

COP

of Integrity



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Address : Kocatepe Mh. Abdülhak Hamit Cd.
No: 24/5, 34437 Beyoğlu/İstanbul

Tel : +90 (212) 240 52 81

E-mail : info@seffaflik.org

Web : www.seffaflik.org

Written by : Ayşe Özge Erceiş

Design : Kurtuluş Karaşın



PREAMBLE

These Principles establish the minimum integrity standards for the planning, delivery, and legacy of COP31 under the authority, coordination, or branding of the COP31 Presidency and the Host Country. They are intended to complement applicable UNFCCC rules and to support that COP31 is delivered in a manner consistent with climate credibility, public trust, human rights, and institutional independence.

The 31st Conference of the Parties to the UNFCCC (COP31) will be held in Türkiye, a country at the intersection of major energy transition pressures, significant fossil fuel transit interests, and growing civil society in demand for transparent governance. This context makes the application of robust integrity standards not only appropriate, but imperative. COP31 arrives against a backdrop of sustained international scrutiny: COP28 in the United Arab Emirates drew widespread criticism following the appointment of a national oil company executive as Conference President, while COP29 in Azerbaijan faced serious concerns regarding civil society access, accreditation manipulation, and the conduct of sponsorship arrangements.

Türkiye's unique position as a host, having ratified the Paris Agreement in 2021, with nationally determined contributions that remain among the least ambitious in the G20, places additional responsibility on the Presidency and Host Country to demonstrate through process what they have yet to demonstrate through policy. Integrity in the delivery of COP31 is therefore both necessary and an opportunity to rebuild trust in the Conference of the Parties as a credible site of multilateral climate action.

Transparency International Türkiye has developed these Principles as part of its Clean COP31 initiative. They are offered as a reference framework for adoption, adaptation, or endorsement by the COP31 Presidency, Host Country institutions, civil society coalitions, and other relevant stakeholders.

1 PURPOSE AND SCOPE

These Principles apply across all Presidency- and Host Country-managed COP31 activities, including the Green Zone, public programmes, hospitality and cultural events, digital platforms, communications, procurement, logistics, sponsorships, partnerships, and other COP31-branded functions, as well as the organising entities, implementing partners, sponsors, exhibitors, contractors, subcontractors, consultants, volunteers, and service providers involved in these activities.

These Principles are without prejudice to the UNFCCC Rules of Procedure, COP observer status and accreditation decisions, or applicable national law. Where national legal standards do not meet the thresholds set out herein, these Principles will serve as the applicable standard for Host Country-managed COP31 functions.

These Principles apply based on the nature of an entity's involvement in COP31, rather than its formal designation. Any entity that plays a substantive role in shaping COP31 programming, communications, or resource allocation falls within their scope, regardless of whether it holds a formal partner or sponsor classification.

2 PUBLIC INTEREST, CLIMATE ALIGNMENT AND INDEPENDENCE

All COP31-related decisions are expected to be guided by the public interest and the objectives of the UNFCCC and the Paris Agreement. In this context, partnerships, sponsorships, procurement arrangements, activations, and communications may be carefully considered to ensure that they do not risk undermining the credibility, independence, impartiality, or climate purpose of the Conference.

The public interest test may be applied on an ongoing basis throughout the COP31 cycle. Arrangements that were initially considered consistent with these Principles could be revisited considering subsequent developments, including changes in conduct, litigation, regulatory actions, or shifts in an entity's public position on climate policy. In such cases, the Presidency may consider reviewing and, where appropriate, adjusting or discontinuing an arrangement on public interest grounds.

Climate alignment is envisaged as a holistic assessment that takes into account an entity's lobbying activities, litigation positions, public communications, and capital allocation, alongside voluntary commitments or net-zero pledges. A published sustainability strategy, on its own, may not be regarded as sufficient evidence of climate alignment under these Principles.

In this context, the COP31 Presidency may wish to consider issuing an early public commitment to uphold integrity and transparency across the planning, delivery, and legacy of COP31, and to adopt these Principles, or comparable standards, as a guiding framework for that commitment.

3 TRANSPARENCY AND PUBLIC DISCLOSURE

COP31 is expected to maintain a timely and accessible public disclosure system covering, at a minimum:

- the identity of sponsors, partners, exhibitors, and major contractors;
- the value and form of financial and in-kind contributions;
- relevant beneficial ownership or controlling interests, where applicable;
- material sectoral interests and affiliations relevant to climate policy; and
- official meetings between senior COP31 officials and external entities concerning sponsorship, procurement, programming, or policy-sensitive engagement.

Disclosures are expected to be searchable, regularly updated, and made available in accessible formats.

The disclosure register may be made public no later than six months before the start of COP31, updated on a rolling basis as new arrangements are entered, and remain accessible for a reasonable period following the close of the Conference, for instance, up to five years. Disclosures are encouraged to be published in both English and Turkish and, where feasible, in machine-readable format.

Where a lobbying register is established, it is encouraged to include, at minimum, the names of organisations, the topics discussed, a summary of outcomes, and the dates of engagement.

The summaries of lobbying contacts, understood as direct communications by external entities seeking to influence COP31-related positions, programming, or decisions can be published within a reasonable timeframe. This could include contacts involving senior officials such as the COP31 President, the CEO or Secretary-General of the Host Country organising entity, and Directors responsible for sponsorship, procurement, and programming.

4 CONFLICT OF INTEREST AND DUE DILIGENCE

Senior officials, advisers, and decision-makers involved in COP31 planning and delivery are encouraged to submit conflict-of-interest disclosures. Real, potential, and perceived conflicts of interest can be assessed and managed through appropriate measures, including recusal, mitigation, or, where necessary, exclusion from specific decision-making processes.

Prospective sponsors, partners, exhibitors, and major contractors may be subject to integrity due diligence, considering factors such as human rights, labour standards, environmental performance, anti-corruption controls, litigation and regulatory history, climate-related lobbying conduct, and risks related to misinformation or greenwashing.

Conflict-of-interest disclosures are expected to be submitted prior to appointment or engagement and updated in a timely manner in case of material changes in circumstances. These dis-

closures can be reviewed by an appropriate oversight mechanism, such as a COP31 Integrity Panel, which could provide recommendations on recusal or mitigation measures within a reasonable timeframe.

For the purposes of these Principles, a conflict of interest may be understood as a situation in which an individual has a financial, professional, personal, or organisational interest, whether direct or through a close associate, that could reasonably be perceived as influencing the exercise of their functions in relation to COP31. This assessment is objective and does not require proof of actual influence.

Due diligence processes conducted under this section are needed to be documented and retained in line with applicable standards and made available to the relevant oversight body upon request. Summaries of due diligence findings, excluding legitimately confidential information, can be reflected in a post-event transparency report.

In this context, affiliations with fossil fuel extraction, production, or high-polluting industries are considered as presenting a heightened conflict of interest risk, given their direct tension with the climate objectives of the UNFCCC and the Paris Agreement.

In composing its own national and Host Country delegation, the Presidency is encouraged to ensure that representatives of fossil fuel extraction, production, or high-polluting industries are not included. The Presidency may also wish to publicly encourage other State Parties to apply similar considerations to their own national delegations, recognising that the composition of Party delegations ultimately remains within each State's sovereign discretion.

Conflict of interest safeguards may also address post-tenure employment concerns, including restrictions on senior officials taking up roles with COP31 sponsors or partners within a defined period following the conclusion of their functions.

5 ELIGIBILITY AND INELIGIBILITY

An entity is expected not to be considered for sponsorship, partnership, exhibition, or major contracting where its conduct poses a significant risk to the integrity or credibility of COP31. Ineligibility may be considered, including but not limited to, where an entity has:

- engaged in serious corruption, fraud, trafficking, violence, or other illicit conduct;
- a record of systematic human rights, labour, or environmental harm;
- materially obstructed, misrepresented, or undermined climate action through lobbying, disinformation, misleading climate claims, or repeated greenwashing; or
- business practices that appear fundamentally misaligned with the aims of the Paris Agreement.
- entities whose core products, services, or operations include fossil fuel extraction, production, refining, or distribution, in line with the UNFCCC Secretariat's own partnership guidelines.

In applying the eligibility criteria, the Presidency may take into account a range of non-exhaustive indicators, such as: membership in trade associations that have actively opposed climate legislation or UNFCCC negotiating positions; litigation aimed at delaying or reversing climate measures; public statements by senior executives that diverge from established scientific consensus on climate change; and a pattern whereby climate-related lobbying expenditure significantly outweighs climate-related investment.

Eligibility assessments are envisaged as both prospective and ongoing. An entity considered eligible at the time of engagement may be subject to review in light of new information. In such cases, the Presidency can notify the entity, provide an opportunity to respond within a reasonable timeframe (for example, 10 working days), and subsequently determine appropriate next steps, which may include suspending or terminating the arrangement.

The Eligibility and Exclusion Matrix set out in Annex I may serve as a primary reference tool for these assessments and could be periodically reviewed and updated following each COP31 cycle.

6 RESPONSIBLE SPONSORSHIP, PARTNERSHIP AND EXHIBITION

Written agreements are needed to govern all sponsorship and partnership arrangements. These agreements may include provisions relating to integrity, audit rights, disclosure obligations, branding parameters, non-endorsement language, termination clauses, and appropriate limits on access.

Sponsorship, partnership, or in-kind contributions shall not result in any form of preferential access or influence over COP31 processes. In particular, such contributions shall not provide sponsors or partners with access to negotiators, participation in closed meetings, influence over official priorities or agendas, or preferential treatment in procurement or decision-making processes.

Sponsorship tier structures are encouraged to ensure that the scale of financial contribution does not determine access to official processes or senior decision-makers. Any access-related benefits may be limited to designated commercial spaces and public programming, and should be clearly separated from official negotiations, UNFCCC-accredited side events, and closed meetings.

Sponsorship agreements may include a climate conduct clause encouraging sponsors to inform the Presidency, within a reasonable timeframe, of any material developments in their public climate positions, lobbying activities, or regulatory status during the COP31 cycle. Where such developments raise concerns, the Presidency may consider appropriate measures in line with the terms of the agreement.

The Presidency is encouraged to publish an aggregate report of sponsorship income, categorised by sector and tier, ahead of COP31, and to update this information following the conclusion of the Conference.

Sponsorship and partnership arrangements with entities whose core business includes fossil fuel extraction or production are considered inconsistent with the climate purpose of COP31 and should not be pursued.

7 HUMAN RIGHTS, SAFETY AND DIGNITY

COP31 is needed to be delivered in a manner that upholds dignity, equality, non-discrimination, and safe participation. Harassment, intimidation, discrimination, and abuse are strongly discouraged and should be addressed through appropriate policies and procedures.

The Presidency and Host Country are encouraged to establish prevention, reporting, referral, and response mechanisms that are accessible, victim-sensitive, and, where appropriate, confidential.

The appointment of a dedicated Human Rights and Safety Officer may be considered to support the effective implementation of these commitments. Such a role could be designed with sufficient mandate, resources, and independence, and operate separately from sponsorship and procurement functions, with reporting lines to an appropriate oversight mechanism such as the COP31 Integrity Panel.

The Host Country may also consider providing public assurances, in coordination with the UN-FCCC Secretariat and relevant stakeholders, regarding the protection of participants' rights, including the rights to peaceful assembly, expression, and freedom from undue interference, throughout the COP31 period.

The Host Country Agreement governing COP31 is encouraged to be made publicly available in full at the earliest opportunity, and before its finalisation where feasible, to allow review by observer organisations. The Agreement should contain explicit guarantees for freedom of expression, prevention of surveillance or intimidation of participants, and high transparency and integrity standards.

Participants, workers, and observers are encouraged to have access to accessible, confidential reporting channels and appropriate support mechanisms when concerns arise.

8 INCLUSIVE, ACCESSIBLE AND EQUITABLE PARTICIPATION

COP31 is expected to take proactive steps to support the meaningful participation of delegates from developing countries, civil society, Indigenous Peoples, local communities, youth, workers, women, persons with disabilities, scientists, and frontline communities.

Such measures may include ensuring accessible venues and information, multilingual communication, reasonable accommodation, facilitating visa processes, ensuring safe mobility, and considering affordability in relation to accommodation and participation costs.

The Presidency is encouraged to develop and publish a Participation Equity Plan sufficiently in advance of COP31 (for example, up to 12 months prior), outlining clear and measurable commitments on accreditation access, financial support mechanisms, language accessibility, physical

accessibility, visa facilitation, and the enabling of civil society participation. Progress against this Plan may be reported publicly at regular intervals.

The Participation Equity Plan may also include targeted measures for constituencies that have historically faced barriers to participation, such as small island developing states, least developed countries, and civil society organisations operating in restricted civic space contexts. The designation of a focal point within the Host Country organising entity to support these constituencies may also be considered.

Civil society organisations accredited to COP31 are expected to be able to hold events, distribute materials, and engage with the media in designated public spaces, such as the Green Zone, subject only to limitations necessary for security, logistics, or the orderly functioning of the Conference. Where restrictions are applied, they should be transparent, proportionate, and accompanied by appropriate review or feedback mechanisms.

In this context, the Presidency may also wish to take into account emerging good practices, including those developed within the European Union and its Member States.

9 INFORMATION INTEGRITY AND TRUTHFUL COMMUNICATIONS

All COP31-branded communications, sponsor messaging, exhibitions, and public-facing activations are needed to be accurate, evidence-based, and to clearly distinguish factual information from advocacy. Misleading climate claims, selective disclosure, greenwashing, covert influence, and disinformation should be strongly discouraged and should not feature in official or host-controlled COP31 spaces

Advertising and promotional activities associated with COP31 are encouraged to be transparent, substantiated, and consistent with these Principles.

The Presidency may consider establishing a Communications Integrity Review function to support the screening of sponsored content, exhibition materials, and branded activations prior to publication or display. Where materials are found to contain misleading environmental claims, unsubstantiated net-zero commitments, or content that diverges from widely accepted scientific evidence, appropriate steps, such as revision or non-use, may be considered.

The Presidency is encouraged to develop and publish a clear and accessible policy on the use of artificial intelligence in COP31 communications and promotional materials. This may include guidance on the disclosure of AI-generated content, as well as safeguards against the use of AI for misleading purposes, such as synthetic endorsements, fabricated statements, or manipulated imagery.

Where the Presidency becomes aware of potential disinformation related to COP31, whether originating from an accredited entity, a sponsor, or a third party, it may consider issuing timely clarifications and, where appropriate, referring the matter to the relevant oversight mechanism, such as the COP31 Integrity Panel, for further review.

10 PROCUREMENT, FINANCE AND LABOUR INTEGRITY

Tenders, concessions, and procurement processes related to COP31 are expected to be documented, reviewable, and supported by appropriate anti-corruption safeguards. Contracts may include provisions addressing anti-bribery, conflicts of interest, labour rights, environmental compliance, subcontractor responsibilities, data protection, monitoring, and termination in case of non-compliance.

Workers engaged in the delivery of COP31 need to benefit from fair recruitment practices, safe working conditions, dignified treatment, access to grievance mechanisms, and protection from retaliation.

Procurement processes need to be conducted openly, competitively, and in a well-documented manner. Direct awards may be used only in exceptional circumstances and could be supported by written justification and appropriate oversight. For higher-value procurement decisions, independent review mechanisms may be considered prior to contract execution, in line with the COP31 Procurement Policy.

The Host Country is encouraged to undertake a labour rights impact assessment covering major COP31-related activities, including construction, logistics, catering, and services, with particular attention to subcontracted and informal workers. Consideration may be given to publishing the findings of this assessment and, where relevant, developing appropriate follow-up measures in consultation with labour rights stakeholders.

Transparency in financial flows is encouraged across all major sources, including Host Country's public contributions, sponsorship income, UNFCCC Secretariat support, and in-kind contributions. The Presidency may consider publishing an audited financial summary within a reasonable period following the Conference. The involvement of an independent audit function, free from material conflicts of interest, may further support the credibility of this process.

11 COMPLAINTS, WHISTLEBLOWING AND REMEDY

COP31 is expected to establish an independent, multilingual, and accessible mechanism for receiving complaints, reports, suggestions, and requests related to integrity, rights concerns, procurement, sponsorship, labour conditions, accessibility, safety, and related matters.

Anonymous reporting needs to be enabled, where lawful and feasible. Individuals who raise concerns in good faith are expected to be protected from retaliation, and submissions may be tracked, assessed, and addressed within indicative timelines.

The Complaints and Reporting Mechanism is encouraged to be operational sufficiently in advance of COP31 (for example, up to 12 months prior). It may be made accessible through multiple channels, such as a dedicated web platform, a multilingual telephone line, and an on-site

presence at the COP31 venue. Consideration may be given to ensuring that these channels are supported by trained personnel operating independently from sponsorship, procurement, and communications functions.

Upon receipt of a complaint, the Mechanism may acknowledge submissions within a short timeframe (for instance, within two working days), provide an initial assessment within a reasonable period (such as ten working days), and communicate a response or referral within an indicative timeframe (for example, within forty-five calendar days), while allowing flexibility for more complex cases.

Retaliation against individuals who submit concerns in good faith, or who cooperate with related processes, is strongly discouraged. The Presidency is encouraged to promote safeguards that protect against retaliation and, where appropriate, facilitate access to independent support or advisory services throughout any review or investigation process.

12 OVERSIGHT, ENFORCEMENT AND LEGACY REPORTING

An independent COP31 Integrity Panel or Ombudsperson is encouraged to oversee the implementation of these Principles. Such a body may be entrusted with functions including requesting relevant information, reviewing due diligence processes, recommending corrective measures, and, where appropriate, referring matters to competent authorities, including the UNFCCC Secretariat.

In cases of non-compliance, a range of proportionate responses may be considered, including warnings, corrective measures, suspension, removal of branding, termination of agreements, exclusion from programmes, or referral to relevant authorities, as appropriate.

The Presidency is encouraged to support transparency throughout the COP31 cycle by publishing an implementation note ahead of the Conference, providing periodic updates during the Conference, and facilitating an independent post-event report within a reasonable timeframe (for example, within six months). This report may assess implementation, complaint handling, actions taken, lessons learned, and recommendations for future COP hosts.

The Integrity Panel can be composed of a diverse group of members (for example, at least five), selected through a transparent process. Members are expected to serve in their individual capacity and to be free from relevant conflicts of interest. Consideration may be given to including expertise across areas such as anti-corruption, human rights, climate governance, and civil society, and to enabling participation or nomination input from accredited civil society organisations.

To support its effective functioning, the Panel may be provided with an appropriate secretariat, operational resources, and, where necessary, access to independent expertise. Panel deliberations may be documented, and summary outcomes could be made publicly available within a reasonable timeframe, subject to applicable legal considerations.

The post-event report may be shared with the UNFCCC Secretariat as a contribution to ongoing discussions on host country practices and integrity standards. The Presidency may also consider presenting key findings in subsequent COP processes, with a view to supporting continuity and learning across future COP cycles.

13 POLICY ENGAGEMENT AND INTERNATIONAL PROCESSES

In addition to the Principles set out above, the COP31 Presidency is encouraged to contribute to ongoing discussions on integrity within UNFCCC processes and other relevant international platforms. Strengthening integrity at a systemic level may help support the credibility, transparency, and resilience of climate negotiations.

In this context, the Presidency may wish to encourage consideration of integrity-related aspects, such as transparency, disclosure, and conflict of interest safeguards, within relevant UNFCCC discussions and decision-making processes.

The Presidency is also encouraged to facilitate inclusive and structured dialogue among Parties, the private sector, and civil society, with a view to sharing good practices and exploring common approaches to managing conflicts of interest and safeguarding the credibility of COP processes.

Through such engagement, the Presidency may contribute to fostering broader understanding, continuity, and momentum for the progressive strengthening of integrity standards across future COP cycles.

ANNEXES

ANNEX 1 ELIGIBILITY AND EXCLUSION MATRIX

Purpose: This Matrix sets out the criteria and indicators used to assess whether a prospective sponsor, partner, exhibitor, or major contractor is eligible to participate in COP31. It shall be used in conjunction with the Sponsor and Partner Due Diligence Checklist (Annex III).

Category	Indicators of Ineligibility	Assessment Standard
Corruption & Financial Crime	Conviction or pending prosecution for bribery, fraud, money laundering, tax evasion, or sanctions violations in any jurisdiction within the past ten years	Mandatory exclusion if conviction; risk assessment if pending prosecution
Human Rights & Labour	Documented pattern of forced labour, child labour, or systematic health and safety violations; subject to UN or EU human rights sanctions	Mandatory exclusion for sanctions; enhanced due diligence otherwise
Environmental Conduct	Regulatory enforcement for major environmental violations; pending litigation for environmental damage; systematic non-compliance with environmental permits	Enhanced due diligence; exclusion where remediation absent
Climate Lobbying	Active membership of trade associations that lobby against UNFCCC positions; expenditure on climate lobbying materially exceeding climate investment	Ineligible absent credible disengagement commitment with monitoring
Disinformation & Greenwashing	Two or more upheld greenwashing findings by a national advertising regulator within five years; documented climate disinformation campaigns	Mandatory exclusion for disinformation; conditional eligibility for greenwashing with corrective action plan
Paris Agreement Alignment	Core business model dependent on expansion of unabated fossil fuel extraction inconsistent with IEA Net Zero Scenario	Ineligible for primary sponsorship; assessed case-by-case for exhibition
Beneficial Ownership	Beneficial ownership not disclosable due to secrecy jurisdiction or complex ownership structure that prevents meaningful integrity assessment	Ineligible pending full disclosure
Reputational Risk	Public record of conduct that would, in the reasonable assessment of the Integrity Panel, bring the COP31 process into disrepute	Discretionary exclusion following Panel recommendation

ANNEX 2 CONFLICT OF INTEREST DISCLOSURE FORM

Purpose: This Form is intended to be completed by senior officials, advisers, and decision-makers involved in COP31 planning and delivery, ideally prior to their appointment or engagement, and updated in a timely manner in the event of any material change in circumstances (for example, within five working days).

Section A -Personal Information

Field	Response
Full Name	
Title / Role	
Appointing Entity	
Date of Appointment	
Reporting Line	
Date of This Disclosure	

Section B -Financial Interests

Please disclose any financial interest -direct or indirect -in an entity that is, or is reasonably likely to become, a sponsor, partner, contractor, or exhibitor of COP31.

Entity Name	Nature of Interest	Estimated Value

If none, please state: [] *I have no financial interests to disclose.*

Section C -Professional and Organisational Affiliations

Please disclose any current or recent (within three years) employment, consultancy, board membership, advisory role, or voluntary position with an entity that is, or is reasonably likely to become, a sponsor, partner, contractor, or exhibitor of COP31.

Entity Name	Role	Period	Status

If none, please state: [] *I have no professional affiliations to disclose.*

Section D -Personal and Family Relationships

Please disclose any close personal or family relationship with a senior representative of an entity that is, or is reasonably likely to become, a sponsor, partner, contractor, or exhibitor of COP31. For these purposes, 'close personal or family relationship' includes spouse or partner, parent, sibling, child, and any other person with whom you share a household or a financial dependency.

Entity Name	Name of Individual	Nature of Relationship

If none, please state: [] *I have no personal or family relationships to disclose.*

Section E -Declaration

I declare that the information provided in this Form is complete and accurate to the best of my knowledge. I understand that failure to disclose a material conflict of interest, or the provision of false or misleading information, may result in recusal from relevant functions, suspension, or termination of my role in connection with COP31.

I undertake to update this Form within five working days of any material change in the information disclosed herein.

Signature:	
Date:	
Reviewed by (Integrity Panel):	
Outcome (No conflict / Managed / Recusal):	

ANNEX 3 SPONSOR AND PARTNER DUE DILIGENCE CHECKLIST

Purpose: This Checklist is intended to be completed for prospective sponsors, partners, exhibitors, and major contractors prior to the execution of any agreement. It may be subject to review by an appropriate oversight mechanism, such as the COP31 Integrity Panel, and retained in line with applicable record-keeping practices (for example, for a period of up to seven years).

Instructions: Each item may be assessed as Satisfied (S), Not Satisfied (NS), Partially Satisfied (PS), or Not Applicable (NA). Where items are assessed as NS or PS, it is encouraged that a brief explanation and corresponding risk assessment be provided. Criteria identified as mandatory exclusion criteria (M) are intended to signal areas of heightened concern and would not ordinarily be addressed solely through mitigation measures.

A - Corporate Identity and Beneficial Ownership

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
A1	Full legal name, jurisdiction of incorporation, and registration number confirmed against official registry		
A2	Beneficial ownership structure disclosed to the satisfaction of the Integrity Panel (UBO threshold: 10%)	M	
A3	No ownership interests held through secrecy jurisdictions that prevent meaningful beneficial ownership assessment	M	
A4	Organisational chart provided covering all entities with decision-making authority over COP31 engagement		

B - Anti-Corruption and Financial Crime

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
B1	No conviction for corruption, bribery, fraud, or money laundering in any jurisdiction within the past ten years	M	
B2	No pending investigation or prosecution for corruption, bribery, fraud, or money laundering that could materially affect the entity's participation in COP31		
B3	Not listed on UN, EU, US OFAC, or UK OFSI sanctions lists	M	
B4	Anti-corruption policy and internal controls assessed as adequate for the scale and nature of the entity's operations		
B5	No material adverse findings in prior government or multilateral organisation due diligence assessments		

C - Climate Lobbying and Policy Conduct

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
C1	Climate lobbying expenditure disclosed and assessed against climate investment and public climate commitments		
C2	Not an active member of a trade association that has publicly lobbied against UNFCCC negotiating positions or Paris Agreement implementation within the past three years, or credible disengagement commitment provided	M	
C3	No record of financing or commissioning climate disinformation campaigns	M	
C4	No litigation against a government or regulator seeking to delay, block, or reverse climate legislation or a climate target		
C5	Business model assessed for consistency with IEA Net Zero Scenario pathways		

D - Environmental and Human Rights Conduct

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
D1	No material regulatory enforcement actions for environmental violations within the past five years, or documented remediation completed		
D2	No credible findings of forced labour, child labour, or human trafficking in own operations or first-tier supply chain	M	
D3	Not subject to UN human rights sanctions or listed in UN Group of Experts reports for human rights violations	M	
D4	Environmental and social management system assessed as adequate for the scale and sector of operations		
D5	Supply chain due diligence process assessed for compliance with applicable mandatory human rights due diligence legislation		

E - Greenwashing and Communication Integrity

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
E1	No more than one upheld greenwashing finding by a national advertising regulator within the past five years		
E2	No mandatory exclusion for two or more upheld greenwashing findings (see Annex I)	M	
E3	Climate and sustainability claims in recent public communications assessed against IPCC findings and entity's verified performance data		
E4	Net-zero or carbon neutrality claims verified against a recognised third-party standard (SBTi or equivalent)		

F - Labour and Workers' Rights

Ref	Criterion	M/Disc.	Finding (S/NS/PS/NA)
F1	No material adverse findings regarding fair recruitment, living wage, or worker safety in own operations within the past three years		
F2	Grievance mechanism for workers assessed as accessible, confidential, and non-retaliatory		
F3	No pending or concluded strike action, collective labour dispute, or regulatory enforcement action in connection with COP31 delivery activities		

Overall Assessment

Field	Details
Recommendation	☐ Eligible ☐ Eligible with conditions ☐ Ineligible
Conditions / Mitigations required (if any)	
Mandatory exclusion triggered (Y/N)	
Reviewed by	
Date of Review	
Integrity Panel sign-off	

ANNEX 4 COMPLAINTS, INVESTIGATION AND SANCTIONS PROTOCOL

Purpose: This Protocol governs the receipt, triage, investigation, determination, and sanctioning of complaints and reports submitted under Section 11 of the Clean COP31 Integrity Principles. It is administered by the COP31 Integrity Panel.

Part 1 - Submission and Triage

1.1 Complaints and reports may be submitted through any of the following channels:

- Online portal (available in English, Turkish, French, Spanish, and Arabic)
- Multilingual telephone hotline (staffed during COP31 venue hours; voicemail available outside hours)
- Physical desk at the COP31 venue (staffed during Conference hours)
- Secure encrypted email channel published on the COP31 website

1.2 Anonymous submissions are permitted. The Mechanism is not expected to take steps to identify anonymous complainants. This reflects the distinction between enabling anonymous reporting and ensuring that no active efforts are made to verify or disclose the identity of individuals who choose to remain anonymous.

1.3 Upon receipt, the Mechanism shall issue a written acknowledgement within two working days, including a unique case reference number.

1.4 Within ten working days of acknowledgement, the case shall be triaged into one of the following categories:

Category	Description	Initial Action
Category A	Allegation of mandatory exclusion trigger, serious human rights violation, or criminal conduct	Immediate referral to Integrity Panel; possibility of interim measures
Category B	Breach of these Principles not involving Category A matters; significant procedural non-compliance	Investigation within 30 days
Category C	Concern or suggestion not constituting a breach; request for clarification or information	Response within 15 working days
Out of Scope	Matter outside the jurisdiction of these Principles	Referral to competent body with reasons; case closed

Part 2 - Investigation

2.1 Investigations shall be conducted by the Integrity Panel or by an independent investigator appointed by the Panel. The investigator shall have no material conflict of interest with any party to the complaint.

2.2 The respondent entity or individual shall be notified of the allegation and provided with a reasonable opportunity -not less than ten working days -to respond in writing before any adverse finding is made.

2.3 The Panel may, in the course of an investigation:

- request documents, records, and data from any entity subject to these Principles;
- interview relevant individuals with their consent;
- appoint independent expert advisers;
- impose interim measures, including suspension of an entity's participation in COP31 activities, where necessary to prevent harm or the destruction of evidence; and
- refer matters to law enforcement or regulatory authorities where there is credible evidence of criminal conduct.

2.4 Investigations shall be completed within forty-five calendar days of triage, unless the Panel determines that complexity requires an extension, in which case the complainant and respondent shall be notified with a revised timeline and reasons.

Part 3 - Determination and Sanctions

3.1 Following an investigation, the Panel shall issue a written determination setting out the factual findings, the applicable Principle(s), the conclusion, and any recommended sanction.

3.2 The following sanctions are available, and may be applied individually or in combination:

Sanction	Description	Applicable To
Formal Warning	Written notice of breach with required corrective action and timeline	All entities
Corrective Action Plan	Mandatory implementation of specified remediation measures within a defined period, with monitoring	All entities
Suspension	Temporary suspension of participation in specified COP31 activities pending compliance	Sponsors, exhibitors, contractors
Removal of Branding	Removal of COP31 branding rights from all materials and communications	Sponsors, partners
Termination	Termination of sponsorship, partnership, or contractor agreement without compensation where a material breach is established	Sponsors, partners, contractors
Exclusion	Exclusion from all COP31 activities and programmes for the duration of the Conference cycle	All entities
Referral	Referral to UNFCCC Secretariat, law enforcement, or relevant regulator with supporting documentation	All entities

Part 4 - Appeals

4.1 A respondent that receives an adverse determination may submit a written appeal to the Panel within fifteen calendar days of notification of the determination.

4.2 An appeal may be made on the following grounds only:

- a material error of fact in the Panel's findings;
- a serious procedural irregularity that prejudiced the respondent's ability to present its case; or
- a sanction that is manifestly disproportionate to the established breach.

4.3 The Panel shall constitute an appeal committee of at least two members who were not involved in the original determination. The appeal committee shall issue a written decision within twenty working days of receipt of the appeal.

4.4 The decision of the appeal committee is final within the COP31 complaints process, without prejudice to any rights of recourse available under applicable law.

Part 5 - Publication and Reporting

5.1 The Panel shall maintain a public register of complaints received, categorised by type, triage outcome, and -for completed cases -determination outcome. The register shall not include information that would identify individual complainants or witnesses.

5.2 Determinations that result in a sanction of suspension, termination, removal of branding, exclusion, or referral shall be published in summary form within ten working days of becoming final, subject to any legally necessary redactions.

5.3 The Panel shall include a full complaints and enforcement report -covering all cases received, investigated, determined, appealed, and sanctioned -in the COP31 post-event legacy report required under Section 12 of these Principles.

Clean COP31 Integrity Principles

Transparency International Türkiye | April 2026

Legal and Policy References

I International Legal Instruments

- 1 United Nations Framework Convention on Climate Change (UNFCCC), 1992, UNTS 1771.
- 2 Paris Agreement under the UNFCCC, 2015, UNTS 3156.
- 3 UN Guiding Principles on Business and Human Rights, UN Doc. A/HRC/17/31 (2011).
- 4 United Nations General Assembly, 1985.

II UNFCCC Decisions, Procedures and Institutional Framework

- 1 UNFCCC Secretariat, How to COP: A Handbook for Hosting United Nations Climate Change Conferences (2020).
- 2 UNFCCC, FCCC/CP/1996/2 (applied but not formally adopted).
- 3 UNFCCC COP30, FCCC/CP/2025/L.13 (22 November 2025).
- 4 UNFCCC (official webpage).

III Host Country Agreements and Legal Framework Analysis

- 1 Amnesty International (July 2024).

IV COP Governance, Lobbying and Integrity Risks (Civil Society & Reports)

- 1 Transparency International & Anti-Corruption Data Collective, COP Co-opted? (2024).
- 2 Global Witness.
- 3 Corporate Europe Observatory / Global Witness / Kick Big Polluters Out (2024).
- 4 Kick Big Polluters Out / Global Witness (2025).

V Background Analysis: COP28 (United Arab Emirates)

COP28

- 1 Global Witness (2024).
globalwitness.org/en/press-releases/new-investigation-reveals-how-the-cop28-president-used-role-to-pursue-oil-and-gas-deals/
- 2 Transparency International (2023–2024).
www.transparency.org/en/projects/climate-governance-integrity-programme/uae-state-oil-company-has-access-to-cop28-climate-summit-emails
- 3 BBC / Centre for Climate Reporting (2023).
www.bbc.com/news/science-environment-67508331

VI Background Analysis: COP29 (Azerbaijan)

COP29

- 1 Transparency International.
www.transparency.org/en/publications/cop-co-opted-how-corruption-and-undue-influence-threaten-multilateral-climate-action
- 2 Amnesty International & CIVICUS (2024).
www.civicus.org/index.php/media-resources/news/7395-azerbaijan-stop-assaults-on-civil-society-and-climate-justice-as-cop29-starts-today
- 3 OCCRP (2024).
www.occrp.org/en/project/know-your-host/azerbaijans-cop29-organizers-criticized-for-oil-ties-other-potential-conflicts-of-interest

VII Türkiye Context

- 1 Paris Agreement ratified by Türkiye on 6 October 2021.
Reuters: www.reuters.com/business/environment/turkey-ratifies-paris-climate-agreement-last-g20-country-do-so-2021-10-06/
UNFCCC: unfccc.int/node/61221
- 2 Climate Action Tracker (2023).
climateactiontracker.org/countries/turkey/

VIII. International Standards and Technical Frameworks

- 1 International Energy Agency (2021).
www.iea.org/reports/net-zero-by-2050
- 2 Science Based Targets initiative (v1.2, 2023).
sciencebasedtargets.org/net-zero
- 3 OECD.

X. Governance, Lobbying and Anti-Corruption Standards

- 1 OECD.
- 2 Transparency International.

X. Ek Savunuculuk, Araştırma ve Politika Kaynakları

- 1 Transparency International.
- 2 Transparency International (2026)
www.transparency.org/en/blog/cop31-turkey-australia-fossil-fuel-influence
- 3 IPCC reports.
- 4 UNESCO.
5. COP30 Information Integrity Declaration.

XI. Analytical Mapping for Policy Design

- **Paris Alignment / Eligibility Criteria**
IEA Net Zero (2021), SBTi Net-Zero Standard
- **Fossil Fuel Influence & Lobbying Risks**
TI Fuelling Delay (2025), COP Co-opted? (2024), Global Witness
- **Conflict of Interest & Due Diligence**
UNGPs (2011), OECD Guidelines (2023), OECD Lobbying Recommendation
- **Procurement Integrity & Anti-Corruption**
TI Clean Contracting, SOE Principles (2017)
- **Information Integrity & AI Governance**
UNESCO frameworks, COP30 Information Integrity Declaration

