The Global Biodiversity Standard

Equality, Diversity and Inclusion Policy

October 2026

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Policy owner	CEO, with Board oversight
Approved by	TGBS Ltd Board of Directors
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The Global Biodiversity Standard (TGBS Ltd)

Equality, Diversity and Inclusion Policy

TGBS Ltd company policy

TGBS will provide equal opportunity, prevent discrimination and design its employment, governance, certification and partnership activities so that diverse people can participate with dignity and fairness.

1. Purpose

TGBS operates internationally and values diversity of identity, discipline, geography, language, culture and lived experience. Decisions will be based on relevant, transparent criteria and reasonable steps will be taken to remove barriers.

- No unlawful discrimination, harassment, victimisation or retaliation.
- Fair access to recruitment, pay, development, contracts, committees, training, certification services and events.
- Reasonable adjustments for disability and accessible ways to participate or communicate.
- Respectful engagement with Indigenous Peoples, local communities and knowledge systems.
- Use of proportionate evidence to monitor outcomes and improve practice while protecting privacy.

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.

Under the Equality Act 2010, protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and sexual orientation. TGBS also expects fair treatment regardless of caring responsibilities, socio-economic background, language, location, contract type or other status protected by applicable local law.

- **Direct discrimination:** less favourable treatment because of a protected characteristic.
- **Indirect discrimination:** a provision, criterion or practice that disadvantages a protected group and cannot be objectively justified.
- **Harassment and sexual harassment:** unwanted conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- **Victimisation:** detrimental treatment because a person did a protected act, supported another person or was believed likely to do so.
- **Discrimination** arising from disability and failure to make reasonable adjustments are also prohibited.

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.
- People making recruitment, procurement, committee, assessor, award or certification-related appointments must use relevant criteria, declare conflicts and keep a proportionate record of the decision.
- Hubs must comply with this policy in TGBS work while applying local equality law. Where local law conflicts with TGBS's human-rights commitments, the hub must escalate before acting.

5. Policy requirements

5.1. Employment and appointments

- Use inclusive role descriptions, proportionate requirements and consistent assessment criteria.
- Advertise opportunities appropriately and avoid assumptions based on identity, accent, location, caring responsibilities or non-traditional career paths.
- Consider reasonable adjustments at recruitment and throughout the working relationship.
- Base pay, workload, development and progression decisions on transparent, relevant factors.

5.2. Services, certification and engagement

- Provide accessible information and reasonable alternatives for applications, consultations, training, complaints and appeals.
- Design site visits and stakeholder engagement to include affected groups safely and meaningfully, including people who face language, disability, gender, geographic or power barriers.
- Do not lower technical requirements, but provide equitable routes to understand and meet them.
- Avoid tokenism and do not collect sensitive equality data without a defined purpose, lawful basis and safeguards.

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.

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 substantiated breach may lead to correction of a decision, reasonable adjustment, training, management action, removal from a process, disciplinary or contractual action, or suspension/termination of a hub or assessor relationship.

10. Monitoring and review

The CEO will review relevant recruitment, participation, accessibility and complaint information in a proportionate and privacy-preserving way and report significant trends and actions to the Board.

11. Related documents and legal framework

- TGBS Anti-Harassment and Bullying Policy; Dignity at Work Policy; Code of Conduct; Safeguarding Policy; Data Protection Policy; Complaints Policy.
- Equality Act 2010; Human Rights Act 1998; Employment Rights Act 1996; applicable local equality, employment and human-rights law.