



# THE NATURE PARKS WAY CODE OF CONDUCT

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*Phillip Island*  
**NATURE  
PARKS**



January 2026

[penguins.org.au](https://penguins.org.au)

# ACKNOWLEDGMENT OF COUNTRY

*We acknowledge the Bunurong as the Traditional Owners of the land on which we live, work, and learn. We pay our respects to their Elders, past and present, and recognise their role in caring for Country over thousands of years. We also acknowledge their continuous connection to the land, water, sea, and sky on Milawul.*

Artwork by: Adam Magennis





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# A MESSAGE FROM THE CEO

*Our team is united in our contribution to the Nature Parks Vision: An island haven where nature and people thrive together. We are passionate and driven in all that we do and our staff, volunteers and partners that make up our team are integral to achieving our goals. I am immensely proud of our team and our collective achievements to date and am excited by the future we can create together.*

We have great foundations to work from and our Code of Conduct will help each of us set the tone to ensure that the Nature Parks is a safe, inclusive, respectful, and inspiring environment that celebrates diversity in all its forms.

We are very privileged to work, learn and live on Milawul (Phillip Island) on the lands of the Bunurong and our role in caring for country and storytelling pays homage to the rich traditions of the Bunurong culture. Working with and learning from Traditional Owners and our First Nations community will continue to play a critical role in our future, and you will see this intent woven throughout our Code.

Our Code both celebrates and shapes our culture by setting out the values which we live by and linking these values to the procedures that define the workplace expectations for each of us. This is our handbook for how we work together and how we represent the Nature Parks and the public sector with pride.

I am very pleased to introduce our Code to our team members, both new and established and I look forward to growing our shared understanding of how we work together to create a place where conservation and ecotourism excellence inspire people to actively protect the environment.

I encourage you to reach out to your leaders to learn more about our Code and how it can assist you.



# OUR FOUNDATIONS

## *Our Vision*

An island haven where nature and people thrive together.

## *Our Values*

Our Values are what we stand for as an organisation, and how we promise to deliver on our Vision. They guide how we operate, how we make decisions, and how we act on those decisions.



### **NATURE CONSERVATION IS PARAMOUNT**

- We consider nature first, we are guided by Bunurong, our decisions are research led, and we choose sustainable options.



### **ENGAGING EXPERIENCES**

- We delight in sharing nature's wonder, we are welcoming and inviting, and we have fun while we work.



### **FUTURE FOCUSED**

- We plan for profit, we take initiative, embrace change and always look for better ways to deliver.



### **DELIVERING OUTCOMES TOGETHER**

- We are inclusive, open and transparent. We build trusted partnerships by delivering on promises.

# LIVING OUR CODE

*We all play an integral role in shaping our culture.*

Our Code governs how we show up at work. **It is the roadmap of the policies and procedures** under which we operate and is **strongly guided by our values.**



**Our Code guides our decision making and behaviour** to shape a culture grounded in ethical conduct; this makes the Nature Parks a great place to work and ensures we meet the high standards the community expects of us and we expect of each other.



Our Code applies to everyone, from our CEO to field staff, from boardroom to partners and suppliers. **It applies to everyone, everywhere, all of the time.**



## HOW TO LIVE OUR CODE

Our reputation for acting ethically and responsibly is built **one decision at a time, every day, by each of us.**

### BY FOLLOWING OUR CODE YOU

- act with integrity and respect.
- use ethical decision-making including impartiality.
- comply with policies and procedures.
- show accountability.
- demonstrate leadership.
- do the right thing even when no one is looking.

### LEADERS PROVIDE GUIDANCE BY

- modelling positive behaviour and inspiring others to embrace our Code.
- fostering a culture of trust through connection, accountability and respect.
- celebrating, rewarding and recognising growth, efforts and achievements.
- creating a collaborative and cohesive environment where employees feel comfortable to speak up and be their authentic self.

## WE ARE PART OF THE PUBLIC SECTOR

Phillip Island Nature Parks is a Victorian Government statutory authority and operates under *the Crown Land (Reserves) Act 1978*. As such, we are bound by a range of Victorian laws, regulations, policies, codes of conduct and guidelines that govern the operations of all public entities. Collectively, they aim to ensure the effectiveness, transparency, and financial accountability of the public sector.

We are bound by both our Code and the Code of Conduct for Victorian Public Sector Employees. Our Code supplements the Victorian Public Sector values (Responsiveness, Integrity, Impartiality, Accountability, Respect, Leadership, and Human Rights).

# IN OUR WORKPLACE

The Nature Parks creates and promotes an environment that is **inclusive of all people** and their unique abilities, strengths, and differences.

*We recognise the values, diversity of culture, beliefs, practices, customs, physical and intellectual abilities, and life experiences of individuals.*

## WE ARE COMMITTED TO

- Ensuring our workplace is free from unlawful discrimination.
- Valuing and upholding the **Charter of Human Rights and Responsibility**.
- Creating opportunities for First Nations peoples through our **Aboriginal Employment Strategy**.
- Creating opportunities for segments of the community who have experienced disadvantage to join our team through our **Special Measures Procedure**.
- Welcoming, recognising and celebrating the characteristics that make each of us unique.
- Driving gender equality through our **Gender Equality Action Plan**.
- Acting ethically by adhering to the **Victorian Government Social Procurement Framework**.



*'Being part of an inclusive team means I can be my authentic self.'*

*'A truly inclusive workplace means there is never an "us" versus "them" mentality. Everyone is equally valued and respected.'*

*'In a workplace free from discrimination, I feel secure and appreciated for who I am.'*

*'I can come to work and do my job without the unfair colonial load that others sometimes place on me.'*

## INCLUSION IS BUILT BY ALL OF US

Our workplace strives to create an environment where everyone feels safe, respected and included. Every one of us actively contributes to this goal and as a result we:

### EMBRACE DIVERSITY

Acknowledge the unique qualities in each of us, both visible and invisible, that define who we are.

### COMMUNITY RESPECT

Respect the communities where we live, work, and learn.

### RESPECTFUL DIALOGUE

Value diverse opinions and share views inclusively and respectfully.

### DIVERSE WORKFORCE

Strive to attract, develop, and retain a diverse workforce that reflects our served communities.

### SAFETY FIRST

Keep each other safe by responding to or reporting behaviour that doesn't align with our values.

### FAIR TREATMENT AWARENESS

Recognise that treating everyone the same may lead to different or unequal outcomes for some.

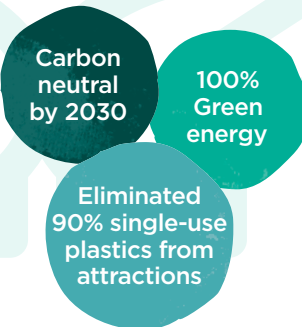


*By caring for the environment, we demonstrate our commitment to conservation.*

Our vision - **an island haven where nature and people thrive together.**

*We respect nature, embrace sustainability and extend care to wildlife and its habitat.*

*We commit to conservation today and prepare for the conservation challenges of tomorrow.*



**OUR COMMITMENTS TO ANIMAL WELFARE EXIST UNDER FOUR PILLARS**

**PILLAR 1**  
Animal welfare commitments for **WILDLIFE TOURISM**

**PILLAR 2**  
Animal welfare commitments for **WILDLIFE CONSERVATION PROGRAMS**

**PILLAR 3**  
Animal welfare commitments for **NATIVE WILDLIFE CARE, RESCUE, REHABILITATION, AND RELEASE**

**PILLAR 4**  
Animal welfare commitments for **CHURCHILL ISLAND FARM ANIMALS AND CONSERVATION DOGS**



As someone who works for or on behalf of the Nature Parks, I will:

- DELIVER CREDIBLE MESSAGES:**  
**DELIVER** credible and impactful conservation and sustainability messages that leave visitors informed and inspired to act for nature.
- REPORT CONCERNS:**  
**REPORT** any concerns regarding animal welfare or environmental harm within our sites and reserves to my leader or the ranger on call.
- ENGAGE IN RESPONSIBLE WILDLIFE WATCHING:**  
**ENSURE** uninterrupted animal behaviour, creating authentic, responsible, and respectful wildlife experiences for visitors.
- INTERACT WITH ANIMALS AS PERMITTED:**  
**INTERACT** with captive and wild animals in a manner reflective of my training and permission to perform.
- TREAT WILDLIFE WITH CARE:**  
**ALWAYS** treat wildlife and the environment with compassion, care, and respect.
- FOCUS ON SUSTAINABILITY:**  
**ALWAYS** choose sustainable options, use the right bins and be a conscious consumer.
- DELIVER APPROPRIATE ANIMAL CARE:**  
**ENSURE** that, when directly responsible for animal care, it meets the emotional and physical needs specific to the species.
- CONTROLLED DOCUMENT HUB**  
30-Year Conservation Vision  
Animal Welfare Policy  
Injured Wildlife Protocols

# ‘Yannin nerlingo and tartbanerra for Bunurong Bik Bik - Come along and care for Bunurong Land’

The Traditional Lands of the Bunurong encompass the land, sea, waters, and sky of which we live, work, and learn.

*It is our shared responsibility and privilege to treat Bunurong Country and the cultural sites within it with care and respect.*

As someone who works for or on behalf of the Nature Parks, I will:

### SEEK APPROVAL:

**ENSURE** cultural heritage assessments, permits and approvals are in place when undertaking land management activities.

### ACKNOWLEDGE COUNTRY:

**RECOGNISE** Bunurong Country through sharing acknowledgements and language in respectful and permitted ways and inquiring about a Welcome to Country and Smoking Ceremony when organising events.

### RESPECT CULTURAL SITES:

**RESPECT** culturally significant sites by undertaking only approved and appropriate actions in those areas.

### EDUCATE MYSELF:

**PARTICIPATE** in awareness activities, attend events and actively seek information to improve my knowledge.

### PRESERVE AND REPORT FINDINGS:

**STOP** work in the area, leave artefacts where they are found and report findings to the Reserves Manager.




### BUILD SAFE AND RESPECTFUL RELATIONSHIPS:

**THROUGH** listening, yarning and working together.



### CONTROLLED DOCUMENT HUB

The Nature Parks offers opportunities for all staff to participate in cultural learning activities and events. **LEARN** more on the [Reconciliation page](#) on the Burrow.

-  Reconciliation Action Plan
-  Nature Parks Style Guide
-  Engagement Strategy

# We are better when we work well together.

The Nature Parks is committed to ensuring that **all employees are treated fairly and equitably** and takes a **zero tolerance approach to unlawful conduct** in the workplace.



As someone who works for or on behalf of the Nature Parks, I will:

### TREAT EVERYONE EQUALLY:

**NEVER** engage in unlawful conduct towards other employees, visitors or clients, or others who I come into contact with over the course of my employment.

### AVOID GOSSIP AND STEREOTYPES:

**REFRAIN** from gossiping or spreading rumours about the personal lives or working conditions of others and from comments which stereotype or generalise others.

### CALL OUT OR REPORT UNLAWFUL CONDUCT:

**IF SAFE** to do so, immediately call out unlawful conduct and/or report to my leader or the People and Culture department.

### ADDRESS UNCONSCIOUS BIAS:

**IDENTIFY**, challenge, and resolve personal or team's unconscious biases.

### DEMONSTRATE INCLUSIVE BEHAVIOUR:

**TREAT** others with dignity, respect and courtesy.

### Unlawful conduct can manifest as:

#### DIRECT DISCRIMINATION:

When a person with an attribute is treated or is proposed to be treated unfavourably because of that attribute.

#### INDIRECT DISCRIMINATION:

When rules, practices or policies are applied equally but have a disproportionate impact on those with particular attributes.

#### SEX DISCRIMINATION:

When someone is treated unfairly, or is unreasonably disadvantaged because of their sex, or a characteristic that is generally relating to people of that sex.

#### HARASSMENT:

Any form of behaviour that intimidates, humiliates, vilifies or offends another person or makes the workplace uncomfortable and unpleasant, and which happens because of an attribute.

#### BULLYING:

Repeated, unreasonable, behaviour directed towards an individual or group that creates a risk to health and safety.

#### VICTIMISATION:

When an employee victimises another employee for making a complaint regarding work-related matters, the work environment or the behaviour of others in the workplace, including unlawful conduct.

#### OCCUPATIONAL VIOLENCE AND AGGRESSION:

Any work-related incident where a worker is abused, threatened, or assaulted by clients, the public, or coworkers, including physical, verbal, or psychological harm.



### PROTECTED ATTRIBUTES

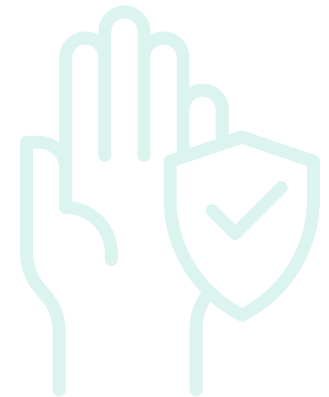
There are 17 categories of protected attributes. Protected attributes are personal characteristics protected by law.

Learn more about the protected attributes [here](#).

### CONTROLLED DOCUMENT HUB



Respect at Work Procedure  
Diversity and Inclusion Policy



# We act with safety in mind.

We foster a **culture where safety is inherent**, and a commitment to continuous improvement is embedded into our daily work practices.

We look out for the **safety of ourselves and others** and foster a safe environment for all.

We uphold the **rights of all children**.



We have a free, confidential and wide-ranging Employee Assistance Program available to volunteers and our employees and their families. You can reach Acacia on 1300 364 273.

Learn more on the wellbeing page on the **Burrow**.

As someone who works for or on behalf of the Nature Parks, I will:

### ACT IMMEDIATELY:

**CEASE** work immediately if it becomes unsafe to continue and where a serious or immediate risk of injury exists, promptly notify my leader or the Chief Warden.

### COMPLY WITH INSTRUCTIONS:

**FOLLOW** reasonable instructions, processes, and procedures in relation to health and safety and utilise resources and equipment for their designated purposes.

### PRIORITISE HEALTH AND SAFETY:

**TAKE** reasonable care for my health and safety in the workplace and for the health and safety of others who may be affected by what I do or don't do.

### NOTIFY IMMEDIATELY:

**IMMEDIATELY** notify my leader or the Chief Warden upon sustaining a physical or psychological injury and be a willing driver of my recovery and return to work process.

### SEEK SUPPORT:

**SEEK** support by notifying my leader or the People and Culture department where I sustain a non-work related physical or psychological injury or condition which impacts my ability to perform in my role.

### REPORT INCIDENTS:

**IDENTIFY** and report workplace incidents, hazards and injuries or contact my Health and Safety Representative.

### REFRAIN FROM DRUG AND ALCOHOL USE:

**REFRAIN** from attending work if I am under the influence of drugs or alcohol.

### SAFEGUARD ALL CHILDREN:

**ALWAYS** foster a safe environment for children and promptly report any child safety concerns or suspicions to my leader or Child Safety Advisor.

### ADHERE TO AUTHORISED ACTIVITIES:

**ONLY** perform activities for which I am adequately trained and authorised.

### CONTROLLED DOCUMENT HUB



- Occupational Health and Safety Policy
- Drug and Alcohol Procedure
- Injury Management and Return to Work Procedure
- Child Safety and Wellbeing Procedure
- Emergency Management Plan

# How we show up demonstrates our readiness to work.

## WAYS OF WORKING

We value **our innovative, collaborative and connected culture** where we have flexibility to engage in a way which works for individuals and our team.

Our attire and presentation, use of resources and ways of working **vary based on the activity we are undertaking.**

*Regardless of the activity we participate in, we always present ourselves in a manner which conveys a positive and professional image.*



As someone who works for or on behalf of the Nature Parks, I will:

### BE PROFESSIONAL:

**ALWAYS** show up with a professional, clean, suitable and tidy appearance that aligns with our Uniform Presentation Standard.

### BE FULLY ENGAGED:

**PUNCTUALLY** attend, fully engage in and complete work in its entirety, including learning and development, on site and virtual obligations.

### RESPECT ACTIVITY-BASED LEARNING:

**RESPECT** activity-based working principles so I can contribute to a collaborative and productive culture.

### CONTROLLED DOCUMENT HUB



Uniform and Presentation Standard  
Learning and Development Framework

*'I know that showing up is more than getting to work on time, it's being engaged and ready to embrace the tasks that come my way.'*

*'Showing up is about about being reliable and approachable.'*

*'I make sure to check out the Burrow regularly for information that applies to me. This helps me stay connected.'*



## PRIVACY, CONFIDENTIALITY AND CYBERSECURITY

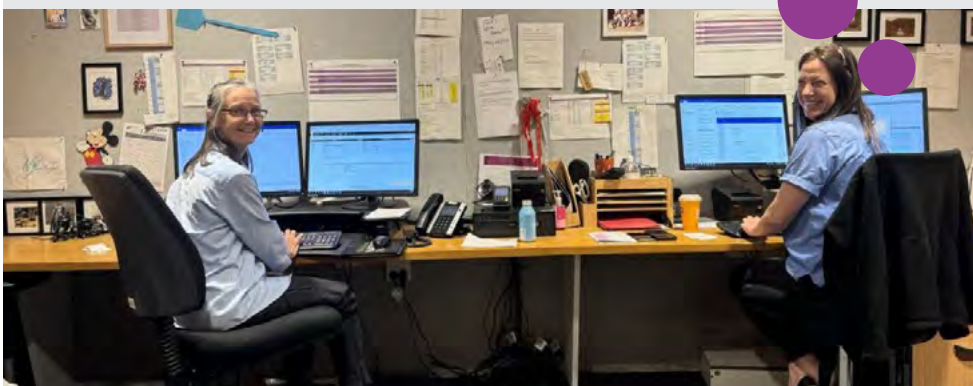
At the Nature Parks all employees have a responsibility to take reasonable and necessary precautions to **protect information relating to the Nature Parks, its visitors, suppliers, business partners and other third parties**. Employees should **presume that all of the Nature Parks information is confidential** unless there is a clear indication that the information has been publicly released by the Nature Parks and they are authorised to disclose it. Disclosure and sharing information with third parties, even if the information relates to them personally, may also be subject to freedom of information (FOI) request and approval processes.

**Inappropriate use or sharing of data** can expose the Nature Parks to **risks** such as **security breaches, theft, property loss, or reputational damage**. Therefore, it is crucial for all of us to collaborate in ensuring privacy, confidentiality, and security.

The Nature Parks is committed to **ensuring the privacy of personal, confidential or sensitive information** provided to us. We are bound by the Victorian *Privacy and Data Protection Act 2011* and the information privacy principles.

Someone who used to work at the Nature Parks contacts me asking for information which is not publicly accessible.

As the individual no longer works at the Nature Parks, I cannot provide the information they are requesting. I inform my leader about the request.



## CONTROLLED DOCUMENT HUB



ICT Management Policy  
 ICT Security Procedure  
 Privacy Procedure  
 Responsible Artificial Intelligent (AI) Procedure



As someone who works for or on behalf of the Nature Parks, I will:

### USE DATA AS INTENDED:

**ONLY ACCESS**, collect and use data that is necessary, for which I am authorised, and is strictly for legitimate business reasons.

### KEEP DATA SECURE:

**SECURELY STORE**, transmit and destroy data in accordance with applicable policies and laws.

### DISCLOSE DATA RESPONSIBLY:

**ONLY DISCLOSE** data to authorised persons who have a legitimate business reason to access it and who are obligated to protect it.

### REPORT POLICY BREACHES:

**PROMPTLY** report any policy violations, data breaches, or system risks to my leader.

### KEEP INFORMATION CONFIDENTIAL:

**ENSURE** the information I share, including on social media, does not include proprietary or confidential information about the Nature Parks or its partners.

### COMPLY WITH ICT POLICIES:

**ENSURE** all work is created and managed on company-approved systems and in accordance with applicable policies. Never utilise third-party applications without the written approval of the IT Manager.

### USE INFORMATION AS AUTHORISED:

**REFRAIN** from using information, records, or systems for unauthorised purposes.

### CONSULT MY LEADER:


**CONSULT** my leader before providing information or responding to information requests.

## RESPECT EXTENDS TO OUR WORK RESOURCES

Work resources encompass a diverse range of assets, including tangible elements such as physical property, financial resources, and electronic assets, as well as intangible resources critical to our long-term success, such as intellectual property, records, data, and confidential information.



### CONTROLLED DOCUMENT HUB

 **Motor Vehicle Terms and Conditions of Use**  
Meeting Rooms, Shared Resources, Guests, Video and Conferencing Procedure

As someone who works for or on behalf of the Nature Parks, I will:

#### USE RESOURCES AS INTENDED:

**UTILISE** the Nature Parks resources (physical and non-physical) for authorised and appropriate work purposes and not for personal use.

#### SECURE ACCESS DETAILS:

**PROTECT** usernames, passwords, PINs, and other security details from unauthorised use.

#### AVOID INAPPROPRIATE CONTENT:

**AVOID** accessing, viewing, storing, forwarding, distributing, printing, copying, or downloading threatening, violent, obscene, pornographic, racially offensive, or sexually explicit material.

#### OBTAIN APPROVAL:

**ONLY** purchase equipment, tools, assets, software or any other items with appropriate approval.

#### REPORT ISSUES PROMPTLY:

**REPORT** any issues, loss or damage to any of the Nature Parks assets immediately to my direct leader and the asset owner, such as the IT department.

#### KEEP SECURITY INFORMATION CONFIDENTIAL:

**REFRAIN** from allowing others to access or use login or security information for any purpose.

#### PROTECT INTELLECTUAL PROPERTY (IP) PROTOCOL:

**PROTECT** the Nature Parks intellectual property (IP) from improper or unauthorised use. This includes employees' work output, domain names, social media, research, branding and trademarks to the extent permitted.



# The way we communicate reflects our identity.

We are committed to providing **accurate, clear, complete, and consistent information** to everyone we connect with.

By sharing information, we **forge connections and inspire people to actively protect the environment.**



As someone who works for or on behalf of the Nature Parks, I will:

We understand our teams **take pride in their work at the Nature Parks** and value the opportunity to connect with family, friends, colleagues, and other audiences around the world through social media.



### DISCLOSE RESPONSIBLY:

**ONLY** disclose and discuss publicly available information when referring to a topic in which the Nature Parks has an interest.

We also know that **online content can live forever** and can result in unintended consequences.



### EXERCISE CAUTION:

**NEVER** imply I am authorised to speak on behalf of the Nature Parks or give the impression that any views I express are those of the Nature Parks (unless authorised to do so).

## CONTROLLED DOCUMENT HUB



Social Media Procedure

Employee Generated Content (EGC) Guidelines

### MAINTAIN PROFESSIONAL INTEGRITY:

**TAKE** care to avoid situations where comments made in a personal capacity impacts my ability to perform my role.

## PUBLIC SPEAKING AND PRESS INQUIRIES

### AUTHORISED SPOKESPERSONS:

Only authorised employees are allowed to represent or speak on behalf of the Nature Parks, provide or publish any video or written content related to the Nature Parks. This rule applies to discussions or references to the Nature Parks, whether the content is business or personal in nature.

### AUTHORISATION PROCESS:

Authorisation can only be granted by the Marketing and Communications department or the Chief Executive Officer and must be obtained prior to any communications.

### MEDIA AND THIRD-PARTY INTERACTIONS:

If contacted to discuss organisational business with any external party, including the media, refrain from providing any information directly; instead, direct them to the Marketing and Communications department at [marketing@penguins.org.au](mailto:marketing@penguins.org.au).

## SOCIAL MEDIA

We want to encourage our staff to **be active ambassadors of the Nature Parks by generating and sharing positive content** on their social media platforms while following the social media guidelines and Employee Generated Content (EGC) Guidelines.



### GOVERNMENT PROTOCOLS:

In instances where you have authorisation, it is essential to recognise that as a government agency, the Nature Parks may need to seek State Government approval before responding. Therefore, it is crucial to consult with the Marketing and Communications department before addressing any communication matters.



# We act with transparency and integrity to build trust in our organisation.

## Building trust through integrity:

Trust is built by meeting community and stakeholder expectations, being accountable, transparent, credible, and ethical.

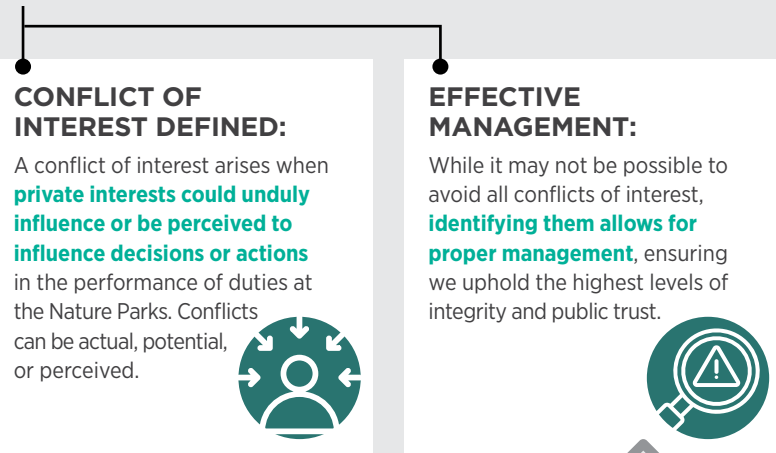
## Adhering to standards:

We adhere to legislative requirements, declare conflicts of interest, and have zero tolerance for fraud and corruption.



## CONFLICTS OF INTEREST

**Conflicts of interest are inevitable in our professional journey,** and when not disclosed or appropriately managed they can have significant personal and organisational implications.



### CONFLICT OF INTEREST DEFINED:

A conflict of interest arises when **private interests could unduly influence or be perceived to influence decisions or actions** in the performance of duties at the Nature Parks. Conflicts can be actual, potential, or perceived.



### EFFECTIVE MANAGEMENT:

While it may not be possible to avoid all conflicts of interest, **identifying them allows for proper management,** ensuring we uphold the highest levels of integrity and public trust.



When fulfilling our responsibilities, it is imperative to demonstrate that all decisions have been made in the best interests of the Nature Parks and the public, devoid of personal bias.



## CONTROLLED DOCUMENT HUB



As someone who works for or on behalf of the Nature Parks, I will:

### AVOID CONFLICTING INTERESTS:

**REFRAIN** from engaging in activities that compete or seem to compete with our interests and report any conflicts (perceived, potential or actual) to my leader or the People and Culture department.

### MAKE IMPARTIAL DECISIONS:

**ENSURE** business decisions are not influenced by personal or family interests or friendships.

### USE RESOURCES RESPONSIBLY:

**AVOID** using the Nature Parks opportunities, property, information, or resources for personal benefit or the benefit of others.

### FOLLOW FAIR HIRING PRACTICES:

**NOT** hire, supervise, or report to family members, romantic partners, or close friends or influence their employment opportunities or compensation.

### BALANCE OUTSIDE ACTIVITIES:

**NOT** engage in outside activities or employment that affects my job performance or interferes with my responsibilities in any way at the Nature Parks.

## FRAUD AND CORRUPTION

We are committed to ensuring a comprehensive and systematic approach to preventing, detecting, and responding to fraud, corruption, and other losses.

### ZERO TOLERANCE:

The Nature Parks maintains **zero tolerance for fraud and corruption**, applicable to employees, volunteers, contractors, and anyone acting on our behalf.



### SPEAK UP ASSURANCE:

Employees should **feel confident to voice concerns** regarding any suspected fraud and corruption.



As someone who works for or on behalf of the Nature Parks, I will:

### AVOID FRAUD AND CORRUPTION:

**NEVER** engage in activities considered fraudulent or corrupt.

### LEAD ETHICALLY:

**LEAD** by example, promoting an ethical and honest workplace culture.

### COOPERATE WITH INQUIRIES:

**ASSIST** with inquiries or investigations into alleged fraudulent or corrupt activities.

### REPORT SUSPECTED FRAUD OR CORRUPTION:

**IMMEDIATELY** report suspected fraud or corruption via the appropriate channels.



Fraud and corruption can present in many forms and can range from using work resources for unauthorised personal use to claiming reimbursements you are not entitled to.

### CONTROLLED DOCUMENT HUB



Fraud, Corruption Control Procedure  
Public Interests Disclosure Procedure

Fraud and corruption may manifest as:

### BRIBERY:

**PAYMENT**, whether in money or in kind, intended to induce a person to act against the interests of the Nature Parks, commonly known as bribery.

### ABUSE OF TRUST:

**DISHONEST** activity exploiting trust for personal gain or improper advantage.

### PETTY PAYMENTS:

**INFORMAL**, customary minor payments to secure or speed up a routine action.

### THEFT:

**THEFT** or improper use of money or other property and assets belonging to the Nature Parks.

### DOCUMENT MANIPULATION:

**DELIBERATE** falsification, concealment, destruction, or use of falsified documents.

If you have concerns or questions, reach out to the Nature Parks Public Interests Disclosure Officer. You can find their details in the Public Interests Disclosure Procedure.

## GIFTS, BENEFITS AND HOSPITALITY

We acknowledge that gifts, benefits, and hospitality may be directly or indirectly offered to employees from time to time.

**ACCEPTING gifts** from other organisations, contractors, or suppliers **may create an impression of influence** on decisions or actions, impacting the high expectations held by both us and the community.

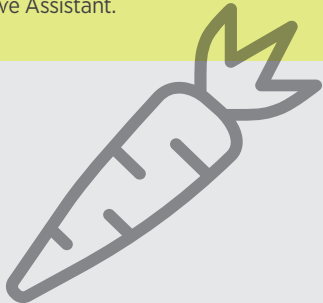
At the Nature Parks, it's best practice to **politely DECLINE gifts or hospitality**. However, **if received, it is essential to be honest and transparent** by promptly advising or declaring such offers.

### GIFTS OF APPRECIATION (TOKEN GIFTS)

**Gifts given to express thanks, valued at less than \$50**, such as a small bunch of flowers, consumables (e.g. fruit, chocolates), wine, pens, ties, scarves, and mementos, can generally be accepted.

#### When received:

**Email the CEO** with a copy to the Executive Assistant.



**If unsure about responding to an offer of a gift or benefit, seek advice from your leader or the Gifts, Benefits and Hospitality Procedure.**

### NON-TOKEN GIFTS

**Gifts valued at more than \$50** or, regardless of value, that **could be perceived by others to influence decisions**. Or gifts received over a period of time from the same individual or business if they exceed a cumulative value of \$50.

#### A BENEFIT:

**Any offer of value**, including preferential treatment, privileged access to events, or other advantage provided to an individual.

#### HOSPITALITY:

**Dining, drinks, or entertainment** including social, tourism and industry events **over \$50**, hosted by someone likely to be or has potential to be a business associate.

*Provide only gifts, benefits or hospitality relevant to organisational purpose and deemed reasonable by others.*



#### When offered or received:

**These must be declared** using the Gifts, Benefits, Hospitality Disclosure Form and recorded on the gift register.

The CEO will inform you on whether the gift, benefit or hospitality can be accepted or must be declined/returned.

**CONTROLLED DOCUMENT HUB**



**Gifts, Benefits and Hospitality Procedure**

## SUPPLIER ENGAGEMENT

A supplier is considered **any third-party vendor**, consultant, contractor, service provider or supplier of goods.

We hold our suppliers to the **same standards of integrity** to which we hold ourselves.

When selecting suppliers we base our decisions on **merit, quality of service, and reputation** by:

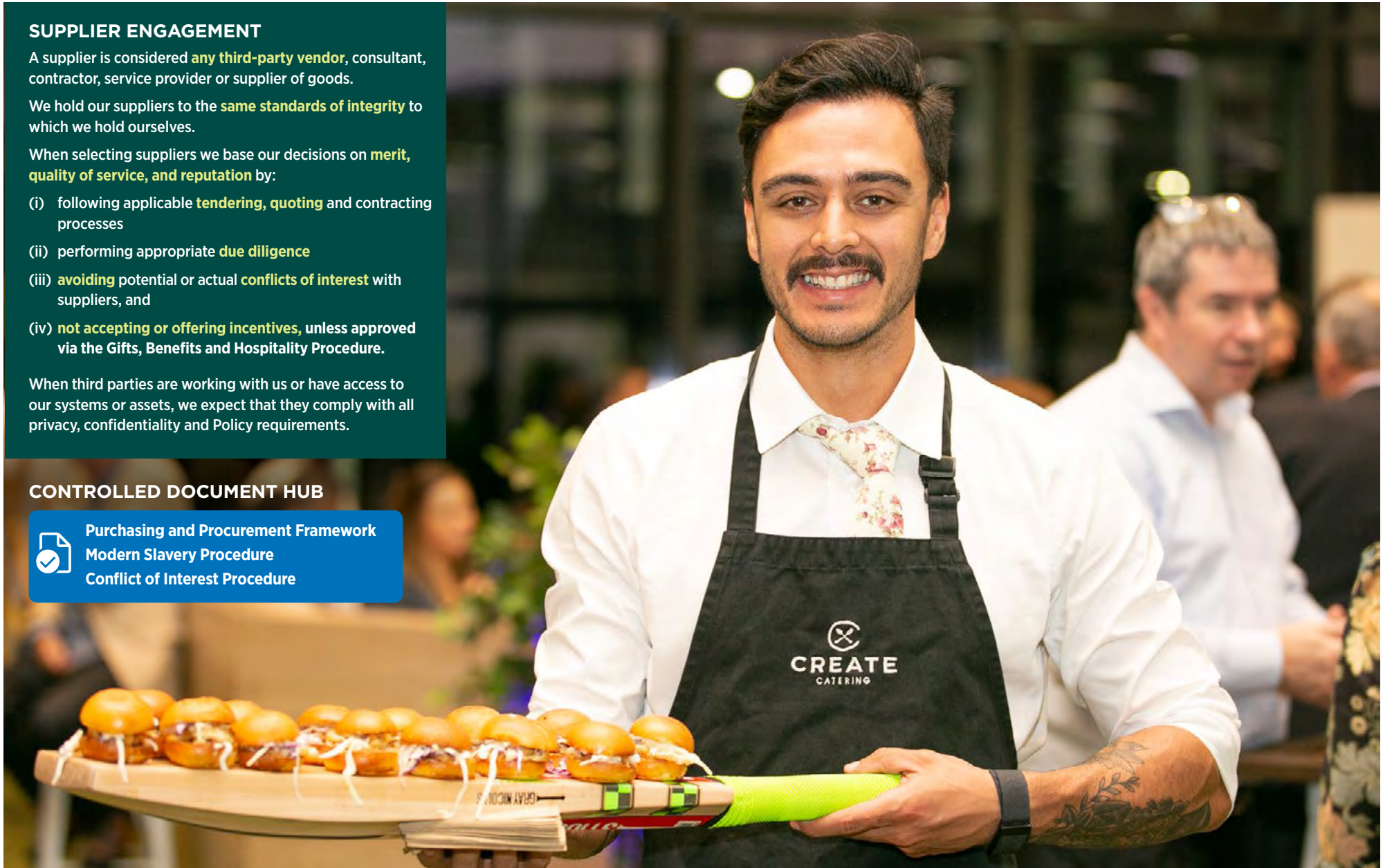
- (i) following applicable **tendering, quoting** and contracting processes
- (ii) performing appropriate **due diligence**
- (iii) **avoiding** potential or actual **conflicts of interest** with suppliers, and
- (iv) **not accepting or offering incentives**, unless approved via the Gifts, Benefits and Hospitality Procedure.

When third parties are working with us or have access to our systems or assets, we expect that they comply with all privacy, confidentiality and Policy requirements.

## CONTROLLED DOCUMENT HUB



Purchasing and Procurement Framework  
Modern Slavery Procedure  
Conflict of Interest Procedure



## We recognise and celebrate the value and diversity our relationships bring.

As a passionate conservation and ecotourism organisation, **we recognise the importance of building strong, positive, and long-lasting relationships** with our local community and stakeholders, visitors, partners and suppliers, as well as Traditional Owners and the broader Aboriginal and Torres Strait Islander community.

We acknowledge our role in **educating and empowering stakeholders to discover and care for Milawul's natural wonders**. We value the funding, support and collaboration of many other like-minded organisations and community members. Many of our achievements are shared and would not have been possible without the hard work and input from others. We are responsible for building on these relationships by being a trusted, responsive and inclusive partner.

*We engage with our community in many ways including through the Reconciliation Advisory Committee, Community and Environment Advisory Committee, Community Open Day, volunteer programs, newsletters and community campaigns.*



### COMMUNITY

We value the care and support that our community provides and seek opportunities for meaningful collaboration.

### VISITORS

We value visitors for their meaningful impact on our conservation goals and appreciate the diverse experiences they share.

### PARTNERS AND SUPPLIERS

We achieve more with the partners and networks around us. The expertise, skills, experience and funds they bring have been critical in each of our major achievements.

### ABORIGINAL AND TORRES STRAIT ISLANDER COMMUNITY

We recognise and deeply value the enduring connection to and care of Country by Aboriginal and Torres Strait Islander peoples.

### VOLUNTEERS

We acknowledge the care, dedication, and profound impact of volunteers.

### Penguin Foundation

Since its establishment in 2006 the Penguin Foundation has raised over AUD \$3.4 million.

# BREACHES OR CONCERNS

## Regarding our Code

We are committed to providing a workplace **where employees know they can speak up, raise concerns, and ask questions.**

### HOW IS OUR CODE BREACHED?

Breaches to our Code occur when **actions or behaviours are not reflective of our values, are not grounded in ethics and/or do not meet the expectations of our Code.**

**Not all breaches are equal; however, they will be treated seriously** and may result in disciplinary action. This may range from additional training and coaching to employment consequences, including termination of employment or in serious cases, referral to authorities.

Anyone working for or on behalf of the Nature Parks is required to adhere to our Code, policies, procedures, and the law.

If you require further guidance or have questions about how to interpret our Code, reach out to your leader or the People and Culture department.

<p><b>INTENTIONAL BREACH</b></p> <p>to benefit the Nature Parks</p> <p><b>Example</b> You knowingly climb a roof without the appropriate training and PPE to prevent the need for a contractor.</p>	<p><b>INTENTIONAL BREACH</b></p> <p>to benefit you</p> <p><b>Example</b> You sign in to work before arriving on site.</p>	<p><b>UNINTENTIONAL BREACH</b></p> <p>to benefit the Nature Parks</p> <p><b>Example</b> You portray the Nature Parks as a registered charity rather than a government agency to secure better product pricing or gain support from a third party.</p>	<p><b>UNINTENTIONAL BREACH</b></p> <p>to benefit you</p> <p><b>Example</b> You accept concert tickets from a supplier without seeking approval from the CEO.</p>
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### HOW DO I KNOW IF MY DECISION ALIGNS WITH THE CODE?

The Code consolidates key policies for a holistic overview but **doesn't replace the need to understand policies in their entirety.**

Exceptions to our Code are rare but may arise in exceptional circumstances, necessitating written approval from the CEO. Such exemptions cannot be presumed and must be explicitly granted by the CEO or the Board of Management.

The Nature Parks may vary, replace or revoke this Code. This Code is not intended to impose legally binding obligations on the Nature Parks, and is not incorporated into terms and conditions of employment or engagement. You will be advised of revisions to this Code as they arise and the date from which these changes will take effect. In the event of any dispute under this Code, the decision of the Nature Parks will be final and binding.

IS IT LEGAL?	DOES IT FIT OUR VALUES?
IS IT SAFE?	WHAT WOULD MY FAMILY THINK?
WHAT IS MY FIRST/GUT REACTION?	
WHAT WOULD THE NEWS HEADLINE BE?	AM I WILLING TO BE HELD ACCOUNTABLE?
SHOULD I ASK FOR ASSISTANCE TO MAKE THIS DECISION?	

**QUESTION:**

Is it safe to speak up?

**ANSWER:**

Absolutely.

**The Nature Parks is committed to ensuring that no retaliation occurs when an employee raises concerns about another person’s behaviour.**

Reporting potential breaches of our Code, policies, or the law, asking compliance questions, seeking advice on business practices, decisions, or actions, or cooperating in investigations will never result in reprisal.

**A NOTE ON BEHAVIOURS OUTSIDE HOURS OF WORK**

We live and work within the community, so it’s important to remember that you are required to conduct your personal affairs in a manner that does not affect your official duties. Avoid activities or behaviours, including online activities, outside of working hours which may harm the integrity or standards of the Nature Parks.

**HOW CAN I REPORT BREACHES OR CONCERNS?**

Not all breaches are equal. The following table guides you to determine how to report breaches or concerns:

Breach/Concern	Initial Point of Contact	Reference Policy/ Procedure
<b>Unlawful conduct</b> (including discrimination, harassment, bullying and victimisation)	If you feel safe to do so, call out the behaviour, inform your leader or lodge a formal complaint to the People and Culture department via <a href="mailto:employeerelations@penguins.org.au">employeerelations@penguins.org.au</a>	<ul style="list-style-type: none"> <li>Respect at Work Procedure</li> <li>Grievance Handling Procedure</li> <li>Diversity and Inclusion Policy</li> </ul>
<b>Drugs and alcohol</b>	Inform your leader or the Attraction Manager.	<ul style="list-style-type: none"> <li>Drugs and Alcohol Procedure</li> </ul>
<b>Attire and presentation</b>	Speak with your leader.	<ul style="list-style-type: none"> <li>Uniform and Presentation Standard</li> </ul>
<b>Privacy</b>	Speak with your leader.	<ul style="list-style-type: none"> <li>Privacy Procedure</li> </ul>
<b>Animal welfare, sustainability or cultural heritage</b>	Inform your leader or the ranger on call ( <b>emergency contacts list</b> ).	<ul style="list-style-type: none"> <li>Animal Welfare Policy</li> <li>Engagement Strategy</li> <li>Injured Wildlife Protocols</li> </ul>
<b>Child safety and wellbeing</b>	Inform the Attraction Manager and Child Safety Advisor immediately. Where required, call emergency services.	<ul style="list-style-type: none"> <li>Child Safety and Wellbeing Procedure</li> </ul>
<b>Serious risk to health and safety</b>	Inform the Attraction Manager and Chief Warden immediately. Where required, call emergency services.	<ul style="list-style-type: none"> <li>Occupational Health and Safety Policy</li> </ul>
<b>Workplace violence</b>		
<b>Health and safety (non-urgent)</b>	Rectify the issue where possible or log a <b>maintenance request</b> and submit a <b>hazard report</b> .	<ul style="list-style-type: none"> <li>Occupational Health and Safety Policy</li> <li>Injury Management and Return to Work Procedure</li> </ul>
<b>Improper use of resources</b>	Call out the behaviour and inform your leader.	<ul style="list-style-type: none"> <li>ICT Management Policy</li> <li>Motor Vehicle Terms and Conditions of Use</li> </ul>
<b>Cybersecurity</b>	Call out the behaviour, inform your leader or call urgent IT requests ( <b>emergency contacts list</b> ).	<ul style="list-style-type: none"> <li>ICT Management Policy</li> <li>Records Management Procedure</li> <li>ICT Security Procedure</li> <li>Employee Generated Content (ECG)</li> </ul>
<b>Social media/media</b>	Contact the Marketing and Communications department.	<ul style="list-style-type: none"> <li>Social Media Procedure</li> </ul>
<b>Conflict of interest</b>	Inform your leader or contact the People and Culture department.	<ul style="list-style-type: none"> <li>Conflict of Interest Procedure</li> </ul>
<b>Fraud and corruption</b>	Inform your leader, or if not appropriate, report to the CEO, CFO, Protected Disclosures Officer, or Anti-Corruption Commission.	<ul style="list-style-type: none"> <li>Fraud, Corruption and Control Procedure</li> <li>Public Interest Disclosure Procedure</li> </ul>
<b>Gifts, benefits, and hospitality</b>	Seek guidance from your leader. If further information is required, contact the Executive Assistant, CFO or CEO.	<ul style="list-style-type: none"> <li>Gifts, Benefits and Hospitality Procedure</li> </ul>
<b>Unethical supply chains</b> <b>Modern slavery</b> <b>Supplier misconduct</b>	Contact the employee managing the supplier or if unknown, the Contract and Procurement Officer.	<ul style="list-style-type: none"> <li>Purchasing and Procurement Framework</li> <li>Modern Slavery Procedure</li> </ul>

## WHAT HAPPENS IF I BREACH OUR CODE?

Should you become aware that you have, or suspect you have, breached our Code you should **promptly advise your leader or the People and Culture department.**

Individuals identified as having breached our Code will **be treated fairly in line with our Fair Treatment Procedure.**

### CONTROLLED DOCUMENT HUB

 Fair Treatment Procedure  
Grievance Handling Procedure

**Our Code applies to all employees, volunteers, trainees, board members, agents and contractors** of the Nature Parks and anyone else informed by the Nature Parks that the Code applies to them. You are required to act in accordance with the Code at all times during the course of your employment or engagement with the Nature Parks.

### KEY CONTACTS

Controlled Documents Hub - The Burrow

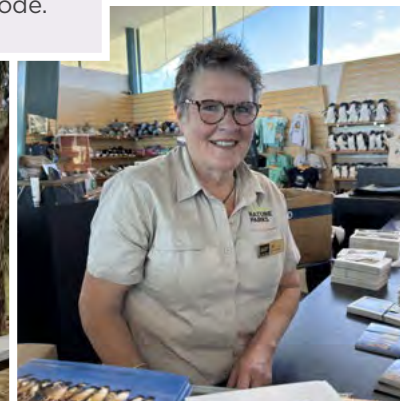
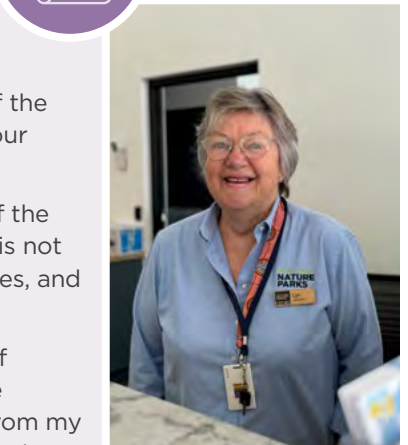
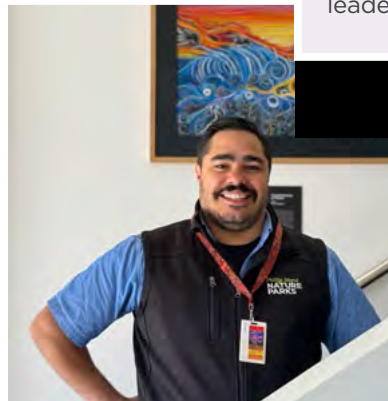
Emergency Contacts List - The Burrow

People and Culture department -  
[peopleandculture@penguins.org.au](mailto:peopleandculture@penguins.org.au)  
[employeerelations@penguins.org.au](mailto:employeerelations@penguins.org.au)

The Nature Parks Public Disclosure Officers

Independent Broad-based Anti-Corruption Commission (IBAC)

Health and Safety Representatives



## Acknowledgement and Acceptance of our Code



As someone who works for or on behalf of the Nature Parks, I will always act in line with our Code, values, policies and procedures.

I recognise that our Code is an overview of the Nature Parks policies and procedures and is not all-encompassing of the policies, procedures, and expectations I must adhere to.

If a situation arises that I am unsure of, or if I become aware of myself or someone else breaching our Code, I will seek guidance from my leader or other avenues identified in our Code.

Little Wonders  
PENGUIN  
PARADE



The Nobbies  
THE NOBBIES  
BOARDWALKS



Time Unwinds  
CHURCHILL  
ISLAND



Seal Cruise  
SEAL  
ROCKS



Urban Living  
ST KILDA  
PENGUINS



Bushland Escape  
KOALA CONSERVATION  
RESERVE



Phillip Island  
**NATURE  
PARKS**



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