Green Claims Policy

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Introduction

As signatories of The Anti-Greenwash Charter, we are committed to upholding the highest standards of responsible marketing and communications practice. The purpose of our Green Claims Policy (GCP) is to define the practices we adopt throughout Hattrick and the work we undertake for clients to ensure any green claims made about our / their products/services are accurate and substantiated.

This policy applies to all the forms of content we produce for ourselves and our clients including both on- and offline; social media, direct marketing, events, speaking opportunities, thought leadership, PR and reports.

To ensure ongoing compliance, we review and assess our own marketing and communications campaigns against our GCP on a six-monthly basis - or at the beginning of a new campaign - verifying that all claims are evidence-backed and responsibly communicated.

In addition to this policy, all marketing and communications must at all times comply with the relevant local laws and regulations.

Client Content Approval

As a communications consultant we also recognise our responsibility in advising and producing content for our clients.

Hattrick is dedicated to ensuring that all marketing and communications materials meet the highest standards of transparency and integrity. Before any campaign is approved for distribution, we perform a comprehensive review of all content provided by our clients. This includes verifying environmental claims against credible evidence, ensuring clear and accurate language and assessing visual elements for alignment with the message being conveyed.

Any content that fails to meet these standards is revised in consultation with our clients to uphold our commitment to responsible marketing practices and compliance with The Anti-Greenwash Charter.

Our standards

We commit to the standards of practice set out in **The Anti-Greenwash Charter**, which are as follows:

Transparency.
We commit to clear communication of what environmental benefit our product or service offers and won't conceal or omit information.

Accountability.
We substantiate our green claims with accurate and regularly evaluated empirical evidence. We commit to sharing facts, figures and statements that can be checked.

Fairness.
We commit to using fair, clear and unambiguous language when providing comparisons with other products or organisations.

Honesty.
We will ensure we make specific statements about our organisation's environmental efforts and that our actions match those promises.

Where we could improve

As a Certified B Corp we're wholeheartedly committed to balancing people, planet and profits. We believe in continuous improvement in all our sustainability practices and conduct a thorough assessment of our operations annually to identify areas where we can further reduce our environmental impact.

We produce and publish our findings in an annual impact report.

Recent evaluations have highlighted opportunities for greater supply chain transparency, the need for understanding our digital carbon footprint better especially the environmental impact of using AI.

To address these areas, we have set specific targets, such as increasing the number of minority suppliers and partners that we work and collaborate with, exploring tools to track our website performance and investing in AI-training and learning across the team. We regularly review our progress towards these goals and adjust our strategies as needed to ensure we remain at the forefront of sustainable practices.

Our practices

We implement the following practices and procedures to ensure we uphold the aforementioned standards:

- Clearly define the green terms we use
- Provide third-party verified evidence for the claims we make
- Set standards for authentic and accurate visual representation
- Outline a clear editorial process
- Detail the training we provide our employees
- Ensure responsible use of AI in content creation
- Implement an escalation procedure
- Share our approach to stakeholder education
- Explain how we support partners and collaborators
- Commit to independent reviews and effective governance
- Maintain strict legal compliance

Verified Claims Database

We collaborate with trusted third-party verifiers to ensure our claims are specific, relevant and aligned with lifecycle principles.

We also work closely with clients to stress the importance of having these in place offering training and support.

Claim	Third-party Verifier	Evidence link
HT carbon footprint calculation	SME Hub - 'Normative'	Hattrick impact report
Certified B Corp	B Corp	https://www.bcorporation.net/en-us/find-a-b-corp/company/we-are-hattrick-ltd/
Certified Carbon Literate	The Carbon Literacy Project	Folder with certificates
Certified Carbon Literacy Trainer	The Carbon Literacy Project	Certificate here

If you come across a claim you don't understand and can't find it on this list, please email malin.cunningham@wearehattrick.com for clarification.

Use of Imagery & Colour

In our commitment to clear and transparent communication regarding sustainability efforts, we appreciate that images can evoke certain responses or perceptions. When looking at visuals to accompany content, the brief always asks for:
1) something reflecting the writing
2) something representative of the market
3) alignment with our own brand guidelines or the client brand guidelines

The following guiding principles inform imagery and visual selection choices.

• **Authentic Imagery:** As a small business without its own creative team, we do rely on the use of stock imagery in some instances but focus on sourcing something that reflects who we're working with and what we do in order that we do not mislead anybody or exaggerate what we're doing. We actively avoid the use of imagery typically associated with sustainability such as hands around the earth or plants, nature and greenery and advise our clients in the same way.

Furthermore, wherever possible, we favour the use of our own imagery from events and try to do this as much as possible for social and web content.

• **Avoidance of Greenwashing through Colours:** In the same way that certain photography can infer sustainability, we're aware that colours can do the same and colour selection is done primarily with our brand guidelines / the client brand guidelines in mind. The Hattrick colours are quite bright and although we do have a green, it's used in combination with the rest of the colour palette.

• **Highlighting actual efforts:** When showcasing sustainability projects or achievements visually, we aim for images from actual initiatives that have been undertaken, avoiding generic or unrelated imagery that may give a false sense of the environmental impact or efforts.

• **Cultural & Environmental Sensitivity:** We ensure that any imagery used respects the cultural, environmental, and socio-economic context of the regions or communities depicted. We avoid the use of stereotypes or showing things out of context.

• **Informative Infographics:** When possible, we believe that infographics are a great way to show complex information in a simple, easy to understand way. We'll always

reference the source for the information being shown so that people understand where it has come from and can look into further detail if they wish.

If you are concerned about anything regarding the imagery and colours used in content we've been involved in producing, or you believe we may not be adhering to the standards set out in this section, please contact malin.cunningham@wearehattrick.com. We appreciate feedback and are committed to maintaining what we set out to as signatories of the Anti-Greenwash Charter.

Editorial Processes

Every piece of content containing green claims produced by Hattrick for ourselves or on the behalf of our clients is reviewed by two senior communications specialists before publication and distribution - one of who isn't involved with the campaign or content produced.

When writing content, our team refers to our list of clearly defined terms and verified claims, updating the lists when using a new term or claim. We recognise and reward staff members who challenge our green claims.

Training

Induction

Sustainability is central to the Hattrick brand and values so is covered at length in the induction process. All new starters complete our Net Zero Masterclass to become certified Carbon Literate.

Their induction also includes the following learnings and insights:

- The Anti-Greenwash Charter: what it is, why it matters and the standards set out
- Our Hattrick Green Claims Policy: told what the policy covers, why it exists and what it means for their role
- Employee handbook: sections 9 - 11 specifically includes our environmental policy with dedicated section on working from home and green business travel policy
- Being a B Corp, what that means and specific goals relating to climate action

- The Hattrick Greenwashing guide: providing insights for sales and marketing professionals to make sense of sustainability and avoid falling into greenwashing's trap.
- Better Business Network member; this is an inclusive nationwide community for purpose driven businesses that want to make the world a better place. Our membership means that our team has access to a powerful network of individuals at the forefront of sustainability

Use of AI

We utilise AI tools primarily to assist with brainstorming, supporting and speeding up our thinking. We also use it for industry and sector insights, pulling together summaries of documents and the creation of content structure.

To maintain the integrity of our green claims, all AI-generated content is rigorously reviewed by our human editors before publication.

Our editorial team ensures that the content aligns with our sustainability values, verifies the accuracy of any green claims and cross-checks the use of key terms against our defined list.

We also provide transparency by disclosing the use of AI where it has significantly contributed to the creation of content.

Additionally, we conduct regular audits to assess the impact and accuracy of AI-generated content, ensuring continuous alignment with The Anti-Greenwash Charter's standards.

Escalation procedure

It's vital that any stakeholders understand the marketing and comms messages we're responsible for putting out there and are clear about any green claims being made. We welcome people to come forward with questions or concerns regarding green claims, ensuring we respond to those within three working days.

To support this, we have added our Certified Signatory Declaration (below) to our website and include it for any relevant campaigns we're involved in, highlighting our commitment to transparency and welcoming feedback.

The declaration encourages stakeholders to review our Green Claims Policy and includes 1) who to contact at Hattrick with any concerns or 2) who to contact at The Anti-Greenwash Charter for independent review.

Certified Signatory Declaration:
If you have any questions or feedback on this policy or green claims being made by ourselves or on behalf of our clients, please email your normal contact at Hattrick or malin.cunningham@wearehattrick.com for clarification.

Alternatively, you can submit any greenwashing concerns directly to The Anti-Greenwash Charter for an independent review here.

In the event that a green claim is escalated, the following process is in place to be able to rectify and learn from any confusing or misleading information.

Cause and documentation

- Record the incident in a Green Claims log covering
    - Date and nature of the issue
    - Description of the misleading claim and how it was identified
- Identify how the issue occurred e.g. out of date info, lack of substantiation

Internal Debrief

- Schedule a short debrief within 5 working days that covers:
    - What went wrong
    - What checks failed or were missed?
    - How do we prevent it from happening again?

Update the content / green claim in question

- Amend any affected content or sustainability copy

Stakeholder Education

When it comes to the climate and environment, we take the education of our own team and clients teams seriously at Hattrick. We know that an understanding of the challenges is the first step towards helping to tackle them so we develop training and content throughout the year to help with this.

Certified Carbon Literacy training courses

Hattrick has developed a number of dedicated training courses that have been accredited by The Carbon Literacy Project.

Two courses - our 'Net Zero Masterclasses' - have been developed to support our clients' understanding of 'net zero' and the green economy. We run monthly training programmes that are open to any businesses looking to educate their teams - not just our existing clients.

The courses are run over 2 x half days sessions covering the following content:

- The business opportunities and threats associated with climate change
- What is climate change, net zero and offsetting; and why does it all matter?
- Where does the circular economy, embodied carbon and science based targets fit in?
- What key commitments have been made; globally, nationally and in industry?
- 5. What is greenwash/green hush, how do we avoid it and what does best practice look like?

Our Masterclass is the only accredited Carbon Literacy course that currently has an entire section dedicated to greenwashing, showing our commitment to this being avoided across our work and that of our clients.

21st Century Leadership

In 2026, we also created and launched an accredited Carbon Literacy course for senior leadership teams and boards through the lens of corporate governance. Again, an entire module is dedicated to educating leaders on building trust with its stakeholders through responsible and transparent communications.

Refresher training

We have also developed a refresher course for Net Zero masterclass alumni, to ensure that our employees and external alumni have the latest facts, goals and information when it comes to climate change.

It also includes updated greenwashing regulations and best practise around how to communicate on an organisation's sustainability journey and progress.

Carbon Literacy Toolkit
We've developed a large asset bank of reports, insights and useful materials that help people understand the green industry, terms, challenges and watch outs so people are confident about what is meant when they make certain claims.

Greenwashing course
In addition to the Net Zero Masterclass, the team has also developed a separate CPD-accredited half day training course that focuses exclusively on greenwashing covering what it is, why it's important and how to avoid it.

This is an interactive, pragmatic and practical course that explores the different types of greenwashing (including greenhushing) and how to avoid it. It uses case studies to bring the content to life and includes an overview of the Green Claims code and other key regulations that may affect the organisations.

There is also time set aside for reflection on the business's own messaging and for everyone to put together an action plan for how to improve their own communications.

Podcast
We have launched an anti-greenwashing podcast in partnership with Katie Treggiden - Spill the (Green) Tea - which supports organisations and individuals navigating sustainability claims.

It features practical and inspirational interviews with individuals from across the business community with different perspectives around the opportunities and challenges associated with sustainability communications.

Webinars
We aim to deliver a minimum of 1 webinar a quarter that supports businesses when it comes to communicating their progress, sustainability goals and actions. Inviting subject matter experts is important as it offers different perspectives and insights.

Partnerships & Collaborations

At Hattrick, we're committed to using marketing as a force for good. As a certified B Corp as well as signatories of the Anti-Greenwash Charter, we hold ourselves and the clients we work with accountable to high standards of transparency, impact, and integrity.

We believe collaboration is key in driving positive change and work closely with our network of partners, suppliers and collaborators to get behind sustainability and embed responsible marketing practices across the board.

Our collaborators include organisations and industry individuals including The Carbon Literacy Project, The Anti-Greenwash Charter, Futurebuild, Firstplanit, ProManchester, Karen Revel-Chion and Katie Treggiden.

Our approach includes:

- Collaborating and commissioning original research on attitudes around sustainability and greenwashing
- Sharing our thinking on communication and storytelling - using clear, simple language and making it relevant to the audience
- Hosting regular webinars and training as outlined above to better understand sustainability in practice - from operational impact to effective comms
- Offering training to The Anti-Greenwash Charter signatories to support them on their sustainability journey and how they communicate both internally and externally
- Providing open access to key documentation, including policies, frameworks, and reports
- Speaking at industry events, conferences and on panels about greenwashing including the BusinessGreen Live, Ceramics UK Net Zero Conference and The Better Business Summit
- Providing info on key third party resources to support organisations on their sustainability journey and how to communicate this internally and externally including:
    - The Anti-Greenwash Charter
    - Pinwheel
    - Firstplanit - for businesses in the Built Environment
    - Podcasts including: The Responsible Edge, Can Marketing Save the Planet

Reviews of Content

To ensure ongoing compliance, we review and assess our own marketing and communications campaigns against our GCP on a six-monthly basis - and / or at the beginning of a new campaign - verifying that all claims are evidence-backed, and responsibly communicated.

During these audits, we also review new developments in the industry to identify benchmarking opportunities.

Additionally, we undertake an annual review of all 'static' content - such as website pages and key documents - to ensure compliance with any updates to the Charter's standards, changes in relevant regulations, or adjustments to our organisation's GCP. This ensures our communications remain aligned with the latest expectations for transparency and responsibility.

By incorporating both regular audits and an annual comprehensive review, we ensure our content consistently reflects the highest standards of responsible marketing and communications.

Digital Carbon Footprint

As a comms consultancy we are very conscious of the digital carbon footprint of our work and that of our clients.

It is easy to overlook the impact of the tools, content and data that we create and store as they are tucked away online and hidden in the cloud. In reality, the global 'digital' carbon footprint is growing exponentially with the fast expansion of 'smart' devices, our 'always on' culture and AI.

To start tackling this, we have taken a number of actions already, but also acknowledge that we have a lot more to learn in this area - particularly around the environmental impact of AI.

Actions taken:

- Moved to a green web hosting provider with Krystal
- Introduced a section on digital carbon footprints in our accredited Net Zero Masterclasses and Greenwashing training courses
- Using links rather than attachments in emails

- Regular clearouts of emails, images and large documents to reduce the amount of data stored digitally
- Keeping the file size of images and videos as low as possible without impacting on quality

Other actions underway:

- Exploring tools that will help identify ways to reduce the carbon footprint across our website. Once we have a plan we will share these with clients and partners
- Communicating more over messaging platforms rather than relying exclusively on email for our internal communications
- Actively learning about the impact of using AI as more information and insights become more widely available

Legal Compliance

Our commitment to legal compliance is unwavering, particularly in the area of green claims. We have established a comprehensive legal compliance framework that includes regular internal audits, ongoing employee training and collaboration with external legal experts where relevant. The latter is primarily in regard to client content.

Our marketing and communications content - and that which we produce on behalf of clients - is thoroughly reviewed to ensure it complies with all relevant local and international laws, including those related to environmental advertising and data privacy.

We also stay informed about regulatory changes and update our practices accordingly to ensure continuous compliance.

Any instances of non-compliance are promptly addressed, and corrective actions are taken to prevent future occurrences.

Governance of this Policy

Our managing director, Malin Cunningham is ultimately responsible for ensuring that our compliance with this Green Claims Policy is reviewed every six months.

Any non-compliance with this policy will be brought to the attention of the Leadership Team, who will decide on further actions and whether the matter should be escalated further.

Everyone within the organisation is responsible for following the practices, instructions and operating models in line with the Green Claims Policy.

Before entering into new partnerships with third parties, such as suppliers and clients we share our Green Claims Policy with them to encourage adoption of similar standards. We also encourage them to become 'Carbon Literate' and complete our Net Zero Masterclass.

Independent Reviews

We've signed the Anti-Greenwash Charter, which means we've promised to be open and responsible when talking about sustainability in our marketing or any marketing material we produce on behalf of our clients.

We understand that selected campaigns may be reviewed by independent third parties (via the Anti-Greenwash Charter) and that audit reports may be made public.

To make sure we're adhering to the standards, we welcome independent reviews of how green claims are communicated and what we say publicly about sustainability efforts.

These reviews help make sure we're sticking to best practice and we understand that if we understand that if we're found not to be adhering to what we've set out to in this policy, we may lose our status as a certified signatory of the Anti-Greenwash Charter.

Green Terms Glossary

We define the key 'green' terms we use to describe our services to ensure our claims are clear, consistent, transparent and compliant with the latest standards. We use some key trusted sources for our glossary: Edie's Jargon Buster, BBC News Climate Glossary :

Term	Definition
1% for The Planet	A global network of thousands of incredible businesses and environmental organisations working together to support people and the planet. Businesses that are signatories donate 1% of their annual turnover to an environmental charity. Read more here.
Anthropocene era	A new geological Age, defined by the impact of human activity. There has been much debate as to whether we have entered such an era already, moving on from the Holocene, due to our negative impact on the planet's climate and natural resources.
B Corp	Certified B Corporations, or B Corps, are companies verified by B Lab to meet high standards of social and environmental performance, transparency, and accountability. Read more here.
Biodegradable	A material which breaks down organically over a period of time, as microorganisms such as bacteria or fungi break it down into naturally-occurring gases and biomass. The term does not mean the material should be freely released into the environment in an uncontrolled manner, as the speed, method and nature of biodegradation differs between materials. See 'compostable too'
Biofuel	A fuel derived from renewable, biological sources, including crops such as maize and sugar cane, and some forms of waste.
Carbon budget	A carbon budget is the maximum amount of cumulative global carbon dioxide (CO2) emissions that would result in limiting global warming to a given level with a given probability, taking into account the effect of other anthropogenic climate forcers
Carbon capture and storage	The collection and transport of concentrated carbon dioxide gas from large emission sources, such as power plants. The gases are then injected into deep underground reservoirs. Carbon capture is sometimes referred to as geological sequestration.
Carbon footprint	The total amount of greenhouse gas emissions released into the atmosphere that is produced directly or indirectly by human activities. It can be calculated to measure the emissions emitted by products, services, individuals, companies or nations. The standard unit of measurement for carbon footprints is carbon dioxide equivalents (CO2e).
Carbon Literacy	Carbon Literacy® is 'an awareness of the carbon costs and impacts of everyday

	activities and the ability and motivation to reduce emissions, on an individual, community and organisational basis.
Carbon negative	Removing more carbon dioxide from the atmosphere than you emit. *NB: Additional guidance has been issued by the Advertising Standards Authority around the use of this and other similar terms - see link.*
Carbon neutral	Striking a balance between what you emit and what you remove from the atmosphere. *NB: Additional guidance has been issued by the Advertising Standards Authority around the use of this and other similar terms - see link.*
Carbon sink	Any process, activity or mechanism that removes carbon from the atmosphere. The biggest carbon sinks are the world's oceans and forests, which absorb large amounts of carbon dioxide from the Earth's atmosphere.
Carbon transition	The structural shift of economic activity away from carbon-intensive processes (fossil fuel combustion, high-emission industrial methods) toward low- or zero-carbon alternatives, driven by climate policy, technology cost curves, and investor/regulatory pressure.
Circular economy	Aims to minimise waste and promote sustainable use of natural resources, through smarter product design, longer use, reuse and recycling. Also involves sharing, leasing, repairing and refurbishing existing materials and products as long as possible to extend the life cycle of products.
Anthropogenic climate change or 'climate change' for short	Man-made climate change - climate change caused by human activity as opposed to natural processes. The long-term shift in global weather patterns or average temperatures. Scientific research shows that, compared with climate change patterns throughout Earth's history, the rate of temperature rise during the Industrial Revolution is extremely high. Rising temperatures can lead to extreme weather such as droughts, sea level rises and retreating glaciers.
Climate Change Committee (CCC)	An independent advisory body based in the UK that advises the UK Government and devolved Governments and Parliaments on climate mitigation (reducing emissions in line with climate science) and climate adaptation. The Committee is perhaps best known for its advice on Carbon Budgets and its annual progress report to the UK Parliament on the net-zero transition.
Compostable	A material which is certified to biodegrade or decompose under industrial composting conditions. Industrial composting conditions require elevated temperature (55-60°C) combined with a high relative humidity and the presence of oxygen. See 'biodegradable' too.
COP	The United Nations Framework Convention on Climate Change's (UNFCC) supreme decision-making body. Made up of all "States Parties", it meets every year to make

	decisions to meet goals for combating climate change. Decisions can only be made unanimously by the States Parties or by consensus.
CO2e	Six greenhouse gases are limited by the Kyoto Protocol and each has a different global warming potential. The overall warming effect of this cocktail of gases is often expressed in terms of carbon dioxide equivalent - CO2e - the amount of CO2 that would cause the same amount of warming.
Corporate Social Responsibility (CSR)	A concept which encourages a company to take responsibility for its impact on environmental and social wellbeing. CSR is a broad movement which encompasses a variety of issues such as human rights, corporate governance, responsible sourcing and environmental footprints.
Cradle to Cradle	Using the end-use product (waste) for the source of a new product: a circular economy. All products can be designed for continuous recovery and re-utilisation.
Cradle to Grave	From creation to disposal; throughout the life cycle. The term is used in a number of business contexts, but most typically in a company's responsibility for dealing with hazardous waste and product performance.
Corporate Sustainability Reporting Directive (CSRD)	One of the EU's most significant social and environmental reporting directive. The regulation entered into force in January 2023 and its remit is being gradually broadened from an initial set of larger companies. CSRD is part of the European Sustainability Reporting Standards (ESRS).
Deforestation	The permanent removal of standing forests that can lead to significant levels of carbon dioxide emissions.
Double materiality	The process of analysing how climate change affects your business, but also how your business affects climate change.
Embodied carbon	All emissions related to the construction processes of a building, through its whole life cycle. Emissions from all processes associated with the materials or products used to construct, maintain, repair, refurbish and demolish a building. These emissions are distinct, not ongoing, and so cannot be removed or reduced once work has finished.
Environmental Product Declaration (EPD)	A third-party verified and registered certification that provides transparent information about a product's environmental impact throughout its lifecycle. They are prepared according to international standards and typically consider aspects such as resource consumption, emissions, waste management, and embodied carbon from its product and transportation.
Environmental, social and governance (ESG)	ESG stands for environmental, social and governance and refers to a set of standards used to measure an organisation's environmental and social impact.
Feedback loop	In a feedback loop, rising temperatures on the Earth change the environment in ways that affect the rate of warming. Feedback loops can be positive (adding to the rate of warming), or negative

	(reducing it). The melting of Arctic ice provides an example of a positive feedback process. As the ice on the surface of the Arctic Ocean melts away, there is a smaller area of white ice to reflect the Sun's heat back into space and more open, dark water to absorb it. The less ice there is, the more the water heats up, and the faster the remaining ice melts.
Fossil fuels	Natural resources, such as coal, oil and natural gas, containing hydrocarbons. These fuels are formed in the Earth over millions of years and produce carbon dioxide when burnt.
Global warming	The increase in the world's average temperature, due to the release of fossil fuels such as oil, gas and coal into the atmosphere.
Greenhouse gas (GHG)	Natural and industrial gases that trap heat from the Earth and warm the surface. The Kyoto Protocol restricts emissions of six greenhouse gases: natural (carbon dioxide, nitrous oxide, and methane) and industrial (perfluorocarbons, hydrofluorocarbons, and sulphur hexafluoride).
Greenhushing	When companies stay quiet about their climate strategies / progress.
Greenwashing	Making false or oversubstantiated claims or misleading statements about the environmental benefits of a product or practice.
Green Claims Code	
Insetting	When companies invest in carbon reduction projects within their own supply chain.
International Organisation for Standardisation (ISO)	An independent, non-governmental organisation that develops and publishes standards to ensure the quality, safety, and efficiency of products, services, and systems across industries.
IPCC	The Intergovernmental Panel on Climate Change is a scientific body established by the United Nations Environment Programme and the World Meteorological Organization. It reviews and assesses the most recent scientific, technical, and socio-economic work relevant to climate change, but does not carry out its own research. The IPCC was honoured with the 2007 Nobel Peace Prize.
Life Cycle Assessment (LCA)	A tool for businesses looking to assess the environmental impact of their products and processes. It helps companies make informed decisions about sustainability and resource efficiency.
Net zero	Net zero means no longer adding to the total amount of greenhouse gases in the atmosphere. The main way to do this is to cut greenhouse gas emissions in the first place. But not all emissions can be eliminated completely, so those that remain need to be actively removed through carbon capture or natural carbon sinks (see definitions above). *NB: Additional guidance has been issued by the Advertising Standards Authority around the use of this and other similar terms - see link.*

Offsetting	Where companies invest in environmental projects around the world as a means to offset their own emissions. Best practice states that an organisation should always reduce its emissions as far as possible before 'offsetting'as it has become very controversial in an unregulated market. A better interim practice is to use the 'contribution model'. Read more here.
Operational carbon	The emissions released from the ongoing energy usage that operates a building. Typical sources of these emissions are heating, hot water, lighting, power, air conditioning and lifts.
Paris climate agreement	A legally binding international UN treaty on climate change that came into force in Nov 2016. World leaders in nearly 200 countries across the world pledged to try to prevent global temperatures rising by more than 1.5C above those of the late 19th Century - known as "pre-industrial" levels.
Passive House	It's a sustainable method of construction (or Passivhaus in German, where the phrase originated) is a voluntary standard for energy efficiency in a building, which reduces the building's ecological footprint. It results in ultra-low energy buildings that require little energy for space heating or cooling.
Producer responsibility obligation (PRO)	A concept aimed at delivering sustainable development by making producers responsible for the end-of-life management of their products. Producer responsibility laws in the UK cover packaging, electrical and electronic equipment (EEE), batteries and end of life vehicles (ELVs). The regulations require businesses to minimise waste arising from these products and promote their re-use.
Renewable energy	Energy derived from replenishable sources such as the sun (solar energy), wind (wind power), rivers (hydroelectric power), hot springs (geothermal energy), tides (tidal power), and biomass (biofuels)
Scope 1	Direct emissions: Emissions that are directly within a company's control, including manufacturing products, the creation of waste and fuelling company vehicles and equipment.
Scope 2	Indirect emissions from purchased energy: These emissions are generated from electricity, natural gas, HVAC, refrigeration and other energy consumption needs.
Scope 3	Scope 3 emissions are indirect greenhouse gas emissions that occur in a company's value chain, both upstream and downstream, but not from sources the company owns or directly controls. They include emissions from purchased goods and services, business travel, employee commuting, use of sold products, waste disposal, transportation and distribution (not owned by the company) They're typically the largest share of a company's total carbon footprint - often

	more than 70%.
Science-based targets	A carbon reduction target that is in line with the scale of reductions required to keep global temperature increase below 2°C above pre-industrial temperatures.
The Sustainable Development Goals - STDGs	A UN document which features 17 sustainability goals and 169 smaller targets, including pledges to protect the world's oceans, improve water management and the energy system and take urgent action on climate change. The overarching aim of the document is to 'end poverty'. Delegates from 194 member states adopted the agreement in September 2015.
Tipping point	A critical threshold beyond which a system reorganises, often abruptly and/or irreversibly. • Abrupt ≠ fast. The threshold-crossing can be abrupt in system terms while the actual physical change plays out over decades or even centuries (Greenland ice sheet loss is the standard example). • Cascade risk. Tipping points aren't necessarily independent - crossing one can increase the likelihood of triggering others, which is the basis for concern about compounding, non-linear risk rather than isolated regional effects. IPCC, AR6, 2021
Upcycling	The process of making adaptations to used items so as to increase their value, practical benefits and/or perceived beauty. Upcycling is also known as creative reuse and is seen by some as the opposite of traditional recycling. Industrial upcycling describes the use of technologies to reduce waste and resource consumption by creating a high-value product from waste or byproduct streams.

If you come across a term that we have used that you don't understand or can't find it on this list, please email **malin.cunningham@wearehattrick.com** for clarification.

The Anti-Greenwash Charter

Campaign Review Report 2026.

Signatory: Hattrick
Review date: 03/09/2026

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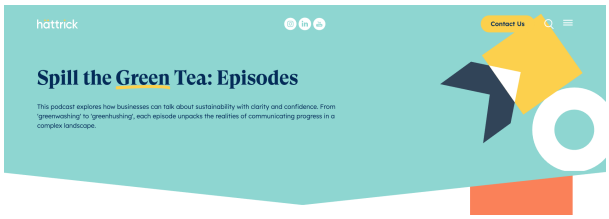
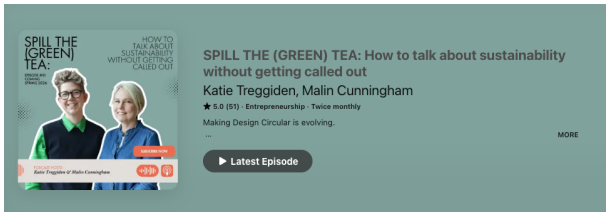
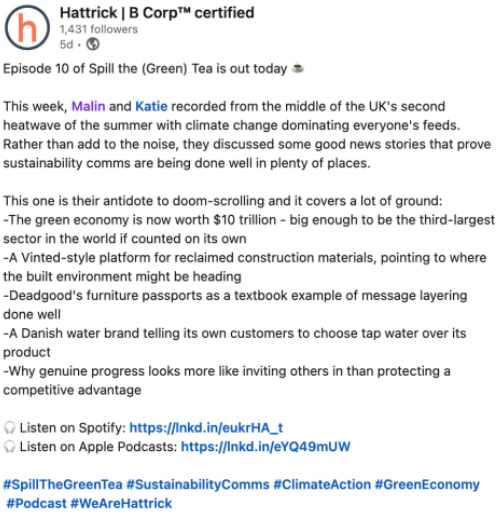
Signatory and Campaign Details







Signatory	We Are Hattrick Ltd
Campaign title	Spill the (Green) Tea podcast
Campaign type	Podcast series + accompanying LinkedIn and Instagram content
Publication date	1 February 2026 (campaign launch); evidence reviewed covers Episodes 6–10 social content
Primary link	https://www.wearehattrick.com/thought-leadership/spill-the-green-tea-podcast-episodes
Green Claims Policy reviewed	https://www.wearehattrick.com/uploads/images/Hattrick-Green-Claims-Policy-July-2026_2026-07-21-100445_lilq.pdf
Review date	03/09/2026

Review Outcome: Compliant

The campaign aligns with the practices and procedures set out in Hattrick's Green Claims Policy. Terminology used across the reviewed social content is consistent with Hattrick's Green Terms Glossary, and the organisational claims it carries (B Corp certification, verified independently via B Lab's own directory) are correctly documented in the GCP's Verified Claims Database.

Two things go beyond baseline compliance and are worth highlighting. First, Hattrick has built and accredited its own training courses: three full day 'Net Zero Masterclasses' accredited by the Carbon Literacy Project and a dedicated Greenwashing training course accredited by the CPD. The agency also makes the latter available to other Charter signatories, considerably exceeding the induction/ refresher minimum in the GCP. Second, the evidence submitted shows a real, dated example of a claim being challenged and independently checked before publication: Malin questioned a fact in draft show notes, Katie used an AI research tool to verify it, and the disputed line was cut before either the show notes or the social post went out. That AI output itself was never published; it informed an internal decision, which is a stronger outcome than the GCP's "AI content reviewed before publication" wording strictly requires.

A number of recommendations are set out below, mostly concerning how existing practice is evidenced rather than gaps in the practice itself, plus one specific written commitment (the Certified Signatory Declaration on relevant campaigns) that isn't currently being met on this campaign's own assets. No issues have been identified that require immediate corrective action.

1. Claims and Terminology Alignment

Policy requirement	Sustainability terminology must be defined in the Green Terms Glossary; claims must be documented in the Verified Claims Database
Signatory response	Yes – terms defined in Glossary; claims documented in GCP
Section status	**Met**

Term / phrase used in campaign	Defined in Glossary?	Consistent use?
Greenwashing / Greenhushing	Yes	Yes – Episodes 7, 8, 10 content
Net zero	Yes	Yes – used as a communications topic, not a first-party claim
Circular economy / circular design	Yes	Yes – Episode 7 (Dean Connell) content
B Corp	Yes	Yes – LinkedIn profile branding; matches Verified Claims Database entry and independently confirmed live on B Lab's directory
"$10 trillion" green economy / "third-largest sector" (Episode 10 post)	Not a Glossary term; a statistic	Used without a citation
"Green economy" (Episode 10 post)	No	Used descriptively; not a Glossary headword

Observation: two items in the Episode 10 post are not directly traceable to the Glossary or a source: the "$10 trillion" / "third-largest sector" figure carries no citation, and "green economy" itself is not a defined Glossary term (unlike "circular economy," which is). This is commentary on a guest-sourced good-news round-up rather than a first-party claim about Hattrick's own products or services, so it doesn't raise a compliance concern for this review, but a footnote or source link would bring it into line with the Accountability standard and with how the Napier-style citations are handled elsewhere in Charter reporting.

Observation on prohibited terms: Hattrick's GCP does not set out a distinct list of terms restricted without specific evidence (unlike some signatories' policies); it instead flags "carbon neutral" and "carbon negative" in the Glossary with a note that the ASA has issued additional guidance on their use. None of the reviewed content uses "carbon neutral," "carbon negative," "climate positive" or "zero carbon" in any form, so this is a documentation point rather than a finding against the campaign.

Assessment: terminology is consistent with the Glossary throughout the reviewed content, and no restricted terms are used.

2. Evidence of Third-Party Verification Processes

Policy requirement	Claims should be documented in the Verified Claims Database, with third-party verifiers referenced
Signatory response	Yes – claims documented within Verified Claims Database
Section status	**Met**

Verification route referenced in campaign	Matching GCP commitment	Independently checked?
"Hattrick | B Corp™ certified" (LinkedIn branding on all posts)	Verified Claims Database entry, verifier: B Corp	Confirmed live on B Lab's directory: We Are Hattrick Ltd, Certified B Corporation, score 85.8
Carbon Literacy certification (referenced as evidence for Section 5)	Verified Claims Database entry, verifier: The Carbon Literacy Project	Confirmed for Malin Cunningham via uploaded certificate (see Section 5)

Assessment: the campaign does not make product-specific environmental claims requiring independent certification; the organisational claim it does carry (B Corp status) is correctly documented and independently verifiable.

3. Use of Imagery and Visual Representation

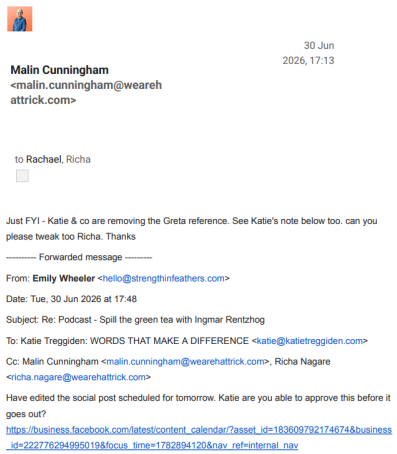
Policy requirement	Colour selection made primarily with brand guidelines (Hattrick's own or the client's) in mind; authentic, non-stock imagery from real initiatives; avoidance of generic sustainability imagery (hands around the earth, plants, nature/greenery)
Signatory response	No – form indicates visual materials were not formally reviewed against the GCP for this campaign
Evidence submitted	None at submission; clarification supplied separately
Section status	**Met**

The form answered "No" to whether visual materials had been formally reviewed. The signatory has since clarified the reasoning in two stages. First, the podcast's palette sits outside either party's brand guidelines applied individually, because the podcast brings two separate businesses together (Hattrick and Katie Treggiden), so the palette was necessarily a negotiated compromise between two existing brand identities rather than a straightforward pull from one set of guidelines. Second, within that compromise, the muted sage green/grey was specifically assessed and agreed as appropriate given the podcast's subject matter, sustainability communications, on the basis that it would help visually signal the topic.

Read this way, the choice is still guideline-led in spirit and consistent with Hattrick's actual GCP wording (colour selection "primarily with our brand guidelines / the client brand guidelines in mind"), just adapted for a joint venture where two sets of guidelines had to be reconciled rather than one applied directly. The topic-relevance check was then applied as a secondary, and appropriate, layer on top, consistent with the GCP's broader "Avoidance of Greenwashing through Colours" principle, given the genuine sustainability-comms subject matter. The imagery itself (host and guest portrait photography) remains genuine and Hattrick's own, and none of the generic sustainability imagery the GCP says to avoid is used.

Assessment: the reasoning behind the palette choice is sound and aligns with the GCP once both stages are accounted for. It wasn't captured as evidence at the point of decision, hence the "No" on the form. A brief documented note at the time, covering both the brand-reconciliation step and the topic-relevance check, would let this be evidenced directly in future rather than explained retrospectively.

4. Editorial Review and Approval Processes



30 Jun 2026, 17:13

Malin Cunningham <malin.cunningham@weareh attrick.com>

to Rachael, Richa

Just FYI - Katie & co are removing the Greta reference. See Katie's note below too. can you please tweak too Richa. Thanks

---------- Forwarded message ---------

From: **Emily Wheeler** <hello@strengthinfeathers.com>

Date: Tue, 30 Jun 2026 at 17:48

Subject: Re: Podcast - Spill the green tea with Ingmar Rentzhog

To: Katie Treggiden: WORDS THAT MAKE A DIFFERENCE <katie@katietreggiden.com>

Cc: Malin Cunningham <malin.cunningham@wearehattrick.com>, Richa Nagare <richa.nagare@wearehattrick.com>

Have edited the social post scheduled for tomorrow. Katie are you able to approve this before it goes out?

https://business.facebook.com/latest/content_calendar/?asset_id=183609792174674&business_id=222776294995019&focus_time=1782894120&nav_ref=internal_nav

Policy requirement	Two senior communications specialists review every piece of content and its green claims before publication, one of whom is not involved in the campaign
Signatory response	Yes – editorial process followed
Evidence submitted	Email trail re Ingmar episode (submitted identically for both this section and Section 6)
Section status	**Met**

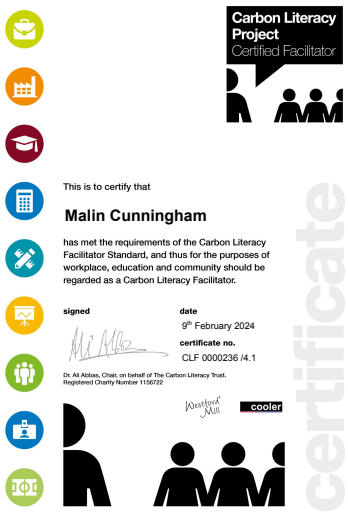
Comparing the two uploaded files against this campaign ("Email-trail-re-Ingmar-episode.pdf" and "Email-trail-re-Ingmar-episode1.pdf") confirms they are the same email trail, submitted once against editorial review and once against AI use, consistent with the signatory's own note that the file was reused because it spoke to both areas.

What the trail evidences, in sequence:

Date/time	From	Action
23 Jun, 14:57	Kirsty Spain → Emily Wheeler	Drafts Ingmar episode show notes, including the line "the man who gave Greta Thunberg her first global platform"
30 Jun, 15:50	Malin Cunningham	Queries the Greta reference: "Not convinced that's true?"
30 Jun, 15:56	Katie Treggiden	Researches the claim via an AI tool ("Here's what Google says..."), concludes: "given the last point, I feel like we should cut this line either way. Good catch Malin"
30 Jun, 15:58	Kirsty Spain	Agrees to remove the line
30 Jun, 17:13 / 17:48*	Malin Cunningham / Emily Wheeler	Malin advises Rachael and Richa the reference is being removed; Emily confirms the scheduled social post has been edited and asks Katie to approve it

Assessment: a real claim was identified, checked and corrected before publication, which is solid evidence the editorial process functions. The independent-reviewer element would be better evidenced by a visible sign-off comment from the uninvolved reviewer, rather than being inferred from being addressed on a covering email.

5. Training and Staff Awareness


Carbon Literacy Project
Certified Facilitator

This is to certify that

Malin Cunningham

has met the requirements of the Carbon Literacy Facilitator Standard, and thus for the purposes of workplace, education and community should be regarded as a Carbon Literacy Facilitator.

signed

date
9th February 2024

certificate no.
CLF 0000236 /4.1

Dr. Ali Abbas, Chair, on behalf of The Carbon Literacy Trust.
Registered Charity Number 1156722

cooler

certificate

Policy requirement	Induction training (Net Zero Masterclass, Carbon Literacy certification) for new starters; annual refresher
Signatory response	Yes – employees received training
Evidence submitted	CLF_Certificate_Malin_Cunningham.pdf; Google Drive folder link ("Hattrick Carbon Literacy Certificates")
Section status	**Met**

Assessment: training infrastructure at Hattrick is strong and exceeds the GCP minimum. For future reviews, submitting the relevant individual certificates directly (rather than a folder link) and confirming freelancer scope of work would remove reliance on narrative explanation.

6. Use of AI

On Tue, Jun 30, 2026 at 3:50 PM Malin Cunningham <malin.cunningham@wearehattrick.com> wrote:

Hi all

I've just spotted the reference to Greta Thunberg in the copy here - where did this come from? Not convinced that's true?

Thanks

Malin

On Tue, 23 Jun 2026 at 14:57, Kirsty Spain <hello@kirstyspain.com> wrote:

Hi Emily,

Here is info for the next episode of the podcast which goes live, Wed 1st July

Title: Spill the (Green) Tea with Ingmar Rentzhog

Publish date: Wed 1st July

Policy requirement	AI-generated content must be reviewed by human editors before publication; AI use disclosed where significant; regular audits
Signatory response	Yes – AI tools were used; human-reviewed
Evidence submitted	Email trail re Ingmar episode (same file as Section 4)
Section status	**Met**

The original show notes containing the disputed claim were human-drafted by Kirsty Spain; there is no evidence AI was used to generate the campaign's original copy. The AI tool was used afterwards, by Katie Treggiden, specifically to research and verify the claim once Malin had questioned it. The format of Katie's response ("Here's what Google says:", followed by a structured summary with bracketed citations [1]–[5]) is consistent with an AI-generated search summary, most likely Google's AI Overview, though the tool is not explicitly named in the evidence supplied. The GCP states AI is used "primarily to assist with brainstorming… industry and sector insights, pulling together summaries of documents," and this use, researching a factual question for editorial purposes, falls within that stated scope; there is no scope-drift concern here.

Notably, the AI output itself was never published. It was read internally, informed Katie's judgement that the line should be cut regardless of the ambiguity in the AI's own summary, and the campaign copy that went out contains no trace of the disputed claim (confirmed against the live LinkedIn post).

Assessment: this is a well-evidenced example of AI being used responsibly as an internal verification aid rather than as a drafting tool whose output required catching after the fact. The only recommendation is to name the AI tool explicitly in future evidence, and to submit distinct evidence for this section rather than reusing the Section 4 file.

7. Stakeholder Engagement and Escalation Processes

Policy requirement	Three-working-day response commitment; contact via malin.cunningham@wearehattrick.com; Certified Signatory Declaration "included for any relevant campaigns we're involved in" (GCP wording)
Signatory response	Yes – open social channels allow comments, questions and challenge
Section status	**Met**

GCP commitment	Present on wearehattrick.com (footer)?	Present on podcast episode pages / in social captions?
Certified Signatory badge	Yes – confirmed via live fetch (footer image)	No
Link to Green Claims Policy	Yes – footer link, confirmed live and matches the reviewed GCP	No
Three-working-day response commitment / contact details	Yes	No

Assessment: the escalation mechanism is operational at the website level, but the specific commitment to carry the declaration onto relevant campaigns themselves is not yet being met for this campaign. This should move from a general recommendation to a tracked action for the next review.

Recommendations for Future Campaigns

None require immediate corrective action.

1. Capture a brief, contemporaneous note when imagery and colour choices are discussed, referencing the specific GCP test (brand guidelines) being applied, rather than explaining the reasoning retrospectively.
2. Name the specific AI tool used (e.g. "Google AI Overview") directly in evidence, rather than leaving it inferable from formatting.
3. Submit distinct evidence for each Evidence Framework area rather than reusing the same file across sections.
4. For editorial review evidence, include the independent (uninvolved) reviewer's own sign-off comment directly in the trail, rather than relying on their being addressed on a covering email.
5. Add a source or footnote to statistical claims used in commentary-style social content (e.g. the "$10 trillion green economy" figure).
6. Add the Certified Signatory Declaration, or a link to it, on podcast episode notes, and a shortened version in social captions, to meet the GCP's specific commitment to include it on relevant campaigns.

Summary of Section Findings

Evidence Framework Section	Status
Claims and Terminology Alignment	**Met**
Third-Party Verification Processes	**Met**
Use of Imagery and Visual Representation	**Met**
Editorial Review and Approval Processes	**Met**
Training and Staff Awareness	**Met**
Use of AI	**Met**
Stakeholder Engagement and Escalation	**Met**

Declaration

This review was conducted against the evidence submitted by the signatory, the Green Claims Policy as published at wearehattrick.com (updated 21 July 2026), and the Green Terms Glossary contained within it, at the review date. Live pages referenced in the campaign, and the B Corp verification claim, were checked directly as part of this review.

The review assesses process implementation and governance, and confirms consistency between the terminology used in the campaign and the definitions documented in the signatory's GCP and Glossary. It does not independently verify the scientific validity of sustainability claims or the accuracy of environmental performance data referenced in the campaign.

Review Outcome: Compliant