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1. Introduction and scope

OIKOCREDIT, Ecumenical Development Cooperative Society U.A. (“Oikocredit” or “Cooperative”) has grown into a worldwide organisation across diverse jurisdictions. We must be conscious of the impact our actions can have on society and carry out our activities in accordance with the highest ethical standards.

In this context, this Policy is designed to outline and clarify the prohibitions against bribery and corruption throughout our operations, reinforcing the Cooperative’s ethical commitments. It applies to Oikocredit and its subsidiaries, branches, and offices globally; external workers, contractors, and consultants; trainees, interns, and students; temporary and permanent staff members; directors (statutory and non-statutory members of the Executive Committee); members of the Supervisory Board and Member Council (“Colleagues”).

Where local rules impose a higher standard, that higher standard or stricter guideline must be followed.

2. Prohibition on bribery

Colleagues are strictly prohibited from offering, promising, authorising, or paying anything that is of value to public officials* or private persons in order to improperly secure an advantage or influence the person’s actions. Whether anything is “of value” must be determined from the perspective of the involved persons.

* **Public officials** comprise higher-level and regular employees of any governmental body (including representative bodies, judiciary and arbitration bodies, and armed forces), as well as employees of private organisations carrying out public functions. In addition, public officials include those employed at public international organisations (for example: the IMF, the EBRD, the UN).

This prohibition covers not only cash payments, irregular payments, and “kickbacks”, but also other forms of benefits and favours, such as:

- gifts, meals, entertainment, lodging, or travel;
- employment, business favours, donations, or sponsorships;
- favouring or hiring of relatives;
- accepting or assisting with the preparation of false documentation (for example: inaccurate or fake invoicing).

3. Facilitation payments

As a rule, **Oikocredit does not allow the use of facilitating payments**. Facilitation payments are typically cash payments to public officials in order to facilitate or expedite routine actions to which Oikocredit is legally entitled – for example: transaction clearances, licenses, permits, reports, visas.

A facilitation payment may only be allowed under exceptional circumstances – for example: when an employee's health or safety is at risk. In this case, it should have prior approval of the Head of Legal & Compliance plus one member of the Managing Board. If the situation does not allow the payment to be pre-approved, then it must be reported to groupcompliance@oikocredit.org as soon as possible and no later than 72 hours after its occurrence.

4. Charitable and political contributions

It is not Oikocredit's common practice to make monetary and other contributions to charities, social projects, and funds of any kind outside of our Capacity Building programme. Therefore, **charitable contributions must be previously approved by the Head of Legal & Compliance plus one member of the Managing Board**. Before requesting such approval, there must be appropriate due diligence of the recipient charity, social project, or fund.

Political contributions are prohibited.

5. Hospitality and nominal gifts

Colleagues may only offer gifts and nominal hospitality (for example: transportation, accommodations, meals, entertainment, nominal gifts) to commercial counterparties if all of the following **criteria** are met:

- (a) there is a clear business purpose which is directly related to Oikocredit's mission and objectives;
- (b) the offer is genuinely connected with the promotion, demonstration, or explanation of Oikocredit's products and services (bona fide);
- (c) the offer has a reasonable amount (that is, will not be perceived as luxurious or extravagant) and is permitted under local laws and customs;
- (d) for gifts, the value should not exceed EUR 50; and
- (e) the offer was approved by the Head of Legal & Compliance.

The criteria for receiving gifts and nominal hospitality are similar to the above criteria for offering. **Offering and receiving gifts and hospitalities should be an exceptional practice to avoid creating the appearance of improper conduct**. Make sure to obtain all relevant pre-approvals before offering or accepting any form of gift. You can do this by providing relevant details to your line manager or director – if in doubt, seek advice from the Compliance Unit. **All gifts (offered as well as received) must be documented and reported to the Director of Finance & Risk.**

As a rule, Oikocredit will pay for hospitalities itself rather than reimbursing the recipient. **No hospitalities may be extended or gifts given to family members or close associates of public officials anywhere without the prior approval of the Head of Legal & Compliance plus one member of the Managing Board.**

6. Third party management

The above prohibitions also apply to third-party intermediaries acting on behalf of Oikocredit (for example: agents, vendors, contractors). All payments made to third parties (including fees, compensation, and reimbursements) must be made to the person who is party to the contract. Payments in cash or other bearer instruments (such as bearer cheques) are prohibited, unless allowed under the Petty Cash Fund Management Procedure (or any local petty cash procedure as approved by the Accounting, Control & Tax Unit) for minor administrative expenses below EUR 100.

Any red flags raised during the due diligence review of a third party must be addressed prior to entering or continuing the relationship, with documented remediation measures when applicable, as outlined in the Procurement Policy.

Examples of red flags (higher-risk indicators for bribery and corruption) involving intermediaries include the following:

- lack of transparency or refusal to provide information regarding ownership structure, business activities, or relationships with public officials;
- the intermediary employs a public official, or is owned in part by a public official or their family members;
- the payment or fees seem excessive compared with market rates for similar legitimate services;
- the scope of services offered by the intermediary contains unnecessary, unclear, or unusual descriptions;
- there are strong indications that business in the intermediary's location is broadly conducted via bribery;
- the intermediary makes comments to the effect that a particular amount of money is needed in order for them to "get the business" or "make the necessary arrangements".

Contracts with intermediaries must contain standard anti-bribery and anti-corruption provisions in compliance with applicable laws, the Procurement Policy and this Policy. In certain cases involving higher risks (for example: due to the country, the service, the size of the payment), the contract should also contain right-to-audit provisions.

7. Reporting

Besides damage to Oikocredit's reputation and values, bribery and corruption offences may also result in severe penalties, including fines and imprisonment. Therefore, **potential violations of this Policy must be immediately reported.** This can be done by contacting your line manager / director and groupcompliance@oikocredit.org.

Retaliation against complainants and whistleblowers who reported an issue in good faith is prohibited, as well as retaliation against those who assist or cooperate in subsequent investigations. Oikocredit may only disclose the identity of a reporting person if (i) the person agrees with doing so; or (ii) that is a necessary and proportionate legal obligation – for example: in the context of further investigations by authorities or judicial proceedings. **Under the principles of fairness and presumption of innocence, the identity of the accused person(s) should also be protected during the entire investigation process.** For more details, please refer to Oikocredit's [Code of Conduct](#) and Whistleblowing Policy.

All Colleagues are responsible for complying with this Policy. Colleagues who are found to have acted in violation of this Policy may be subject to disciplinary sanctions up to and including termination. When appropriate, Oikocredit will report the case to the relevant public authorities.

This Policy will be published both on an internal Oikocredit source and on an external source.

Change History Record & Publication Table

| Version | Date | Changes/Status | Author/Editor |
|---------|------------------|---|--|
| 0.1 | 18 Dec 2017 | First draft | Lydia Tomitova |
| 0.2 | 2 April 2019 | Update to reflect changes in Oikocredit's governance and applicable law | Lydia Tomitova |
| 0.3 | 14 May 2019 | Revision after comments from the NFRC | Lydia Tomitova |
| 0.4 | 3 June 2019 | Revision to incorporate additional comments by the NFRC | Lydia Tomitova |
| 1.0 | 2 July 2019 | MB approval | - |
| 1.1 | 07 December 2023 | Content review by Legal & Compliance | Piet-Hein Berkhout, Fred Nascimento, Cor Jan Dasselaar |
| 1.1 | 19 December 2023 | Approved by the Director Finance & Risk | Gwen van Berne |
| 1.1 | 19 December 2023 | Informed to the NFRC | N/A |
| 2.0 | 11 March 2024 | Reviewed by Legal & Compliance | Piet-Hein Berkhout, Fred Nascimento, Matt Cyrus, Cor Jan Dasselaar |
| 2.0 | 23 April 2024 | Reviewed by Legal & Compliance, following suggestions from the CRRC | Piet-Hein Berkhout, Fred Nascimento |

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