

Code of Conduct

This document will replace the existing Blue Ventures Code of Conduct

June 2023 Review Date: June 2026

Introduction

This Code of Conduct contains essential principles and rules that reflect the behaviours and standards Blue Ventures expects from its colleagues, trustees, volunteers, interns, trainees, contractors, consultants, partners, and other representatives working for or on behalf of the organisation in any capacity or visiting our programmes or offices. These behaviours underpin our mission for thriving fishers and oceans and ensure we create a safe, compassionate, positive working culture for our colleagues.

Colleagues and other representatives working for or on behalf of Blue Ventures in any capacity frequently work in situations where they are in positions of power and where they are granted high levels of trust (in relation to the communities we serve, other organisations and one another). This power and trust must never be abused. Everyone in the organisation is obligated and responsible for maintaining the highest professional and ethical standards in their day-to-day conduct.

The Code of Conduct applies 24 hours a day, seven days a week and 365 days a year. It sets out an ethical and behavioural framework which is as relevant and applicable to our personal lives as it is to our work. For this reason, all colleagues and other representatives working for or on behalf of Blue Ventures in any capacity are required to sign a declaration when their engagement starts with BV (at the end of this document) confirming that they have read and understood the Code of Conduct and agree to comply with it at all times.

Blue Ventures has zero tolerance for behaviour that conflicts with its core values and Code of Conduct. Any breach of the Code of Conduct will be treated extremely seriously under the relevant BV policies, including disciplinary.

Overarching Principles

1. Our ability to achieve our aims, often in complex environments, is linked to how we behave and, particularly, the level of trust placed on us. The trust awarded to us relies heavily on all colleagues (and other representatives working for or on behalf of Blue Ventures in any capacity) upholding and promoting high standards of conduct and accepting their responsibility for safeguarding.
2. Blue Ventures' work is based on deeply held values and principles; these must be demonstrated by all colleagues and other representatives working for or on behalf of Blue Ventures in any capacity. If we fail to act consistently with our values and principles, we fail as an organisation.
3. We require all colleagues and representatives of BV to abide by the laws, customs and traditions of the countries they are working in.
4. All personnel, equipment and finances must be used appropriately and effectively for the means for which they are designated.
5. All colleagues and other representatives working for or on behalf of the organisation in any capacity should report any potential incident, abuse, or concern they have been made aware

of through the appropriate reporting systems and/or to a senior manager within Blue Ventures.

6. If you are a senior leader or manager, you have a particular responsibility to role model the expected standards and [leadership behavioural competencies](#), create a working environment that supports everyone upholding these standards, and appropriately deal with breaches of the Code of Conduct.

Code of Conduct

Ethical Conduct

7. You are expected to act in accordance with the values of Blue Ventures and to act with honesty, transparency, respect, and accountability in all your dealings with colleagues, partners, donors, and other stakeholders.
8. You will ensure that your conduct does not cause unnecessary risk, upset or harm and does not encourage or enable unacceptable behaviour on the part of others.
9. You comply with all Blue Ventures' policies
10. You strive for high standards in your work
11. You take responsibility for your actions.
12. You are conscious of and do not abuse your position of power as a representative of Blue Ventures.
13. You do not behave in a way that undermines your ability to do your job or will likely bring Blue Ventures into disrepute.
14. You do not drink alcohol or use any other substances in a way that affects your ability to carry out your role or jeopardises the reputation of Blue Ventures.

Compliance with Laws and Regulations

15. You comply with all applicable Blue Ventures policies and procedures.
16. You do not have, nor profit from the sale of, illegal goods or substances.
17. You do not have any connection to terrorist activity or Prohibited Parties.
18. You do not engage in any financial transaction (personally or with Blue Ventures' funds) or engage in activities which support a prohibited party (i.e. an organisation or person proscribed or designated on a government list which legally BV can not be associated with).
19. You do not use your own or Blue Ventures' funds or property for purposes of terrorism.
20. You do not release to others any private and confidential information relating to Blue Ventures (or for which we are responsible) unless legally required.

Environmental impact

21. You will comply with all applicable environmental laws, regulations, and standards in the regions where we operate.
22. You will promote the effective use of natural resources by Blue Ventures
23. You will minimise the environmental impact, including pollution when travelling, procuring and working with Blue Ventures and partners.

Conflict of Interest

24. You strive to avoid any situation leading to an actual or perceived conflict of interest. If you have any personal or financial interests that may affect your work or Blue Ventures' reputation, you disclose them promptly to your manager.
25. You do not enter into any business relationship on behalf of Blue Ventures with family, friends

or other personal/professional contacts for the supply of any goods or services to Blue Ventures or any employment-related matters without authorisation from the Country Director (or Regional Director in the case of the Country Director) or the Chief Finance Officer for UK colleagues.

Confidentiality

26. You maintain the confidentiality of sensitive information related to the organisation, its partners, and beneficiaries. You do not disclose or misuse any such information without proper authorisation.

Diversity, Equity and Inclusion

27. You respect the fundamental rights of all human beings, with a specific attention to marginalised and discriminated groups regardless of their gender, disability, ethnicity, sexual orientation, religion, language, medical status and other characteristics.
28. You work and act in respect of the diversity of cultures, religions, customs and beliefs of the communities we serve and work in and our partners. Discrimination of any kind will not be tolerated.
29. You show due respect, particularly through your conduct and language, for the religious beliefs, usages and customs, rules, practices and habits of the people of the country or context you are in and of your place of work. BV will provide travellers with briefing information on this area.
30. You treat others equitably and with respect in your private and professional lives.
31. You abstain from any conduct you know or should know to be inappropriate, particularly concerning your context.
32. You do not participate in any form of discrimination, harassment, bullying, humiliating behaviour or abuse (physical, sexual, emotional and verbal), intimidation or exploitation, or in any other way infringe the rights of others.
33. You actively contribute to creating a safe working environment free from harassment, including sexual harassment, bullying and intimidation, for all employees and other representatives working for or on behalf of Blue Ventures in any capacity.
34. Be mindful of the space that we occupy as individuals and ensure that the space is representative and intersectional (e.g. Challenge organisers of events and conferences where there is no diversity of speakers and encourage them to do more.)
35. Respectfully challenge the status quo.
36. Support each other to raise issues without being blamed for causing conflict.
37. Sit with discomfort – recognise that not everyone will have the same worldview as you.

Use of Resources

38. You use Blue Ventures' resources, including time, funds, equipment and assets, responsibly and efficiently. You do not use them for personal gain or benefit.
39. You carefully manage Blue Ventures' financial and other resources, ensuring they are not misused and protected from theft, fraud and damage.
40. (Except salaries from employment), you, your immediate family and close friends (including spouses, partners and those who share the same property) do not receive a personal financial benefit from project expenditure or operations, e.g. additional income from the accommodation, supplying goods or services.

41. You do not accept bribes or gifts, except small tokens (no/low financial) of appreciation from governments, the people we serve, donors, suppliers or others, which have been offered because of your employment or another representational role with Blue Ventures.
42. You do not ask for or invite any personal payment, service or favour from others, especially from the communities served by Blue Ventures, in return for our help, support, goods or services.

Safeguarding

43. You will complete all mandatory safeguarding training.
44. You respect the right to personal privacy of the communities we serve.
45. You inform your colleagues about where you are and what you do when working with children and vulnerable adults.
46. You do not show favouritism, which includes giving personal gifts to the people we serve.
47. You do not exploit, abuse or harass, in any way, community members, partners or colleagues.
48. You do not trivialise child abuse or the exploitation and harassment of adults.
49. You do not engage in sexual relationships with members of the communities we work with unless you were initially a resident or have become a long-term legitimate resident of the community and your relationship has not arisen because of an abuse of power.
50. You do not engage in any form of transactional sex. Transactional sex refers to relationships where the giving and/or receiving gifts, money, employment opportunities or other services is used to gain sexual favours.
51. You do not engage in any form of prostituted sex.
52. You do not withhold information about any current criminal convictions, charges or civil proceedings, including any relating to children, vulnerable adults or the abuse of anyone we support, or which may be relevant to your ability to carry out your duties, either when you joined Blue Ventures or that arise during your time of employment with Blue Ventures or during the period in which you are representing Blue Ventures in any capacity.
53. You do not engage in sexual activity with anyone under 18, regardless of the age of consent or local custom.
54. You do not engage in harmful and traditional practices, including Female Genital Mutilation, Child Marriage and Enforced Marriage.
55. You do not use anyone under 18 as a domestic worker.
56. You will not take photographs, make films or audio recordings of children irrespective of the medium used. The only exception is where your work requires this and you have obtained express approval from Blue Ventures.
57. You ensure informed consent is given for any images taken and used in your work with Blue Ventures and adhere to [BV's Photography Guidelines](#).
58. You do not view, download, create or distribute inappropriate material, such as pornography, on Blue Ventures' computer/systems.
59. You do not physically, sexually or emotionally harm or threaten to harm a child, vulnerable adult or community member we serve.
60. You do not send private messages to children or anyone from a community we serve whom you have met through Blue Ventures work, for example, private messaging on social media channels, unless you are from the community and communicating with family members.
61. You do not interfere with any complainant or witnesses or hamper any investigation or enquiry carried out into a child safeguarding, colleague or other concerns from the communities we serve.
62. You do not supply alcohol or harmful substances to a child or vulnerable adults.
63. You do not do things of a personal nature for a child or anyone we support that they can do

themselves, such as bathing.

- 64. You do not place children or others we serve in unsafe situations.
- 65. You do not allow concerns, allegations or suspicions of abuse or poor practice to go unreported.

Health and Safety

- 66. You comply with Blue Ventures' health and safety policies and procedures.
- 67. You do not endanger the health and safety of any individual
- 68. You do highlight any areas of concern in relation to health and Safety and ensure they are dealt with appropriately or escalated.

Continuous Learning and Improvement

- 69. You continuously develop your skills and knowledge to enhance performance and contribute to Blue Ventures' mission.

Data protection

- 70. All Blue Ventures colleagues are required to handle personal data lawfully, securely, and in accordance with the UK GDPR, EU GDPR, and organisational policies.
- 71. Any actual or suspected data breach must be reported to the Data Protection Officer or HR **immediately**.
- 72. Where a colleague is found to have deliberately taken action causing a data protection breach, the Organisation may take disciplinary action consistent with its policies, which may include a formal warning, suspension, demotion, or termination of employment, and could also result in civil or criminal liability.

Reporting Misconduct

- 73. Blue Ventures recognises that to realise our ambitious goals for the communities we serve and our mission, we must effectively report and respond to any wrongdoing, including fraud, safeguarding violations and other misconduct. As such, all colleagues, partners and other representatives working for or on behalf of Blue Ventures in any capacity have a duty to raise any concerns (through the appropriate channels) they may have about the conduct of others or how we operate as an organisation.
- 74. If you are a senior leader or manager, you have a particular responsibility to role model the expected standards, [leadership behavioural competencies](#), create a working environment that supports everyone upholding these standards, and deal with breaches of the Code of Conduct extremely seriously.
- 75. All colleagues must not conceal any information relating to incidents or behaviour that contravenes this code of conduct.
- 76. If you have any questions about applying the above principles to practical situations, or you may breach the code of conduct, please contact the Head of People Services.
- 77. We want Blue Ventures to be an open, self-critical and transparent organisation, and we have created a reporting procedure and Safeguarding and Reporting Committee to support our code of conduct.
- 78. If you have a concern about any person or program associated with Blue Ventures, please share it. You can do so by selecting one of the options available in the [WhistleB. reporting mechanism](#). The reporting service is designed to protect the communities we work with, our staff, and partners as well as our reputation. **It can be used by anyone** in contact with Blue

Ventures to alert us about any form of wrongdoing (for example, criminal offences such as fraud, misappropriations, discrimination, sexual harassment, exploitation, abuse and child abuse etc.) affecting people, our organisation, society or the environment.

79. The Safeguarding Committee acts in the interest of all Stakeholders. It will take all reports seriously and ensure that your concern is carefully considered and that you hear back within three working days. When an investigation is recommended, the investigation will conclude with a report to the Board of Trustees and you. If you are dissatisfied with the response, you should raise the matter with an appropriate organisation or body, e.g. the Police, UK Charity Commission or appropriate Government agency in your country of work.
80. For Blue Ventures colleagues, we encourage you to report any wrongdoing. We will take all reports seriously and commit to investigating all reports thoroughly. The UK Public Interest Disclosure Act 1998 protects employees from suffering a detriment or having their contract terminated for 'whistleblowing'. We will apply this protection to our colleagues wherever they work. However, suppose the procedure has not been invoked in good faith (e.g. for malicious reasons or in pursuit of a personal grudge), and the investigation concludes that the report was malicious or vexatious. In that case, you may be subject to disciplinary action.

CODE OF CONDUCT PERSONAL DECLARATION

I CONFIRM THAT I HAVE READ, UNDERSTOOD, AND SHALL ABIDE BY THE CODE OF CONDUCT PRINCIPLES FOR THE ENTIRE PERIOD I AM WORKING OR ASSOCIATED WITH AND OR REPRESENTING BLUE VENTURES. I UNDERSTAND THAT VIOLATION OF THE ABOVE PRINCIPLES AND ELEMENTS IN THE CODE OF CONDUCT CAN, DEPENDING ON THE DEGREE OF SEVERITY, RESULT IN IMMEDIATE DISCIPLINARY ACTION, WHICH CAN INCLUDE DISMISSAL.

I WILL RAISE THROUGH APPROPRIATE CHANNELS ANY MATTER WHICH APPEARS TO BREACH THE STANDARDS CONTAINED WITHIN THIS CODE OF CONDUCT

Signed

Name in block letters

Job Title

Date