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ANTI-CORRUPTION POLICY

The following policy applies to the operations of Terraforming's personnel and consultants internationally as well as to Terraforming's cooperation with financiers and partner organizations.

Why fight corruption?

A society free from corruption is a basic prerequisite for fair and democratic development. Corruption in developmental, educational, and cultural efforts reduces confidence in and the desire to finance these types of projects.

Corruption goes against basic values such as justice, democracy, equality, dignity, integrity, transparency, and the possibility to demand accountability.

Definition of Corruption

Terraforming follows Transparency International's (www.transparency.org) definition of corruption:

"Corruption is the abuse of entrusted power for an illegitimate individual or group benefit"

The concept of corruption includes abuse of trust or position, and occurrences such as the giving or receiving of bribes, blackmail, favoritism, nepotism, swindling, challenge, and embezzlement.

Anti-corruption Commitment

Terraforming's basic principle is **never to accept corruption** and always to take action **and report** cases of suspected corruption.

For that reason, Terraforming will:

- Produce and make available documented clear routines for counteracting corruption, including for handling suspected cases of corruption;
- Ensure that all Terraforming's personnel, including employees, consultants, volunteers, and associates, have sufficient knowledge concerning this anti-corruption policy;

In order to secure the prevention of corruption, Terraforming will continuously work on the strengthening of organizational culture through learning from experiences and continually improving its working methods and routines.

Terraforming will work on evaluating corruption risks when creating operational and project plans, including budgets, ensuring that planned projects have clearly formulated goals, expected results, and activities, as well as routines for follow-up, including transparency in project evaluations.

Suspected Corruption

It is the responsibility of every employee, consultant, or volunteer involved to be vigilant and to report any suspected corruption.

The responsibility for investigating corruption lies with Terraforming's project manager and, further, Director.

In the case of suspected corruption, Terraforming shall ensure that it is documented and reported. Terraforming will take necessary steps to alert the funding institution(s) of suspected corruption. In the case of a suspected crime, the issue will be reported to the police.

Additional documents:

1. Information for employees, consultants, and volunteers about anti-corruption policy;
2. Routines on counteracting corruption and handling the suspect corruption;

This document was approved at the Annual Assembly meeting on May 23, 2013, in Novi Sad, Serbia.