

Anti-bribery and corruption policy

Governance



BeZero

Please direct any questions regarding this Policy to the COO if you have concerns about this Policy and how it applies to you.

Introduction

BeZero Carbon have a duty of care towards our team members. However, it is necessary that, as with any successful community, each individual takes a share of responsibility towards the group as a whole.

BeZero Carbon conducts all business honestly and ethically. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our dealings wherever we operate.

We are also committed to implementing and enforcing effective systems to counter bribery.

This policy covers the steps that BeZero takes to mitigate any perceived bribery and corruption attempts.

Scope

This policy applies to all BeZero staff, partners, and subcontractors.

Definition

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or advantage so to induce or influence an action or decision.

A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.

Bribery is not limited to the act of offering a bribe. If an individual is the recipient of a bribe and they accept it, they are also breaking the law.

Bribery is illegal. Subcontractors and all employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor).

Anti-bribery statement

BeZero, acting through its subcontractors, employees, and agents always strives to act fairly and honestly in all business dealings.

By rejecting bribery in any form, the BeZero reputation as an honest and transparent company is protected.

We have a zero-tolerance approach to bribery by our employees, subcontractors, and agents. Any breach of the Company's anti-bribery policy may be treated as gross misconduct and therefore, the

employees involved will be subject to our disciplinary process or the subcontractors involved will have service contracts terminated in addition to being reported to the appropriate authorities.

No individual associated with BeZero should accept bribes to any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from the COO.

Our policy

BeZero will take appropriate steps to ensure that:

- We do not, directly or indirectly, offer, promise, give, accept or demand a bribe or other undue advantage (including excessive gifts and hospitality) to obtain or retain business, or gain any other improper advantage.
- We do not offer, nor give in to demands, to make illicit or illegal payments to agents, subcontractors, public officials (at whatever level), or the employees of business partners or anybody else that we do business with.
- We engage and remunerate agents, our clients and other third parties only for legitimate services and adopt appropriate transparency in our approach.
- We promote awareness of, and compliance with, company policies against bribery and corruption during onboarding and periodic refresher communication.
- We raise awareness of the need to combat bribery and corruption with our employees, subcontractors, agents, and business partners by the publication of this policy and relevant contractual provisions to reduce the risk of bribery and corruption.

Gifts and hospitality

BeZero accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made to influence the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It follows local law.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g., a voucher or gift certificate).
- It is appropriate for the circumstances (e.g., giving small gifts around Christmas or as a small thank you to a company or individual for helping with a difficult or complex situation).
- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key influential person, clearly to directly influence them.
- It is not above a certain excessive value, as pre-determined by the COO (usually no more than £50).
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of a Co-Founder or COO.

Where it is inappropriate to decline the offer of a gift (i.e., when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the COO, who will assess the circumstances and record the gift.

Facilitation payments and kickbacks

BeZero does not accept and will not make any form of facilitation payments of any nature.

We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made to low-level officials to secure or speed up the performance of a certain duty or action.

BeZero does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

BeZero recognises that, despite our strict policy on facilitation payments and kickbacks, subcontractors or employees may face a situation where avoiding a facilitation payment or kickback may put them/their family's personal security at risk.

Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record of the payment.

Report the incident to the COO immediately who may report the incident to the appropriate authorities as necessary.

Conflicts of Interest

Conflicts of interest are where an individual has two or more interests (for example private and work-related) that compete.

An individual may, for example, use this to their advantage by taking customers from one business to another (from BeZero to a competitor) for financial gain, or their own gain. Another example may be where an employee or subcontractor has links with individuals responsible for tendering contracts, which may be perceived as an unfair advantage in the tender process.

BeZero staff must report any potential conflict of interest to the COO.

Updates and reviews

Version number	Date	Description
1.00	22/08/22	Initial release
1.01	01/02/24	Minor content updates
1.02	17/04/25	Review

Disclaimer

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