



WWF-NORWAY CODE OF ETHICS AND CONDUCT

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INTRODUCTION

This Code of Ethics and Conduct is for all employees, volunteers, interns, board members etc (“personnel”) at WWF-Norway. It outlines our common set of ethical values and how personnel are expected to behave. Any breach of this Code will result in disciplinary action up to and including dismissal.

All personnel will confirm by signature that they have read this Code when they join WWF and reconfirm on an annual basis.

BEFORE YOU START READING

Does this code explain all the standards you need to know?

This Code is a compilation of our existing policies and is intended as a user-friendly overview. For details, we refer to the relevant policies. This document is not exhaustive.

What about different laws and standards in different countries?

This document is in line with Norwegian law and WWF Network standards. Hosted personnel or those travelling must also comply with the rules of the host office. If the local law or a local WWF office requires higher standards than those in this Code, we apply these higher standards. 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 line managers have special obligations?

Yes. Line managers must ensure team members are aware of and understand this Code of Conduct. Line managers shall display 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 about how to act?

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

- Is my action legal, honest, ethical, in line with WWF-Norway’s and the WWF Network’s 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, my family, my co-workers, our donors, knew about it?

For help, start with your line manager or the Director of People & Culture.

OUR MISSION, ETHICS AND VALUES

WWF-Norway will always 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 seeks to advance our mission – to build a future in which people live in harmony with nature – on the fundamental principle that positive outcomes for both people and nature depend on firmly anchoring and integrating human rights into conservation practices. WWF strives to ensure that as a minimum, our place-based and policy actions do no harm to people, particularly marginalised groups, but ideally, adds value to those who live with and depend upon nature.

All our work is guided by our WWF Network Core Standards which are considered an integral element of this document.

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. We will always ensure that we are transparent and accountable in all aspects of our work and engagement with others.

We adhere to the WWF values of:

- **Courage:** We demonstrate courage through our actions, we work for change where it's needed, and we inspire people and institutions to tackle the greatest threats to nature and the future of the planet, which is our home.
- **Integrity:** We live the principles we call on others to meet. We act with integrity, accountability, and transparency, and we rely on facts and science to guide us and to ensure we learn and evolve.
- **Respect:** We honour the voices and knowledge of the people and communities that we serve, and we work to secure their rights to a sustainable future.
- **Collaboration:** We deliver impact at the scale of the challenges we face through the power of collective action and innovation.

HOW WE BEHAVE

Towards

Each other: We will always 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.

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, to learn from, and avoid repeating mistakes.

Marginalised groups, including Indigenous Peoples' and local communities, women: WWF recognizes that we have an important role to play in ensuring equity in our work and benefits and costs arising from it, and in respecting and promoting the realization of positive human rights outcomes. Moreover, WWF recognizes Indigenous Peoples and local communities not only as rights holders but also essential partners for successful and inclusive conservation efforts.

Governments: We strive to cooperate with government authorities, as formally mandated institutions responsible for governance, supporting implementation of relevant policies where applicable, while maintaining our independence and defend our point of view, including when this is opposed to government policies and practices. In cases where governments contravene environmental laws and undermines related human rights, we will advocate strongly to counter these and ensure that our work does not directly or indirectly support those abuses.

Other organizations: WWF-Norway seeks to partner with other civil society organisations working on similar or aligned issues, and where requested, supports their institutional strengthening to enable them to advocate for their own needs and priorities. At the same time, we maintain our independence and vigorously defend our point of view. We will always share credit with our partner organizations, be they strategic, funding or implementing partners.

Media and opinion influencers: We will work constructively with the media and opinion influencers to share our messages and 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 to support any political, ethnic or religious viewpoints with which we disagree.

Corporate partners: 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. We will ensure that any partnerships we have do not condone or enable greenwashing or undermining of peoples' rights.

Suppliers and consultants: In selecting outside, independent resources, we will always be fair, objective and open-minded in our assessment of their abilities and apply our purchase policy. 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.

Our institution: We will always 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.

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.

We 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.

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 always adhered to.

Discrimination

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-Norway upon employment or when the situation occurs and discuss with line manager as appropriate.

Fraud/Corruption

Personnel shall not, 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 them - 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

Personnel should always conduct themselves in a manner that avoids suspicion of such behaviour and adhere to the **WWF-Norway Fraud/Corruption Prevention and Response 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-Norway and will be regarded as WWF-Norway's 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 **WWF-Norway's Policy for gifts and compensation from third parties** as annex to the WWF-Norway Fraud/Corruption Prevention and Response 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 suspected incidents of harassment, exploitation or abuse will be investigated, and 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.

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 child is not condoned. The UN Convention on the Rights of the Child defines a "child" as a person below the age of 18, unless the relevant laws recognize an earlier age of majority. The Age of Consent in Norway is 16 years old. The age of consent is the minimum age at which an individual is considered legally old enough to consent to participation in sexual activity. When travelling, WWF-Norway personnel must follow local law, but always the Norwegian law, whichever has the higher Age of Consent. 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, drugs and alcohol, clothing and behaviour. 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. If a WWF employee is not comfortable visiting a country where compliance with their laws is an affront to their values, they do not have to travel there.

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 were 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

WWF is committed to a SpeakUp! culture (WWF-Network standard SpeakUp!) which allows people (whether WWF employees or anyone else) to safely raise concerns of inappropriate conduct by employees of WWF, its partners and people associated with WWF, without fear of retaliation. Any employee who engages in retaliation may be subject to disciplinary proceedings.

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 are referred to the **WWF-Norway whistle-blowing procedure** (Annex 1). Personnel must ensure that all information about breaches of this Code is handled with 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.

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.

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: To this policy, a 'visitor to WWF' is any individual who visit WWF's overseas programmes and meets 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.

Programme participant: Any person involved in or influenced by a programme in which WWF-Norway has any kind of influence.

Child: The Convention on the Rights of the Child defines as children every human being 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 includes conduct, where repeated or occurring as part of a pattern of behaviour that includes physical assault of any kind, threats of harm, and/or physical harassment or intimidation. 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, unreciprocated, uninvited and usually repeated and could reasonably be regarded as offensive, humiliating or intimidating. It includes misconduct or abuse of power that interferes with another's ability to perform his/her/their work.

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.
- 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 any physical, visual, verbal or non-verbal conduct or communication of a sexual nature which is unwelcome and non-consensual:

Examples of sexual harassment 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 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/her/their 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.

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

- engages in sexual activity by means of violence or threats, or
- engages in sexual activity with any person who is unconscious or incapable for any other reason of resisting the act, or
- 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 workplace or community.

Examples of exploitation include:

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

ANNEX 1

WWF-NORWAY WHISTLEBLOWING PROCEDURE

What is whistle-blowing?

- To be a whistle-blower is to speak up about possible misconduct in the workplace. This includes, among other things, acts of criminal nature, other crimes and violations of the organisation's internal rules and / or ethical guidelines. The right to warn is regulated in arbeidsmiljøloven § 2-4 (see details at the end of this document)
- Is it safe to blow the whistle? Retaliation against any employee who has blown the whistle in accordance with Arbeidsmiljøloven § 2-4 is prohibited. Any employee who engages in retaliation may be subject to disciplinary proceedings.

Why is whistle-blowing necessary?

- By getting information about possible misconduct in the organisation, the employer can clear up and improve the situation.
- This will ensure that crimes and other misconduct will be avoided in the organisation, which can create a better working environment.
- Your information can help the organisation achieve this.

Who should you blow the whistle to?

- You can always notify your immediate supervisor, and other persons in the Senior Management Team.
- You can also notify the union representative (tillitsvalgt), the safety representative (verneombud) or Working Environment Committee (arbeidsmiljøutvalg), which in turn will take the inquiry to the appropriate person/organisation.
- If the information in any specific case involves the leaders in the organisation, and / or you lack any response from the first given notification, please contact the chairman of the board using the contact details on wwf.no.
- Alternatively, employees and third parties can report to [Ethics Reporting Hotline](#) any concern relating to internal WWF issues including, but not limited to fraud, corruption, sexual harassment, other workplace misconduct and health & safety concern. Office reporting and 3rd party concerns should also be reported through this channel. Be aware you can choose to remain anonymous throughout the whistle blowing process.
- You always have the right to notify the relevant matters to public authorities such as Arbeidstilsynet, Økokrim and Konkurransetilsynet, but it is desirable that the warning first be given internally.

In which ways can you blow the whistle?

- There are no requirements to the format of the notification. You can notify in writing, or orally.
- Oral notification can be given by phone or directly to one of those listed above.
- Written notification can be given by letter, e-mail, SMS or through the WhistleB channel
- Notification can be made anonymously, but it is desirable that you provide your identity for the organisation to investigate as thoroughly as possible. This also ensures the best possible result.
- The whistle-blowers name shall be held confidential, only known for the person(s) in charge of handling the case.
- You do not need firm evidence to raise a concern. However, reckless or deliberate reporting of false information is forbidden and may result in disciplinary action.

Follow-up of an alert

- Confidentiality, ability and contradiction are the basic principles how WWF Norway will follow up on an alert. This apply both for the re-notified and the whistle blower.
- WWF-Norway will ensure investigation based on the principle of contraction meaning the re-notified will have the ability to get information about the accusation and give his/her response before any conclusion.
- If the company knows who the whistle-blower is, he/she should always receive feedback as soon as possible about how the issue is being processed.
- As far as possible, he/she should also get feedback on the outcome of the issue. In the case that no misconduct is revealed during the investigation, he/she will also receive feedback about this.
- If the whistle-blower wants to raise further concerns about the way their concern has been handled, this should be done through one of the alternative reporting channels than the one first used.
- The whistle-blower is protected from retaliation because of the notification given. This is regulated in arbeidsmiljøloven § 2-5. Should he/she experience any form of retaliation, he/she should immediately inform the CEO, Director of People & Culture or the chairperson of the WWF-Norway board.
- It is the Director of People & Culture's responsibility to ensure allegations is appropriately and promptly investigated in accordance with this policy and with WWF's Response plan for whistleblowing, complaints and fraud/corruption concerns.

See more information from "Arbeidstilsynet" about procedures related to whistle blowing [Slik bør arbeidsgiver håndtere varsling](#)

These are extracts from Norwegian law most relevant for whistleblowing:

Arbeidsmiljølovens § 2-4. Varsling om kritikkverdige forhold i virksomheten

- (1) Arbeidstaker har rett til å varsle om kritikkverdige forhold i virksomheten.
- (2) Arbeidstakers fremgangsmåte ved varslingen skal være forsvarlig. Arbeidstaker har uansett rett til å varsle i samsvar med varslingsplikt eller virksomhetens rutiner for varsling. Det samme gjelder varsling til tilsynsmyndigheter eller andre offentlige myndigheter.
- (3) Arbeidsgiver har bevisbyrden for at varsling har skjedd i strid med denne bestemmelsen.

Health and Safety at Work Act §2-4 Whistle blowing in the enterprise

- (1) The employee has the right to blow the whistle on misconduct in the enterprise
- (2) The employee shall follow an appropriate procedure in connection with such notification. The employee has notwithstanding the right to notify in accordance with the duty to notify or the undertaking's routines for notification. The same applies to notification to supervisory authorities or other public authorities.
- (3) The employer has the burden of proof that whistle-blowing has been made in breach of this provision.

Arbeidsmiljøloven § 2-5. Vern mot gjengjeldelse ved varsling

- (1) Gjengjeldelse mot arbeidstaker som varsler i samsvar med § 2-4 er forbudt. Dersom arbeidstaker fremlegger opplysninger som gir grunn til å tro at det har funnet sted gjengjeldelse i strid med første punktum, skal det legges til grunn at slik gjengjeldelse har funnet sted hvis ikke arbeidsgiveren sannsynliggjør noe annet.
- (2) Første ledd gjelder tilsvarende ved gjengjeldelse mot arbeidstaker som gir til kjenne at retten til å varsle etter § 2-4 vil bli brukt, for eksempel ved å fremskaffe opplysninger.
- (3) Den som er blitt utsatt for gjengjeldelse i strid med første eller andre ledd, kan kreve oppreisning uten hensyn til arbeidsgivers skyld. Oppreisningen fastsettes til det beløp som retten finner rimelig under hensyn til partenes forhold og omstendighetene for øvrig. Erstatning for økonomisk tap kan kreves etter alminnelige regler.

Health and Safety at Work Act §2-5 Protection from retaliation after whistle-blowing

- (1) Retaliation against any employee who has blown the whistle in accordance with §2-4 is prohibited. If the employee puts forward information that gives reason to believe that retaliation in defiance of first sentence, it will be taken for basis that such retaliation has occurred unless the employer substantiates otherwise.
- (2) Regulation 1 applies corresponding to retaliation against any employee who makes known that the right to blow the whistle according to §2-4 will be exercised, i.e. by providing information.
- (3) He/she who has been exposed to retaliation in defiance of regulation 1 or 2, can claim damages for non-economic loss without considering the employer's fault. The damage for non-economic loss will be determined to the amount the court of law finds reasonable regarding the parties' conditions and the circumstances incidentally. Compensation for financial loss can be claimed according to ordinary regulations.

ANNEX 2

WWF-NORWAY RESPONSE PLAN FOR WHISTLEBLOWING, COMPLAINTS AND FRAUD/CORRUPTION CONCERNS

WWF is committed to conducting our organisation with honesty and integrity, and we expect all personnel to maintain high standards in accordance with our values and Network core standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

WWF is committed to responding to concerns about illegal or unethical conduct by WWF personnel and associated third parties, and to addressing negative impacts of WWF activities. Each response depends on the context and the content of the complaint itself.

All alerts and complaints shall be managed by WWF-Norway as soon as possible after receipt. A first assessment will be made to establish the nature and scale of the case. The responsibility for the investigation is based on whether the alert/complaint pertains to issues relating to WWF-Norway staff, or partners and their sub-partners. While the former shall be handled according to this response plan, the latter will be handled according to donor requirements and the procedures outlined in the International Programme Guide, see [WWF Norway Procedures for handling of alerts and complaints - International programming](#)

Nonetheless, the following shall apply:

- Anyone who receives a notification/concern shall report to the Director of People & Culture immediately.
- If the Director of People & Culture is alleged to be involved in the notification/concern, the notification/concern shall be reported to the CEO.
- The Director of People & Culture and the CEO shall decide how to respond to the complaint, including decide whether an investigation is necessary.
- Notify the appropriate Global Reporting Channel as soon as possible and within 24 hours, if the Office receives a complaint which it considers could seriously damage WWF's reputation.
- With the PSP (Public Sector Partnership) Lead agree any need to inform donors.
- Consider informing the chairman of the board.
- Report matters to Regulators in accordance with local laws as applicable.
- A response to the notification/concern shall be timely and professional and in accordance with all applicable laws and regulations and be based on initial gathering of information about the scope of the notification/concern.
- A response shall be impartial, fair and independent in fact finding, investigation, mediation or dialogue. In some cases, we will need to appoint an investigator, team of investigators or independent mediator. The following elements shall be considered:
 - Developing ToR for an investigation.
 - Appointing individuals (internal or external) to undertake the review/investigation.
 - Drafting report and sharing for review/input.
 - Finalise report.
 - Act as necessary, such as disciplinary, improving systems, etc.
 - If not anonymous, the complainant shall be informed about the process, and if possible, about the outcome, in line with applicable legislation.
 - All sensitive information is to be protected and secured, personal data of complainants, victims, witnesses and accused.
 - All complaints are to be recorded together with the office's response to them, in line with national auditing and retention policies, and legislation including on data protection.

ETHICS FOR IMPACT



Vi jobber for å stanse
naturødeleggelser og skape en
framtid der mennesker lever
i harmoni med naturen.
sammen for naturen wwf.no

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