing TNC, including at public events and on social media.

Comply with TNC's policies and SOPs on lobbying, which include a limit on the amount of lobbying TNC can do.

Comply with TNC's policies and SOPs on fundraising and ***maintain oversight of any professional fundraisers*** we engage to support our efforts.

Avoid private benefit and private inurement by paying no more than ***fair market value*** for products and services.

Maintain ***complete and accurate books and records*** for auditing and accounting purposes and file all required taxes and corporate reports.

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VALUES IN ACTION

Electioneering refers to the activities politicians and their supporters use to influence voting. While we cannot advocate for or against a political party or an individual candidate in our TNC capacity, we are able to do so in our personal capacity. However, it is important that we do not lead anyone to believe we are speaking on TNC's behalf in any political context.

Steps to take to prevent electioneering:

- Refrain from using any TNC resources (such as email, office supplies, office space or time) to advocate for any party or candidate.
- Do not wear TNC-branded clothing if participating in a political campaign or event.
- When posting political content, include a disclaimer on any personal page stating that the views expressed are personal views and do not represent the views of TNC.

Senior leaders must exercise more care and seek guidance before engaging in political activities.

© **BEN HERNDON** *November 2015, Bekah Herndon canoeing on the still waters of a freshwater pond along the Discovery Trail during a sunny autumn afternoon at the Nags Head Woods Preserve. North Carolina, USA.*

PEOPLE AND NATURE THRIVE WHEN WE...

ACT *as Responsible Stewards of TNC's Financial and Other Resources*

We use TNC's financial and other assets only to further TNC's mission. When our funders contribute to TNC, they trust us to use their gifts and grants cost-effectively to advance our shared goals. We demonstrate accountability to ourselves and to them by using TNC's assets only for legitimate conservation and business purposes, by implementing policies, procedures and controls to ensure that we do so and by maintaining complete and accurate books and records.

AT TNC, WE...

- Act responsibly with our business expenses and are mindful of our commitment to steward our resources by being ***thoughtful in our spending.***
- Submit expense reimbursements only for ***acceptable business costs*** as defined in our SOP and never for personal expenses.
- ***Refrain from using corporate credit cards*** and ***cash advances*** for ***personal expenses.***
- Record diligently how we use funds and comply with all ***accounting*** and ***legal requirements*** that apply to the receipt and use of funds.

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VALUES IN ACTION

Integrity Beyond Reproach means that if we accidentally charge a personal expense to our corporate credit card, we designate it as such and immediately take steps to return the amount to TNC.

It also means we act cautiously and vigilantly if our work involves operations that are at high risk for money laundering and terrorist financing.

To ensure Tangible, Lasting Results we make commitments to donors only if we know that we can keep them and use donor funds in accordance with donor intent.

© **XIANGLI ZHANG/TNC** Dokdo beauty. *Photo Contest 2021.*

PEOPLE AND NATURE THRIVE WHEN WE...

AVOID *Conflicts of Interest*

Conflicts of interest happen when an individual who is responsible for acting in the best interests of TNC has another interest that could influence or impair, or may appear to influence or impair, the individual's ability to do so. We are all responsible for avoiding conflicts of interest and the appearance of conflicts of interest and for disclosing actual, potential and perceived conflicts of interest so that they can be appropriately managed. Our stakeholders, including our donors, rely on us to put TNC's mission first. Avoiding and mitigating conflicts of interest enables us to maintain our reputation as an organization worthy of support.

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AT TNC, WE...

Understand what it means to have a ***conflict of interest*** and are familiar with the most common kinds of conflicts of interest at TNC.

Consult with ***Ethics & Compliance*** if we think we might have a conflict of interest or are involved in an activity that could appear to be a conflict of interest.

Manage conflicts ***properly*** and transparently to engender trust.

VALUES IN ACTION

It is not necessarily bad to have a conflict of interest. Conflicts can arise from the normal course of having relationships with family, friends and community. Conflicts can also interfere, or give the perception of interfering, with good judgment. We must promptly disclose conflicts as a way of demonstrating Integrity Beyond Reproach and prioritizing TNC's interests, and so that any potential conflict of interest can be assessed and mitigated, where possible.

Here are some examples of situations where conflicts often arise:

- Involvement in the hiring of a family member or close friend.
- Being in the reporting line of a family member or significant other.
- Accepting gifts or hospitality (meals/entertainment) that could influence how you make decisions.
- Service on the board of an organization that has or could have transactions with TNC or could take actions that impact TNC.
- Engaging in outside employment or consulting work.
- Running for public office.
- Sale or purchase of real property or water rights from or to a board member, trustee or fellow staff member.

© **ANURAG KUMAR / TNC** Shades of shadow. *Photo Contest 2019*

PEOPLE AND NATURE THRIVE WHEN WE...

REDUCE *the Risk of Bribery or Corruption*

Bribery and corruption are both illegal and unethical and can perpetuate or even create social inequity. We do not offer or accept bribes in exchange for favorable treatment, no matter where or with whom we work, even when local law or custom may permit such conduct. We comply with all laws around the world that govern and prohibit bribery and corruption.

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AT TNC, WE...

Never offer or ***accept something of value*** in order to unfairly influence a decision or treatment in TNC's favor.

Provide oversight of the work of representatives who act on behalf of TNC to confirm that their actions are in accordance with our Values and standards.

Know that anti-bribery and corruption laws apply to ***grants*** and ***donations***, including charitable contributions.

Take extra care when we or our representatives are working with ***government officials***, because of the heightened risk of bribery or corruption in that context.

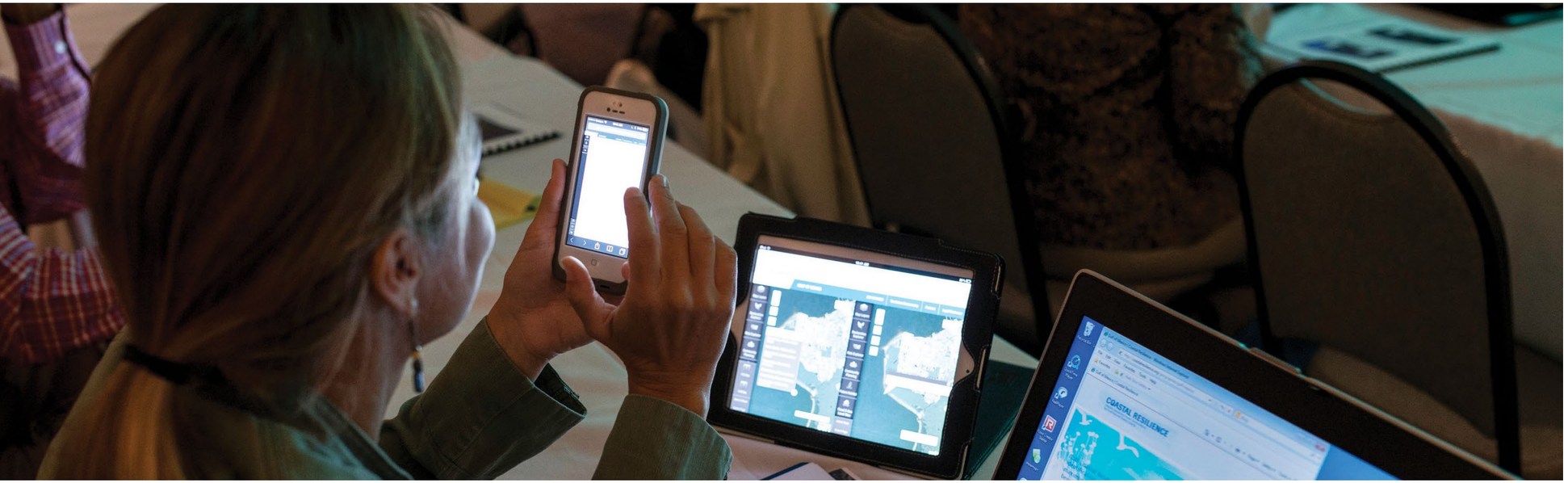
VALUES IN ACTION

Bribery is offering or accepting anything of value to influence the judgment or conduct of another person or to obtain a business advantage. Corruption is the abuse of power for personal gain.

TNC can be held responsible for the actions of our representatives, including consultants, contractors and agents who work on our behalf. If you engage with representatives on behalf of TNC, be certain that you know with whom you are working and that their actions are consistent with our expectations.

Some warning signs to watch out for include when a government official or partner:

- Recommends a specific person or company to supply products, help obtain a permit or provide some other service.
- Requests payment, such as a grant, be made directly to a particular person or requests payment in cash.
- Requests fees that are much greater than the market rate for comparable work without any reasonable explanation.
- Cannot or will not provide credible references.
- Requests a paid or unpaid position with TNC be granted to a family member or friend.
- Asks for an extra or unofficial payment to "expedite" or "facilitate" a routine government service.
- Submits an expense for reimbursement without documentation and/or without an explanation of business purpose.



© **CARLTON WARD JR.** *October 2013. The Nature Conservancy's Coastal Resilience workshop in Punta Gorda, Florida, USA.*

PEOPLE AND NATURE THRIVE WHEN WE...

PROTECT *Confidential Information and Respect Privacy*

TNC staff are the creators and stewards of many types of confidential information, including personal data about our employees and donors and sensitive data about our partners. We must keep all confidential information about our work safe at all times. When it comes to handling personal data, we limit the amount of personal data we collect, and we respect the privacy of that person. We comply with laws that apply to the collection, storage and use of personal data everywhere we do business.

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AT TNC, WE...

- Use TNC confidential information with utmost care, only for ***legitimate business purposes*** and in compliance with TNC's policies and SOPs.
- Refrain from commenting on or sharing TNC's ***confidential work*** or ***protected information***.
- ***Conduct due diligence*** on external parties who will have access to TNC's confidential information as part of our work with them.
- ***Immediately report*** any suspected incidents of inappropriate access to or use of TNC confidential information to Helpdesk@tnc.org.

VALUES IN ACTION

Integrity Beyond Reproach means always thinking about keeping TNC's confidential information safe, including any personal data TNC is responsible for. For example, when discussing confidential information, make sure that you are in a private place where others are not likely to overhear you. Keep your laptop and all mobile devices stored in a safe place and locked when not in use. Handle personal data with privacy in mind and an understanding that respecting individuals includes respecting their personal data.

We provide a privacy notice whenever we collect an external party's personal data, detailing how we use it, share it and protect it.

To ensure TNC abides by the terms of our privacy notice:

- Use confidential or personal data for business purposes only and not for personal reasons.
- Only collect personal data that we need to meet a specific purpose.
- Share personal data only with those who have a need to know and who will protect it using security standards at least as secure as those used by TNC.
- Protect personal data by properly classifying it and destroying it when it is no longer needed.

© **CARLTON WARD JR.** *Carrie Black (Palm Beach County) and Cody-Marie Miller (TNC Staff) drive a cart with equipment from a prescribed burn conducted by an all-female prescribed fire crew at The Nature Conservancy's Disney Wilderness Preserve in Florida, USA.*

PEOPLE AND NATURE THRIVE WHEN WE...

STAY SAFE *and Keep Others Safe*

Given the unique nature of our work at TNC, we participate in a large span of activities around the world, some of which can include risks. We keep ourselves and others safe by implementing the appropriate precautions when doing field work, whether on land or in or on water. We are also committed to a workplace free from violence, as well as from drug and alcohol abuse.

FOR INTERNAL USE

POLICY & PROCEDURES | RESOURCES | JOB AIDS

AT TNC, WE...

Work safely at all times.

Never allow our judgment or capabilities to be impaired by ***drugs*** or ***alcohol*** while at work.

Speak up if we ever feel unsafe or have concerns that someone else might be unsafe.

Understand and follow ***all safety procedures***, including those for travel, vehicle use, fire management, boating, diving, firearms use and youth activities.

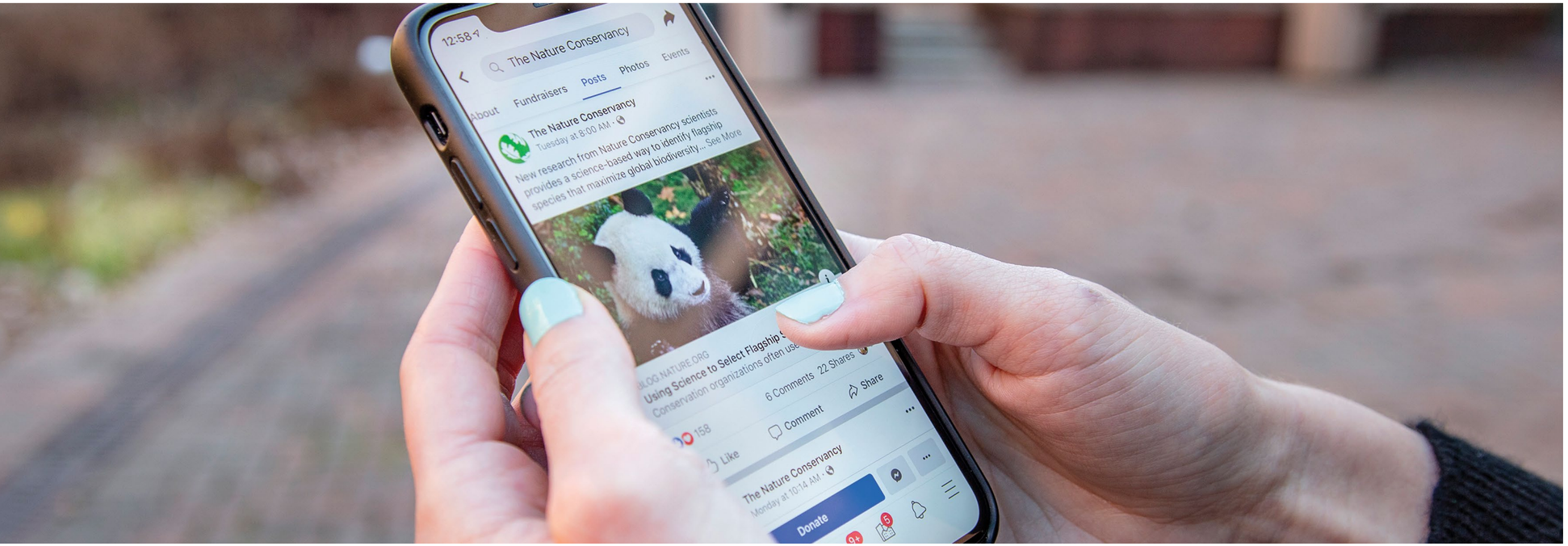
VALUES IN ACTION

We take safety and security seriously and comply with all safety laws and requirements that apply to everything we do—from working in an office to driving a TNC vehicle. Whether we are diving, boating, conducting prescribed burns or doing other field work, we take extra precautions when working in remote locations where it is more difficult to get immediate assistance if an injury occurs.

It is important to plan and be prepared for potential security, safety and medical risks. By thinking ahead, we can help keep ourselves and each other safe.

Here are some things we can do to practice good safety and security management:

- Install sprinklers and security features in the office.
- Drive slowly and defensively, always wearing a seat belt.
- Wear appropriate clothing for the weather and activities.
- Travel with or consult a local guide.
- Check boating and diving requirements before you engage, and always wear a life vest.
- Contact emergency response personnel as soon as possible in life-threatening situations.



© **ALEX SNYDER/TNC** *Hands holding phone showing TNC's Facebook social media feed. Arlington, VA, USA.*

PEOPLE AND NATURE THRIVE WHEN WE...

TAKE CARE *with Social Media and Public Statements Related to TNC*

At TNC, how we communicate about the organization has a significant impact on our reputation around the world. It is important that we speak clearly and accurately about TNC and respect our obligation as employees to safeguard confidential information.

AT TNC, WE...

- Act ***professionally, courteously*** and ***respectfully*** in communications related to work.
- Make official statements to the media or the public on behalf of TNC ***only with proper permission*** to do so.
- ***Avoid sharing confidential information*** about TNC and show the same care with the confidential information of others.
- ***Make it clear*** that our beliefs, especially political beliefs, are our own and not those of TNC, unless our communication is made on behalf of and approved by TNC.

FOR INTERNAL USE

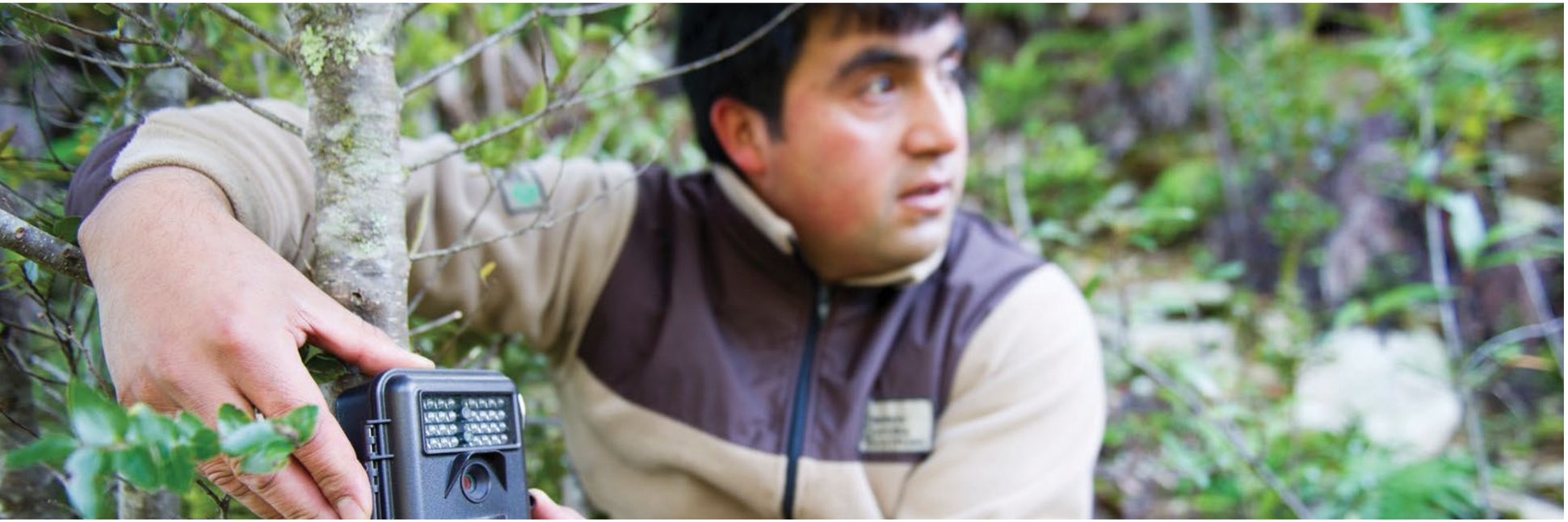
POLICY & PROCEDURES | RESOURCES | JOB AIDS

VALUES IN ACTION

When we use social media sites to communicate and share our ideas, many people around the world may have access to it. When operating on behalf of TNC, by choosing our words thoughtfully, we present ourselves and TNC with integrity.

Using social media responsibly means:

- Requesting approval from the Digital Review Committee for new social media accounts created on behalf of TNC.
- Identifying ourselves appropriately, in a personal capacity, unless we are speaking on behalf of TNC, and only with permission.
- Practicing civility and honoring our shared Values when using social media on behalf of TNC.
- Sharing content from external sources only with proper permission.



© **NICK HALL** *Erwin Ovando, one of the Valdivian Coastal Reserve park guards, on a routine invasive species assessment, Valdivian Coastal Reserve, Los Rios, Chile. Gorse (Ulex europaeus) is particularly widespread in the park due to its remarkable resilience and aggressive life history.*

PEOPLE AND NATURE THRIVE WHEN WE...

SAFEGUARD *Intellectual Property*

Our intellectual property helps brand us and constitutes an important TNC asset. While we may share our intellectual property in service of our mission, we keep it safe so that we protect it and maintain the required level of control over all uses of it.

AT TNC, WE...

Know how to ***identify intellectual property*** and protect it.

Make sure that we have the right to use the intellectual property of others ***before*** doing so.

Ask questions or ***seek guidance*** if we have concerns about whether something constitutes intellectual property such that we need to take steps to protect it.

FOR INTERNAL USE

POLICY & PROCEDURES | RESOURCES | JOB AIDS

VALUES IN ACTION

TNC's name and logo are trademarks and are valuable, protected property. We can only allow others to use our name and logo when they are aligned with our mission and the use is approved. When we partner with others in marketing relationships, those partnerships must be reviewed and approved to protect our brand. We also respect the intellectual property of others, and we use the images, video, music and brands of others only with their permission.

Intellectual property includes a wide variety of rights, mostly arising from creative ideas, intellectual effort or unique applications of technology.

Some examples include:

- Trademarks, such as TNC's name and logo
- Copyrights, such as material describing scientific data, including articles and books
- Software
- Trade secrets
- Patents

© **JUSTINE E. HAUSHEER/TNC** *The TNC team examines the map of a logging concession in Indonesian borneo. Scientists are trying to sample audio in each of the logging concession's annual cutting blocks. By placing acoustic recorders, the team is hoping to help understand how different types of land uses impact biodiversity here in Borneo..*

PEOPLE AND NATURE THRIVE WHEN WE...

PROTECT *TNC's Assets and Use Information Systems Responsibly*

Safeguarding TNC's assets and protecting them from theft, waste, misuse or abuse is a critical responsibility for all of us. As stewards of TNC, we protect our physical assets as well as our technology and information systems.

AT TNC, WE...

- ***Take care of all physical property*** that belongs to TNC—from office space and vehicles owned by the organization to equipment and livestock used in our research and business operations.
- Demonstrate ***good judgment*** whenever using TNC's information and technology systems.
- Limit use of both physical property and information and technology systems to ***business purposes***.
- Use artificial intelligence ("AI") tools in accordance with TNC guidance. This includes using only ***TNC-approved AI tools*** and ensuring human review and verification of the output of AI tools.

FOR INTERNAL USE

POLICY & PROCEDURES | RESOURCES | JOB AIDS

VALUES IN ACTION

How we use our assets says a lot about who we are as an organization. At TNC, we use our assets appropriately. When we treat what belongs to TNC with integrity and care, we foster an ethical culture.

Here are some actions we all can take to protect TNC assets:

- Maintain and operate TNC vehicles and equipment responsibly.
- Store TNC equipment and tools appropriately.
- Recognize and report suspicious emails or activities on our network that may be intended to steal from us or cause us harm.
- Avoid visiting websites or downloading software not approved by TNC.
- Use strong passwords.
- Follow instructions from IT to protect our systems and data.

Our Commitment

Your Ethics & Compliance Team at TNC

nature.org/CodeofConduct | nature.org/TNCHelpline

At TNC, people and nature thrive when we follow this Code of Conduct and commit to Integrity Beyond Reproach. We hope you will continue to use this Code as a resource and seek guidance if you have questions or need more information.

SPEAKING UP

Remember that speaking up is essential to a culture of integrity, trust and accountability and that TNC has multiple resources available to you if you want to ask a question or need to report a concern about potential misconduct. ***If you are an employee, you can contact:***

- your manager
- another TNC supervisor
- a member of the People Team
- a member of the Ethics & Compliance team

In addition, employees and external parties may contact the Ethics & Compliance team to submit a question or concern through TNC's Helpline at ***www.nature.org/tnchelpline*** or by email at ***compliance@tnc.org***.

THANK YOU for your commitment to Integrity Beyond Reproach, your contributions to TNC's mission and your part in striving for a world where people and nature thrive.