

Appendix V

TNC's Ethics & Compliance Process

In this Appendix:

[Get contact information for the TNC Ethics and Compliance office](#)

[Know how to file a complaint](#)

[Understand what happens after a complaint is filed](#)

Contacts for TNCs Ethics and Compliance Office

Helpline Web Portal:

nature.org/tnchelpline

Helpline:

Phone: (800) 461-9330 (US)

Text: 571-458-1739 (US)

See Helpline webpage for international numbers

Mailing Address:

4245 N. Fairfax Drive

Suite 100

Arlington, VA 22203

TNC's Ethics & Compliance Process is established to receive and resolve concerns related to TNC's alleged or perceived violations of:

- TNC's Code of Conduct;
- TNC's Policies and Procedures, including the Principles and Safeguards in this Guide;
- UN Declaration on the Rights of Indigenous Peoples;
- Conservation Initiative on Human Rights' Guiding Principles; or
- An IPLC Consent Agreement.

TNC staff should be reminded that each employee is individually accountable for compliance with TNC's Code of Conduct and Policies and Procedures.

Anti-Retaliation

TNC prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who in good faith raise suspected violations of law, cooperate in inquiries or investigations, or identify violations of TNC's Code of Conduct. Any employee who engages in retaliation will be subject to disciplinary action, up to and including termination.

Who May File a Complaint

Any community, organization or individual can file a complaint as an affected party. An individual or entity who has been authorized by an affected party may file a complaint on behalf of the affected party as a representative. Complaints may be filed anonymously and will be treated confidentially to the extent possible and disclosed to those with a need to know.

Filing a Complaint

An affected party or representative can use the TNC Helpline to file a complaint in their preferred language. The affected party or representative will be asked for the following types of information that the Ethics & Compliance Office will use to properly investigate a concern:

- Name and contact information
- The specific project or program of concern, including region, country and TNC local contact
- The approximate or actual date of the behavior that is causing a concern
- The alleged or perceived violation and the harm that is or may be resulting from the violation
- Any other relevant information or documents, if available
- Any actions taken so far to resolve the problem, including contact with TNC at the project or Business Unit level
- Whether confidentiality is requested

TNC's Ethics & Compliance Process

1. The Ethics & Compliance Office receives a grievance and determines eligibility.
2. The Ethics & Compliance Office will acknowledge receipt of the concern within 48 hours.
3. Within four business days of receipt, the Ethics & Compliance Office will assess eligibility and respond to the affected party or representative about whether or not the complaint raises an eligible grievance. It may be that the complaint should be addressed by another part of the organization or third party. In those situations, TNC will refer the complaint to the appropriate person and notify the affected party or representative.
4. If the grievance is eligible, the Chief Ethics & Compliance Officer will notify TNC's project team and Business Unit manager to the extent possible without breaching confidentiality, and also inform the affected party or representative and commence an investigation according to TNC's investigation procedures and specific considerations for working with IPLCs.
5. The Ethics & Compliance Office will also notify the Global Diversity, Equity & Inclusion Office, the Risk Officer, the appropriate TNC legal counsel and other senior leaders as appropriate.
6. Following the investigation, the Ethics & Compliance Office will develop draft findings, a proposed approach to resolution and an action plan and timeframe and present these to the affected party or representative, TNC's project team and Business Unit manager. Each party will have five business days to respond to the Ethics & Compliance Office's proposal.
7. Within five business days of the receipt of the responses or the due date for responses, the Ethics & Compliance Office may revise the draft proposal and then will issue a decision to the affected party or representative, TNC's project team and business unit manager. TNC's project team, Business Unit manager and the affected party are expected to implement the action plan in the decision.

8. The Ethics & Compliance Office will monitor implementation of the action plan and check in regularly with the affected party or representative as specified in the action plan.