



Core
Standard

SPEAK UP!

Whistleblowing and Complaints Management

WWF Core Standard
Version 3.0, September 2025

Owner: Senior Director Accountability, WWF International

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

VERSION HISTORY:

| Version | Title | Released |
|----------------|---|--|
| | Whistleblowing Protocols (attached to Prevention and Investigation of Fraud & Corruption Network Standard) | 2012 |
| 1.0 | Speak Up! Network Standard on Whistleblowing and Escalation of Issues | August 2018 |
| 2.0 | Speak Up! Network Standard on Whistleblowing and Complaints | September 2020 Re-endorsed by WWF International Board and designated as a Core Standard |
| 3.0 | Title as version 2. Updates to references, links and job titles. Rephrasing for clarity and consistency with other Core Standards. References added to ESSF grievance mechanism and Ombudsoffice. Requirements specific to certain offices removed. | September 2025 |

1. Purpose and Scope

Purpose

This WWF Core Standard (“Standard”) sets out principles and minimum expectations for WWF Offices to **provide accessible, safe, and secure channels** for reporting concerns without fear of retaliation - related to illegal, unethical, harmful, or negligent conduct by WWF Staff, Board members, volunteers, or associated third parties - and to **respond to those concerns**. It also covers reports on the negative impacts of WWF or WWF-funded activities.

The Standard should be implemented consistently across the WWF Network to uphold accountability, transparency, and integrity in all WWF operations.

WWF aims to encourage a Speak Up culture where staff feel comfortable raising genuine concerns, even if they turn out to be mistaken. WWF is committed to protecting those who report concerns and any impacted parties from retaliation and further misconduct by WWF Staff or third parties. WWF seeks to extend protection wherever possible to witnesses and any other parties involved, including those accused of misconduct who all have a right to non-retaliation and a fair investigation.

Scope

The Standard applies to all WWF Offices and Staff, subject to local laws. WWF Offices may adapt the Standard to local contexts, ensuring alignment with the commitments and minimum expectations as set out in the Standard.

Examples of concerns that should be reported include, but are not limited to:

- Theft, fraud, or misappropriation of funds or assets;
- Corruption, such as bribery, kickbacks, or abuse of power;
- Serious misconduct, including discrimination, harassment (including sexual harassment), or verbal or physical assault
- Criminal activities, such as illegal labour practices, tax evasion, money laundering, or human trafficking, including by contracted partners or third parties;
- Breaches of our environmental and social safeguards;
- Unauthorised disclosure of confidential or personal data;
- Failure to uphold our Child Safeguarding standard;
- Non-compliance with legal or regulatory requirements;
- Behaviour that conflicts with WWF’s values; and
- Conduct that could damage WWF’s reputation or bring the organisation into disrepute.

This is not an exhaustive list; any serious concern should be raised.

2. Core Requirements for All WWF Offices

Every WWF Office **MUST**, at a minimum:

2.1 Establish Reporting Channels

- Provide one or more secure, confidential, and accessible reporting channels available in local languages.
- Offices may use the Global Reporting Channel wwfinternational.ethicspoint.com and/or their own channel. Other means for raising concerns may include dedicated emails, online systems, phone numbers, dedicated 'people of trust'.
- Reporting channels must comply with local and international data protection, whistleblowing, and other relevant regulations.
- Where the Environmental and Social Safeguards Framework (ESSF) applies (i.e. place-based activities), grievance mechanisms must integrate the requirements of the [ESSF safeguard on grievance mechanisms](#). This includes the option of filing an ESSF-related complaint with WWF's Office of the Ombudsperson for handling according to its independent process.
- Third-party channels: If an Office engages a third party to receive concerns (for example a community centre which takes in grievances from local communities, or an external whistleblowing channel provider), the Office must have a written agreement including procedures with the third party that ensure lawful, secure information transfer and compliance with this Standard.
- Concerns will also be received through other means (e.g., via media, email, word of mouth); these should be recorded and treated in the same manner as if they were raised into the dedicated reporting channels.

2.2 Build Awareness

- Provide induction on Speak Up to all Staff, volunteers, and board members, who must acknowledge their understanding and commitment to the policy.
- Ensure **Staff, associated third parties, and local communities** are informed of available reporting channels, grievance mechanisms (including the Office of the Ombudsperson), and response processes through, as appropriate, inductions, training, stakeholder engagement, community outreach, and contractual commitments.
- Develop Staff capabilities to **recognise, respond to, and report** concerns or allegations.

2.3 Protect Reporters and Affected Parties

- Provide appropriate duty of care, including confidentiality, data protection, and protection from retaliation, to any person impacted in a concern whether as a reporter, witness, victim, or a subject of concern.
- Prohibit retaliation or detrimental treatment against individuals reporting in good faith.
- Address any retaliation promptly, with disciplinary action if substantiated.

2.4 Establish Response Processes and Procedures

These should include but are not limited to the following:

- Mechanism to acknowledge receipt of concerns and provide regular updates to complainants.
- Impartial investigation of concerns, using trained personnel with no conflicts of interest and adhering to local employment law and regulations.
- Maintenance of **secure, confidential records** of all reported concerns, investigations, outcomes, and any corrective actions.
- Offices are fully accountable for addressing concerns relating to their operations.

2.5 Escalate when appropriate

- Offices should establish a protocol for escalation of serious concerns.
- Offices must promptly inform WWF International of allegations that have the **potential to impact the global brand** via the secure [Global reporting system](#). In addition, they can inform the WWF International Chief Operations Officer, Senior Director Accountability or Director Workplace Investigations.
- Information shared in escalating an issue should by default **NOT** include personal data, but should include the type of concern, date of the event (if known), proposed action to address the issue and an office contact person.
- A summary of how the matter was resolved is required at the relevant time. Personal data will only be included in this summary if necessary.

2.6 Communicate with Stakeholders

- Notify Boards, donors, regulators, and other stakeholders as appropriate in a timely manner and in compliance with agreements and regulatory requirements.
- Global Communications coordinates responses in case of global media coverage of allegations or events, and provides support to offices where necessary.

2.7 Appeals Process

- Offices must provide an internal **appeals process**, where permissible by local employment law.

2.8 Monitor and Continuously Improve

- Monitor the implementation of this Standard and provide updates on compliance to the WWF Network as requested.

3. Employee Rights and Obligations

Offices must ensure Staff are aware of the following:

- 3.1 **Employees are required to report concerns of illegal or unethical conduct** which they witness, or when they receive information from another employee, associated third party, or local communities. They may use any available reporting channel.
- 3.2 Employees must **cooperate with internal inquiries and investigations**, and Office of the Ombudsperson processes, in line with local labour laws. Failure to do so may result in disciplinary action.
- 3.3 Reports made in good faith do not require firm evidence.
- 3.4 Malicious or knowingly false reporting is prohibited and may result in disciplinary action.
- 3.5 Employees can report concerns anonymously and may request confidentiality. Every effort will be made to respect the request for anonymity.
- 3.6 Staff are encouraged to **use internal options** to report concerns (i.e. within their office management structure) before considering reporting to external organisations.
- 3.7 Individuals have the **right to appeal** the outcome of an internal complaints process in line with local policies and laws.
- 3.8 This Standard is **not meant to address every workplace concern**. Concerns around matters that do not rise to the level of potentially illegal or unethical conduct should be resolved informally or through management and human resource processes. However, if an employee fears retaliation or believes the issues will not or cannot be addressed locally, they may raise it through the WWF International reporting channel.

4. Responding to issues and allegations

Responding to concerns consists of a number of steps, which may include initial fact-finding, dialogue with complainants, formal investigation, engaging with donors and stakeholders, reporting to regulators, safeguarding victims or assets, and more. Each response differs depending on the context of the concern itself, including the requirements of local legislation.

Offices should always adopt the following principles when responding to issues and allegations:

- Respond promptly to protect individuals and assets.
- Ensure fairness, impartiality, and confidentiality throughout the process.
- Assume good faith of the reporting party unless proven otherwise.
- Take appropriate disciplinary or corrective action if misconduct is substantiated.
- Keep relevant parties informed, respecting confidentiality and legal privilege.
- Document all response steps to demonstrate accountability and good practice.
- Allow appeals where appropriate.
- Where concerns relate to actions by non-WWF actors (e.g. partners or their staff), **WWF should formally request** details of corrective and mitigating actions

5. Guidance, Support and related policies

- Global Reporting Channel: wwfinternational.ethicspoint.com
- [ESSF safeguard on grievance mechanisms](#)
- [WWF Ombudsoffice](#)

For more guidance on response to allegations and complaints, contact the Director, Workplace Investigations, WWF International.

Annex: Definitions

Staff: all employees, volunteers and interns 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.