



## CODE OF ETHICS

### I. PURPOSE

Greenpeace, Inc. and Greenpeace Fund, Inc. (hereinafter collectively as “Greenpeace”) are committed to the highest possible standards of ethical, moral and legal business conduct. In keeping with this commitment, this policy aims to ensure that all employees are aware of the level of conduct and integrity that is expected of Greenpeace employees.

### II. SCOPE

This policy applies to all Greenpeace employees, including part-time, temporary and contract employees.

### III. OBJECTIVES

The objectives of the Code of Ethics are to:

- A. Provide Greenpeace employees with guidelines for identifying potential conflicts of interest and breaches of trust;
- B. Help ensure that Greenpeace employees do not place themselves, or permit themselves to be placed, in a position which would constitute a conflict of interest or breach of trust;
- C. Correct and cure inadvertent minor violations without disciplinary action and in conformity with the purpose of this policy; and
- D. Promote high standards of professional conduct and values among Greenpeace employees.

### IV. RESPONSIBILITIES

- A. General Counsel. The General Counsel shall implement and administer the Greenpeace Code of Ethics. The General Counsel shall also ensure that the ethical standards set forth herein are promoted; and investigate any reported violation of this policy and approve and administer any subsequent corrective action.
- B. Department Heads. Department heads shall ensure that all employees under their supervision are familiar with the Greenpeace Code of Ethics. Department heads shall advise the General Counsel of any perceived violation of this policy by a member of their staff, and institute appropriate preventative or corrective action.

## **V. PROHIBITED CONDUCT**

- A. Disqualification from Greenpeace Activity. No current Greenpeace employee shall have a financial or other private interest, direct or indirect, personally or through a member of his or her immediate family, in any matter upon which the employee is required to act in the discharge of his or her professional duties. Where such conflict exists, the employee must disqualify himself or herself from acting or participating.
- B. Improper Use of Professional Position. No current Greenpeace employee shall use his or her official position for a purpose that is, or would to a reasonable person appear to be, primarily for the private benefit of the employee, rather than primarily for the benefit of Greenpeace.
- C. Improper Use of Greenpeace Property. No current Greenpeace employee shall use or permit the use of any Greenpeace funds or property under his or her professional control, direction, or custody for a purpose which is, or to a reasonable person appear to be, for other than Greenpeace's benefit.
- D. Acceptance of Gifts or Loans. No current Greenpeace employee shall solicit or accept any retainer, gift, loan, entertainment, favor, or other thing of monetary value from any person or entity where the thing solicited or accepted was, or to a reasonable person appear to be, solicited or accepted with intent to confer or obtain special consideration or influence as to any action by such employee in his or her professional capacity.
- E. Disclosure of Privileged Information. No current Greenpeace employee shall disclose or use any privileged or proprietary information gained through his or her professional position for the immediate or anticipated personal gain or benefit of the employee or any other person or entity; provided, that nothing shall prohibit the disclosure or use of information that is a matter of public knowledge, or that is available to the public upon request.

## **VI. REPORTING BREACHES OF THIS CODE**

Employees who have reason to believe that this Code of Ethics has been breached in any way are encouraged to bring their concerns to the General Counsel. No adverse action shall be taken against any employee who, acting in good faith, brings forward such information.

## **VII. CORRECTIVE ACTION**

Violation of this policy by any Greenpeace employee may constitute a cause for corrective action. Any reported violation of the Code of Ethics will be subject to

investigation by the General Counsel. If an investigation finds an employee guilty of breaching this policy, the corrective action pursued against the employee shall be commensurate with the nature and severity of the violation.

## **VIII. MODIFICATION & AMENDMENT**

Greenpeace reserves the right to modify or amend this policy as it may deem necessary.