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CODE OF CONDUCT 2024

Wereld Natuur Fonds
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Be one with nature

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WHAT IS THE CODE OF CONDUCT?

What is the Code of Conduct and does it apply to me?

This Code of Conduct applies to all employees, (non)executive board members, volunteers, interns, etc. ("staff") at WWF-NL, as well as all people we hire to work for us (e.g. secondees, temporary workers or independent contractors). Compliance with this Code is a condition of employment and/or condition of the agreement entered into by the person or organization delivering services to WWF-NL.

How is this code related to our existing Code of Ethics?

This Code of Conduct guides us in how to 'live' WWF's ethical values on a daily basis.

- Be global, independent, multicultural and non-party political
- Use the best available scientific information to address issues and critically evaluate all its endeavours
- Seek dialogue and avoid unnecessary confrontation
- Build concrete conservation solutions through a combination of field based projects, policy initiatives, capacity building and education work
- Involve local communities and indigenous peoples in the planning and execution of its field programmes, respecting their cultural and economic needs
- Maximize our effectiveness by building partnerships with other organizations, governments, businesses and local communities
- Work in a responsible and transparent manner

Our world

Minimize our environmental impact, comply with environmental protection legislation, and encourage other to do the same.

Ourselves

These ethical principles guide our behaviour towards each other and society; the public; governments and organizations; the media and opinion influencers; our corporate partners; our suppliers and consultants; and our institution.

Our mission and core values

Our purpose, mission and core values form an integral part of this Code of Conduct. Our purpose is the reason for our existence. Our values guide us in how we treat each other. Together they are the DNA of our organization. Our core values have been translated into guidelines for how we behave towards each other and how we address each other.

Purpose

To create one world where nature and people thrive by activating millions.

Mission

Our mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature by preserving biodiversity worldwide, by ensuring sustainable use of natural resources and by promoting the reduction of pollution and wasteful consumption.

Core values

Courage: We demonstrate courage through our actions, we work for change where it's needed, and we inspire people and institutions to tackle the greatest threats to nature and the future of the planet, which is our home.

Integrity: We live the principles we call on others to meet. We act with integrity, accountability and transparency, and we rely on facts and science to guide us and to ensure we learn and evolve.

Respect: We honor the voices and knowledge of the people and communities that we serve, and we work to secure their rights to a sustainable future.

Collaboration: We deliver impact at the scale of the challenges we face through the power of collective action and innovation.

Does this code explain all the standards I need to know?

This Code is a general compilation of our existing policies and is intended as a user friendly overview. For details, we must refer to the relevant policies, which will gradually be updated. At a later stage, more specific rules may be introduced that will be included in this code. It is important for you to know and act according to the rules.

What about different laws and standards in different countries?

If the local law or the local WWF office requires higher standards than those in this Code, we apply these higher standards. Hosted staff or those travelling must also comply with the rules of the host office. Given the worldwide reach of WWF, cultural norms may also interact with our policies. In this case, always seek guidance and prior permission from your manager.

Do managers have special obligations?

Yes. Managers must ensure team members are aware of and understand this Code of Conduct. Leaders are expected to be spotless examples, doing the right thing when a concern is raised, and responding in an appropriate manner.

What do I do if I am not sure?

When in doubt, we always ask these questions before we act:

1. Is my prospected action legal, honest, ethical, and in line with WWF values and principles?
2. How might it affect WWF's reputation and Mission?
3. Is this the right thing to do? How would I feel if everybody around me, my family, my co-workers, our donors, knew about it?

If you notice something that is not in line with this Code, talk to the person concerned. For help, start with your Line Management, a Human Resources contact or a confidential advisor. In case of gross violations, please see Chapter 8 of this document.

Questions and requests for guidance are always welcome.

Please contact:

Annemiek Dijkhuis,
Manager HR a.i. (adijkhuis@wwf.nl)

Valerie Thomaes,
Compliance Coordinator (vthomaes@wwf.nl)

1. I RESPECT MY COLLEAGUES

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We are a WWF global community connected by our Mission. We foster a culture of professionalism and mutual support. We respect our colleagues and we embrace our cultural differences and turn it to our strength.

1.1 Respect for diversity, equal opportunity, equity and gender balance

WWF-NL is an equal opportunity employer. All employment decisions are based on merit, qualifications, and abilities. No job applicant or staff member will receive unfavourable treatment on the grounds of race, color, national or ethnic origin, religious or political affiliation, gender, marital status, sexual orientation, disability, class, age, or being affected by an illness.

WWF-NL actively pursues gender balance at all levels of the organization and ensures that policies, programmes and activities benefit women and men equally and contribute to gender equity. All staff, and in particular managers must respect diversity and will prevent discriminatory practices.

1.2 Prohibition of gross misconduct, harassment and anti-social behaviour

WWF is determined to maintain a working environment free from any anti-social behaviour, and will not tolerate the below conduct.

Harassment

Offensive, intimidating, demeaning, hurtful, malicious or threatening comments or conduct towards another person, demonstrated repeatedly. This includes bullying

Sexual harassment

Any physical, visual, verbal or non-verbal conduct or communication of a sexual nature that is not desired, not consensual, usual repeated, including (but not limited to):

- promise of rewards in exchange for sexual favours

- persistently offensive or humiliating comments, jokes and allusions
- sexual advances
- showing, sending, e-mailing or downloading unwelcome sexual (visual) materials
- comments on someone's sex life
- physical contact (e.g. kissing or touching)
- explicit or implicit threats

Sexual harassment does not include invited, consensual and reciprocal sexual interaction, flirting, attraction or friendship.

Violence

Incidents in which staff are physically attacked or threatened in the workplace. "Workplace" means not only the physical workplace in the office but also work-related locations outside the office such as meetings, conferences, fieldwork, etcetera.

1.3 Protection from retaliation

WWF-NL is committed to protect employees who share concerns of inappropriate activities from any form of retaliation.

Any staff member who engages in retaliation will be subject to discipline up to and including termination. If we make a report and subsequently believe we have been subjected to retaliation of any kind we should immediately report it via the channels noted in Chapter 8.

Related policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)](#)):

- WWF INT Code of Conduct
- WWF Standard Discrimination & Harassment Free WWF
- Statement of Principles: Gender Equality

2. I RESPECT SOCIETY AND ALL COMMUNITIES

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Our Mission commits us to build a future in which humans live in harmony with nature. As such we strongly believe that the success of our Mission lies in the well-being of society and all communities. We are strongly committed to ensure our work does not negatively impact communities in places where we have our activities.

2.1 Working in line with Statements of Principles

We respect human rights throughout our activities, whether in our field offices, campaigns, voluntary support, fundraising, or employment. This includes child protection against all forms of injury, abuse, neglect, maltreatment and exploitation; and fair treatment of workers and their protection against exploitation, physical punishment or involuntary servitude and respect all applicable labour laws.

We respect and contribute to gender diversity and balance in every stage of our work.

We engage with indigenous people in our work, to understand the drivers on the environment, and to work with them in addressing these.

2.2 Being open to concerns from communities

If we witness or receive a complaint of any harm done to communities or vulnerable groups or individuals in the implementation of our conservation work, please immediately report it to appropriate local senior management.

WWF also has a mechanism for outside groups to dialogue directly with WWF regarding potential breaches to the principles in this section. Please go to 'WWF Network Core Standard on Whistleblowing and Complaints Management (for reference see below).

Furthermore, a report can be made to WWF International via WhistleB:

<https://report.whistleb.com/en/wwf>

2.3 Working with Environmental and Social Safeguards Framework

To safeguard social and environmental principles, the Environmental and Social Safeguards Framework (ESSF) provides a comprehensive framework describing integrated work processes. It helps us ensure that we implement our obligations in practice and that we identify, understand and mitigate risks, related to potential impacts of our activities to people and nature, in a timely manner. ESSF is applied in the design, implementation and monitoring of 'place-based' activities or activities we fund or implement and that land in the field. This means that we work together with local partners and communities in the design phase of a project to map out the risks as much as possible. If necessary, we then include measures in the project approach to prevent and reduce these risks. This requires close cooperation with our project partners and the WWF network.

Related policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)](#)):

- WWF Network Standard Child Safeguarding and Protection of Rights;
- Statements of Principles: Human Rights, Gender Equality, Indigenous Peoples
- Environmental and Social Safeguards Framework (ESSF)
- WWF Network Core Standard on Whistleblowing and Complaints Management
- Complaints Resolution Process

3. I FOLLOW THE LAW

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We all need to respect the letter and spirit of the law. There are situations which are not only against our internal rules and policies, but can also be prohibited under applicable law. We must understand and comply with laws applicable to our area of responsibility (e.g. employment law, tax law, charity regulations).

3.1 Zero tolerance to fraud, corruption, bribery, collusion

Fraud

The intentional deception by anyone entrusted with WWF-NL resources, to personally gain from or harm WWF.

Corruption

Abusing entrusted powers inappropriately for private gain. This includes:

- Bribery: offering, giving, receiving, or soliciting something of value for the purpose of influencing the action of an official in the discharge of his or her public or legal duties;
- Facilitation payments: payments to secure or speed up routine administrative or government actions;
- Extortion, embezzlement, misappropriation, false representation, concealment of material facts to gain an unfair advantage, etc.;
- Collusion with others in any of the above to gain a collective advantage.

In certain cultures, providing entertainment, hospitality or gifts in the pursuance of business relations is customary and legal. Nonetheless these exchanges can be perceived as bribery.

We must ensure such exchanges are legal, non-material and not intended to influence business. In any case, we must take particular care when dealing with government officials. Please remember, transgression by even one staff member can damage the reputation of

WWF-NL (see also in Chapter 5.3: Accepting Entertainment, Hospitality or Gifts; and Chapter 6: Money and Finances”).

3.2 Data protection

WWF-NL is committed to respecting the privacy of personal information of its employees, donors or other individuals, whose data we hold. If we have access to such data, we follow the data security and privacy rules in place. Please remember, individuals' personal data is protected by law and any breach can lead to a legal action.

3.3 Preventing criminal activity in receiving and distributing funds

WWF respects government sanctions against criminal activities, including terrorism. Please ensure we conduct appropriate due diligence when providing funds to an organization or an individual, or selecting and paying suppliers.

It is also prohibited to knowingly accept donations which aids and abets tax evasion, money laundering, terrorism or other illegal activity. This is why highly restricted anonymous donations are not accepted.

Related policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)](#) and/or [Pandamet](#)

- WWF Core Standard on Prevention of Fraud, Bribery and Corruption
- WWF-INT info and personal data security policy
- WWF-NL Privacy Policy
- Due Diligence outgoing grants policy

4. I STAY SAFE AND ENSURE OTHER'S SAFETY

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We operate globally in remote areas because of the nature of our Mission. We ensure we are well informed on WWF's health, safety and security procedures, and take care to ensure our own safety and security at work as well as that of our colleagues and partners.

4.1 Health safety and security

WWF takes all measures necessary to ensure the health and safety of its employees and to manage risks. But you yourself play a major role in protecting your health and safety.

If you are going on a trip, make sure your vaccinations are still valid. Always read the official health and safety warnings when traveling to a risk area. We never use a blacklisted airline and adhere to local health, safety and security rules and procedures.

If you feel that your health or safety is at risk, you have the right to voice your concern and, if warranted, you may refuse an activity deemed dangerous without that refusal reflecting badly on your performance or incurring repercussion.

4.2 Law enforcement

If in our job, we interact with local law enforcement, or if we have questions regarding the presence of arms in our offices or in our programmatic work, please seek guidance from our senior management. If there is a specific policy for a region or country, please conform to that local policy.

4.3 Risk management and Quality Assurance

Quality Assurance is essential to achieve the desired impact. That is why we ensure that we take all appropriate and required steps in the design, implementation and monitoring of conservation projects and in our operational work.

It is important to ensure that risks are managed within WWF's risk appetite and in general that relevant risks - to WWF and

others - are properly identified and where necessary mitigated and monitored. These risks must be considered in relation to the reward - or impact - we seek and balance with it.

Related policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\) and/or Pandanet](#)

- WWF-NL Travel health and safety policy
- Security guide Expat Preventive
- WWF Network Risk Management and Quality Assurance Standard

5. I AM LOYAL TO WWF AND CONTRIBUTE TO ITS REPUTATION

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We are working for the most reputable conservation organization in the world. Each of us is a WWF ambassador and all our actions contribute to our reputation. We uphold WWF's interests at all times.

5.1 Avoid conflicts of interest

We must act in accordance with our legal duty of loyalty, which means acting in the best interests of WWF when performing our job. A conflict of interest arises when we have a personal, family, or business relationship, or any activity, interest, or association outside WWF that could impair our ability to act in the best interests of WWF, or that could give the appearance of interfering with our responsibilities on behalf of WWF.

We should avoid any situations of conflict of interest. If we find ourselves in a potential or actual conflict of interest, we must immediately disclose it in writing to our Manager and Human Resources. The situation will be reviewed and actions taken to ensure the conflict is not or cannot be abused.

5.2 Work and activities outside of WWF

Paid work outside of our job must always be disclosed to your Manager and be approved in advance by WWF-NL as set out in the relevant policy.

5.3 Accepting entertainment, hospitality or gifts

In many cultures, accepting entertainment, hospitality or gifts when doing business is customary and legal. Nonetheless, we ensure such exchanges are, and are meant to be, non-material and not intended to influence business transactions, or to be personally beneficial.

Do not accept entertainment or hospitality, and discuss with someone in case of doubt. All gifts received should be reported to HR (hr@wwf.nl) and be handed over to facilities. By the end of every year we will raffle off gifts among staff.

Discounts or commissions on a WWF purchase are for the benefit of WWF and not for staff. In any case, cash must never be given or received as a gift. See also in Chapter 3: Zero Tolerance to Fraud, Corruption, Bribery, Collusion.

5.4 Walk the talk

Given the environmental impacts and costs, we only travel when absolutely necessary, and use the most economical, environmental means including public transport when possible. We get permission and pay for personal travel adjoining a WWF trip. We offset our carbon emissions by purchasing Gold Standard carbon credits. We reduce our personal consumption of electricity, heating, paper and water. We trust that our staff act according to our principles and care about sustainability also in their personal lives.

5.5 Protecting our reputation

We take care in building partnerships. Please ensure WWF never accepts donations from, or engage with, individuals, groups or organizations which can seriously harm WWF's reputation, integrity, impartiality or ability to deliver its strategy or Mission. WWF has identified "exclusion" or "extreme caution" industry sectors (e.g. armament, tobacco, fossil fuels, nuclear power, etc.). We are each responsible to understand such restrictions prior to engaging with the corporate sector.

Relevant policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)](#) and/or [Pandonet](#)

- WWF Corporate Engagement Guidelines
- WWF-Int Carbon Emissions and Offset
- Expense Policy WWF-NL
- Terms and Conditions of Employment (TCE) WWF-NL
- Vliegbeleid WWF-NL

6. I AM A GOOD STEWARD OF WWF'S MONEY AND ASSETS

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We are committed to the proper and lawful use of WWF funds and assets. We are good financial stewards, respecting our donors' money in the pursuit of WWF Mission. We do not spend when we do not need to, and we always aim to get the best value for money. We safeguard WWF assets (physical assets, the WWF Brand and information).

6.1 Money and finances

Spending our funds carefully

Before we commit to any expenses and when we are travelling, we ask ourselves whether this is necessary, reasonably priced, relevant, compliant with the law, and permitted with the relevant donors. Please also see in Chapter 3: I Follow the Law.

Using our time efficiently

Time is a very valuable asset, for which donors pay as well. We are efficient with our working time and that of our colleagues, and respect related local office rules related to working hours, leave, etc. If we are tasked to report our working hours (for example to a particular activity) we do so fully, accurately and in accordance with donor requirements.

Procurement and due diligence

The purchasing or hiring process must be followed for all purchases of goods and services between EUR 10,000 and 100,000, including the hiring of freelancers, advisors and consultants. This means requesting a minimum of 3 quotes and viewing, comparing and checking prices against the market, reviewing quality, getting recommendations, testing providers' abilities to deliver services and their willingness to meet WWF standards. This ensures we obtain high quality and value for our donors' money.

Purchases above EUR 100,000 must be tendered by means of a Request For Information, Request For Proposal and specific, extensive selection criteria for which points are given and weighting factors are applied.

Detailed information can be found in the Purchasing & Hiring Policy 2022.

Ensuring our partners follow our standards

We expect our implementing partners and consultants who are entrusted with our funds to live up to WWF's ethical principles. If WWF pays a party for work on our behalf, we must ensure that they are using our funds lawfully, reasonably and ethically, and fully perform their obligations.

Powers of authority

We must ensure that we have the authority when committing WWF. We are responsible to know and respect the limits and procedures of our authority to sign contracts and other commitments on behalf of WWF. For example, we need two signatories for contracts above a certain monetary threshold. Functions who are authorized to enter into commitments on behalf of WWF will receive a power of attorney letter setting out the relevant level of authority.

Maintaining accurate books and records

We prepare and keep accurate, truthful, transparent, complete, timely and up-to-date information (including records, reports, and expense claims). We have a legal duty towards authorities (e.g. Tax authority, Goede Doelen Nederland, ANBI) to keep these records, for legal procedure, audit purposes, or upon request from authorities. We have a legal duty of 7 years to carefully safeguard these records and protect against loss, especially during a legal procedure.

6.2 Physical assets

Using WWF assets with care

We take good care of WWF assets (facilities, equipment, credit cards, etc.) and IT resources (phones, electronic devices and communication tools, including data stored or transmitted). We follow the instructions of use and ensure security of the assets. We protect them against loss, theft, or damage. Incidental personal use is permitted, if it does not conflict with the WWF interests,

it does not distract us from our work. If lost, damaged or stolen due to negligence, we may be required to compensate WWF. We apply fair use when using phone data and internet access to avoid extra costs.

6.3 Non-physical assets

Intellectual property rights

These include trademarks, copyright, designs, patents, know how, domain names, photos, website designs, likeness, industrial or commercial property, logos, videos, publications, processes, drawings, database, etc.

We are a science-based organization, producing research and literature. We have one of the world's most renowned brands. These are all valuable assets that we need to protect against unauthorized use or misuse. In addition to protecting our intellectual property, we must also do the same for others' intellectual property rights with which we are entrusted (for example, a partner's copyright, software, photos, publications). Similarly, we purchase and use properly licensed software.

Confidential information

This is information which is not public. This can be information about the organization, donor lists, development plans, know-how, research projects, financial information, dealings with authorities and governments, strategic plans, trade secrets, other non-public information we see during our jobs.

WWF may also be entrusted with our partners' (for example a corporation's) confidential information, for example related to their affairs, products, operations, business plans, strategies, clients, methods of manufacturing, sourcing and logistics. (See also Chapter 7.2: Confidentiality).

Proprietary information

This is information that we own and which is not public. This can include intellectual property (like trademarks, databases,

designs), confidential information (information which is not public, but can belong to others) and personal information (personnel records, salary information, donors database, etc.).

We must keep our own and others' confidential and proprietary information secure and avoid any disclosure to those who are not authorized to have access to it. We can only share it with those who have a legitimate, need-to-know basis for accessing this information, after we ensure they signed a confidentiality agreement. Sometimes this information is also covered by other laws (for example, data protection), in which case the disclosure can also be restricted under the law. Our obligation to keep the information secure continues even after we leave WWF.

Tip: Do not discuss this information in public places, like waiting for a flight. Do not discuss this information with family members. It is okay to refuse sharing information if we do not feel the recipient is allowed to have access to the information.

6.4 Information technology

We use all of WWF's data and information technology resources in a respectful and responsible manner. We comply with all cyber security measures and procedures implemented by WWF. This includes reporting any suspicious activity, protecting organizational information and resources from unauthorized use or disclosure, observing authorized levels of access, and utilizing only approved IT technology devices, software or services

Relevant policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)and/orPandamet](#)):

- Byelaws and Internal Regulation (Huishoudelijk Reglement)
- Clean desk policy WWF-INT
- WWF-NL Procurement policy
- WWF-NL Expense Policy
- WWF-NL Beveiligingsbeleid met BCP
- WWF-NL Use of AI

7. I BRING CREDIT TO WWF AND I COMMUNICATE WISELY

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When we speak, we represent WWF. We are careful when we act in the public arena, whether with partners, online or in intergovernmental fora and public events. We do not speak on behalf of WWF unless we are authorized and have been briefed before, especially when dealing with crises.

7.1 WWF Brand

WWF is one of the most known brands in the world. Our brand is about so much more than our panda logo – it’s our DNA. We safeguard our brand and follow the approach laid out in our brand book – One Network, One Vision, One Voice. We respect our WWF brand guidelines to bring a consistent and coherent approach to our visual and verbal identity.

7.2 Confidentiality

In the course of our partnerships, our public or private partners (e.g. our corporate partners) will entrust us with proprietary and confidential information. We must respect confidentiality of this information at all times. We should not disclose, publish or otherwise share this information unless specifically authorized to do so. (See also Chapter 6.3: Confidential Information).

7.3 Social media and public communications

WWF respects employees’ rights to personal opinions and affiliations. But when communicating publicly and through media as a WWF employee we are cautious when sharing personal opinions that could interfere with the work of colleagues. We remember that we create perceptions about WWF to an external, broad audience. Therefore, we:

- Only give our views of our area of expertise,
- Make and post meaningful and respectful comments
- Are polite when disagreeing with others’ opinions, and admit any errors
- Use our real name and disclose that we work for WWF

- Do not use WWF in any social media identity (e.g. username, “handle” or screen name)
- Do not publish proprietary information or breach confidentiality
- Do not denigrate other organizations, companies, individuals or WWF
- And do not knowingly provide false or inaccurate information

7.4 Media inquiries and crisis management

At times, there might be negative media or publicity including potentially damaging attacks on our reputation or brand which require an appropriate response. We do not respond, and instead seek guidance from appropriate communications or senior managers. If we have agreed to communicate, we only use the agreed messaging, and communicate transparently, honestly, accurately, and respecting brand guidelines.

7.5 Tolerance and respect at intergovernmental for a and public events

This means acting according to the rules conduct of the forum and associated activities; ensuring open and constructive dialogue between parties and observers; respecting the principles of national sovereignty and the primacy of governments in negotiations; treating any recognized symbols of all nation states with respect; and showing respect and tolerance for others’ culture and customs (e.g. political and religious convictions). We commit to relevant codes of conduct when required.

Relevant policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)and/orPandantet](#))

- WWF-INT Brand Guidelines
- WWF-NL Code of Conduct Internet, E-mail and Telephone usage
- WWF-NL Code of Conduct social media
- WWF-NL Crisis Communication Hand Book

8. I SEEK HELP WHEN IN DOUBT AND SPEAK UP TO RAISE MY CONCERNS

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We can help WWF to become the best-in-class by helping in the prevention of irregularities. To do this, we must get informed and understand the rules. If in doubt or when we see something that does not seem right, we reach out for help and guidance. We know we can speak in confidence because we are protected against retaliation when we raise our concerns in good faith.

8.1 Getting informed

We must carefully read WWF's policies, codes and other employment conditions that we receive at the beginning and during the course of our employment. If we have any questions, we ask them. WWF regularly provides training for staff, which we're expected to attend.

8.2 Asking the right questions

If we are in a "dilemma" situation, and we don't know what to do, we ask the right questions:

- Is my action legal? Honest? Ethical? In line with WWF values and principles?
- How might it affect WWF's reputation and Mission?
- Is this the right thing to do? How would I feel if everybody around me knew about it?

8.3 Raising concerns

WWF strongly encourages us to speak up if we witness, or have a concern about misconduct or illegal activities. But things are not always clear. This is why we are not expected to have an absolute proof about our concern. But we should have some basis for it, and report it in good faith.

We can first address the person concerned about his or her conduct. In case of sensitive situations or if your actions have no effect, contact your manager or HR – Business Partner (follow the procedure below).

If you do not wish to do so, or your actions have no effect, contact another senior manager or

the confidential advisor. You can then discuss whether action should be taken and if so, which action to take. One option is to file an internal report in accordance with the relevant policy. Under the House for Whistleblowers Act, WWF-NL has introduced the Policy on Reporting Misconducts. Misconducts (serious breaches of integrity with a social impact) and Irregularities (serious breaches of integrity that do not have a direct social impact).

Because WWF-NL is publicly funded, breaches are more likely to have a social impact. This makes it even more important to report misconducts or irregularities.

8.4 Can I report anonymously? Will I be protected from retaliation?

It is allowed to file anonymous reports. Please remember, the investigation can be facilitated if we identify ourselves as we can be contacted to give more information that can be needed during the investigation.

WWF protects us against retaliation (see Chapter 1), and the Policy on Reporting Misconducts also contains measures to protect people who file reports.

8.5 Who receives my report and how will it be handled?

All reports are handled confidentially by the manager, HR – Business Partner or CA (Confidential Advisor). In consultation with the reporter they decide which steps or actions should be taken. If the situation reported qualifies as a report under the Policy on Reporting Misconducts, the procedure described in that policy will be followed.

Overview of roles

Reporter

- Identifies or experiences unethical or unwelcome behaviour
- Addresses the person concerned, or, if preferred, contacts a manager or CA first

- Raises his/her concerns with a manager or CA to resolve the matter
- Enjoys protection if the report is made in good faith

Manager or HR – Business Partner

- Choice can be made if either the HR-Business Partner or manager is first point of contact for reporter, besides the CA
- Asks for confirmation of the concern in writing from the reporter
- Identifies, prevents and fights unethical and unwelcome behaviour
- Always contacts the Chief People Officer (in case of unwelcome behaviour and other breaches of integrity)

Confidential Advisor (CA)

- Is the point of contact if the reporter prefers not to contact a manager or HR – Business Partner (yet)
- Listens and advises
- Asks for confirmation of the behaviour in writing from the reporter
- Examines the steps that should be taken
- Refers to the Chief People Officer or other appropriate officer or external organization

CPO

- Advises managers on breaches of integrity
- Directs integrity screenings if necessary
- Collects all data on cases of (suspicion of) breaches of integrity
- Functions as a reporting point for employees who are unable or unwilling to report to them or a manager
- Has to follow up on any report made
- Discusses all cases related to integrity with the Executive Director

Executive Director

- Ensures (through management) an ethical and safe environment at the workplace
- Is responsible for compliance of integrity policy
- Initiates investigations into possible breaches
- Is responsible for taking (disciplinary)

measures

Chairman of the Supervisory Board

- Reporting point if a report concerns the Executive Director and in this case responsible for the reporting process instead of the Executive Director

The reports will be shared only to the extent strictly necessary for the investigation and the subsequent procedures, for example, with the General Counsel, Chief People Officer, Chief Finance Officer, and external advisors such as forensic investigators or lawyers.

8.6 International reporting

Reports can also be made to WWF International. Especially if it concerns an irregularity or abuse that affects the entire network. This can be about:

- 1. WWF Internal affairs
- 2. Impact on communities
- 3. Human rights

Reports can be made through WWF-International's reporting system, WhistleB: <https://report.whistleb.com/en/wwf>

Or with the following persons:

- WWF INT Director Human Resources
- WWF INT Head of Compliance

Relevant policies (which can be found via the site of OneWWF: [Network Standards and Policies \(google.com\)](#) and/or [Pandamet](#)

- WWF-NL Regulation Reporting Misconduct (Regeling Melding Misstanden)
- WWF Network Core Standard on Whistleblowing and Complaints Management
- WWF-NL Integrity Policy

Sanctions

In the event of a violation of the principles and obligations arising from the Code of Conduct and/or policies referred to in this Code, WWF-NL may impose sanctions.

The responsibility for imposing sanctions lies with the management team. The level of management where the decision is made depends on where and by whom in the organization the violation occurs.

The applicable sanction will depend on the circumstances of the specific case and may include, for example: a verbal or written warning (one, more or a final with an explanation of the consequences in case of repetition) all possible with a note in the personnel file; recovery of damages; a penalty (if applicable); suspension or dismissal (with or without immediate effect).

