

ANTI-BRIBERY AND CORRUPTION POLICY

AUGUST 2025





INTRODUCTION

At NewClimate Institute (“NewClimate” or “the Organisation”), integrity is at the heart of everything we do. Anti-bribery and anti-corruption principles are a cornerstone of our Code of Conduct and a fundamental part of our organisational identity. This Anti-Bribery and Corruption Policy (“the Policy”) establishes NewClimate’s position, expectations, and internal procedures designed to prevent, detect, and address all forms of bribery and corruption. Its purpose is to foster a culture of integrity, transparency, and accountability across all our activities and to ensure that all organisational resources are used only for legitimate, ethical, and lawful purposes.

NewClimate strictly prohibits the misuse of funds for bribery, corruption, money laundering, terrorist financing or any other unlawful activities. The Policy is reviewed regularly and approved by the management team of the Organisation to ensure alignment with legal requirements and best practices.

POLICY STATEMENT

NewClimate maintains a zero-tolerance stance towards all forms of bribery and corruption. All employees, associates and partners must:

- Act with honesty, fairness and integrity in every professional interaction;
- Never offer, promise, give, solicit, or accept any bribe, facilitation payment or improper advantage; and
- Comply fully with the letter and spirit of all applicable anti-bribery, anti-corruption and related legislation in every jurisdiction in which NewClimate operates.

NewClimate will not tolerate any conduct that seeks to secure a business or personal advantage through improper or unlawful means, nor the use of organisational funds to:

- Promote or support violence or terrorism;
- Engage in or facilitate money laundering; or
- Provide financial or material support to any sanctioned entity or individual
- Misappropriate resources for personal or unauthorized use.

PROHIBITED CONDUCT

Under this Policy, the following acts are strictly prohibited:

- Offering, giving, requesting or accepting bribes, kickbacks or inducements of any kind;
- Making or accepting facilitation payments, regardless of local custom;
- Providing or accepting excessive or inappropriate gifts, hospitality or entertainment intended to improperly influence decision-making;
- Misappropriating or diverting grant funds or organisational assets for personal use or unauthorised purposes;
- Engaging with or supporting any entity or individual known to be involved in terrorism, money laundering, or sanctions violations;
- Concealing, falsifying or altering accounting records to disguise corrupt practices or improper transactions.

While modest and culturally appropriate gifts or hospitality may be acceptable under specific circumstances, such gestures must always be transparent, lawful and proportionate and must not create any perception of impropriety. Cash or cash equivalents are strictly prohibited.

LEGAL COMPLIANCE

NewClimate is committed to full compliance with all anti-bribery and anti-corruption laws applicable to our operations, including relevant provisions of the German Criminal Code (Strafgesetzbuch).

Where required by contractual obligations or international cooperation, our policy also recognizes the principles and prohibitions outlined in global standards such as any EU directives, the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act (FCPA). In case of cross-border activities or specific project requirements, additional compliance measures may be implemented to ensure alignment with international standards.

SCOPE AND RESPONSIBILITIES

This Policy applies to:

- All employees (permanent, temporary or part-time);
- Interns, volunteers, and student workers;
- Contractors, consultants, suppliers, sub-grantees and other third parties acting on behalf of or representing NewClimate.

It covers all organisational activities, projects and transactions, regardless of geographic location.

Management team is responsible for leading by example, embedding a culture of integrity and ensuring that effective systems are in place to prevent and detect bribery and corruption.

All members of staff are required to read, understand and comply with this Policy. Updates or amendments will be communicated promptly to all relevant parties.

COMPLIANCE, REPORTING AND ENFORCEMENT

NewClimate encourages a culture of openness and accountability. Any individual who becomes aware of or suspects a violation of this Policy is strongly encouraged to report it immediately through the Organisation's confidential whistleblowing channel.

All reports will be handled promptly, fairly and with strict confidentiality. Retaliation or victimisation against any person who raises a concern in good faith is strictly prohibited.

In the event that any employee, partner or affiliate receives a request or demand for an undue financial or other advantage related to any organizational activity,

this must be reported immediately both internally and, where required, directly to appropriate oversight bodies or funders. Violations of this Policy will result in disciplinary action, up to and including termination of employment or contract. The Organisation reserves the right to terminate relationships with third parties or grantees found to be in breach. Where appropriate, matters may be reported to

COMMITMENT TO CONTINUOUS IMPROVEMENT

NewClimate already integrates important compliance activities such as due diligence for partners within the scope of its projects. As the organization evolves, we aim to continue strengthening our broader compliance framework at a pace that aligns with our operational capacity and resources. This may include gradual enhancements in risk awareness, policy development, controls and training over time.

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