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WWF-NORWAY CODE OF ETHICS AND CONDUCT

(Updated November 2014)

OUR WORLD

WWF-Norway will at all times seek to minimize the negative environmental impact of our activities, and make sure that our activities always comply with all environmental protection legislation. In its' daily operations, WWF-Norway will practice what it preaches by doing all it can to reduce pollution and waste, and wherever possible use renewable and recyclable materials. We will encourage all those with whom we interact to do the same.

WWF-Norway will practice and promote the best possible ethical standards when it comes to social, environmental and economical management, and use our resources, including human and financial, in a way that is in accordance with the standards and regulations supported by UN and international organisations. Fighting corruption and economic mismanagement will also be promoted by WWF-Norway.

OURSELVES

1. **Our behaviour towards each other.** We will at all times respect the rights of our colleagues, welcome the strengths of our differences, enjoy the richness of diversity, treat each other with dignity and respect, encourage teamwork and collaboration, foster an atmosphere of candour and openness, whilst always condemning all forms of discrimination, corruption and political manoeuvring.
2. **Our behaviour towards the public at large.** Just as we respect the cultural and ethnic diversity of our colleagues, so we respect the diversity of the peoples of the world. In our dealings outside our organization we will always be honest and open, never discriminate or pre-judge others for cultural, ethnic, religious or political or any other reasons. We will record and respond to criticisms we receive, in order to learn from, and avoid repeating mistakes.
3. **Our behaviour towards governments.** As a global, multi-cultural organization, we embrace the concept of "better together"; we recognize and encourage cooperation and collaboration with governments, particularly as the formally-mandated institutions responsible for governance. We will strive to cooperate with government authorities, supporting implementation of relevant policies where applicable, while maintaining our independence and vigorously defend our point of view, including when this is opposed to government policies and practices.
4. **Our behaviour towards other organizations.** As a global, multi-cultural organization, we embrace the concept of "better together"; we recognize and encourage cooperation and collaboration with like-minded organizations. While their missions may not be the same as ours, we recognize the validity and value of their goals. At the same time, we maintain our



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independence and vigorously defend our point of view. We will always share credit with our partner organizations, be they strategic, funding or implementing partners.

5. **Our behaviour towards the media and opinion influencers.** While we recognize and appreciate the value of the world's media in disseminating our point of view and informing governments, industry and the public at large of our mission and goals, we will always be honest, unambiguous and non-party-political in all contacts with them. We will do all we can to prevent our statements being manipulated or misused in order to support any political, ethnic or religious viewpoints with which we disagree.
6. **Our behaviour towards our corporate partners.** In order to achieve our mission, we recognise the need to engage with the corporate sector and foster active cooperation with sector leaders. We will work with our corporate sector partners in a professional, open, honest and straightforward way. We will maintain our independence whilst respecting their views and we will challenge and inspire them to move towards a more sustainable future.
7. **Our behaviour towards our suppliers and consultants.** In selecting outside, independent resources, we will at all times be fair, objective and open-minded in our assessment of their abilities. We will not accept favours or bribes, and we will not allow any tokens of appreciation we are offered to affect our judgement. We will not allow family, religious, tribal, political or any other personal connections to influence the award of contracts.
8. **Our behaviour towards our institution.** We will at all times conduct ourselves in a manner which brings credit to WWF and which enhances the efficiency and effectiveness of our organization. We will be careful custodians of the funds placed in our care, managing them with stringent honesty and transparency and constantly seeking the most cost-effective solutions, even at the price of personal inconvenience.
9. **Our behaviour towards our WWF partners.** Recognizing the different cultures, ways of living and traditions, as well as the vulnerable and often strongly socially segregated countries we work in, we will cooperate with our partners in the network focusing not only on channelling funds, but also on adding value in dialogue and cooperation for a pro-poor-conservationist approach.

To the extent possible will see to it that the operations are run in a socially responsible, environmentally-friendly and cost-effective manner, ensuring that funds are used according to the highest standards of accountability and transparency, and that both possible social and environmental negative impacts are minimised.



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WWF-NORWAY STAFF AND BOARD MEMBER CODE OF CONDUCT

WWF-Norway staff and board members (hereafter referred to as personnel) have a responsibility to the organisation to strive for and maintain the highest standards in the day-to-day conduct of their work in accordance with WWF's core values and mission, including promoting respect and mutual understanding, solidarity and good relations in the organisation. Each individual personnel member should see their role in promoting the highest standard of management of resources, including fighting corruption, unhealthy economic relationships and any form of misuse of resources. As such, the following Code of Conduct should be adhered to at all times.

Discrimination

WWF personnel must not discriminate in any way. Common forms of discrimination may include making employment or programming decisions based on family status, race, membership of the traveller community, gender, religion, colour, national or ethnic origin, language, marital status, birth, sexual orientation, age, disability, or political conviction.

Conflict of Interest

All personnel should avoid situations in which their personal and/or professional interests may conflict, or appear to conflict, with the interests of WWF or its programme participants.

No personnel member should be involved in awarding benefits, contracts or employment to any person/company/organisation with whom they have financial, family or personal interests. If such a relationship exists, the obligation rests with the individual to declare such a conflict to his/her line manager and for the manager to decide whether to withdraw from the process.

Any personnel that have a business relation such as board member, shareholder, or play other influential roles within a business that link directly with WWF's areas of work and/or corporate partners should report this to WWF upon employment or when the situation occurs and discuss with line manager as appropriate.

Corruption

Personnel shall not, in order to obtain or retain benefits, contracts or employment, offer, promise or give anything of value or an undue advantage to a public official or any third party to influence that person to act or refrain from acting in the relation to his/her duties.

Personnel shall not, in their conduct of work for WWF, request, accept or receive any improper advantage that may influence your decisions.

All personnel must observe the highest standards of honesty and integrity by not abusing their position for personal gain. Abuse of a position would include withholding goods that are due to WWF's programme participants, or awarding goods that are not due to programme participants in order to obtain benefits. It also includes accepting, soliciting, requesting or implying expectations of payment, gifts or sexual favours in exchange for awarding benefits, contracts or employment.

Any such abuses will be considered acts of gross misconduct and will result in dismissal



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Personnel should conduct themselves at all times in a manner that avoids suspicion of such behaviour and adhere to the WWF-Norway 'Fraud/Corruption Prevention and Investigation Policy'.

Gifts, hospitality and expenses

Personnel must not, directly or indirectly, accept gifts except for promotional items of minimal value. Other gifts may be accepted in situations where it would clearly give offence to refuse, in which case the gift must be handed over immediately to WWF and will be regarded as WWF property.

Hospitality such as social events, meals or entertainment may be accepted if there is a clear business [or charity] reason. The cost of any hospitality must be kept within reasonable limits.

The above principles also apply in the reverse direction, so that no personnel acting on behalf of WWF may, in their dealings with partners, offer or agree to pay for gifts, hospitality or other expenses that would violate these principles.

Rules and policy for remuneration when personnel are giving presentations, lectures, articles and opinion pieces is put down in annex 3 of WWF-Norway fraud and Corruption policy.

Charitable donations

Charitable donations and other income enable WWF to undertake its national and global conservation work to achieve a world in which people live in harmony with nature. Secure and diverse funding enables WWF to maintain its independence, protect its reputation and operate effectively. Funding may be unrestricted or in certain circumstances directed to specific projects or programs.

WWF must not risk jeopardising its reputation for honesty, independence, integrity and professionalism by accepting donations and other gifts. WWF must ensure that the givers' decision to give donations or gifts is approved properly, that all donations and other income are properly recorded in the accounts and that a consistent application of policies and procedures apply when accepting donations and gifts.

Intoxicants

WWF is a drug-free workplace. Accordingly, it is not permitted, and is a disciplinary offence, to be under the influence of intoxicating substances, while at work for WWF. The same applies for being in possession of, distributing or selling illegal substances, while at work for WWF.

Limited amounts of alcohol, however, may be served when local custom and occasion makes it appropriate to do so, and provided that the consumption will not be combined with driving or any other activity that makes it incompatible with the use of alcohol.

Harassment, exploitation and abuse

WWF recognises that all personnel and programme participants have a right to be treated with dignity and respect. Therefore, any proven instances of harassment, exploitation or abuse will be treated as gross misconduct and, as such, will result in appropriate disciplinary action being taken, up to and including dismissal. This includes also buying of sex while on duty and travelling as a WWF representative.



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WWF is against purchase of sexual services. Purchase of sexual services may support human trafficking. Human trafficking is illegal and a violation of human rights. WWF personnel must refrain from buying sexual services when on assignments or business trips for WWF.

Sexual relationships or other exploitation of children are strictly forbidden.

Sexual activity between a WWF personnel member and a child¹ (a person under the age of 18) is illegal according to Norwegian law and is not condoned. Mistaken belief in the age of a child is no defence.

Relationships with programme participants

Sexual relationship between personnel and programme participants are strongly discouraged since they are most likely to be based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work. All personnel should exercise discretion, professionalism and good judgment when there is a relationship between WWF personnel and programme participants.

Compliance with local law and culture

WWF personnel must always comply with applicable laws and regulation while on assignments or business trips for WWF. This includes situations related to sexual relationships. WWF personnel must not behave in a manner that can offend local customs or culture. If issues of human rights abuses and any related concerns are observed it is your duty to report to management upon return to the office.

Protection and use of WWF assets and services

It is the responsibility of all WWF personnel to safeguard the property and assets of WWF. All assets shall be used and maintained with care and respect while guarding against waste and abuse.

The WWF personnel's use of information, IT systems and internet services must be governed by the needs of WWFs activities and not by personal interests. Information produced and stored on WWFs IT-system is regarded as WWFs property. WWF therefore reserves the right to access all such information except where limited by law or agreement.

WWF personnel are responsible for maintaining electronic files and archives in an orderly manner. Private use is only permitted for the processing of ordinary information to a limited extent. Information that may be considered illegal, offensive or inappropriate must under no circumstances be processed, downloaded, stored or disseminated. Any downloading, storing or disseminating in breach of any copyright law or provision is prohibited. Any use of software in breach of any copyright law or provision is prohibited.

Duty to report

It is the duty of all personnel who become aware of any possible breaches of this Code to report this immediately to a line manager, either through the established reporting mechanism or, if not appropriate, to another senior member of personnel, the employee representative or Board member. Personnel must ensure that all information about breaches of this Code is handled with

¹ The exception being where a personnel member is legally married to a person under the age of 18. Refer to the definition of 'child' in attached terminology.



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the utmost discretion. Line managers, staff or Board members approached with information about possible breaches of this Code have a duty to act upon it and inform the person reporting what steps will be taken to deal with the matter. Personnel are referred to the WWF-Norway guideline for whistle-blowing for advice on this.

Review

WWF recognises that both internal and external environments change. Such change may have a bearing on the scope and content of this policy. Consequently, it will be reviewed periodically. The review process will be consultative and participatory in nature. The responsibility for initiating the policy review process rests with WWF's Senior Management and Board.

Any breach of this Code will result in disciplinary action up to and including dismissal.



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I have read and familiarized myself with the content of WWF-Norway Code of Ethics, WWF-Norway Code of Conduct and procedures for whistle blowing in WWF-Norway. I am also aware that severe breach of WWF-Norway Code of Ethics, WWF-Norway Code of Conduct and procedures for whistle blowing may lead to disciplinary action, up to and including dismissal.

Date and signature

WWF personnel (name)

Signature

Date



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Clarification of terminology

Clear definitions are essential to ensure that the proper reporting of, and responses to instances of abuse or exploitation can be handled in a consistent manner. Discussing definitions of inappropriate behaviour with personnel and programme participants should be included in workshops and inductions around the new Code of Conduct.

The following provides WWF's definitions of the terminology used in this Policy and the Code. However, personnel are also bound by the local laws of the countries in which they work.

Visitor: For the purpose of this policy, a 'visitor to WWF' is any individual who visit WWF's overseas programmes and comes into contact with WWF's programme participants. This includes journalists, consultants, donors, friends, spouses, partners, family members and relatives of current WWF personnel, etc. The definition shall not include individuals who call to WWF's offices for short meetings.

Child: The Convention on the Rights of the Child defines as children *every human beings under the age of eighteen years unless under the law applicable to the child, majority is attained earlier* ([Article 1](#)). The Convention emphasizes that States substituting an earlier age for specific purposes must do so in the context of the Convention's guiding principles – of non-discrimination ([Article 2](#)), the best interests of the child ([Article 3](#)), maximum survival and development ([Article 6](#)) and participation of children ([Article 12](#)).

Bullying: Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individual's right to dignity. An isolated incident of the behaviour described in this definition may be an affront to dignity at work but, as a once off incident, it is not considered to be bullying, nor is the exercise of legitimate management rights or of legitimate employer rights and responsibilities.

Examples of bullying are as follows:

- Manipulation of the victim's reputation by rumour, gossip or ridicule.
- Preventing the victim from speaking by making loud voiced criticisms or obscenities.
- Social exclusion or isolation.
- Manipulating the nature of the work or the ability of the victim to perform the work e.g. by overloading, withholding information or setting meaningless tasks.
- Physical abuse, or threats of abuse.

Harassment: Harassment is any act or conduct including spoken words, gestures or the production, display or circulation of written words, pictures or other material, if the action or conduct is unwelcome to the recipient and could reasonably be regarded as offensive, humiliating or intimidating.

Examples of harassment include:

- verbal harassment, jokes, comments, ridicule, or songs
- physical harassment including jostling, shoving, or any form of assault;
- intimidatory harassment including gestures, posturing, or threatening poses;



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- visual display such as posters, emblems, or badges;
- isolation or exclusion from social activities;
- pressure to behave in a manner that the personnel or programme participant thinks is inappropriate - for example, being required to dress in a manner unsuited to a person's ethnic or religious background.

Sexual Harassment: Sexual harassment is defined as any:

- Act of physical intimacy
- Request for sexual favours
- Other act or conduct including spoken words, gestures, or the production, display or circulation of written words, pictures or other material that is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating.

Examples of sexual harassment can include:

- *Verbal abuse:* requests or demands for sexual favours, suggestive remarks, degrading abuse or insults, jokes or tricks of a sexual nature.
- *Physical abuse:* gesturing of a sexual nature, unnecessary touching, indecent exposure, and assault.
- *Visual abuse:* displaying/circulating pornographic materials.

A single incident may constitute sexual harassment. Sexual harassment can be imposed by either sex upon the other, and can include harassment of a person due to sexual orientation or preferences. Instances of sexual harassment will be treated as gross misconduct and may result in dismissal.

Gender-Based Violence: Physical, mental, or social abuse that is directed against a person because of his or her gender or gender role in a society or culture. In these cases, a person has no choice to refuse or pursue other options without severe social, physical, or psychological consequences. Use this category for sexual violence cases that do not fit into any of the other four categories.

Rape: Guilt of rape is defined according to the Norwegian penal code § 192 to: Any person who

- a. engages in sexual activity by means of violence or threats, or
- b. engages in sexual activity with any person who is unconscious or incapable for any other reason of resisting the act, or
- c. by means of violence or threats compels any person to engage in sexual activity with another person, or to carry out similar acts with himself or herself

Exploitation: Exploitation is using one's position of authority, influence or control over resources, to pressure, force or manipulate someone to do something against their will. This includes threatening to withhold project assistance, threatening to make false claims about a person in public, or any other negative repercussions in the work place or community.

Examples of exploitation can include:

- Offering special benefits to programme participants or personnel in exchange for expressed, implied or demanded (sexual) favours.



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- Threats or insinuations that an individual's refusal or unwillingness to submit to demands will affect the person's entitlement to project assistance and support, or terms and conditions of employment.

Violence: Violence constitutes incidents where persons are abused, threatened or assaulted in circumstances related to their work, involving an explicit or implicit challenge to their safety, health or well being.

Intimidation or Victimization: Recipients will be protected against intimidation, victimisation or discrimination resulting from their alleging harassment or assistance with an investigation. If any member of personnel is found retaliating against a recipient making a complaint or assisting in an investigation, then the appropriate disciplinary action - up to and including dismissal - will be imposed.