



Ethics Policy - April 2017
Carbomap Ltd.

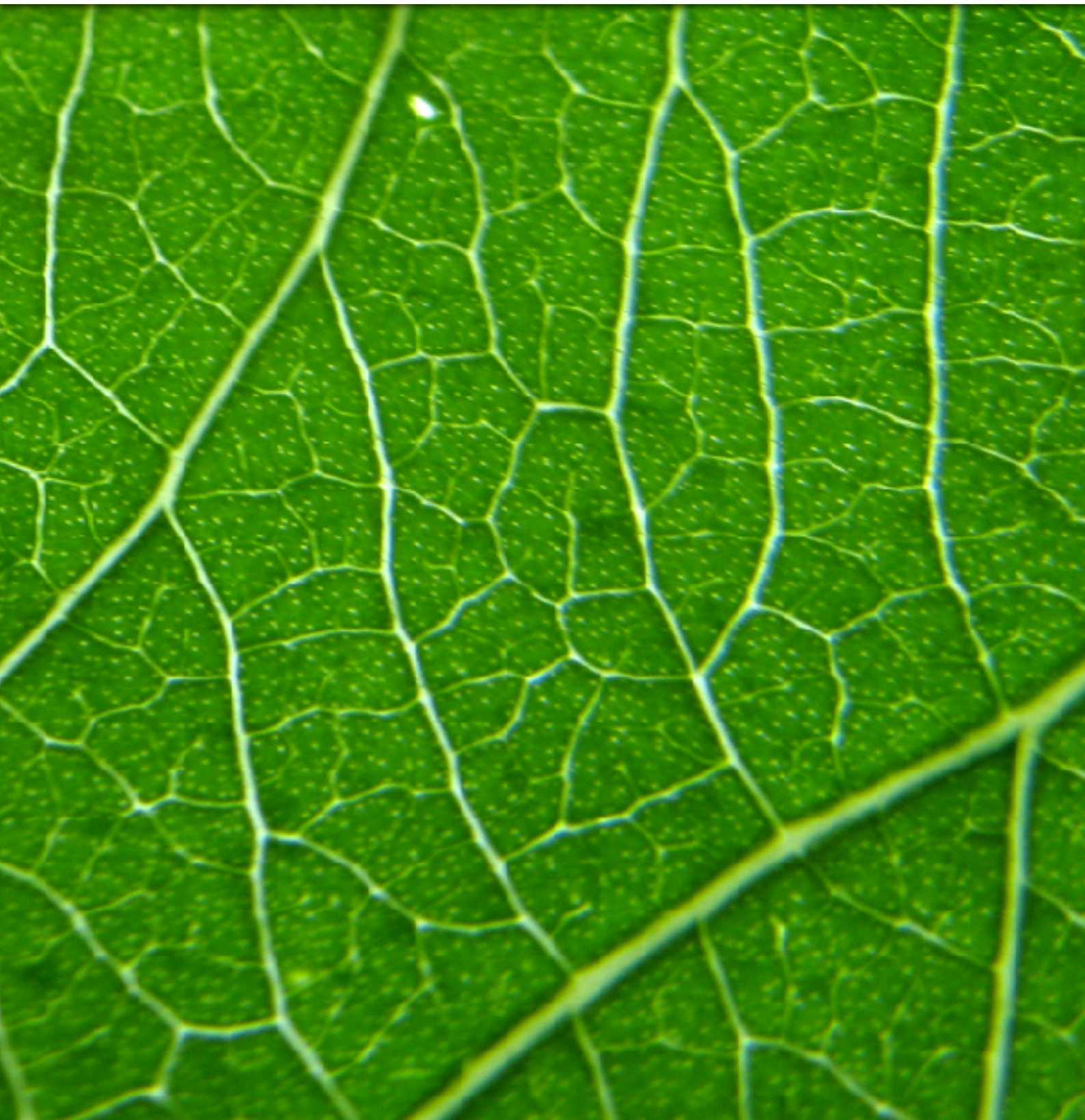


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Carbomap Ltd., United Kingdom

April 2017

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Summary

Carbomap's Ethics Policy covers nine key areas:

1. Ethical Practice and Values
2. People, Workplace, and Culture
3. Honesty, Transparency, and Fairness
4. Conflicts of Interest, Bribery, and Corruption
5. Environmental Protection
6. Forest Stewardship
7. Human Rights, Social, and Economic Development
8. International Development
9. Reporting and Whistleblowing



1. Ethical Practice

Carbomap:

- Demands and maintains consistently high ethical standards in carrying out our activities, with the overall aim of having a positive effect on people and the environment globally.
- Believes in equality between peoples, aiming to actively work to treat people of differing ethnic origins, cultures, gender, ages, and sexual orientation with equality and respect. This applies not just within our own company in the recruitment and treatment of our employees, but in all people we deal with as a company.
- Believes integrity, honesty and transparency are vital. We will always aim to work with the highest possible standard of integrity, remaining consistent with our values.
- Believes our values help to uphold Carbomap's reputation and maintains public confidence in us, and are one of our most valuable assets.
- Will always aim to abide by the laws and regulatory framework in the countries where we are conducting business, and the law of Scotland where we are headquartered. We will comply with the spirit of the law where it is unambiguous, avoiding taking advantage of loopholes or poorly written regulation.
- Will admit to any ethical, legal or technical mistakes that we make, disclosing details of how and why the breach occurred, and how we will learn from the mistake.
- Recognises our moral as well as legal obligations towards staff, shareholders, clients, suppliers, collaborators, competitors and the wider global community.
- Seeks to work with charities and organisations that align with our ethics and values. Where we have capacity to provide cost-free data or services to not-for-profit organisations, we will aim to provide it.
- When the company is profitable, we will donate 15% of all profits to a suitable charity aligned with the environmental stewardship ethos of the company.



2. People, Workplace, and Culture

Carbomap:

- Ensures that our ethics and values are regularly discussed with all staff members, helping to ensure that they are respected at all levels of the company. To achieve this:
 1. Ethics will be a standing item in monthly board meetings.
 2. This ethics policy will be distributed to all new employees, who will be tested on its content in a multi-choice test.
 3. Ethical issues will be discussed in a dedicated meeting with all staff at least every 12 months, and ad hoc ethical meetings called if issues are identified by the board or any staff member. This policy will be distributed to all staff in advance of the meeting, who will be asked to comment on any issues they faced relating to it over the past year, and it will be reviewed at the meeting.
- Ensures that pay and rewards, for all employees, are fair and clearly linked to individual and company performance. Carbomap will:
 1. Pay employees at least the Living Wage.
 2. Give responsibility to the CEO for making the case to the Board that all salaries are fair, with the Board then approving or making changes as appropriate.
 3. Limiting the highest salary (pro rata) within the company so that it will never be greater than 10 times the lowest salary across the company.
- Ensures that we treat our employees equally regardless of race, religion, age, national origin, gender, sexual orientation, disability, maternity, marital or family status. To achieve this:
 1. There will be an annual audit of diversity within employees and efforts made to ensure all are treated equally in working conditions, pay, promotion/advancement/training opportunities and work. This will be performed by a senior member of staff within Carbomap, and a report issued to the board.
 2. This ethics policy will be distributed to all new employees, who will be tested on its content in a multi-choice test.
 3. Whether the company has succeeded in meeting this aim will be discussed at the annual ethics meeting of employees.
- Value our staff as our key asset, promoting good achievement and morale through positive feedback, clear target setting, offering training and development opportunities, and rewards for successes both big and small.
- Will allow staff to take one day per year (pro rata) as paid vacation to conduct charitable work or fund raising for a charity.
- Listening to all staff, promoting both informal and formal channels to speak to management about any issues, including business and ethical issues. Ensuring staff have a route to report or discuss issues about their line manager with an independent person, either the Chairman of the Board or other nominated Director.

- Acts as a self-supporting network to the benefit of all staff and operations
- Ensure back-up expertise is available when required by any member of staff or project, by:
 1. Ensuring at least two staff members are aware of the details of a project, so peer assistance can be provided, and there is redundancy if one staff member is ill or otherwise unavailable.
 2. Ensuring files are available to all Carbomap employees through the use of a central file server.
 3. Where Carbomap does not have the relevant expertise in-house, we will work with external partners to provide that expertise.
- Recognises and supports the right of our employees to join a trade union if they wish.
- Will not interfere in any employees outside activities, however we expect staff to behave in ways that would not bring the company into disrepute.
- Ensures that we do not ask our employees to regularly work overtime, and where working beyond contracted hours is required we offer either Time Off In Lieu or additional pay to recognise this additional contribution to the company.
- We are supportive of healthy, family-friendly flexible work times. Some of the ways we achieve this include agreeing flexi-time arrangements and by allowing remote working, either from home or elsewhere.
- Recognises that employers obtain sensitive data about employees, and will work to safeguard these data and respect our employee's privacy.
- Ensures that our workplace and office values and code of conduct aligns with our ethical policy and values

3. Honesty, Transparency, and Fairness

Carbomap:

- Ensure that we're honest and transparent in how we do business and engage externally, through:
 1. Publishing our ethics policy.
 2. Being open about any contentious ethical issues, for example working with a company that does not entirely meet our values.
 3. Openly answering any questions about our ethics standpoint from our investors, employees, clients or members of the public, provided giving out information does not contravene privacy concerns.
- Aims to delivery high quality outputs to our clients, with value for money as a priority. Where possible we will transparent about the pricing structure used to determine our price for the client.
- Recognise consistency to be an ethical as well as quality issue.
- Ensures that we follow a strict Internal quality control, by ensuring that all outputs are checked by another member of staff.
- If outputs fail to reach the quality we expect, we will work to fix issues within the scope of the work in a timely manner by applying our rigorous internal QA process, which includes the opportunity for our clients to provide feedback.
- Seeks to act responsibly through our actions to ensure good outcomes for our clients.
- Will liaise with and involve clients when designing the offered services, ensuring we meet their needs to our best ability.
- Ensures that we charge a fare rate to our clients, and will always explain fees in a way that the client can understand.
- Aim to deal equitably with all with whom we work.
- Aims to act with the highest level of professionalism particularly with regard to quality and timeliness.
- Will not engage in irresponsible marketing or sales practices, by being honest in our products and capabilities at all times, not targeting vulnerable groups, and trying to ensure buyers and informed.
- Uses only legitimate practices in commercial operations and promoting the company position on issues relating to our activities.

4. Conflicts of Interest, Bribery, and Corruption

Carbomap:

- Expect all staff and partners to declare to their line manager any conflict of interest in any contract, sales position or with any contact, in writing. Their line manager will record a written response to this, with both shown to the Board at the next meeting. A decision will be made by the line manager, where thought necessary in consultation with the Board (and otherwise merely reviewed by it), enabling us to ensure whether this conflict can be managed such that it has no impacts with our obligations as an organisation and to our clients. If the conflict is impossible to manage satisfactorily, then business with the relevant party should not continue.
- Will employ only reputable and qualified individuals or firms, as evaluated by our pro-forma due diligence form.
- Will conduct due diligence on sub-contractors, partners, clients, and collaborators to ensure their activities do not impact and conflict with our ethical values, by following this process:
 1. Implementing our two-stage vetting process which covers the jurisdiction, registration, recent news stories, and other status of a company, and how these relate to our ethical standards.
 2. If we have never heard of the individual or organisation, we will contact at least two people we trust who know the organisation well, and contact them preferably by phone (otherwise email) to confirm that the organisation is reputable.
- Will not knowingly engage with any organisation or individual who have an ongoing record of corruption or bribery.
 1. We will perform a web search and other due diligence in advance of working with any individual or organisation as described above.
 2. Before working with any individual or company we will sign a Memorandum of Understanding or more formal contract, which will always include a no bribery clause, and strong termination terms if such behaviour is discovered.
 3. If we become aware at any point during our relationship that an organisation or individual we work with is engaged with corruption or bribery, we will terminate our relationship as soon as possible.
- Will not support nor donate to any political party, politician, or partisan political campaign group. Where any pro bono work is performed for an NGO, or uncharged for work done for a potential client in the hope of attracting further business, it will not be performed in the expectation of any improper preferential treatment or influence.
- Employees are not allowed to accept personal benefits of any kind, except unsolicited, infrequent gifts provided they are not being made in relation to special consideration or decision. Any gifts or benefit with a nominal value of >£50 must be reported to the employee's line manager or the board, and records must be kept that can be released on request.

5. Environmental Protection

Carbomap:

- Activities are focused around the protection, and promotion, of the environment, and we will endeavour to minimise our own impact on the environment where possible.
- Aims to practice what we preach and have appropriate processes in place for minimising our environmental impact.
- Will not undertake any activities which actively contributes to global climate change lightly: transport will always only be undertaken where thought truly necessary (with video conferencing used where possible), and where possible will use the lowest carbon emission option (for example train rather than driving for short and medium distances).
- Aims to be a 'carbon neutral' company, offsetting our carbon emissions where possible.
- Will report their carbon emissions annually, along with evidence of the offsetting.
- Always seeks to reuse equipment before either recycling or disposing of the waste in accordance with the appropriate legislation.
- Aims to follow day-to-day examples of environmentally friendly behaviours, including:
 - The use of recycled paper and/or FSC certified paper;
 - Double sided printing where possible;
 - The recycling of all excess paper;
 - Switching off unnecessary lights;
 - The purchase of Fair Trade products over other commercially produced products such as tea and coffee, cleaning products etc.
- Our day-to-day environmental behaviour will be reviewed at our annual ethics staff meeting.
- Will work with and help organisations that wish to reduce and improve upon their existing environmental impact, and foster greater sustainable behaviour

6. Forest Stewardship and Natural Resources

Carbomap:

- Will not contribute to any activities which supports and furthers the unsustainable use of natural resources, except where our activities are working to reduce negative or unsustainable practises.
- Aims to only use sustainable natural products and services.
- Will not engage in any activities which will put forests areas at risk, such as aiding unsustainable logging and land use change, except where they are acting to improve existing behaviours.
- We will not engage in activities which will lead to significant degradation or loss of habitats for endangered animal species.
- Will work with and help organisations that wish to reduce and improve upon their existing unsustainable use of natural resources.
- Will work with and help organisations that wish to reduce and improve upon their existing detrimental impact upon forest habitats.
- We will not engage in activities which will contribute to the felling of tree species that are on the International Union for Conservation of Nature (IUCN) Red List.
- Where possible, any logging / timber projects we agree to work on must have Forest Stewardship Council (FSC) certification (or relevant equivalent) or be using our project to achieve such certification.



7. Human Rights, Social, and Economic Development

Carbomap:

- Will uphold basic human rights for every person.
- Encourages participatory approaches to promoting human rights by engaging with stakeholder specifically directed at improving lives of marginalised people.
- Will not advocate discrimination and incitement to hatred against any person regardless of race, religion, age, national origin, gender, sexual orientation, disability, maternity, marital or family status.
- Seeks to promote social, economic, and environmental development at home and across the whole world.
- Will not deal with any oppressive regime, defined as a regime that, in the view of the Carbomap Board, unjustly inflicts hardship and constraint on any majority or minority, or other subordinate group, under the control of the regime.
- Takes a responsible approach to the payment of tax globally by ensuring that we act within the spirit of the law in any jurisdiction within which we are due to pay tax.
- Does not bank with a service provider that provides banking services to businesses or organisations that conflict with our Ethics Policy.

8. International Development

Carbomap:

- Believes in, and supports, development and poverty reduction in developing countries.
- Supports fair trade.
- Employees will treat all persons affected by our interventions with dignity and affording special consideration to impoverished and other vulnerable populations.
- Aims to ensure positive outcomes for poor and marginalised people.
- Believe in the rights of workers to freedom of association, and will not work with any organisation that fails to do so.
- Vehemently oppose the use of child labour, and will not work with any organisation that does not adhere to this.
- Will not impede access to basic human necessities, nor work with organisations that do.
- Endeavour to support capacity development initiatives, and include them within relevant project work, wherever possible.
- Supports the principles of academic freedom, and will not seek to hinder the publication of results by our academic partners.

9. Reporting and Whistleblowing

Carbomap:

- Expect any actions that contravene our Ethics policy to be raised with Senior Management or the Board at the earliest possible time.
- Expect any employees with concerns regarding something that may impact and conflict with our Ethics policy to discuss it with their line manager, or another member of the Board if they are not comfortable, for whatever reason, discussing the issue with their line Manager.
- Will not tolerate any form of retaliation towards any member of staff in relation to the reporting of potential violations of any Carbomap company policy.