

# Anti-Corruption, Bribery, and Money Laundering Group Policy

## INTRODUCTION

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NetZero® is a climate venture specialising in long-term carbon removal from the atmosphere. We turn agricultural residues into biochar, a very stable form of carbon used as a soil amendment. NetZero's mission is to bring biochar at scale in the tropics – for climate and people, now.

Our main business commitments are: (1) to make sure we do **not contribute to tropical deforestation**, (2) to **maximize social and environmental co-benefits**, and (3) to only sell carbon credits to **clients with very serious net-zero commitments**.

Following our founders' vision and the company's mission, we are proud to implement this policy, which reflects NetZero's firm commitment to follow high ethical standards and to comply with laws, rules, and regulations designed to combat all forms of corruption, bribery, and money laundering, in all countries we do business in.

We understand we can make a positive contribution by being present in multiple geographies and cultures, by following our standards and reaffirming our positions on the prevention of corruption, bribery, and money laundering when our activities, employees, or business partners are concerned. Commercial or individual considerations never take precedence over the group's commitment to combatting such crimes.

## STATEMENTS AND DIRECTIVES

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NetZero and its employees must comply with European law with respect to anti-corruption, bribery, and money laundering, as well as all the equivalent laws in the respective host countries where NetZero is doing business. NetZero worldwide statements with respect to anti-corruption, bribery, and money laundering are simple, direct, and clear:

- 1. NetZero does not offer or accept neither bribes nor kickbacks to anybody, anytime, in any form.**
- 2. NetZero does not practice, participate, or accept any form of money laundering.**
- 3. NetZero does not tolerate corruption in connection with any of its business dealings.**

Additionally, NetZero's Board of Directors requires that each employee act ethically and lawfully in all business dealings when producing, selling, buying, or representing NetZero in any capacity or situation. Violation of any of these statements and directives is considered by NetZero as a serious fault, and in many cases is also a violation of law. Involvement in any type of bribery, corruption, or money laundering can result in lasting damage to our brand and our reputation. It can also result in severe fines and penalties, plus jail time for participants.

**Compliance with this policy is mandatory.** Failure to comply may result in disciplinary action up to termination of employment or termination of business relationship.

## DEPLOYMENT AND TRAINING

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This policy, its statements and directives must be deployed through specific standards and training sessions, in all countries where NetZero does business, to all employees and direct subcontractors, where appropriate.