



CODE OF CONDUCT

ORGANISATION:	Kokoda Track Foundation
ACN:	103 660 948
POLICY TITLE:	Code of Conduct
VERSION:	10.0
STATUS:	Final
ALLIED POLICIES / PROCEDURES:	Child Protection Policy & Code of Conduct PSEAH Policy Gender Equality Policy Disability & Inclusion Policy Human Rights Policy Discrimination, Harassment & Bullying Human Resources Manual Complaints & Grievances Handling Working with Communities Policy Conflict of Interest Policy Privacy & Security Policy Alcohol, Drugs & Betel Nut Policy
OWNER:	CEO
APPROVED BY:	Board
LAST UPDATE:	23.04.2025
NEXT REVIEW DATE:	23.04.2026

INTRODUCTION & SCOPE:

Kokoda Track Foundation's (KTF) Code of Conduct (Code) sets out our behavioural expectations for our people. All personnel, partners and representatives should always maintain the highest standards of integrity and conduct. Our Code is underpinned by the Organisation's core values, strategy, policies, procedures and guidelines. Our Code is not specific to any role or program; it applies to all people and personnel associated with KTF and underpins all activities, partnerships and programs across the entire organisation.

CORE VALUES:

KTF's core values are:

1. **Integrity:** The resources at our disposal are not our own. We ensure that we act with the utmost integrity in all scenarios, in our development work in Papua New Guinea, and in our fundraising, marketing and administration in Australia.
2. **Perseverance:** We understand and respect the challenging environment of working in development in Papua New Guinea. Our commitment is to enhance the lives and futures of our closest neighbours. With patience, perseverance, and creativity, we strive to fulfill this promise to the best of our ability.
3. **Compassion:** We work alongside communities, seek a thorough understanding of their needs, and respond with programs and projects in partnership with people. We do this with empathy and compassion.
4. **Ingenuity:** Whether it is our development work in PNG, or our administration and fundraising activities in Australia, we always strive to be as resourceful and transparent as possible. We overcome hurdles and work towards solutions with optimism and ingenuity.
5. **"Mateship":** Our mission was born out of the strong bond, often referred to as *Mateship*, forged between Australia and Papua New Guinea during WWII. The people of Papua New Guinea are our nearest neighbours and our friends. Our supporters entrust us to honour this friendship in the same spirit of the mateship that was at work during the Kokoda Campaign.

UNDERLYING COMMITMENTS & PRINCIPLES:

Human Rights

KTF respects, protects and promotes human rights for all, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, sex, gender, gender identity, sexuality, sexual orientation, poverty, class, or socio-economic status. KTF and all its personnel and representatives support and respect the human rights as set out in the Universal Declaration of Human Rights and the United Nations Sustainable Development Goals and agree that human rights are for everyone.

Ethical Approach

KTF conducts its operations honestly and honourably and expect our people, partners and stakeholders to do the same. Our approach to work in both PNG and Australia, and the methods imparted through our training, take proper account of ethical considerations, together with the protection and enhancement of the moral position of our partners and stakeholders.

Duty of Care

KTF's approach will always conform to relevant local laws and we believe that all organisations, including ours, should avoid causing any adverse effect on the human rights of people in the organisations we deal with, the local and wider environments, and the wellbeing of society at large. KTF has a Duty of Care in place for all personnel and partners and provides a workplace free from unlawful discrimination and harassment. KTF always strives to be fair and objective in our approach and actions and we are never influenced in our decisions, actions or recommendations by issues of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, sex, gender, gender identity, sexuality, sexual orientation, poverty, class, or socio-economic status. Everyone at KTF has an equal employment opportunity to work in a safe environment.

Professional Conduct

KTF conducts all activities professionally and with integrity. We take great care to be objective in our judgement and any recommendations that we give, so that issues are never influenced by anything other than the best and proper interests of our beneficiaries, stakeholders and communities we serve. KTF is committed to maintaining the highest degree of integrity in all our dealings with potential, current and past partners, donors and stakeholders, both in terms of normal commercial confidentiality, and the protection of all personal information received in the course of delivering KTF's current commitments.

KTF retains the ownership of all intellectual property that either employees or volunteers create unless agreed otherwise in advance with our partners, employees, volunteers and stakeholders. In return we respect the moral and intellectual copyright vested in our partners and stakeholder's intellectual property.

ACFID

KTF is a signatory to the Australian Council for International Development (ACFID) Code of Conduct (hereinafter ACFID Code), and as such, all KTF personnel including employees, board members and representatives are required to comply with the ACFID Code requirements. KTF's Code of Conduct is in alignment with the ACFID Code.

CODE OF CONDUCT

It is the responsibility of all KTF personnel and partners, including board directors, employees, contractors, partners and volunteers to review, understand and adhere to the Code of Conduct. KTF is committed to Code standards outlined below, with a key focus on the safeguarding of children, prevention of sexual exploitation, abuse and harassment of adults, ethical conduct, respectful relationships, protecting our reputation, responsible stewardship of resources and avoidance of risk.

1. All children are safe, protected from exploitation and abuse, and treated respectfully at all times.

I will adhere to KTF's Child Protection Policy & Code of Conduct (see allied document) endeavouring at all times to:

- keep children safe by implementing child-safe practices, care for and protect the rights of children, provide an inclusive and welcoming environment, and operate from 'do no harm' /zero-tolerance principles;
- prevent, oppose and combat all forms of child harm, including exploitation, abuse and neglect. I will immediately speak up if I observe or suspect any reportable conduct or concerns of exploitation, abuse or neglect; and
- treat all children fairly, with respect and dignity, regardless of race, religion, ethnicity, indigeneity, disability, age, displacement, caste, sex, gender, gender identity, sexuality, sexual orientation, poverty, class, or socio-economic status. I will encourage open communication between children, adults, parents, carers, staff and will actively support children to participate in the decisions that affect them.

See KTF's allied Child Protection Policy & Child Protection Code of Conduct for more information.

2. All people are protected from exploitation and abuse and treated respectfully at all times.

I will adhere to KTF's Prevention of Sexual Exploitation, Abuse & Harassment, Gender Equality, Disability & Social Inclusion, and Discrimination, Harassment & Bullying Policies (see allied documents) endeavouring at all times to:

- prevent, oppose and combat all exploitation and abuse of people, especially vulnerable people. I will immediately speak up if I observe any reportable conduct or concerns of exploitation, abuse or harassment; and
- respect all people's rights, including children's rights, and I will contribute to a working environment characterised by mutual respect, integrity, dignity, and non-discrimination.

I will ensure that my relationships and behaviour are not exploitative, abusive, or corrupt in any way, and I will not engage in any form of abuse or exploitation of any persons of any age.

I will not have sexual relations with Children (defined as under 18 years old), or with program beneficiaries (in exchange for assistance or any other reason), or with vulnerable and marginalised people, recognising the inherent unequal power dynamics involved, and that such behaviours can undermine the integrity and credibility of KTF's work.

I will also not exchange money, offers of employment, employment, goods or services for sex or sexual favours, engage in fraternisation, or any other forms of humiliating, degrading or exploitative behaviour, understanding that these standards exist to challenge sexually exploitative and abusive behaviour.

I will not participate in any abusive behaviours (including physical, sexual, and emotional abuse) towards vulnerable people including women and girls and people with disabilities.

See KTF's allied Prevention of Sexual Exploitation, Abuse & Harassment, Gender Equality, Disability & Social Inclusion, and Discrimination, Harassment & Bullying Policies for more information.

3. All people are included and their diversity valued, respected and supported.

I will act with care and respect at all times especially in the inclusion and treatment of other people including partners, beneficiaries and colleagues. I will treat everyone with dignity and courtesy and without discrimination, harassment or bullying.

I will actively promote pathways for participation for vulnerable and marginalised people including women and girls, people with disabilities, and people from disadvantaged backgrounds; and I will promote diversity wherever possible.

I will behave in a way at all times that doesn't create any unnecessary risk to the safety, health and wellbeing of myself and others including partners, beneficiaries and colleagues.

See KTF's allied Gender Equality, Disability & Social Inclusion, Risk Management, Safety & Security, and Working with Communities Policies for more information.

4. We work lawfully, with honesty and integrity across all we do.

I will behave honestly and with integrity in the course of working with or engagement with KTF.

I will adhere to all local laws and regulations. Where local laws and regulations are weaker than this Code, Our Code will take precedence.

I will comply with any lawful and reasonable direction given by someone in KTF who has the authority to give direction.

I will disclose, and take reasonable steps to avoid, any conflict of interest (real or apparent) in connection with working with or partnering with KTF.

I will behave in a way that upholds KTF values and the integrity and good reputation of KTF.

See KTF's allied Conflict of Interest and Working with Communities Policies for more information.

5. We are committed to efficient and respectful use of resources.

I will use KTF resources in a proper, efficient and respectful manner, ensuring minimal wastage. I will protect, manage, and use KTF's human, financial and material (including property) resources appropriately.

I will safeguard and make responsible use of the information and resources to which I have access by reason of my relationship with KTF.

I will act against any form of fraud or corruption and not offer, promise, give or accept any bribes.

I will disclose to my manager, or decline any gifts, that may be perceived to impact integrity or KTF's reputation.

See KTF's allied Fraud & Corruption Prevention, Counter Terrorism Financing & Anti-Money Laundering and Value for Money Policies for more information.

6. We are committed to transparent and ethical behaviour.

I will exercise due care in all matters of KTF business and will not share any confidential information about a beneficiary or other work-related matters.

I will not provide false or misleading information in response to a request for information that is made for official purposes in connection with my engagement with KTF.

I will not make improper use of:

- Inside information, or
- My duties, status, power or authority, in order to gain, or seek to gain, a benefit or advantage myself or for any other person.

I will comply with all relevant KTF policies and procedures.

I will ensure that Intellectual Property is not distributed without the consent of KTF.

See KTF's allied Privacy & Security, Intellectual Property Policies and Policy Manual for more information.

7. We uphold and support the good reputation of KTF

At all times, I will behave in a way that upholds the good reputation of KTF and act in accordance with this Code of Conduct.

Whilst observing the requirements of the Code, I will also be sensitive to, and respectful of, local customs and culture. In circumstances of conflict between the Code and culture I will, if necessary, seek support and advice from KTF leadership team.

I understand that social media is a valuable means for communicating and staying in touch with family and friends. I will take care not to blur the boundary between what I am saying as an individual and that of an Employee or Person connected with KTF. I will never speak on behalf of KTF without approval and in accordance with the Communications & Media Policy.

I will report any breaches of the Code of Conduct to my manager or the CEO of KTF (or board of directors in the case of the CEO undertaking the breach).

See KTF's allied Communications & Media and Working with Communities Policies for more information.

8. We are committed to the effective design, implementation and monitoring of programs to ensure that we bring about positive change for communities.

I will analyse and understand the context in which we work and the KTF strategy for achieving effective outcomes.

I will commit to the quality assessment of our work and reflect on, share and apply results in strengthening program delivery and sharing lessons with key stakeholders.

See KTF's allied Effectiveness Framework and annually published Effectiveness Results.

NON-COMPLIANCE WITH THE CODE:

Not complying or breaching Our Code or any KTF Policy and/or Procedure constitutes grounds for disciplinary action and could lead to dismissal from employment, partnership or service and result in legal proceedings. A breach of Our Code will be regarded as misconduct and may result in suspension of or reduced duties while actions are being investigated. Breaches of Our Code that are substantiated and regarded as gross misconduct will result in dismissal.

DECLARATION:

I confirm that I have read and understood the Kokoda Track Foundation's Code of Conduct. I have had the opportunity to ask questions in relation to the understanding and application of the Code of Conduct.

I agree to comply with the Code of Conduct.

I understand that it is my responsibility, as a person engaged by KTF to use common sense and avoid actions or behaviours that are in breach of this Code and all KTF policies including but not limited to the Child Protection; Gender Equality; Disability & Social Inclusion; Discrimination, Harassment & Bullying; Prevention of Sexual Exploitation, Abuse & Harassment; Human Rights; Working with Communities; Alcohol, Drugs & Betel Nut; Privacy & Security; and Counter Terrorism Financing & Anti-Money Laundering Policies, or could be construed as such.

I authorise KTF to undertake any necessary inquiries, including criminal record checks and reference checks as part of my appointment, recruitment or engagement process. Finally, I confirm my willingness to participate in relevant training sessions provided by KTF in alignment with KTF's Code of Conduct.

Name:

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Role:

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Sign:

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Date:

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