



**FRIENDS OF SIAN KA'AN AC
POLICY AGAINST TERRORISM, FRAUD AND CORRUPTION**

February, 2017

MATERIAL SUPPORT AND RESOURCES TO TERRORISTS.

1. Associates, collaborators and contractors of Friends of Sian Ka'an, AC undertake not to commit, attempt to commit, advocate, facilitate or participate in terrorist acts, nor commit, attempt to commit, facilitate or participate in terrorist acts. Not knowingly provide material support or resources to any individual or entity that commits, attempts to commit, defends, facilitates or participates in terrorist acts, or has committed, attempted to commit, defended, facilitated or participated in terrorist acts.
2. That before granting any material support or resources to an individual or entity, associates, collaborators and contractors will consider all information about the individual or entity of which they are aware or that is available to the public.
3. That they will implement reasonable monitoring and supervisory procedures to protect any assistance they provide from being diverted to support terrorist acts.
4. Material Support and Resources means: cash, monetary instruments, financial securities, financial services, lodging, training, professional advice or assistance, safe houses, false documentation or identification, communication equipment, facilities, weapons, lethal substances, explosives, personnel, transportation and other physical goods, except medicines or religious materials.
5. Terrorist Act means: an act prohibited under one of the twelve United Nations Conventions and Protocols relating to terrorism, a premeditated, politically motivated act of violence perpetrated against non-combatant targets by sub-national groups or clandestine agents, or any other act that attempts to cause death or serious physical injury to civilians, or to any other person who is not actively participating in hostilities in a situation of armed conflict, when the purpose of said act, by its nature or context, be it intimidating a population, or inciting a government or international organization to do or refrain from doing any act.
6. Entity means: a partnership, association, corporation, or other organization, group or subgroup.

CURRUPTION

1. All Associates, collaborators and contractors of Friends of Sian Ka'an are obliged to observe the highest ethical standards and report any suspected act of fraud or corruption of which they become aware or are informed, during their relationship with the Association. The acts of fraud and corruption are prohibited. Fraud and corruption include acts of: (a) corruptive practice; (b) fraudulent practice; (c) coercive practice;

and (d) collusive practice. The definitions transcribed below correspond to the most common types of fraud and corruption, but are not exhaustive. For this reason, the Association will also take measures in the event of similar events or complaints related to alleged acts of fraud and corruption, even if they are not specified in the following list.

2. The Association defines, for the purposes of this provision, the terms that appear below

- to. A corruptive practice consists of offering, giving, receiving, or requesting, directly or indirectly, something of value to improperly influence the actions of another party;
- b. A fraudulent practice is any act or omission, including misrepresentation of facts and circumstances, that knowingly or through gross negligence deceives, or attempts to deceive, any party to obtain a financial or other benefit or to evade an obligation;
- c. A coercive practice consists of harming or causing harm, or threatening to harm or cause harm, directly or indirectly, to any party or its property in order to improperly influence the actions of a party; and
- d. A collusive practice is an agreement between two or more parties made with the intention of achieving an improper purpose, including improperly influencing the actions of another party.

3. If it is proven that any Associate, collaborator or contractor has committed an act of fraud or corruption, the Association may:

- to. Decide not to sign a contract for the acquisition of goods or services;
- b. Suspend disbursements of a procurement, if it is determined, at any stage, that there is sufficient evidence to substantiate the finding that an employee, agent or contractor representative has committed an act of fraud or corruption;
- c. Cancel any contract, when there is evidence that the contractor's legal representative has not taken appropriate corrective measures within a reasonable time and in accordance with current laws; I
- d. Refer the issue to the competent authorities.



FRIENDS OF SIAN KA'AN AC CONFLICT OF INTEREST POLICY

February 2017

The conflict of interest policy of Amigos de Sian Ka'an AC is designed to ensure the highest level of ethical conduct of people employed or involved in the administration of the organization and in everything related to it, with the purpose of avoid damaging public perception and avoiding adverse financial consequences to the organization that could arise from abuse or apparent abuse of the position or influence of any individual within the organization.

Whenever an Associate or the Executive Director has a conflict of interest or a potential conflict of interest involving the organization, he or she must give written notice to the President or another member of the Board of Directors of such situation.

When an employee, consultant or collaborator has a conflict of interest or a possible conflict of interest, they must notify the Executive Management in writing.

A conflict of interest may be defined as an interest that may affect, or reasonably appear to affect, the independence of judgment or conduct of an individual associated with Friends of Sian Ka'an AC.

A conflict of interest may exist when the interests or potential interests of a member of the Assembly of Associates, the Board of Directors, the Executive Director, employee, consultant or the close relatives of said persons (spouse, parents, children, cousins, nephews or in-laws) or any individual, group or organization over which said persons have influence, may be perceived as contrary to the interests of Friends of Sian Ka'an AC, or may call into question the independence of judgment or loyalty of said persons towards Friends of Sian Ka'an AC

For example, a conflict of interest may exist if a director, employee or family member:

1. Has a business relationship or financial interest with any third party that is in any negotiation process with Amigos de Sian Ka'an AC This does not include shareholding of less than 5% in private companies.
2. Serves on the Board of Directors, participates in the management or is employed by a third party that has a work or business relationship with Friends of Sian Ka'an AC (Includes any organization or business that receives funds from Friends of Sian Ka'an AC)



3. Receive any remuneration or any economic gain (in addition to salaries and benefits or fees) from a transaction involving Friends of Sian Ka'an AC

4. Receives gifts from a third party for their position in the organization. (Other than occasional gifts valued at less than \$1,000 MN). All other gifts must be returned to the giver with the explanation that the organization's policy does not allow receiving them. Personal gifts or money should never be accepted.

5. Is involved in other work or additional activity that interferes with the person's obligations to Friends of Sian Ka'an AC, involves the use of equipment, materials or facilities of the organization, or involves the costing or financing in whole or in part by part of Friends of Sian Ka'an AC from the other employment or additional activity.

6. Members of the Associate Assembly, the Board of Directors, the Executive Director, staff and independent consultants must not use information received through their participation in the affairs of Friends of Sian Ka'an AC, whether it is expressly considered confidential. or not, for personal benefit or against Friends of Sian Ka'an AC

When any conflict of interest requires the analysis of the Executive Management or requires the intervention of the Board of Directors, the interested person must notify it and must not be present at the meetings or discussions held to decide on the matter. However, this person must provide the committee or person in charge of resolving the matter with all relevant information about the particular situation.

The minutes of the committee meeting must indicate that the conflict of interest was revealed, that the interested party was not present at the meeting or discussion on the matter and that he/she did not vote.

A copy of this conflict of interest policy must be provided to anyone currently serving with Friends of Sian Ka'an AC as well as those who may in the future have a relationship or be associated with Friends of Sian Ka'an AC.

The Assembly of Associates, the Board of Directors and the Executive Management will have the power to decide on the solution to conflict of interest situations that exist.

The conflict of interest may cause the removal of associate status and the definitive cancellation of the employment contract for staff and external consultants.