WWF International Conflict of Interest Policy

The WWF Conflict of Interest Policy is designed to assure the highest level of ethical conduct of persons employed by or involved in the governance of WWF and to avoid perceptions and consequences detrimental to WWF that could arise from the real or perceived misuse of an individual's position or influence.

Any member of staff who has an actual or perceived conflict of interest with WWF shall notify the Representative (at regional level) or Country Director (at country level) of such conflict in writing, and staff members shall notify the HR Director (at regional level) or HR Manager (at country level).

A conflict of interest is defined as an interest that might affect, or appear to affect, the judgment or conduct of an individual associated with WWF. A conflict of interest may exist when the real or potential interests of any director, or staff member, or close relative, or any individual, group or organization to which he or she has allegiance, competes with the interests of WWF, or may impair such person's loyalty to WWF. For example, a conflict of interest may exist if such person:

- Has a more than 5 per cent business or financial interest in a third party dealing with WWF.
- Holds office, serves on a Board or is employed by any third party dealing with WWF.
- Derives financial gain from transaction(s) involving WWF.
- Receives non-monetary gifts from any third party above a reasonable value e.g at WWF International this value is CHF 50, unless they are made available to the whole team, or placed in a common area.
- Engages in any outside activity that will materially affect obligations to WWF, competes with WWF’s activities, jeopardizes WWF’s reputation or on-going work in region, involves WWF equipment, supplies or facilities, or implies WWF support of the activity.

Should a change in circumstances arise in the course of employment that might trigger a conflict of interest, staff undertake to spontaneously inform their Line Manager or HR Director (at regional level) or HR Manager (at country level).

To ensure that appropriate disclosure of potential conflicts of interest is done, all staff members are required to complete a Conflict of Interest Disclosure form (see attached template) on an annual basis. This form shall be copied to the staff member’s line manager, and kept on file in the Human Resources files.

Staff are bound by rules of discretion in regard to all matters of WWF business externally or internally. They shall not communicate to any third party information not already made public that is known to them because of their position within the organization. They shall not use such information to personal or third party advantage, or to the detriment of WWF. These obligations shall not cease upon termination of employment. Staff will familiarize themselves with the organization’s detailed policies and procedures and ensure that they are implemented. Staff have the right to use the organization’s information system services in work that is directly related to their terms of reference. The use of network and email services for personal purposes is permitted to a reasonable extent. The use of these services for illegal, commercial or political purposes is forbidden. Photos, videos and written material related to WWF’s work produced whilst being employed by WWF must be made available to the WWF Network, without any further payment or compensation, for use during and after the employment term. Nevertheless, "Intellectual Property Rights" (Copyright) always remains with the employee, unless otherwise stated.
WWF International

Conflict of Interest Disclosure Form

Instructions to All Staff: Please read below, and complete the Acknowledgment and Disclosure Form that appears at the bottom of this document, and return it to your Human Resources senior officer with a copy to your supervisor. This form should be completed and signed on an annual basis. You will be advised of such update requests by your Senior Management Team.

Every staff member of a WWF International Programme Office (or other office ultimately reporting into WWF International) is required to be familiar with and in compliance with the Conflict of Interest policy, which forms part of the WWF International Human Resource Policies and Procedures (version March 2012, see section 1.4 “Conflict of Interest”). The link to these policies and procedures is as follows:


As per this policy, each staff member must make annual disclosure of potential conflicts of interest, as described below.

What is a "Conflict of Interest"?

There is a potential conflict in any situation in which questions might be raised whether a decision was made solely for the benefit of WWF and to advance the cause of conservation, or whether there were competing concerns, most notably gain or favor for an individual associated with WWF, his or her family, or organizations related to such persons.

For instance, the following would present potential conflicts (please also refer to the Policy):

- a department is evaluating a proposal from a consultant who has a close relative on our staff
- a proposed recipient of an award or stipend is related to someone at WWF
- an employee wishes to hold public office or serve on the board of a local conservation organization or an advisory committee of a corporate partner
- a staff member who volunteers for another organization is asked by that organization to fundraise
- an employee receives non-monetary gifts from a third party above a reasonable value (e.g., at WWF International this value is CHF 50), unless made available to the whole team, or placed in a common area. (Receipt of monetary gifts is strictly forbidden.)
- a vendor offers a staff member free merchandise in exchange for continuing business
- a staff member takes on paid work from another organization, or receives payment for services as a consultant

* National Organizations are encouraged to adapt this template for their own use.
• a staff member is a part owner of or has a financial interest in any third party dealing with WWF
• an employee engages in outside activity that will materially affect obligations to WWF, competes with WWF’s activities, jeopardizes WWF’s reputation or ongoing work, involves WWF assets, or imples WWF support of the activity.
• an employee's spouse works for WWF

These are only a few examples meant to illustrate the concept of possible conflict of interest. In each instance, the situation needs to be disclosed and reviewed in advance as described below. Staff members are required to be familiar with this policy and are accountable for compliance with it.

**Required Disclosure**

**All staff.** Staff with a potential conflict of interest must make disclosure of the situation and all relevant facts to their supervisor and/or senior management team at the earliest possible juncture (and well before any decision is made or expected regarding the particular situation that raises a concern about a conflict). Staff should consult their supervisor, the senior Human Resources officer for their office, or PO Representative or Country Director with any questions or for help in preparing the disclosure form.

In addition to the ongoing obligations of all staff members to disclose potential conflict situations, staff must sign an "Annual Acknowledgment and Disclosure Statement," a copy of which is attached. **Annual disclosure of relationships and potential conflicts does not relieve staff of the obligation to raise a particular potential conflict when it arises.**

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Annual Acknowledgment and Disclosure Statement Form†

_____ I have read and subscribe to the above Conflict of Interest Policy. To the best of my knowledge, I have no conflicts as described in this policy.

________________________________________________________________________  ______________________________________________________________________
Signature                                      Date

____________________________  ______________________________
Name (please print)

OR

_____ I have read and subscribe to the above Conflict of Interest Policy. To the best of my knowledge, I have no conflicts as described in this policy, except those noted below or on the attached paper.

________________________________________________________________________  ______________________________________________________________________
Signature                                      Date

____________________________  ______________________________
Name (please print)

<table>
<thead>
<tr>
<th>Potential Conflict</th>
<th>Reason for Conflict</th>
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<tr>
<td>Sample: Wife is CEO of local NGO</td>
<td>Said NGO receives occasional contracts from WWF</td>
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<td>2.</td>
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<td>3.</td>
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Questions?
Please contact WWF International’s People & Organizational Development Unit or Donna Lusti, Manager, Governance & Compliance, WWF International dlusti@wwfint.org

† To be completed and signed on an annual basis. The timing of this procedure is at the office’s discretion, although it is recommended that it be completed during the annual performance review process, and simultaneous to the annual signed acknowledgement of the WWF International Policy on the Prevention of Fraud & Corruption.