



# Anti-Corruption Policy and Procedures

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## 1 Policy Statement

BioCarbon (hereinafter referred to as BioCarbon) adopts a zero-tolerance approach to fraud, corruption, and bribery, including transnational bribery.

BioCarbon is committed to maintaining the highest standards of integrity, transparency, and ethical conduct in all activities conducted under its governance and in the programs it administers.

This Policy is aligned with internationally recognized anti-corruption frameworks, including the United Nations Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act, and other internationally recognized anti-corruption standards, as well as with applicable national legislation in the jurisdictions where BioCarbon operates.

BioCarbon does not tolerate the offering, promising, giving, requesting, or acceptance of bribes or any other undue advantage, whether directly or indirectly, by BioCarbon personnel or by any person or entity acting on its behalf.

In addition, BioCarbon supports internationally recognized principles of responsible and ethical business conduct, including the Ten Principles of the United Nations Global Compact, particularly those related to anti-corruption.

Through this Policy, BioCarbon establishes the principles, responsibilities, and procedures necessary to prevent, detect, and address corruption, bribery, and related misconduct in all BioCarbon activities.

## 2 Purpose

The purpose of this Policy is to establish the principles, responsibilities, and procedures through which BioCarbon prevents, detects, and addresses corruption, bribery, and related misconduct in all activities conducted under its governance.

This Policy supports BioCarbon's commitment to internationally recognized integrity standards, including the Ten Principles of the United Nations Global Compact, particularly those related to anti-corruption.

It also aims to ensure that BioCarbon complies with applicable anti-corruption laws and internationally recognized regulatory and compliance frameworks.

Through the implementation of this Policy, BioCarbon establishes governance measures and internal controls designed to mitigate risks related to fraud, bribery, corruption, and conflicts of interest.

This Policy also provides guidance to persons and entities involved in BioCarbon activities on the ethical standards and conduct expected in the performance of their responsibilities.

### 3 Scope

For the purposes of this Policy, “BioCarbon” refers to the organization responsible for administering the BioCarbon programs.

This Policy applies to all persons and entities involved in the activities of BioCarbon and in the programs administered by the organization.

This includes, but is not limited to:

- (a) members of the Board of Directors and other governance bodies;
- (b) members of the Technical Committee and advisory bodies;
- (c) officers, employees, collaborators, consultants, interns, temporary staff, and volunteers of BioCarbon;
- (d) personnel of the Compliance Area and other operational units;
- (e) Conformity Assessment Bodies (CABs) and their personnel performing validation, verification, or audit activities under BioCarbon programs;
- (f) the Registry Operator and any delegated registry authority responsible for registry administration;
- (g) third parties acting on behalf of BioCarbon, including business partners, intermediaries, consultants, agents, contractors, subcontractors, suppliers, and professional service providers; and
- (h) any other individual or organization participating in activities conducted under BioCarbon programs.

Adherence to this Policy is mandatory for all persons and entities covered by this Scope. Compliance with the principles and procedures established herein constitutes a condition for participation in BioCarbon activities and programs.

Failure to comply with this Policy may result in appropriate corrective measures, including disciplinary action, suspension of functions or assignments, termination of contractual relationships, and where applicable, legal action.

## 4 Objectives

This Policy establishes the principles and procedures through which BioCarbon prevents, detects, and responds to corruption, bribery, and conflicts of interest in all activities conducted under its governance and the programs it administers.

Specifically, this Policy aims to:

- (a) Prevent corruption and bribery in all forms, including transnational bribery and facilitation payments, in accordance with applicable national and international anti-corruption laws and standards;
- (b) Ensure the identification, disclosure, and management of conflicts of interest, including real, potential, or perceived conflicts that may affect the independence, impartiality, or credibility of BioCarbon programs;
- (c) Safeguard institutional independence and impartial decision-making by establishing structural controls, including separation of functions, independence requirements, and conflict-of-interest management mechanisms;
- (d) Prevent the offering or acceptance of improper benefits, including gifts, hospitality, donations, sponsorships, or other advantages that could influence professional judgment or program decisions;
- (e) Establish clear accountability mechanisms for the prevention and management of corruption and conflicts of interest, including the role of the Compliance Officer and documented oversight processes;
- (f) Provide effective reporting mechanisms that allow employees, collaborators, CABs, and third parties to confidentially report suspected misconduct through the Ethics and Compliance Channel;
- (g) Promote a culture of integrity, transparency, and ethical conduct among all persons and entities participating in BioCarbon programs;
- (h) Protect the credibility, environmental integrity, and reputation of BioCarbon programs by ensuring that all program activities are conducted in accordance with recognized international integrity standards.

Through these objectives, BioCarbon seeks to maintain the highest standards of integrity, transparency, and accountability in the administration of its programs.

## 5 Definitions

### **BioCarbon programs**

The environmental crediting frameworks administered by BioCarbon, including the BioCarbon Standard and any other environmental crediting mechanisms, initiatives, or programs developed and operated under its governance.

### **Bribery**

It is the 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.

### **Conformity Assessment Body**

An independent third-party organization accredited under applicable international standards (such as ISO/IEC 17029 and ISO 14065) and authorized to conduct validation, verification, or audit activities under BioCarbon programs.

### **Conflict of Interest**

A situation in which financial, business, professional, family, political, or personal interests could influence, compromise, or reasonably be perceived to influence the independence, impartiality, or objective judgment of an individual or organization performing duties under BioCarbon programs.

A conflict of interest may arise when a person or entity is confronted with a situation in which private interests, relationships, or external obligations conflict with the responsibilities associated with their role within BioCarbon.

Conflicts of interest may be:

- (a) Actual, where a direct conflict exists;
- (b) Potential, where circumstances could give rise to a conflict in the future; or
- (c) Perceived, where a reasonable third party could question the impartiality or independence of the person or organization involved.

For the purposes of this Policy, conflicts of interest may apply to both individuals and organizations, including employees, governance bodies, consultants, and Conformity Assessment Bodies (CABs) participating in activities conducted under BioCarbon programs.

Conflicts of interest shall be identified, disclosed, and managed in accordance with the procedures established in this Policy.

### **Conflict of Interest Declaration**

A formal disclosure submitted by individuals or entities participating in BioCarbon activities to declare any real, potential, or perceived conflicts of interest that may affect their independence, impartiality, or objectivity.

### **Community or social investment**

Contributions intended to support environmental, educational, research, or capacity-building initiatives aligned with BioCarbon's mission.

### **Compliance Officer**

The individual appointed by BioCarbon to oversee the implementation of this Policy and related compliance frameworks, including anti-corruption controls, conflict-of-interest management, whistleblowing mechanisms, and integrity safeguards.

### **Corporate Sponsorship**

Financial or in-kind support provided to events, conferences, research initiatives, or educational activities aligned with BioCarbon's mission.

### **Corruption**

It is the abuse of entrusted power for private gain.

### **Due Diligence**

It is the process to further assess the nature and extent of the bribery risk and help organizations to make decisions in relation to specific transactions, projects, activities, third parties and personnel.

### **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 entitled, legally 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. A gift may be used to express a common purpose and the hope of future business success and prosperity. It may be given in appreciation of a favor done or to be carried out in the future. A gift has no role in the business process other than that of marking and enhancing relations or promoting the giver's enterprise by incorporating a logo or message on a promotional item.

## **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.

## **Independence**

The absence of relationships, interests, or circumstances that could compromise, or reasonably be perceived to compromise, the objectivity, impartiality, or professional judgment of an individual or organization involved in BioCarbon activities.

## **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 an obstacle to corruption. See the definition of "Ethics" above.

## **Kickbacks**

Bribes fulfilled after an enterprise has awarded a contract to a customer. They take place in purchasing, contracting, or other departments responsible for decisions to award contracts. The supplier provides the bribe by kicking part of the contract fee back to the buyer, either directly or through an intermediary.

### **Personnel**

Directors, internal collaborators, employees, temporary staff or workers, and interns.

### **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.

### **Public Official**

Any person acting in an official capacity or under the authority of a government (national, departmental, municipal, both at centralized and decentralized level) to perform governmental responsibilities, on behalf of the government, agency, department, regulatory authority, or any commercial enterprise owned or controlled by the government.

### **Registry Operator**

The independent third-party entity responsible for operating the registry system supporting BioCarbon programs, including the issuance, transfer, retirement, and tracking of environmental credits and associated data.

### **Stakeholder**

Person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.

### **Transparency**

Characteristic of governments, companies, organizations and individuals of being open to the clear disclosure of information, rules, processes and actions.

### **Whistleblowing**

Employee, director, or external person making a disclosure in the public interest, in an attempt to revealing, neglecting or abusing within the activities of an organization, government body or company (or one of its business partners) that threatens public interest, its integrity and reputation.

## **6 Institutional independence and incentive safeguards**

BioCarbon shall maintain structural safeguards to prevent financial, commercial, or operational pressures from influencing certification, registration, validation, verification, or credit issuance decisions.

### **Prohibition of issuance-linked incentives**

No member of the Board of Directors, Technical Committee, Compliance Area, Program Management, or any decision-making authority shall receive remuneration, bonuses, commissions, or any form of variable compensation directly or indirectly linked to:

- (a) The number of projects approved or rejected;
- (b) The volume of Verified Carbon Credits (VCCs), BioCredits, or Water Credits issued;
- (c) The commercial performance, placement, or market value of issued credits.

### **Registry operator independence**

The external Registry Operator shall operate under contractual arrangements that preserve its operational and technical independence.

Compensation arrangements with the Registry Operator shall not be contingent upon technical approval outcomes or credit issuance decisions.

### **Separation of functions and institutional safeguards**

BioCarbon maintains a formal and documented separation between the principal institutional functions associated with the BioCarbon programs in order to safeguard independence, prevent conflicts of interest, and ensure the integrity of certification and credit issuance decisions.

This separation applies, at a minimum, to the following functional domains:

- (a) Strategic governance functions, exercised by the Board of Directors and other governance bodies responsible for institutional oversight, strategic direction, and accountability;
- (b) Technical decision-making functions, including methodological review, project eligibility assessment, validation and verification oversight, and certification decisions carried out through the Technical Committee and authorized technical bodies;
- (c) Operational execution functions, including program administration, project intake, stakeholder engagement, and day-to-day operational management performed by program management and administrative units; and
- (d) Registry administration, conducted by an independent third-party Registry Operator responsible for unit issuance, transfer, retirement, and data integrity within the registry system.

These functions operate under clearly defined mandates, roles, and reporting lines designed to ensure transparency, accountability, and impartiality in program operations.

To prevent conflicts of interest and undue influence, no individual or institutional body shall simultaneously perform consultancy services, commercial credit-related activities, validation or verification functions, and certification decision-making functions for the same mitigation activity or project.

Individuals or entities involved in the development, advisory support, or implementation of a mitigation activity shall not participate in its validation, verification, certification decision, or registry authorization processes.

Where a potential or perceived conflict of interest arises, the affected individual shall disclose the situation immediately in accordance with the Conflict-of-Interest procedures and shall recuse themselves from the relevant decision-making process. The Compliance Officer shall document such recusals in the Conflict-of-Interest Register and ensure appropriate mitigation measures are implemented.

These safeguards are designed to ensure that financial or commercial considerations do not influence certification, validation, verification, or registry decisions.

### **Alignment with governance framework**

The separation of functions described in this Policy operates within the broader governance framework of BioCarbon, as defined in the BioCarbon Governance Framework and the Long-Term Management Plan.

Roles and responsibilities across governance bodies, technical decision-making entities, operational management, and the independent Registry Operator are formally defined through institutional governance instruments, including the RACI model established for program oversight and operational accountability.

This governance structure ensures that strategic oversight, technical evaluation, operational execution, and registry administration remain functionally distinct, thereby reinforcing transparency, accountability, and impartial decision-making across all BioCarbon programs.

## **7 Compliance Officer**

BioCarbon has appointed a Compliance Officer responsible for overseeing the implementation and effectiveness of the organization's anti-corruption and integrity framework.

The Compliance Officer operates with functional independence in the performance of these responsibilities.

The Compliance Officer plays a key role in promoting an ethical culture and ensuring that BioCarbon maintains appropriate policies, procedures, and controls to prevent, detect, and manage risks related to corruption, bribery, fraud, and conflicts of interest in all activities conducted under its governance.

The Compliance Officer acts as an independent oversight function within BioCarbon and supports the organization in maintaining compliance with applicable laws, international anti-corruption standards, and internal integrity policies.

The Compliance Officer is responsible for identifying and assessing risks related to corruption, bribery, and misconduct, advising BioCarbon's governance bodies and personnel on compliance matters, and ensuring that appropriate mitigation measures are implemented.

In particular, the Compliance Officer shall be responsible for:

- (a) overseeing the implementation and continuous improvement of BioCarbon's Anti-Corruption Program;
- (b) promoting awareness of ethical conduct and integrity standards across BioCarbon through communication, training, and guidance;
- (c) ensuring that BioCarbon's activities are conducted in accordance with the Code of Ethics, this Anti-Corruption Policy, and other applicable integrity policies;
- (d) reviewing and addressing allegations of misconduct, corruption, or conflicts of interest, and overseeing the appropriate investigation processes;
- (e) ensuring the proper operation of BioCarbon's integrity and reporting mechanisms, including the Ethics and Compliance Channel;
- (f) providing guidance to governance bodies, personnel, and relevant third parties regarding corruption risks, conflicts of interest, and ethical conduct;
- (g) organizing and documenting periodic Anti-Corruption and Integrity training for BioCarbon personnel and other relevant participants;
- (h) monitoring international best practices and developments in anti-corruption standards and compliance frameworks;

- (i) reporting periodically to the Board of Directors on the implementation and effectiveness of the Anti-Corruption Program and recommending improvements where necessary;
- (j) overseeing the maintenance of relevant compliance registers, including those related to conflicts of interest, gifts and hospitality, donations and sponsorships, and other integrity-related records;
- (k) supporting the monitoring and periodic review of BioCarbon's anti-corruption and integrity controls to ensure their effectiveness.

Any questions relating to this Anti-Corruption Policy and its implementation may be directed to the Compliance Officer at: [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com)

## **8 Corruption and bribery**

BioCarbon adopts a zero-tolerance approach to corruption and bribery in all activities conducted under its governance and in the programs it administers.

This Policy is aligned with internationally recognized anti-corruption frameworks, including the United Nations Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the UK Bribery Act, and internationally recognized compliance standards such as ISO 37001 (Anti-Bribery Management Systems).

In addition, all persons and entities associated with BioCarbon shall comply with applicable anti-corruption laws and regulations in the jurisdictions where BioCarbon operates.

All persons and entities associated with BioCarbon, including directors, employees, collaborators, Conformity Assessment Bodies (CABs), contractors, and third parties acting on its behalf, are strictly prohibited from offering, promising, giving, requesting, or accepting any form of bribe or improper advantage.

No person acting for or on behalf of BioCarbon shall, directly or indirectly through intermediaries, engage in conduct that could constitute bribery, corruption, or undue influence in connection with any decision, certification activity, contractual relationship, or regulatory interaction.

A bribe is any undue advantage offered, promised, given, requested, or accepted with the intention of influencing the performance of a duty or obtaining an improper benefit.

Improper advantages may include, but are not limited to:

- (a) money or financial payments;
- (b) gifts, hospitality, or entertainment beyond acceptable professional courtesies;
- (c) employment opportunities or business favors;
- (d) preferential treatment in certification, procurement, or contracting processes;
- (e) confidential or privileged information; or
- (f) any other benefit intended to influence a decision or professional judgment.

Bribery may occur in several forms, including:

- (a) Active bribery, where a person offers or provides an undue advantage to influence another person's actions or decisions.
- (b) Passive bribery, where a person requests, solicits, or accepts an undue advantage in exchange for performing, influencing, or refraining from performing an official or professional duty.

Corruption may also arise through indirect mechanisms such as intermediaries, consultants, agents, or affiliated parties acting on behalf of an individual or organization.

BioCarbon strictly prohibits facilitation payments, which are unofficial payments made to secure or expedite routine administrative actions. Such payments are considered a form of bribery under many international anti-corruption standards.

All persons associated with BioCarbon shall adhere to the procedures, controls, and reporting mechanisms established in this Policy. Any suspected act of bribery or corruption shall be reported immediately in accordance with the reporting procedures set out in this document.

## **9 Gifts, hospitality, and similar benefits**

### **Principles and rules**

Gifts, hospitality, and similar benefits may present risks of bribery or undue influence if not properly managed.

BioCarbon recognizes that the exchange of modest gifts or hospitality may occur in the context of professional relationships. However, such benefits must never influence, or appear to influence, the independence, impartiality, or professional judgment of any person involved in BioCarbon activities.

Any gift, hospitality, or other benefit offered or received in connection with BioCarbon activities shall be:

- (a) transparent;
- (b) reasonable and proportionate;
- (c) provided for legitimate professional purposes; and
- (d) compliant with applicable laws, regulations, and this Policy.

BioCarbon strictly prohibits the offering, promising, giving, or accepting of gifts, hospitality, or other advantages that could improperly influence certification decisions, validation or verification activities, procurement processes, or other program-related determinations.

### **Procedures for declaration of gifts and hospitality**

In relation to gifts and hospitality, the following requirements shall apply:

- (a) Any gift or hospitality offered or received by BioCarbon personnel shall be disclosed to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com). The Compliance Officer shall record such disclosures in the Gifts and Hospitality Register, including the recipient, giver, estimated value, nature of the benefit, and purpose of the interaction.
- (b) Where the market value of a gift or hospitality is not known, the Compliance Officer shall determine a reasonable estimate of its value.
- (c) Gifts or hospitality offered to public officials or representatives of regulatory authorities require prior authorization from the Compliance Officer.
- (d) Personnel must obtain approval from the Compliance Officer before offering or accepting any gift or hospitality with an individual value of USD70 or more, or where the cumulative value from the same source exceeds USD70 within a six-month period.
- (e) Requests for approval shall be submitted using the Gift and Hospitality Disclosure Form (Annex 1) prior to offering the benefit or within five (5) days of receiving it.
- (f) BioCarbon personnel shall decline or return any gift or benefit that is inappropriate due to its value, nature, or circumstances, or that could reasonably be perceived as creating an obligation or influencing professional judgment.

- (g) Any suspected breach of this Policy shall be reported through the Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonstandard>).
- (h) The Compliance Officer shall review and investigate reported breaches and recommend appropriate corrective or disciplinary measures where necessary.
- (i) Where uncertainty exists regarding the appropriateness of a gift or hospitality, personnel shall seek guidance from the Compliance Officer before accepting or offering such benefit.
- (j) The Compliance Officer shall periodically review the Gifts and Hospitality Register and report relevant information to the Board of Directors as part of BioCarbon's compliance oversight processes.

## 10 Conflicts of interest

BioCarbon is committed to maintaining the highest standards of integrity, independence, and impartiality in all activities carried out under its governance and the programs it administers.

All persons and entities associated with BioCarbon shall conduct their duties in a manner that protects and promotes the best interests of the organization and preserves the credibility and integrity of the BioCarbon programs.

A conflict of interest arises when business, financial, family, political, professional, or personal interests interfere, or could reasonably be perceived to interfere, with the impartial and objective performance of duties carried out on behalf of BioCarbon.

Such situations may arise when an individual or entity is confronted with a choice between the obligations and responsibilities associated with their role within BioCarbon and their own private interests or relationships.

This Policy applies to all persons and entities involved in BioCarbon's activities, including:

- (a) members of the Board of Directors;
- (b) members of the Technical Committee and advisory bodies;
- (c) employees, collaborators, and consultants of BioCarbon;
- (d) personnel of the Compliance Area;
- (e) Conformity Assessment Bodies (CABs) and their personnel performing validation, verification or auditing activities;

- (f) the Registry Operator and any delegated registry authority; and
- (g) any other third parties acting on behalf of BioCarbon.

All such persons and entities are required to:

- (a) avoid situations that may give rise to real, potential, or perceived conflicts of interest;
- (b) promptly disclose any conflict of interest in accordance with the procedures established in this Policy;
- (c) cooperate with the Compliance Officer in the evaluation and management of such situations; and
- (d) refrain from participating in decisions or activities where their impartiality could reasonably be questioned.

Conflicts of interest shall be managed in accordance with the procedures described in the section “Procedure for avoiding Conflict of Interest”, including formal disclosure, assessment by the Compliance Officer, mitigation measures, and where necessary, recusal from the relevant activity or decision-making process.

BioCarbon maintains a structured system of conflict-of-interest management, including:

- (a) initial declarations upon appointment or contractual engagement;
- (b) annual conflict-of-interest declarations; and
- (c) project-level independence declarations for validation, verification, and audit assignments conducted by CABs.

These measures ensure the continuous identification, disclosure, and management of conflicts of interest in order to protect the independence, transparency, and credibility of BioCarbon programs.

### **Procedure for avoiding conflict of interest**

In order to preserve the independence, integrity, and impartiality of BioCarbon and the programs it administers, all persons and entities associated with BioCarbon activities shall actively identify, disclose, and manage any real, potential, or perceived conflict of interest that may arise in connection with their duties or participation in program activities.

The following procedures shall apply.

### Identification and Immediate Disclosure

Any person or entity associated with BioCarbon who becomes aware of a potential or actual conflict of interest shall disclose the situation as soon as they become aware of it.

Disclosure shall be made to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com), or through the Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonstandard>).

Disclosure may be made either:

- (a) by the person affected by the potential conflict of interest; or
- (b) by another individual who becomes aware of the situation.

Prompt disclosure is essential to allow BioCarbon to assess and manage the potential risk to independence or impartiality.

### Formal Declaration

All disclosures shall be submitted using the Conflict of Interests Declaration Form (Annex 2).

The declaration shall include sufficient information to allow the Compliance Officer to assess:

- (a) the nature of the interest;
- (b) the relationship between the interest and the relevant BioCarbon activity;
- (c) the potential impact on impartiality or decision-making.

Where necessary, the Compliance Officer may request additional information or supporting documentation.

### Assessment by the Compliance Officer

The Compliance Officer shall review each declaration and determine whether:

- (a) no conflict of interest exists;
- (b) a potential or perceived conflict exists that requires mitigation measures; or
- (c) a material conflict exists requiring recusal or prohibition of participation.

The evaluation shall consider the nature, magnitude, and relevance of the interest in relation to the BioCarbon activity concerned.

### Mitigation Measures

Following evaluation, the Compliance Officer may determine that:

- (a) the individual or entity may proceed with the activity without restriction;
- (b) the individual or entity may proceed subject to defined mitigation measures; or
- (c) the individual or entity shall recuse themselves from participating in the relevant activity, discussion, or decision-making process.

Recusal may apply to activities including, but not limited to:

- (a) certification decisions;
- (b) validation or verification oversight;
- (c) methodological review;
- (d) project eligibility assessment;
- (e) registry authorization processes.

### Documentation and Recordkeeping

All disclosures, assessments, and decisions shall be documented by the Compliance Officer in the Conflict-of-Interest Disclosure Register.

Where recusal is required, the Compliance Officer shall notify the relevant individual and Top Management by email. Both the individual and Top Management shall acknowledge receipt within three (3) working days.

Records shall be maintained in accordance with BioCarbon's recordkeeping policies and may be made available to authorized oversight bodies, accreditation entities, or regulatory reviewers where required.

### **Initial Conflict-of-Interest Declarations**

#### ***(a) Initial declaration for BioCarbon personnel***

All newly appointed directors, Technical Committee members, employees, collaborators, consultants, or other individuals assuming functions within BioCarbon shall complete the Conflict-of-Interest Declaration Form (Annex 2) prior to assuming their duties.

This initial declaration ensures that any potential or actual conflicts of interest are identified and assessed before the individual participates in decision-making, operational activities, or technical processes under the BioCarbon programs.

***(b) Initial independence declaration for Conformity Assessment Bodies (CABs)***

All Conformity Assessment Bodies (CABs) seeking accreditation or entering into contractual arrangements with BioCarbon shall complete the CAB Independence and Conflict-of-Interest Declaration (Annex 4) prior to commencing validation or verification activities under the BioCarbon programs.

This declaration ensures that any potential threats to independence, impartiality, or objectivity are identified and assessed before the CAB performs conformity assessment activities.

**Annual Conflict-of-Interest Declarations**

***(c) Annual declaration for BioCarbon personnel***

The Annual Declaration Form (Annex 3) shall be completed annually by:

- (a) members of the Board of Directors;
- (b) members of the Technical Committee and advisory bodies;
- (c) personnel of the Compliance Area;
- (d) all employees and collaborators of BioCarbon.

The declaration shall disclose any financial or non-financial interests that could give rise to actual, potential, or perceived conflicts of interest.

***(d) Annual declaration for Conformity Assessment Bodies (CABs)***

All accredited Conformity Assessment Bodies (CABs) operating under the BioCarbon programs shall complete the Annual CAB Independence and Conflict-of-Interest Declaration (Annex 4).

This declaration shall be completed by an authorized representative of the CAB and submitted annually, or whenever material changes occur that could affect the CAB's independence or impartiality.

**Project-level conflict-of-interest declarations**

In addition to the initial and annual independence declarations, Conformity Assessment Bodies (CABs) shall provide a project-level Conflict-of-Interest declaration for each validation, verification, or audit assignment conducted under the BioCarbon programs.

This declaration shall confirm that the CAB and the members of the evaluation team assigned to the activity:

- (a) do not have financial, professional, or personal relationships that could compromise their independence, impartiality, or objectivity in relation to the evaluated project or its participants;
- (b) have not provided consultancy services or advisory support to the evaluated project or its participants.

The declaration may be submitted using the CAB's internal conflict-of-interest declaration format, provided that it demonstrates compliance with the independence and impartiality requirements established by BioCarbon and applicable international accreditation standards.

The project-level declaration shall be submitted to BioCarbon prior to the commencement of validation, verification, or audit activities and shall be retained as part of the project audit documentation.

### **Condition for participation**

#### ***(e) Compliance requirement***

Submission of the applicable declarations (Annex 2, Annex 3, Annex 4, or project-level COI declaration) is a condition for maintaining decision-making authority, validation or verification assignments, registry access, or participation in BioCarbon program activities.

Failure to submit the required declaration may result in the temporary suspension of the relevant functions or assignments until compliance is restored.

#### ***(f) Awareness and responsibility***

Top Management shall ensure that all persons and entities associated with BioCarbon's activities are informed of this Policy and understand their obligations regarding conflict-of-interest disclosure and management.

All persons associated with BioCarbon, including accredited third parties, shall avoid or properly manage any real or perceived conflict of interest and shall refrain from participating in any decision-making process where impartiality may be compromised.

## **11 Procedures for travel, meetings, and professional engagements**

BioCarbon may occasionally support travel or related expenses for professional engagements connected to program administration, technical meetings, training activities, or audit-related functions.

Any such arrangements shall comply with the following principles:

- (a) Travel or related expenses shall be directly linked to legitimate program activities, such as audits, technical meetings, training events, stakeholder consultations, or governance functions;
- (b) All travel arrangements shall comply with applicable laws and regulations, as well as BioCarbon's internal financial and compliance procedures;
- (c) Any travel expenses supported by BioCarbon shall receive prior approval from the Compliance Officer or the designated responsible authority;
- (d) All travel-related expenses shall be transparent, reasonable, and proportionate, and shall be properly documented, including the beneficiary, purpose of travel, estimated value, and supporting justification;
- (e) Travel support shall be limited to necessary transportation, accommodation, and meals directly related to the relevant professional activity;
- (f) Travel arrangements shall not include luxury benefits, excessive hospitality, or entertainment that could reasonably be perceived as an attempt to influence professional judgment;
- (g) BioCarbon shall not cover expenses for family members, personal companions, or unrelated leisure activities;
- (h) Any travel support shall be recorded, where applicable, in the relevant internal registers maintained by the Compliance Officer.

## **12 Donations, sponsorships and Community Support**

Charitable donations, sponsorships, and community support activities may involve reputational and integrity risks if not properly managed. Such activities may be misused as mechanisms to improperly influence decisions or create undue advantages.

BioCarbon therefore applies strict transparency and compliance requirements to any form of donation, sponsorship, or community support provided in connection with its activities.

For the purposes of this Policy:

- (a) Charitable donations refer to voluntary contributions made to nonprofit organizations or initiatives that support social, environmental, educational, or scientific objectives without expectation of commercial return.
- (b) Community support or investment refers to contributions aimed at supporting capacity-building, research, environmental initiatives, training,

or stakeholder engagement activities related to sustainability or climate action.

- (c) Sponsorships refer to financial or in-kind support provided to events, conferences, research initiatives, or educational programs aligned with BioCarbon's mission and objectives.

BioCarbon does not use donations, sponsorships, or community support as commercial marketing tools, nor shall such contributions be used to influence certification decisions, validation or verification activities, registry operations, or regulatory processes.

Any donation, sponsorship, or community support activity shall:

- (a) be consistent with BioCarbon's mission and ethical principles;
- (b) comply with applicable laws and regulations;
- (c) be transparent, properly documented, and approved in accordance with BioCarbon's internal procedures;
- (d) not create any real or perceived conflict of interest or undue influence.

Contributions shall never be offered or made in order to obtain favorable treatment in relation to certification activities, project registration, validation or verification outcomes, procurement processes, or regulatory decisions.

### **Political donations**

BioCarbon and its personnel shall not make political contributions of any kind.

BioCarbon prohibits direct or indirect contributions to:

- (a) political parties,
- (b) political campaigns,
- (c) political organizations, or
- (d) individuals engaged in political activities.

This prohibition applies to financial contributions, in-kind contributions, sponsorships, or any other form of support that could be perceived as influencing political processes or public decision-making.

Any violation of this provision may result in disciplinary measures, including suspension of functions, termination of contractual relationships, or other appropriate actions in accordance with applicable laws and internal policies.

## **Charitable donations and sponsorships**

BioCarbon may provide charitable donations or sponsorships that support legitimate social, environmental, educational, research, or capacity-building initiatives aligned with its mission and ethical principles.

Such contributions shall:

- (a) comply with applicable laws and regulations in the jurisdictions where BioCarbon operates;
- (b) be consistent with BioCarbon's integrity and transparency standards; and
- (c) not create real, potential, or perceived conflicts of interest.

Charitable donations and sponsorships shall never be offered, promised, or made with the intention of influencing certification decisions, validation or verification outcomes, regulatory processes, or any other program-related determinations.

BioCarbon personnel involved in such activities shall ensure that:

- (a) the recipient organization is legitimate, properly registered, and operates in accordance with applicable legal and ethical standards;
- (b) appropriate due diligence is conducted before any donation or sponsorship is approved; and
- (c) the contribution does not create or appear to create any improper advantage, influence, or preferential treatment.

## **Procedures for sponsorships, donations and community investments**

Where BioCarbon provides sponsorships, donations, or community support, the following requirements shall apply:

- (a) All such contributions shall be declared to and approved by the Compliance Officer prior to commitment or payment;
- (b) The Compliance Officer shall record approved contributions in the Sponsorship, Donations and Community Support Register;
- (c) Contributions that could reasonably be perceived as influencing program decisions, certification processes, validation or verification activities, procurement decisions, or regulatory interactions are strictly prohibited;

- (d) Prior to approval, BioCarbon shall conduct appropriate due diligence on the recipient organization, including verification of its legitimacy, governance structure, and potential conflicts of interest;
- (e) For higher-risk situations, additional checks may be conducted, including review of the organization's integrity policies, governance practices, and financial transparency;
- (f) All financial or in-kind contributions shall be accurately recorded and documented in accordance with BioCarbon's internal financial and compliance procedures;
- (g) Contributions shall be reasonable, proportionate, and transparent, and shall not create real or perceived undue influence;
- (h) The Compliance Officer shall monitor such contributions to ensure that they are used for their intended purpose and remain consistent with BioCarbon's ethical standards;
- (i) The Compliance Officer shall report periodically to senior management and the Board of Directors on donations, sponsorships, and related compliance controls.

### **13 Facilitation payments**

A facilitation payment refers to a small, unofficial payment or advantage provided to expedite or secure the performance of a routine administrative action to which the payer is already legally entitled.

Facilitation payments are widely recognized under international anti-corruption standards as a form of bribery and are prohibited under many national anti-corruption laws.

Such payments typically involve attempts to accelerate administrative procedures or obtain preferential treatment in routine processes.

For the purposes of this Policy, facilitation payments may include unofficial payments or advantages requested or offered in connection with administrative actions such as permits, regulatory authorizations, inspections, certifications, or other routine administrative procedures.

#### **Principles and Procedures for Facilitation Payments**

BioCarbon strictly prohibits facilitation payments in all activities conducted under its governance and programs.

No person acting on behalf of BioCarbon may offer, promise, give, request, or authorize any facilitation payment.

Where a BioCarbon representative is confronted with a request or demand for a facilitation payment, the individual shall:

- (a) decline the request and explain that BioCarbon policies prohibit such payments;
- (b) request documentation demonstrating that the payment is legitimate and supported by an official receipt or legal requirement;
- (c) immediately report the incident to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com).

In exceptional circumstances where an individual reasonably believes that their health, safety, or liberty, or that of another person, is at immediate risk, a payment may be made under duress.

In such cases:

- (a) the incident shall be reported to the Compliance Officer as soon as possible, and
- (b) full details of the circumstances shall be documented.

The Compliance Officer shall:

- (a) record the incident in the Facilitation Payments Register;
- (b) review the circumstances surrounding the event;
- (c) determine whether additional internal measures or external reporting are required.

Where appropriate, the matter may be reported to relevant authorities in accordance with applicable laws and regulations.

All payments, including those made under exceptional circumstances, shall be accurately documented in BioCarbon's financial and compliance records.

## **14 Reporting actual/suspected misconduct**

The prevention, detection, and reporting of bribery, corruption, and conflicts of interest are essential elements of BioCarbon's integrity framework.

All persons and entities subject to this Policy, including BioCarbon personnel, collaborators, Conformity Assessment Bodies (CABs), and other relevant third parties, share responsibility for identifying and reporting suspected misconduct.

Any person who becomes aware of, or reasonably suspects, an act of bribery, corruption, fraud, or conflict of interest shall report the matter without undue delay through BioCarbon's Ethics and Compliance Channel: <https://canaletico.es/en/biocarbonstandard>.

Reports may relate to actual misconduct, suspected misconduct, or circumstances that may reasonably give rise to concerns regarding integrity or compliance with this Policy.

Failure to report known or suspected violations may constitute misconduct and may lead to disciplinary or contractual measures where applicable.

BioCarbon strictly prohibits any form of retaliation, harassment, or intimidation against individuals who report concerns in good faith.

All reports shall be handled confidentially and in accordance with the procedures established in the Whistleblowing Policy and Internal Investigations Manual.

The Compliance Officer is responsible for receiving, assessing, and managing reported concerns and for ensuring that appropriate investigation procedures are followed while safeguarding the principles of confidentiality, impartiality, and protection of reporting persons.

Reports may be submitted anonymously where permitted by applicable law.

## **15 Follow-up**

This Policy establishes the controls, procedures, and measures implemented by BioCarbon to prevent, detect, and mitigate risks related to fraud, corruption, and bribery, and to ensure compliance with the BioCarbon Code of Ethics, applicable anti-corruption laws, and internationally recognized integrity standards.

The effectiveness of these measures shall be monitored through periodic compliance reviews and internal oversight processes designed to ensure that the controls established in this Policy remain appropriate, effective, and consistently applied.

The Compliance Officer is responsible for overseeing the monitoring, assessment, and continuous improvement of the Anti-Corruption framework and related procedures.

Anti-Corruption risk assessments shall be conducted and periodically reviewed in accordance with the procedures established in the Compliance Officer Manual.

Where necessary, improvements or corrective measures shall be implemented to strengthen the effectiveness of BioCarbon's integrity and compliance controls.

## 16 Training

BioCarbon promotes a culture of integrity and ethical conduct through the provision of training and awareness activities related to anti-corruption and compliance obligations.

Training shall be provided to relevant personnel in order to ensure that individuals involved in BioCarbon activities understand applicable anti-corruption laws, integrity standards, and the requirements established in this Policy.

The Compliance Officer shall be responsible for coordinating and overseeing the development and delivery of Anti-Corruption training programs. Training materials shall be aligned with the provisions of this Policy, BioCarbon's Code of Ethics, and applicable legal and regulatory requirements.

The Compliance Officer shall maintain records of training activities and document their completion in accordance with the procedures established in the Compliance Officer Manual.

Anti-Corruption training shall be conducted on a periodic basis and shall typically cover:

- (a) the BioCarbon Code of Ethics;
- (b) the BioCarbon Anti-Corruption Policy and Procedures;
- (c) conflict-of-interest management;
- (d) reporting mechanisms and whistleblowing procedures; and
- (e) relevant legal and regulatory requirements applicable to BioCarbon activities.

Through these training activities, BioCarbon seeks to ensure that all persons and entities participating in its programs understand their responsibilities and contribute to maintaining the highest standards of integrity, transparency, and ethical conduct.

## 17 Penalties and sanctions

Any breach of this Policy or of applicable anti-corruption laws and regulations may result in disciplinary measures or other appropriate actions.

Such measures may include:

- (a) suspension of functions or assignments;
- (b) termination of contractual or professional relationships;
- (c) referral to relevant authorities where required by applicable law.

All persons and entities subject to this Policy are responsible for complying with its provisions and for seeking guidance from the Compliance Officer where clarification is required.

Failure to comply with this Policy may result in corrective or disciplinary measures in accordance with applicable laws, contractual obligations, and BioCarbon's internal governance procedures.

## 18 Related documents

This Anti-Corruption Policy and Procedures shall be interpreted in conjunction with:

- (f) The Code of Ethics;
- (g) The Impartiality Management Policy;
- (h) The BioCarbon Governance Framework;
- (i) The Long-Term Management Plan;
- (j) The Procurement Policy and Third-Party Due Diligence Procedures
- (k) The Compliance Officer Manual, and
- (l) The Whistleblower Policy and Internal Investigation Manual

In matters concerning institutional independence, financial safeguards, conflict-of-interest management, and governance integrity, the strictest applicable provision shall prevail.

Where inconsistencies arise, priority shall be given to provisions safeguarding environmental integrity, decision-making impartiality, and institutional independence.

Any queries about this Policy shall be directed to the Compliance Officer at [compliance.officer@biocarbonstandard.com](mailto:compliance.officer@biocarbonstandard.com) or submitted through our Ethics and Compliance Channel (<https://canaletico.es/en/biocarbonstandard>).

**Artículo II. COMMUNICATION AND ACCEPTANCE FORM**

I hereby confirm that I have received, read, and understood the BioCarbon Anti-Corruption Policy and Procedures in its entirety.

I acknowledge and accept the principles, responsibilities, and procedures established in this Policy and commit to complying with its provisions in the performance of my duties and activities related to BioCarbon programs.

I understand that I am required to:

- (a) act in accordance with the ethical and integrity standards established in this Policy;
- (b) promptly disclose any real, potential, or perceived conflict of interest in accordance with the procedures set out herein; and
- (c) report any suspected or actual misconduct, corruption, bribery, or conflict of interest through the Ethics and Compliance Channel or to the Compliance Officer.

I further acknowledge that failure to comply with this Policy may result in disciplinary or contractual measures, as well as other actions in accordance with applicable laws and BioCarbon's internal governance procedures.

By signing this form, I confirm my acceptance of this Policy and my commitment to uphold the highest standards of integrity, transparency, and ethical conduct in all activities associated with BioCarbon.

Signature:	
Name:	
Date:	

### Artículo III. Annex 1. Gift and Hospitality Disclosure Form

#### Section 1: Recipient's Details

Recipient's Details	
Name:	
Position:	
Department/Division/Branch:	

#### Section 2: Details of Gift/Hospitality Offered or Received

Details of Gift/Hospitality Offered or Received	
Description:	
Business or professional purpose of the interaction:	
Name of Donor:	
Relation between Donor and Recipient:	
Estimated Value:	
Date of Offer/Reception:	
Disposal: What was done with the Gift/Hospitality?	

#### Section 3: Declaration by the Recipient /Offeror's Disclosure

I have not withheld any relevant information and declare that the information provided in this disclosure form is, to the best of my knowledge, true at time of disclosure.	
Signature of recipient/offeror:	

**Section 4: To be completed by the Compliance Officer**

Decision:	
Any other comments:	
Date of the registration of the gift/hospitality in the Gift Register:	
Name:	
Signature:	
Date:	

I declare that the information provided in this form is accurate and complete.

### Artículo IV. Annex 2. Conflict Of Interests Declaration Form

This form shall be completed upon appointment to relevant functions or whenever a potential conflict of interest arises.

1. Personal Details	
Name:	
Position / Role:	
Organization (If applicable):	
Date of declaration:	
2. The Situation	
Matter or activity under consideration:	
Expected roles/Duties to be performed in dealing with this matter:	
3. Private Interests	
Do you or any member of your immediate family have any direct or indirect financial, professional, or personal interest related to this matter?	<input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, please describe the interest:
Do you have any professional, advisory, or financial relationship with any entity involved in this matter?	<input type="checkbox"/> Yes <input type="checkbox"/> No  If yes, please describe the interest:
4. Declaration by the individual	
I declare that the information provided in this form is complete and accurate to the best of my knowledge.	

I understand that any real, potential, or perceived conflict of interest must be disclosed in accordance with the BioCarbon Anti-Corruption Policy and Procedures.

Where a conflict of interest exists, I acknowledge that I may be required to refrain from participating in the relevant activity or decision-making process.

Date:	
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Signature:	
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I have declared my interests and hereby abstain from participation in the above process.

Date:	
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Signature:	
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Compliance Officer determination:

No conflict identified

Potential conflict – mitigation measures required

Conflict identified – recusal required:

Comments / Observations:

Mitigation measures (if applicable):

Final decision

Participation authorized

Participation authorized with mitigation measures

Recusal required

Compliance Officer Name:
Signature:
Date:

## Artículo V. Annex 3. Annual Conflict of Interest Declaration Form

Please reply with YES/NO and provide details if needed.

### 1. Financial Interest Related to BioCarbon Programs

Do you or any member of your immediate family hold any financial or non-financial interests (direct or indirect) in any entity participating in BioCarbon programs?

YES  NO

If yes, please provide details:

### 2. Professional Relationships

Do you or any member of your immediate family have professional, advisory, consulting, or employment relationships with any entity participating in BioCarbon programs?

YES  NO

If yes, please provide details:

### 3. Business Relationships

Have you or any member of your immediate family entered into business relationships or transactions with any entity participating in BioCarbon programs outside normal market conditions?

YES  NO

If yes, please provide details:

### 4. Gifts and Hospitality

Have you or any member of your immediate family received gifts, hospitality, or other benefits from any entity participating in BioCarbon programs that exceed the threshold defined in the Anti-Corruption Policy and that have not been reported to the Compliance Officer?

YES  NO

If yes, please provide details:

## 5. Governance or Decision-Making Roles

Do you currently hold any governance, fiduciary, advisory, or decision-making role in any entity participating in BioCarbon programs?

YES  NO

If yes, please provide details:

## 6. External Activities

Are you currently engaged in external professional or business activities that could create a real, potential, or perceived conflict of interest with your role in BioCarbon?

YES  NO

If yes, please provide details:

## 7. Integrity and Professional Conduct

To the best of your knowledge:

Are you currently subject to any investigation or disciplinary procedure that could affect your suitability to perform duties under BioCarbon programs?

YES  NO

If yes, please provide details:

## 8. Compliance Confirmation

Do you confirm that you comply with the following:

- (a) BioCarbon Code of Ethics
- (b) BioCarbon Anti-Corruption Policy and Procedures
- (c) BioCarbon Conflict-of-Interest requirements

YES  NO

## Declaration

I declare that the information provided in this Annual Declaration is complete, accurate, and true to the best of my knowledge.

I understand that the purpose of this declaration is to ensure the independence, impartiality, and integrity of BioCarbon programs.

I acknowledge that any real, potential, or perceived conflict of interest must be disclosed immediately in accordance with the BioCarbon Anti-Corruption Policy and Procedures.

NAME

POSITION

SIGNATURE

DATE

## **Artículo VI. Annex 4. Annual Declaration Form - Conformity Assessment Bodies (CABs)**

This declaration shall be completed upon engagement with BioCarbon, annually thereafter, and whenever material changes occur affecting the independence or impartiality of the CAB.

Please answer YES/NO and provide details where applicable.

### **1. Independence and Conflicts of Interest**

Does the CAB, its shareholders, directors, senior management, or key personnel have any financial or non-financial interest (direct or indirect) in BioCarbon?

YES  NO

If yes, please provide details:

Does the CAB ensure that personnel assigned to BioCarbon activities are free from conflicts of interest in relation to the evaluated project or entity?

YES  NO

If yes, please provide details:

Does the CAB, its shareholders, directors, senior management, or key personnel have any financial or non-financial interest (direct or indirect) in any entity validated/verified or project registered under the BioCarbon programs? (Click [here](#) for a list of GHG Crediting Program users, [here](#) for a list of Biodiversity Crediting Program users and [here](#) for a list of Water Crediting Program users).

YES  NO

If yes, please provide details:

Do any directors, shareholders, senior managers, or key personnel of the CAB, or any of their immediate family members, hold financial interests, advisory roles, or fiduciary relationships with any project holder, developer, broker, or entity promoting or dealing in offset credits that the CAB is assigned to evaluate under BioCarbon programs?

YES  NO

If yes, please provide details:

To the best of your knowledge, does any member of the team assigned to activities under BioCarbon have financial or non-financial interests in evaluated entities or registered projects?

YES  NO

If yes, please provide details:

Has the CAB provided consultancy services, technical advisory, project design, documentation preparation, or assistance in obtaining validation/verification to any entity or project that was subsequently evaluated under BioCarbon programs?

YES  NO

If yes, please provide details:

Has the CAB maintained commercial relationships with any evaluated entity under conditions other than normal market terms?

YES  NO

If yes, please provide details:

Is there any significant financial dependence on BioCarbon or on an evaluated entity that could compromise the CAB's independence?

YES  NO

If yes, please provide details:

Does the CAB or any member of the evaluation team currently hold signing authority, representation powers, governance roles, fiduciary positions, or similar responsibilities with respect to any entity evaluated under BioCarbon programs?

YES  NO

If yes, please provide details:

Is there any current or potential circumstance that could affect the CAB's independence, objectivity, or impartiality in relation to BioCarbon or evaluated entities?

YES  NO

If yes, please provide details:

## 2. Gifts, Hospitality and Benefits

Has the CAB or any assigned team member received gifts or benefits from any user, evaluated entity, or entities participating in BioCarbon programs exceeding USD 70 (or the applicable internal threshold) that were not declared and approved in accordance with internal procedures?

YES  NO

If yes, please provide details:

To the best of your knowledge, has any member of the evaluation team accepted hospitality or entertainment that could create a threat to impartiality?

YES  NO

If yes, please provide details:

Has the CAB provided gifts, hospitality, or benefits to evaluated entities under the BioCarbon programs beyond normal professional courtesy?

YES  NO

If yes, please provide details:

## 3. Organizational Impartiality and Regulatory

Does the CAB have a formal mechanism for identifying, analyzing, and mitigating threats to impartiality?

YES  NO

If yes, please provide details:

Does the CAB maintain structural separation between conformity assessment activities and consultancy activities?

YES  NO

If yes, please provide details:

Is the CAB in compliance with its internal policies on:

- (a) Confidentiality
- (b) Anti-bribery and anti-corruption
- (c) Conflict of interest management
- (d) Personal data protection?

YES  NO

If yes, please provide details:

Has the CAB been subject to suspension, limitation, sanction, or formal warning by its accreditation body within the last five (5) years?

YES  NO

If yes, please provide details:

Is the CAB currently subject to any regulatory, disciplinary, or accreditation investigation that could affect its suitability to operate under the BioCarbon programs?

YES  NO

If yes, please provide details:

Within the last ten (10) years, has the CAB or its senior management been subject to insolvency, bankruptcy, or similar proceedings that could affect operational stability?

YES  NO

If yes, please provide details:

Has the CAB or its senior management been convicted of any criminal offense that could affect professional suitability?

YES  NO

If yes, please provide details:

Has the CAB or its senior management been disqualified by a competent authority from acting in a managerial or supervisory capacity in any organization?

YES  NO

If yes, please provide details:

## 5. Adherence to BioCarbon Principles

Does the CAB declare that it is aware of and complies with the BioCarbon Code of Ethics insofar as applicable to its contractual relationship and activities under the programs?

YES  NO

If yes, please provide details:

Does the CAB declare that it complies with the BioCarbon Anti-Bribery and Anti-Corruption Policy, or maintains an equivalent policy aligned with internationally recognized standards?

YES  NO

If yes, please provide details:

Does the CAB undertake to immediately report to BioCarbon any suspected conflict of interest, misconduct, or act of corruption related to activities under the BioCarbon programs?

YES  NO

If yes, please provide details:

## 6. Final Declaration

The undersigned, acting on behalf of the Conformity Assessment Body (CAB), declares that the information provided in this Form is complete, accurate, and true to the best of their knowledge and belief.

The CAB acknowledges that:

- (a) It has diligently assessed any real or potential threats to its independence, objectivity, and impartiality.
- (b) It maintains appropriate controls to safeguard its professional integrity.
- (c) Its participation in the BioCarbon programs is conditional upon the ongoing maintenance of independence, impartiality, and integrity standards.
- (d) It will immediately notify BioCarbon of any material change affecting the responses provided herein. The CAB further confirms that it will maintain effective internal procedures to identify and manage threats to independence and impartiality in activities conducted under BioCarbon programs.
- (e) Any omission or false statement may result in contractual measures, suspension, or termination of participation in the BioCarbon programs.

Furthermore, the CAB understands that personal data contained in this Declaration may be processed by BioCarbon for legal, regulatory, and contractual compliance purposes in accordance with applicable data protection laws.

NAME

POSITION

SIGNATURE

DATE