



# Code of Ethics

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## 1 Purpose of the Code of Ethics

The Code of Ethics of BioCarbon Cert (hereinafter, “**BioCarbon**”, “**We**”, “**our**”, “**us**” or “**the Company**”) is built around the recognition that everything we do will be governed by integrity, honesty, transparency, quality and in full compliance with our compliance obligations. We do believe that respecting these values is critical to maintain our good reputation and success and that all our personnel from the governing body to our employees will be fully committed to the promotion and protection of our corporate values.

We are also aware of the importance of the role played by our corporate leaders, and we encourage them to lead by example and spread a culture of compliance, trust and accountability within the Company.

Since it was founded, the Company has been dedicated to the certification and registration of Greenhouse Gas Projects and to the promotion of biodiversity conservation actions. This Code of Ethics was developed based on the Company’s identity, the corporate values that form part of our ethical culture and other foundational documents such as the Corporative Governance and Organizational Briefing.

It is intended to provide practical guidance for handling many of the ethical issues our directors and employees may face in the discharge of their professional duties, and it shall govern the different relationships between **BioCarbon** and its stakeholders (clients, potential clients, employees, competitors, public administration, government officials, the media, society, shareholders, suppliers and all other persons or institutions with which the Company interacts).

## 2 Scope of application

This Code of Ethics applies to all the directors, employees, clients and any other natural or legal person who perform services on behalf of **BioCarbon** regardless of their location in the world, and they shall undertake in writing to abide by it.

Therefore, the obligation to comply with the different provisions of this Code of Ethics shall be expressly provided in the contracts with clients, with third parties performing services on **BioCarbon**’s behalf and in employment agreements to be signed with the employees, who will receive a copy of the Code upon joining the Company and shall sign the Employee Compliance Commitment Form. It will also be notified to all the Directors who shall sign an undertaking to abide by its provisions.

Since **BioCarbon** could be responsible for the actions of third parties with whom it maintains contractual relations, we intend that all individuals and companies that contract with us must comply with the same standards and ethical principles as **BioCarbon**, especially suppliers, business partners, consultants, agents and intermediaries. Therefore, **BioCarbon** will give the appropriate guidelines to the

Company's Personnel, so that they ensure the third parties are informed of the content of this Code of Ethics and the contracts signed with them reflect its requirements.

Likewise, **BioCarbon** reserves the right to adopt measures it deems appropriate against Counterparties that fail to comply with the dispositions of this Code of Ethics or any other Company's policy.

This Code of Ethics cannot cover every situation. It should be seen as a guide for safeguarding **BioCarbon**'s commitment to ethical and responsible practices.

### 3 Our commitment to strong ethical standards

Personnel of **BioCarbon** shall always avoid behaviors that could damage or risk our reputation and always put the interests of the Company ahead of their personal interests. Integrity, honesty, transparency and quality are the foundation of our success, and we are committed to supporting these values on a daily basis.

### 4 Appointed Compliance Function

We have appointed a Compliance Officer with sufficient autonomy and adequate resources to manage our compliance efforts, spread an ethical culture and ensure that we have appropriate policies, procedures and controls to mitigate and manage our compliance risks effectively and efficiently.

The Compliance Officer proactively supports Senior Management and the business through effective compliance risk management practices to ensure that all business is conducted in an honest, fair and transparent way. The Compliance Officer also supervises and monitors the implementation and effectiveness of the Corporate Compliance Program in accordance with our Compliance Officer Manual.

In addition, the Compliance Officer will collaborate so that the developed training materials conform to the content of this Code of Ethics and the Company's policies, as well as to the requirements of the current legislations.

### 5 Commitment to compliance with laws, rules, and regulations

Legal compliance is of critical importance to us. **BioCarbon** requires all directors, employees, clients and other third parties acting on its behalf to comply with all applicable laws, rules and regulations.

Everyone in the Company is empowered to take responsibility for their conduct, should respect the Company's Code of Ethics, understand and accomplish

compliance objectives and adhere to the policies and procedures applicable to them.

## 6 BioCarbon's Values and Principles

The corporate values and principles are extremely important to us as they support our vision and mission and reflect our identity. They shape the corporate culture of **BioCarbon** by setting the guiding principles of our culture. All the directors and employees of **BioCarbon** need to abide by and agree to these values and principles, namely:

### ***Integrity***

Integrity implies that all our personnel will conduct business in an honest way and will show consistent adherence to strong moral and ethical practices and values inside and outside the Company.

Integrity is enshrined both in internal policies, procedures and practices as well as the external dealings with public officials, competitors and other third parties.

### ***Transparency***

The Company is transparent regarding the way in which its decisions are made, implemented and reviewed.

The principle of Transparency also refers to our corporate purpose by providing, generating and making information publicly available that allows to understand the scope, coverage, and limitations of the certification and registration of GHG projects and biodiversity initiatives. **BioCarbon** is committed to disclose sufficient and appropriate information related to GHG and biodiversity projects, to allow future users to make decisions with reasonable confidence.

### ***Liability***

Everyone in **BioCarbon** is responsible relative to their roles and responsibilities. The aim is for the directors, employees, clients and third parties acting on behalf of **BioCarbon** to ensure and respect their obligations while adopting an ethical behavior inside and outside the Company.

### ***Quality***

The personnel of **BioCarbon** must fulfil their obligations in a professional way and give due attention to the quality of their work.

**BioCarbon** undertakes to offer to all its clients a high standard of excellence and quality in all its services. For this reason, we have set up a Technical Committee responsible for providing support in constructing methods, data and conceptual approaches to ensure the quality of GHG and biodiversity projects that are certified and registered with the **BCR** Standard.

### **Accuracy**

We are committed to manage the information in an accurate manner in order to avoid systematic errors in the calculation of emissions, emission reductions or GHG removals, minimize uncertainty, increase confidence in the data for decision-making and produce reliable, comparable and consistent and reproducible results.

### **Good Governance**

Decision-making is based on norms, practices, behaviors, cultures and processes that create and maintain our Company with clear purposes that deliver long-term value consistent with the expectations of internal and external stakeholders.

### **Equality**

**BioCarbon** treats its internal and external stakeholders equally and fairly, by applying the same rules and rights to each of them regardless of their differences.

We are committed to ensuring that no employee or external stakeholder receives less favorable treatment on the grounds of gender, marital status, race, color, ethnicity or nationality, origin, religion, and without arbitrary restrictions in respect of age, or is disadvantaged by conditions or requirements which cannot be shown to be justified.

Our decisions regarding the recruitment and selection of individuals are based on their educational and professional background as well as their organizational and motivational fit to **BioCarbon**.

### **Sustainability**

Sustainability is embedded into the culture of **BioCarbon** and in the behavior of its employees. We are dedicated to the certification and registration of GHG projects and biodiversity conservation initiatives, which promotes climate change mitigation actions, favoring low-carbon growth and ensuring compliance with national policies and related to the sustainable development goals.

In addition to the principles and values set above, **BioCarbon** reaffirms its support to the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, Environment and Anti-Corruption.

We have committed ourselves to making the United Nations Global Compact Initiative and its principles part of the strategy, culture and daily actions of our Company, as well as getting involved in cooperative projects that contribute to the Goals of Sustainable Development.

## **7 Protection of human rights**

**BioCarbon** abides by all legislations and regulations pertaining to Human Rights. This includes adherence to the 1948 Universal Declaration of Human Rights of the United Nations which lays emphasis, amongst others, on zero child labor, zero

forced labor, zero discrimination on account of gender or ethnicity. We engage to treat our internal and external stakeholders with respect, dignity, fairness, equality, integrity regardless of their diversity and differences.

## 8 Loyalty

**BioCarbon**'s personnel will remain loyal to the Company and will not defame about **BioCarbon** to anyone nor in any places. The aim is for the employees, clients and stakeholders to be good ambassadors acting in the name of the Company, inside and outside the framework of the business relationship at all times and in every location.

The personnel and the other stakeholders of the Company will ensure full protection of every information including confidential information circulated internally or externally to the Company.

Moreover, the employees of **BioCarbon** will take due care when using the Company's assets and devices. They are prohibited to trade on material inside information or tipping off others so they may trade. Insider trading is against the law and may result in disciplinary actions, legal proceedings, or criminal charges.

## 9 Conflict of interest

The personnel of **BioCarbon** have an obligation to engage in conducts that protect and promote the best interest of the Company.

**BioCarbon** and its personnel will avoid entering in business relationships involving a conflict of interest and will fully disclose to the Compliance Officer any financial or personal interests, activities, or personal or familial relationships that create an actual or perceived conflict of interest.

If the directors or employees are unsure whether a situation consists of a conflict of interest, they must seek advice from the Compliance Officer at [compliance.officer@biocarbonregistry.com](mailto:compliance.officer@biocarbonregistry.com) in accordance with our policy and procedures for handling conflict of interest.

BioCarbon's personnel shall not make any personal investment in our competitors if the investment might harm the Company. To determine whether the investment creates a conflict of interest, personnel should consider the relationship between the business of **BioCarbon** and their role in the Company. If the directors or employees (actually or seemingly) cannot maintain impartiality in their business decisions, they should disclose it immediately to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com).

No employee of **BioCarbon** should have any external business interest which diverts a significant amount of their time or attention from their duties and responsibilities with regards to **BioCarbon**. Employees are prohibited from being

employed, either directly or indirectly, as an employee, director, officer, or consultant of a competitor.

## 10 Prohibition of corrupt behavior

**BioCarbon** expresses a Zero-Tolerance Corruption Policy by condemning any form of bribery and corruption including facilitation payments. Our directors, employees and third parties must never, directly or through intermediaries, offer or accept bribes or let others bribe or corrupt on their behalf.

Moreover, our personnel must refrain from any activity or behavior that could result in such conduct. Anything of value, such as cash, gifts or a favor can be considered a bribe when offered in exchange for a decision. **BioCarbon's** personnel must consult our policies and procedures before offering or accepting anything of value.

**BioCarbon** is subject to the Anti-Corruption regulations as well as to the Anti-Bribery laws of the countries in which it operates. All **BioCarbon** personnel and third parties must adhere to these laws and regulations, as well as the policies, procedures, and internal controls established with the aim of prohibiting the offering, promising, giving, accepting, or soliciting of an undue advantage of any value.

**BioCarbon** reserves the right to take any further required action to sanction people who take part in corruption acts, who engage in corruption or who breach any of the Company's Code, policies, laws and regulations.

## 11 Political contributions

**BioCarbon** and its personnel will not contribute nor make donations for the political campaigns or any other political event.

The directors, employees and third parties acting on behalf of **BioCarbon** and the Company itself are prohibited from making political contributions.

**BioCarbon** reserves the right to take disciplinary actions which may lead to the dismissal of the employee making political contributions or the termination of the relationship with the third-party.

## 12 Gifts and Entertainment

Exchanging gifts with business partners is an extended practice and often a positive part of doing business. However, **BioCarbon** cannot allow the exchange of gifts and hospitality to influence or appear to influence its independent business judgment or the independent judgment of its third parties.

In this sense, the employees of **BioCarbon** shall not give or receive any gift, meal, entertainment or other business courtesy that creates a sense of obligation or



compromises professional judgment. We have policies and guidelines in place that help employees identify the circumstances under which gifts and entertainment are considered as proper dealings.

### **13 Personnel's responsibility to protect the Company's assets**

Employees shall never engage in fraudulent or dishonest activities involving physical and electronic assets of **BioCarbon**, such as furniture, equipment, tools, inventory, computer hardware and software, etc. Every employee is encouraged in safeguarding the organization's assets from loss, damage, theft, waste, and improper use.

### **14 Using e-mail and mobile devices**

The Company provides to its employees' resources for professional purposes that will be determined by **BioCarbon**.

**BioCarbon's** employees are expected to use the Company's resources in a professional, ethical, responsible and lawful manner and to maintain the Company's resources in an optimal and good functioning condition at all times.

The personal use of **BioCarbon's** resources is prohibited except in exceptional circumstances which have been granted an authorization prior to the use.

The email, Internet connection and the Company's landline telephone terminal made available to the employees, where appropriate, are for professional use only and the employees must make appropriate and responsible use of these resources belonging to **BioCarbon**.

The employees may be liable for damages caused by the lack of due care with regards to **BioCarbon's** resources, depending on the current circumstances.

### **15 Intellectual Property rights**

Our Intellectual Property rights (trademarks, logos, copyrights, trade secrets, standards and methodologies and know-how) are among the most valuable assets of our Company.

Intellectual Property developed by **BioCarbon** is a fundamental and critically valuable resource. Employees, clients, business partners, consultants and other third parties working for the organization are prohibited from copying, selling, or distributing all forms of Intellectual Property.

Employees must never use the organization's Intellectual Property without prior approval. Any violation of this rule can result in criminal charges.

## 16 Confidentiality

The employees of **BioCarbon** are at all times responsible for ensuring the confidentiality of any information transmitted physically or by any electronic means (email, messaging, Internet, etc.).

The employees of **BioCarbon** are not allowed to send private or confidential information through the Internet or outside the protected environment of **BioCarbon** unless expressly authorized by the Senior Management of the Company.

No confidential documents concerning **BioCarbon**, any other enterprise associated with it and its clients should be removed or handed over to people outside the Company and competing companies during or after employment with **BioCarbon**.

If an authorization is granted, the employees will be responsible to take special care to ensure that confidential information is adequately protected or encrypted and sent only to those recipients authorized to receive it.

Confidential information includes, but is not limited to information related to clients, client listings or requirements, strategies and business plans, lists of contractors, details of remuneration, project details, internal procedures, etc.

Non-compliance with the rules established by **BioCarbon** regarding the use of information and communication technologies, will allow **BioCarbon** to take the appropriate disciplinary measures to sanction such non-compliance.

## 17 Respect of the environment

**BioCarbon** has at heart the protection of the environment and hence conducts its activity in respect of environment and supporting the sustainable development.

Our corporate purpose, vision and mission statements were designed around supporting the promotion of climate change mitigation actions.

Since **BioCarbon** was founded, the Company has been dedicated to the certification and registration of GHG projects and biodiversity conservation actions. Thus, excellent environmental management and the combating climate change are intrinsic to the business itself and are present in all activities and areas of our Company.

## 18 Good tax practices

**BioCarbon** intends to comply with its tax obligations in all the territories in which it operates and to maintain adequate relations with the corresponding Tax

Administrations, adhering, where appropriate, to the systems and recommendations, that are established in each jurisdiction.

The financial statements of **BioCarbon** and any other document pertaining to the Company's accounting shall correctly reflect **BioCarbon**'s financial and fiscal situation.

Transactions aimed at evading taxes or falsifying the accounts or financial information of the Company will not be allowed.

**BioCarbon**'s Personnel shall take due care of the Company's assets and shall ensure that its assets do not suffer loss or impairment. Moreover, **BioCarbon**'s Personnel shall always ensure that all the accounting and financial books and records of the Company accurately, transparently and completely reflect its operations, transactions, acquisitions and disposition of assets.

## 19 Conduct in the workplace

At **BioCarbon**, employment is based solely on individual merits and qualifications related to professional competence. We strictly condemn any form of discrimination on the basis of race, religion, gender, origin, age, marital status, medical conditions, sexual orientation, or any other characteristics protected by law.

**BioCarbon** is committed to maintaining a work environment free of any forms of discrimination and harassment. We embrace diversity and respect the personal dignity of each of our employees. We strongly believe that everyone should have an equal chance to succeed.

We believe that it is in everyone's best interests to ensure that the experience, talents and skills available throughout our company are considered when employment or development opportunities arise.

Equal opportunities impose rights and responsibilities for every employee. Everyone has a right to fair and dignified treatment. This means that no-one will be discriminated against nor harassed. Every employee has an obligation to ensure fair and dignified treatment. The contribution of everyone will be valued and everyone will be treated purely on their merits. Everyone must act fairly, within our stated policies and the law.

Acts of discrimination, harassment, bullying or victimization against employees or other stakeholders are disciplinary offences and will be dealt with under the organization's disciplinary procedure.

## 20 Occupational health and safety

**BioCarbon** is committed to preventing work-related injury and ill health and providing a safe and healthy workplace to its employees. The Company prohibits any form of violence. The employees of **BioCarbon** are empowered to take immediate action for others' safety, regardless of their role, title, or responsibility.

If you notice any risks to the safety and health of any employee within the Company, you are invited to report same to **BioCarbon's** Compliance Officer immediately.

## 21 Anti-monopoly

**BioCarbon** is committed to competing in full compliance with all applicable anti-monopoly and competition laws. We prohibit any conduct that could restrict free trade. We compete and succeed based on our own merits. Therefore, employees are required to adhere to the following rules:

- (i) Commercial prices will never be agreed, formally or informally, with competitors or other parties.
- (ii) Clients or markets will always be based on fair competition.
- (iii) Clients, suppliers, and competitors will always be dealt fairly.
- (iv) Sensitive information, such as prices, costs, market distribution, etc., will never be shared with our competitors.
- (v) Business arrangements or strategies with the purpose of harming a competitor will never be set.
- (vi) **BioCarbon's** strength will never be used to gain unfair competitive advantages.

If you find yourself doubtful about the competition laws and how they apply to you, please notify the Compliance Officer.

## 22 Protection of personal data

**BioCarbon** collects personal data to effectively carry out its everyday business functions and activities and to provide the services in connection with its business. Such data is collected from employees as well as from suppliers, contractors and clients and includes (but is not limited to), name, address, email address, date of birth, identification numbers, private and confidential information, special categories of personal data and bank/credit card details.

We respect and value the privacy of our employees, clients, suppliers, contractors and other stakeholders. We handle their personal information appropriately. We

comply with data protection laws on how to responsibly collect, store, use, share, transfer, and dispose personal information.

The data protection laws include provisions that promote accountability and governance and as such we have put comprehensive and effective governance measures in place to meet these provisions. The aim of such measures is to ultimately minimize the risk of breaches and uphold the protection of personal data.

The employees of **BioCarbon** will respect the privacy of the other employees, clients and stakeholders of the Company and they will not share the personal data of their colleagues, clients and stakeholders with anybody outside the organization. Each employee is required to protect all personal information by using it adequately and not sharing it with anyone according to our Data Protection Policy.

## 23 Prevention of Money Laundering and Terrorist Financing

**BioCarbon** takes the prevention of actions related to Money Laundering, Terrorist Financing and Proliferation Financing seriously and will not knowingly breach the principles and obligations set out in the Anti-Money Laundering and Combatting the Financing of Terrorism (hereinafter, AML/CFT) national and international regulations.

We will not knowingly become involved in, or turn a blind eye to, arrangements that assist others to take part in activities contrary to the AML/CFT regulations.

**BioCarbon**'s personnel will not knowingly provide services to any person that is:

- Subject to financial sanctions in any jurisdiction
- Knowingly in possession of the proceeds of crime or involved in the concealment of their origin, location or ownership.
- Knowingly involved in the supply, storage, distribution of funds or property with the intent of being used by their holders to commit terrorist offences, whether directly or indirectly.

**BioCarbon**'s personnel shall abide by the procedures and controls to verify, prevent and impede collaboration with persons engaged in Money Laundering and Terrorist and Proliferation Financing or being used by them for those purposes.

The employees, clients and stakeholders of **BioCarbon** will report to the Compliance Officer of the Company through the Ethics and Compliance Channel (see below section 25) as soon as they are aware of a possible Money Laundering or Terrorist/Proliferation Financing offence within the organization or in the course of the business relationship.

## 24 Principles inherent to the rights of workers

We acknowledge that recognizing the efforts of employees as well as rewarding them for good performance is a way to motivate and boost their confidence. We embrace cultural diversity and encourage employees' integration by promoting and rewarding teamwork. Our aim is to discourage any discriminatory practices and behaviors among our employees.

## 25 Situations that shall be reported

**BioCarbon** encourages its personnel, third parties, clients and other stakeholders to report breaches or suspected breaches with regards to transnational bribery and corruption, conflict of interest, fraud and misappropriation, money laundering, terrorist financing and proliferation financing, Anti-monopoly, accounting aspects, falsification of documents, failures to the Code of Ethics, internal policies and procedures, harassment and/or discrimination.

We have implemented an Ethics and Compliance Channel, a tool freely available to our internal and external stakeholders to be used confidentially or anonymously to report cases of suspected or actual misconducts or wrongdoings, with full confidence and without fear of retaliation. We also encourage our internal and external stakeholders to use our Ethics and Compliance Channel to raise questions and/or concerns about possible breaches of the principles and standards of the company, established in this Code of Ethics, as well as in its Policies, regulations or any applicable laws.

No concern is too minor to report. **BioCarbon** respects its diverse workforce and takes all appropriate actions to protect the identity of the reporting person and of the reported person. We will not retaliate or permit retaliation against anyone who raises concerns about a possible misconduct or legal violations.

The Compliance Officer will receive and treat individually and confidentially the complaints received as per our Whistleblowing Policy and Internal Investigations Manual; and in case of a conflict of interest, we will ensure that specific protocols are put in place and respected to guarantee the principles of impartiality, trust and whistleblower protection.

## 26 Protection against retaliation

**BioCarbon** encourages its employees, third parties, clients and other stakeholders to report any breaches or suspected breaches with regards to transnational bribery and corruption, conflict of interest, fraud and misappropriation, money laundering, terrorist financing and proliferation financing, Antitrust, accounting aspects, falsification of documents, Code of Ethics, internal policies and procedures,

harassment and/or discrimination without the risk of consequent threats, harms, discrimination, retaliation or drawbacks.

There shall be no adverse consequences for a whistleblower whose report is filed in “good faith”. Reporting in good faith means providing accurate, complete and precise information, even if it is subsequently proven to be a mistake. A whistleblower who reports and provides information “in bad faith” will be subject to disciplinary measures or legal actions as appropriate.

Employees, clients, stakeholders and the reporting person of **BioCarbon** are protected against any form of retaliation and dismissal when reporting.

## 27 Consequences of Non-Compliance

At **BioCarbon**, while we ensure that every employee is treated fairly, disciplinary misconduct is not tolerated. We do believe that rewarding good behavior and sanctioning bad behavior reinforces a culture of compliance.

The provisions of this Code of Ethics are mandatory and are part of the obligations of the employees of **BioCarbon**. The violation of the Code of Ethics and of its provisions will be subject to sanctions provided by the current Laws. Moreover, we have a disciplinary procedure in place to sanction bad behavior.

It is the responsibility of each employee to ensure full compliance with all the provisions of this Code of Ethics and seek guidance, where needed, from the Compliance Officer. Any breach or failure to comply with this Code of Conduct or with any laws, regulations and policies set up by **BioCarbon** may result in disciplinary actions, legal proceedings, or criminal charges.

Any personnel of the **BioCarbon** who becomes aware of any breach of the Code of Ethics, of the Company’s policies and/or of the regulations, must submit a complaint through the Ethics and Compliance Channel.

## 28 Disclosure of the Code and Training Actions

This Code of Ethics shall be made available to the employees and stakeholders of the Company and shall remain posted on **BioCarbon**’s website. All the personnel of **BioCarbon** will be provided with training and will be subject to continuous development support and mentoring to ensure that they are competent and knowledgeable for the role they undertake. **BioCarbon** will keep record of the training and will document its effective realization.

Any queries or concerns about the provisions of this Code of Ethics or its application, should be submitted through the Ethics and Compliance Channel or directed to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com).

## Appendix 1: Definitions

Anti-Money Laundering or AML	Set of policies, procedures and technologies that prevents Money Laundering.
Antitrust	Preventing or controlling trusts or other monopolies and promoting fair competition in business.
Bribery	Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of the location(s), in violation of applicable laws, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.
Client	Individual or organization that might receive or is receiving a product or service intended for or required by that individual or organization.
Combatting the Financing of Terrorism or CFT	Involves investigating, analyzing and preventing sources of funds for terrorist activities intended to achieve political, religious, or ideological goals.
Compliance Officer	An employee of a company that ensures the firm complies with its outside regulatory and legal requirements as well as with the internal policies and procedures.
Confidential Information	Any information (whether written, electronic, oral, digital or otherwise) protected against unrestricted disclosure to third parties or that is considered confidential under the circumstances of such disclosure or its contents. Confidential information shall include in particular: personal data, products, software, programs, prices, manufacturing processes, know-how, inventions, business relationships, business strategies, business plans, financial planning, human resources, digitally embodied information (data).
Conflict of interest	Situation where business, financial, family, political or personal interests could interfere with the judgment of persons in carrying out their duties for the organization.
Corruption	It is the abuse of entrusted power for private gain.
Ethics	Based on core values and norms, it is a set of standards for the conduct in government, companies, society that guides decisions, choices and actions.
Facilitation payments	Small payments made to secure or expedite the performance of a routine or necessary action to which the payer is legally entitled or otherwise.



Fraud	The offence of intentionally deceiving someone in order to obtain an unfair or illegal advantage (financial, political or otherwise).
Gifts	Money, vouchers, goods or services, which, if given appropriately, are a mark of friendship or appreciation. A gift is professedly given without expectation of consideration or value in return.
Governance	A concept that goes beyond the traditional notion of government to focus on the relationships between leaders, public institutions and citizens, including the processes by which they make and implement decisions. The term can also be applied to companies and NGOs. "Good" governance is characterized as being participatory, accountable, transparent, efficient, responsive and inclusive, respecting the rule of law and minimizing the opportunities for corruption.
Hospitality	This is given or received to initiate, cement or develop relationships. It includes meals, receptions, tickets for entertainment, social or sports events. Hospitality requires the host to be present.
Integrity	Behaviors and actions consistent with a set of moral or ethical principles and standards that are embraced by individuals as well as institutions. Integrity creates a barrier to corruption. See the definition of "Ethics" above.
Intellectual Property rights	All rights associated with intangible assets owned by a person or company and protected against the use without consent.
Personal Data	Personal data means any information relating to an identified or identifiable natural person ("data subject").
Personal Data breach	Personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
Personnel	Organization's directors, officers, employees, temporary staff or workers, and volunteers.
Political contributions	Any contribution, made in cash or in any kind, to support a political cause. Examples include gifts, properties or services, advertising or promotional activities supporting a political party and the purchase of tickets for fundraising events.
Proliferation Financing	The act of providing funds or financial services which are used, in whole or in part, for the manufacture, acquisition, possession, development, export, trans-shipment, brokering, transport, transfer, stockpiling or use of nuclear, chemical or biological weapons and their delivery means and related materials.

Public Officials	Members of public entities, employees and workers of the State and its territorially decentralized entities.
Stakeholder	Person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.
Third-Party	Person or body that is independent to the organization.
Transparency	Characteristic of governments, companies, organizations and individuals of being open in the clear disclosure of information, rules, processes and actions.
Whistleblower	A whistleblower is a person, usually an employee, who exposes information or activity within a private, public, or government organization that is deemed illegal, immoral, illicit, unsafe, a fraud, or an abuse of taxpayer funds.