

Purpose

WWF International has a principle of zero tolerance to fraud and corruption. As an organization that condemns and fights fraud and corruption as one of the key drivers of poverty, environmental degradation and bad governance, it requires its own staff and all contracted parties to respect this principle at all times by fully conforming to all contractual terms, procedures and/or policies adopted to prevent fraud and corruption.

WWF is committed to handle promptly and firmly all allegations of fraudulent or corrupt activities, including investigating thoroughly where necessary, irrespective of whether these activities are attributed to WWF staff or to the contracted party. In certain cases, the actions of the contracted parties may cause WWF, its directors, officers and employees to be liable for these actions. Additionally, these allegations may lead to sanctions (including disciplinary actions up to and including summary dismissal, dismissal of officers, and termination of contract), and legal actions (including civil actions and criminal prosecution).

This Policy is intended to explain the standards of conduct that WWF expects from its contracted parties with respect to the prevention of fraud and corruption, and conflicts of interest, and to give guidance to its contracted parties on how to report any conduct that is prohibited under this Policy.

Scope

This Fraud & Corruption Prevention and Investigation Policy ("Policy") applies to all contracted parties (including their officers, employees, advisors, agents and consultants) who enter into an agreement with WWF-International or any of the WWF offices, and who shall comply with the provisions of this Policy at all times.

In this Policy: "Contracted party" means any third party with whom WWF enters into an agreement, and includes (without limitation) grantees, implementing agencies, third party service providers (such as relocation agencies, customs brokers, etc.), consultants, agents, intermediaries, representatives, officials, contractors, suppliers, consultants, brokers, distributors, vendors, partners, lobbyists and activists, and other third parties contracted by, acting for, or providing services to WWF. "WWF-International" means WWF – World Wide Fund for Nature (formerly World Wildlife Fund), a Swiss foundation. "WWF offices" mean the field offices of WWF (e.g. Programme Offices and other offices reporting into WWF or the Programme Offices). "WWF" means WWF-International and WWF offices collectively.

Conduct Prohibited by this Policy

Fraud i.e. the act of deceit against the organisation in order to obtain a personal or collective advantage, avoid an obligation or cause a loss.

Corruption i.e. the act of dishonestly obtaining an advantage from a third party by abusing an entrusted power for private gain.

Bribery i.e. the offering, promising, giving, authorizing or accepting of any undue pecuniary or other advantage to, by or for a public officer or for anyone else in order to obtain or retain a business or other improper advantage.

Fraud and corruption are not restricted to monetary or material benefit, but could also include intangible benefits.

Examples of fraud and corruption:

- bribery, deception, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, and collusion.
- theft or misuse of assets, proprietary data or intellectual property;
- deception (e.g. misrepresentation of qualifications to obtain employment);
- knowingly misrepresenting the costs, or financial status (e.g., through false financial statements) of an office, a project, an activity, etc., e.g., through falsified documents;

- providing favours or money to judges or other public officials to pursue personal or WWF goals;
- providing contracts to third parties for the provider's personal benefit;
- fraudulent expense reports;
- misstatements of any accounts to any manager or to WWF's auditors;
- paying a kickback (where the bribe is paid out of the contract proceeds themselves);
- conflict of interest that results in financial harm to WWF.

Gifts

All contracted parties should not accept or offer gifts, hospitality or benefits of any kind that might be seen to compromise their integrity or to be benefiting the person offering the service or the recipient personally and/or at the cost of WWF's reputation. However, small gifts with no material value may be received or offered in appropriate situations provided there is no appearance of corruption, fraud or conflict of interest.

Conflict of Interest

All contracted parties shall not have any unauthorised conflict of interest with WWF or in the context of their performance of their agreement with WWF. Conflicts of interest can arise if a contracted party (including immediate family) has a close professional, financial, personal or other interest with a WWF employee or officer, or which is competing with the best interest of WWF. Should any such conflict arise, all contracted parties shall immediately disclose it in writing to the relevant WWF party. Failure to do so will constitute a breach of their agreement(s) with WWF and will entitle WWF to terminate their agreement with immediate effect, without prejudice to and in addition to any remedies or other rights provided by law and/or statute and/or under any other provision of their agreement for the benefit of WWF.

Contracted parties' responsibilities

When working with or on behalf of WWF, contracted parties must have, and be seen to have, high standards of integrity.

Each contracted party has a duty to ensure that the funds provided/granted by WWF are safeguarded and used for the purposes intended by WWF, and to report immediately if they suspect any fraud has been committed or they see any suspicious acts or events (see investigation section below). Contracted parties should assist in any related investigation by making available all relevant information and by co-operating with investigators (e.g., interviews, provision of documentation, etc)

Contracted parties shall ensure that appropriate measures are in place within their organization to effectively prevent, deter, detect and communicate potential fraud, corruption and conflict of interest.

In particular, under no circumstances should any payments or anything of value be made, promised or offered to any government employee in violation of this Policy and in contravention of applicable laws in the relevant country. Furthermore, no assistance, payments or anything of value (monetary or non-monetary) should be made, promised, offered to, or accepted from any government employee or official to:

- influence any official government act or decision;
- induce any government employee or official to do or omit to do any act in violation of his/her lawful duty;
- obtain or retain business for, or direct business to any individual or entity.

Even if it is locally common practice to provide bribes, or if the contracted party receives the assurance that the payment is permitted under local laws, any requests to provide an advantage, cash payment, gift or entertainment, or any other behaviour covered by this Policy should be:

- refused, explaining that contracted parties are prohibited by this Policy and the law from providing the advantage requested; and
- reported as described in this Policy.

Warning Signs

It may not be always easy to detect corrupt or fraudulent behaviour. Contracted parties should take extra care where there are warning signs of fraud or corruption in the contracted party's organization. This list is not intended to be exhaustive but it is indicative of these warning signs:

- abnormal cash payments, or lavish gifts being received;
- an individual who never takes time off, or holidays, or insists on dealing with specific contractors himself or herself;
- unauthorized signature of consultant contracts during management's absence;
- missing documents or records regarding payments, expenses, meetings or decisions.

Reporting

WWF strongly encourages all contracted parties to report concerns regarding or potential violations of this Policy.

■ When to raise a concern

It is not required to have absolute proof of the misconduct to file a report because it may not always be clear whether the conduct in question can be considered as being fraudulent or corrupt. This is why all actual or suspected violations can be reported under this Policy. Reports made in good faith will not be subject to any disciplinary or similar actions even if no wrongdoing is found after investigation. WWF encourages that individuals identify themselves as this may facilitate the investigation. However, reports provided anonymously will also be investigated as necessary. Anonymous reports will be handled with extra care to protect individuals against abusive or false reports.

■ How to share a concern

Contracted parties should immediately report their concerns to a WWF Director. If the contracted party feels that the issue has not been dealt with appropriately or is unable to report the allegation through this channel then the following persons can be contacted.

- Director General, WWF International
- Chief Operating Officer, WWF International
- Head, Compliance, WWF International

Alternatively, contracted parties can report through the **Whistle Blowing Centre, WhistleB** which is operated by an independent third party company, and available 24 hours a day, seven days a week. The reports are taken in full confidentiality and are handled in accordance with this Policy. Reports can be lodged at <https://report.whistleb.com/en/wwf>. More than 10 languages are available and follow up and updates on your cases will be received.

Investigation of Fraud or Corruption

The Senior Management of WWF-International, in coordination with the Audit Committee, is responsible to ensure that all reports submitted according to this Policy are appropriately addressed. All reports made according to this Policy will be passed to the appropriate members of the senior management who will take prompt and appropriate measures based on the nature, scope and seriousness of the allegations. These measures may include initiating an investigation and supervising the conduct of such investigation, and if necessary, consulting with other persons such as the Internal Auditor, the General Counsel, as well internal and external advisors (such as legal or tax experts, accountants, etc.).

The Audit Committee, which is independent of the management of WWF-International and reports to the Board of WWF-International, will be informed of all reports of allegations and of WWF International's measures to investigate them.

Confidentiality and Data Protection

Reports and the identity of the person who filed a report will be handled in confidentiality to the extent possible and in compliance with applicable laws. The reports and the investigation documents will be kept on a legitimate and need-to-know basis.

As part of the investigation and, if applicable, the measures and procedures undertaken subsequently, the following information may be processed: details on the misconduct (e.g. description of the facts and circumstances), personal data on the person making the report (unless the report has been made anonymously) and on the individuals named in the report (e.g. name, contact details, professional details, etc.). Personal information reported under this Policy will be handled in compliance with applicable data protection laws. Where required by local law, individuals will be informed that they have been accused of wrongdoing, and have a right to access and correct their personal data by contacting WWF.

Compliance with this Policy

Compliance with this Policy is important to WWF. WWF encourages contracted parties to report their concerns if they suspect or become aware of any conduct contrary to this Policy. Any violation of this Policy will be handled appropriately and may result in (i) immediate termination of the agreement with the contracted party; (ii) disciplinary actions (up to and including summary termination) against WWF employees; and (iii) immediate dismissal of directors. Additionally, WWF may initiate legal proceedings (e.g. civil action to recover any losses or other damages (including consequential damages), and criminal action). WWF may also be bound by law to report certain allegations, whether proven or not.