



Environmental & Sustainability Policy

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Preamble

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil recognises that climate change, biodiversity loss, resource depletion, pollution, and the wider degradation of natural systems constitute urgent and material risks to human welfare, institutional integrity, and long-term global stability. The organisation further recognises that environmental responsibility is not a discretionary aspiration but a **core duty of governance, operational discipline, and ethical conduct**.

Accordingly, **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** adopts this **Environmental & Sustainability Policy** to establish a clear, enforceable framework for reducing environmental harm, improving resource efficiency, preventing pollution, and embedding sustainability throughout its activities, partnerships, procurement practices, and decision-making processes. This policy is designed to support climate mitigation and environmental stewardship in a manner consistent with the **Paris Agreement** and **United Nations Sustainable Development Goal 13: Climate Action**, while also reflecting broader internationally recognised principles of sustainable development, precaution, accountability, and intergenerational responsibility.

The organisation affirms that environmental protection is inseparable from human dignity, social resilience, and institutional credibility. Any practice that knowingly increases avoidable environmental harm, wastes finite resources, or disregards the ecological consequences of operational choices is incompatible with the values and standards of **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil**. This policy therefore establishes a commitment to **continuous improvement, measurable responsibility, and uncompromising environmental integrity** across the organisation's present and future operations.

1. Policy Statement

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil is committed to conducting its work in a manner that protects the environment, reduces greenhouse gas emissions, conserves natural resources, and minimises adverse ecological impacts. The organisation shall pursue environmental performance as a matter of **institutional obligation**, not as a symbolic or promotional exercise.

The organisation will seek to ensure that its operations are planned, delivered, and reviewed in accordance with the following principles:



- **Legal and regulatory compliance** in all jurisdictions where the organisation operates or has influence;
- **Prevention of pollution and waste**, rather than reliance on remediation after harm has occurred;
- **Reduction of greenhouse gas emissions** through practical, measurable, and sustained action;
- **Efficient use of energy, water, materials, and digital infrastructure**;
- **Integration of sustainability considerations** into procurement, travel, logistics, partnerships, and operational planning;
- **Transparency, accountability, and evidence-based improvement** in environmental performance;
- **Respect for ecological systems and community well-being**, recognising that environmental harm is frequently distributed unequally and therefore carries ethical as well as operational consequences.

The organisation shall not treat environmental stewardship as an ancillary concern. It shall be embedded in governance, budgetary planning, operational processes, and strategic decision-making. Where a proposed action would create avoidable environmental harm, the organisation shall prefer the **least damaging lawful and operationally viable alternative**.

2. Scope of Application

This policy applies to **all personnel, officers, directors, consultants, contractors, volunteers, collaborators, and representatives** acting on behalf of **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil**, whether their work is performed in physical offices, remote settings, field environments, digital systems, or through third-party arrangements.

The policy also applies, to the extent reasonably practicable, to the organisation's **procurement decisions, supplier relationships, project implementation, communications, events, travel, accommodation choices, and partner engagement**. Where external parties act on behalf of the organisation or materially affect its environmental footprint, their conduct shall be expected to reflect standards consistent with this policy.

No individual acting for or on behalf of the organisation may claim exemption from this policy on the basis of convenience, customary practice, cost preference, or operational habit where a more sustainable, lawful, and proportionate alternative is reasonably available.

3. Core Environmental Commitments

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil sets out the following priorities and intentions:

3.1 Climate Responsibility



The organisation shall actively work to reduce its contribution to climate change by identifying and addressing sources of direct and indirect emissions, including but not limited to energy consumption, travel, transportation, procurement, digital operations, and waste generation. The organisation shall seek to prioritise low-carbon and resource-efficient choices wherever operationally feasible.

3.2 Resource Stewardship

The organisation shall use natural and material resources with discipline and restraint. Energy, water, paper, equipment, consumables, and digital storage capacity shall be managed responsibly, with a preference for efficiency, durability, reuse, repair, and reduction over unnecessary replacement or excessive consumption.

3.3 Pollution Prevention and Waste Minimisation

The organisation shall avoid, reduce, and where possible eliminate sources of pollution, including air emissions, waste contamination, single-use materials, and improper disposal practices. Waste management shall be guided by the hierarchy of **avoidance, reduction, reuse, recycling, recovery, and responsible disposal**.

3.4 Sustainable Procurement

Purchasing and contracting decisions shall reflect environmental considerations alongside cost, quality, security, and service performance. Preference shall be given to products and services that demonstrate reduced environmental impact, responsible sourcing, longevity, and verifiable sustainability attributes. The organisation shall seek to avoid suppliers whose practices materially conflict with environmental responsibility.

3.5 Responsible Travel and Mobility

Where travel is necessary, the organisation shall prefer methods and arrangements that reduce unnecessary emissions and resource use. Remote participation, route efficiency, consolidated travel planning, and lower-impact transport options shall be considered before higher-emission alternatives, provided that operational integrity and duty of care are maintained.

3.6 Digital Environmental Responsibility

The organisation recognises that digital activity has physical environmental costs. Data storage, cloud use, communications infrastructure, device lifecycle management, and digital duplication shall therefore be handled with restraint, efficiency, and purpose. Unnecessary digital waste shall be avoided, and equipment shall be used for as long as is reasonably effective and secure.

3.7 Environmental Due Diligence and Ethical Consistency



The organisation shall not knowingly support, enable, or benefit from practices that involve serious or systematic environmental degradation where it has the capacity to identify and avoid such exposure through reasonable diligence. Environmental integrity shall remain consistent with the organisation's broader ethical standards and public mission.

4. Operational Standards

To give practical effect to this policy, **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** shall implement environmental considerations into routine operations, including but not limited to:

- **Energy efficiency measures**, including sensible use of lighting, climate control, devices, and equipment;
- **Paper reduction and digital-first practices**, except where physical documentation is required for legal, security, accessibility, or operational reasons;
- **Reuse and refurbishment of equipment and materials** where secure and appropriate;
- **Responsible waste segregation and disposal**, ensuring that hazardous, electronic, confidential, and general waste streams are handled lawfully and appropriately;
- **Reduced single-use consumption**, particularly where reusable alternatives are available and suitable;
- **Environmental screening in procurement and vendor selection**, proportionate to the scale and risk of the purchase;
- **Selection of venues, services, and logistics arrangements** that demonstrate responsible environmental practices where feasible.

These standards shall be applied with seriousness and consistency. Convenience, short-term expediency, and superficial compliance shall not justify environmentally negligent choices where a responsible alternative exists.

5. Governance, Accountability, and Oversight

The leadership of **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** bears ultimate responsibility for the implementation, maintenance, and continuous improvement of this policy. Environmental governance shall not be treated as a symbolic function but as an **integral element of organisational oversight**.

Management shall ensure that:

- environmental responsibilities are assigned clearly;
- relevant personnel understand the policy and their obligations under it;
- environmental risks are identified and addressed in operational planning;
- decisions with potential environmental consequences are reviewed with due seriousness;
- breaches, recurring failures, or material deficiencies are addressed promptly and transparently.



Where appropriate, the organisation may designate responsible persons or focal points to coordinate sustainability initiatives, monitor implementation, and recommend corrective actions. However, such designation shall not dilute the responsibility of leadership or the duty of every relevant person to act in accordance with this policy.

Any deliberate or negligent conduct that materially undermines this policy may be treated as a matter of **disciplinary concern, contractual non-compliance, or organisational misconduct**, depending on the nature of the relationship and the severity of the issue.

6. Monitoring, Reporting, and Continuous Improvement

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil is committed to **measuring what it can, improving what it can influence, and correcting what falls short**. Environmental performance shall be monitored using proportionate and credible methods suitable to the scale and nature of the organisation's activities.

The organisation shall seek, where practicable, to:

- identify relevant environmental impacts and priority areas for reduction;
- collect and review information that can support improvement;
- track progress over time against internal objectives or benchmarks;
- evaluate whether operational changes are producing real environmental benefit;
- revise practices in light of new evidence, better methods, or changing legal and operational requirements.

Reporting may be internal or external as appropriate, but it shall always be grounded in **accuracy, integrity, and restraint**. The organisation shall not exaggerate achievements, obscure shortcomings, or present aspirational intentions as completed outcomes. Environmental communication must be truthful, substantiated, and professionally responsible.

7. Training, Awareness, and Organisational Culture

The success of this policy depends not only on procedures, but on the **discipline and awareness of those who implement them**. The organisation shall promote a culture in which environmental responsibility is understood as a professional standard and a moral obligation.

Accordingly, personnel and relevant collaborators should receive guidance, instruction, or information appropriate to their roles regarding:

- the environmental implications of their activities;
- practical methods for reducing waste and resource use;
- expectations regarding sustainable procurement and travel;
- reporting channels for environmental concerns or non-compliance;
- the importance of decision-making that considers long-term ecological impact.



The organisation shall encourage a culture of accountability in which environmental harm is neither normalised nor excused. Silence in the face of avoidable damage is inconsistent with the values of **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil**.

8. Review and Revision

This policy shall be reviewed periodically to ensure it remains legally appropriate, operationally effective, and aligned with the organisation's mission, environmental obligations, and evolving best practices. Revision may be necessary in response to changes in law, changes in operational scope, material environmental incidents, new evidence, or emerging sustainability standards.

The organisation expects this policy to be a living instrument of governance, not a static declaration. Its authority lies in its implementation, its consistency, and its capacity to drive **measurable environmental responsibility**.

Conclusion

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil affirms that environmental stewardship is a matter of **serious institutional responsibility, ethical restraint, and long-term strategic intelligence**. The organisation shall therefore act with discipline to reduce environmental harm, conserve resources, and support climate action in a way that is credible, proportionate, and enduring.

This policy expresses the organisation's commitment to **responsible conduct, ecological accountability, and uncompromising respect for the environmental conditions upon which human security and social progress depend**.

I. ENVIRONMENTAL COMMITMENTS

A. Carbon Neutrality

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil ("CILC") hereby establishes carbon neutrality as a binding operational objective and a core expression of its institutional duty to conduct business in a manner that is environmentally responsible, scientifically defensible, and morally uncompromising. CILC intends to progressively reduce the greenhouse gas emissions associated with its activities over time, and aspires to establish a measurement baseline and realistic reduction pathways as its operations develop. This commitment applies across all operational, administrative, logistical, procurement, travel, and service-delivery activities under CILC's direct and indirect control, recognizing that meaningful climate responsibility must extend beyond narrow internal emissions and address the full practical footprint of the organization's existence.

CILC's carbon reduction pathway shall be implemented through a structured and evidence-based transition that prioritizes **renewable energy adoption, operational efficiency, and measurable**



emissions avoidance before reliance on offsets is considered. The organization shall pursue energy optimization across offices and facilities, adopt lower-emission technologies where operationally feasible, and embed sustainability criteria into procurement, mobility, and vendor management. **Offsets shall be used only for residual emissions that cannot reasonably be eliminated through direct reduction measures**, and any offset instruments utilized must meet rigorous standards of integrity, additionality, traceability, and permanence. CILC shall not treat offsets as a substitute for substantive decarbonization, but only as a final mechanism for unavoidable residual impact.

To preserve transparency, integrity, and accountability, CILC shall commission an **annual carbon audit by an independent third-party verifier** with appropriate technical competence and independence. The results of such audits shall be documented, reviewed at senior level, and made available through **public reporting in accordance with CDP disclosure standards** or equivalent recognized reporting mechanisms. CILC shall maintain records sufficient to demonstrate not only aggregate progress but also the credibility of the methods employed, ensuring that claims of climate responsibility are supported by verifiable evidence rather than aspirational language. **Environmental accountability shall be treated as a matter of institutional integrity, not public relations.**

B. Renewable Energy

CILC recognizes that the transition to clean energy is not merely a technical preference but an essential condition of responsible institutional conduct. Accordingly, CILC aspires to increase the share of renewable energy in its consumption over time, where local infrastructure, market conditions, and technical feasibility permit. This commitment shall be applied systematically across all offices, facilities, and operational sites under CILC's control or influence, with a view to ensuring that the organization's energy consumption aligns with global decarbonization imperatives and long-term climate resilience.

This transition shall be achieved through a combination of **on-site solar and wind installations where technically and economically feasible**, **Power Purchase Agreements (PPAs)** with credible renewable generators, and **grid-based renewable sourcing** in jurisdictions where direct procurement or embedded generation is the most effective mechanism. CILC shall evaluate energy procurement not solely on price, but also on carbon quality, contractual integrity, supply reliability, and legal enforceability. Any renewable sourcing arrangement shall be structured to ensure that environmental claims are substantiated by verifiable contractual rights and not undermined by double counting, misallocation, or insufficient chain-of-title documentation.

CILC further intends that **its offices be transitioned to renewable energy over time**, where local infrastructure, legal frameworks, and technical conditions allow such transition to be implemented without compromising essential operational continuity. Where direct transition is constrained by jurisdictional or infrastructural limitations, CILC shall adopt interim measures that accelerate compliance and demonstrate good-faith movement toward full renewable dependence. **Energy transition shall be treated as an operational duty, not an aspirational objective.** It is the



position of CILC that reliance on fossil-based power where viable renewable alternatives exist is inconsistent with responsible institutional stewardship.

C. Circular Economy and Waste

CILC intends to implement a circular economy approach that reduces waste generation, extends the useful life of resources, and eliminates avoidable environmental harm throughout its operational ecosystem. The organization intends to reduce the waste generated by its activities and to divert waste from landfill to the extent practicable, through prevention, reuse, and recycling, supported by appropriate documentation. This objective reflects CILC's position that waste is not an inevitable by-product of modern institutional activity, but often a consequence of inefficient design, poor procurement discipline, and weak lifecycle governance.

To achieve this target, CILC shall progressively eliminate **single-use plastics**, reduce paper dependency through a **digital-first operational model**, and implement composting programs wherever local infrastructure and waste composition make such measures viable. The organization shall favor durable, reusable, repairable, and recyclable materials in procurement decisions, and shall require that vendors and service providers demonstrate compatibility with CILC's waste minimization standards. Internal departments shall be expected to avoid unnecessary duplication, excessive packaging, and non-essential physical output where secure digital alternatives can achieve the same administrative purpose with lower environmental impact.

CILC shall also engage only with **certified waste management providers** or equivalent third-party contractors capable of demonstrating lawful disposal, material recovery, traceability, and compliance with applicable environmental regulations. Waste handling contracts shall include clear obligations regarding segregation, recycling, recovery, reporting, and lawful destruction where required. **CILC will not authorize practices that externalize environmental damage or conceal improper disposal behind superficial recycling claims.** Waste management shall be governed by the principle that materials must remain in productive circulation for as long as responsibly possible, and that final disposal is a last resort, not a default outcome.

D. Water Stewardship

CILC acknowledges that water is a finite and strategically significant resource, the stewardship of which requires foresight, discipline, and measurable restraint. The organization therefore intends to use water responsibly and to identify and correct inefficiencies in its consumption, in a manner proportionate to its operations and supportive of responsible facility management. This commitment applies to all premises under CILC's operational control and shall inform maintenance, procurement, infrastructure planning, and daily operational practice.

CILC shall implement **water-efficient fixtures and systems**, deploy **water-use monitoring mechanisms** to identify unnecessary consumption, and adopt **rainwater harvesting solutions where technically feasible, legally permissible, and operationally appropriate**. Water efficiency shall be considered at the design and retrofit stages of facility management rather than



addressed only after waste has occurred. CILC shall prioritize preventive conservation over reactive correction, recognizing that responsible stewardship requires the disciplined avoidance of unnecessary demand.

A **baseline water audit shall be completed in 2026**, after which CILC shall maintain **quarterly monitoring and internal review** of consumption trends, anomalies, and corrective action. The purpose of such monitoring is not merely to collect data, but to enable meaningful management decisions and to ensure that water use is aligned with operational necessity, environmental responsibility, and long-term resilience. **Water stewardship shall be enforced as a matter of institutional duty, not discretionary preference.** CILC rejects any model of operation that treats natural resource consumption as unlimited, unaccountable, or morally neutral.

II. SUPPLY CHAIN ENVIRONMENTAL STANDARDS

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil maintains a strict and non-negotiable environmental standard across its supply chain. The organization requires that all vendors, contractors, logistics providers, and other third-party partners operate in full alignment with applicable environmental laws, recognized ESG principles, and the highest standards of responsible commercial conduct. Environmental performance is not treated as a discretionary preference or a reputational consideration; it is an essential condition of engagement, continuation, and renewal. Any relationship that exposes the organization to environmental non-compliance, unacceptable ecological harm, or demonstrable disregard for sustainability obligations shall be subject to corrective action, suspension, or termination, as appropriate.

- **Vendor evaluation: ESG criteria are mandatory and form a fundamental component of procurement, selection, and retention decisions.** Every prospective or existing supplier shall be assessed against clear environmental criteria, including, without limitation, the possession of relevant environmental certifications, the existence of documented waste management systems, the implementation of emissions reduction measures, and demonstrable capacity for continuous environmental improvement. The organization expects suppliers to maintain lawful, transparent, and verifiable practices in relation to resource consumption, pollution prevention, hazardous material handling, recycling, packaging reduction, and environmental incident response. **No vendor may be approved solely on the basis of price, speed, or convenience if environmental deficiencies materially undermine compliance or sustainability objectives.** Where certification is claimed, it must be current, credible, and supported by evidence. Where environmental performance is represented through self-reporting, such statements must be capable of audit and substantiation. Suppliers must also demonstrate that environmental responsibility is embedded not only in policy language but in operational behavior, management oversight, and measurable outcomes. **A supplier that cannot prove compliance is not deemed compliant.**
- **Contracts: environmental compliance clauses shall be mandatory, enforceable, and expressly tied to performance and continuity of business.** All supply agreements shall include binding provisions requiring the supplier to comply with all applicable



environmental laws, regulations, permit conditions, and recognized industry standards, as well as any internal environmental requirements communicated by **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil**. Such clauses shall include, at minimum, obligations concerning lawful waste disposal, emissions control, prohibition of unlawful dumping or contamination, responsible handling of restricted substances, and immediate notification of any environmental breach, investigation, enforcement action, or material incident. Contracts shall also reserve to **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** an explicit **right to audit** supplier facilities, records, procedures, subcontracting arrangements, and corrective action measures, whether on a scheduled or unannounced basis where justified by risk, concern, or prior non-compliance. Suppliers shall be required to cooperate fully, honestly, and without obstruction in any review, inspection, investigation, or remediation process. **Material failure to comply with environmental obligations shall constitute a contractual breach of serious consequence** and may result in remedial demands, withholding of approval, suspension of purchasing activity, financial remedies, or immediate termination, depending on the gravity of the violation and the risk presented. The organization will not tolerate attempts to conceal deficiencies, misstate compliance status, manipulate records, or use subcontracting arrangements to evade environmental responsibility. **Accountability shall remain direct, traceable, and enforceable.**

- **Transportation: preference shall be given to low-carbon logistics, and travel shall be minimized through disciplined use of virtual communication.** In all logistics and transportation decisions, **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** shall prioritize the most environmentally responsible option that is operationally feasible, legally compliant, and proportionate to mission requirements. This includes a preference for low-carbon freight solutions, optimized routing, consolidated shipments, reduced empty runs, efficient load planning, and carriers that can demonstrate measurable emissions reduction practices. Where practical, the organization shall favor suppliers and logistics partners that use cleaner fleets, alternative fuels, or otherwise demonstrably lower-emission modes of transport. Packaging should be minimized, recyclable where feasible, and consistent with waste reduction objectives. In parallel, **virtual meetings, remote coordination, and digital document exchange are strongly preferred over unnecessary travel.** Physical travel must be justified by a legitimate business need that cannot reasonably be met through remote means. Even where travel is approved, personnel and partners must select the most sustainable available option consistent with safety, timing, and operational integrity. **Convenience alone shall never justify avoidable emissions.** Every travel and transportation decision must reflect a disciplined commitment to environmental responsibility, resource stewardship, and the principle that unnecessary carbon impact is professionally indefensible.

III. MONITORING & REPORTING

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil shall maintain a rigorous, transparent, and auditable monitoring and reporting framework designed to ensure that all sustainability-related claims, performance metrics, and climate commitments are supported by



verifiable data, consistent methodologies, and repeatable internal controls. The purpose of this framework is not merely administrative; it is to ensure that environmental performance is measured with **legal precision, operational integrity, and documentary accountability**, such that all disclosures may withstand internal review, external assurance, stakeholder scrutiny, and, where applicable, regulatory examination.

The organization shall track, at a minimum, the following core indicators on an ongoing basis: **kilowatt-hours of renewable energy procured or generated, tons of carbon dioxide equivalent reduced or avoided, waste diverted from disposal through recycling, reuse, recovery, or other qualified diversion pathways, and water saved through efficiency measures, conservation programs, and process optimization**. These indicators shall be measured using defined methodologies that are **consistent, comparable, and evidence-based**, with clear attribution criteria to distinguish direct operational impacts from indirect or estimated impacts. Each metric shall be supported by appropriate source documentation, including utility records, procurement confirmations, operational logs, waste transfer documentation, vendor certifications, engineering calculations, and any other records necessary to substantiate the reported values. Where assumptions, estimation models, or allocation factors are required, such assumptions shall be **explicitly documented, justifiable, and subject to periodic validation** to ensure that reported results remain reliable over time.

All sustainability data shall be subject to internal verification procedures designed to preserve the integrity of the reporting process. This includes data collection controls, segregation of responsibilities where appropriate, version control over datasets and methodologies, and management review prior to publication. The organization shall treat sustainability reporting as a formal corporate disclosure function, requiring the same degree of discipline applied to financial or compliance-related reporting. Accordingly, all information included in public or internal reports shall be reviewed for **accuracy, completeness, consistency, and materiality**, with any material restatements, methodological changes, or boundary revisions clearly identified and explained. The organization shall not overstate achievements, omit qualifying factors, or present aspirational statements as completed outcomes. All disclosures must remain **truthful, balanced, and substantively supportable**.

The **Annual Sustainability Report** shall be published no later than **June 30 of each year**, and shall present a comprehensive account of the organization's environmental, social, and governance performance for the relevant reporting period. The report shall be prepared in alignment with recognized reporting standards, including the **Global Reporting Initiative (GRI)**, **Sustainability Accounting Standards Board (SASB)**, and the **Task Force on Climate-related Financial Disclosures (TCFD)**, as applicable to the organization's business activities, operating footprint, and stakeholder expectations. Alignment with these frameworks shall not be treated as a cosmetic reference; rather, it shall reflect a substantive commitment to **comparability, decision-usefulness, and disclosure discipline**. The report shall address material sustainability risks, governance arrangements, performance trends, target progress, methodological updates, and any limitations affecting the completeness or interpretation of reported information. Where performance has materially changed from prior periods, the report shall explain whether such change reflects



operational improvement, expanded measurement coverage, baseline recalibration, or external conditions outside the organization's control.

In relation to climate strategy, the organization shall pursue **science-based targets** consistent with a **1.5°C-aligned decarbonization pathway** and shall seek validation of its emissions reduction targets in **2026** in accordance with the applicable science-based target framework and prevailing technical criteria. Such validation process shall be approached as a substantive test of credibility, not a symbolic endorsement. The organization shall ensure that its emissions baseline, reduction trajectory, boundary definitions, and emissions inventory methodology are sufficiently robust to support validation and long-term implementation. Any target submitted for validation shall be grounded in measurable operational levers, realistic execution assumptions, and governance mechanisms capable of driving sustained performance. The organization shall not adopt targets that are **directionally appealing but operationally unsupported**. Instead, it shall commit to targets that are credible, measurable, and capable of being monitored against defined milestones.

The reporting framework shall also support continuous improvement. Performance data shall be used not only to disclose outcomes, but to identify gaps, allocate resources, refine operating procedures, and accelerate corrective action where required. Deviations from target, underperformance against baseline, or deterioration in environmental indicators shall be investigated promptly, documented appropriately, and addressed through proportionate remedial measures. The organization shall regard underperformance as a matter requiring **transparent acknowledgment and corrective governance**, not selective disclosure or reputational minimization. In this respect, monitoring and reporting shall function as a mechanism of accountability, ensuring that environmental commitments are translated into measurable conduct and that public claims remain aligned with actual institutional performance.

Accordingly, **Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil** affirms that its monitoring and reporting obligations shall be carried out with **maximum factual rigor, disciplined governance, and unwavering fidelity to accurate disclosure**. Every reported metric, every published conclusion, and every climate-related commitment shall reflect a standard of professionalism consistent with the organization's institutional responsibility, ethical posture, and long-term commitment to sustainable, evidence-based operations.

IV. STAFF ENGAGEMENT & CULTURE

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil recognizes that the effectiveness of any environmental, sustainability, or resource-conservation framework depends not merely on written policy, but on the **consistent conduct, informed judgment, and ethical discipline of its personnel**. For that reason, staff engagement shall be treated as a core operational priority and an indispensable element of the Association's broader governance structure. Environmental responsibility is not to be regarded as a discretionary initiative, public-relations measure, or peripheral administrative function; rather, it constitutes a **binding organizational standard of conduct** that applies across all levels of employment, departments, locations, and working arrangements. The Association shall therefore maintain a culture in which sustainability is



understood as an integral part of professional performance, managerial accountability, and institutional integrity.

Training. The Association shall implement a mandatory **annual environmental awareness program** for all staff, with a minimum duration of two hours, to ensure that every employee receives clear, current, and practical instruction on the environmental expectations applicable to their role. This training shall be designed to provide more than general awareness; it shall equip personnel with the understanding necessary to act responsibly in day-to-day operations and to recognize the direct connection between individual behavior and collective environmental impact. The content of the program shall include, at a minimum, the principles of environmental stewardship, energy and water conservation, waste prevention and segregation, reduction of consumables, responsible use of office and field resources, environmentally conscious travel and commuting practices, compliant reporting of environmental concerns, and the employee's obligation to support sustainable operational conduct. Where relevant to specific functions, the training may also address procurement discipline, handling of sensitive or material resources, digital efficiency, remote-work sustainability, and escalation procedures for non-conformance or observed inefficiency. Training completion shall be monitored and documented, and participation shall be treated as a condition of good standing within the Association's internal compliance framework. The Association shall also retain the discretion to update the curriculum to reflect regulatory developments, operational lessons learned, technological improvements, and emerging environmental risks, thereby ensuring that the program remains **legally relevant, operationally effective, and morally rigorous**.

Green Team. The Association shall establish and support an employee-led **Green Team** as a structured internal mechanism for generating, reviewing, and advancing sustainability initiatives. The Green Team shall serve as a practical expression of staff participation, enabling employees to contribute ideas, identify inefficiencies, and propose improvements that strengthen environmental performance across the organization. Its function shall not be symbolic; it shall operate as a credible and empowered forum for translating environmental commitment into measurable action. The Association shall allocate a designated budget to support approved projects, pilot initiatives, awareness campaigns, operational trials, and other activities that demonstrably advance conservation, resource efficiency, waste reduction, or environmental responsibility. Budget allocation shall be administered with discipline and accountability, and all funded initiatives shall be subject to basic review criteria, including relevance, feasibility, expected impact, implementation quality, and consistency with the Association's overall mission and values. The Green Team may be cross-functional in composition and should, where practicable, reflect a diversity of departments, perspectives, and operational experience, so that sustainability is informed by practical insight rather than abstract aspiration. The Association shall encourage regular reporting, constructive recommendations, and collaboration between the Green Team, management, and operational staff, so that environmental improvement is pursued as an **organization-wide responsibility** rather than an isolated enthusiasm.

Incentives. The Association shall maintain a system of recognition and encouragement for employees who demonstrate measurable and sustained **conservation-minded behavior**. Such



recognition may include formal acknowledgment, commendation, performance-based consideration, internal awards, visibility in staff communications, or participation in incentive programs established by management. The purpose of these measures is not merely motivational; it is to reinforce the principle that responsible conduct, when exercised consistently and in good faith, is valued as an essential component of professional excellence. The Association may also support **green commute programs** and other practical measures that reduce environmental impact through commuting behavior, including encouragement of public transportation use, carpooling, cycling, walking, remote-work alignment where operationally appropriate, and other low-impact travel choices. Any such support shall be administered in a manner that is equitable, transparent, and consistent with applicable law and internal policy. Incentive structures shall be designed to promote genuine behavioral improvement, not superficial compliance, and shall therefore prioritize sustainable habits, credible contribution, and demonstrable alignment with the Association's environmental objectives. In all cases, the underlying expectation is that staff will act not only in observance of policy, but in accordance with a higher standard of **professional duty, institutional responsibility, and conscientious stewardship**.

Collectively, these measures are intended to ensure that environmental responsibility is embedded within the daily culture of Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil. The Association affirms that a sustainable organization is built through informed personnel, disciplined processes, visible leadership, and consistent reinforcement of ethical conduct. Accordingly, all staff are expected to understand that environmental performance is not an optional preference, but a **fundamental expression of organizational professionalism, accountability, and moral seriousness**.

V. GOVERNANCE & ACCOUNTABILITY

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil shall maintain a governance structure for sustainability that is not symbolic, discretionary, or purely aspirational, but **operationally binding, evidence-based, and subject to continuous oversight**. Sustainability governance shall be integrated into the organisation's broader system of internal control, strategic planning, risk management, and performance supervision, so that environmental responsibilities are treated as a matter of **institutional duty, executive accountability, and documented compliance**.

5.1 Sustainability Function

A dedicated sustainability function shall be established and maintained as the principal internal body responsible for monitoring, evaluating, and advancing the organisation's environmental commitments. the sustainability function shall comprise the Chief Executive Officer, the Chief Financial Officer, the Head of Programs, and one external expert appointed for their demonstrable competence in sustainability, environmental governance, climate-related risk, or comparable technical discipline. The inclusion of an external expert is intended to ensure independent scrutiny, specialist input, and protection against insular or self-referential decision-making.



It shall operate under a clear written mandate approved at the appropriate executive level and aligned with the organisation's strategic objectives, legal obligations, and ethical commitments. Its responsibilities shall include, without limitation: reviewing environmental performance against approved targets; evaluating implementation progress; identifying barriers, delays, and deviations; assessing emerging environmental risks and opportunities; and recommending corrective or preventive actions where performance is not on course. the sustainability function shall not function as a ceremonial advisory body. It shall possess the authority to require information, demand explanations, request corrective plans, and refer unresolved matters to executive leadership or the Board of Directors where necessary.

Sustainability review meetings shall be held at least quarterly and more frequently where the pace of implementation, the severity of risk, or the scale of deviation from target requires timely intervention. Meetings shall be minuted with precision, and records shall reflect the basis for decisions taken, matters deferred, escalations made, responsible persons assigned, and deadlines imposed. No material sustainability issue may be left undocumented, unassigned, or unresolved without formal acknowledgment of the reason.

5.2 Quarterly Review of Environmental KPIs

The organisation shall conduct **quarterly reviews of environmental key performance indicators (KPIs)** to ensure that sustainability commitments are measured with discipline, consistency, and transparency. These reviews shall assess performance against established baselines, interim milestones, and annual targets, and shall determine whether implementation remains on schedule, requires acceleration, or must be formally restructured due to operational, financial, or contextual constraints.

The KPI review process shall be **objective, measurable, and decision-oriented**. It shall not be limited to descriptive reporting, but must analyse the underlying causes of progress, delay, underperformance, or variance. Where targets are met, the sustainability function shall assess whether such achievement is sustainable and replicable. Where targets are not met or are trending materially off course, the sustainability function shall require a documented explanation, a corrective action plan, assigned ownership, and a firm deadline for remediation. **Repeated deviation, unexplained inaction, or avoidable slippage shall be treated as a governance issue, not merely an operational inconvenience.**

Environmental KPI monitoring shall be linked, where relevant, to program implementation, procurement choices, travel practices, facilities management, energy use, waste handling, and other operational domains that affect the organisation's environmental footprint. The purpose of this review is to ensure that sustainability performance is not abstracted from day-to-day operations, but is instead **embedded into the practical conduct of the organisation**. The review shall also identify any material opportunities for improvement, including efficiency gains, emissions reduction, resource optimisation, and risk mitigation.



5.3 Escalation of Delays and Corrective Action

Any delay, deviation, or failure to achieve a sustainability milestone shall be escalated promptly and proportionately. Delays shall not be normalised, obscured, or informally deferred. Where implementation falls behind schedule, the responsible officer shall provide a written explanation setting out the cause of the delay, the expected impact, the revised timetable, and the corrective measures proposed. The sustainability function shall evaluate whether the explanation is adequate, whether the delay is acceptable in light of the circumstances, and whether additional executive intervention is required.

Where delay is material, recurring, or indicative of systemic weakness, the matter shall be escalated to the President, and where warranted, to the Board of Directors. Escalation shall be treated as a mechanism of accountability, not punishment. Its purpose is to ensure that the organisation responds to emerging risk **before delay becomes failure and before failure becomes institutionalised**. If the delay arises from a resource constraint, the sustainability function shall determine whether the constraint is genuine, whether it is temporary, and whether the organisation has taken reasonable steps to reallocate, procure, substitute, or reprioritise in order to preserve sustainability objectives.

Corrective actions shall be documented, time-bound, and tracked to closure. **A corrective action is not complete because it has been proposed; it is complete only when implemented, verified, and shown to be effective.** Persistent non-performance shall trigger a formal review of root causes and may necessitate revision of targets, reassignment of responsibility, process redesign, or escalation to leadership for administrative decision.

5.4 Reporting to the Board of Directors and Strategic Oversight

The Board of Directors shall receive **an annual sustainability update** that is sufficiently substantive to permit informed oversight and strategic judgment. This report shall not be limited to a summary of achievements. It shall present a balanced and forthright account of **material environmental risks, opportunities, constraints, progress against targets, significant variances, and the adequacy of mitigation measures**. The report shall enable the Board of Directors to assess whether sustainability commitments remain credible, operationally integrated, and aligned with the organisation's mission and risk tolerance.

The annual update shall include, at a minimum: performance against environmental KPIs; material incidents or failures; corrective actions taken and their effectiveness; significant emerging risks or regulatory developments; resource implications; and strategic opportunities for improvement or innovation. Where relevant, the report shall also indicate whether management has exercised due diligence in identifying and addressing risks in a timely manner. **The Board of Directors must be presented with facts, not reassurance; with evidence, not aspiration; and with material developments, not selective narrative.**



If the organisation identifies a significant environmental risk, a material missed target, or an opportunity that could meaningfully improve performance, management shall bring the matter to the Board of Directors' attention without unnecessary delay and shall provide a clear recommendation regarding response, investment, reprioritisation, or policy amendment. Management oversight shall therefore be both retrospective and forward-looking: accounting for past performance while ensuring readiness for future obligations.

5.5 Accountability, Integrity, and Documentation

Accountability for sustainability shall rest with the executive leadership of the organisation, but it shall not be diluted by hierarchy or dispersed into anonymity. Each person involved in sustainability governance shall have clearly defined responsibilities, and those responsibilities shall be reflected in role descriptions, committee terms of reference, and internal reporting lines. **Where responsibility is assigned, performance must be measurable; where performance is measurable, it must be reviewable; and where it is reviewable, it must be acted upon.**

All sustainability-related decisions, assessments, approvals, escalations, and corrective actions shall be properly documented and retained in accordance with internal recordkeeping requirements. Documentation shall be sufficiently detailed to demonstrate the basis for decisions, the evidence considered, the risks identified, and the rationale for any departure from target, policy, or planned timetable. Such records shall be maintained not only for operational continuity, but also to ensure **auditability, traceability, institutional memory, and defensible governance.**

The organisation shall not tolerate concealment, understatement, or manipulation of sustainability information. Reports must be prepared and presented with candour. **Accuracy, transparency, and integrity are mandatory standards, not aspirational preferences.** Where uncertainty exists, it shall be stated plainly. Where progress is incomplete, it shall be disclosed honestly. Where shortcomings are identified, they shall be addressed decisively and without evasion.

5.6 Continuous Improvement and Governance Review

Governance arrangements under this section shall be reviewed periodically to ensure that they remain fit for purpose, proportionate to the organisation's activities, and responsive to evolving environmental, regulatory, and operational conditions. the sustainability function shall recommend any changes necessary to strengthen oversight, clarify responsibilities, improve reporting quality, or enhance the effectiveness of escalation and remediation processes.



Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil is committed to the principle that accountability is not satisfied by the existence of policy alone, but by the demonstrable discipline with which policy is implemented, monitored, enforced, and improved. In this regard, sustainability governance shall be treated as a permanent function of responsible leadership, grounded in **precision, seriousness of purpose, and moral and operational consistency.**

Signed by:

Dzianis Limarau

President, Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Date: 11 September 2026