

# Code of Conduct

*People and Nature Thrive When We...*



**DOWNLOAD OUR CODE OF CONDUCT  
IN ADDITIONAL LANGUAGES:**

**FRENCH**

**INDONESIAN**

**PORTUGUESE**

**SIMPLIFIED CHINESE**

**SPANISH**

**SWAHILI**



# Table of Contents

A Message from our CEO on The Nature Conservancy's Code of Conduct	1
A Note from Our Ethics & Compliance Team	2

---

## PEOPLE AND NATURE THRIVE WHEN WE...

Commit to Our Values	3
Understand Our Expectations and Responsibilities	3

---

## RESPECT EACH OTHER

Behave Professionally and Respectfully	4
Commit to Diversity, Act Fairly and Leverage Our Differences	5
Engage in Quality Conversations	6

---

## RESPECT THE WORLD AROUND US

Respect All Communities	7
Respect and Support the Furtherance of Human Rights	8
Act Sustainably in Our Work	9

---

## ACT WITH INTEGRITY

Follow Applicable Laws and Regulations and Avoid Fraud, Theft and Corruption	10
Provide and Accept Gifts, Meals and Entertainment with Integrity	11
Act as Good Stewards of All Funding and Donor Money	12
Stay Safe and Keep Others Safe	13
Avoid Conflicts of Interest	14

---

## SAFEGUARD OUR REPUTATION

Take Care with Social Media and Public Statements Related to TNC	15
Preserve Our Charitable Status	16
Keep Confidential Information Safe and Respect Privacy	17
Safeguard Intellectual Property	18
Protect TNC's Assets and Use Information Systems Responsibly	19

---

## OUR COMMITMENT

What happens when I make a report?	20
What happens if someone retaliates against an employee because they made a report?	20







© ALEX SNYDER/TNC Portrait of Jennifer Morris, CEO of The Nature Conservancy.

## A MESSAGE FROM

# Our CEO on The Nature Conservancy's Code of Conduct

Each day we continue to witness our planet struggle against the forces of climate change and biodiversity loss—putting our ecosystems, communities, and livelihoods in harm's way. We also see how acts of social injustice, inequity, and violence add to this struggle.

As we navigate these difficult times, it is critical to conduct ourselves in a way that upholds our values and ensures that we treat people with dignity and respect.

Since 1951, TNC 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, diverse network of staff, volunteers, and supporters from around the world. This dedicated network plays a critical role in helping TNC achieve our important mission to protect the lands and waters on which all life depends.

Collaboration is our strongest lever to create lasting progress for our planet—but to work effectively with each other, we must first establish trust. It is TNC's responsibility to ensure that we create a safe and inclusive work environment, where all of our team members can thrive and work effectively with our partners.

Our Code of Conduct is a tool to build trust. The Code guides actions and decisions to ensure that we all treat each other with respect, fairness, and integrity beyond reproach. Importantly, this code is an extension of TNC's core values and provides clear examples of how we can live those 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 create 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,

A handwritten signature in black ink that reads "Jennifer L. Morris". The signature is fluid and cursive.

**Jennifer Morris**  
Chief Executive Officer

## A NOTE FROM

# Our Ethics & Compliance Team

Achieving our mission to conserve the lands and waters on which all life depends requires us to act with integrity in all we do - every day and everywhere we operate. We commit to meeting the highest ethical and professional standards in all our actions. By doing so, we are accountable to our mission, each other, our donors and all of our partners, and we foster our ethical culture.

We know that sometimes the way to act with integrity is not always clear. This Code is a guide to assist you in making ethical decisions and to hold ourselves and each other accountable. Look for quick navigation links to the sections of our Code at the top of the Code page and for icons at the bottom left that link to additional resources on a topic, such as a policy, SOP, quick guide, or CONNECT page.

Our Ethics & Compliance team is a resource to help you navigate challenging situations and ethical dilemmas that might arise in our work. We are all responsible for speaking up if something does not feel right or if we have concerns about ethical misconduct. We know it takes courage to speak up. TNC will not tolerate retaliation against individuals who ask questions or raise concerns about potential misconduct. You can Ask a Question or Report a Concern through our helpline, [www.nature.org/tnc helpline](http://www.nature.org/tnc helpline), or **contact us directly**. Look for a link to the TNC Helpline on the top left of the pages of the Code.

While it takes each of us to create and maintain an ethical culture, we know ethical leaders are necessary to foster an ethical culture. We hold our leaders accountable to:

- Make decisions and act in accordance with our values and Code of Conduct.
- Have an open-door policy and foster a connection to the staff they serve.
- Seek guidance from Ethics & Compliance when needed.
- Praise staff who model ethical behavior and hold staff who do not accountable.
- Watch for and help prevent retaliation. Ensure staff complete required trainings and encourage learning.

*Thank you for your commitment to our Code of Conduct.*





# People and Nature Thrive When We...

## COMMIT to Our Values



INTEGRITY BEYOND REPROACH



ONE CONSERVANCY



RESPECT FOR PEOPLE,  
COMMUNITIES AND CULTURES



TANGIBLE, LASTING RESULTS



COMMITMENT TO DIVERSITY

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 is designed to provide guidance as we conduct our daily work on behalf of The Nature Conservancy (TNC) in accordance with Our Values. It does not give specific information on all our Policies and Standard Operating Procedures (SOPs) nor the laws and rules 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. Our Values and the rules with which we all need to comply are also reflected in TNC's Policies and SOPs.

## UNDERSTAND Our Expectations and Responsibilities

The Code applies worldwide to all TNC staff. It also applies to board members, trustees, donors, and volunteers at 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, and TNC Policies and SOPs. We expect third parties and partners with whom we do business to conduct themselves in ways that are consistent with our Code. Our policies and values are more protective than the laws and customs in certain countries. In those cases, those of us who work for or with TNC will be held to the higher standards set forth 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' hi' a Gon III, Senior Scientist and Cultural Advisor at the Nature Conservancy, Hawaii Program, Maunawili Falls Trail, O'ahu, Hawaii, USA.





ASK A QUESTION OR REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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, social outings, field work, 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.**



Watch for inappropriate behavior and **speak up** if we see it.



**Think** about how our actions impact others and **learn to recognize and disrupt biases** related to stereotypes around our differences.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### VALUES IN ACTION

No matter where we are located, what we believe or how we contribute to TNC, we all deserve to be treated with kindness and consideration. Disrespect, bullying, and intimidation have no place here.

### A CLOSER LOOK

TNC is committed to a workplace where everyone is treated with dignity, courtesy, and respect. We disagree productively by separating ideas from identity. We give credit where it is due. We allow each other to learn and grow from mistakes. Unprofessional and disrespectful behavior can disrupt our workplace, interfere with achieving our mission and impact personal health.

Generally, sexual harassment includes unwelcome conduct. It can be physical, written, or oral, overt or subtle. It can be any action of a sexual nature that a person finds intimidating, hostile, or offensive.

#### Some examples of unacceptable behavior include:

- 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 messages.
- Excessive alcohol consumption.
- Spreading gossip or rumors.
- Unwelcome physical contact or physical intimidation, including those of a sexual nature.
- Jokes or conversations that include sexual innuendo.
- Repeated requests to spend time out of the office together.
- Giving favors or opportunities in exchange for sexual relations.





ASK A QUESTION OR REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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 Diversity, Act Fairly and Leverage Our Differences

Our success and innovation depend largely on our ability to leverage our differences, lean into our strengths, and learn from one another. We treat everyone with respect, and we value the varying perspectives and experiences others bring to our work and interactions.

### AT TNC, WE...



Are **inclusive of all people** and look for a wide range of talent when recruiting and hiring.



Make employment decisions based on an individual's **credentials** and **skills**, including a **diversity of perspectives** and **experiences**.



Seek to **learn new perspectives** from people with varying experiences, backgrounds and cultural influences..



Continually **engage with one another** and our partners in thoughtful, intentional, meaningful ways.

FOR INTERNAL USE



### VALUES IN ACTION

We approach differences as opportunities and assure Inclusion in our engagements and communications. From our colleagues to the communities we serve to the donors and partners who support us, we recognize the importance of listening respectfully to one another and communicating authentically and strive to find solutions together.

### A CLOSER LOOK

Our values and policies are designed to protect individuals from being treated unfairly based on unique personal characteristics such as: race, color, nationality or regional origin, ethnicity, tribe, religion, age, ability, sex or gender identity, sexual orientation or military or veteran status.

#### We deepen our commitment to Diversity at TNC by:

- Engaging with one of our Employee Resource Groups that provide a community for staff, opportunity to network, and a way to elevate feedback and share stories.
- Communicating authentically and effectively with one another in a respectful manner.
- Creating a workplace where people feel a sense of belonging and are 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.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© KEVIN ARNOLD July 2015. The Yangtze River flows across China and empties into the East China Sea near the historic city of Shanghai. The Conservancy is working with Chinese partners to invest in watershed conservation as well as engaging the hydropower industry to better plan, design, and operate dams.

PEOPLE AND NATURE THRIVE WHEN WE...

## ENGAGE in Quality Conversations

A quality conversation is a meaningful and mutually rewarding dialog 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 to ensure we're making the best, most informed decisions. We avoid approaching a conversation to be right, win, convince or defeat the other's view. We commit to listening to each other in crafting the best path forward.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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, as well as express our experiences and opinions.



Focus on **facts, common goals**, and our shared TNC values to improve connection and accelerate learning.



Recognize and respect our **different communication styles** and ways of understanding based on our experiences, identities, organizational roles, culture and professional backgrounds.

### VALUES IN ACTION

Connecting to and respecting what is already important for people, rather than trying to convince them to change, is one way we can foster the person-to-person connections that create value across TNC.

### A CLOSER LOOK

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 like to talk about their thoughts as they occur to them, and some like to formulate their thoughts before communicating. Some would rather be straightforward and direct, and some would rather use indirect communications and quiet listening. When working together, we will be more productive if we recognize our different communication styles, help each other find the facts we hold in common and speak respectfully.

#### **We practice quality conversations when we:**

- Ask questions to build understanding and replace our assumptions with facts.
- Challenge with care and remain open to others challenging us with care.
- Question ideas with respect for people.
- Step up if we have something of value to add while also allowing others the space to speak.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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 our local communities, as well as those throughout the world is central to our mission. We recognize the importance of the leadership and partnership of local communities and Indigenous Peoples who have long protected their lands and waters in reciprocity with nature and are often guided by strong connections to place and culture. We demonstrate respect for all local populations and cultures, wherever we operate.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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 responsive approaches to **gender equity** and **equity for vulnerable populations** in our work.

### VALUES IN ACTION

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. FPIC is an ongoing process, achieved through continuous dialogue, information sharing, and the building of trust and relationships over time.

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 leads to 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.

### A CLOSER LOOK

Indigenous Peoples and local communities are considered as those who possess a close relationship with their natural landscapes, which they depend on for cultural, spiritual, economic and physical well-being. This includes the original inhabitants of a place as well as migrants who have settled in a place and have a strong connection with the natural landscape. TNC recognizes the collective rights of Indigenous Peoples as codified in international law.

TNC works in all 50 of the United States and across the world. Our actions impact people in communities large and small through conservation goals that prioritize projects in key areas around the world. By supporting Indigenous and community-led conservation, we can identify common areas that, when addressed collaboratively, lead to successful outcomes for conservation and human rights.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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 protection and conservation of nature is closely related to the rights of people 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 understand that our goals and mission must never become more important than the rights of the people living in the communities we serve.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### AT TNC, WE...



Design our conservation work with a **human-centered approach** to safeguard human rights.



**Respect the rights** of one another and the people in all the communities where we work.



**Prohibit child labor, indentured servitude** and **slavery** in our operations.



**Build awareness** for mitigating, preventing and responding to gender-based violence.



Treat our staff fairly, protect them from **exploitation** and **abuse** in our operations and comply with applicable labor and employment laws.



Make sure our workplaces are **safe**.

### 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.

### A CLOSER LOOK

Human rights are generally defined as the universal rights and freedoms that are to be enjoyed by all people. Human rights violations include mistreatment or abuse to exploitation or slavery of individuals or groups. They can include use of child labor, poor working conditions, involuntary servitude, human trafficking, or abuse and sexual exploitation. They can also include situations where specific Indigenous Peoples or other groups are threatened by land encroachment, deprivation of land tenure rights or seizure, or when Indigenous Peoples are deprived of their right to free prior and informed consent.

We are a member of the Conservation Initiative on Human Rights, a consortium of international conservation organizations that seek to improve conservation practices by promoting human rights in our policies and practices. We follow our procedures to assess risk of human rights violations in our work, implement appropriate steps to mitigate the risk and monitor for violations. Our risk assessment includes conducting due diligence on our partners who will undertake work on our behalf, especially those who will interact with local communities, Indigenous Peoples and vulnerable populations.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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's also what we expect from ourselves and what our members, donors, and external partners expect from us as well. Leading by example is how we inspire others to act sustainably.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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 waste, travel, meetings, energy, water usage and purchasing.



**Monitor progress** and **adjust our priorities** as needed to meet our sustainability goals.

### 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 same commitment to sustainability and the environment.

### A CLOSER LOOK

We act sustainably and minimize our carbon footprint when we:

- Utilize audio or video conferencing 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 EV or hybrid vehicles.
- Select lodging with eco-friendly practices and policies
- Choose a venue where reusable plates and flatware can be used.
- Use renewable sources of energy and work in energy efficient (LEED certified) buildings when possible.
- Utilize our global travel management partner to schedule and manage safe and sustainable travel.
- Travel smart by bundling our remote commitments.
- Transition vehicle fleets from fossil fuels to zero emission and hybrid vehicles.
- Choose no or low emission modes of commuting.
- Prioritize sustainable waste and composting practices at office facilities.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© **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...

## **FOLLOW** *Applicable Laws and Regulations and Avoid Fraud, Theft and Corruption*

Bribery and corruption are illegal, unethical, and can perpetuate or even create social inequity. We follow applicable laws and regulations to ensure Integrity Beyond Reproach. We do not offer or accept bribes in exchange for favorable treatment, no matter where or with whom we work. We pay close attention when we are working with government officials. We comply with all laws around the world that govern bribery and corruption.

### 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 ensure that their actions are in accordance with our values and standards.



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



Understand that special rules apply whenever we, or our representatives, are working with **government officials**.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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. At TNC we demonstrate honesty, trustworthiness and morality by prohibiting all forms of bribery and corruption in our operations. This expectation extends to our staff, our partners and all those with whom we do business and applies even when local law or custom may permit such conduct.

### A CLOSER LOOK

TNC can be held accountable for the actions of our representatives, including consultants, agents, and contractors who work on our behalf. If you engage with representatives on behalf of TNC, be certain that you know whom you're working with and that their actions are consistent with our policies, this Code, and the law. Some red flags 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 person.
- Requests fees that are much greater than the market rate for comparable work without any reasonable explanation.
- Requests payment in cash.
- Cannot or will not provide credible references.
- Requests a paid or unpaid position with TNC be granted to a friend or family member.
- Asks for an extra or unofficial payment to "expedite" or "facilitate" a routine government service.





ASK A QUESTION OR REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© CARLTON WARD JR. The Nature Conservancy staff Jacqueline Ferrato and Rich Kostecke use a mist net to catch and band birds at TNC's 17,351-acre Powderhorn Ranch in Texas, USA. This land was purchased in 2014 using Gulf Coast restoration funds. The ranch is one of the largest remaining tracts of unspoiled coastal prairie in the state of Texas.

PEOPLE AND NATURE THRIVE WHEN WE...

## PROVIDE and Accept Gifts, Meals and Entertainment with Integrity

Providing gifts, entertainment or hospitality in the course of conducting business can be customary and lawful in certain parts of the world. If we give or receive gifts or pay for travel or other hospitality, particularly to government officials, we make sure that doing so is appropriate and is not intended to unfairly influence business decisions or buy favors, real or perceived. This also applies to TNC staff accepting any offer of gift, entertainment, or hospitality.

### AT TNC, WE...



Provide and accept gifts or entertainment only when there is a **legitimate business reason**.



Provide and accept gifts that are **legal** under local law and customary.



Provide and accept gifts that are **reasonable, appropriate, infrequent and unsolicited**.



Check for pending business transactions **before providing or accepting gifts or entertainment**; and if one exists, don't provide or accept a gift or entertainment that could affect or be viewed as affecting the outcome.



Keep **accurate records** of the gift or entertainment.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### VALUES IN ACTION

When we provide or accept business entertainment, we follow guidance from our policies and procedures and exercise good judgment, informed by our shared values. We provide and accept meals, travel, entertainment and discounts only when we are sure that it is reasonable, there is a legitimate business purpose, that it will not influence current or potential business transactions and that no conflict exists.

### A CLOSER LOOK

While working or engaging with a partner, you may feel inclined to offer a gift. However, there is strict guidance that should be applied to these scenarios, regardless of whether the partner is a government official. It is important to seek guidance to ensure any gifts or hospitality are allowable.

If you receive gifts, entertainment, meals, travel or discounts that are lavish or that could appear to influence a business decision, politely decline.

Keep track and limit the frequency of gifts, meals or entertainment to an individual or single organization.

Ensure that any gift, travel or entertainment offered by TNC has a legitimate business purpose, is modest and appropriate for the occasion and doesn't have the appearance of influencing a business decision.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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 Good Stewards of All Funding and Donor Money

We use public and private funds, in whatever form, only to further TNC's mission and in ways that align with our values. When our donors contribute to TNC, they trust us to use their contributions effectively and resourcefully in a way that advances our shared goals for the organization. We demonstrate accountability to ourselves and others by implementing policies, procedures and controls to ensure we spend funds with careful attention to effectiveness and efficiency and that we maintain accurate and complete records.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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.



Record diligently how we use funds and comply with all **accounting** and **legal requirements** that apply to the receipt and use of funds.



Make commitments to donors **only if we know that we can keep them** and use donor funds in accordance with donor intent.



Act **cautiously** and **vigilantly** if our work involves operations that are at high risk for money laundering and terrorist financing.

### VALUES IN ACTION

We make careful use of our resources, maximizing the funding that goes toward our science-driven program work. We ensure that our spending advances our conservation goals, aligns with our values and complies with applicable rules and regulations. We maintain accurate books and records to demonstrate our accountability and commitment to transparency in preventing corruption, bribery, money-laundering and sanctions.

### A CLOSER LOOK

It is our responsibility as a charitable organization to ensure we honor the intended use of donor funds and funds provided to us through grants. This is both an ethical choice and a commitment to respecting the trust of our donors and funders. Donor intent is sometimes expressed explicitly by the donor; other times it is simply a notation on a personal check, or a note included with the donation. No matter how the donor chooses to communicate, we record these contributions to reflect the donor's intent when the donation is received and all transfers or use of the funds then follow donor intent.

Our Finance and Development groups provide guidance on how to accurately record receipt and expenditures of funds, including how to properly apply codes to both. By properly coding receipts of funds and expenditures, we ensure transparency and the ability to follow the trail of funds to show accountability.





ASK A QUESTION OR REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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.

PEOPLE AND NATURE THRIVE WHEN WE...

## STAY SAFE and Keep Others Safe

Given the unique nature of our work at TNC, we are responsible for keeping ourselves and others safe across a large span of activities around the world. This includes ensuring we have implemented the appropriate precautions when undertaking field work, on land and in or on water. We also have a commitment to ensure that our workplace remains free from violence, as well as from drug and alcohol abuse.

### AT TNC, WE...



**Work safely** to ensure our safety and health and ensure our actions do not cause harm to others.



**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, fire management, boating, diving, firearms and youth.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### 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 field work, we take extra precautions when working in remote locations where it is more difficult to get immediate assistance if injury occurs.

### A CLOSER LOOK

It is important to plan and be prepared for potential security, safety, and medical risks when conducting our work. Thinking ahead about possible risks and considering what actions we can take to reduce or plan for those risks can ensure we have a safe and successful work experience.

Reducing vulnerability is part of good safety and security management. While we may not be able to reduce the threat around us, we can reduce our vulnerability by taking proper precautions, such as:

- Drive slowly and defensively; always wear 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.
- Install sprinklers and security features in the office.
- Contact emergency response personnel as soon as possible in life threatening situations.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© **ARIANA LINDQUIST** Matthew Kovach (left), the Nature Conservancy's Lake Erie Coasts and Islands Program Manager, and Alexis Sakas, TNC's Coastal Conservation Project Coordinator, set fish traps in Lake Erie off the coast of Cedar Point National Wildlife Refuge, near Toledo, Ohio, USA. They are setting traps to assess fish population diversity and health in wetland restoration projects like Cedar Point NWR.

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 act in the best interests of TNC. At TNC, we avoid conflicts of interest and the appearance of conflicts of interest.

### AT TNC, WE...



Understand what it means to have a **conflict of interest**.



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** to be fair in all our dealings.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### VALUES IN ACTION

Conflicts arise from the normal course of having relationships with friends, family and community. But conflicts can also interfere, or give the perception of interfering, with good judgment. Our stakeholders, including our donors, invest in us because they are counting on us to put TNC's mission first. Avoiding conflicts of interest enables us to maintain our reputation as a cause worthy of contribution.

### A CLOSER LOOK

**Here are some examples of situations where conflicts are likely to arise:**

- Involvement in the hiring of a family member or close friend.
- Service on a board of an organization that has or could have transactions with TNC, is related to TNC or could take actions that impact TNC.
- Engaging in outside employment or consulting work that interferes with your ability to do your work for TNC.
- Maintaining a reporting relationship which impacts your ability to be objective (such as with a family member).
- Running for public office.
- Accepting gifts or entertainment that could impact how you make decisions.
- Sale or purchase of real property or water rights from or to an individual or entity that has a fiduciary obligation to protect TNC's interests first, for example, a member of our Global Board, Trustees, or staff.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

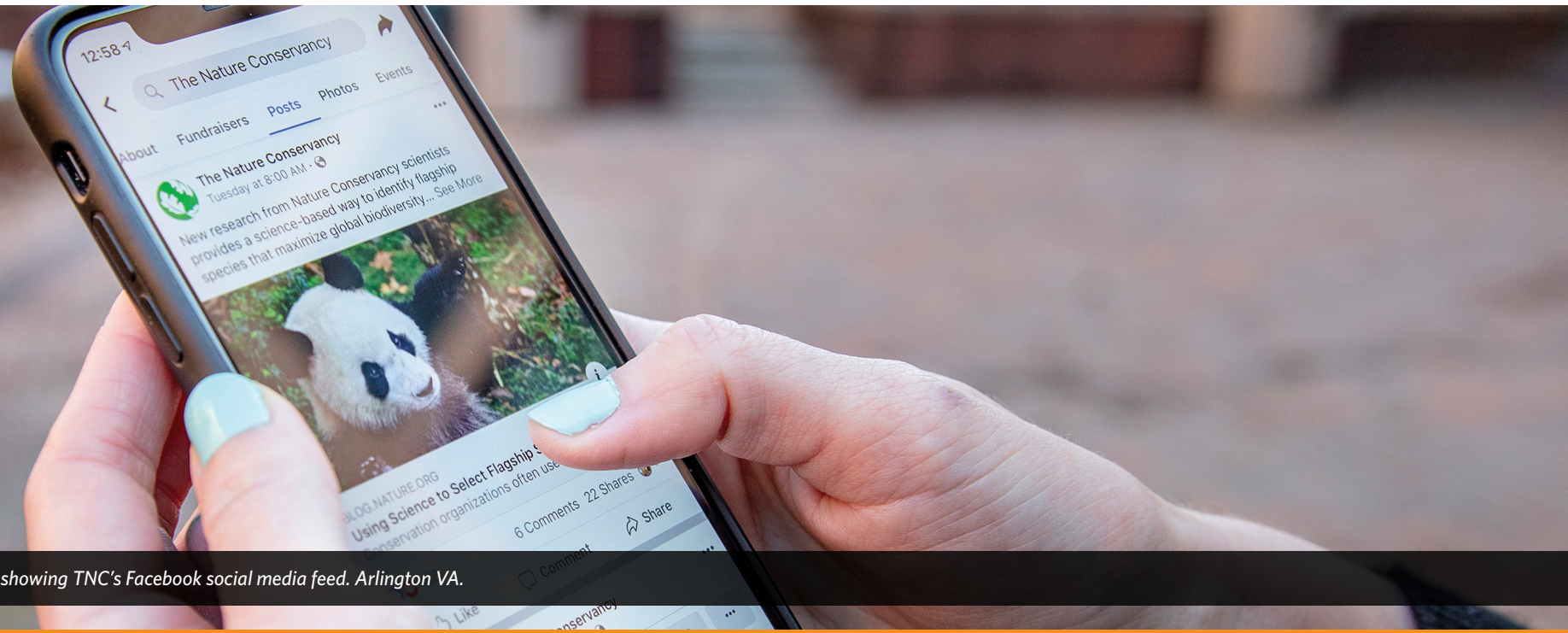
RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



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

# Safeguard Our Reputation

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, accurately, and transparently about TNC and respect our obligations 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 beliefs and **not the beliefs 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. By choosing our words thoughtfully, we present ourselves and TNC with respect.

### A CLOSER LOOK

Social media refers to websites and applications where individuals can share and participate in social networking. For example, social media includes sites such as Instagram, Facebook, Snapchat, Twitter, Weibo, WeChat, WhatsApp, YouTube, and more. Social media can be an effective platform when we use it responsibly in our work for TNC to promote and share our ideas and to communicate with contacts and friends around the world.

#### 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.
- Refraining from commenting on or sharing TNC's confidential work or protected information.
- Practicing civility and honoring our shared values when using social media on behalf of TNC.
- Ensuring we have proper permissions when sharing content from sources from other organizations.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© IAN SHIVE Loco fishery at Huape Fishing association in Palo Muerto Locality, Chile. Loco are a type of Chilean Abalone and are important to the local economy for their high value. This gathering of abalone takes place once a year.

PEOPLE AND NATURE THRIVE WHEN WE...

## PRESERVE Our Charitable Status

As a public charity, TNC receives certain benefits, as well as important responsibilities. To maintain TNC's status, our work must advance our mission. We take our responsibilities seriously and comply with these standards wherever we work across the globe. This includes responsibilities that relate to our accounting practices, use of our name and logo, as well as our lobbying and political activities.

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### AT TNC, WE...



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



Comply with the **lobbying laws and regulations** that apply to the work we do for TNC and avoid excessive lobbying, including, keeping track of time and related lobbying resources in compliance with our Policies and Procedures.



Understand and follow **fundraising laws and standards** and oversee professional fundraisers we engage in our work.



**Pay fair market values** for services and products and avoid providing private benefit to any individual or organization.



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

### VALUES IN ACTION

Our reputation as a highly respected charitable organization enables us to continue to do the work we do. We each have a responsibility to protect our reputation at every turn. From avoiding conflicts of interest, to demonstrating transparency in all we do, to complying with all laws that apply to us—our donors and the public at large count on us to always do the right thing.

### A CLOSER LOOK

Electioneering refers to the activities politicians and their supporters use to influence voting. While we cannot advocate for or against a political party or 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 we each take to prevent electioneering:

- Refrain from using any TNC resources (such as email, office space, or time) to advocate for any candidate.
- Ensure we do not wear TNC-branded clothing if participating in a political campaign or event.
- If posting political content on social media, individuals can include a disclaimer on their personal page that they are doing so in a personal capacity and not as a representative of TNC.

Senior leaders must take extra caution to avoid even the appearance of electioneering and seek guidance before engaging in political activities.





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

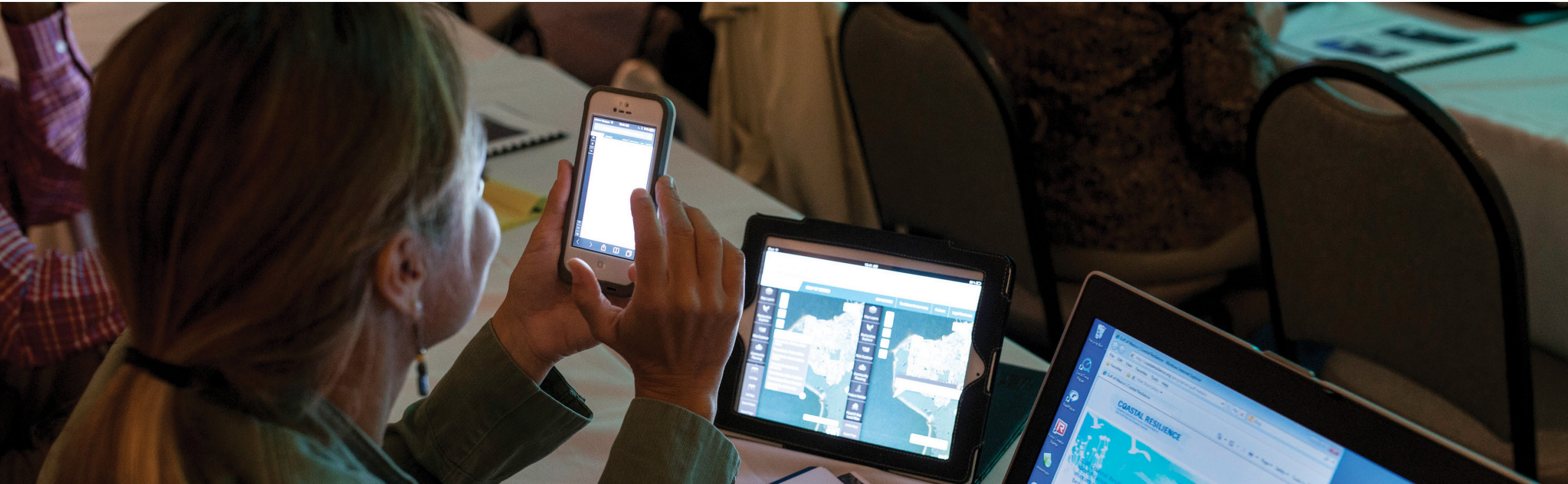
RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



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

PEOPLE AND NATURE THRIVE WHEN WE...

## KEEP Confidential Information Safe and Respect Privacy

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

### AT TNC, WE...



Use TNC confidential data with care and for **legitimate business purposes**.



Maintain the integrity of and **protect confidential information** by following applicable policies and procedures.



**Conduct due diligence** on third parties who will receive confidential information from us.



**Immediately report** any suspected incidents of inappropriate access to or use of confidential information to the [Helpdesk@tnc.org](mailto:Helpdesk@tnc.org).

FOR INTERNAL USE



POLICY & PROCEDURES



RESOURCES



JOB AIDS

### VALUES IN ACTION

At work, we should always think about keeping confidential information safe, including personal data. For example, when discussing confidential information, make sure that you are in a private place where others are not likely to overhear you. And 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.

### A CLOSER LOOK

Confidential information includes Personal Data about our donors, partners and staff. We provide a Privacy Notice to let individuals know why we collect their personal data, how we use it, share it, and protect it. Information about projects on the horizon, including discussions with potential new partners is also confidential.

#### To keep confidential information safe:

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





ASK A QUESTION OR  
REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



© 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 defines who we are as an organization. Understanding how to identify it, allows us to keep it safe at all times. While we will share our Intellectual Property resulting from our programmatic work to serve global conservation objectives, we safeguard our work so that we can control our property and ensure it is being used properly. We also safeguard our work to ensure we are not infringing on anyone else's rights.

### AT TNC, WE...



Know how to **identify intellectual property** and safeguard it every day.



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 is intellectual property and if 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, we must ensure those partnerships are reviewed and approved to protect our brand. We also respect the Intellectual Property of others and we use images, music, and brands of others only with their permission.

### A CLOSER LOOK

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

#### **Some examples of TNC Intellectual Property include:**

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





ASK A QUESTION OR REPORT A CONCERN

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT EACH OTHER

RESPECT THE WORLD AROUND US

ACT WITH INTEGRITY

SAFEGUARD OUR REPUTATION

OUR COMMITMENT



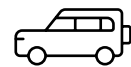
© AMI VITALE Ecotourism guide. Sam Brown and TNC's Projects Manager — Africa Region, Chantal Migongo-Bake, review a map of the Loisaba Conservancy in northern Kenya. Loisaba brings together local communities, government, private enterprise and NGOs as a model for community development and conservation programs that can be replicated throughout Africa.

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, or abuse is a critical responsibility for all of us. As stewards of TNC, we protect our physical assets as well as our financial assets and technology and information systems.

### AT TNC, WE...



Take care of all **physical property** that belongs to TNC—from vehicles owned by the organization to livestock, office space and equipment used in our research and business operations.



Demonstrate **good judgment** whenever using TNC's information and technology systems.



Use information and technology systems primarily for business purposes and limit personal use to **less than 10%** of total use.

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 resourcefully. When we treat what belongs to TNC with the same care with which we treat our own personal belongings, we foster a respectful culture.

### A CLOSER LOOK

There are actions we can all take to protect the integrity of our assets.

#### For example:

- Maintain and operate TNC vehicles responsibly.
- Store and maintenance 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 that is not approved by TNC.
- Use strong passwords.
- Follow instructions from IT to protect our systems and data.





# Our Commitment

At TNC, people and nature thrive when we follow this Code and seek guidance whenever we have questions.

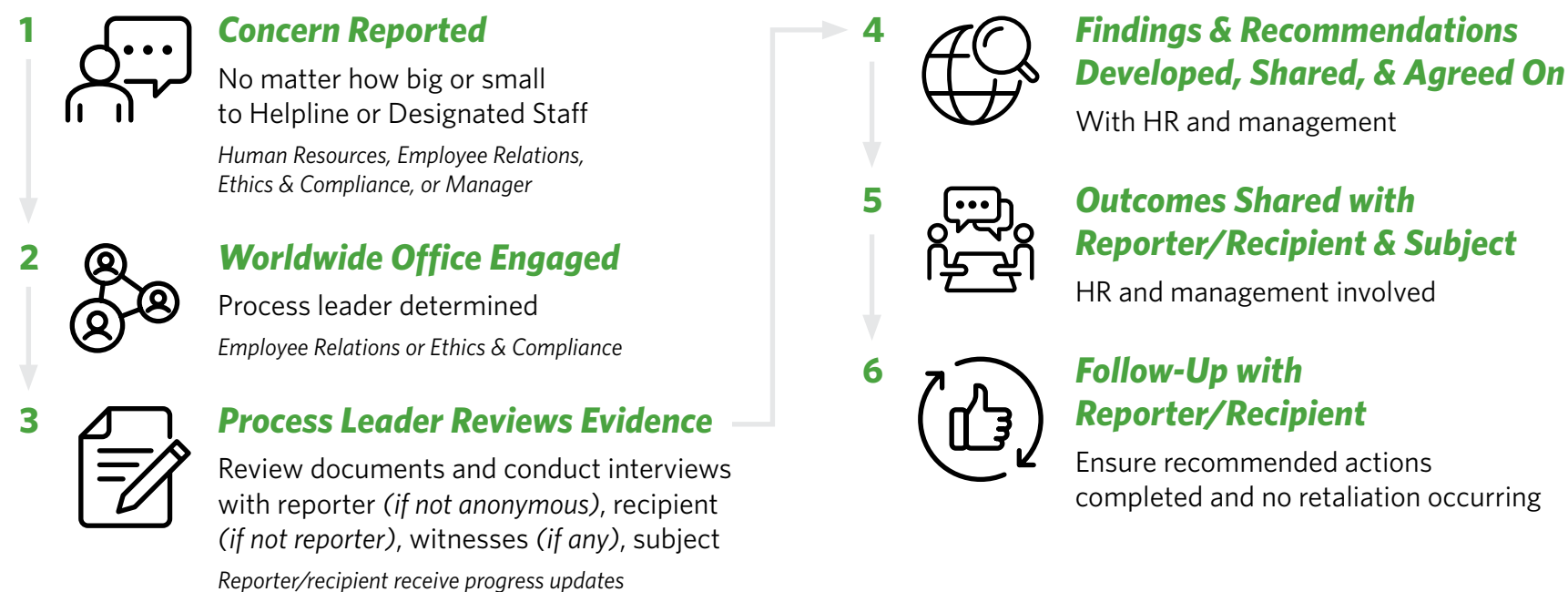
We are all responsible for speaking up if something does not feel right or if we have concerns about ethical misconduct, including if we witness inappropriate behavior or violations of our Policies and SOPs.

## WHAT HAPPENS WHEN I MAKE A REPORT?

There are many people at TNC for employees and third parties to reach out to if you want to ask a question or need to report a concern about misconduct or potential misconduct. If you are an employee, you can contact your manager, another TNC supervisor, a member of the Ethics & Compliance team or a member of our People Team.

Employees and third parties may contact the Ethics & Compliance team anytime to submit a question or concern at our online Helpline, [www.nature.org/tnc Helpline](http://www.nature.org/tnc Helpline). The TNC Helpline is available online or by phone 24 hours a day, seven days a week in a variety of languages. Questions and concerns may be submitted anonymously. If you call the Helpline, you will speak with a third-party agent who will document the concern and confidentially forward it to the Ethics & Compliance Team. If you submit a question or concern online, it comes directly to the Ethics & Compliance Team.

## WHAT HAPPENS WHEN I REPORT A CONCERN?



## WHAT HAPPENS IF SOMEONE RETALIATES AGAINST AN EMPLOYEE BECAUSE THEY MADE A REPORT?

TNC will not tolerate retaliation against individuals who ask questions or raise concerns about potential misconduct in good faith. We expect everyone at TNC 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 verbal harassment and intimidation—including taking adverse employment actions such as demoting someone or discouraging someone from seeking a promotion—to more subtle forms such as not inviting someone to a group outing, speaking poorly about a person to other colleagues, providing fewer opportunities for personal development or underutilizing a person who is capable of more significant contributions. If we find evidence of retaliation, 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 concerns and issues arise and holding individuals who violate our Code, Policies and SOPs accountable for their actions.

**!** *Employees and third parties can contact the Ethics & Compliance team 24/7 in multiple languages at [nature.org/tnc Helpline](http://nature.org/tnc Helpline) and be anonymous if you choose.*