

Whistleblowing and Reporting Policy

ClientEarth is committed to meeting the highest standards of integrity and accountability. We actively encourage and empower staff and others to call out suspected misconduct, and foster a culture in which everyone feels comfortable to do so without fear of retaliation, and with the confidence that concerns will be investigated and addressed. Providing the opportunity and means to report on misconduct at ClientEarth plays an integral role in our organisational accountability.

This Policy sets out ClientEarth’s process to ensure that reports of unlawful conduct or other misconduct are investigated appropriately, and persons speaking out against misconduct feel safe, protected, and informed.

This Policy has been drafted in consultation with our staff representative groups (i.e., Staff Voice and Unions) and approved by our Executive Team. It is designed to be legally compliant and reflects our values.

Values	Application in this Policy
Acting courageously	<ul style="list-style-type: none"> We encourage our staff, Partners, and Funders to speak out against unlawful conduct or other misconduct
Prizing diverse experience	<ul style="list-style-type: none"> We take reports seriously, and investigate appropriately, using (external) experts if needed to understand the wider context of reports
Embracing collaboration	<ul style="list-style-type: none"> We open our reporting channel to our staff, Partners, Funders, and the public at large, recognising their importance in our accountability
Learning continuously	<ul style="list-style-type: none"> We consider reports as an opportunity to identify weaknesses or patterns, and to improve our policies and practices
Opposing injustice	<ul style="list-style-type: none"> We provide and communicate on reporting channels, protect the identity of those who report, and take a zero-tolerance approach both to intentional false reporting and to retaliation
Focusing on impact	<ul style="list-style-type: none"> We maximise impact by addressing reports promptly and effectively, and by mitigating organisational risk

What is the Scope of this Policy?

This Policy applies to all ClientEarth entities and staff worldwide, including governance and management board members of all ClientEarth entities, who are expected to use best judgment in applying this Policy, and to play an active part in preventing non-compliance and in promoting best practices. This Policy will also be applied by ClientEarth vis-à-vis those associated with ClientEarth or those who work with or for ClientEarth, e.g., Partners or Funders, as well as to the public at large. This Policy, as well as our reporting channel accessible via the **TellUs** tab on [Transparency | ClientEarth](#), are made available to all.

ClientEarth’s Principles-Based Approach to Whistleblowing and Reporting

Principle 1: Those who witness or reasonably suspect misconduct must promptly report it

Anyone who knows about or reasonably suspects unlawful conduct, behaviour contrary to ClientEarth policies or values, or any other misconduct (e.g., improper, unethical, complicit, or obstructive conduct) that has occurred or is likely to occur at ClientEarth, or involves ClientEarth, should promptly report it. Our reporting channel is publicly accessible via the **TellUs** tab on [Transparency | ClientEarth](#).

This Policy does not preclude reporting of misconduct by other means (e.g., via a line manager, office management, People & Culture) but provides **TellUs** as a dedicated, secure, and independent channel for whistleblowing, in case the person with concerns or complaints feels more comfortable with this approach. As **TellUs** is ClientEarth's single repository for reports, reports of misconduct made by other means must then be conveyed by the recipient via **TellUs**, to ensure compliance with legal obligations.

Principle 2: Those who report misconduct in good faith are protected against retaliation

Anyone who in good faith reports misconduct within the scope of this Policy will be protected by ClientEarth from retaliation arising from the fact of their reporting or whistleblowing. ClientEarth has a zero-tolerance policy against any form of retaliation (including threatened or attempted). Those who retaliate will face disciplinary measures in line with local labour law, which may include termination of their employment.

Those who report, as well as related persons and companies, or those who facilitate reports, may also benefit from additional protections provided by local laws. These protections do not extend to protect the person who reports from the consequences of their own misconduct, if any, whether related to the report or not (i.e., it does not create a blanket immunity for the reporting person).

Principle 3: Reports are kept secure and identities are kept confidential

TellUs allows for the secure, sensitive, and confidential management of information. ClientEarth staff who are authorised to manage reports will take special care to ensure the confidentiality of the identity and identifying data of persons who report and those concerned by reports. Confidentiality can only be waived on limited legal grounds, with prior notification to, or consent of, the person who reports.

Principle 4: Anonymous use of the reporting channel is possible but is not encouraged

TellUs provides the option to use the reporting channel anonymously, using technology that wipes the metadata left by the reporter, to ensure that their identity remains confidential. However, **we encourage you to provide contact details with the report whenever possible**, as anonymous reports are more difficult to verify. ClientEarth will follow-up on anonymous reports to the extent possible, taking into account various factors (e.g., seriousness and credibility of the report, ability to confirm the allegation(s)). We advise that persons who report provide adequate and specific enough information to allow for the investigation of the facts (e.g., office of the misconduct, detailed facts on the wider context, identity of the person allegedly committing the misconduct (if any), identity of other witnesses for corroboration).

Principle 5: Intentional false reporting will not be tolerated

Persons who report false information intentionally will face disciplinary measures (e.g., warning, suspension, dismissal, or termination of employment), in line with local labour laws. In cases of malicious or vexatious allegations, ClientEarth or the persons concerned may also take legal action (e.g., defamation) against the person who made the report. Additional penalties may also apply under local laws to persons who knowingly report false information, breach confidentiality, hinder reports, or retaliate against them.

Principle 6: Reports will be investigated and managed in a timely, diligent, and impartial manner

Reports will be acknowledged, investigated, and resolved promptly. Feedback on the progress and outcome of the investigation will be provided to persons who report. Reports shall be investigated by (an) impartial, trained, and competent investigation officer(s). Decisions are to be clear, evidence-based, proportionate, fair, and recorded. Where necessary, ClientEarth will take responsibility and corrective measures for its actions or those of its staff, and identify trends for improvement of its processes.

Brussels Beijing Berlin London Warsaw Madrid Los Angeles Luxembourg

ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a non-profit limited liability company in Germany, ClientEarth gGmbH, HRB 202487 B, a registered foundation in Poland, Fundacja "ClientEarth Prawnicy dla Ziemi", KRS 0000364218, NIP 7010254208, a registered delegation in Spain, Fundación ClientEarth Delegación en España, NIF W0170741C, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836, a registered subsidiary in Japan, Ippan Shadan Hojin ClientEarth, corporate number 6010405022079, a registered subsidiary and company limited by guarantee in Australia, ClientEarth Oceania Limited, company number 664010655.