

**SEPA**Sustainability and
ESG Professionals
Association

Code of Conduct & Engagement

Sustainability & ESG Professionals Association (SEPA)

Issued by the Founding General Assembly

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We are building a global professional home grounded in mutual respect, evidence-based practice, and the shared responsibility to advance sustainability credibly, independently, and with integrity.

This Code of Conduct and Engagement ("the Code") sets out the minimum standards of behaviour expected of everyone who engages with, and within, the Sustainability & ESG Professionals Association (SEPA). It applies at all levels and in all capacities, from Chairperson and Board members to Secretariat staff, working group leads, regular members, and to partners, affiliates, sponsors, and external collaborators.

The Code is set and maintained by the Board of Global SEPA, under the oversight of the Ethics Committee, in accordance with the Articles of Association. The Ethics Committee Chair leads its implementation and reports to the Board.

By joining, participating in, or engaging with SEPA in any capacity, you accept this Code as a condition of that engagement. The standards in this Code apply in all SEPA settings, formal and informal, in person and digital.

A. Who This Code Applies To

This Code applies to all individuals who engage with SEPA in any capacity, including:

A. Members

- Regular members, practitioners who have joined SEPA
- Board members; including Founder Directors, Regional Board members, the Ethics Committee Chair, and independently elected members
- Board Deputies; who hold participatory rights at Board meetings
- Secretariat staff; whether employed, contracted, or volunteering
- Working group leads and participants
- Chapter and regional hub leaders and members

B. External engagers

- Partners and affiliates: organisations or individuals in a formal relationship with SEPA
- Sponsors: organisations or individuals providing financial or in-kind support
- Advisory committee members
- Guests, speakers, and event participants
- Any individual representing SEPA externally or using SEPA's name, brand, or platforms

Where specific sections impose additional or differentiated obligations on particular groups (e.g., Board members, Secretariat staff), this is indicated by an applicability note at the start of that section.

1. Professional Conduct and Integrity

We expect all internal and external stakeholders to:

- Act with honesty, care, and integrity in all interactions within and on behalf of SEPA.
- Base contributions on evidence, transparent reasoning, and genuine experience, and to not misrepresent expertise, credentials, or the basis of views.
- Respect differences in sector, geography, seniority, and perspective. We engage with curiosity and respect, even where we disagree.

- Do not engage in conduct that is dishonest, misleading, abusive, discriminatory, or that would bring SEPA into disrepute.

2. Confidentiality, Antitrust, and Responsible Information Sharing

We never share business-sensitive or competitively sensitive information in SEPA settings, including meetings, working groups, online forums, digital platforms, or informal sessions, regardless of whether those settings are formal or social in nature.

We are mindful of competition and antitrust law, and refrain from any discussion or coordination that could constitute or be perceived as collusion on prices, markets, bids, customer allocation, or other commercially sensitive matters.

When we share cases, examples, or data, we anonymise or generalise them as needed, so that no confidential information is disclosed or can be attributed to any specific organisation.

A breach of these obligations may lead to immediate suspension or termination of the relevant person's engagement with SEPA and, where appropriate, referral to relevant authorities. All such breaches are assessed independently by the Ethics Committee.

3. Participating in Personal Capacity

When we participate in SEPA activities as members, we do so in our personal professional capacity, not as formal representatives of our employer, unless this has been explicitly agreed and communicated in advance.

We make clear that our views are our own, shaped by our experience, and not official positions of our employer or any other representational capacity we hold.

We respect that others also participate as individuals and we do not attribute their views to their employers or other affiliations.

Note for Board members and working group leads

Where you are explicitly authorised to speak or act on behalf of SEPA, for example as a Board officer, a working group representative, or in an external engagement, you must make this authorisation clear and act consistently with SEPA's agreed positions and the Articles of Association.

4. Non-Commercial Community Space

SEPA is a professional community, not a marketing or sales platform. This applies to all participants, including sponsors and partners who have a recognised relationship with SEPA.

We do not use SEPA meetings, working groups, channels, events, or platforms to promote or sell our own services, products, or those of our employer or organisation.

If we share tools, methods, or examples from our work, we do so in a spirit of learning and mutual support, not as commercial solicitation, and in compliance with section 2 of this Code.

Any business collaboration or commercial engagement that may arise informally between members is kept clearly separate from SEPA forums and takes place outside SEPA spaces.

Additional obligations for sponsors and partners

Sponsors and partners may be recognised by SEPA and may have defined visibility or engagement rights. These rights are governed by the relevant agreement with SEPA and do not extend to using SEPA's community spaces for direct promotion or solicitation. Breach of this principle constitutes a material breach of the partner or sponsor relationship.

5. Safe, Respectful, and Inclusive Environment

We contribute to a respectful and inclusive environment where all participants can share challenges, dilemmas, and learning without fear of ridicule, judgment, or misuse.

We listen actively, make space for diverse voices, and avoid any form of harassment, bullying, discrimination, or personal attack, whether in person, digitally, or in writing.

We do not engage in behaviour that marginalises individuals based on gender, ethnicity, nationality, religion, disability, age, sexual orientation, or any other characteristic.

If we witness behaviour that undermines these principles, we raise it constructively, with the relevant SEPA contact point, a Board member, or in confidence via ethics@global-sepa.org.

Additional obligations for leaders and staff

Board members, Secretariat staff, working group leads, and chapter/hub leaders have an active responsibility to model inclusive behaviour, address conduct issues when they arise, and not allow a culture of exclusion or intimidation to develop in spaces they lead.

6. Conflicts of Interest

A conflict of interest arises when a personal, financial, professional, or other interest could, or could reasonably be perceived to, influence our conduct or decisions in a SEPA context.

We proactively identify and declare conflicts of interest, whether actual or perceived, before participating in any relevant discussion, decision, or activity.

Where we have declared a conflict, we recuse ourselves from the relevant decision and do not seek to influence the outcome informally.

Additional obligations for Board members and Secretariat staff

Board members and Secretariat staff must maintain a written record of material interests and declare them at the start of each meeting at which they are relevant. This is a standing obligation, not a discretionary one.

No Board member may participate in, vote on, or otherwise influence any decision relating to their own compensation, employment terms, or performance evaluation, whether in relation to their Board role or their Secretariat employment (see also §15 of the Articles of Association).

Declarations of conflicts of interest are recorded in Board minutes and are available for Ethics Committee review.

Additional obligations for partners and external engagers

Partners, affiliates, sponsors, and advisory committee members must declare any commercial, financial, or other material interest that is relevant to their engagement with SEPA, and must not seek to use their relationship with SEPA to advance undisclosed interests.

7. External Engagement, Advocacy, and Representation

When we engage externally in a SEPA-connected capacity, including meetings with public officials, regulators, business associations, media, academic institutions, or at public events, we do so in a lawful, transparent, and respectful manner that safeguards SEPA's credibility and independence.

We comply with all applicable anti-corruption and ethics rules. We do not offer or receive, promise, or provide anything of value, including gifts, hospitality, travel, or favours, to influence decisions, and we avoid any conduct that could be perceived as undue influence.

When participating in external engagements connected to SEPA, we:

- act in line with SEPA's mission and the purpose agreed for the engagement;
- communicate factually and evidence-based, avoiding misrepresentation or selective use of information;
- declare relevant conflicts of interest, including financial interests or roles that could reasonably be perceived to influence our views;
- make clear whether we speak in our personal capacity, on behalf of a working group, or on behalf of SEPA, the last only when explicitly authorised;
- respect confidentiality obligations under section 2 of this Code;
- do not disclose the identity or positions of members without their consent;
- support appropriate documentation of the engagement (attendance, key messages, written submissions) in line with transparency expectations.

We do not use SEPA's name, logo, or platforms to support partisan political campaigning or to promote the interests of a specific company, employer, or commercial service.

When engaging with business associations or industry groups, I remain attentive to competition and antitrust risks and ensure that any collaboration or joint messaging is consistent with section 2 of this Code.

Additional obligations for Board members, officers, and authorised representatives

Only individuals explicitly authorised by the Board may make public statements, sign submissions, or commit positions on behalf of Global SEPA. Board officers must ensure that all external representations are consistent with Board-approved positions.

8. Additional Obligations for Leaders, Board Members, and Secretariat Staff

Those who hold leadership, governance, or staff roles in SEPA carry heightened responsibilities commensurate with their authority and the trust placed in them.

8.1 Fiduciary duty

Board members act in the best interests of Global SEPA as a whole, not in the interests of the constituency or group that nominated or appointed them, nor in their own personal interests. Regional Board members, while nominated by their hub, represent Global SEPA when sitting on the Board.

8.2 Stewardship of mission and independence

Leaders actively protect SEPA's independence, non-partisan character, and non-commercial integrity. They do not allow SEPA's platforms, brand, or positions to be captured by any employer, funder, government, or commercial interest.

8.3 Accountability and transparency

Board members and officers act transparently toward fellow Board members, the General Assembly, and (where appropriate) the membership. Material decisions, conflicts of interest, and significant external engagements are documented and reported.

8.4 Secretariat staff obligations

Secretariat staff carry out their duties in accordance with this Code and their employment or engagement terms. They operate under Board authority and do not act outside the scope of their delegated responsibilities. They may raise concerns about Board conduct or governance matters confidentially with the Ethics Committee.

8.5 Founder Directors

Co-founders are subject to all obligations in this Code, including, and especially, the conflict-of-interest and self-dealing prohibitions. Their protected Board tenure does not exempt them from scrutiny; it increases the responsibility to model the values this Code embodies.

9. Obligations of Partners, Affiliates, and Sponsors

Organisations and individuals in a formal partner, affiliate, or sponsor relationship with SEPA accept this Code as a condition of that relationship, alongside the terms of their specific agreement with SEPA.

Partners, affiliates, and sponsors shall:

- uphold SEPA's non-commercial, non-partisan, and independence principles in all joint activities;
- not use their relationship with SEPA to imply endorsement of their products, services, or positions beyond what is explicitly agreed;
- not seek to influence SEPA's policy positions, advocacy outputs, or community content in exchange for or as a condition of their financial or in-kind support;
- respect member confidentiality and not use access to SEPA spaces, events, or member data for commercial prospecting;
- comply with all applicable laws, including anti-corruption, antitrust, and data protection law, in their engagement with SEPA;
- declare any material conflict of interest to SEPA prior to or at the commencement of the relationship.

Breaches by a partner, affiliate, or sponsor may result in suspension or termination of the relationship, removal of recognition, and, where appropriate, referral to relevant authorities.

10. Shared Purpose

We support SEPA's purpose: to strengthen the practice, voice, and impact of sustainability and ESG professionals, and to improve the quality and credibility of sustainability outcomes in organisations and society. We are willing, within our capacity, to contribute experience, insight, and time to help the community learn, to produce credible outputs, and to inform better policy, standards, and professional practice.

We recognise that the credibility and influence of SEPA depends on the integrity of everyone who participates in it. We take that responsibility seriously.

11. Data Privacy and Personal Data

SEPA will only collect and use members' personal data for clearly defined purposes related to membership, communication, coordination of activities, and governance, in accordance with applicable data protection law, including the GDPR where it applies.

Members may at any time request access to the personal data SEPA holds about them, and request corrections if information is inaccurate or incomplete.

Members may withdraw their consent to receive certain communications (e.g. newsletters, event invitations) and will be offered simple ways to update their preferences.

If members end their membership or engagement, they may request that their personal data be deleted, subject to any legal or governance requirements to retain limited records.

Withdrawal of consent or membership will not result in any penalty, beyond the practical consequence of no longer having access to member-only services and spaces.

Obligations for staff and leaders handling member data

Board members, Secretariat staff, and anyone handling member or participant data on behalf of SEPA must do so in strict compliance with applicable data protection law and SEPA's data governance policies. Member data may not be used for any purpose outside SEPA's stated purposes, and may not be shared with third parties without appropriate legal basis.

12. Enforcement, Reporting, and Consequences

12.1 Reporting

Any person who becomes aware of behaviour that may breach this Code is encouraged to report it in confidence to ethics@global-sepa.org. Reports may be made anonymously. All reports are treated with discretion and referred to the Ethics Committee.

12.2 Process

The Ethics Committee handles all reports of conduct breaches. It operates independently of the Global Secretariat. The person against whom a report is made will be given a fair opportunity to respond before any recommendation is finalised. Proceedings are confidential.

12.3 Consequences

Depending on the nature and severity of a breach, consequences may include:

- a formal warning;
- suspension from specific SEPA activities or spaces;
- termination of membership or engagement with SEPA;
- suspension or termination of a partner, affiliate, or sponsor relationship;
- in the case of Board members or staff, referral for appropriate governance action under the Articles of Association;
- where required by law, referral to relevant authorities.

12.4 No retaliation

SEPA does not tolerate retaliation against any person who raises a concern in good faith under this Code. Retaliation is itself a breach of this Code.

By engaging with SEPA as a member, leader, partner, and/or in any other capacity, we all commit to upholding these standards. We understand that our conduct reflects on our community and on the profession we are working to strengthen.

Reported concerns and conduct matters: ethics@global-sepa.org

Issued by the SEPA Board under the oversight of the Ethics Committee. | www.global-sepa.org