

Climate Impact Partners Supplier Code of Conduct

A Message from our CEO



At Climate Impact Partners, we are committed to the highest ethical standards and to making a positive impact in everything we do. This commitment has earned us the trust of our clients, project partners, suppliers, and peers.

Our purpose – delivering solutions for action on climate – drives us to act with integrity, innovate boldly, and empower each other and those we work with.

These efforts are guided by our core values:

- **Boundless, urgent ambition.** We are accountable, relentless, resilient.
- **Courage to innovate.** We are courageous, creative, curious.
- **Integrity without compromise.** We are trustworthy, credible, committed.
- **Empowered to serve.** We are respectful, inclusive, collaborative.

Our suppliers are essential to this mission. Our Supplier Code of Conduct outlines the standards we expect in areas such as ethical practices, environmental responsibility, human rights, and labour. It reflects our shared responsibility to deliver high-quality, credible climate solutions.

Thank you for your partnership and commitment to responsible business. Together, we can deliver lasting climate impact.

Sheri Hickok

Chief Executive Officer
Climate Impact Partners

1. Introduction

This Supplier Code of Conduct (“Code of Conduct”, or “Code”) outlines the principles and obligations that our suppliers must adhere to. This Code is designed to ensure that our suppliers operate responsibly, ethically, and sustainably, and adhere to internationally recognised laws, regulations, codes, standards, guidelines and best practices (together “Standards”) relating to human rights, labour rights, environmental sustainability and ethical business practices.

All project partners, suppliers, contractors, and subcontractors (together, “Suppliers”) engaged in providing goods and/or services to Climate Impact Partners must comply with this Code of Conduct.

Suppliers are also expected to apply the Standards, principles and obligations contained in this Code of Conduct to their own suppliers and subcontractors to ensure compliance throughout our supply chain. This includes conducting training and audits to verify adherence to these Standards.

We encourage our Suppliers to continuously improve their practices in line with this Code, and to document and report to us on their efforts. This includes staying informed about developments in Standards and implementing best practices in their operations.

If you have any questions about the Supplier Code of Conduct, please contact us at legal@climateimpact.com

Our Supplier Code of Conduct at a Glance

Compliance and Whistleblowing

- We require that our Suppliers comply with all applicable laws and regulations.
- We expect our Suppliers to act against corruption in all its forms. We encourage our Suppliers to foster a culture of integrity and transparency within their own supply chains, implement robust internal compliance programmes, and maintain whistleblowing procedures.

Human Rights and Labour

- Suppliers must respect and promote the rights and freedoms set out in the Universal Declaration of Human Rights and the International Covenant on Civil and Political Rights, and internationally recognised labour standards.
- Suppliers must uphold freedom of association and the right to collective bargaining, and must not engage in any form of forced or compulsory labour, child labour, or discrimination.
- We encourage our Suppliers to embed respect for human rights into their governance frameworks, and actively support initiatives that advance social equity, inclusion, and community well-being.
- We expect our Suppliers to actively foster workplaces that respect human dignity, promote equality, and empower individuals.

Performance, Integrity, Transparency, and Information Security

- Suppliers must conduct business with integrity, transparency, and professionalism. We expect high standards of performance and ethical behaviour across all operations.

Environmental Compliance and Stewardship

- Suppliers must operate in an environmentally responsible manner and comply with all applicable environmental laws and regulations.

Supporting the United Nations Sustainable Development Goals (SDGs)

- Suppliers are encouraged to build meaningful relationships with local communities and understand the social and environmental impacts of their operations. We expect Suppliers to contribute positively to the communities in which they operate and support the achievement of the SDGs.

2. Principles and obligations

2.1 Compliance and whistleblowing

2.1.1 We require that our Suppliers comply with all applicable laws and regulations.

Without limitation, we require that our Suppliers:

2.1.1.1 Comply with all applicable anti-bribery and corruption laws and regulations, including the US Foreign Corrupt Practices Act and the UK Bribery Act 2010. Suppliers must:

2.1.1.1.1 Not engage in bribery or corrupt practices, or facilitate corrupt payments;

2.1.1.1.2 Never, directly or indirectly, offer, promise, authorise, pay or accept money or anything of value (including, for example, gift, travel, hospitality, charitable donations or employment) to or from anyone, including but not limited to a Public Official¹ to influence any act or decision or to secure any other improper advantage; and

2.1.1.1.3 Ensure transparent and accurate monitoring, record keeping and enforcement procedures to ensure compliance with anti-bribery and corruption laws and regulations.

2.1.1.2 Comply with anti-money laundering and counter-terrorist financing laws, and do not engage with or assist any third parties to do the same.

2.1.1.3 Adhere to international trade controls, including import and export laws, sanctions, and embargoes.

2.1.1.4 Comply with competition laws and regulations, including antitrust laws that prohibit unfair business practices.

We expect our Suppliers to act against corruption in all its forms. We encourage our Suppliers to foster a culture of integrity and transparency within their own supply chains, implement robust internal compliance programmes, and actively promote ethical business conduct across all jurisdictions in which they operate.

¹ "Public Official" means any officer or employee of a government or any department, agency, state owned or controlled entity, public international organisation, any person acting in an official capacity for or on behalf of the above stated entities, any elected official, any candidate for political office, and political party officials.

- 2.1.1.5 We strongly encourage our Suppliers to maintain a process that allows employees and other stakeholders to raise concerns about actual or suspected misconduct, illegal activities, or violations of this Code, without fear of retaliation and in good faith. This process should:
 - 2.1.1.5.1 Ensure confidentiality and, where possible, anonymity;
 - 2.1.1.5.2 Prohibit any form of retaliation against individuals who report concerns in good faith; and
 - 2.1.1.5.3 Be clearly communicated to all workers in a language they understand.
- 2.1.1.6 If a Supplier is unable to address a concern internally or believes it involves Climate Impact Partners, they are encouraged to report it directly to us at legal@climateimpact.com or our secure whistleblowing platform: <https://www.safecall.co.uk/clients/climate-impact/>

2.2 Human rights and labour

- 2.2.1 Suppliers must respect and promote the rights and freedoms set out in the Universal Declaration of Human Rights, and the civil and political rights set out in the International Covenant on Civil and Political Rights. Without limitation, we require that our Suppliers:
 - 2.2.1.1 Are not complicit in human rights abuses.
 - 2.2.1.2 Conduct human rights due diligence to identify, prevent, mitigate, and account for how they address their impacts on human rights.
 - 2.2.1.3 Engage with stakeholders, including workers, communities, and civil society organisations, to understand and address human rights impacts.
 - 2.2.1.4 Take effective measures to remedy any adverse human rights impacts, including without limitation by providing access to effective remedies for individuals and communities affected by human rights abuses.

We encourage our Suppliers to embed respect for human rights into their governance frameworks, and actively support initiatives that advance social equity, inclusion, and community well-being.

- 2.2.2 Suppliers must respect and uphold internationally recognised labour standards, including the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the International Covenant on Economic, Social and Cultural Rights. Suppliers must uphold freedom of association and the right to collective bargaining, and must not engage in any form of forced or compulsory labour, child labour, or discrimination. Without limitation, we require that our Suppliers:
- 2.2.2.1 Adhere to fair labour practices, including providing fair wages and reasonable working hours.
 - 2.2.2.2 Provide a safe and healthy work environment in compliance with applicable health and safety laws. Hazards are to be identified, assessed and mitigated using the hierarchy of controls. Emergency situations must be anticipated, and appropriate plans and response procedures developed and implemented.
 - 2.2.2.3 Prohibit discrimination in employment or hiring based on race, colour, religion, gender, age, national origin, disability, or any other protected characteristic, and comply with applicable equal employment opportunity laws. Suppliers should promote diversity and inclusion and create an environment where all employees feel valued and respected.
 - 2.2.2.4 Maintain a workforce and workplace free of harassment, unlawful discrimination, and retaliation. There must be no harsh or inhumane treatment, including violence, gender-based violence, sexual harassment or abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse.
 - 2.2.2.5 Ensure products and services are accessible to persons with disabilities, in compliance with applicable accessibility laws. Communications should be accessible and provided in languages appropriate to the audience.
 - 2.2.2.6 Prohibit all forms of forced or compulsory labour. All work must be voluntary, and workers must be free to leave employment with reasonable notice and without penalty. Human trafficking must be strictly prohibited in all operations and supply chains.

- 2.2.2.7 Eliminate child labour. Suppliers must not employ anyone under the age required for completing compulsory education or under the legal minimum working age, whichever is higher.
- 2.2.2.8 Respect the right of workers to establish and join organisations of their choosing without prior authorisation, to bargain collectively, and to engage in peaceful assembly.

We expect our Suppliers to go beyond compliance and actively foster workplaces that respect human dignity, promote equality, and empower individuals. By creating safe, fair, and inclusive environments, Suppliers contribute to sustainable growth and shared success across the supply chain.

2.3 Performance, integrity, transparency and information security

- 2.3.1 Suppliers must conduct business with integrity, transparency, and professionalism. We expect high standards of performance and ethical behaviour across all operations. Without limitation, we require that our Suppliers:
 - 2.3.1.1 Deliver high-quality products and services in line with best industry practices. Suppliers should continuously seek to innovate and improve to meet evolving client needs.
 - 2.3.1.2 Exercise sound judgment when offering business courtesies. Any gifts, hospitality, or travel must be modest, transparent, and for legitimate business purposes. They must not be intended to influence decisions. Excessive or unclear gestures may be considered bribes or create conflicts of interest.
 - 2.3.1.3 Avoid conflicts of interest, including situations where personal or financial relationships may impair objective decision-making. Any potential conflicts must be disclosed to Climate Impact Partners, including relationships with Politically Exposed Persons (PEPs) or other parties that could raise integrity concerns.
 - 2.3.1.4 Maintain accurate and transparent records of all business dealings. Suppliers must implement monitoring and record-keeping procedures to ensure compliance with applicable laws and ethical standards. Supply chain operations must be transparent, providing visibility into sourcing practices.

- 2.3.1.5 Disclose information on human rights, health and safety, environmental practices, business activities, financial position, and performance in accordance with applicable regulations and industry norms. Records must be retained for at least seven (7) years.
- 2.3.1.6 Submit accurate and truthful proposals and invoices. Any discrepancies must be promptly reported and corrected.
- 2.3.1.7 Protect the confidentiality of sensitive information and comply with all applicable data protection laws, including the General Data Protection Regulation (GDPR).
- 2.3.1.8 Maintain an information security programme that reflects best practice for the Supplier's size and industry, ensuring resilience against cyber threats and data breaches.

We encourage our Suppliers to go beyond compliance by embracing a culture of integrity, accountability, and continuous improvement. This includes striving for excellence in performance, fostering transparency throughout the supply chain, adopting advanced security measures, and continuously innovating to meet evolving client needs. By setting high standards and seeking improvement, Suppliers help build trust, resilience, and long-term value across our shared value chain.

2.4 Environmental Compliance and Stewardship

- 2.4.1 Suppliers must operate in an environmentally responsible manner and comply with all applicable environmental laws and regulations. Without limitation, we require that our Suppliers:
 - 2.4.1.1 Comply with all applicable environmental laws and regulations.
 - 2.4.1.2 Support a precautionary approach to environmental challenges, promote environmental responsibility, and encourage the development and adoption of environmentally friendly technologies.
 - 2.4.1.3 Actively reduce negative environmental impacts through sustainable practices, such as reducing greenhouse gas emissions, conserving water, and minimising waste.
 - 2.4.1.4 Implement measures to improve energy efficiency, reduce water usage, and promote renewable energy sources.

- 2.4.1.5 Protect biodiversity and natural habitats, ensuring operations do not harm local ecosystems.
- 2.4.1.6 Disclose complete, consistent, and accurate Scope 1, 2, and 3 greenhouse gas (GHG) emissions data and/or components required to calculate GHG emissions.
- 2.4.1.7 Where relevant to operations:
 - 2.4.1.7.1 Minimise or eliminate emissions, discharges, waste generation, and noise pollution that may impair human rights or degrade ecosystems.
 - 2.4.1.7.2 Characterise, monitor, control, and treat air emissions (including volatile organic compounds, aerosols, corrosives, particulates, ozone-depleting substances, and combustion byproducts) as required before discharge.
 - 2.4.1.7.3 Identify, label, and manage hazardous chemicals, waste, and materials to ensure safe handling, storage, use, recycling or reuse, and disposal.
 - 2.4.1.7.4 Implement a water management programme that documents, monitors, and manages water sources, usage, and discharge.

We encourage our Suppliers to go beyond compliance by embedding sustainability into their core operations. This includes setting ambitious environmental targets, investing in clean technologies, and driving innovation to reduce carbon footprints and conserve natural resources. By championing environmental stewardship, Suppliers help protect ecosystems, combat climate change, and create a more sustainable future for all.

2.5 Supporting the Sustainable Development Goals (SDGs)

- 2.5.1 Suppliers are encouraged to build meaningful relationships with local communities and understand the social and environmental impacts of their operations. We expect Suppliers to contribute positively to the communities in which they operate and support the achievement of the United Nations Sustainable Development Goals (SDGs), particularly in the following areas:
 - 2.5.1.1 Poverty Reduction (SDG 1): Implement fair labour practices and provide decent wages to help reduce poverty.
 - 2.5.1.2 Gender Equality (SDG 5): Empower women and promote gender equality in the workplace.

- 2.5.1.3 Decent Work and Economic Growth (SDG 8): Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all.
- 2.5.1.4 Sustainable Cities and Communities (SDG 11): Ensure sustainable use of natural resources and promote sustainable urban development.
- 2.5.1.5 Climate Action (SDG 13): Support efforts to combat climate change and reduce greenhouse gas emissions.
- 2.5.1.6 Life on Land (SDG 15): Protect, restore, and promote sustainable use of terrestrial ecosystems, manage forests sustainably, combat desertification, and halt biodiversity loss.

3. Training

Suppliers are required to promptly complete any training mandated by Climate Impact Partners on this Code, and maintain documented evidence of all completed training, including attendance records, training materials, and assessments (where applicable). This documentation should be available for review upon request by Climate Impact Partners.

Suppliers should integrate learnings from training sessions into their internal processes and continuous improvement plans. This includes reviewing and updating internal procedures to reflect the latest professional standards and applicable laws.

4. Monitoring, reporting, audit and compliance

Suppliers should have a management system in place covering environmental, health and safety, human rights, information security, data privacy, incident management and ethical practices. This system should be aligned with the principles and obligations in this Code and aligned with the OECD Due Diligence Guidance for Responsible Business Conduct.

Management systems should be designed to: (a) ensure compliance with relevant laws, regulations, and customer requirements; (b) align with the principles and obligations in this Code of Conduct; and (c) identify and address operational risks associated with these areas, and support continuous improvement.

Suppliers are required to report on their compliance with this Code of Conduct. This includes:

- Conducting regular audits and assessments to ensure adherence to this Code of Conduct, at a minimum annually, but more frequently if Suppliers have high-risk operations or operate in high-risk environments.
- Reporting any incidents of non-compliance to Climate Impact Partners as soon as practicable, and in any case within 24 hours in the case of personal data breaches, and within 72 hours for all other breaches.
- Promptly taking corrective actions to address any breaches, including both immediate mitigation measures and long-term solutions to prevent recurrence.

Climate Impact Partners may audit, or engage a third-party auditor to audit, a Supplier's compliance with this Code of Conduct at any time, but no more than once per year unless Climate Impact Partners has reasonable grounds to believe that a Supplier is not in compliance with this Code. Suppliers must cooperate with such audits in good faith, and if any non-compliance is identified, implement immediate corrective measures as well as long-term solutions to prevent reoccurrence.

Non-compliance with this Code will be addressed through a proportionate response based on the severity and nature of the violation. This may include corrective action plans, formal warnings, or temporary suspension of activities. Termination of a Supplier's contract with Climate Impact Partners may occur in cases of serious or repeated breaches.

5. Annual acknowledgement

On an annual basis, an authorised representative from the Supplier must review and acknowledge this Supplier Code of Conduct and ensure that their employees, contractors and suppliers are aware of and comply with the Standards, principles and obligations contained in this Code of Conduct.

6. Additional resources:

- United Nations Global Compact Principles
- UN Guiding Principles on Business and Human Rights
- International Bill of Human Rights, including the Universal Declaration of Human Rights and the main instruments through which it has been codified: the International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights.
- International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- International Labour Organization's Core Conventions and Labor Standards
- United Nations Convention on the Rights of the Child Article
- OECD Guidelines for Multinational Enterprises
- OECD Due Diligence Guidance for Responsible Business Conduct
- International Covenant on Civil and Political Rights

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