

The / Nairobi Climate Network Anti-Corruption & Anti-Bribery Policy

1. Introduction

The Climate Network and its subsidiaries, including the Nairobi Climate Network (NCN) is committed to conducting its activities with integrity, transparency, and accountability. As part of our dedication to ethical conduct and good governance, we uphold a zero-tolerance approach towards corruption and bribery. This Anti-Corruption and Anti-Bribery Policy outlines T/NCN's commitment to preventing corruption and bribery in all aspects of our operations.

2. Scope

This policy applies to all individuals associated with T/NCN, including but not limited to members, volunteers, employees, partners, contractors, and vendors.

3. Definitions

- **Corruption:** The abuse of entrusted power for private gain, including bribery, extortion, fraud, embezzlement, and nepotism.
- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions or decisions of an individual in a position of trust or authority.

4. Principles

T/NCN is guided by the following principles:

- **Integrity:** Uphold the highest standards of honesty, fairness, and ethical behaviour in all activities and relationships.
- **Transparency:** Conduct all operations and transactions in a transparent manner, ensuring accountability and public trust.
- **Accountability:** Hold all individuals associated with T/NCN accountable for their actions and decisions, including adherence to anti-corruption and anti-bribery policies.
- **Compliance:** Comply with all relevant laws, regulations, and international standards related to anti-corruption and anti-bribery.

5. Prohibited Conduct

NCN prohibits the following conduct:

- Offering, giving, receiving, or soliciting bribes or kickbacks in any form, including cash, gifts, favours, or hospitality.
- Engaging in corrupt practices, such as fraud, embezzlement, extortion, collusion, or money laundering.
- Facilitating payments to government officials or other individuals in violation of applicable laws or regulations.
- Accepting or providing improper advantages, including lavish gifts or entertainment, with the intent to influence business decisions or gain unfair advantages.

6. Responsibilities

- **Board of Directors:** Provide oversight and leadership in promoting a culture of integrity and compliance with anti-corruption and anti-bribery standards.
- **Staff and Contractors:** Conduct themselves with honesty, integrity, and professionalism, and report any suspected instances of corruption or bribery promptly.

7. Reporting Procedures

Any individual who becomes aware of actual or suspected instances of corruption or bribery within NCN must report them immediately to the designated compliance officer(s) or through the organisation's [whistleblowing mechanism](#). Reports will be treated with confidentiality and investigated promptly and impartially.

8. Disciplinary Action

T/NCN will take appropriate disciplinary action against individuals found to have violated this policy, which may include termination of employment, contract termination, legal action, or other measures as deemed necessary.

9. Training and Awareness

NCN will ensure that staff are aware of the policies and practices of anti-corruption and anti-bribery principles and practices to ensure that all individuals associated with the organisation understand their responsibilities and obligations.

10. Review and Monitoring

This Anti-Corruption and Anti-Bribery Policy will be reviewed periodically to ensure its effectiveness and relevance. T/NCN will monitor compliance with this policy and take corrective actions as necessary.

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The [Nairobi] Climate Network is committed to fostering a culture of integrity, transparency, and accountability in all aspects of our operations. By adhering to this Anti-Corruption and Anti-Bribery Policy and working together, we can uphold the highest ethical standards and contribute to a more sustainable and just society.