

# in support of the Foundation Development and Climate Alliance

#### **Preamble**

When the United Nations adopted the 17 Sustainable Development Goals (SDGs) of the 2030 Agenda and the Paris Agreement in 2015, the international community laid the foundations for a global shift toward sustainability.

One of the key goals to avert the climate crisis endorsed by the Glasgow Climate Pact in 2021 is to limit the rise in the average global temperature to well below 2 degrees Celsius above pre-industrial levels, and efforts are to be made to limit the temperature rise to 1.5 degrees Celsius.

To ensure that these goals can still be achieved worldwide, not only government actors but also all private actors must live up to their climate responsibility and implement their own ambitious climate-protection goals as quickly as possible.

By amending the Climate Protection Act, Germany's Federal Government has also strengthened climate protection targets and firmly established the goal of greenhouse-gas neutrality by 2045. As early as 2030, emissions are to be cut by 65 percent compared to 1990.

The Alliance for Development and Climate is committed to ensuring that all actors recognize their responsibility and implement strategies that make the most effective contribution possible to achieving global climate protection targets and strive for a holistic transformation towards sustainability while involving countries of the Global South.

### **Declaration of participation**

With this declaration, we affirm our willingness to support the goals of the Alliance for Development and Climate and, together with other supporters, contribute to the achievement of the climate protection and sustainability goals.

In particular, we acknowledge the following points:

- 1. We support the Sustainable Development Goals (SDGs) of the 2030 Agenda and the Paris Agreement and strive to make the most effective contribution possible to achieving them.
- 2. To accomplish this, we commit to develop a holistic climate-protection strategy aimed at avoiding and reducing greenhouse-gas emissions as quickly as possible. With regard to currently unavoidable greenhouse-gas emissions, we commit to invest in high-quality offsetting projects (offsetting, insetting, financial contributions, adaptation) in order to effectively promote development impacts and international climate protection. For the development of our climate protection strategy and the use of offset projects, we shall be guided by the corresponding lists of criteria issued by the Foundation Alliance for Development and Climate.
- 3. As part of the Alliance for Development and Climate's annual survey (3rd quarter), we shall provide information on our climate protection targets and their implementation status. This includes in particular the funded projects, the achieved development impacts (SDGs), as well as the CO2e impact.
- 4. In our networks, we shall promote others to participate in the Alliance and will make our commitment to development and climate known.
- 5. The Foundation may publicise our support for the Alliance and use our logo to do so. We shall refer in appropriate ways to our supporter status and use the logo "Supporter of the Alliance" whenever the opportunity arises.



# **Organisation**

Information about your organisation					
Organisation Name*:					
General email address of	your org	ganisation*:			
General telephone numb	er of you	ur organisation*:			
Website:					
Categorisation of your or	ganisati	ion			
	Samsac			T 1 6 6 16	
Economic Sector*:		Business Services		Trade, Craft and Commerce	
		Basic Industry		Producing Industry	
Stakeholder group*:		Company		Science and Educational Institution	
		Association / Union		Public Administration	
		(national) NGO / Social Movement /		Municipality	
		Initiative / etc.		Other:	
		International Organisation			
Legal form:		AG (Aktiengesellschaft)		GP (General Partnership)	
	\\\\	<ul> <li>□ AdöR (Anstalten des öffentlichen Rechts)</li> <li>□ BV (Besloten Vennootschap met beperkte Aansprakelijkheit)</li> </ul>		gUG (gemeinnützige UG)	
				KG (Kommanditgesellschaft)	
				KGaA (Kommanditgesellschaft auf	
		Corp. (Corporation)		Aktien)	
		CV (Commanditaire vennootschap)		KdöR (Körperschaft des öffentlichen Rechts)	
		eG (Eingetragene Genossenschaft)	B	KLG (Kollektivgesellschaft)	
		e.V. (eingetragener Verein)	Á	KmG (Kommanditgesellschaft)	
		e. K. (Einzelunternehmer)		LLC (Limited Liability Company)	
		Foundation		LP (Limited Partnership)	
		SE (Europäische Aktiengesellschaft)		Ltd. (Limited Partnership)	
		gAG (gemeinnützige AG)		Ltd. (Private Company Limited	
		GbR (Gesellschaft bürgerlichen Rechts)  GmbH (Gesellschaft mit beschränkter Haftung)		by Shares)	
				n.e.V. (nicht eingetragener Verein)	
				NV (Naamloze Vennootschap)	
		gGmbH (gemeinnützige GmbH)		OG (Offene Gesellschaft)	
		GmbH & Co. KG (Gesellschaft mit beschränkter Haftung & Compagnie		OHG (Offene Handelsgesellschaft)	
		Kommanditgesellschaft)		PartGG (Partnerschaftsgesellschaft)	

<sup>\*</sup> mandatory



# **Organisation**

		SA (Société anonyme)		S.R.L. (Sociedad de Responsabilidad	
		SARL (Société à responsabilité limitée)		Limitada)	
		S.C. ( Sociedad Comanditaria)		UG (Unternehmergesellschaft haftungsbeschränkt)	
		SCS (Société en commandite simple)		VOF (Vennootschap onder firma)	
		SNC (Société en nom collectif)		Other:	
		S.R.C. (Sociedad Regular Colectiva)			
Branch*:		Automobile		Agriculture, Forestry and Fisheries	
		Construction and Architecture		Food	
		Consulting		Mechanical Engineering	
		Education and Research		Media, Communication and Marketing	
	Ţ	Chemistry and Pharmacy		Furniture	
	ø	Service		Mobility	
		Retail and Wholesale Trades		Sustainability, Climate and	
		Electrical and Electronics		Environmental Protection	
		Energy and Water Supply	9	Networks	
		Finance and Insurance	9	Paper and Printing	
		Development Policy		Law and Advocacy	
	5	Gardening and Landscaping		Recycling and Waste Disposal	
		Hospitality and Tourism		Raw Materials	
		Health and Social Services		Sport	
		Real Estate		Technology	
		Industry		Textile and Clothing	
		IT and EDP	P	Transport and Logistics	
	, 	Voluntary Carbon Market (VCM)	Ţ	Packaging	
		Consumer Goods		Public Administration	
		Culture and Entertainment		Certification	
				Other:	
Size of the organisation:		Micro organisation (up to 9 employees and	eithe	er less than € 2 million in revenues or	
Size of the organisation.	3	Micro organisation (up to 9 employees and either less than € 2 million in revenues or less than € 2 million in total assets).			
		Small organisation (from 10 to 49 employees and either from € 2 million to € 10 million in revenues or from € 2 million to € 10 million in total assets).			
		Medium-sized organisation (from 50 to 249 50 million in revenues or from € 10 million			
* mandatory		Large organisation (more than 250 employemillion combined with total assets of more			



# **Organisation**

\* mandatory

Organisation address*							
Street and house numb	er*:						
Address, additional info	rmation:						
Postal Code*:		City	City*:				
Country*:		Stat	te*:	*·			
Logo: Please send us yo	ur logo as a .jp	g or .png file to info@alliaı	nz-entwicklung-klima.de.				
Consents of the organi	sation						
Declaration of participa	tion*:	I agree to the declaration of Development and Climate A	of participation in support of the Alliance.				
Data privacy*:	X	I agree to the privacy policy Please find the privacy policy in					
Ethics Policy*:	X	I agree to the ethics policy. Please find the ethics policy in t					
Representation in the multi-actor overview:		the Alliance website and the supporters.	n's address will be publicly displayed on a visual ma at the name and logo will appear in the list of ima.de/en/the-alliance/current-supporters/	p on			
Newsletter:		notice - being stored and us	e organisation - as described in the data protection sed for sending the Allianz newsletter. It any time via the unsubscribe link in the newsletter	· ·			
How did you hear	☐ Person or	Company	☐ Events / Lecture / Webinar				
about us? *		edia / (online) Newspaper / / Literature dia	☐ Internet Research / Website ☐ Direct Contact / Mailing ☐ Other:				
For us to better evaluat you became aware of th			d be pleased to receive further information on h	OW			



# **Organisation**

illorillation about the	contact per	3011		
Form of address*:	☐ Mr.	☐ Ms.	other	
Academic title:	☐ Dr.			☐ Prof. Dr.
	Prof.			Other:
First name*:				
Last name*:				
Your email address*:				
Your telephone number	*:			
Ihre position:	-{	— <u> </u>		
Consent of the contact	person			
Data privacy*:	x I agre	ee to the privacy pol	icy.	
	Please	find the privacy policy	y in the attachment	t.
Newsletter:	I con	sent to my personal	data - as describ	ped in the data protection notice - being
	store		ing the Allianz ne	ewsletter. Unsubscribing is possible at any
Date	+	Signature		
		0		

### **PRIVACY POLICY**

For supporters of the Development and Climate Alliance on the storage and use of personal data by the Foundation Development and Climate Alliance.

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- As the protection of personal data is very important to the Foundation Development and Climate Alliance, we inform you here which personal data of yours are stored and what the data are used for.
- The data controller is the Foundation Development and Climate Alliance (foundation under public law).
   Registered office: Frankfurt am Main Business address: Chausseestrasse 22, 10115 Berlin, Germany Email: info@allianz-entwicklung-klima.de.
- The personal data provided within the framework of the Development and Climate Alliance (surname, first name, registered office/address, email address, telephone and mobile numbers, organisational affiliation, position, registrations, participations, photos), which are necessary for the purpose of managing the interested parties and supporters of the Alliance, are stored on servers within the European Economic Area and used for the purposes listed in the next point.
- The data will be used exclusively for the following purposes.
  - Contacting you and your institution for the purposes of sending information, requesting personal information and interests, invitations, registrations and notifications.
  - Recording of participation in events and use of personal data for registration and participation lists.
  - Passing on personal data within the circle of supporters and the organisational circle (BMZ – see below) for exchange and contact purposes.
  - Publication of company headquarters/address for location on the Alliance's actor map at
    www.allianz-entwicklung-klima.de (this does not include
    the addresses of private individuals).
- The legal basis for the processing is currently the Statement of Commitment in support of the Development and Climate Alliance
- The data will only be used for the purposes described in the Privacy Policy. Any other use will always be subject to renewed consent. Your data will not be used for advertising purposes.
- The Foundation Development and Climate Alliance as well as designated third parties (for information see below) secure the data by means of appropriate technical and organisational measures against accidental or intentional falsification, destruction, loss or access by unauthorised persons. Access to the personal data is restricted to those employees of the Foundation Development and Climate Alliance and the relevant designated third parties who need to process these data in accordance with the above-mentioned purpose(s) and who process the data properly and confidentially.
- The data will only be shared with the third parties named below. Should your data be shared with other third parties for the further fulfilment of the above-mentioned purposes, renewed consent will be required.
  - Federal Ministry for Economic Cooperation and Development (BMZ) as donor and cooperation partner of the Foundation

- AKRYL digital agency GmbH Agency for website hosting and support on behalf of the Foundation
- Mailjet GmbH Email marketing software for sending newsletters on behalf of the Foundation
- monday.com CRM software for supporter care on behalf of the Foundation
- Other cooperation partners of the Foundation Development and Climate Alliance who require the collected data exclusively for the fulfilment of the previously stated purposes.
- The aforementioned personal data shall be deleted when they are no longer necessary to achieve the purpose for which they were collected. This is the case if you no longer wish your personal data to be processed for the aforementioned purposes and therefore revoke your consent. In connection with your rights as a data subject, we explain how you can revoke your consent to data processing. In the event of revocation, you will no longer be able to benefit from the advantages of access to our extensive information offering, and the transfer of your personal data within the circle of supporters and organisations for exchange and contact purposes will no longer be possible.

#### Rights of data subjects

- You have the right to ask for your personal data, to have it rectified if necessary or to demand the restriction of processing or the erasure of the data. The data will then be erased. The permission granted to use the personal data can also be revoked at any time. The lawfulness of the processing up to the time of the revocation is unaffected by this.
- In the event of revocation, participation in further events and meetings as part of the Development and Climate Alliance will not be possible. Please send your revocation by email to info@allianz-entwicklung-klima.de.
- If you have any questions or complaints about this Privacy Policy or the data processing, you can contact the Foundation Development and Climate Alliance at the following email address: info@allianz-entwicklung-klima.de.
- You have the right to lodge a complaint with the data protection supervisory authority. The competent authority is the Federal Commissioner for Data Protection and Freedom of Information (BfDI).

#### **Declaration of Consent**

 I agree that my personal data may be collected, stored and used by the Foundation Development and Climate Alliance in accordance with the above Privacy Policy and may be passed on to the designated third parties for the fulfilment of the stated purposes.

This consent can be revoked by me in writing at any time and will be accompanied by the erasure of my data. A template for the revocation of consent will be provided upon request.

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#### A. Preamble

Dear readers,

The Foundation Development and Climate Alliance pursues the goal of promoting the voluntary offset market. It uses the funds acquired for development purposes, thereby contributing to fulfilling the 2030 Agenda and compliance with the Paris Climate Agreement.

As a foundation, we operate in a complex dynamic involving national and international private, public and non-profit actors. The different (organisational) cultures and the vulnerability of the beneficiaries in the countries of the Global South result in exacting demands on the conduct of all actors involved as well as on the structural organisation of our Foundation. In our endeavour to fulfil the aim of our Statutes for the long term and in line with our values, the Ethics Policy presented here contains rules and structures that are intended to ensure environmentally, socially and economically justifiable action.

The Ethics Policy is the basis of our actions as an organisation and is binding for all executive bodies and employees of the Foundation. Supporters, compensation and contractual partners, as well as service providers, are likewise urged to commit to the Foundation's principles in order to guarantee long-term collaboration.

The Ethics Policy brings together the applicable legislation, internal and external policies and voluntary commitments within a single document. Violations must be reported, documented and recompensed.

To this end, the Foundation Development and Climate Alliance shall ensure that all employees and contributors are made aware of the Ethics Policy, and that they agree with the principles and guidelines listed here.

Peter Renner

Chairman of the Board

Dr. Olivia Henke

**Dr. Olivia Henke**Member of the Board

### **B. Ethics Policy**

#### I. Goals

The Ethics Policy has the following goals:

- to manifest the Foundation's self-image,
- to create a uniform understanding of core rules of conduct among all employees of and contributors to the Foundation and thus to create a solid basis of trust,
- to define a clear requirement for the conduct of all employees and contributors,
- to inform third parties of the conduct they can expect from employees and contributors, and
- to specify existing contractual obligations.

#### II. Self-image and values

Since autumn 2018, the Foundation Development and Climate Alliance has pursued the goal of combining development cooperation and international climate action using the instrument of voluntary offsetting of greenhouse gases and mobilising additional funds to finance important development and climate action projects in developing and emerging countries. As a platform involving multiple actors, the Alliance is dedicated to voluntary contributions from companies, organisations, regional authorities and individuals. This primarily involves development contributions focused on the 17 Sustainable Development Goals (SDGs); secondly, it is a matter of ensuring positive effects on the climate from a balance sheet perspective (often known as CO2 offsetting).

The aim of the Alliance is to contribute to massively increasing the scope of voluntary offset payments with additional development impacts in countries in the Global South. In doing so, the organisation attaches great importance to recommending high-quality approaches, promoting a scientifically sound and humane view of CO2 offset-related issues and sustainable development, and acting as an authentic point of contact and provider of services for its members.

In order to secure and multiply the work of the Alliance in the long term and to give its work a solid, institutional foundation, in 2020 the organisation was transformed into a foundation. The Foundation was founded by the Kreditanstalt für Wiederaufbau (KfW) funding entity on behalf of the German Federal Ministry of Economic Cooperation and Development (BMZ).

The Foundation Development and Climate Alliance is a politically independent public foundation under civil law. The Foundation is based in Frankfurt am Main and its registered business address is in Berlin.

The Foundation's goals are:

- to promote development cooperation (Section 52 paragraph 2 number 15 AO / German Fiscal Code),
- to promote the conservation of nature, landscape management and environmental protection (Section 52 paragraph 2 number 8 AO),
- to promote science and research (Section 52 paragraph 2 number 1 AO) and

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• to promote education and the raising of children (Section 52 paragraph 2 number 7 AO).

These points reflect the core tasks of the Foundation, based on the following values:

- humanity,
- scientific character,
- quality,
- professionalism,
- service-orientation, and
- honesty.

#### III. Scope

#### 1. Personal scope

The Ethics Policy applies to

a) the Foundation's Executive Board and all employees of the Foundation irrespective of contractual employment status (e.g. employees, interns, external contractors) or the scope and location of the employment.

The Ethics Policy and its behavioural standards must be recognised as binding by all

- b) supporters,
- c) compensation partners
- d) contractual partners and service providers.

In the following, the persons listed under a) are referred to as 'employees' and those organisations/individuals listed under b) to d) are referred to as 'contributors'.

#### 2. Material scope

In order to establish the material scope of the Ethics Policy, it is necessary to determine who can and can't be involved with the Alliance.

#### a) Supporters

Support from the following organisations is excluded:

- producers of arms and strategic components for weapons,
- producers of tobacco products,
- producers of nuclear energy or manufacturers of core components for nuclear power plants,
- companies that produce or disseminate pornographic content,
- manufacturers of internationally banned chemicals,
- companies that conduct research on embryonic stem cells,
- companies, associations or organisations that have systematically or repeatedly attracted attention for violating civil, political, economic, social or cultural human rights,
- companies that have violated one of the four main principles

- of the International Labour Organization (ILO),1
- companies that violate national or international environmental legislation or minimum standards, and
- companies that have violated anti-corruption regulations, either once or repeatedly.

Likewise excluded are all entries on the EU financial sanctions list (EU CFSP – consolidated list of persons, groups and entities subject to EU financial sanctions). The current list can be viewed online on the EU Financial Sanctions Database – FSF platform via the following link: <a href="https://webgate.ec.europa.eu/fsd/fsf">https://webgate.ec.europa.eu/fsd/fsf</a>.

#### b) Donors/sponsors/benefactors

Companies that correspond to the categories listed in 2.a) are excluded from making donations, endowments or providing any form of financial support to the Foundation.

#### c) Compensation partners

To be admitted onto the Alliance's roster of compensation partners, a uniform set of criteria and standards applies. These are available to view online:

- Criteria and Standards for Admittance onto the Foundation Development and Climate Alliance's Roster of Compensation Partners and, in addition,
- Development and Climate Alliance: Approved Standards and Processes.

Compensation entities who want to join the Alliance must undergo an internal audit procedure by the Alliance's specialist team, which decides on their suitability as a partner to the Alliance.

The underlying criteria and standards are regularly checked and adjusted for quality assurance.

The following certificates or combinations of certificates are currently accepted by the Foundation:

- Gold Standard or Gold Standard for the Global Goals (GS VER/GS4GG),
- Verified Carbon Standard + Climate, Community & Biodiversity Standards (VCS + CCBS),
- Clean Development Mechanism + Gold Standard (CDM CER + GS),
- Fairtrade Climate Standard (GS VER + Fairtrade).
- Verified Carbon Standard + Social Carbon Standard (VCS + SCS), and
- Plan Vivo Certificates (PVC).

In the event that there are any changes to the Foundation's roster criteria, this list should be adjusted accordingly.

In addition to reducing emissions and sustainable development effects in line with the 2030 Agenda, projects run by compensation partners must fulfil the following requirements:

<sup>&</sup>lt;sup>1</sup> The International Labour Organization (ILO) is a specialised agency of the United Nations. The organisation's work focuses on formulating and enforcing international labour and social standards.

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- projects must not restrict or violate any fundamental rights of people in the project areas (e.g. human rights and/or the rights of indigenous peoples according to the UN Universal Declaration of Human Rights or the EU Charter of Fundamental Rights),
- project activities should not cause any negative impacts on people or the environment (the 'do no harm' principle),
- the climate and development impacts must be related in terms of content, space or institutions; the assembly of different components without such a connection is not permitted,
- projects must be exclusively located in developing and emerging countries,
- projects must be based on the following general principles: real, measurable, additional – this means that they would not be possible without funding via certificates – permanent, independently verified and unique, and
- 'leakage' should be avoided. This refers to a transfer of emissions saved in one area yet emitted in the same or greater quantity in another.

The Alliance is reluctant to exclude types of projects. Through approved standards and by the project developers involved, extensive precautions have already been taken at this point. However, based on the corresponding, slightly modified specifications of the UBA regarding offsetting on the part of the German government, the following project types are explicitly excluded:

- energy efficiency projects involving lighting schemes using bulbs that contain mercury,
- projects involving palm oil (unless the palm oil comes from certified, sustainable methods of production),
- projects involving geological CO2 sequestration,
- projects involving the destruction of trifluoromethane (HFC-23) and nitrous oxide (N2O) from adipic acid production, and
- projects associated with the extraction and processing of fossil fuels or in which mainly fossil fuels are used, excepting carbon capture and usage (CCU) projects, e.g. in the area of synthetic fuels (e-fuels) and energy efficiency measures in households.

The Ethics Policy applies worldwide.

### IV. Rules of conduct and consequences in the event of violations

#### 1. Rules of conduct

Rules of conduct apply to all employees of and contributors to the Foundation. In addition to individual behaviour, these rules also govern life within a supportive team culture where employees support and help each other as necessary. We place great value on honest dialogue in order to identify problems at an early stage – before they get worse or cause conflicts. Constructive feedback and assistance with errors, including the chance to correct these errors, are likewise key building blocks for a culture of open communication. This applies equally to communication with our supporters, donors, benefactors and partners.

#### a) Good corporate governance and professionalism

The Executive Board shall lead the Foundation on its own authority in line with the Foundation's goals. Board members together share responsibility for leading the organisation. The Chair of the Executive Board shall coordinate the work of the members of the Board. In addition, s/he will continually further the Foundation's strategic direction and ensure compliance with the legal provisions, the Ethics Policy and other compliance guidelines.

Foundation employees shall act in accordance with the organisation's self-image set out in Chapter II. Leaders shall also adhere to the leadership framework and to the strategy and transmit their values and goals to all employees. The Foundation expects all employees to contribute to enhancing the organisation through their work and conduct. The employees of/contributors to the Foundation/Alliance shall ensure that their conduct while they are working for the Foundation/involved with the Alliance strengthens the good reputation of the Foundation/Alliance. Outside of work for the Foundation/involvement with the Alliance, employees/contributors shall make sure not to harm the organisation's good reputation.

Employees and contributors shall treat everyone as equals, respecting them and their dignity. They shall behave in a culturally sensitive way, use appropriate communication and be careful to present people respectfully in Foundation publications. During working hours, they shall dress in accordance with their role and situation, and thereby contribute to the Foundation being seen in a respectable, positive light. The above rules of conduct apply in the same way to activities online, e.g. regarding the use of social media.

#### b) Sustainable and responsible use of resources

The Foundation expects its employees and contributors to use the organisation's resources responsibly by taking into consideration factors such as relevance, effectiveness, efficiency, environmental, social and long-term impacts and repercussions of using resources. To ensure and monitor compliance with environmental and social standards, the Foundation has implemented an Environmental and Social Management System (ESMS) that is constantly being developed and that includes all areas of organisational action (e.g. event management, procurement, mobility, etc.). The private use of resources that the Foundation makes available to its employees (e.g. notebooks or work mobiles) is not permitted. The work equipment provided by the Foundation may not be used for activities that are unlawful or that contravene the Ethics Policy. This includes any form of harassment, intimidation or humiliation, as well as watching, saving, processing, transmitting or reproducing illegal, obscene, pornographic or discriminatory material. Employees and contributors are obliged to take special care of the resources made available by the Foundation. Theft, unauthorised use and intentional or grossly negligent damage to the Foundation's property - or to property that is directly linked to work in connection with the Foundation – is forbidden.

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#### c) Health, occupational safety and security

The Foundation places considerable emphasis on protecting the mental and physical health of its employees. This includes contractually defined regulations regarding working hours and holidays, how to deal with overtime, as well as providing a workplace with the appropriate equipment to enable employees to work effectively, healthily and safely.

The Foundation adheres to the following standards, which are based on the ILO's core labour standards:

- Employees may exercise their right to freedom of association.
- No forced labour.
- No child labour.
- Employees shall be paid a living wage. The level of remuneration must be sufficient to satisfy the individual's needs and enable additional freely available income.
- A safe and hygienic working environment shall be provided.
- Provisions shall be made for employees and stakeholders in areas including job security, equality and diversity, human resources development and health and safety.

#### d) Zero discrimination

The Foundation does not tolerate any discrimination by its employees or contributors. The concept of discrimination covers any materially unsubstantiated discrimination on account of age, physical impairment, descent, origin, skin colour, gender, political outlook, union activity, religion, culture, language, sexual orientation, or on account of any other distinguishing factors. Employees and contributors shall therefore refrain from any form of discrimination. The same applies to workplace harassment. Inappropriate, violent, or offensive language towards others, whether verbal or written, is prohibited. This also applies when using social media.<sup>2</sup>

#### e) Processing personal data responsibly

Employees of and contributors to the Foundation undertake to always comply with the current data protection provisions and to process any type of personal data responsibly and confidentially. They are required to always comply with the legal provisions applicable in their country. For organisations with registered offices in Germany, this concerns in particular compliance with the General Data Protection Regulation (GDPR).

The Foundation's employees furthermore undertake to comply with the stipulations set out in the Privacy Policy. In the Privacy Policy the Foundation sets out all provisions, regulations and obligations regarding data protection in the organisation. This also includes an obligation to report any violations.

Moreover, contributors are requested to contact info@allianz-entwicklung-klima.de should they suspect that the regulations around responsible, legally compliant processing of personal data

in the Foundation have been violated, or if they have witnessed this type of breach.

#### f) Transparency and publication

The Foundation promotes transparency and knowledge sharing by making various types of information available to the wider public. These include:

- Policy documents (e.g. the Alliance's Statutes and annual reports)
- Technical information (e.g. research, the Alliance's standards, fact sheets, tools and videos)
- General information and educational materials (e.g. flyers, brochures, etc.).

Furthermore, the Foundation Development and Climate Alliance is registered in the Federal Republic of Germany's Transparency Register.

Documents and data from supporters and compensation partners will only be published once consent has been given, e.g. on the map of actors on the website, in the online database of compensation partners, the project abstracts, the short reports on project evaluations and the best practice case studies.

In addition, as a non-capital market-oriented, non-profit foundation, the Foundation is based on the regulations of the Public Corporate Governance code of the Federal Republic of Germany and compiles a corporate governance report each year.

No personal data is published unless consent has been granted under the Federal Data Protection Act. Information that is sensitive for organisational or political reasons, especially concerning management or political background knowledge, will also not be published. Where external actors are closely involved in the value creation of the Foundation, participation is possible, however. This concerns external public relations and events agencies in particular, as well as external consultancy service providers and auditors. The decision regarding participation is made by the board of directors on a case-by-case basis.

#### g) Disclosure of conflicts of interest

The Foundation's employees and contributors shall not exploit their position or associated powers for personal gain or to give preferential treatment to persons close to them. They shall eschew any situation in which their personal interests could conflict with the legitimate interests of the Foundation. They shall disclose any potential personal conflicts of interest without being asked.

#### h) Zero corruption

The Foundation operates a zero-tolerance policy on corruption regarding both employees and contributors. Corruption is defined as the misuse of a public or commercial position of power or in-

<sup>&</sup>lt;sup>2</sup> The Foundation understands harassment as repeated hostile, derogatory, intimidating, degrading or abusive behaviour that often causes psychological impairments in the victims and, as a result, can lead to psychosomatic complaints.

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fluence for personal advantage. Forms of corruption relevant under criminal law include, for example, bribery and corruption, embezzlement, misappropriation, blackmail and fraud. Employees of the Foundation are also subject to the compliance covenants of the KfW.

### 2. Reporting obligations and consequences in the event of violations

Anyone who has concerns or suspicions regarding potential violations of the Ethics Policy or related policies, or who is aware of such an incident, has an obligation to report this immediately. The relevant contact is the administrative office of the Executive Board (info@allianz-entwicklung-klima.de; tel.: +49 (0) 30 3465573-00).

Violations of the Ethics Policy or the associated policies may result in disciplinary action up to and including termination without notice and/or cancellation of the collaboration. The Foundation reserves the right to sue for damages and to report criminal offences in accordance with the applicable legislation.

#### V. Supplementary policies

The following policies supplement the Foundation's Ethics Policy:

- the Foundation's Statutes,
- the Executive Board's Rules of Procedure,
- the Board of Trustees' Rules of Procedure (according to resolution),
- the Environmental and Social Management System (ESMS),
- the Criteria and Standards for Admittance onto the Foundation Development and Climate Alliance's Roster of Compensation Partners
- the guidelines: Development and Climate Alliance: Approved Standards and Processes
- the Privacy Policy,
- the General Investment Guidelines,
- the KfW's compliance covenants and
- the leadership framework for leaders of the Foundation.

All documents can be found on the Foundation's intranet. Documents underlined in blue are publicly accessible on the internet.

The Foundation is committed to supporting employees and contributors in adhering to the guidelines concerning correct conduct, e.g. by providing relevant training for employees or supporting measures for employees and contributors.

### **C. Concluding Provisions**

#### I. Complaints office

The administrative office of the Executive Board records violations or suspected violations of the Ethics Policy and/or the associated policies and subsequently follows these up.

The administrative office of the Executive Board can be reached via the following contact details:

Email: info@allianz-entwicklung-klima.de

Telephone: +49 (0) 30 3465573-00

#### II. Commitment to compliance and confirmation

All Foundation employees shall undertake to confirm in writing that they have read and understood the Ethics Policy and that they will comply with all rules of conduct. They confirm they understand that compliance with this policy and the policies detailed under Point V (in their currently valid version) is the prerequisite for any collaboration.

Contributors must confirm in writing that they have read and understood the Ethics Policy.

### Ethics Guidelines for the Foundation Development and Climate Alliance

Version 2.0

Approved on: 02.12.2021

Approved by: Peter Renner / Dr Olivia Henke

Agreed on: 17.12.2021

Agreed by: Dr Heike Henn / Barbara Schnell

Contact person: Clara Aires

Legal information

Foundation Development and Climate Alliance

Chausseestraße 22 10115 Berlin

As of: 17.12.2021

The valid version is available on the internet and intranet.