

# Anti-Bribery, -Corruption, and - Fraud Policy

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ClientEarth is committed to the highest standards of integrity, transparency, and fairness in the conduct of its activities. We take a zero-tolerance approach to the offences of bribery, corruption, and fraud. We wish to foster a culture in which everyone is aware of what these offences are and feels comfortable raising any related concerns. The Policy sets out ClientEarth’s process to prevent bribery, corruption, and fraud, and makes staff aware of their responsibilities in observing and upholding ClientEarth’s position on bribery, corruption, and fraud. It is also designed to comply with our legal obligations.

This Policy has been approved by ClientEarth’s Executive Team, and reflects our values.

Values	Application in this Policy
Acting courageously	<ul style="list-style-type: none"><li>• We will report any bribery, corruption, and fraud, including suspicions</li></ul>
Prizing diverse experience	<ul style="list-style-type: none"><li>• We use specialist advice to ensure that we are compliant with anti-bribery, -corruption, and -fraud laws, wherever we operate</li></ul>
Embracing collaboration	<ul style="list-style-type: none"><li>• We recognise the expertise of the Finance and Governance &amp; Legal Services Departments to support staff in implementing our relevant policies and procedures</li></ul>
Learning continuously	<ul style="list-style-type: none"><li>• We will respond to questions and feedback on this Policy and monitor relevant legislative developments to update it as appropriate</li></ul>
Opposing injustice	<ul style="list-style-type: none"><li>• We take a zero-tolerance approach to bribery, corruption, and fraud. We have a duty to report all suspected incidents, to always investigate, and take appropriate action</li></ul>
Focusing on impact	<ul style="list-style-type: none"><li>• We conduct all our activities in an honest, ethical, transparent, and fair manner, in order to maximise impact</li></ul>

## What is the Scope of this Policy?

This Policy applies to all ClientEarth entities and staff worldwide, including governance and management board members of all ClientEarth entities, who are expected to use best judgment in applying this Policy, and to play an active part in preventing non-compliance and in promoting best practices.

Staff are responsible for avoiding, preventing, detecting, and reporting bribery, corruption, and fraud. Staff non-compliance with this Policy could be considered as a breach of employment agreement, and could lead to disciplinary action by ClientEarth, in line with local labour law.

We achieve impact through funding provided by Funders, and through collaboration with Partners, and we hold them to the same standards integrity, transparency, and fairness as we hold ourselves. Non-compliance may result in the termination of appointments, contracts or other formal agreements. We work with our Partners and Funders to ensure that they raise concerns with us at the earliest opportunity. This Policy is thereby publicly accessible to all, as well as our reporting channel via the **TellUs** tab, on our [Transparency | ClientEarth](#) webpage.

## ClientEarth’s Principles-Based Approach to Anti-Bribery, -Fraud and -Corruption

Principle 1: We take a zero-tolerance approach to bribery, corruption, and fraud



**ClientEarth prohibits** the offering, promising, giving, solicitation, or acceptance of any bribe, whether cash or other inducement, **to or from** any person or organisation, wherever they are situated and whether they are a public official or body, private person, or company, **by** any individual employee, agent, or other person acting on ClientEarth's behalf, **in order to** gain any commercial, contractual, or regulatory advantage for ClientEarth in a way which is unethical, **or to** gain any personal advantage (financial or otherwise) for the individual or anyone connected with them.

Principle 2: We are committed to acting with integrity, transparency, and fairness in all environments

ClientEarth's activities and relationships span many countries, and practices may vary, but we act professionally and comply with the same standards wherever we work. We enforce effective systems and processes to counter bribery, corruption, fraud, and the risk of diversion or misuse of funds.

Principle 3: Payment requests from third parties must only relate to signed agreements or orders

Payments must be supported by an invoice, or a Partner financial report. Payments will only be made to the bank account provided in the signed agreement or (if a contract is not required under the Procurement Policy) a signed letter or redacted bank statement from the supplier. Any changes require a signed contract addendum or confirmation as above. **Supplier or partner bank details will never be changed based on an email alone.**

Principle 4: ClientEarth does not make, nor does it accept, facilitation payments or "kickbacks"

Any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us must be avoided. This does not prevent payments made in an emergency situation to preserve or protect a member of staff's personal safety or welfare.

Principle 5: Caution is needed when Public Officials or Politically Exposed Persons (PEPs) are involved

Extra caution must be taken when interacting with Public Officials or PEPs and their close personal connections. Many laws treat interactions with Public Officials or PEPs differently from those with other individuals, and may not allow charities to financially interact with PEPs

Principle 6: We are compliant with competition law provisions and do not engage in anti-competitive conduct

Care must be taken when collaborating with other organisations, especially sharing competitively sensitive information, or when applying for government or tendered contracts.

Principle 7: Modest and appropriate gifts, hospitality, and entertainment are permitted

Gifts, hospitality, and entertainment may be given and received, to or from third parties. Checks must be followed to ensure that these are not excessive and not being offered for unlawful or unethical purposes.

Principle 8: All concerns in relation to bribery, corruption, and fraud must be reported

Where staff, Partners, Funders, or any member of the public are aware of or have concerns in relation to bribery, corruption, or fraud, they should report it immediately. Anyone who raises a concern under this Policy is protected under our Whistleblowing Policy, which will apply to the investigation and treatment of the report.

**Brussels      Beijing      Berlin      London      Warsaw      Madrid      Los Angeles      Luxembourg**

ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a non-profit limited liability company in Germany, ClientEarth gGmbH, HRB 202487 B, a registered foundation in Poland, Fundacja "ClientEarth Prawnicy dla Ziemi", KRS 0000364218, NIP 7010254208, a registered delegation in Spain, Fundación ClientEarth Delegación en España, NIF W0170741C, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836, a registered subsidiary in Japan, Ippan Shadan Hojin ClientEarth, corporate number 6010405022079, a registered subsidiary and company limited by guarantee in Australia, ClientEarth Oceania Limited, company number 664010655.