

Prevention of Fraud, Bribery and Corruption

WWF Core Standard

Version 2.1 - December 2025

Owners: Senior Director Accountability, WWF International Global Director, Finance, WWF International

This Standard is subject to review on a regular basis and at least every 3 years.

VERSION HISTORY:

Version	Title	Released
V1.0	WWF Operational Network Standard: Prevention of Fraud and Corruption	February 2012
		Designated by WWF International Board as a Core Standard Sept 2020
V2.0	Network Core Standard on Prevention of Fraud, Bribery and Corruption	Endorsed by Network Executive Team May 2021 Approved by WWF International Board September 2021
V2.1	Core Standard on Prevention of Fraud, Bribery and Corruption Updates made to references, links and job titles. Minor rephrasing for consistency with other Core Standards.	December 2025

1. Purpose & Scope

Purpose

This WWF Core Standard ("Standard") sets out the principles and minimum expectations to prevent and address fraud, bribery, and corruption within all WWF Offices.

WWF is committed to the highest standards of integrity and accountability, and to creating an environment where ethical behaviour is expected, supported, and recognized. We have no tolerance for fraud, bribery, and corruption in any form and expect all Staff, Board members, volunteers and third parties working with us to act honestly, transparently, and in line with our values.

Beyond legal compliance, we are committed to living our values by actively preventing fraud, bribery, and corruption and responding decisively when concerns arise.

Scope

The Standard applies to all WWF Offices and all WWF Staff, subject to local laws. It is the responsibility of each WWF Office to adopt policies, procedures, and practices that reflect the commitments and minimum expectations in this Standard, comply with local legislation, and are appropriate to their operational context.

2. Core Requirements for All WWF Offices

Every WWF Office MUST, at a minimum:

2.1 Establish Clear Local Requirements

- Adopt and maintain a local policy and related procedures aligned with this Standard and local legislation, whichever sets a higher bar.
- The policy must define fraud, bribery, and corruption and clearly outline unacceptable behaviours.
- Ensure the policy addresses key risks, including facilitation payments, gifts and hospitality, political contributions, and working with public officials.
- Make clear that Staff must not:
 - Offer or accept anything of value in exchange for preferential treatment or business advantage.
 - Engage in conduct that would reasonably be seen as unethical or compromising WWF's integrity.

2.2 Build Awareness and Competence

- Provide induction on Fraud, Bribery and Corruption to all Staff, volunteers, and board members, who must acknowledge their understanding and commitment to the policy.
- Provide **training** to Staff and relevant volunteers, which must include the importance of acting with integrity, recognising red flags, and understanding how to raise concerns as a core part of WWF's culture.

 Make policies and reporting mechanisms accessible and well-communicated to all Staff and relevant Third Parties.

2.3 Implement Preventative and Responsive Measures (internally and with third parties)

- Maintain appropriate internal processes, controls and oversight and regularly review their effectiveness.
- Conduct **due diligence on third parties** including new Staff, partners, suppliers, grantees, and major donors to assess integrity risks and to prevent inadvertent financial dealings with sanctioned entities, and terrorist or criminal financing.
- Ensure **contractual partners commit** to preventing and reporting fraud, bribery, and corruption in their work with WWF.

2.4 Encourage a "Speak Up" environment, and Respond Fairly and Promptly to Concerns, in line with the Speak Up Core Standard and Safeguard on Grievance Mechanisms

(For the full requirements, refer to these Standards)...

- Ensure that Staff, volunteers, partners, stakeholders, and communities can **easily report concerns**, including through verbal reporting options where necessary.
- Offices must promptly inform WWF International of allegations that have the
 potential to impact the global brand via the secure <u>Global reporting system</u>. In
 addition, Offices can inform the WWF International Chief Operations Officer,
 Senior Director Accountability, or Director Workplace Investigations.
- Implement appropriate **actions and remedies** based on investigation findings.
- Ensure **recovery of losses**, where possible, and improve controls to prevent recurrence.

2.5 Address Conflicts of Interest

- Maintain a **Conflict of Interest** policy that defines conflicts, require.5s disclosure, and establishes procedures to manage them.
- Require all WWF Staff and Board Members to disclose conflicts as they arise.

2.6 Monitor and Continuously Improve

- Regularly review local policies and controls to ensure they remain fit for purpose.
- Monitor the implementation of this Standard and provide updates to the WWF Network as requested.
- **Share** good practices and lessons learned across the Network to support continuous improvement.

3. Responsibilities

WWF Office Leaders: Accountable for full compliance with this Standard. Must lead by example (set the "tone at the top") and ensure effective systems and controls are in place.

WWF Staff: Responsible for acting with integrity, preventing misconduct, reporting concerns, and supporting investigations.

WWF International will monitor compliance across the Network and may request information to support global oversight.

4. Guidance, Support and Other Relevant Standards

For questions on this Standard, WWF staff can contact their Legal Counsel, Head of Finance and Administration Department, or the owner of the Standard.

Network Standards related to this Standard:

WWF Core Standard on Speak Up

Examples of relevant office policies and guidelines (mandatory for the specified office(s) only):

- <u>WWF International Policy on Fraud & Corruption</u>: Prevention, Detection and Response Policy
- WWF International Conflict of Interest Disclosure and Management Policy
- <u>WWF International Incident Response</u>

Annex: Definitions

Fraud: wrongful or criminal deception intended to result in financial or personal gain.

Bribery: offering, giving, soliciting, or receiving anything of value as an inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. This can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

Corruption: the abuse of entrusted power or position for private gain, for example by (but not limited to) government officials.

Facilitation payments: small, unofficial payments made to expedite routine actions. Definitions may vary by local law.

Staff: all employees engaged by a WWF Office.

(Associated) Third-Parties: Individuals and entities that work with WWF, including grantees, consultants, vendors, suppliers, partners.

'Offices' include National Organisations and their affiliated offices, and WWF International and its reporting offices unless specified otherwise.