The Global Biodiversity Standard

Complaints Policy

October 2026

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Policy owner	CEO, with Board oversight
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Next review	October 2027: Every two years, and after material learning from complaints

The Global Biodiversity Standard (TGBS Ltd)

Complaints Policy

TGBS Ltd company policy

TGBS welcomes complaints as a route to accountability and improvement. Complaints will be accessible, acknowledged promptly, handled by a non-conflicted person and distinguished from certification appeals, safeguarding and whistleblowing matters.

1. Purpose

This policy applies to complaints about TGBS services, administration, communications, conduct, delays, accessibility or the way TGBS, a hub or an assessor acted while delivering TGBS work. It is available to applicants, certificate holders, partners, community members and other affected persons.

It does not replace an employment grievance, a protected whistleblowing disclosure, a safeguarding report, a data-subject rights request or an appeal against a certification decision. TGBS will redirect a matter to the correct procedure and explain why, while preserving the original receipt date where practicable.

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

TGBS will apply this policy lawfully, fairly, consistently and proportionately, with effective oversight, documented decisions and protection from retaliation.

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.
- Hubs and assessors must make this policy accessible to affected stakeholders, forward TGBS-related complaints within two working days and must not decide complaints about their own conduct without TGBS oversight.

5. Policy requirements

Complaints may be made in writing, orally or through an authorised representative. TGBS will offer reasonable adjustments and accept submissions in another language where practicable. A complainant should provide contact details if they want a response, what happened, dates, people or project involved, supporting information and the remedy sought.

Anonymous complaints will be considered where enough information is available. TGBS may decline to investigate matters that are abusive, knowingly false, outside scope, already finally decided without new information, or so old that a fair review is no longer possible. Reasons will be recorded and communicated where possible.

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, but will not be treated as formal complaints. TGBS will assess whether the information can be independently verified, and no adverse finding will be based solely on an uncorroborated anonymous report. 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.
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.

A complaint about a hub or assessor must be notified to the TGBS Secretariat and handled with TGBS oversight. A complaint about the Secretariat follows the same conflict-free routes.

7. Response and resolution

1. Acknowledge receipt normally within five working days and identify the handler and applicable procedure.
2. Triage for safety, safeguarding, fraud, data protection, conflicts, certification consequences and urgent interim action.
3. Seek proportionate information from the complainant and relevant persons. The subject of a complaint must have a fair opportunity to respond where findings may affect them.
4. Provide a reasoned written response normally within 20 working days. Where more time is needed, explain why and give an updated date.
5. Offer a review by a person not previously involved if requested within 10 working days because of material new evidence, procedural error, conflict or an unreasonable outcome. The review outcome should normally be issued within 20 working days and is final under this policy.

Possible outcomes include an explanation, apology, correction, service improvement, reassessment under the appropriate process, contract or personnel action, referral to another policy, or no further action with reasons.

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

Failure to cooperate with a complaint, retaliation, concealment or repeated service failure may lead to management, contractual, hub or assessor action. Complaints revealing misconduct will be referred to the relevant policy without requiring the complainant to resubmit.

10. Monitoring and review

The CEO will maintain a complaints log and provide the Board with periodic anonymised information on number, type, timeliness, outcomes and systemic improvements. Personal or confidential detail will be limited to what oversight requires.

11. Related documents and legal framework

TGBS Certification Appeals Policy; Whistleblowing Policy; Safeguarding Policy; Anti-Harassment and Bullying Policy; Data Protection Policy; Code of Conduct.