

Advocacy Policy

This Policy outlines the principles that guide ClientEarth's Advocacy activities, which may trigger legal and funder obligations, restrictions, or disclosure requirements related to regulated political activity, Campaigning, and Lobbying in the jurisdictions in which ClientEarth engages.

This Policy has been approved by ClientEarth's Executive Team, and reflects our values.

Values	Application in this Policy
 Courage	ClientEarth leverages the legal tools at its disposal to achieve impact, including proposing, inputting to, and supporting bold legal solutions.
 Collaboration	- ClientEarth engages (individually and in collaboration with Partners and the wider eNGO ecosystem) with and influences government bodies, political actors, and the public, who must each play their part in taking the measures necessary to protect people and planet. - ClientEarth collaborates internally across Systems and Departments, deploying relevant expertise and skills to support its Advocacy.
 Integrity	- ClientEarth is committed to engaging transparently, lawfully, and fairly with governmental bodies, political actors, and the public. - ClientEarth respects democratic institutions and processes, fairly and transparently participating in public debate, and actively building public trust in civil society.
 Care	- ClientEarth contributes to protecting communities from harm caused by misleading, coercive, or opaque Advocacy practices by ensuring its Advocacy is grounded in truth, not manipulation, and respecting the dignity and agency of the people affected by policy decisions. - ClientEarth cares for Staff by providing clear guidance to support and allow them to advocate confidently, without fear of crossing legal or ethical lines, and to avoid unnecessary risk.

What is the Scope of this Policy?

This Policy applies to all ClientEarth Group entities and Staff, including all board members when acting for ClientEarth, 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. Staff are responsible for avoiding, preventing, and detecting breaches of this Policy and reporting activities when required to by law. Staff non-compliance with this Policy could be considered as a breach of employment agreement, and could lead to disciplinary action by ClientEarth, in line with local labour law.

This Policy may also apply to those associated with ClientEarth or those who work for or with ClientEarth in some way, e.g., Partners or Funders, in certain circumstances. Partner or Funder non-compliance may result in the possible termination of appointments, contracts, or other formal agreements. We work with our Partners and Funders to ensure that they are aware of relevant obligations and raise concerns with us at the earliest opportunity. This Policy is publicly accessible to all, as is our TellUs reporting channel, which are available on [Transparency | ClientEarth](#).

ClientEarth's Principles-Based Approach to Advocacy

Principle 1: All Advocacy activities must clearly further ClientEarth's statutory purposes and its operative stated strategic objectives

Advocacy activities must be reasonably calculated to advance ClientEarth's statutory purposes and strategic objectives. Staff must clearly articulate how each planned Advocacy activity does so.

Principle 2: ClientEarth must ensure political party neutrality and independence from political parties and candidates at all times, and be especially diligent in election periods

ClientEarth must not express either support for or opposition to specific political parties or candidates, ever. Staff will seek to influence policy outcomes by engaging with multiple political parties and will avoid limiting engagement to a single political party, in order to ensure political party neutrality. Staff should pay particular attention to Advocacy activities in periods leading up to an election, when there may be both a heightened risk of appearing party biased and increased restrictions or obligations.

Principle 3: ClientEarth does not engage in Advocacy activities for hire or on behalf of others

While working in collaboration with Partners and in coalitions is encouraged, ClientEarth conducts its Advocacy activities in furtherance of its own statutory purposes and strategic objectives based on its own legal and subject matter expertise. ClientEarth does not engage in Advocacy activities for hire, or **on behalf of** third parties, including Funders, Partners, or coalitions.

Principle 4: ClientEarth will assess and comply with all laws and regulations applicable to specific Advocacy activities, including by disclosing activities on applicable registers where required

Staff must open an Advocacy File **for all Advocacy activities (whether undertaken by Staff in Programmes & Impact or in Communication, Public Affairs & Digital)** and carry-out an Advocacy Assessment confirming understanding of and a plan for compliance with applicable laws regulating or restricting those activities. The Advocacy Assessment is required to secure approval to launch an Advocacy File and commence Advocacy activities.

Principle 5: ClientEarth complies with Funder requirements, including United States 501(c)(3) limitations on Lobbying, where applicable, which may be stricter than or different from applicable national laws

In addition to complying with the laws and regulations of applicable jurisdictions when engaging in Advocacy activities, this Policy supports compliance with applicable Funder restrictions or requirements and enables ClientEarth to maintain 501(c)(3) equivalency status, allowing it to accept donations from U.S. non-profit organisations.

Principle 6: ClientEarth proactively manages risks related to coalitions and other collaborative working arrangements when engaging in Advocacy activities by following its contracting and Partner due diligence policies and procedures

Staff must be aware of, assess, and actively manage the risks inherent in engaging in Advocacy activities in coalitions or in collaboration with Partners. To ensure compliance with this Policy and these principles, Staff should agree and document the coalition's or collaboration's objectives, establish protocols clarifying roles and responsibilities, and outline how the alliance manages approvals of specific statements, campaigns, or policy asks.

Beijing Berlin Brussels London Los Angeles Luxembourg Madrid Tokyo Warsaw

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 The Joinery, 34 Drayton Park. London, England, N5 1PB 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 branch office 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.