The Global Biodiversity Standard

Code of Conduct

October 2026

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Policy owner	CEO, with Board oversight
Approved by	TGBS Ltd Board of Directors
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Next review	October 2028: Every two years, and after a material incident or governance change

The Global Biodiversity Standard (TGBS Ltd)

Code of Conduct

TGBS Ltd company policy

This Code sets the minimum conduct expected of everyone representing TGBS: integrity, respect, impartiality, safeguarding, responsible stewardship and prompt reporting of concerns.

1. Purpose

The Code translates TGBS values into practical standards. It supports trusted biodiversity certification and responsible international collaboration.

Covered persons must follow the Code whenever they act for, represent or could reasonably be associated with TGBS. Hubs must incorporate equivalent obligations into assessor and subcontractor arrangements.

2. Scope

This policy applies to TGBS Ltd directors, officers, employees, workers, consultants, contractors, volunteers and interns. It also applies, to the extent stated in contract or appointment terms, to TGBS hubs, certified assessors, technical reviewers, committee members, delivery partners and any other person acting for or representing TGBS.

3. Policy principles

3.1. Integrity and lawfulness

- Act honestly, lawfully and within delegated authority; never falsify records, evidence, qualifications, expenses, scores or claims.
- Do not commit or facilitate fraud, bribery, corruption, money laundering, terrorist financing, tax evasion, sanctions breaches or modern slavery.
- Declare actual, potential and perceived conflicts before acting and follow the decision on recusal or management.

3.2. Respect, equality and safeguarding

- Treat colleagues, communities, applicants and partners with dignity and respect, without discrimination, bullying, harassment, exploitation or retaliation.
- Respect Indigenous Peoples, local communities, knowledge holders, cultural protocols and free expression, while never treating culture or custom as justification for abuse or violation of human rights.
- Follow safeguarding requirements and report any risk to a child or adult at risk immediately.

3.3. Professional and certification integrity

- Be competent, evidence-based, impartial and transparent about limitations and uncertainty.
- Do not promise certification, predetermine results or allow payment, status, relationships or pressure to influence an assessment or review.
- Use the TGBS name, logo, certificate and intellectual property only as authorised and correct misleading claims when identified.
- Protect confidential, personal, commercially sensitive, traditional-knowledge and precise biodiversity-location data.

3.4. Resources, communications and environment

- Use funds, equipment, systems and time responsibly and only for authorised purposes.
- Communicate accurately and respectfully; obtain approval before speaking on behalf of TGBS or publishing confidential work information.
- Plan travel, fieldwork and procurement to manage safety, social and environmental impacts proportionately.

4. Roles and responsibilities

- The Board approves the policy, oversees material risks and ensures that allegations involving senior leadership are handled independently.
- The CEO implements the policy, assigns proportionate controls and reports material matters to the Board. A responsibility may be delegated, but accountability remains with the role that delegated it.
- Directors and managers model the required conduct, act on concerns promptly, protect reporters from retaliation and identify conflicts before taking part in a decision.
- All covered persons must understand the policy, complete required training, keep accurate records and raise concerns without delay.
- Each hub must nominate a responsible lead, cascade relevant requirements to assessors and subcontractors, maintain suitable local controls, comply with applicable local law, and report material concerns to TGBS. A hub remains responsible for its own legal duties and personnel.
- Assessors and reviewers must act impartially, declare conflicts, protect evidence and information, and never allow commercial or relationship pressures to affect their professional judgement.

5. Policy requirements

5.1. Gifts, hospitality and outside interests

Gifts and hospitality are permitted only within the thresholds and safeguards below. They must never influence, reward or appear to influence a certification, procurement, recruitment, funding or other decision.

Value or circumstance	Required action
Cash, cash equivalents, personal discounts, loans, kickbacks or anything	Never offer, solicit or accept, regardless of value.

Value or circumstance	Required action
offered to influence a decision	
Up to £50 for a single modest gift or hospitality item	May be accepted or offered only when lawful, infrequent, transparent, not connected to a live procurement/certification decision and incapable of creating an obligation. Record it if there is any doubt.
More than £50 for one item, or more than £150 in aggregate from/to the same source in a rolling 12 months	Declare in the Gifts and Hospitality Register within five working days and obtain prior written approval from the CEO where practicable.
More than £150 for one item; travel or accommodation; or hospitality involving a public official	Prior written approval from the CEO and one non-conflicted director. If the CEO is involved, approval must come from the Chair and another non-conflicted director.
A culturally significant gift that it would cause offence to refuse	Accept on behalf of TGBS, declare promptly, and agree whether it will be retained by TGBS, displayed, shared or donated. It must never affect a decision.

Covered persons must disclose outside work, ownership, close relationships or other interests that could affect TGBS work. TGBS may require recusal, reassignment, disclosure to affected parties or another proportionate control.

5.2. Acknowledgement and consequences

Directors, staff, contractors, hub leads and certified assessors must acknowledge the Code on appointment and when materially updated. Training or confirmation may be renewed periodically based on risk.

A breach may lead to advice, training, apology, restrictions, removal from work, disciplinary or contractual action, suspension or loss of assessor/hub status, certificate correction, recovery of loss or external reporting. The process must be fair, impartial and proportionate.

6. Reporting and escalation

A person may raise a concern orally or in writing and may be accompanied or supported where appropriate. Anonymous reports will be considered as far as the available information allows. Reports should include the facts known, relevant dates, people involved and any evidence that can be preserved safely.

Situation	Route
Ordinary route	Report to the CEO and copy the Board Chair or another non-conflicted director.
Concern involves the CEO	Report to the Board Chair and at least one other non-conflicted director. The CEO must not receive, direct or decide the matter.

Situation	Route
Concern involves the Board Chair	Report to the CEO and at least one other non-conflicted director. The Chair must not receive, direct or decide the matter.
Concern involves both the CEO and Chair, several directors, or internal independence is reasonably in doubt	Report to any non-conflicted director or to the Governance Contact, who must notify at least one other non-conflicted director and arrange an independent response. External professional advice or an external investigator must be used where necessary.
Immediate danger or suspected crime/regulatory breach	Contact emergency services, law enforcement or the relevant regulator where appropriate. Internal reporting is not a precondition.

The Board will maintain a current Policy Contact Register containing direct contact details for the CEO, Chair, Governance Contact and at least two other directors. The Governance Contact means the Company Secretary, if appointed, or a non-conflicted director designated by the Board.

No person may investigate, influence, decide or hear a review of a matter in which they are implicated or have an actual, potential or perceived conflict of interest. A report received by an implicated person must be forwarded immediately to a non-conflicted route without screening or alteration.

Retaliation, victimisation, obstruction, concealment, destruction of evidence and knowingly false or malicious allegations are prohibited. A report made honestly will not attract action merely because it is unsubstantiated.

7. Response and resolution

Concerns will be assessed promptly by a competent, non-conflicted person. TGBS will take proportionate interim and final action, give affected people a fair opportunity to respond where appropriate, document the outcome and track agreed actions to completion.

8. Confidentiality and records

Information will be shared only with those who need it to protect people, assess the matter, comply with law, obtain advice or take action. Absolute confidentiality cannot be promised where disclosure is necessary for a fair process or legal duty.

Records will be retained securely and only for as long as required by law, contract, the TGBS retention schedule or a legitimate operational need.

Personal data will be handled under the TGBS Data Protection Policy. Records must be factual, access-controlled and kept separately from general personnel or project files where sensitivity requires it.

9. Breaches and corrective action

A breach may result in corrective action, removal from an assignment, disciplinary or contractual action, suspension or termination of a hub or assessor relationship, recovery of losses, and referral to law enforcement or a regulator where appropriate.

10. Monitoring and review

The CEO will review implementation and report material issues and trends to the Board. The policy will be reviewed on the date shown in the control table and sooner after a material incident, legal change or significant change to TGBS activities.

11. Related documents and legal framework

All TGBS policies form part of this Code where relevant, particularly the Anti-Fraud, Anti-Harassment, Dignity at Work, EDI, Safeguarding, Data Protection, Modern Slavery, Whistleblowing, Complaints, Appeals and Conflicts of Interest policies. Applicable UK and local law must be followed.