

## Anti-Bribery & Corruption Policy

### Policy Statement

People's Planet Project (hereafter 'PPP') does not tolerate any form of corruption, and strictly prohibits any form of bribery, including both offering bribes and accepting bribes. We are committed to upholding systems, procedures and practices that reduce the risk of and exposure to bribery and corruption, including forms such as fraud, theft, nepotism, conflicts of interest, money laundering, extortion, or any other financial crime. PPP is committed to conducting work in accordance with all applicable laws and regulations.

The purpose of this Policy is to elucidate the details of what constitutes bribery and corruption and how PPP guards against bribery and corruption, as well as provide a guide to combating bribery and corruption within the organization. As a non-profit organization handling funds that come primarily in the form of grants and donations and carrying out activities in countries worldwide, PPP recognizes that it is exposed to financial and ethical risks related to improper handling of finances. We aim to avoid and minimize these risks to the greatest extent possible, in order to ensure that PPP operates in an ethical and responsible manner, and in line with our values of integrity, transparency, and commitment to human rights.

### Scope

This Policy applies to all PPP staff, volunteers, and its Board of Directors, as well as third parties considered partners, beneficiaries, etc., who in this Policy will be referred to as PPP personnel.

### Definitions

- Bribery: the offering, promising, giving, accepting or soliciting of money, gifts or other advantage in exchange for goods or services that are illegal or a breach of trust.
- Bribe: an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.
- Corruption: the abuse of power or influence for private gain.
- Facilitation payments: bribes or small unofficial payments offered or given to a government official, agent, or representative with the goal of 'facilitating' or expediting the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement.
- Kickbacks: bribery where payment is received in exchange for illegal services.

- Gifts & hospitality: These include both small and large gifts, including for example such things as small mementos, meals, holidays, and other gifts.

## Policy

All forms of bribery are strictly prohibited. PPP personnel may not engage in bribery, either directly or via a third party.

It is not acceptable to:

- a) give, promise to give, or offer a payment or other advantage with the expectation that the receiving party will provide an advantage in return;
- b) accept a payment or other advantage from a third party with the expectation that it will lead to a business advantage for them;
- c) give, promise to give, or offer facilitation payments;
- d) act in any way that could be perceived as engaging in bribery or corruption.

If you are asked to make a payment on PPP's behalf, you should always consider what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, these should be directed to the Head of Operations.

PPP and PPP personnel must not offer any gifts or hospitality to third parties. In particular, PPP personnel must not offer any gifts or hospitality which could be regarded as improper or illegal, or which violate any policies or laws. As PPP is funded via grants and donations, there are no situations where it is appropriate to use these funds for gifts or hospitality for third parties.

PPP will not make donations, in cash or kind, or provide support for political parties or political candidates.

## Responsibilities: Record-keeping and Reporting

All PPP personnel must read, understand, and comply with this Policy.

In order to comply with this Policy and reduce the risk of corruption, PPP personnel will keep proper and adequate financial records for the receipt and use of all funds, as well as of financial decisions made. Properly kept records facilitate transparency and accountability, to partners, beneficiaries, donors, and the general public, in addition to reducing the risk of bribery and corruption.

All of PPP's funds and expenses will be used appropriately, with full evidence of business reason accompanying the use and receipt of all funds. All accounts, invoices, records, and other documents should be prepared with strict accuracy and completeness. No accounts will be kept "off-book".

The prevention, detection, and reporting of violations or suspected violations of this Policy is the duty of PPP personnel. Any suspected violation or suspicion of malpractice

should be reported to the Head of Operations at the earliest time possible, following the guidelines from section 'Whistleblowing'. These reports should be made as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

If you are unsure about whether a practice constitutes bribery or corruption, or have any queries about this Policy or other ethical concerns, these can be raised with the Head of Operations.

Any violations of this Policy can result in disciplinary action, including dismissal, and are subject to law.

## Whistleblowing

If anyone suspects that bribery or corruption has taken place, they must report it without delay to the Head of Operations. This reporting channel is open for use by all PPP personnel and related third parties. The report can be made via email to:

[info@peoplesplanetproject.org](mailto:info@peoplesplanetproject.org) and/or [report@peoplesplanetproject.org](mailto:report@peoplesplanetproject.org)

Please include as much information and as many details as possible within reports, in order to increase the chances of an effective investigation and appropriate actions taken in response to the report. Detailed reports of actual and suspected violations also helps PPP to strengthen its anti-corruption and accountability processes, so as to decrease future risks as well.

Reports and the identity of those who filed a report will be kept strictly confidential. Reports and investigation documents will be handled on a legitimate and need-to-know basis. Details will only be shared with others as necessary for investigations to be carried out.

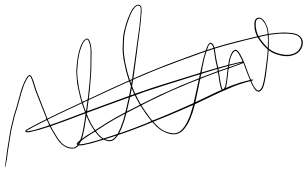
There will be no retaliation against or harassment of anyone who has reported reasonably held suspicions of bribery or corruption, and made a report in good faith. Reports made in good faith will not be subject to any disciplinary or similar actions even if no wrongdoing is found after investigation. Any form of retaliation should also be reported to the Head of Operations. Retaliation refers to any detrimental treatment, including dismissal, disciplinary action, threats, harassment, or other unfavourable treatment connected with raising a concern.

## Oversight

This Policy is the responsibility of PPP's Board of Directors.

Signed

On behalf of the Board of Directors

A handwritten signature in black ink, appearing to be 'Abdel Mandili', written in a cursive style.

**Abdel Mandili**  
**Founder & Executive Director**