



CODE OF ETHICS

April 2021

Responsible Area: Funbio Ethics Committee

APPLICABILITY:

This Code of Ethics applies to all of Funbio's collaborators, board members, partners and suppliers.

VALIDATION

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CONTROL OF VERSIONS

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1	April 2012	Jacqueline Ricarte	Inactive
2	April 12, 2013	Flávia Neviani	Inactive
3	December 5, 2014	Mônica Ferreira and Jacqueline Ricarte	Inactive
4	August 17, 2017	Alexandre Ferrazoli, Andrea Goeb, Fábio Leite, Mateus Almeida	Inactive
5	April, 2021	Flávia Neviani, Alexandra Leitão, João Ferraz and Heloísa Henriques	Active

RELATED DOCUMENTS:

- Funbio's Policy for the Prevention and Suppression of Money-Laundering and Terrorist Financing (P-33/2015);

- Funbio's Grievance Policy (P-17/2018).
- Funbio's Policy for Environmental and Social Safeguards (P-24/2020)
- Funbio's Project Appraisal Policy (P-21/2013)
- Funbio's Bylaws

CONTACT:

Funbio's Ethics Committee can be contacted at: comite.etica@funbio.org.br

Privacy: This document is public and available for consultation on the Funbio website. It must not be edited or altered without express consent.

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I. INTRODUCTION

1. Funbio’s Code of Ethics is a key instrument in guiding the actions and decisions taken in the institution’s dealings with its various stakeholders.
2. This code defines the behavioral norms that will orient and formalize institutional and operational relations in such a manner as minimizes subjective interpretations concerning what constitutes an ethical principle.
3. Nobody has the right to request or coerce any Funbio collaborator to break the law or infringe upon the values, principles and directives established herein.
4. All of Funbio’s collaborators and board members, suppliers, advisers and partner organizations have the right to obtain clarifications or express concerns over improper workplace behavior they feel is in breach of the guidelines set forth in this Code.

5. Funbio can sever ties or rescind contracts in the case of proven infringement of the law and/or the principles expressed in this Code.

II. DEFINITION

6. Adoption of values and principles that guide behavior and decision making within the professional environment and within the scope of institutional activities, including projects implemented or executed by Funbio and third parties, which are considered fundamental components of the institutional structure.

III. TO WHOM THE CODE APPLIES

7. To all of Funbio's collaborators and board members, suppliers, advisers, partner organizations and their legal or institutional representatives involved in projects funded by Funbio, and contractually obligated to the organization.

IV. FUNBIO'S MISSION, VISION AND VALUES

8. If Funbio is to achieve its goals, its collaborators and board members must be committed to pursuing its mission and upholding its vision and values. As such, it is paramount that its collaborators and board members adopt a deportment that aligns with and assertively expresses the institution's culture in their dealings with clients and coworkers, internally and externally.
9. Ethical behavior will enable one and all to participate in building the organizational culture and driving the institution's growth.

MISSION

To provide strategic resources for biodiversity conservation.

VISION

To be the benchmark in enabling strategic resources and solutions for the conservation of biodiversity.

VALUES

Funbio is guided by the following values: Transparency, Ethics, Receptivity, Effectiveness, Intellectual Independence and Innovation.¹

¹ A more detailed description of these values is provided in Annex I.

V. ETHICAL PRINCIPLES

- **V.1 Impartial decision-making**
- **V.2 Respect in interpersonal relations**
- **V.3 Integrity**
- **V. 4 Law-abidance**
- **V.5 Proper use of resources**
- **V.6 Environmental ethics**
- **V.7 Non-retaliation**

V.1. IMPARTIAL DECISION-MAKING

10. All decision-making by users of this Code must be impartial. Decisions must be taken in an independent manner, unencumbered by vested interests, influences or pressures that could prove detrimental to Funbio.
11. The users of this Code must not be party to deliberations or decisions that involve, or could be interpreted to involve, conflicts of interest.²

V.2. RESPECT IN INTERPERSONAL RELATIONS

12. The users of this Code must treat everyone with whom Funbio maintains a professional relationship with courtesy and respect.
13. Funbio repudiates all forms of prejudice, discrimination and harassment, and assumes the commitment to investigate³ and act upon any episodes of iniquity, humiliation, mockery, intimidation, hostility or embarrassment by virtue of color, race, gender, ethnicity, language, age, socioeconomic status, nationality, ancestry, kinship, parentage, religion or creed, physical, mental or psychological impairment, sexual orientation or political beliefs.

² See the definition of conflicts of interest in section VI of this document.

³ Allegations concerning breach of this code will be investigated by Funbio's Ethics Committee, as described in Section IX of this document.

V.3. INTEGRITY

V.3.1. FINANCIAL INTEGRITY

14. No user of this Code, or persons related thereto, may obtain financial advantage from participation in, execution of or possession of information concerning the user's professional activities and involvements.
15. Funbio does not tolerate bribery, illicit commissions, or any other form of irregular payment or in disagreement with Funbio's policies or objectives and operational or financial procedures in projects implemented or executed by Funbio and refuses to have anything to do with such practices, even if that means missing out on opportunities.
16. Funbio does not engage in any illegal behavior, including offering money or other benefits, either directly or through third parties, to any government authority or representative or any institution and its collaborators, whether public or private, in order to influence decisions, obtain or maintain business, or secure any undue advantage.
17. Funbio does not grant financial support or any other form of assistance to individuals with proven involvement in criminal activities, nor does it provide any aid in procedures through which individuals or companies can launder or conceal ownership of resources obtained by criminal means.⁴

V.3.2. NON-FINANCIAL INTEGRITY

18. Funbio and its collaborators do not accept, request or offer favors, hospitality or gifts, whether material or immaterial, intended to influence professional decisions, or which could be interpreted as so doing. Funbio and its collaborators must never act in any manner that could harm the institution's reputation or create a debt of reciprocity.

PRESENTS, GIFTS, HOSPITALITY AND COURTESIES

19. Item 18 observed, collaborators may receive gifts or courtesies so long as the value of those gifts does not exceed R\$ 100 (one hundred reais), USD 31 (thirty-one)⁵. Any gifts above this value must be submitted to the Ethics Committee, which might:

- Donate the items to charity in the name of the giver;
- Return the gift with a note declaring its receipt;
- Accept the gift on Funbio's behalf (not that of any specific collaborator).

⁴ See Funbio's Policy for the Prevention and Suppression of Money-Laundering and Terrorist Financing.

⁵ As per exchange rate on January 16, 2018.

20. The Ethics Committee may analyze cases in which doubt persists as to whether or not gifts, favors, hospitality or other benefits may be offered or received.

V.4. LAW-ABIDANCE

21. The users of this code must act at all times in accordance with Brazilian law and Funbio's decisions, rules and policies and hold themselves to the most exacting standards of integrity in their personal and professional lives.

22. Laws and regulations may vary depending on the country or state in which our partners are executing projects. As such, Funbio collaborators must inform themselves of the local legislation and, if in doubt, consult Funbio's Legal Department for guidance.

V.5. PROPER USE OF RESOURCES

23. The users of this Code are responsible for the funds entrusted to them and must observe and respect the norms and procedures set for their use, applying them solely and exclusively to ends authorized by Funbio and never for their own personal gain or that of third parties.

24. The use of information and data belonging to Funbio is subject to express authorization and must be duly credited (citing the source and date accessed).

V.6. ENVIRONMENTAL ETHICS

25. Funbio's decisions must be socially, economically and environmentally sustainable. Projects are to be developed in accordance with the best practices of environmental management, including impact assessment and the use of social and environmental safeguards, where applicable.⁶

V.7. NON-RETALIATION

26. Funbio will adopt zero tolerance for retaliation events. Retaliation means any harmful act, direct or indirect, against anyone who has submitted a complaint to the Ethics Committee, has provided any type of information to the Committee or contributed to the process of investigating complaints, and/or his/her relatives. Retaliation may include, for example, harassment, threats, violence, property damage, discriminatory treatment, harming or damaging, or threatening to harm or damage directly or indirectly, the person or any property of the person, the retention of any right and dismissal or deterioration terms and conditions of employment or any other position. This includes both active forms of retaliation (e.g., physical

⁶ For more details see Funbio's Environmental and Social Safeguards Policy
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violence, dismissal) and more passive forms of retaliation (e.g., retention of promotions, exclusion from participatory processes).

27. Funbio will adopt all possible measures within its reach to minimize or mitigate the risk of retaliation and address issues for the protection of those at risk, within its limits of its competence. Funbio has no direct power to physically protect people and does not intend to replace national or international judicial bodies, or law enforcement agencies whose functions include protecting the public in such situations.

VI. WHAT CONSTITUTES A CONFLICT OF INTEREST

28. Situations that create, or seem to create, a conflict between personal interests and those of Funbio are to be avoided. Professional decisions should always be based on discernment, objectivity and ethics, never on personal interests.

29. A conflict of interests occurs when there is a lack of impartiality on the part of a decision-maker in virtue of some secondary interest. Impartiality can also be compromised when the decision could favor or benefit individuals, institutions or companies in some form related to the decision-maker.

30. Conflict-of-interest situations are generally subjective, and therefore present themselves as ethical dilemmas. As such, it is important that the users of this Code be aware of this type of conflict and contact the Ethics Committee for guidance whenever in doubt.

VI.1.1. TYPES OF CONFLICT OF INTEREST:

31. There are various types of conflict of interest:

- Decisions that result in personal financial gain for the taker or some related third party;
- Decisions that result in non-financial benefit for the taker or some related third party;
- Use of unauthorized and/or confidential information;
- Unauthorized use of Funbio property for personal benefit, or that of third parties.

VI.1.2. HOW SHOULD A FUNBIO COLLABORATOR PROCEED IN A CONFLICT-OF-INTEREST SITUATION?

32. When a conflict of interests is suspected or identified, the collaborator must immediately inform his or her direct superior and/or contact the Ethics Committee via the established channels. The collaborator must then recuse him/herself from taking any necessary decisions in order to ensure their probity.

VI.1.3. HOW OTHER USERS OF THIS CODE (NOT FUNBIO COLLABORATORS) SHOULD PROCEED IN A CONFLICT-OF-INTEREST SITUATION?

33. When a conflict of interests is suspected or identified in the user's engagement with Funbio, this should be made known immediately to the professional's contact within the organization or through the established channels. The individual must then recuse him/herself from taking any necessary decisions in order to ensure their probity.

VI.1.4. IN CASE OF CONFLICT OF INTEREST, SANCTIONS ARE APPLICABLE

34. It is the obligation of the user of this Code to contact the Ethics Committee in case of identifying the existence of a conflict of interest in any activity that is supported or financed by Funbio. Failure to communicate about possible (or evident) conflict of interest may result in the sanctions listed below.

- Inclusion in Funbio's negative register, hindering new hires, support and/or partnerships;
- Suspension and cancellation of support;
- Contract termination;
- Return of funds;
- Identification of the person responsible through formal communication to the head of other partner institutions and/or government agencies when one of their employees does not communicate the possible conflict of interest within the scope of a project supported by Funbio
- Disabling the participation in evaluation or selection commissions in projects financed by Funbio.

VII. CHANNELS OF COMMUNICATION: INFORMATION, QUERIES AND REPORTING WRONGDOING

35. Funbio has two channels of communication for the exchange of information, clarification of doubts and reporting of ethical breaches by collaborators, board members, partners and suppliers working on Funbio projects.

Channel	Contact	When to use
Ethics Committee	comite.etica@funbio.org.br	Priority hotline for ethics concerns

External law firm	(21) 2533- 0471 denuncia.etica@funbio.org.br	Should be used only when the accusation in question concerns the Secretary General, some member(s) of the Ethics Committee or member(s) of Funbio's Deliberative Board
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36. Funbio encourages all collaborators and partners to use the ethics committee channel to obtain clarification concerning conduct. It is an important tool, especially when there is doubt as to whether or not a certain behavior constitutes an ethical breach.
37. Funbio repudiates accusations brought in bad faith.
38. Though not mandatory, Funbio strongly suggests that the reporting form (annex II) be used to facilitate process analysis.

VIII. CONDUCT WITHIN THE ORGANIZATION OR ON PROJECTS FUNDED BY FUNBIO

VIII.1. – POLITICAL EXPRESSION

39. Funbio understands that its collaborators, board members and other users of this code are citizens entitled to exercise their constitutional rights, including the right to political expression. However, party-political affiliations or preferences should be expressed privately, that is, without using institutional resources, channels or projects, and the Funbio logo and name must not be used or allowed to appear during acts of a political nature.
40. All users of this code are beholden to ensure that their professional activities and decision-making on Funbio's behalf are entirely free of party-political interferences.
41. Funbio and Funbio-funded projects are prohibited from supporting, by whichever means, political campaigns, candidacies and party-political events.

VIII.2. - INSTITUTIONAL REPRESENTATION OF FUNBIO

42. Funbio can only be represented by collaborators and board members and only when they have been specifically authorized to do so by the Secretary-General, in the case of collaborators, or by the Deliberative Board, in the case of board members.
43. Consultants hired by Funbio who advertise their work through social and/or professional networks must identify their work as consultants on such platforms.

VIII.2.1. REPRESENTATION OF FUNBIO BY THIRD PARTIES:

44. Unless specifically authorized to do so by the Secretary-General or Deliberative Board, consultants, suppliers and collaborators with partner institutions are not legally or institutionally entitled to represent Funbio or speak on its behalf.
45. Receipt of Funbio funding does not entitle the executing institution to represent Funbio or speak on its behalf.

VIII.3. - PRESERVING FUNBIO'S IMAGE AND GOOD STANDING

46. When attending professional meetings, external events and social gatherings, conducting business travel or using the social media, the users of this code must maintain a respectful professional demeanor in accordance with the local and multicultural norms.
47. This Code of Ethics is to be observed for as long as the individual or institution is contractually beholden to Funbio and any doubts concerning ethical/unethical behavior should be conveyed through the channels described in Section VII of this document.

VIII.4. - ANNUAL TRAINING/CAPACITATION OF THE FUNBIO TEAM

48. The Ethics Committee will organize annual training and top-up training on the issues raised in this code. Participation is mandatory.⁷
49. Consultations previously submitted to the Ethics Committee may guide training topics in the periods to follow.
50. All participants on the training program must sign a Term of Responsibility stating that they have understood the content of this document and that they commit to refrain from all transactions precluded therein. A model Term of Responsibility document is presented in Annex III of this Code.
51. Collaborators at the Procurement and Contracts Department are particularly exposed to ethical hazards. In light of that, in addition to this Code, these collaborators must also observe Funbio's procurement and contracts policies and procedures and the specific demands of each donor. For these collaborators, the Term of Responsibility includes an additional commitment.

⁷ Except for collaborators on vacation, medical leave or away on business at the time. In these cases, the Ethics Committee will evaluate the best form to administer the annual training at a convenient date.

IX. THE ETHICS COMMITTEE

52. The Funbio Ethics Committee's role is to ensure that this code is understood by its users and that they are able to apply it across the board of Funbio's activities and projects. In order to do that, the Committee maintains two channels of communication through which to receive and respond to queries and allegations (including those made anonymously), provided that they contemplate events that occurred within a period not exceeding one year before the date of filing the complaint or questioning.
53. The Ethics Committee, will act with impartiality and independence and will report to the Management Committee of Funbio's Deliberative Board, composed of the President, Vice-President and another advisor appointed by the President of Funbio, under the terms of articles 19, 40 to 44 and 50 in Funbio's By-Laws.
54. The Ethics Committee is responsible for accepting and processing grievances received in the light of the principles and rules of this Code and its procedures contained in the Internal Regulations of the Ethics Committee, as well as for providing feedback to whistleblowers.
55. The Ethics Committee may use *ad hoc* consultancy to conduct investigative processes when the situation requires, to guarantee the exemption and independence of the process.
56. The Ethics Committee will publish an annual report on grievances, guaranteeing the confidentiality of whistleblowers and observing the principle of non-retaliation.
57. Funbio's Ethics Committee is formed by four collaborators appointed by the Secretary-General. The duration of Ethics Committee mandates is two years, subject to one consecutive renewal.
58. Should any one member of the Committee be unable to attend a meeting, the other three members can proceed as scheduled.
59. The names of the present Ethics Committee members and the independent external law firm are registered by the Committee Coordination and published in the annual report on grievances on the Funbio website.
60. The Ethics Committee fulfills an educational, advisory and analytical role in ensuring that Funbio's ethical principles are upheld.
61. The members' functions include analyzing reported malfeasance and requests for information, the annual training of Funbio's collaborators, the drafting of a report on its actions, and analysis of the need to review the Code.
62. When queries or allegations are received, the Committee will make an official record and advise the collaborator on the best conduct to adopt. The record of the allegation or query will be included in an annual report on the Committee's activities.

The annual report details the number of doubts and complaints received and investigated, clarified, corroborated or dismissed any given year.

63. When investigating allegations, the complainant's express desire for anonymity should be respected, even if that hinders the investigation. Cases under Ethics Committee examination must not be discussed with non-members in any detail, unless otherwise instructed by the Committee.
64. As measures to reduce the risk of retaliation, the Ethics Committee will act with impartiality and maintain the confidentiality of the whistleblowers and the accused, maintaining their public grievance records free from any personal identification and maintaining confidentiality regarding the details of grievances between members of the Committee Ethics and, ultimately, the *ad hoc* consultants hired to process investigations and the supervisory Management Committee.
65. The Ethics Committee's articles of association must be approved by the Secretary General. These articles should list the goals and procedures of the Committee and how its activities are to be recorded and reported on.

IX.1. ETHICS COMMITTEE ANALYSIS AND RESPONSE PROCEDURES

66. Every query or allegation brought to the Ethics Committee's attention should be screened by posing the following question: Is this an ethical matter? If the answer is yes, the issue should be addressed and a recommendation made.
67. The committee must respond to the person raising the query or bringing the allegation, even in cases where the Committee sees no grounds investigation.
68. Ethics Committee recommendations must be made available to all users of this Code, in writing, so that they can help foster a better understanding of the issues in question and supplement, amend or clarify the Code where necessary.
69. The Committee can invite non-Committee members, including the complainant or query-maker, to participate in specific decisions.
70. The Ethics Committee may outsource independent consultants to carry out investigations into merit grievances. The Ethics Committee will monitor the work of these consultants and should prepare a standard ToR for these contracts. The outputs of these investigations must be confidential.
71. In the case of GEF or GCF Implementation Projects, Funbio will always use external consultants for the role of investigation.

IX.2. ETHICS COMMITTEE Reports

72. The Ethics Committee keeps detailed confidential records of each and every question or allegation it receives, and the recommendations that were made in each

case. This data must be reported to Funbio’s Deliberative Board, through its Management Committee, and published on Funbio’s website, without disclosing specifics issues, and in the institution’s annual report.

X. DEADLINES FOR DISCLOSURE, ADOPTION AND REVISION

73. This Code comes up for review on a three-yearly basis, during which any pertinent changes can be made. When changes are made, these should be amply disclosed to the team.
74. This Code is to be posted to the Funbio website and a link to the page should feature in every contract Funbio signs. All Funbio staff will receive annual (top-up) training on the use of this Code.

Annex I: Funbio’s Values

Funbio has 6 core values:



TRANSPARENCY

Transparency is one of Funbio’s core values. The transparent handling of information is key to our relationship with our various funding sources and partners, such as bi- and multilateral organizations, governments, private companies, third-sector organizations and communities.

Information regarding the projects and programs under Funbio’s management is fully and accurately disclosed and available for consultation on the Funbio website.

ETHICS

When we behave ethically, we earn the trust of our partners, clients, collaborators, the local communities in which we operate and of society as a whole. Maintaining this reputation requires an ongoing and lasting commitment to acting in accordance with the highest ethical standards in every decision we take.

We obey the law and comply with all regulations and directives that govern our work. In some cases, our values will demand that we adopt even more rigorous standards than those required of us by the existing legislation and regulations.

EFFECTIVENESS

Being effective means pursuing our projects and the commitments we undertake in such a way as maximizes their benefit for biodiversity whilst meeting the concerns of our partners. Our partners are crucial to the success of our activities. We will always work to understand and anticipate our partners' needs and to provide products and services of the highest possible quality and value.

RECEPTIVENESS

Though our focus is always on achieving our mission, Funbio will be receptive to input in all of its actions.

We will always be open to any organization, whether multilateral, public or private, that wants to contribute to our mission of providing strategic resources for biodiversity conservation.

Our relationship with our various partners must always be based on cordiality, civility, mutual respect and attention to the questions and problems they raise.

INTELLECTUAL INDEPENDENCE

All of Funbio's business decisions will be based on impartiality.

Whenever Funbio helps lobby in defense of its interests or to influence legislation, regulations or other governmental practices, it will do so within the bounds of the law and all applicable regulations concerning interaction with governmental authorities. All arrangements made with third parties representing Funbio in lobbying activities must be in compliance with the law and with the institution's own policies. No propaganda is permitted on any of Funbio's premises.

INNOVATION

Funbio strives for excellence in everything it does. We believe that there is always room for improvement and that innovation is paramount to that process. Innovation is therefore a value that is key to our success.



Our vision of being a benchmark in enabling strategic resources and solutions for the conservation of biodiversity is what drives us to stay abreast of nascent trends and open to unconventional ideas. Everyone at Funbio is encouraged to be attuned to the world and alert to new ideas.

Annex II: Questions to help structure allegations

In the interests of swift and thorough analysis, it is important that reports be made in the most detailed manner possible. Below is a list of questions that can help structure concerns being brought to Funbio's attention:

- Name of the person making the allegation (not mandatory, anonymity can be preserved)
- Should your name remain confidential?
- How can you be contacted? (preferably by e-mail);
- Objective description of the facts;
- Date on which the fact(s) occurred or started occurring; Did you witness the fact(s)?
- Do you have any material proof of the fact(s) (emails, letters, videos, etc)?
- Did/has anyone else witness/ed or learn/ed of the occurrence(s)? If so, can you say whom?
- Any other useful information (protocol number, etc).

Remember that all reports will be handled confidentially and discussed exclusively within the Ethics Committee or at the designated external law firm.

We may need to contact you for further clarifications or to make recommendations, so it is important that you leave some contact information.

Annex III – Annual Term of Commitment

I, _____, have received Funbio's annual ethics training administered in the year _____. My participation has enabled me to garner and refresh my knowledge of (tick as applicable):

- () Funbio's Code of Ethics and where to find it;
- () The ethical principles that are to guide my work at Funbio;
- () To whom Funbio's Code of Ethics applies;
- () The channels of communication through which to clarify doubts and report breaches, and how to use them;



() The names of the current Ethics Committee members and the Committee's function;

() what constitutes a conflict of interests and how to proceed when some such situation is identified or suspected;

() My responsibility, **as a member of the Procurement and Contracts team**, to incorporate Funbio's procurement and contracts procedures and policies, and those of its donors, into this Code of Ethics.

Considering the answers marked above, I hereby commit to comply with this Code of Ethics and divulge its content amongst Funbio's partners and suppliers as needed or whenever asked.

___ / ___ / ___

(Date)

(Collaborator's Name)

(Collaborator's Signature)