



Green Claims Policy



Version: 1.0

Our Green Claims Policy

As proud signatories of The Anti-Greenwash Charter, we are committed to maintaining the highest standards in responsible marketing and communications. Our Green Claims Policy (GCP) outlines the principles and processes we follow to ensure that any environmental claims about our products or services are clear, accurate, and fully supported by evidence.

This policy covers all forms of marketing and communication across our organisation. This includes - but is not limited to broadcast media (webinars, podcasts and videos), digital channels (web, social media), events, trade materials, and all other professional promotional activities.

These evaluations review our marketing activity to confirm that all environmental claims are substantiated, transparent, and communicated with integrity.

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- The Competition and Markets Authority (CMA) Green Claims Code (UK)
- The Advertising Standards Authority (ASA) standards
- ISO 14021: Environmental Labels and Declarations
- The EU Green Claims Directive (where applicable)

Our Standards.

Transparency

We commit to clear, open communication regarding the environmental impact of verified emissions data. We do not conceal or omit relevant information and ensure that all disclosures are traceable to independently verified sources.

Accountability

Our verification processes are grounded in internationally recognised standards. We substantiate carbon-related claims with accurate, evidence-based data and maintain rigorous internal review procedures to ensure consistency and credibility.

Fairness

We use fair, clear, and unambiguous language when presenting verified data or comparisons. We avoid misleading framing and ensure that all contextual information is provided to support informed interpretation.

Honesty

We ensure that our verification outcomes reflect the actual environmental performance of the organisations we assess. Our actions and communications are aligned with our commitment to integrity and the principles of ISO 14064.

Where We Could Improve.

As an independent GHG verification body, we understand the importance of holding ourselves to the same high standards we expect from the organisations we assess. We are committed to continuous improvement in how we operate, how we support our clients, and how we contribute to the broader climate integrity ecosystem.

We regularly review our internal processes to identify areas where we can enhance efficiency, consistency, and transparency in our verification procedures. This includes evaluating our methodologies, training programmes, and quality assurance to ensure they reflect the latest best practices and evolving standards in climate reporting.

Additionally, we actively seek feedback from clients, partners, and our verification team to inform updates to our procedures and to support ongoing professional development. Where relevant, we also look for ways to minimise our own operational footprint, such as through responsible travel policies and engaging our team in sustainability awareness.

Our goal is to remain a trusted and credible voice in the climate space, continuously refining how we work to ensure our verification services contribute meaningfully to the integrity and accountability of climate action.

Our Practices.

At Carbonology®, as a third-party CDP Accredited GHG verification body, we are dedicated to maintaining the highest standards of transparency, accuracy, and accountability. As signatories of The Anti-Greenwash Charter, we recognise our role in safeguarding the integrity of environmental claims and ensuring they are both evidence-based and responsibly communicated.

To uphold these standards, we implement the following practices and procedures:

Clear Definition of Terms

All sustainability-related terminology used in our reports and communications is precisely defined and aligned with recognised frameworks such as the GHG Protocol and ISO standards.

Third-Party Verified Claims

Any claims made by Carbonology® are based on verified data, supported by robust methodologies and independent evidence, the same standard we apply in client engagements.

Authentic and Accurate Visual Representation

Visual content including charts, infographics, and report graphics is developed to reflect verified findings and avoid exaggeration or misinterpretation.

Editorial and Technical Review Process

All public-facing content is subject to a structured editorial process, and all verification reports undergo internal peer review to ensure methodological integrity, accuracy, and consistency with our internal standards and external frameworks.

Specialist Training for Staff

Our team receives ongoing training on responsible communication, evolving greenwashing risks, climate disclosure frameworks, and relevant regulatory updates.

Escalation Procedure

We have a formal process for escalating and addressing any concerns or potential issues related to our process, ensuring accountability and timely resolution.

Client and Stakeholder Education

Through our verification process, we guide clients on how to communicate their environmental claims clearly, responsibly, and in line with evidence - helping to elevate standards across the climate sector.

Support for Partners and Collaborators

We collaborate with partners to uphold shared principles of integrity and accuracy, providing constructive input where needed to strengthen their sustainability communications.

Regular Internal Review and Governance

Our processes and policies are reviewed regularly internally to ensure alignment with The Anti-Greenwash Charter and broader regulatory requirements.

Legal and Regulatory Compliance

We comply fully with all applicable marketing, advertising, and climate disclosure regulations in the jurisdictions in which we operate.

In addition, we use our code of ethics and terms and conditions which are publicly listed on our report proposals.

These practices reflect Carbonology®'s commitment to being a trusted, independent voice in climate accountability.

Green Terms Glossary.

Justification for Exclusion of Certain Environmental Claims Terminology

As a GHG verification body, our core services focus on the independent assessment and assurance of greenhouse gas (GHG) data, emissions inventories, and carbon footprint disclosures.

We do not manufacture or sell physical products, nor do we provide packaging or material-based goods. As such, terminology typically used to describe the environmental attributes of physical products including **Recycled Content**, **Recyclable**, and **Renewable Materials** does not directly apply to our operations or service offerings.

In line with the Anti-Greenwash Charter, we are committed to ensuring our environmental communications are accurate, relevant, and not misleading. Rather than including inapplicable claims, we focus our language on areas material to our business such as impartiality, credibility of GHG data, and adherence to internationally recognised standards (e.g., ISO 14064, GHG Protocol).

Where we do make sustainability-related statements (e.g., regarding our internal emissions reduction efforts or responsible business practices), we ensure they are substantiated, transparent, and proportionate to our role and impact.

For any information on our terms please contact enquiries@carbonologyhub.com

Verified Claims Database.

How We Support Credible Climate Claims

As a GHG verification body, we verify emissions-related disclosures to ensure they are specific, evidence-based, and aligned with internationally recognised standards. While we do not verify claims about materials, recyclability, or product footprints, we apply lifecycle principles as they relate to **organisational emissions across Scope 1, 2, and relevant Scope 3 categories**.

Claim/Scope	Verification Standard	Evidence Produced
Organisational GHG emissions (Scopes 1 & 2, and selected Scope 3)	ISO 14064-3 / GHG Protocol Corporate Standard	Independent verification statement (limited or reasonable assurance)
Net-zero or emissions reduction targets (corporate-level)	GHG Protocol / Science-Based Targets initiative (SBTi) criteria*	Assurance report or verification letter aligned with target criteria
Annual GHG disclosures for regulatory or voluntary reporting (e.g. CDP, SECR, CSRD, etc.)	Relevant disclosure frameworks; ISO 14064-3	Verified GHG inventory, submission-ready documentation

**Note: We verify the emissions data and progress toward targets, not the SBTi validation itself.*

Use of Imagery & Colour

Visual Representation Statement

We recognise that imagery and colour can influence perceptions of environmental responsibility. As a GHG verification body, we commit to using visual content that accurately reflects our role and avoids any risk of greenwashing.

We use imagery and colour palettes that are either part of our own brand or supplied by our clients, particularly in case studies, webinars, and joint materials.

Green tones or environmental visuals are only used where they align with verified claims or appropriate context.

All visual content is reviewed by the marketing team to ensure it supports honest and transparent communication. For any queries, please contact enquiries@carbonologyhub.com.

Editorial Processes.

To ensure our communications are accurate, transparent, and aligned with the Anti-Greenwash Charter, we follow a clear editorial process:

All content containing environmental or emissions-related claims is reviewed by at least two team members typically from technical and communications teams prior to publication. We reference our internal list of defined terms and approved claims, which is regularly updated to reflect evolving standards and best practice.

Where new or complex terms are introduced, we require clear justification and, where applicable, external referencing.

Staff are encouraged to raise concerns about potentially misleading content, and we actively recognise those who help uphold our standards.

Any internal queries about green claims are discussed openly, with a focus on resolving ambiguities and maintaining integrity. Our glossary is updated regularly.

Training.

As an accredited CDP verification body, our role is to provide assurance and verification of greenhouse gas emissions and sustainability reporting. While we do not operate a formal in-house anti-greenwash training programme, we ensure staff remain aware of our responsibilities through:

Employee Handbook: Clear documentation of the Green Claims Policy and the Anti-Greenwash Charter is available for all employees.

Onboarding Induction: New employees are introduced to the policy and charter during the induction process to ensure they understand the importance of accurate and responsible communication.

Webinar Learning: Staff are directed to external training resources such as our EU and UK Green Claims webinars – hosted with Graf Von Westphalen LLP & Mills & Reeve LLP, which provide regulatory updates and context.

Annual Policy Review: This policy and the Anti-Greenwash Charter will be reviewed annually. Updates are communicated to staff through the Employee Handbook and internal announcements.

This approach ensures employees remain informed of best practices, understand the risks of greenwashing, and can contribute to maintaining our standards of accuracy, transparency, and compliance.

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Green Claims Policy

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Navigating the EU and UK Green Claims Directive 20250703 135616 Meeting Recording

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Sustainability & Compliance

Carbonology® Green Claims Policy & The Anti Greenwash Charter

We are committed to ensuring that all environmental and sustainability claims are accurate, evidence-based, and compliant with UK and EU regulations. As an accredited CDP verification body, our role is to provide independent assurance on greenhouse gas emissions and sustainability reporting. While we do not produce marketing claims, it is important that all employees understand our responsibility to avoid greenwashing and to communicate with integrity.

Induction: New employees are introduced to the Green Claims Policy and the Anti-Greenwash Charter during onboarding.

Reference: This Handbook contains a summary of these commitments, and employees are directed to [EU and UK Green Claims webinars for further awareness](#).

Ongoing Updates: The Green Claims Policy and Charter are reviewed annually. Updates are shared with all staff via this Handbook and internal announcements.

All employees are expected to familiarise themselves with this guidance and to uphold our standards of accuracy, transparency, and compliance.

Evidence Type	Description	Location (File/Link)
Handbook Update	Section on Green Claims Policy & Anti-Greenwash Charter	Screenshot above
Policy Update	Training & Awareness section added	Screenshot above
EU & UK Green Claims Webinar	EU Green Claims webinar, [date], link provided	<u>Screenshot and link here</u>

Use of AI

As part of Carbonology®'s ongoing commitment to innovation and efficiency, we incorporate artificial intelligence (AI) tools into our content creation processes. These tools support the drafting, editing, and refinement of materials, helping us to produce high-quality content at scale.

However, we recognise that the use of AI requires careful oversight to ensure that all outputs are consistent with the standards set out in our Green Claims Policy and the wider principles of our Charter. While AI may support parts of our process, we do not distinguish between AI-assisted and human-generated content, as all outputs are held to the same rigorous standards of quality, ethics, and compliance.

To maintain these standards, we take the following steps:

Human Oversight and Review: All content generated or assisted by AI is subject to human review prior to publication/ submission. Our team ensures that the information is accurate, contextually appropriate, and aligned with our environmental commitments.

Ethical Use of AI: We use AI responsibly and do not permit the generation of misleading, exaggerated, or unverifiable claims. AI is never used to fabricate data or simulate endorsements relating to environmental performance.

Compliance Assurance: AI-generated content is reviewed against our Green Claims Policy to ensure full compliance with relevant regulations and industry best practice. This includes verifying that all claims are substantiated, transparent, and unlikely to mislead consumers.

Continuous Improvement: We regularly assess the performance of AI tools and update our oversight procedures to reflect evolving technologies, standards, and regulatory guidance.

Escalation Procedure.

As proud signatories of **The Anti-Greenwash Charter**, we are committed to upholding its standards across all our communications. We encourage you to consider the full context in which any claims are made within this content. For further details, or to share feedback or concerns, please review our **Green Claims Policy**.



Purpose

As an ISO 14064 verification body, we are committed to upholding the integrity of climate-related disclosures and ensuring that carbon claims made by certified organisations are accurate, transparent, and free from greenwashing. This escalation procedure provides a clear pathway for stakeholders to raise concerns about potentially misleading or unclear claims related to carbon accounting, offsetting, or reduction.

Stakeholder Engagement

We recognise that our stakeholders—including clients, consumers, regulators, and civil society—play a vital role in maintaining the credibility of verified carbon claims. We actively encourage feedback and view it as an essential component of continuous improvement.

Review Process

Once a concern is submitted:

- It is acknowledged within **10 working days** and a preliminary review is conducted to assess the nature and validity of the concern.
- If warranted, the issue is escalated to an **independent reviewer** or internal audit team. The independent reviewer provides impartial oversight and ensures that the investigation is fair, transparent, and free from conflicts of interest.
- We may request additional information from the certified organisation to clarify the claim in question.

Possible Outcomes

Following the review, outcomes may include:

- Clarification or amendment of the original claim
- Recommendations for improved communication or disclosure
- In serious cases, corrective actions such as public retraction or suspension of certification

If you have any questions or feedback on this policy or our green claims, please contact enquiries@carbonologyhub.com for clarification. Alternatively, you can submit any greenwashing concerns directly to The Anti-Greenwash Charter for an independent review [here](#).

Stakeholder Education.

Our Approach

Educating stakeholders on sustainability and carbon-related issues is central to our mission. We believe that informed stakeholders are better equipped to interpret carbon disclosures accurately and engage meaningfully with climate-related claims. Our strategy focuses on making complex environmental topics accessible, relevant, and engaging across a range of platforms.

Content & Communication

We produce educational content that explains the environmental impact of products, services, and industry practices, with a particular emphasis on emissions reporting and carbon accounting. This includes:

- Clear guidance on environmental standards
- Updates on relevant frameworks and methodologies
- Insights into developments in climate regulation and reporting
- Our content is shared through professional channels such as LinkedIn and our Carbonology® hub where we regularly post updates, thought leadership pieces, and commentary on evolving standards and best practices.
- Thought Leadership

Our founder, Melanie Blackmore, plays a key role in stakeholder education through: Regular podcasts that explore environmental claims, carbon verification, and sustainability communication

Webinars and panel discussions with industry experts and academic partners
Holds a master's by Research degree specialising in environmental verification, providing her with a strong academic foundation in sustainability governance and the principles of independent assessment.

Speaking engagements at environmental events and exhibitions

These platforms allow us to share insights, clarify misconceptions, and promote transparency in carbon-related communications and industry.

Continuous Learning

We view stakeholder education as an ongoing process. By combining verified data with accessible messaging, we aim to foster a culture of informed engagement and responsible climate communication.

Partnerships & Collaborations.

At Carbonology®, we believe that strong, transparent partnerships are essential for advancing credible climate action and promoting responsible carbon management practices. Our collaborations are grounded in shared values, mutual accountability, and a commitment to integrity in climate-related communications.

We work closely with carbon accounting software providers to ensure the accuracy and reliability of emissions data. These partnerships enable us to combine robust, science-based accounting tools with our independent verification and assurance services.

This clear separation of responsibilities ensures that data measurement is handled with technical precision, while we focus on the validation and credibility of climate-related claims. Such an approach supports transparency and helps to reduce conflicts of interest.

In alignment with our support for the Anti-Greenwash Charter, we engage only with partners who demonstrate a genuine commitment to responsible carbon reporting and sustainability communications. We share insights, tools, and best practices to help our partners enhance the quality of their disclosures and avoid misleading or exaggerated claims.

Any sustainability-related statements or disclosures (including but not limited to annual ESG reports, sustainability reports, and social media posts such as LinkedIn) that are issued without prior consultation or review by Carbonology® remain solely the responsibility of the issuing party. Carbonology® accepts no liability for the accuracy, completeness, or interpretation of such independently published content.

Transparency is central to the way we operate. We communicate clearly about the credentials, capabilities and methodologies of our partners, ensuring that all

stakeholders are informed. This reflects our wider commitment to responsible practice and encourages a culture of honesty and integrity across the sustainability landscape.

Reviews of Content.

Regulatory Awareness and Preparedness

In line with the expectations set out in The Anti-Greenwash Charter, we maintain a proactive and structured approach to monitoring developments in sustainability regulation, carbon reporting standards, and guidance on environmental claims.

Before publishing any public-facing content, advice, or commentary, we conduct an internal review of the relevant regulatory and policy landscape to ensure our position is accurate, compliant, and up to date. This includes tracking changes in UK, EU and international frameworks, as well as voluntary standards that influence best practice in climate disclosure and responsible marketing.

To support this, we conduct a formal quarterly review of regulatory updates and industry developments, which feeds into the ongoing refinement of our internal communications protocols and client guidance. Where relevant, we also update our training, templates, and verification practices to reflect new requirements or expectations.

By embedding this awareness into our processes, we ensure that all of our communications reflect current regulations and uphold our commitment to responsible, accurate and transparent sustainability claims.

Legal Compliance.

Our commitment to legal compliance is unwavering, particularly in the area of green claims. We have developed a comprehensive legal compliance framework that includes regular internal audits, ongoing staff training, and collaboration with external legal experts.

All marketing and communications content is rigorously reviewed to ensure compliance with relevant UK, EU and international legislation, including regulations related to environmental claims, advertising standards, and data protection.

We closely monitor regulatory developments and regularly update our internal processes to reflect the latest legal requirements and guidance.

As part of this proactive approach, we hosted a joint webinar with leading law firms to explore the evolving regulatory landscape surrounding green claims in the UK and EU. This initiative helped deepen our internal understanding, supported cross-sector learning, and reinforced our commitment to legally robust and transparent communication.

Governance of this Policy.

Responsibility for overseeing compliance with our Green Claims Policy rests with our CEO and Founder/ or principal Carbonologist® who conducts a formal quarterly review to ensure that all practices remain aligned with the policy. Any instances of non-compliance are reported to the Leadership Team, who assess the matter and determine appropriate actions.

Each business area leader is responsible for implementing practices, procedures and operational models that adhere to the Green Claims Policy. The Marketing Team maintains and regularly updates the internal policy guidelines to ensure they remain current and relevant.

Before entering into new partnerships with third parties, including suppliers, we share our Green Claims Policy to encourage alignment and the adoption of similar standards for responsible environmental communications.

Campaign Reviews.

Role as a Signatory of The Anti-Greenwash Charter

As a committed signatory of The Anti-Greenwash Charter, Carbonology® upholds the principles of transparency, accuracy, and integrity in all aspects of our work as a GHG verification body. While we do not make environmental or marketing claims ourselves, we play a critical role in evaluating the credibility of such claims made by others.

Our verification processes are designed to align with the Charter's standards, ensuring that the organisations we work with can communicate their climate impact in a responsible and evidence-based way. We maintain rigorous internal procedures and quality assurance protocols to safeguard the integrity of our assessments.

We recognise the responsibility that comes with our role and welcome scrutiny of our own practices. To support ongoing transparency, we maintain detailed documentation of our methodologies and decisions, which can be reviewed in accordance with client and regulatory requirements.

As a signatory, we are committed to continual improvement and remain fully aware that failure to uphold the Charter's principles may affect our certified status.

Claim Verification.

Clarifying Our Role

As an ISO 14064 verification body, our primary responsibility is to independently assess and verify greenhouse gas emissions data and related methodologies. While we do not directly verify marketing or sustainability claims, our work provides a critical foundation for organisations seeking to make credible and substantiated carbon-related statements.

Supporting Transparent Claims

Verified emissions data is a key component of any legitimate green claim. By ensuring that reported figures are accurate, consistent, and aligned with international standards, we help organisations build trust and transparency in their climate communications. However, we acknowledge that the interpretation and presentation of these figures (especially in public-facing claims) requires additional scrutiny beyond our scope and lies in the responsibility of the client.

Recommendations for Independent Claim Verification

To strengthen the credibility of green claims, we encourage organisations to seek independent verification of the messaging and context surrounding their carbon disclosures. This may include:

Complementary to Our Verification

Our emissions verification process under ISO 14064 can serve as a reliable data source for these external assessments. Organisations are encouraged to reference our verification outcomes when substantiating claims, while also ensuring that the broader messaging is independently reviewed to avoid misrepresentation or greenwashing.