



CONFLICT OF INTEREST POLICY & DISCLOSURE FORM

1. PURPOSE

To ensure 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.

2. POLICY

- 2.1. Board members and staff with a potential conflict of interest must make disclosure of the situation and all relevant facts to the President of the Board (Board members) and Chief Executive Officer (staff members) at the earliest possible opportunity and well before any decisions are made or expected regarding the particular situation that raises conflicts or concerns. Staff should consult their managers when preparing the disclosure briefing documents for the CEO's review.
- 2.2. In addition to the ongoing obligations of all staff members to disclose potential conflict situations to the President or CEO, Board members and staff are required to complete a "Conflict of Interest Disclosure form" on an annual basis, a copy of which forms Annex 1 of this policy.
- 2.3. Annual disclosure of relationships and potential conflicts does not relieve staff from the obligation to raise a potential conflict when it arises. When a change in circumstances arises during employment that might trigger a conflict of interest, Board members and staff must immediately inform their manager, the People and Culture Director and the CEO of the potential conflict of interest.
- 2.4. Board members and 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 organisation. 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.
- 2.5. Staff will familiarise themselves with the organisation's detailed policies and procedures and ensure that they are implemented. All WWF-Australia policies and procedures are available to all staff on Wiki Habitat Policies and Procedures [here](#).
- 2.6. Staff have the right to use the organisations' information system services in work that is directly related to their position. The use of network and email services for personal purposes is permitted to a reasonable extent.
- 2.7. The use of WWF's network and email services for illegal, commercial or political purposes is forbidden.
- 2.8. Photos, videos and written material related to WWF's work produced while being employed by WWF must be made available to the WWF Network, without any further payment of compensation, for use during and after the term of employment in accordance with the signed contract of employment.
- 2.9. Failure to disclose a conflict of interest may result in disciplinary action and may ultimately jeopardise the staff member's employment with WWF-Australia.

3. SOURCES OF AUTHORITY

Federal Legislation

- *Criminal Code Act 1995 – (Corruption, Section 70)*
- *Criminal Code Amendment (Theft, Fraud, Bribery & Related Offences) Act 2000*



- *Commonwealth Fraud Control Guidelines – 2011*
- *Commonwealth Fraud Control Framework- 2017*
- *Competition and Consumer Act 2010 (Australian Consumer Law)*
- *Corporations Act 2001 (if partnering with the private sector)*
- *Public Service Act 1999 (if partnering with government)*
- *Freedom of Information Act 1982 and related amendments*
- *Financial Management and Accountability Act 1997*

State Legislation

ACT

- *Criminal Code (Theft, Fraud, Bribery & Related Offences) Amendment Bill 2003*

NSW

- *Crimes Amendment (Fraud, Identity and Forgery Offences) Act 2009 No 99*
- *Crimes Act 1900 (Fraud, Part 4AA, Sect 192E)*
- *Independent Commission Against Corruption Act 1988*

NT

- *NT Criminal Code Act 1983 and Amendment Bill 2013*

QLD

- *Criminal Code Act 1899 (Qld.)*
- *Public Service Act 2008 (if partnering with QLD government)*

SA

- *Criminal Law Consolidation Act 135 (SA)*

TAS

- *Criminal Code Act 1924*

VIC

- *Crimes Act 1958 (Vic.)*

WA

- *Criminal Code Act 1913*

WWF

- *WWF Australia Code of Ethical Conduct*

DFAT

- *DFAT Risk Management Framework*
- *DFAT Fraud Policy Statement*
- *Fraud & Anti-Corruption Guidance for DFAT Partners (June 2016)*



Australian Council for International Development

- *ACFID Code of Conduct*
 - *Principle 7- Commitment 4 (Conflict of interest management)*
 - *Principle 8 - Commitment 2 (Resources & funds management)*

Other resources

- *United Nations Convention against Corruption (UNCAC) - 2005*
- *Australian Government Fraud control training and fraud control competency standards*
- *Independent Commission Against Corruption, NSW*

4. OBJECTIVES

- 4.1 To prevent conflicts of interest by ensuring Board members and staff are provided with access to information and a mechanism to disclose potential conflicts.

5. SCOPE

- 5.1 This policy applies to all WWF-Australia Board members, and staff at all workplaces.

6. DEFINITIONS

Conflict of Interest

There is a potential conflict in any situation in which questions might be raised about 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 to gain favour for an individual associated with WWF, her or his family, or organisations related to such persons.

The following are examples that would present potential conflicts of interest:

- A department is evaluating a proposal from a consultant who has a close relative on WWF's 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 organisation or an advisory committee of a corporate partner
- An employee who volunteers for another organisation is asked by that organisation to fundraise
- An employee receives non-monetary gifts from a third party above a reasonable value (e.g. no more than \$50) unless made available to the whole team, or placed in a common area, or contributed to a common pool of prizes or gifts such as during end of year celebrations etc.
- A vendor offers a staff member free merchandise in exchange for continuing business
- An employee takes on paid work for another organisation, or receives payment as a consultant
- An employee is 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 impels WWF support of the activity
- An employee's partner works for WWF



These are only a few examples that illustrate the concept of possible conflict of interest. In each instance, the situation needs to be disclosed and reviewed in advance.

7. RESPONSIBILITIES

7.1 Executive Management is responsible for:

- Ensuring that the Conflict of Interest Policy and associated policies are communicated to all managers and staff and implemented in full, and the "Conflict of Interest Disclosure Form" is completed annually by every staff member
- Providing managers and staff with the necessary training to comply with their obligations
- Ensuring WWF-Australia Board members, all managers, staff, volunteers and interns comply with all relevant legislation and WWF-Australia policies.

7.2. People & Culture are responsible for:

- Ensuring that managers and staff members have access to WWF-Australia policies (including this one)
- Assisting managers with the construction of appropriate training and development programs
- Providing Executive Management, managers and employees with support and assistance as required to ensure communication of, and compliance with, the Conflict of Interest Policy and associated policies
- Supporting managers with the annual "Conflict of Interest Disclosure form" sign off
- Maintaining completed Conflict of Interest Disclosure forms in staff members' personal files.

7.3. People managers are responsible for:

- Ensuring that their team members fully understand conflict of interest and how it may apply to their individual situations
- Ensuring that their team members complete the "Conflict of Interest Disclosure form" annually on the due date and return copies to People and Culture for secure storage
- Be alert to the possibility that the situations of staff members may change and may require disclosure of a potential conflict of interest outside the annual sign off period
- Provide People and Culture (P&C) with information that relates to Conflict of Interest and associated policies and procedures
- Seeking early support and assistance from P&C.

7.4. All staff members, volunteers and interns are responsible for:

- Working strictly in accordance with WWF policies (including this one) and the Code of Ethical Conduct and I-KODE Values
- Completing the "Conflict of Interest Disclosure form" at least annually at the required time and/or immediately they become aware of a potential conflict of interest.

8. PROCEDURES

- 8.1.** Staff with a potential conflict of interest must make disclosure of the situation and all relevant facts to their manager and P&C at the earliest possible opportunity (and well before any decision is made or expected regarding the particular situation that raises a concern about the conflict).
- 8.2.** In addition to the ongoing obligations of all staff members to disclose potential conflict situations, all staff must sign the "Conflict of Interest Disclosure form" annually at a date to be



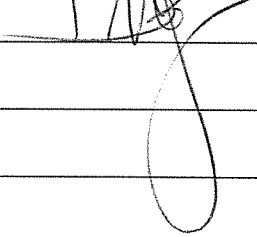
announced by WWF.

8.3. Failure to notify WWF of a potential conflict of interest may result in disciplinary action which may ultimately jeopardise continued employment.

9. CONFIDENTIALITY AND DOCUMENT CONTROL

9.1. This policy is available on Wiki Habitat for all employees.

10. APPROVAL

Name: Dermot O’Gorman 

Title: CEO

Date of Issue: 15 August 2012

Revised: 17/04/2018



Annex 1

CONFLICT OF INTEREST DISCLOSURE 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

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 document.

Signature

POTENTIAL CONFLICT

REASON FOR CONFLICT

POTENTIAL CONFLICT	REASON FOR CONFLICT
<i>For example: My partner is the CEO of a local NGO</i>	<i>The NGO receives occasional contracts from WWF</i>

Note: If more space is required for a declaration please attach as a separate document.