

# CIX Standards of Ethical Conduct

Version 1 (effective 28 Aug 2023)

### 1. Guiding Principles

- 1.1 Climate Impact X Pte. Ltd. ("CIX") recognises that the world faces considerable social, environmental and human rights challenges today.
- 1.2 CIX was founded with the mission of driving positive environmental impact at scale. It serves as a natural extension, that we believe it is important to behave in a socially and environmentally responsible manner as this is closely intertwined with who we are and the work that we do.
- 1.3 This belief is crucial to us delivering long-term value for our stakeholders, and hence, we are committed to the highest levels of ethical conduct in our business and operations.
- 1.4 We are committed to upholding the principles in the United Nations Guiding Principles on Business and Human Rights. This policy is also guided by the United Nations Universal Declaration of Human Rights.
- 1.5 CIX is incorporated in Singapore and our approach to human rights (including impact on human rights and how such impact should be managed) will respect the different economic, legal, social, cultural, historical, and religious backgrounds in Asia.
- 1.6 Our approach to human rights will seek to balance the relationship between individual rights and the obligations of individuals toward other individuals, their community and society.
- 1.7 We also recognise that no culture or society has a monopoly on the determination of human rights.

### 2. Scope and Objective

- 2.1 This policy applies to all CIX employees.
- 2.2 It articulates what we mean by good conduct, and should be embedded in all that we do, even when nobody is watching.
- 2.3 At all times, we must be mindful of the reputational consequences of all our actions, no matter how small or insignificant they might appear.

#### 3. Ongoing Monitoring

- 3.1 All CIX employees are expected to conduct themselves professionally and in line with the CIX Values and CIX Staff Code of Conduct ("Code of Conduct").
- 3.2 Should any employee be aware of potential adverse impact on human rights which is directly caused by our operations, products or services, they have a channel to raise a report to complaints@climateimpactx.com or directly to the CEO/COO.

## 4. Implementation and Remediation

- 4.1 CIX ensures that it has a framework to take appropriate measures to address actual or potential human rights impact identified.
- 4.2 If necessary, CIX shall consult experts, and shall prioritise measures that prevent and mitigate the impact that is most severe or where delayed response could make the impact irremediable.
- 4.3 If CIX has caused any actual adverse and material impact, CIX management will report this to the CIX Board of Directors and will take appropriate remedial actions.

# 5. Complaint Handling Process

- 5.1 In respect of its customers, CIX provides channels for feedback and complaints for all our customers through the CIX complaints handling process as part of the CIX Operating Procedures. Customers may email complaints to: complaints@climateimpactx.com
- 5.2 In respect of its employees, CIX has a whistleblowing policy for employees to raise whistleblowing reports without fear of negative repercussion. This is documented within the Code of Conduct.

#### 6. Employees

- 6.1 CIX values diversity at all levels of our company.
- 6.2 The aim is to ensure that our business policies and processes are non-discriminatory, promote diversity and inclusion and create a workplace environment where the uniqueness of individuals is valued a place where every employee feels

- empowered to be themselves and reach their full potential.
- 6.3 The unique contributions of a diverse workforce not only improve our service and products for our clients, but also drive the success of our business.
- 6.4 Our commitment to diversity and inclusion in CIX is articulated in the CIX Diversity & Inclusion Policy.

#### 7. Customers

- 7.1 We are committed to:
  - (a) delivering fair dealing outcomes for our customers. The Code of Conduct requires that all CIX employees treat our customers and stakeholders fairly at all times, and never intentionally misrepresent or mislead CIX customers and stakeholders.
  - (b) protecting and using customers' personal data in a responsible manner as set out in the CIX Data Protection Policy, CIX Access Management Policy, CIX Cryptography Policy, CIX Network Security Policy
  - (c) operating CIX platforms in a manner that upholds fairness, efficiency and transparency within the market. All CIX members are required to comply with the <a href="Code of Conduct for Participation">Code of Conduct for Participation in Climate Impact X (CIX) Platforms</a>.

#### 8. Business Considerations

- 8.1 In addition to our internal operations, CIX takes additional steps to ensure that the projects we support also adhere to Human Rights principles.
- 8.2 This commitment is an integral component of our internal quality assessment framework to which the carbon projects are subjected.
- 8.3 It serves as a critical facet of the social safeguards of each project we support, which include elements such as ensuring Free, Prior and Informed Consent prior to project implementation and equitable benefit sharing mechanisms.

#### 9. Reporting

- 9.1 CIX is committed to monitoring and reporting on all human rights issues in connection with the company as part of our internal policy.
- 9.2 Any potential or actual issues with significant human rights risks are recorded as part of the CIX Incident Management Policy.
- 9.3 Critical issues as determined by the CIX leadership team will be escalated to the CIX Board of Directors as appropriate.

#### 10. Governance

10.1 This policy is owned by the office of the COO and shall be reviewed on an annual basis to ensure the policy remains relevant and up to date with applicable law and regulation.

# **Document Revision History**

Version No.	Date	Summary of Changes
001	28 Aug 2023	Initial Version