

## Anti-Bribery and Anti-Corruption Policy

### Policy Overview

Cercarbono is committed to maintaining the highest standards of ethics and integrity in all aspects of our operations. This Policy outlines our commitment to preventing bribery, corruption, and unethical conduct. It serves as a guide for all Cercarbono Personnel—including employees, contractors, and third-party representatives—on how to uphold these principles and ensure our business dealings are conducted with integrity.

### Scope and Applicability

This policy applies to all Cercarbono Personnel, including employees, officers, directors, and contractors. It also extends to third-party representatives such as consultants, service providers, and any individuals or entities acting on behalf of Cercarbono. All personnel and third parties must comply with this policy as part of their contractual obligations.

### Definitions

- **Bribery and Corruption:** The act of offering, giving, receiving, or soliciting anything of value to influence business decisions or gain an unfair advantage. This includes but is not limited to cash payments, gifts, or favours.
- **Anything of Value:** Refers to cash, gifts, services, or other benefits that could influence business decisions or create an obligation.
- **Public Official:** Includes government officials, employees of state-owned enterprises, and members of international organizations, regardless of their position or authority.
- **Third-Party Representative:** Refers to individuals or entities engaged to act on behalf of Cercarbono, including consultants, contractors, and agents.

### Key Principles

- **Prohibition of Bribery:** Cercarbono maintains a zero-tolerance policy towards bribery and corruption. Direct or indirect payments intended to secure an unfair business advantage are strictly prohibited. All transactions must be conducted transparently and in compliance with legal and regulatory requirements.
- **Gifts and Hospitality:** Gifts and hospitality may be offered or accepted if they are reasonable in nature, customary in business practices, and provided for legitimate business purposes. Routine business courtesies, such as attending client dinners, cocktail events, or similar functions, do not require reporting unless there is a potential conflict of interest, or the hospitality is extraordinary in value. The intention behind gifts and hospitality should never be to influence business decisions or gain an improper

advantage. Documentation and reporting are required only for substantial gifts or hospitality that could be perceived as creating an obligation.

- **Funding and Support:** Any financial support or resources provided to third parties must be legitimate, properly documented, and aligned with Cercarbono's ethical standards. This includes contributions to non-profit organizations, sponsorships, or other forms of support. Such support should be used to further legitimate business objectives or corporate social responsibility goals and should not be intended to secure undue advantage.
- **Political Contributions and Lobbying:** Cercarbono does not engage in direct political contributions. However, Cercarbono may participate in lobbying activities through industry associations or other organizations to advocate for policies aligned with our mission and values. Such participation must be conducted in accordance with applicable laws and regulations and must be transparent. Cercarbono's resources will be used responsibly to support legitimate advocacy efforts, ensuring no undue influence is exerted on political processes.
- **Facilitation Payments:** Facilitation payments, which are unofficial payments made to expedite routine governmental actions, are strictly prohibited. All dealings with government officials and other entities must be conducted in a lawful and transparent manner.
- **Receiving Benefits:** Cercarbono Personnel and third-party representatives must avoid accepting substantial benefits from entities with whom we conduct business. Any accepted benefit must be modest, transparent, and appropriate, and must be reported to the relevant authorities within Cercarbono.
- **Conflict of Interest:** All Cercarbono Personnel and third-party representatives must avoid any situations that could lead to a conflict of interest, where personal or financial interests may influence their ability to act in the best interest of Cercarbono, and according to its principles. Detailed regulations and procedures for managing conflicts of interest are outlined in the Procedures of Cercarbono's Certification Programme.

## Reporting Mechanisms and Accountability

- **Grievance Mechanism:** Any concerns or allegations of policy violations should be reported through Cercarbono's Grievance Mechanism at [info@cercarbono.com](mailto:info@cercarbono.com). Reports will be reviewed impartially by an ad hoc committee to ensure a thorough investigation. Cercarbono is committed to addressing all concerns promptly and effectively.
- **No Retaliation:** Cercarbono fosters an environment where individuals feel secure in reporting unethical behavior. Retaliation against individuals who report concerns in good faith will not be tolerated. All reports will be handled with confidentiality and sensitivity.

## Recordkeeping and Documentation

All business transactions must be accurately documented and recorded to reflect their true nature. This includes maintaining clear and detailed records of any financial transactions, gifts, and hospitality. Proper recordkeeping ensures transparency, accountability, and compliance with applicable laws and regulations.

## Compliance and Monitoring

This policy will be communicated to all Cercarbono Personnel and third-party representatives. We will conduct regular training sessions to ensure understanding and adherence to this policy. Non-compliance will result in disciplinary action, up to and including termination of employment or contract.

## Review and Amendments

This policy will be reviewed on an annual basis or as necessary to ensure its effectiveness and relevance. Amendments will be made as needed to adapt to changing regulations, business practices, or organizational needs. All updates to this policy will be communicated to Cercarbono Personnel and third-party representatives.

## Contact Information

For questions regarding this policy or to report any potential violations, please contact us at [info@cercarbono.com](mailto:info@cercarbono.com). We are committed to providing guidance and addressing any concerns related to ethics and integrity. All inquiries will be handled with the utmost confidentiality and respect.

## Implementation

Cercarbono's CEO is responsible for the implementation of this policy and ensuring that all relevant personnel are informed and trained. Managers are expected to lead by example and promote a culture of ethical behavior within their teams. All Cercarbono Personnel are expected to familiarize themselves with this policy and adhere to its principles in all business dealings.

## Document History

Version	Date	Comments or changes
1.0	04.09.2024	Initial version.