



Certified Emissions Reduction Technologies Foundation

ANTI-CORRUPTION POLICY

*Zero-Tolerance Prohibition of Bribery and Corruption, Aligned with ISO
37001:2025*

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Document Control

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Version History

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1. Purpose, Scope and Standards Alignment

1.1 Carbon markets operate in jurisdictions and sectors with elevated corruption exposure — land rights, permitting, government authorisations (including Article 6 letters of authorization), and community benefit flows. This Policy implements Charter Clause 14.1 with a zero-tolerance prohibition on bribery and corruption in any form.

1.2 Scope. All CERT Persons (per the Code of Ethics) and all third parties acting for or on behalf of CERT (agents, consultants, suppliers, hosting providers, event partners). Through the Registry Rulebook, corruption by participants or VVBs in connection with CERT processes is additionally sanctionable as an integrity breach.

1.3 Alignment. This Policy is designed to satisfy ISO 37001:2025 (anti-bribery management systems, including its strengthened third-party due diligence and conflict-of-interest provisions), the Indian Prevention of Corruption Act, 1988 (as amended in 2018, including Section 9 liability of commercial organisations for failure to prevent bribery), and the extraterritorial statutes most likely to apply to CERT's international counterparties: the US FCPA and the UK Bribery Act 2010.

2. Prohibitions

2.1 No CERT Person or third party acting for CERT shall offer, promise, give, request, or accept — directly or through intermediaries — any financial or other advantage to or from any person, to influence improperly any act or decision, obtain or retain business or advantage, or reward improper performance.

2.2 Public officials. Heightened care applies to any dealing with public officials (including officials of host-country carbon authorities and UNFCCC-related bodies). Nothing of value may be provided to a public official to influence an authorisation, registration, or approval.

2.3 Facilitation payments are prohibited, including small unofficial payments to expedite routine actions. If a payment is extorted under duress or threat to safety, it must be reported within 48 hours and recorded accurately.

2.4 Kickbacks and success fees. CERT does not pay or accept commissions contingent on registration, issuance, or accreditation outcomes, and prohibits its staff from accepting any share of project revenues.

2.5 Books and records. All transactions are recorded accurately and completely. Off-book accounts and false descriptions are prohibited.

3. Gifts, Hospitality and Expenses

3.1 Permitted only if reasonable, infrequent, transparent, and incapable of being perceived as influencing a decision. Hard limits: nothing during a live application, review, investigation, or procurement involving the giver; cash and cash equivalents never.

Category	Threshold	Requirement
Gift	Up to USD 50 per item, USD 100/year per source	Above threshold: refuse or surrender to CERT; record in gifts register
Hospitality (meals, receptions)	Up to USD 100 per occasion	Above threshold: pre-approval by line manager and gifts register entry
Travel and accommodation	Not accepted from external parties	CERT pays its own travel; conference fee waivers require Ethics clearance
Speaker honoraria	Not accepted for CERT-role appearances	Redirect to CERT or decline

3.2 The gifts register is maintained by the Secretariat and reviewed quarterly by the Ethics and Integrity Committee; entries above thresholds are cross-posted to the register of interests (GOV-002 §4.3).

4. Third-Party Due Diligence

4.1 Risk-based due diligence is mandatory before engaging any third party acting for CERT, proportionate to corruption risk (country, sector, government touchpoints, remuneration structure). High-risk engagements require enhanced due diligence, anti-bribery contract clauses, audit rights, and Ethics and Integrity Committee sign-off.

4.2 Ongoing monitoring — not only initial screening — is required for continuing engagements, consistent with ISO 37001:2025. Red flags (requests for unusual payment routes, third-country accounts, undisclosed sub-agents, relatives of officials) suspend the engagement pending review.

4.3 Participants and VVBs. The Registry Rulebook requires participants and VVBs to warrant compliance with applicable anti-corruption law in connection with CERT processes; breach is ground for sanction, suspension, or de-accreditation.

5. Donations, Sponsorships and Community Benefits

5.1 CERT makes no political contributions (Code of Ethics §3.7). Charitable donations and sponsorships require Chief Executive approval, Ethics screening for disguised inducements, and publication.

5.2 Community benefit-sharing within projects is a safeguards matter governed by methodologies and the Rulebook; CERT staff must not direct or intermediate such flows.

6. Anti-Bribery Function, Training and Culture

6.1 The General Counsel is designated the anti-bribery compliance function (ISO 37001 §5.3.2), with direct access to the Ethics and Integrity Committee and the Board, and responsibility for risk assessments, due diligence oversight, training, and monitoring.

6.2 Annual anti-corruption training is mandatory for all CERT Persons; enhanced training for staff dealing with host-country authorities, procurement, and accreditation.

6.3 An annual bribery risk assessment feeds the Risk Management Framework (CERT-GOV-006) risk register.

7. Reporting, Investigation and Sanctions

7.1 Suspected corruption is reported through Whistleblower Policy channels (CERT-GOV-004) and investigated under Ethics and Integrity Committee oversight.

7.2 Sanctions follow GOV-002 §8.2, up to termination and referral to law enforcement. CERT cooperates with lawful investigations by competent authorities.

7.3 No adverse action shall be taken against any person for refusing to pay a bribe, even where refusal causes loss of business or delay.

8. Administration and Review

8.1 Owner: Ethics and Integrity Committee, supported by the General Counsel. Review at least every three years and upon material change in ISO 37001, applicable law, or CERT's risk profile.

8.2 References: ISO 37001:2025; Prevention of Corruption Act, 1988 (India); US Foreign Corrupt Practices Act; UK Bribery Act 2010; OECD Anti-Bribery Convention; CERT-GOV-002; CERT-GOV-003; CERT-GOV-004; CERT-GOV-006.