

**CODE OF
CONDUCT**

| *People and Nature
Thrive When We...*



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A Message from our CEO on The Nature Conservancy's Code of Conduct

DEAR TNC COLLEAGUE,

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—now more than ever—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,



Jennifer Morris
Chief Executive Officer



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A Note from Our Chief Ethics, Compliance & Privacy Officer

DEAR TNC COLLEAGUE,

Since joining The Nature Conservancy in 2019, I have been impressed by your dedication to and passion for our mission and your commitment to put our values into action to make The Nature Conservancy's working environment as great as the conservation work we perform around the world.

Our Code of Conduct is the bridge between our values and our policies and procedures. Our Code provides each of us, regardless of where we sit in the organization or how we interact with TNC, with affirmative actions that we can take to demonstrate our commitment to act with integrity in all we do and live our values so that we can make the greatest impact for conservation possible.

My team and I are here to help you navigate the challenges and ambiguous situations that you might face in our work and to help ensure that our behaviors align with our values. You can Ask a Question or Report an Issue through our helpline and we will be there to assist.

Thank you for your commitment to our Code of Conduct. I am delighted to be a part of this wonderful organization and to have the chance to work with each of you towards our common goal of protecting the land and waters on which all life depends while making The Nature Conservancy a respectful, inclusive and safe place to work.

Sincerely,



Michelle Beistle
Chief Ethics, Compliance and Privacy Officer



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People and Nature Thrive When We...

COMMIT TO OUR VALUES

- » Integrity Beyond Reproach
- » Respect for People, Communities and Cultures
- » Commitment to Diversity
- » One Conservancy
- » Tangible, Lasting Results



© IAN SHIVE

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, board members, trustees, donors, and volunteers at all TNC programs, business units, and affiliates. Every person 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 we take violations seriously.

Respect Each Other

PEOPLE AND NATURE THRIVE WHEN WE...

BEHAVE PROFESSIONALLY AND RESPECTFULLY



© JEROD FOSTER

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 avoid interactions that involve sexual overtones or jokes that are based on how we are different, or assumptions based on biases related to stereotypes around our differences

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

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 include:

- Jokes about gender or sexual orientation.
- Actions or statements that exclude or suggest second class status because of gender or sexual orientation.
- Sending or discussing inappropriate emails, pictures, or messages.
- Unwelcome physical contact or physical intimidation 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.

PEOPLE AND NATURE THRIVE WHEN WE...

COMMIT TO DIVERSITY, ACT FAIRLY AND LEVERAGE OUR DIFFERENCES



© TIM CALVER

Our differences support innovation and can bring out the best in us. Our success depends on our ability to learn from one another's strengths and differences. We treat everyone with respect when we take the time to understand their background and beliefs, so we know what respect looks like to them.

AT TNC, WE...

- » Emphasize diversity in our applicant pools and interview panels.
- » Make employment decisions based on an individual's credentials and skills, including a diversity of perspectives and experiences.
- » Are inclusive of all people and respectfully listen to their ideas—even if they differ from our own.
- » Seek to learn new ideas from people with varying experiences and perspectives.

Values In Action

Our diversity offers opportunities for working more effectively together. Approaching differences as opportunities while assuring Inclusion is important when we work with one another 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.

A Closer Look

Both our values and the law are designed to protect individuals from being treated unfairly based on *unique personal characteristics* such as:

- Race, color, national or regional origin,
- Religion,
- Age or disability,
- Sex, sexual orientation, or gender identity, or
- Military or veteran status.

PEOPLE AND NATURE THRIVE WHEN WE...

ENGAGE IN QUALITY CONVERSATIONS



© KEVIN ARNOLD

When we improve the quality of conversation, we improve relationships, innovation, and results. 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.

AT TNC, WE...

- » Listen to understand rather than only to agree, disagree or fix.
- » Demonstrate respect for others by sharing appropriate, relevant information.
- » Bring 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 and common goals to improve connection and accelerate learning.
- » Recognize and respect our different communication styles and ways of understanding based on our experiences, identities, organizational roles and professional backgrounds.

Values In Action

Connecting to 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 like to 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.

Respect the World Around Us

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT ALL COMMUNITIES



© AMI VITALE

At TNC, collaboration with communities throughout the world enables us to accomplish our mission. We recognize the importance of support and input from local communities and indigenous peoples in the decisions we make and how we move forward. We demonstrate respect for all local populations and cultures, wherever we operate.

AT TNC, WE...

- » Work together and with others, across borders and cultures, to better understand the challenges we face in the world and to develop the best solutions to solve them.
- » Partner with local communities to ensure that we are always respectful of our differences and that our actions do not create harm.
- » Avoid situations that could lead to exploitation of vulnerable populations.
- » Strive to advance gender equity and equity for vulnerable populations in our work.

Values In Action

We create thoughtful and collaborative solutions with long-term impact when we respect different practices and customs. Learning about local communities allows us to better understand how to demonstrate respect and consideration across cultures.

A Closer Look

TNC works in all 50 of the United States and across the world in over 70 countries. We influence people in communities large and small through a Shared Conservation Agenda that prioritizes projects in our key areas of conservation. We develop and implement these projects in communities with diverse priorities and needs. By considering the community's priorities and needs, we can identify common areas that, when addressed collaboratively, lead to successful conservation work.

PEOPLE AND NATURE THRIVE WHEN WE...

RESPECT AND SUPPORT THE FURTHERANCE OF HUMAN RIGHTS



© BRIDGET BESAW

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.

AT TNC, WE...

- » 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.
- » 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 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 exploitation. They can also include situations where specific indigenous 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.

PEOPLE AND NATURE THRIVE WHEN WE...

ACT SUSTAINABLY IN OUR WORK



© CARLTON WARD JR.

At TNC, ensuring that we operate in an environmentally sustainable way is an important part of our mission of conserving the lands and waters on which all life depends. It's also what we expect from ourselves and what our members, donors, and external partners expect of us as well. 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.
- » 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 support no or low emission modes of commuting and promote events, such as the Green Commuter Challenge, to provide our staff with opportunities to demonstrate our commitment to sustainability in our operations. We appreciate that our global reach results in significant travel by air, with consequences on the environment. We will work to mitigate the impact of business travel through appropriate offset measures, including, for example, use of video conferencing as a substitute for in-person meetings. We strive to minimize our carbon footprint by using renewable sources of energy and working in energy efficient buildings. We also support nature through sustainable waste and composting practices at many of our facilities.

Act with Integrity

PEOPLE AND NATURE THRIVE WHEN WE...

FOLLOW APPLICABLE LAWS AND REGULATIONS AND AVOID FRAUD, THEFT AND CORRUPTION



© JEFF YONOVER

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 comply with all laws around the world, which govern bribery and corruption. We implement policies, procedures and controls to help us detect and prevent money laundering and the financing of terrorist activities.

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

Values In Action

Providing gifts, entertainment or hospitality in the course of conducting business can be customary and lawful in certain parts of the world. But exchanging items of value can often be perceived as bribery. And a bribe does not always have to involve money, it could be doing a favor for the third party such as hiring their family member to work for TNC. 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.

A Closer Look

There are more stringent rules that apply when we work with government officials, including individuals working for companies that are partially or wholly owned by the government. TNC can be held accountable for the actions of 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.

PEOPLE AND NATURE THRIVE WHEN WE...

ACT AS GOOD STEWARDS OF ALL FUNDING AND DONOR MONEY



© MAC STONE

We use public and private funds, in whatever form, only to further TNC's mission. 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.

AT TNC, WE...

- » Act responsibly with our business expenses and are mindful of our commitment to steward the resources of our donors and TNC 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.
- » Seek guidance from Finance and Development if we have questions about how we should use or record a gift or grant.

Values In Action

It is our responsibility as a charitable organization to ensure we honor the intended use of donor funds. This is both an ethical choice and a commitment to respecting the trust of our donors. Likewise, the specifications of funds provided to us through grants must always be followed.

A Closer Look

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.

PEOPLE AND NATURE THRIVE WHEN WE...

STAY SAFE AND KEEP OTHERS SAFE



© CARLTON WARD JR.

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 that our workplace remains free from violence, as well as from drug and alcohol abuse. It is also important to take appropriate safety precautions when working on our preserves, with or around youth, and in remote or dangerous locations.

AT TNC, WE...

- » Know and comply with the safety rules and precautions that apply to the work we do.
- » 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.
- » Recognize that work in remote or dangerous locations or on preserves can present unique safety risks and take appropriate steps to prevent harm.
- » Understand and follow all safety procedures, including those for travel, vehicle, fire management, boating, diving, firearms and youth.

Values In Action

We take safety 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

Our conservation work often takes us to dangerous or remote locations. To avoid serious injury or worse, it is important to plan and be prepared for potential security, safety, and medical risks. We provide internal and external resources to help our staff and partners stay safe when doing TNC work.

PEOPLE AND NATURE THRIVE WHEN WE...

AVOID CONFLICTS OF INTEREST



© KEVIN ARNOLD

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.

Values In Action

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

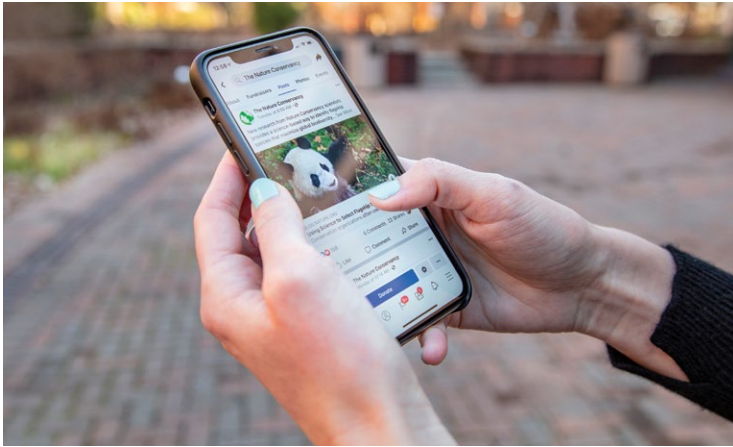
Here are some examples of situations where conflicts are likely to arise:

- 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.

Safeguard Our Reputation

PEOPLE AND NATURE THRIVE WHEN WE...

TAKE CARE WITH SOCIAL MEDIA AND PUBLIC STATEMENTS RELATED TO TNC



© ALEX SNYDER/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 are our own beliefs and not the beliefs of TNC, unless our communication is made on behalf of and approved by TNC.

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 a number of 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.

PEOPLE AND NATURE THRIVE WHEN WE...

PRESERVE OUR CHARITABLE STATUS



© IAN SHIVE

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, as well as our lobbying and political activities.

AT TNC, WE...

- » Comply with the lobbying laws and regulations that apply to the work we do for TNC and avoid excessive lobbying.
- » Keep track of all time and related lobbying resources in compliance with our Policies and Procedures.
- » 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.
- » 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

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. This means not using any TNC resources (such as email, office space, or time) or wearing TNC-branded clothing to advocate for any candidate. 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. It is important that we do not lead anyone to believe we are speaking on TNC's behalf in any political context.

PEOPLE AND NATURE THRIVE WHEN WE...

KEEP CONFIDENTIAL INFORMATION SAFE AND RESPECT PRIVACY



© CARLTON WARD JR.

During the course of our work for TNC, we come into contact with confidential information, including personal data about our employees, donors and partners. It is our obligation to respect the privacy of the person whose personal data we collect or have access to by limiting the amount of data we collect and by protecting it. We comply with laws that apply to the collection, storage, and use of personal data everywhere we do business. Additionally, we must keep all confidential information about our work for TNC safe at all times.

AT TNC, WE...

- » Share personal information inside or outside the organization only with those who need to know and who promise to protect the information.
- » Use confidential information only in the course of our work on behalf of TNC—and not for personal reasons.
- » Never discuss or share confidential information that we learn about in our work for TNC with anyone outside TNC or with anyone within TNC who does not have a business reason to discuss it.

Values In Action

At work, we should always think about keeping confidential information safe. 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.

A Closer Look

Confidential information can include:

- Information about our donors and partners,
- Information about our staff,
- Projects on the horizon, or
- Discussions with potential new partners.

PEOPLE AND NATURE THRIVE WHEN WE...

SAFEGUARD INTELLECTUAL PROPERTY



© NICK HALL

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.

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.

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

Some examples of TNC Intellectual Property include:

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

PEOPLE AND NATURE THRIVE WHEN WE...

PROTECT TNC'S ASSETS AND USE INFORMATION SYSTEMS RESPONSIBLY



© AMI VITALE

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 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.

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 information and technology systems—from how we communicate to how we keep information safe. For example:

- 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.



© SAM LAWRENCE/TNC PHOTO CONTEST 2019

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/tnchelpline. 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 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.

Employees and third parties can contact the Ethics & Compliance team 24/7 in multiple languages at nature.org/tnchelpline and be anonymous if you choose.