The Global Biodiversity Standard

Modern Slavery Policy

October 2026

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Approved by	TGBS Ltd Board of Directors
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The Global Biodiversity Standard (TGBS Ltd)

Modern Slavery Policy

TGBS Ltd company policy

TGBS prohibits slavery, servitude, forced or compulsory labour, debt bondage and human trafficking in its operations and relationships and will respond in a survivor-centred way when risk is identified.

1. Purpose

Modern slavery is a serious human-rights abuse and crime. TGBS will not knowingly work with a person or organisation that uses or facilitates it. Controls will be proportionate to TGBS's size and risks, including international hubs, fieldwork, labour-intensive restoration supply chains, recruitment, travel and accommodation.

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.

- Modern slavery includes slavery, servitude, forced or compulsory labour and human trafficking, including recruitment or movement through force, coercion, abuse of vulnerability, deception or control for exploitation.
- Indicators may include retention of identity documents, recruitment debt, withheld wages, threats, restricted movement, unsafe employer-controlled accommodation, excessive involuntary overtime, child labour, coercion or inability to leave work.
- A child is any person under 18. Hazardous work, exploitation and work below the lawful minimum age are prohibited.

3. Policy principles

- Risk-assess countries, sectors, labour models and tiers of delivery before significant contracts or partnerships.
- Use transparent recruitment; prohibit worker-paid recruitment fees, confiscation of documents and unexplained wage deductions in TGBS-funded work.
- Include modern-slavery, audit, information and termination clauses where risk justifies them and require equivalent flow-down to relevant subcontractors.
- Verify that pay, hours, freedom to leave, accommodation and health and safety comply with applicable law and fundamental labour standards where TGBS has relevant control or leverage.
- Use worker or community engagement that is safe, confidential and accessible; do not rely only on management interviews.

- Monitor higher-risk relationships and document remediation rather than using immediate termination where that could worsen harm, unless continued engagement is unsafe, unlawful or ineffective.

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.
- Those procuring goods or services must consider labour and recruitment risks, not rely solely on a contractual warranty, and escalate warning signs.
- Hubs and partners must apply equivalent standards to TGBS work, conduct proportionate checks on subcontractors and labour providers, and notify TGBS immediately of credible concerns.

5. Policy requirements

TGBS will maintain procedures, controls, and contractual requirements proportionate to the risks addressed by this policy.

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.
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	Report to any non-conflicted director or to the Governance Contact, who must notify at least one other non-conflicted director and arrange an

Situation	Route
directors, or internal independence is reasonably in doubt	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.

Do not confront a suspected exploiter or remove a potential victim without specialist or authority advice if doing so could increase danger. Prioritise immediate safety, informed choice, confidentiality and access to competent local support.

The response lead will consider reporting duties, law-enforcement or safeguarding referral, contractual measures, worker remedy, recovery of fees or wages, and whether certification evidence or claims are affected.

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

TGBS may require a time-bound remediation plan, repay recruitment fees or wages within its leverage, suspend payments or work, remove labour providers, terminate relationships, correct certification claims and report to authorities. Remedies should avoid penalising affected workers.

10. Monitoring and review

The CEO will review modern-slavery risks and controls annually and report material risks, incidents and remediation to the Board. Supplier and partner checks will be integrated with TGBS financial and counterparty due diligence.

11. Related documents and legal framework

- TGBS Safeguarding Policy; Code of Conduct; Whistleblowing Policy; Financial and Counterparty Due Diligence Policy; Anti-Fraud Policy.
- Modern Slavery Act 2015; Human Rights Act 1998; Employment Rights Act 1996; National Minimum Wage Act 1998; applicable local labour and trafficking law; relevant ILO fundamental conventions.