

## **ETHICAL CONDUCT**

Watipa expects its staff, interns, volunteers, and trustees, as well as any consultants, partners and members around the world, to conduct their working lives professionally and lawfully.

Breaches of this code will be dealt with through a disciplinary procedure and brought to the attention of the Board of Trustees.

### **Fraud**

Fraud includes deception, theft and dishonest conduct, such as lying or concealing information. Any Watipa member who identifies fraud (actual or potential) should immediately report it to the CEO of Watipa. Any reports of this nature made to the CEO will be reported to the Board of Trustees.

### **Personal Involvement and Conflicts of Interest**

Watipa encourages volunteers, members, interns and trustees to take an active part in the life of their community; however, they should avoid putting themselves in a position where their personal interests might conflict with their responsibility to Watipa.

The Board of Trustees review and update a risk register at each meeting, noting any potential or actual conflicts of interest.

### **Gifts and Hospitality**

It is a serious offence for a Watipa trustee or CEO or member to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything, or showing favour or disfavour to any person in their official capacity. If an allegation of this nature is made, it is for the person accused to prove that any such rewards have not been inappropriately obtained.

### **Non-harassment**

Watipa strives to provide and cultivate an environment that is free of all conduct that can be considered bullying, harassing, abusive or offensive. This policy applies to conduct that takes place in any Watipa-related context, including conferences, functions, social events and overseas travel. No one associated with Watipa at any level should be subjected to any form of harassment. Any form of harassment, whether sexual or otherwise, is prohibited at any time.

Harassment is defined as any improper or unwelcome conduct (verbal or physical) that has or might reasonably be expected or perceived to cause direct or indirect offence or humiliation to another person.

Sexual harassment is defined as: any unwelcome sexual advance, unwelcome request for sexual favours, or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances. Sexual harassment can also include behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene

communications. Behaviour that is based on mutual attraction, friendship and respect is not sexual harassment.

Other forms of harassment include harassment based on race, ethnicity, religion, national origin, ancestry, sexual orientation, gender, medical condition, disability, civil status or age is also prohibited. This type of harassment may include but is not restricted to derogatory comments about a person's ethnic heritage, racial background, sexual orientation, religious beliefs, disabilities or age; and the display of objects or printed materials that are degrading to members of particular racial, ethnic, religious or age groups or to persons with disabilities.

Any associate of Watipa who feels they are the subject of sexual harassment should take (and be supported to take) firm, positive and prompt action. Where possible, this could include telling the offending person that their actions are unwelcome and offensive, and that it needs to stop immediately. If it is difficult to approach or speak to the person directly, it is perfectly acceptable to ask someone else to intervene on their behalf. If the harassment continues, the associate of Watipa should document all incidents of harassment in order to provide the fullest basis for an investigation.

Any associate of Watipa who believes that they have been harassed (or has reason to believe that a colleague is or has been the subject of harassment) is encouraged to report the incident to the CEO. Watipa will promptly investigate any complaint of harassment in accordance with disciplinary procedures.

Confidentiality will be observed throughout and the need for any disclosure of the details of the case will be discussed and agreed. Harassment is a serious offence and any complaint must be filed honestly and in good faith. False accusations may lead to disciplinary action.

### **Breaches of Ethical Conduct**

If any significant wrongdoing, actual or suspected, comes to the attention of a Watipa member, they should report it immediately to the CEO. Examples of wrongdoing include theft, fraud, other illegal activity, false accounting, danger to health and safety, or other serious ethical breaches.

The CEO will report any incidents raised to the Board of Trustees.

If any reports should be made about the actions of the CEO of Watipa, they should be reported to the named Data Controller of Watipa, who will report the incident in an extraordinary meeting of the Board of Trustees.