

Green Gold Label Partner Code of Conduct

Principles of the Green Gold Label Foundation
for cooperation with partners, sub-contractors, service-providers,
consultants and other third parties



GGL Partner Code of Conduct

Version 1-0

Valid from 2 March 2026 (Adoption date)

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Document navigation

This document is part of the GGL Setup and Governance section from the Overall documents. It concerns the **GGL Partner Code of Conduct** and applies to all GGL Modules.

The Overall documents comprise the GGL Setup and Governance, GGL Standards and GGL Operating documents. Additionally, the GGL scheme offers Instructions and Guidances for specific regulatory frameworks (RED, FIT/FIP, SDE+/++), which can supersede clauses in the Overall documents. This applies only when explicitly stated in the relevant Instructions and Guidances.

Refer to the **GGL Document Structure** (as part of the GGL Setup and Governance documents) for more detailed information on navigating and interpreting GGL documentation.

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Changes and transitioning

This is the first version of this instruction.

In transitioning to this current version of this document, the following applies to GGL Partners:

Publication date	7 November 2025
Adoption date	2 March 2026
Effective date	N/A – this is the first version of this document
End of Transition period	N/A – this is the first version of this document

Glossary

Term	Definition
Adoption date	New (versions of) GGL documents include an Adoption date in the transitioning section. This date indicates when certification against the GGL Scheme and the specific document becomes possible. Certifications based on previous versions will remain valid until the Effective date of the new document.
Biomass	Biomass refers to the biodegradable portion of products, waste, and residues derived from biological sources in agriculture, which includes both plant and animal materials. It also encompasses materials from forestry and related industries, such as fisheries and aquaculture. Additionally, biomass includes the biodegradable fraction of waste, including industrial and municipal waste of biological origin.
Certification Body / CB	An independent third party evaluates and certifies the certification process. Certification bodies approved by GGL for one or more GGL scopes are listed on the GGL website.
Conflict of interest	A conflict of interest occurs when a person's personal, professional, or financial interests could influence their judgment, decisions, or actions. This influence may compromise their objectivity, fairness, or integrity in relation to their responsibilities towards the Foundation.
Effective date	New (versions of) GGL documents specify an Effective Date. This is the date after which certification can only be granted according to the GGL Scheme and the specific document that has the Effective Date. Certification based on previous versions of the document is no longer considered valid.
Foundation / GGL Foundation	The Green Gold Label Foundation owns the Green Gold Label (GGL) scheme, including all technical documents, promotional materials, logos, websites, and other intellectual properties related to GGL.
GGL Module	These Instructions and Guidance documents outline how GGL has been approved and recognized as a Certification scheme under various legal and voluntary frameworks (e.g., Renewable Energy Directive (RED) in Europe and FIT/FIP in Japan).
Operating partner	The GGL Foundation has signed the GGL Operating agreement with a third-party service provider and GGL Partner. Under this agreement, the service provider handles all management and operational activities related to the GGL Foundation's certification scheme on its behalf.
Participant / GGL Participant	An economic operator that has been certified under the GGL Regulation Section G, or under another certification scheme endorsed and approved by the relevant authorities (e.g., EU for RED or METI for FIT/FIP), holds equivalent status. This includes forest and agricultural biomass producers, waste and residue producers, first gathering points, collectors, suppliers, traders, processing plants, and conversion plants (end-users).



Term	Definition
Partner / GGL Partner	GGL collaborates with vendors, service providers, and consultants to conduct its business efficiently, either directly or through its representatives and subcontractors. All third parties that provide services or products to GGL are collectively referred to as "partners" and must adhere to the GGL Partner Code of Conduct . To clarify, GGL's partners are distinct from biomass suppliers, GGL participants, and certification bodies, which are governed by the principles and criteria of the GGL Scheme.
Publication date	New (versions of) GGL documents include their Publication date, which indicates when that version is published. Certification against a new version cannot occur until after its Adoption date.
Transition period	The new versions of the GGL documents specify the end of a Transition Period. This is the time until which (re-)certification decisions made before the Effective Date (based on the previous version of the document) remain valid. During the Transition Period, audits conducted by a Certification Body must be based solely on the valid (new) version of the GGL Scheme documents.
Whistleblower	A person who reports or discloses information about potential wrongdoing obtained in a work-related context helps prevent damage and detect threats to the principles and criteria of the GGL scheme that may otherwise remain hidden.



A. Introduction

The GGL Foundation is a non-profit organisation regulated under Dutch law. The GGL Foundation is responsible for and the owner of an independent certification scheme.

The GGL Foundation is committed to promoting sustainability, transparency, and integrity. The GGL Foundation expects partners, sub-contractors, service-providers, consultants and other third parties collectively referred to as "partners") that the GGL Foundation or its representatives engage with to uphold the same values. This **GGL Partner Code of Conduct** sets out the basic requirements the foundation expects of any partner.

B. Applicability

B.1

The GGL Foundation cooperates with and relies on many different stakeholders. Because objectivity, integrity and transparency are crucial to the functioning of its GGL certification scheme and the activities conducted under it, the GGL Foundation aims to ensure proper governance by its most important stakeholders.

B.2

For the following types of stakeholders, this is regulated in the GGL scheme a manner that the Foundation considers adequate, so these **do not require** regulation under this **GGL Partner Code of Conduct**.

B.2.1 Certification Bodies

All Certification Bodies with GGL are accredited under ISO-17065, which includes detailed requirements audited by National Accreditation Bodies to ensure Certification Bodies operate competently, consistently, confidentially, and impartially. In addition, each GGL Certification Body has entered into a **CB Agreement** with the GGL Foundation that ensures its compliance with the **GGL Regulation**, including organisational and auditor requirements.

B.2.2 GGL Participants and their suppliers

All GGL Participants are certified for compliance with the GGL Standards and Modules, which include more stringent requirements than those in this **GGL Partner Code of Conduct** regarding the health, safety, and labour rights of their employees. Suppliers and/or producers of biogenic residues and wastes to GGL Participants that are not certified are subjected to GGL's supplier verification program by GGL Participants with similar requirements, which Certification Bodies audit.

B.2.3 Advisory Council

The roles and responsibilities of the GGL Advisory Council are defined in the GGL Regulation, along with requirements for decision-making, confidentiality and objectivity that apply to its members.



B.3

This **GGL Partner Code of Conduct** targets other stakeholders that are not directly regulated under the GGL scheme, referred to as GGL Partners in this document. This document identified 3 groups of GGL Partners.

B.3.1 GGL Operating partner

This **GGL Partner Code of Conduct** and the principles it contains apply to the third-party with which the GGL Foundation has an agreement (hereafter “**Operating partner**”), under which the latter performs all management and operational activities of the former’s certification scheme. Under that agreement, this Operating partner is obliged to draft this **GGL Partner Code of Conduct** for approval by the GGL Foundation and become a signatory to it. The Operating partner also endeavours to subject all of its Partners (who indirectly are Partners of the GGL Foundation too) for which this is applicable per the criteria in B.3.2 below, to this **GGL Partner Code of Conduct**.

B.3.2 Major GGL Partners

The GGL Foundation considers its business with Major GGL Partners important, critical or otherwise significant when it meets one or more of the following criteria:

- The business with that Partner is contracted for a period longer than 1 (one) year;
- The business with that Partner has a total value equal to or more than € 50,000 per year (in one or more contracts);
- The Partner has another relation with the GGL Foundation (e.g., being a (prospective) Certification Body, member of the Advisory Council), and its business with the GGL Foundation is thus more prone to potential conflicts of interest; or
- The GGL Foundation has requested that the Partner signs this **GGL Partner Code of Conduct**.

For Major GGL Partners, the GGL Foundation requires that their compliance with the **GGL Partner Code of Conduct** is confirmed before rendering services and periodically during the remainder of their business with the GGL Foundation or the Operating Partner.

B.3.3 Other GGL Partners

For GGL Partners that do not qualify as Major GGL Partners per B.3.2 the establishment of compliance with this **GGL Partner Code of Conduct** is not required before their business with the GGL Foundation or the Operating Partner. However, this **GGL Partner Code of Conduct** will be distributed to all GGL Partners, the requirements of this document will be an explicit discussion topic, and compliance with this document will be considered positively in their selection process.



C. Compliance with Laws and Regulations

- C.1** GGL Partners must comply with all applicable laws, regulations, and standards relevant to their business and to the countries in which they operate, including those related to labour, human rights, environmental protection, anti-bribery, anti-corruption, and anti-competitive behaviour.
- C.2** In case applicable regulations set different rules or requirements, the GGL Foundation expects that GGL Partners comply with the highest, strictest, or most stringent rules or requirements amongst them.

D. Fair Business Practices

The GGL Foundation requires that all GGL Partners conduct their business fairly, based on principles that apply not only to the specific services rendered but also to the wider business they operate in. These principles include the following:

- D.1** Arm's length transactions: All contracts and transactions with the GGL Foundation or its representatives must be made independently and at arm's length, without conflicts of interest, hidden relationships, or undue influence. Partners shall strictly abstain from anti-competitive behaviour, such as disclosure of market prices or certification status of biomass across GGL Participants or others.
- D.2** Market-conform pricing: Partners must offer services and goods at fair, market-conforming rates. Prices should reflect open competition and normal market conditions. When possible, Partners shall accept and facilitate GGL Foundation obtaining comparable market rates for services and, at a minimum, request justification of the prices offered.
- D.3** Written policies and procedures: Partners shall document their policies and procedures to abstain from bribery, corruption, and anti-competitive behaviour. This documentation shall be made available to GGL Foundation upon request.
- D.4** Transparency: Partners must provide accurate information about their services, pricing, and subcontracting arrangements upon request.

E. Sustainability and Environmental Responsibility

The GGL Foundation requires that all GGL Partners conduct their business aiming to adhere to the same standards, principles and requirements of the GGL Scheme, which include the following:

- E.1** Partners must operate in a way that minimises environmental harm. The GGL Foundation expects Partners to undertake efforts to reduce waste, energy consumption, and GHG emissions, and to promote sustainable practices throughout operations further. Partners shall periodically monitor progress toward their environmental goals.
- E.2** Partners working with GGL Foundation in sustainability-related fields shall have documented environmental policies, independent certification or other objective mechanisms in place. These Partners must actively support the environmental and social goals of GGL Foundation's certification scheme, but only to the extent



these can be applied to the services they provide and are reasonably expected within the context of the markets they operate in.

F. Ethical Conduct and Integrity

The GGL Foundation requires that all GGL Partners in their business uphold the highest standards of ethical conduct and integrity. These include the following.

- F.1** No Corruption or Bribery: Partners must not engage in corruption, bribery, fraud, or any other unethical behaviour. When the GGL Foundation learns that a Partner may have breached this conduct requirement, it will immediately evaluate whether cooperation can continue.
- F.2** Confidentiality: Partners must protect any non-public information shared by the GGL Foundation and use it only for agreed purposes or to the extent required by law.
- F.3** Respect for People: Partners are committed to supporting and promoting the principles and rights at work, as set out in the “Fundamental Principles and Rights at Work (1998) and its Follow-up (2022)”, issued by the International Labour Organisation (ILO). They shall comply with applicable national labour laws in their countries of operation. In addition, GGL Partners shall document in their Management system the criteria and measures implemented to:
- Comply fully with ILO standards regarding minimum working age and the prohibition of child labour, and
 - Further support rights at work:
 - Respecting employees’ freedom of association and the right to collective bargaining;
 - Avoiding the use of forced or compulsory labour; and
 - Promoting equal opportunity and seeking to prevent discrimination in employment and occupation.
- F.4** Conflicts of Interest: Partners must avoid situations that create or appear to create a conflict between their personal interests, business interests and their work for the GGL Foundation. If a conflict of interest arises or is suspected, Partners must immediately inform the Foundation.

G. Monitoring and Cooperation

The GGL Foundation operates with GGL Partners based on trust and good faith, unless proven otherwise and expects its network of GGL Partners to do the same.

G.1

All prospective Major GGL Partners, as defined in B.3.2 shall sign this **GGL Partner Code of Conduct** before rendering any service. All Partners that have signed this **GGL Partner Code of Conduct** and for which the business with the GGL Foundation or the GGL Operating Partner continues, shall perform a self-evaluation at least annually.



G.2

All signatories to this **GGL Partner Code of Conduct** shall 1) be fully responsible for their subcontractors and/or suppliers for the services rendered to the GGL Foundation, 2) ensure that these subcontractors and/or suppliers become a signatory too when these meet the criteria of paragraph B.3.2 above and 3) share the relevant documentation with the GGL Foundation (“flow-down requirement”) and the Operating Partner.

G.3

GGL Partners are expected to cooperate with reasonable information requests from the GGL Foundation and the GGL Operating Partner to evaluate that Partner’s compliance with this **GGL Partner Code of Conduct**. The GGL Foundation can further evaluate conformity in the following ways:

- Directly through one or more interviews by the GGL Foundation, and
- In case there are reasons to doubt compliance, the GGL Foundation will inform the Partner through an independent third-party auditor.

G.4

GGL Partners are also recommended to have a whistleblowing policy or equivalent mechanism in place, allowing their employees and stakeholders to report concerns about misconduct, breaches of law, or violations of this **GGL Partner Code of Conduct** confidentially and without fear of retaliation. Partners without such a policy in place can direct their employees and stakeholders to the Chairman of the Board of the GGL Foundation to confidentially file their reports. The GGL Foundation will treat such a report in line with section I of the GGL Regulation.

G.5

When a GGL Partner becomes aware of a breach of this **GGL Partner Code of Conduct** – by themselves or others – they must inform the GGL Foundation and the GGL Operating Partner promptly.

H. Consequences of Non-Compliance

Non-conformities with this **GGL Partner Code of Conduct** are qualified by the GGL Foundation as major or not major, which will be discussed with that GGL Partner on a case-by-case basis.

H.1

When major non-conformities with this **GGL Partner Code of Conduct** are identified for a GGL Partner, the GGL Foundation and the GGL Operating Partner may terminate the business with that Partner with immediate effect.

H.2

In cases of other non-conformities, the GGL Foundation expects that the GGL Partner will remedy that non-conformity within a reasonable period to be agreed with the GGL



Foundation. Such non-conformities that have not been remedied within that term automatically qualify as major non-conformities.



Annex I. Self-Evaluation Form

A. Introduction

The GGL Foundation is committed to promoting sustainability, transparency, and integrity. The GGL Foundation expects the partners, subcontractors, service-providers, consultants and other third parties (collectively referred to as "partners") that the GGL Foundation or its representatives engage with to uphold the same values.

This self-assessment form verifies compliance with the **GGL Partner Code of Conduct**, which sets out the basic requirements the foundation expects of any partner. GGL's current or prospective Partners meeting the criteria of the **GGL Partner Code of Conduct** shall complete this self-assessment before rendering services and periodically as set out in the Code.

B. Self-assessment questions

Tick the applicable box for each of the 20 questions grouped into 6 topics below. Sign the self-assessment form in Section D to declare its truthfulness trustfulness and send a softcopy of the completed and signed form by email to info@greengoldlabel.com. Any remarks you wish to add can be included in Section C below.

B.1 Compliance with Laws and Regulations

B.1.1 My company complies with all applicable laws, regulations, and standards relevant to our business operations, including those related to labour, human rights, environmental protection, anti-bribery, and anti-corruption.

Fully Largely Partially Limited Not I don't know

B.1.2 My company respects internationally accepted principles such as the ILO Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights.

Fully Largely Partially Limited Not I don't know

B.1.3 My company ensures that freedom of association, elimination of forced labour, child labour, and discrimination are respected within our organisation.

Fully Largely Partially Limited Not I don't know

B.2 Fair Business Practices

B.2.1 My company conducts all business with the GGL Foundation and others in a fair, transparent, and arm's length manner, free from conflicts of interest or undue influence.

Fully Largely Partially Limited Not I don't know



B.2.2 My company offers services and goods at fair, market-conform rates and justifies pricing when requested.

Fully Largely Partially Limited Not I don't know

B.2.3 My company has written policies and procedures in place to prevent bribery, corruption, and anti-competitive behaviour, and can make these available to GGL upon request.

Fully Largely Partially Limited Not I don't know

B.2.4 My company provides accurate and transparent information about our services, pricing, and subcontracting arrangements when requested.

Fully Largely Partially Limited Not I don't know

B.3 Sustainability and Environmental Responsibility

B.3.1 My company operates in a way that minimises environmental harm, reduces waste and emissions, and promotes sustainability across operations.

Fully Largely Partially Limited Not I don't know

B.3.2 My company periodically monitors progress towards environmental and sustainability goals.

Fully Largely Partially Limited Not I don't know

B.3.3 My company has documented environmental policies or certifications in place (where applicable) that support GGL's sustainability objectives.

Fully Largely Partially Limited Not I don't know

B.4 Ethical Conduct and Integrity

B.4.1 My company upholds the highest standards of ethical conduct and integrity in all business dealings.

Fully Largely Partially Limited Not I don't know

B.4.2 My company does not engage in any form of corruption, bribery, or fraud.

Fully Largely Partially Limited Not I don't know

B.4.3 My company protects all confidential or non-public information shared by the GGL Foundation and uses it only for agreed-upon purposes.

Fully Largely Partially Limited Not I don't know



B.4.4 My company treats all employees and stakeholders fairly, respectfully, and without discrimination, upholding international labour standards.

Fully Largely Partially Limited Not I don't know

B.4.5 My company avoids situations that could create a real or perceived conflict of interest and immediately discloses any potential conflicts to the GGL Foundation.

Fully Largely Partially Limited Not I don't know

B.5 Monitoring and Cooperation

B.5.1 My company is fully responsible for subcontractors and suppliers involved in GGL-related services and ensures they comply with this Code when applicable.

Fully Largely Partially Limited Not I don't know

B.5.2 My company cooperates with reasonable information requests from the GGL Foundation or Operating Partner to verify compliance with this Code.

Fully Largely Partially Limited Not I don't know

B.5.3 My company has (or uses) a whistleblowing mechanism that allows confidential reporting of misconduct without retaliation.

Fully Largely Partially Limited Not I don't know

B.5.4 My company promptly informs the GGL Foundation and Operating Partner of any breaches of this Code of Conduct by us or others.

Fully Largely Partially Limited Not I don't know

B.6 Consequences of Non-Compliance

B.6.1 My company understands that non-compliance with this Code may result in corrective actions or termination of cooperation with the GGL Foundation.

Fully Largely Partially Limited Not I don't know



C. Remarks and comments

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D. Signature

I declare that all information and facts contained in this self-assessment are true, and that I have the authority to represent the company as GGL Partner below duly.

Company	Name, Title	Place, Country	Date
Signature			