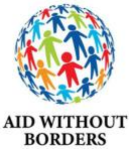




Code of Conduct Policy



Policy ID	POL-HR-COC	Version	1
Drafted by	AWB Legal Department	Approved by Board on	8/07/2025
Responsible person	Legal Department	Scheduled review date	7/07/2027

Revision Number	Revision Date	Summary of Changes	Changes Marked?

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1. INTRODUCTION

- (a) The AWB Code of Conduct helps AWB'S volunteers, employees and contractors to understand and adhere to the standards and policies of AWB.
- (b) The AWB Code of Conduct, implemented in 2025, reflects the values of fundamental human rights, social justice, the dignity and worth of the human person, respect for equal rights between women and men, competence, integrity, impartiality and discretion. It also highlights AWB's commitment to anti-fraud and anti-corruption, protection from sexual exploitation and abuse of the people we serve, and mutual respect.
- (c) The Board should review this Code of Conduct in 3-year intervals or as deemed appropriate.

2. WHO IS COVERED

- (a) This Code of Conduct applies to
 - i. AWB and all its employees, contractors and volunteers operating overseas and in Australia; and
 - ii. AWB partners and all their employees, contractors and volunteers operating overseas and in Australia.

3. Purpose

- (a) AWB's capacity to ensure the protection of and assistance to refugees, IDPs and other persons of concern (hereafter "persons of concern") depends on the ability of its staff to uphold and promote the highest standards of ethical and professional conduct.
- (b) Further, it is recognised that AWB work often puts its staff in positions of power over persons of concern.
- (c) This Code of Conduct sets the necessary standards of conduct.

4. Making A Complaint

- a) A complaint can be made in writing or by phone.
- b) The following table explains who a complaint should be brought to:

Person making complaint	Who should they report to
Employee or volunteer with AWB	<p>Their immediate supervisor, or if their complaint relates or involves their immediate supervisor, to the Human Resources Manager or CEO of AWB.</p> <p>If the complaint relates to or involves the CEO of AWB, the complaint should be reported to the Chair of the Board.</p>
Employee or volunteer with another organisation that partners with AWB	<p>To the complaints handling officer within the partner organisation and AWB's CEO.</p> <p>If the complaint relates to or involves the CEO of AWB, the complaint should be reported to the Chair of the Board.</p>
A member of the public	<p>To the CEO of AWB.</p> <p>If the complaint relates to or involves the CEO of AWB, the complaint should be reported to the Chair of the Board.</p>

5. Confidentiality

- (a) The person receiving the complaint should clarify whether the complainant wants to remain confidential.
- (b) Maintaining confidentiality can be difficult to carry out an effective investigation.
- (c) AWB can undertake to maintain confidentiality to the extent allowed by Australian law.

6. Procedure When Receiving Complaint

- (a) If a supervisor or HR Manager receives a complaint under this Code of Conduct, the supervisor must forward the complaint to the CEO or, if the complaint relates to the CEO, to the Board.
- (b) The CEO (or the Board where the Board has received the Complaint) must appoint an investigator. The investigator must be reasonably perceived with AWB as a neutral person capable of objectively considering the evidence.

7. Procedure When Concerns Are Raised But No Complaint Is Made

- (a) Where staff become aware of a possible breach of the Code of Conduct but no complaint is made, they must still act.
- (b) Where a CEO or member of the Board becomes aware of a possible breach, they must make reasonable enquiries to determine if an investigation should be initiated.
- (c) Where a staff member or volunteer (not the CEO or Board member) becomes aware of a possible breach, they must refer the matter to the CEO or the Board Member to consider under subclause 7(b).

8. Procedure for Investigation

- (a) The CEO (or the Board where the Board has received the Complaint) must appoint an investigator.
- (b) The investigator must be reasonably perceived with AWB as a neutral person capable of objectively considering the evidence.
- (c) The investigator should follow the steps outlined below:
 - i. make sure that the employee feels listened to and supported (you don't have to agree with what they say, but you must make sure that they know you will act on their concerns);
 - ii. if more than one person is present, establish the role of each person;
 - iii. explain that they cannot be adversely affected because they have made a complaint, and explain who to report matters to internally if they do feel that they are being adversely affected;
 - iv. listen to the complainant. Obtain a chronology of events (who, what, why, when, how etc.);
 - v. run through the applicable policies and procedures (e.g., the organisation's anti-discrimination policy) with the complainant;
 - vi. ask the complainant what kind of outcome they are hoping for and then talk them through the next steps;
 - vii. provide the complainant with plenty of time to ask questions;
 - viii. offer the complainant assistance (such as counselling through an Employee Assistance Program) or a way to get home safely if they are visibly upset;
 - ix. provide the complainant with a direct contact number that they can call

if they have any concerns or queries;

- x. take accurate and detailed notes of all conversations (including dates and people involved) and attach any supporting documentation; and
- xi. if deemed necessary, provide the employee/volunteer with a written summary of the meeting and clarify the next steps.
- xii. Following the interview with the complainant, the investigator should prepare a confidential report for the CEO, or if the findings implicate the CEO, to the Board.
- xiii. The investigator's report should include:
 - 1. an overview of the complaint
 - 2. a chronology of relevant events
 - 3. the applicable principles from AWB policies and relevant law
 - 4. conclusions and recommendations for AWB

(d) The CEO reserves absolute discretion regarding making a final decision on how the complaint will be resolved following AWB's policies and Australian law. If the complaint refers to or involves the CEO, the Board reserves absolute discretion as to making a final decision on how the complaint will be resolved per AWB's policies and Australian law.

9. Procedural Fairness

(a) Procedural fairness and transparency are critical in a workplace investigation. Maintaining procedural fairness means that you can:

- i. protect the interests of the participants in the investigation;
- ii. enhance the credibility of the investigation process;
- iii. rely on the investigation (and your findings) when making employment decisions; and
- iv. defend your employment decisions in a court or tribunal.

(b) Following are some pointers to ensure that a workplace investigation is procedurally fair. The investigator should ensure that:

- i. the person who is the subject of the complaint (the respondent) is aware of all the allegations made against them in sufficient detail;
- ii. the respondent is allowed a reasonable opportunity, including adequate time, to respond to each of the allegations;
- iii. the investigation is carried out in a reasonable time frame;

- iv. all participants are given the opportunity to have a support person in the interviews pertaining to the investigation;
- v. all participants are required to maintain confidentiality and sign a confidentiality agreement;
- vi. the investigator has no personal interest or bias in the matter being investigated;
- vii. all participants are given the opportunity to respond to any contradictory evidence; and
- viii. the investigator makes reasonable and diligent inquiries to ensure that there is sufficient evidence before making findings on the balance of probabilities.

10. Responsibilities To Educate Volunteers, Staff, and the Public About The Commitments in this Code of Conduct And How To Report

- (a) AWB and its partners will share a copy of this policy with all employees and staff annually, and during induction.
- (b) AWB will publicise its Code of Conduct and way to make a complaint on its website.

11. AWB Code of Conduct

I commit to

- (a) uphold the highest standards of accountability, efficiency, competence, integrity, and transparency in providing goods and services in the execution of their job;
- (b) observe local laws and international laws;
- (c) perform official duties and conduct private affairs to avoid conflicts of interest, preserving and enhancing public confidence in AWB;
- (d) ensure actions will be free of any consideration of personal gain and resist undue political pressure in decision-making;
- (e) neither seek nor accept instructions regarding the performance from any authority external to AWB;
- (f) treat all work colleagues, program beneficiaries and other persons fairly, with respect, courtesy, and dignity and according to the respective country law, international law and local customs;
- (g) never commit any act or form of harassment that could result in physical, sexual or psychological harm or suffering to individuals, especially women

and minors;

- (h) never exploit the vulnerability of any colleague or beneficiary group, especially women and minors, or allow any person/s to be put into compromising situations;
- (i) never engage in sexual exploitation nor abuse of any person, colleague or beneficiary group (men, women and minors). This constitutes acts of gross misconduct and is, therefore, grounds for termination of employment;
- (j) never exchange money, employment, goods, or services. All forms of humiliating, degrading or exploitative behaviour are prohibited;
- (k) in the humanitarian context, never abuse their position to withhold assistance nor give preferential treatment to solicit sexual favours, gifts, payments or personal gains of any kind. I will not accept gifts (except for small tokens of appreciation) or bribes;
- (l) report any breach of those regulations and rules or terms of the contract on the understanding that I have a right to be protected from retaliation;
- (m) In my relations with other staff, contribute to building a harmonious workplace based on mutual respect and understanding, respect for diversity, and freedom from harassment or abuse of authority;
- (n) respect their rights, dignity and safety of the communities we work in, consider their expressed needs and concerns, and act impartially and fairly;
- (o) abide by the AWB Risk Management Policy and Financial Controls and Delegations Policy and report any practice or attempted practice contrary or reasonably suspected of being contrary, as per the policy;
- (p) undertake not to use for unauthorized purposes any confidential information to which I have access during my association with AWB or to disclose any such information to unauthorized persons;
- (q) Be accountable and answerable for all my actions, decisions, and commitments made in performing my functions;
- (r) use the assets, property, information and other AWB resources with care, efficiency, effectiveness and integrity and for authorised purposes only, and accept that I am responsible for safeguarding the resources of AWB under my control; and
- (s) respect and promote fundamental human rights without discrimination, irrespective of social status, race, ethnicity, colour, religion, gender, age, marital status, national origin, political affiliation or disability.

12. SIGNING

The signatory below has read, understood and agrees with the content of this document, the Code of Conduct, which shall be subject to periodic revision and review. The signatory also accepts the consequences of violating any of the above provisions under this Code of Conduct.

Signatory	Authorised Witness
Name:	Witness Name:
Position:	Signature:
Signature:	
Phone:	
Address:	
Date:	Date: