



WWF-UK GIFTS AND HOSPITALITY POLICY

EXTERNAL

1. Policy Statement

WWF-UK has a zero tolerance approach to bribery and is committed to operating in a fair, open and honest way in line with our value of Integrity. WWF-UK will never give or receive a gift or benefit that is intended to influence another person's decision-making or could be reasonably judged to do so.

2. Definitions

Gift: any benefit given or offered free of charge to an individual, such as money, vouchers, discounts, tickets and physical items or “in kind” services. Gifts include gifts from individuals and corporate organisations, including suppliers and corporate partners. Gifts are to be distinguished from ‘in-kind donations’ which are donations of goods and services free of charge to the charity for use to further its charitable purposes but not for the benefit of a specific individual.

Hospitality: includes any form of food, drink, accommodation, entertainment and events, including award ceremonies, invitations to sporting events or concerts

3. Policy

WWF-UK does not operate in an environment where the giving and receiving of gifts and hospitality is expected and donors, including the public, do not expect their money to be spent unnecessarily or decisions to be influenced by this. It can seriously damage WWF-UK’s reputation if there is any appearance of impropriety or where WWF-UK could reasonably be thought to have been influenced in making a business decision by offering or receiving inappropriate gifts and hospitality.

This policy helps ensure all parties do not breach the Bribery Act 2010 and WWF-UK funds are spent for the purposes they were provided for. There are some legitimate circumstances in the course of our work where gifts or hospitality are acceptable and these are outlined in this policy. A good rule to judge whether to accept a gift or hospitality is to ask yourself how would it look if it were to become public knowledge.

4. WWF-UK limits on gifts & hospitality

- If determined a gift will not influence decision making:
 - gifts given to or offered by WWF-UK below £10 can be given or accepted without declaration
 - gifts given to or offered by WWF-UK between £10 and £25 must be approved **in advance** by a manager
 - gifts above £25 cannot be accepted or given.
- Gifts of cash or cash equivalent will never be accepted.
- Given the high risk of perceived bribery, gift giving to and from government officials is **not allowed** in any circumstances.
- If determined they will not influence decision making:
 - hospitality below £25 can be accepted or given without declaration
 - hospitality between £25 and £50 must be approved **in advance** by a manager
 - hospitality above £50 must be approved in advance by the WWF-UK General Counsel.
- Limits apply to gifts or hospitality provided at one time. An individual cannot accept gifts or hospitality from anyone more than twice a year.
- All gifts above £10 and hospitality above £25 must be reported to the WWF-UK General Counsel for recording in the gifts and hospitality register whether accepted or not.

5. Application to third parties

Suppliers, contractors, grantees and corporate partners are asked to adhere to the above limits in the course of their business with WWF-UK and not to make gifts or offer hospitality to WWF-UK staff or to any third parties on behalf of WWF-UK which exceed these limits. They are also requested to refrain from offering any gifts or hospitality at a time when WWF-UK may be making a decision whether to start, stop or continue a commercial or financial relationship with them or any third party. Such offers will be refused.