Network Risk Management and Quality Assurance Standard

Approved by International Board in July 2020
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1. Introduction

This document sets out the requirements and expectations on all WWF offices with regards to Risk Management (RM) and Quality Assurance (QA).

A number of building blocks or components, such as appropriate risk structures, strategy, and processes, are needed for effective overall risk management in WWF. A summary of these building blocks / components is provided below. Risk Management is implemented when all components work together effectively and are considered in the context of pursuit of our strategic objectives.

QA is essential for us to ensure that we are taking all appropriate and required steps when we design, implement and monitor conservation projects. An important component of QA of our conservation projects is to ensure that risks are being managed within WWF’s risk appetite, and in general that relevant risks - to WWF and others - are being well managed to enable successful achievement of the desired conservation impact. These risks must be considered in relation to the potential reward - or impact - we are seeking, and balanced with them.

RM and QA are therefore critical processes to ensure successful and sustainable achievement of WWF’s goals and mission, and must be considered by all offices and in all projects according to the Standards set out below.

<table>
<thead>
<tr>
<th>Structures</th>
<th>Risk Strategy</th>
<th>Process</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What is our RM structure?</strong></td>
<td><strong>What is our risk approach?</strong></td>
<td><strong>How do we manage risk?</strong></td>
</tr>
<tr>
<td>Risk oversight and governance</td>
<td>Analyze business risk context</td>
<td>Risk identification</td>
</tr>
<tr>
<td>e.g. National Boards, (audit/risk committees), NET (Conservation Quality Committee, Global Partnerships Committee), SMT, Intern. Board …</td>
<td>E.g. Strategic plan context description, SWOT analysis, business model, Theory of Change</td>
<td>e.g. Office and Project Risk Registers, Safeguards Screening Tool, Climate screening tool, Partner Due Diligence, third party assessment, …</td>
</tr>
<tr>
<td>Roles and responsibilities</td>
<td>WWF Risk Appetite</td>
<td>Risk analysis &amp; evaluation</td>
</tr>
<tr>
<td>Roles defined for each level (project leads, line and executive management, supervision, independent assurance)</td>
<td>Defines how much risk we accept. E.g.: ESSF exclusions, Partnership black/ grey lists, Fraud and corruption zero tolerance, Investm. policy limits</td>
<td>e.g. Heat Map, prioritization of risks using WWF harmonized risk rating portfolio view, scenario analysis, …</td>
</tr>
<tr>
<td>RM desired culture</td>
<td>WWF strategy aligned to risk</td>
<td>Risk treatment and assurance</td>
</tr>
<tr>
<td>e.g. Values, Code of Ethics, Tone, Social policies</td>
<td>The organization evaluates alternative strategies and potential impact on risk profile e.g. Global goals and strategy</td>
<td>Network: Network Standards incl. RM and QA Standard, ESSF, …</td>
</tr>
<tr>
<td>Project managers and experts such as Safeguards, Legal, Financial controllers, partnerships, risk champions …</td>
<td>Conservation objectives</td>
<td>Office: signature limits, procurement, financial, HR, and other policies, Internal Control System, …</td>
</tr>
<tr>
<td></td>
<td>Align risk and objectives at various levels e.g. country strategy, operational plans, budgets, …</td>
<td>Project: Project and Program Management Standard, Risk register template …</td>
</tr>
<tr>
<td>Risk Resources</td>
<td>Portfolio view of risk</td>
<td></td>
</tr>
<tr>
<td>e.g. Financial, landscape, regional, or COVID19 risks, media, …</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Monitoring & Communication
2. Why we need to manage risks at a Network level

WWF is a closely interconnected network of offices; incidents in the Network have shown us that an event in one office can significantly impact all of WWF. We are as strong as the weakest link, and therefore need to ensure that there is an appropriate and common risk management framework which all offices apply.

WWF has adopted various Standards, Policies and Guidance to manage our risks in various situations, such as when taking funds from third parties, implementing conservation projects, or entering into corporate partnerships. The Environmental and Social Safeguards Framework (ESSF) addresses specific risks of negative impacts for people and the environment in our landscape programmes. We need to have a common framework to manage all risks such as strategic, political, environmental and social, capacity, fraud and corruption, legal, implementing partners risk, donor contract compliance, procurement, working conditions, eligibility of expenses, governance, reputational etc. whether on project, landscape, country or global scale.

Our network governance bodies (NET and the International Board) together with WWF International SMT and National Boards, are responsible for ensuring that risks are being appropriately managed throughout WWF, which requires all offices to follow a consistent and robust risk management framework with transparency and mutual accountability, to support oversight and monitoring of compliance.

3. Why risk management is important

- The ultimate purpose of risk management is to manage risks, balance risk and opportunity, and thus achieve our conservation goals.

- During strategic planning RM helps us to consider whether our assumptions are realistic and thus set appropriate conservation goals aligned with the organisational risk appetite.

- Risk consideration helps us to 1) ensure we have all required resources and support from stakeholders, 2) avoid pitfalls, and 3) embrace opportunities.
● WWF donors, partners and other stakeholders expect WWF to implement a reliable RM system. This builds donors’ trust, which then translates into WWF income, enhanced reputation, influence and eventually into greater conservation impact.

● On the process level, risk management allows us to avoid surprises, non-compliance and losses, to optimize resources, to identify priorities and to adopt risk-based measures and actions.

● RM helps employees to understand our risk appetite and framework and thus to feel safe to work with innovative approaches.

● RM and related assurance measures provide assurance to the International Board and National Boards that risks are managed in order to achieve our strategic goals.

4. WWF risk management principles

We will apply the following principles for risk management:

- **Risk oversight**: The Board (Note: NO Board/ International Board) provides oversight of the risk strategy. The Board reviews the significant risks, effectiveness of risk treatment and risk appetite in line with this Risk Management and Quality Assurance Standard;

- **Responsibility for risk management**: The Executive Management has the overall responsibility for risk management and reporting to the Board.

- **Risk ownership**: Everybody in the organisation is responsible for risk management in their own area. Each risk shall have a risk owner;

- **Risk culture**: The International Board, National Boards, NET and Senior Management Teams of Offices lead by example and demonstrate a strong commitment to risk management.

- **Embedded RM**: Risk management is a dynamic and ongoing process. RM should become embedded in WWF’s culture, strategies, governance, operations and processes;

- **Three lines of defence**: Risk management will be performed, reviewed and reported according to the three lines of defence model:

  1. Management: functions that own and manage risk (first line);
  2. Oversight/support functions: functions that exercise oversight over risk (second line); and
  3. Internal and external assurance: functions that provide independent assurance (third line).

Oversight functions and Internal Audit should have direct access to the Board to enhance their independence;

- **Risk alignment and context**: Risk management should be aligned with the organisation’s strategy, objectives, initiatives and should take into account external and internal contexts;

- **Risk appetite**: the global Risk appetite statement sets out the limits of risks WWF is prepared to take in pursuit of its mission

- **Shared RM Framework**: All risks should be managed within a common Risk Management Framework, including harmonised risk ratings (with common likelihood and impact definitions) and Glossary of terms.

- **Risks to be identified, mitigated and documented at Office, project and landscape levels**.
5. Risk Appetite Statement

Risk appetite defines the amount of risk WWF is willing to take in pursuing its objectives. Individual offices shall comply with the global risk appetite as outlined below.

5.1. Risk appetite introduction

WWF’s mission is both challenging and ambitious; we have learnt from over 50 years of experience that, with great care and attention, it is necessary to take certain risks, and we all must, in order to achieve the 2030 global goals to reverse the loss of nature.

To ensure the work of WWF protects people, nature, our staff, our finances, and our reputation from harm, this risk appetite statement sets out the limits of the risks we are prepared to take in pursuing our mission. It acts as a guide for staff who make decisions about risk and opportunity every day, and also to inform donors and other stakeholders about the levels of risk we are prepared to take in pursuit of specific objectives which would make taking those risks worthwhile.

This statement does not cover every possible activity, and so should be read together with WWF Standards, policies and brand values for a fuller picture of the steps we need to take in balancing risk and opportunity, or potential rewards, in decision-making. Analysis and judgement from those closest to the action will always be required to make sure we mitigate risks to appropriate levels, and when high risks are present additional review and approval steps are in place to ensure that we are consistent in acting within our risk appetite and ensuring that the risks we are prepared to take are balanced with the potential impact we are seeking to deliver.

The risk appetite statement will be reviewed on an annual basis by the Network Conservation Quality Committee for further recommendation to NET and the INTERNATIONAL Board (Audit, Risk and Compliance Committee.)

5.2. Generic risk appetite statements

- Take risk only in so far as it is necessary and appropriate to delivery of WWF’s goals. Greater rewards will justify us to take greater risks.
- We must balance the risks we are prepared to take with the opportunity, the cost of its mitigation, and its expected return. It is not possible nor suitable to fully eliminate risk.
- HIGH residual risks (after mitigation) on the heat map are deemed unacceptable. High residual risks therefore require timely mitigation, senior management oversight, and appropriate escalation, to identify additional or enhanced mitigation measures so the

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1 Risk residual means a level of risk remaining after consideration of the mitigating measures. Inherent risk means a level of risk before consideration of the mitigating measures.
2 See the risk heat map below and the risk ratings in the Appendices.
activity can be brought within limits for approval.

Specific risk appetite statements are further specified below for key activities and types of risks and are expressed on the risk heat map.

**Risk Heat Map:**

Every risk can be depicted in the heat map by assessing risk impact and risk likelihood. Use the impact and likelihood rating tables in the appendices.

The risk heat map shows that high residual risks (after mitigation measures have been applied) are unacceptable, therefore it is important to find ways to mitigate risks and bring them down to an acceptable level.

It should be noted that risks and situations are dynamic and therefore risks should be monitored on an ongoing basis to ensure they remain within risk appetite by applying additional mitigation measures if needed.

Critical risks to WWF (i.e. on the top row of the heat map), even if remote or unlikely to occur, should be assessed on a regular basis and reasonable mitigations planned to avoid potentially severe negative impacts.

The risk appetite is not a target but a maximum amount of risk. The risks in the heat map should be mitigated to as low as reasonably practicable. Especially where risks are close to the risk appetite line, the expectation is that further mitigation measures will be taken unless the costs of these measures are grossly disproportionate to the benefit gained. In all cases, the risks and associated investment in mitigation measures, need to be assessed against expected reward, to ensure there is a reasonable balance.
The rating criteria for likelihood and impact are described in the Appendices and are a basis for risk appetite.

### 5.3. Risk appetite for individual activities

Activities which are likely to adversely impact people/communities, WWF’s reputation or which are in non-compliance with regulations or donor contracts are above WWF risk appetite.

Other WWF standards and policies also provide specific limitations and exclusions and should be consulted (for example, see the Network standards [here](#)).

### 5.4. Risk appetite statements for various types of risks

<table>
<thead>
<tr>
<th>Risk impact category</th>
<th>Residual risk appetite</th>
<th>Specific Exclusions and Exceptions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>S - Strategic risks</strong> (Program delivery risks, external relationships and partnerships, external context risks)</td>
<td>MEDIUM</td>
<td>● Any WWF corporate partnership should adhere to all Network conservation and corporate engagement policies (as approved by Global Partnership Committee and/or NET). An important policy regards the black-listed industries.</td>
</tr>
<tr>
<td><strong>F – Financial</strong> (FX, Market, ...)</td>
<td>MEDIUM</td>
<td>● We will not invest directly into fossil fuels or other blacklisted entities, (an exception).</td>
</tr>
<tr>
<td><strong>P – People</strong> (Health and Safety and security, Volunteers and sub-contractors)</td>
<td>MEDIUM</td>
<td>● We have a LOW risk appetite for engaging persons with demonstrably bad reputation. (exception)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● We take all reasonable measures to protect our staff.</td>
</tr>
<tr>
<td><strong>O - Operation/ Quality</strong></td>
<td>MEDIUM</td>
<td>● LOW residual risk appetite of data corruption, leakage or loss or IT system downtime. (exception)</td>
</tr>
<tr>
<td>(Governance and oversight, Assets, Data and IT, Business processes)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>R - Reputation and fiduciary</strong> (fraud, non-compliance, adverse media coverage, brand)</td>
<td>MEDIUM</td>
<td>● MEDIUM risk appetite but ZERO tolerance to certain reputation and fiduciary risk incidents such as fraud and corruption, harassment and bullying and non-compliance with legislation. See relevant network standards.</td>
</tr>
<tr>
<td><strong>E&amp;S - Environmental and Social</strong></td>
<td>MEDIUM</td>
<td>● We apply ZERO tolerance of E&amp;S risk incidents directly related to WWF activities.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● We apply ZERO tolerance for breaches of exclusions in WWF E&amp;S policies and standards. See ESSF exclusion list.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>● We take all reasonable measures to protect communities and other stakeholders.</td>
</tr>
</tbody>
</table>

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3 The risk level can be determined by considering the risk impact and likelihood in Appendices A and B and applying to the risk heat map.

4 Zero tolerance means we will immediately adopt bold corrective measures to prevent any further risk incident.
6. Roles and responsibilities for risk management

Ensure that roles and responsibilities for risk management are formally defined by each office including for the Board and its committees, Senior management, risk owners, risk manager and other employees. See the example role definition in the RM Handbook.

Appoint one person with the overall responsibility for coordination of the Risk Management function (Risk champion) who will participate in the Network risk community to learn and share best practice and keep abreast of internal updates. Where an office may not be in a position to establish a separate position for risk management, the responsibility for risk management support and coordination may be included in another role description (for example that of the Finance or Operations Director).

The risk champions list will be administered by WWF International and published at the RM Resource Hub.

7. Adopt common language

Every office shall adopt common language as defined below to enable effective communication and escalation. Use the harmonized risk rating and risk heat map. This will allow common understanding and communication of risks, allow risk appetite to work, and enable monitoring of the critical network risks and global reporting to NET and the International Board.

Key terms shall include:

- **Risk** is the effect of uncertainty on objectives. In other words it is the possibility that an event will occur and affect the achievement of objectives. Risk can have both negative and positive effects. Our aim is to manage the adverse effects, benefit from the opportunities and turn the risk into conservation value.

- **Control** refers to a measure that is designed to modify risk.

- **Risk management (RM)** -coordinated activities to direct and control an organization with regard to risk.

- **High/Medium/Low risk** – in order to speak with the same language about risks, we have to define what high, medium and low risk mean. Risk magnitude is described as a combination of its likelihood and impact. In order to describe various combinations of risk impacts and likelihood we use a risk matrix (risk heat map). Individual likelihood and impact rates and the risk matrix are described in separate tables in the APPENDICES.

- In order to measure how effective our measures are to mitigate risk, we assess risk twice. First time before mitigation ie. **Inherent risk** and second time after mitigation ie. **Residual risk**.

- Other terms aligned with ISO 31000:2018 standard are defined in the RM Handbook.
8. RM process

In WWF the majority of financial, security, political, operational and other risks materialise at two levels: the project level and office levels. Therefore there is a need to implement robust processes at both levels that can support offices in navigating risk and project risk management. Indemnifying projects from potential risks in all categories. Landscape application level can also be used in addition to office level (e.g. Environmental and Social risks, which are covered in more detail in the ESSF).

8.1. Develop an office risk register

Develop and document an office risk register, which includes key strategic and operational risks aligned to strategic objectives, covering all functions of the office. Review and update (as appropriate) this register at least every three months.

Example Office risk register template with detailed guidance is available in the RM Resource Hub.

8.2. Develop a project risk register

For higher to medium risk conservation projects, develop and document a project risk register. See the project risk register template for further guidance. It is available at the RM Resource Hub.

The Project and Programme Management Standards include guidance on how to assess whether a project risk register is necessary depending on the risk level, as follows:

- Low risk - No separate risk assessment - identify and manage risks as part of project design, planning, and implementation
- Medium risk - Simplified risk assessment to ensure key risks and mitigation measures are identified and owned by the project team
- High risk - Full risk assessment i.e. use the risk register template or a similar template to ensure the main risks are documented, their likelihood and impact are assessed, together with mitigation measures and owners to ensure implementation

A Project risk register example with further guidance is available here: Project Risk Register Template, or accessible via RM Resource Hub.

Note 1: Various special processes, such as ESSF, Corporate partnership policies, Climate screening tool etc., contain specific process-level risk assessment guidance and templates which must be followed in addition to the points above.

Note 2: WWF International managed offices shall upload the office and project risk registers in the global risk management IT tools (Global Risk Drive). This will allow reporting across all risk registers in the Tableau reporting tool. All other offices are encouraged to use the same IT tools.
Further technical guidance on the RM process e.g. methods to do risk identification etc. are available in the [RM Handbook](#).

### 9. Project Quality Assurance (QA)

Delivering global conservation impact successfully, with consistent quality, and while ensuring WWF takes appropriate legal and brand protection steps requires a robust quality assurance approach to be in place in each office, and for WWF as a whole.

**QA Principles**

There are several principles which will apply in implementing a network wide QA approach for it to be effective:

- **Maximum local ownership and accountability**: Offices are supported and guided to take responsibility for design and first reviews with local quality assurance measures in place.
- **Three lines of defence**: management, supervisory functions and independent audit.
- **One common framework**, standards and systems available for all offices, with local tailoring or enhancement as required for specific donors or legal context.
- **Clear and transparent communication, decision-making processes** and governance that enforces decisions and agreed standards.
- **One common place for project documentation (e.g. a drive)** for quick access to shared project documentation and specialist review.
- **Minimal additional review and approval layers**: escalation to WWF International colleagues/Network colleagues/Governance only when certain criteria are triggered.
- **Network-wide transparency on key landscape and project information**, high risks, and pipeline.
- **Independent review and attestation of compliance** with the network standards – results to be communicated within the network.

**QA Steps for all offices to follow**

As part of this overall approach, every office must follow these essential steps in conservation project management for quality assurance purposes:

1. Each office ensures it has a documented robust QA procedure for project concepts and full proposals which will help to maximise conservation impact and manage project risks within WWF’s global risk appetite. This should be carried out for Landscape projects in conjunction with the Safeguards Screening where appropriate and as prescribed in the [Environmental and Social Safeguards Framework](#).

2. Share up-to-date essential information on projects, landscapes, and related risks in a common Network database (at each stage of project design and implementation). This will allow that relevant information can be collected and analysed centrally on WWF’s conservation portfolio and related risks, in a timely manner.

3. Ensure that high risk projects are escalated within the office (and to National Boards where appropriate) for quality review by relevant experts and senior colleagues (see detailed
guidance below) before proceeding either from concept to proposal, or from proposal to implementation stage. For offices managed by WWF-US or WWF International an additional guidance may apply.

4. Once reviewed within the office and within WWF US or WWF International, if applicable, ensure that high risk projects (concepts or proposals) and/or high risk category Landscapes, meeting certain criteria are then escalated to the Network Conservation Quality Committee, for peer review and sign-off on proceeding in a way which manages risks to WWF and stakeholders on the basis of identified risks and mitigation measures. Follow the escalation criteria and procedures published at the Committee’s website.

Escalation protocols for all offices

Review by relevant experts and senior colleagues

Project Quality Assurance requires review by relevant experts and senior colleagues, but in particular for high risk projects to ensure these are managed within WWF’s risk appetite. Risk affects all areas of WWF’s work and there are potentially many areas which require specialist knowledge and skills such as:

- Legal and contractual
- Partnerships
- Brand communications
- Security: people, IT
- Health and safety
- Business continuity
- Fiduciary risk
- Internal financial controls
Responsibility statement

WWF Office leaders are accountable for the implementation and full compliance with this Standard, overseen by National Boards where relevant.

Conservation Project Managers are responsible for following the risk management and project quality assurance steps outlined herein for their projects, supervised by their Conservation Director and/or Country Director.

The Network Conservation Quality Committee will provide peer review and sign-off on high risk projects and/or Landscapes escalated from any office, on behalf of NET. The Terms of Reference for the Committee and further information is available at the Network Conservation Quality Committee - Website.

WWF International will provide the support, training, tools and systems for all offices to use and adapt according to any additional local requirements.

NET and the International Board set this Standard and monitor compliance by offices.

This Standard is applicable to all WWF offices.

This Network Standard was endorsed by the NET and the International Board in July 2020.
## Appendices

### A. Likelihood Rating Table

<table>
<thead>
<tr>
<th>Rating Level</th>
<th>Probability</th>
<th>Frequency of occurrence</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Remote</td>
<td>&lt;5% (rare to occur)</td>
<td>May occur in the next 20 years</td>
</tr>
<tr>
<td>2 Unlikely</td>
<td>&lt;25% (could occur some time)</td>
<td>May occur in the next 6 years</td>
</tr>
<tr>
<td>3 Moderate</td>
<td>25-50% (might occur)</td>
<td>May occur in the next 3 years</td>
</tr>
<tr>
<td>4 Likely</td>
<td>50-75% (probably will occur)</td>
<td>May occur in the next 1 year.</td>
</tr>
<tr>
<td>5 Very likely</td>
<td>&gt;75% (expected to occur)</td>
<td>May occur in the next 3 months</td>
</tr>
</tbody>
</table>

Note: Use one of the columns as appropriate. There are many situations and activities where probability and frequency numbers can not be exactly calculated. In such situations the best possible, although subjective, professional estimate shall be used.
This table provides a simple view of severity of potential impacts per risk category. It is important to consider potential compound impacts across categories when assessing risks, and to carefully consider trade-offs between delivery of strategic objectives (which requires us to take risks) and potential risk impacts.

<table>
<thead>
<tr>
<th>Rating level</th>
<th>Strategic objectives &amp; program delivery</th>
<th>Reputation</th>
<th>Environmental and Social (E&amp;S)</th>
<th>Financial (CHF/USD)</th>
<th>Operational</th>
<th>People (staff)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Negligible</td>
<td>Negligible or no impact on office strategic objectives</td>
<td>Negligible or no damage to reputation</td>
<td>Non or minimal negative E&amp;S impacts – up or downstream.</td>
<td>&lt; 100K</td>
<td>Minimal effect on the office operations</td>
<td>No apparent injury</td>
</tr>
<tr>
<td>Minor</td>
<td>Minor impact on office strategic objectives</td>
<td>Minor damage to reputation</td>
<td>Impacts are neither irreversible nor cumulative. Adverse impacts can be addressed &amp; there is demonstrated record of their successful use in the project area</td>
<td>100K to &lt; 500K</td>
<td>Small effect on the office operations</td>
<td>Displeasure of staff voiced internally only</td>
</tr>
<tr>
<td>Moderate</td>
<td>Moderate adverse media coverage</td>
<td>Moderate adverse media coverage or complaints</td>
<td>Local communities are not aware of the risks and potentially adverse impacts or mitigation strategy</td>
<td>500K to &lt; 1 million</td>
<td>Some impact on the office e.g. delay in some processes</td>
<td>Minor injury/first aid on site</td>
</tr>
<tr>
<td>Major</td>
<td>An office strategic objective cannot be achieved</td>
<td>Major damage to reputation and / or credibility in one or more countries</td>
<td>Impacts are unprecedented in the project area</td>
<td>1 million to &lt; 5 million</td>
<td>Major impact on office e.g. key business processes interrupted</td>
<td>Displeasure of staff voiced externally</td>
</tr>
<tr>
<td>Critical</td>
<td>Significant adverse media coverage for a number of days and countries</td>
<td>Signiﬁcant adverse media coverage</td>
<td>Significant, irreversible and/or cumulative negative E&amp;S impacts. Protests by affected communities, unsafe for WWF staff to engage in consultation/dialogue</td>
<td>&gt; 5 million</td>
<td>Critical impact on one or more offices e.g. licence loss, frozen govt. relationships, IT or Financial system failure</td>
<td>Multiple loss of life or serious injury</td>
</tr>
</tbody>
</table>

1. Negligible
2. Minor
3. Moderate (above risk appetite if Very likely)
4. Major (above risk appetite if Very likely, Likely)
5. Critical (above risk appetite if Very likely, Likely or Moderate)
### WWF Risk Taxonomy

<table>
<thead>
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</tr>
</thead>
<tbody>
<tr>
<td>1.1 Programme delivery</td>
<td>2.1 Liquidity risk</td>
<td>3.1 Beneficiary Health, Safety and Security</td>
<td>4.1 Data and IT</td>
<td>5.1 Breach of Obligations</td>
<td>6.1 Environm. Impact</td>
</tr>
<tr>
<td>1.2 External relationship</td>
<td>2.2 Market</td>
<td>3.2 Employee Health, Safety and Security</td>
<td>4.2 Business process</td>
<td>5.2 Fraud and Corruption</td>
<td>6.2 Social Impact</td>
</tr>
<tr>
<td>1.3 Context</td>
<td></td>
<td>3.3 Partners and Vendors</td>
<td>4.3 Governance and Oversight</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4.4 Assets</td>
<td></td>
<td></td>
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