



**CODE**

INT

**2015**

loyalty

integrity

trustworthiness

fairness

# ETHICS FOR IMPACT

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WWF INTERNATIONAL CODE OF CONDUCT  
JULY 2015

PUBLIC VERSION

# FOREWORD

Over the years, WWF has become one of the most respected conservation organizations in the world. We have built an extraordinary reputation worldwide by delivering significant conservation outcomes and combining that with world class ethics and integrity in the pursuit of our Mission. This combination is what makes us uniquely successful.

We are a global multi-cultural organization, yet deeply rooted locally. We use ethics and integrity as one of our most important cultural bridges to navigate in this diversity. A culture which fosters ethics and integrity is powerful, especially in today's increasingly complex world with historical societal shifts. It helps us achieve our full potential: we work better together, build local legitimacy and earn the trust of our donors, supporters, governments and partners.

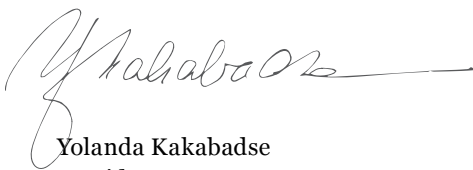
This is why, no matter what we do or where we work, we respect at all times WWF's values of compliance and ethics: loyalty, integrity, trustworthiness, and fairness. These values protect us individually as well as our organization. We want our leaders to lead by example and to uphold and foster a culture of compliance, ethics and integrity, and to provide a secure and respectful environment to help those who come forward in good faith with concerns.

This Code of Conduct is designed to help each of us understand and meet fully these values. It explains how we can get help if we come across legal and ethical dilemmas in our daily work and how to report it if we witness something of concern. Each of us is required to comply fully with this Code.

Thank you for your commitment to uphold our values of compliance and ethics in every occasion. Keep this Code handy and make it your own. Respect it and make sure it is respected around you. Remember, the spirit of the Code is as important as the letter. Come to us if you have questions.

We are all proud of working for WWF. Help us keep it that way and bring a powerful WWF to future generations and deliver impact at scale.

**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.**



Yolanda Kakabadse  
President



Marco Lambertini  
Director General

WWF is one of the world's largest and most experienced independent conservation organizations, with over 5 million supporters and a global network active in more than 100 countries.

WWF's 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 conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption.

A WWF International production

Published in July 2015 by WWF – World Wide Fund For Nature (also known as World Wildlife Fund), Gland, Switzerland.

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# SOME BASICS BEFORE WE START

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## WHAT IS THE CODE OF CONDUCT AND IS IT FOR ME?

This Code of Conduct is for all employees, volunteers, interns, etc. (“staff”) at WWF International and its field offices (“WWF”). Compliance with this Code is a condition of employment.

## HOW IS THIS CODE RELATED TO OUR EXISTING CODE OF ETHICS?

WWF’s Code of Ethics, summarized below, sets the seven principles that we embrace at WWF of how we interact with our world and conduct ourselves towards others. This Code of Conduct guides us in how to “live” WWF’s ethical values on a daily basis.

### PRINCIPLES

1. Be global, independent, multicultural and non-party political.
2. Use the best scientific information and evaluate our endeavours.
3. Seek dialogue.
4. Build concrete conservation solutions holistically.
5. Involve local communities and respect their needs.
6. Maximize our effectiveness by building partnerships.
7. Run operations responsibly, with accountability and transparency.

### OUR WORLD

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

### OURSELVES

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

## WHAT DO ALL THESE CONCEPTS MEAN?

Ethical behaviour: Morally good or correct conduct.

Integrity: The quality of being honest and having strong moral principles.

## DOES THIS CODE EXPLAIN ALL THE STANDARDS I NEED TO KNOW?

This Code is a compilation of our existing policies and is intended as a user-friendly overview. For details, we must refer to the relevant policies. This document is not exhaustive. Other WWF or WWF Network policies may exist, be implemented or updated from time to time.

## 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. Please contact local human resources staff to understand these rules. 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. There are lots of important things managers should do to show Tone at the Top: by visibly displaying their respect for and compliance with these rules, treating their colleagues and our partners with professionalism and respect, doing the right thing when a concern is raised, and responding in an appropriate manner.

## WHAT DO I DO IF I AM NOT SURE?

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

1. Is my action legal, honest, ethical, 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?

For help, start with your Local Management, or Human Resources contact. Otherwise, please contact Donna Lusti, WWF International, Manager, Governance & Compliance ([dlusti@wwfint.org](mailto:dlusti@wwfint.org)). If you cannot use these internal channels, please see Section 8 in this document.

This Code of Conduct was released in June 2015 and can be read on OneWWF [here](#). A summarized version of this Code is published for external audiences [here](#) on panda.org.

Questions and requests for guidance are welcome.

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Donna Lusti  
Manager, Governance & Compliance  
[dlusti@wwfint.org](mailto:dlusti@wwfint.org)

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# 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 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, colour, national or ethnic origin, religious or political affiliation, gender, marital status, sexual orientation, disability, class, age, or being affected by HIV/AIDS.

WWF actively pursues gender balance at all levels of the organization and ensures that conservation 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. Managers are responsible for the good conduct of their teams and to actively seek to correct problems.

**Harassment:** offensive, intimidating, demeaning, hurtful, malicious or threatening comments or conduct towards another person, demonstrated repeatedly. This includes bullying.

**Sexual harassment:** coercion of a sexual nature, or the unwelcome or inappropriate promise of rewards in exchange for sexual favours.

## 1.3. PROTECTION FROM RETALIATION

WWF is committed to protect employees who share concerns of inappropriate activities reported in good faith 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 herein (see in Section 8 “Raising Concerns”).

## 2. I RESPECT SOCIETY AND 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 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 SOCIAL 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 the every stage of our conservation work.

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

We help reduce poverty in our conservation efforts, by proactively working with resource-dependent communities, and addressing the trade-offs between conservation and poverty reduction goals.

### 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, referred to herein (see in Section 8 “What about concerns regarding WWF’s social commitments?”)



## 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 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, and are seen to be, 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. (See also in Section 5 “Accepting Entertainment, Hospitality or Gifts; and Section 6 “Money and Finances.”)

### 3.2. DATA PROTECTION

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

## 4. I STAY SAFE AND ENSURE OTHERS' 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 reasonable steps to ensure health and safety of staff and to manage health, safety and security risks. We have an active role in protecting our own health, safety and security. For example, we always wear our seatbelt, respect speed limits, and before we travel, we make sure our vaccinations are up to date and check the official medical and security guidance for destinations in particular in high-risk regions. We do not use blacklisted airlines, and comply with the local health, safety and security rules and procedures.

If we feel that our health or safety is at risk, we have a right to voice this concern and, if warranted, to refuse an activity we deem dangerous without that refusal reflecting badly on our performance or incurring repercussions.

### 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.

## 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. AVOIDING 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 cannot be, or perceived to be, abused.

### 5.2. WORK AND ACTIVITIES OUTSIDE WWF

Paid work outside of our job must always be disclosed to our Manager and Human Resources. Additionally, in some countries it may be restricted or prohibited.

### 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 seen to be, non-material and not intended to influence business transactions, or to be personally beneficial. All gifts received should be reported to line management. 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 Section 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 shall not engage in outside or personal activity that competes or disagrees with WWF Mission and our principles, such as trading or using products from endangered species (e.g., rhino horns).

#### 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.

## 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 expense 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 Section 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.**

All purchases of goods and services beyond a threshold, including engaging consultants and contractors, is subject to prior due diligence. This includes seeking and reviewing competitive bids, 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.

#### **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.

#### **Ensuring 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.

#### **Maintaining accurate books and records.**

We prepare and keep accurate, truthful, transparent, complete, and up-to-date information (including records, reports, and expense claims). We have a legal duty to keep these records, for audit purposes, a legal procedure or upon request from authorities. We must 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, fax, 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 and we pay for our personal use. If lost, damaged or stolen due to negligence, we may be required to compensate WWF. We must use phones, internet access, reasonably to reduce time charges.

## 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 Section 7 – "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 authorised 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.

Tips: 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.

## 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 section 6, "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 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); publish proprietary information or breach confidentiality; denigrate other organizations, companies, individuals or WWF; or knowingly provide false or inaccurate information.

### 7.4. MEDIA INQUIRIES AND CRISIS MANAGEMENT

At times, there might be negative media or publicity including 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 been allowed to communicate, we only use the agreed messaging, and communicate transparently, honestly, accurately, and respecting brand guidelines.



#### 7.5. TOLERANCE AND RESPECT AT INTERGOVERNMENTAL FORA AND PUBLIC EVENTS

All WWF staff's personal conduct at intergovernmental fora and other public events must act impeccably at all times. This includes 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.

## 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. Additionally, we take advantage of customized and one-to-one training which are offered.

### 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 approach a trusted local senior staff (our Manager, Human Resources contact, Legal, or Senior Management). WWF also has an independent whistleblowing process, which is available to all staff and contracting parties throughout the WWF Network.

### 8.4. WHAT ABOUT CONCERNS REGARDING WWF'S SOCIAL COMMITMENTS?

We have a mechanism for local communities and organizations to raise concerns if they believe they have been negatively impacted by WWF's work, and who wish a dialogue with WWF to resolve them. Eligible organizations may air concerns by writing to [ProjectComplaint@wwfint.org](mailto:ProjectComplaint@wwfint.org) or directly to the Director General. See also in Section 2 "Being Open to Concerns from Communities".

#### 8.5. CAN I REPORT ANONYMOUSLY? WILL I BE PROTECTED FROM RETALIATION?

If it is allowed by applicable law, anonymous reports will be accepted. Please remember, the investigation can be facilitated if we identify ourselves as we can be contact to give more information that can be needed during the investigation. WWF protects us against retaliation (see Section 1).

#### 8.6. WHO RECEIVES MY REPORT, AND HOW IT WILL BE HANDLED?

All reports are handled confidentially by the Manager, Governance and Compliance and Chief Operating Officer at WWF International. They inform the WWF Audit Committee, which reports directly to the WWF International Board. WWF will promptly conduct an investigation, keeping the identity of all those involved strictly confidential and in compliance with data protection laws. The reports will be shared only to the extent strictly necessary for the investigation and the subsequent procedures, for example, with the General Counsel, Director People & Organizational Development, Director Finance, and external advisors such as forensic investigators, lawyers.

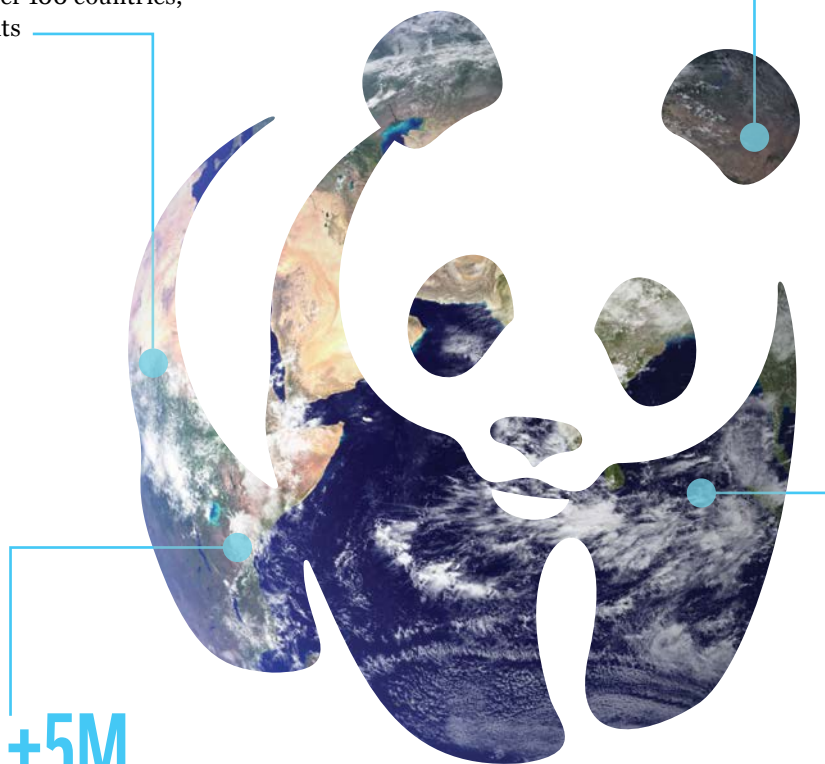
# WWF in numbers

## 1961

WWF was founded in 1961

## +100

WWF is in over 100 countries,  
on 6 continents



## +5M

WWF has over 5 million  
supporters

## +16M

WWF has over  
16 million followers  
on Facebook, Twitter  
and Google+

## Canon

This annual review was printed by Canon Europe on FSC paper, to reduce the environmental impact. Several images used in this review were taken from the WWF-Canon Global Photo Network. Canon Europe has worked in partnership with WWF since 1998, providing funding and in-kind support, with a shared vision of raising awareness of environmental issues and advancing conservation.



### Why we are here

To stop the degradation of the planet's natural environment and  
to build a future in which humans live in harmony with nature.

[panda.org](http://panda.org)

