



Third Party Code guidance: Human Rights

Introduction

In this new era of epidemic and pandemic risk, CEPI's mission—to accelerate the development of vaccines and other biologic countermeasures against epidemic and pandemic threats so they can be accessible to all people in need—is more important than ever before. Our ambitious goal, to develop vaccines against a novel viral threat in as little as 100 days, could give the world a fighting shot at stopping the next pandemic in its tracks.

CEPI requires all Third Parties (including (i) individuals, organisations and companies that provide or are intending to provide goods or services, (ii) Awardees receiving funding, and (iii) other business partners of CEPI to abide by CEPI's Third Party Code (TP Code), which can be found on www.cepi.net.

Recognising CEPI engages with organisations across different jurisdictions, each subject to distinct legislation and at varying maturity levels of their compliance frameworks, CEPI has produced some guidance which may be helpful for some Third Parties. This guidance is not intended to replace the need for independent review and assessment by our Third Parties of their own compliance framework and their adequacy. This guidance is not legal advice.



What are human rights, and why are they important?

Human rights are the fundamental rights and freedoms that every person is entitled to, regardless of their race, gender, nationality, or other status. They are based on principles of dignity, fairness, and equality and include the right to life, liberty, freedom from torture, and freedom of opinion and expression. These rights are universal, inherent, and protected by international and domestic laws, which oblige governments to uphold them.

At CEPI we oppose violations of human rights and indecent working conditions, and we expect our Third Parties to act in a way that is consistent with this. We are committed to preventing and mitigating the risks of human right violations and indecent working conditions in or linked to our operations, including through our supply chain and business partners. We strive to continuously improve our practices to respect and promote human rights and decent working conditions.

What types of rightsholders may be impacted on CEPI-funded projects?

There are a wide range of stakeholders and rightsholders that may be impacted by CEPI-funded projects.

When considering your human rights programme, you may want to consider:

- Employees and contractors within your organisation
- Individuals working at any sub-Awardees
- Individuals involved in the sourcing of raw materials
- Clinical trial participants (if relevant to the nature of the project)
- Communities where research is taking place
- End user of vaccines or other outputs of the project

When implementing the human rights requirements in the TP Code, we encourage you to think broadly about who may be affected by your activities, including those who may be more vulnerable due to their role, location, or circumstances.

Key human rights requirements in the Third Party Code

The Third Party Code sets out clear minimum standards, including requirements related to:

- prohibition of forced labour, modern slavery, and human trafficking;
- prohibition of child labour and protection of young workers;
- non-discrimination, equal opportunity, and fair treatment;
- freedom from harassment, abuse, and inhumane treatment;
- freedom of association and respect for workers' rights; and
- safe, lawful, and dignified working conditions.

Third Parties must not violate these rights and are required to notify CEPI promptly if they become aware of any actual or potential human rights violations connected to CEPI-funded activities.

How to embed human rights in practice (good practice examples)?

CEPI recognises that Third Parties vary in size, maturity, and risk profile. There is no “one-size-fits-all” approach. However, effective human rights programmes often include the following elements:

- **Clear commitment and policies**
 - Publicly commit to respecting international human rights standards.
 - Integrate human rights expectations into existing policies (e.g. Code of Conduct, HR policies, supplier standards).
- **Risk-based assessment**
 - Identify where actual and potential human rights impacts are most likely to arise in your operations or value chain. This should identify impacts that are caused, contributed to, or directly linked to the organisation’s activities.
 - Pay particular attention to higher-risk contexts, such as fragile settings, complex supply chains, or research involving human subjects.
- **Preventative controls and process**
 - Implement fair recruitment and employment practices.
 - Ensure that harassment, discrimination and abuse are actively prevented and addressed.
 - Implement appropriate due diligence and screening over third parties.
 - Set clear expectations for subcontractors and suppliers.
- **Training and awareness**
 - Provide appropriate training or guidance to staff and relevant partners so they understand human rights risks and their responsibilities.
- **Reporting and remediation**
 - Maintain accessible and safe channels for workers and others to raise concerns without fear of retaliation.
 - Take appropriate action to investigate and address issues when they arise, including informing and cooperating with CEPI where required.

These measures should be proportionate to your size, role, and risk exposure, and embedded into existing governance and operational processes wherever possible.

Help and support

There are a number of ways in which CEPI may be able to provide support and guidance to our Third Parties who are looking to strengthen their own compliance programme to effectively address the third party risk on CEPI-funded projects.

- A number of elements of CEPI's own compliance programme are published in the Document Repository on www.cepi.net, and may be helpful as a reference. In addition, CEPI has a guidance document on the TP Hub on a Positive working environment, which includes guidance on avoidance of harassment and bullying.
- CEPI may provide training for some Awardees where appropriate. However, if you feel that your teams would benefit from business integrity training (including coverage of Human Rights), please get in touch.
- CEPI's electronic Whistleblowing channel is available on www.cepi.net, and any concerns or allegations in relation to our projects may be reported through that channel, regardless of the nature of the individual reporting the issue. Please see *Speaking Up* below for further information.
- CEPI conducts audits over some of our Third Parties; any findings from these may be shared with you to highlight key areas for further development.

Key sources for further information

Several specialist organisations and resources can support the development of a human rights programme, or specific elements of one. Examples include:

- OHCHR (UN Office of the High Commissioner for Human Rights), including the United Nation's Guiding Principles on Business and Human Rights, a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations:
https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf
- International Labour Organization, dedicated to promoting social justice and internationally recognized human and labour rights: <https://www.ilo.org/>
- Danish Institute for Human Rights, Denmark's national human rights institution, working to promote and protect rights both at home and abroad:
<https://www.humanrights.dk/>
- Unseen, a UK-based charity and social enterprise dedicated to ending modern slavery and trafficking: <https://www.unseenuk.org/>
- Ethical Trading Initiative, an alliance of businesses, NGOs and trade unions working together to advance human rights in global supply chains:
<https://www.ethicaltrade.org/>
- Protect; a UK whistleblowing charity aiming to stop harm by encouraging safe whistleblowing: <https://protect-advice.org.uk/>

- Business and Human Rights Centre, a global organisation working at the intersection of business and human rights: <https://www.business-humanrights.org/>

Please reach out to your CEPI contact, or to compliance@cepi.net

Speaking up

CEPI prioritizes the prevention of misconduct and promotes a culture of openness and transparency. All Third Parties and other individuals are encouraged to report to CEPI concerns of non-compliance with the TP Code. If you have concerns regarding breaches of this TP Code, please report such breaches immediately to CEPI. We rely on you to help make sure that CEPI is aware of and can correct any issues that may not be in line with our ethical standards.

Where possible, you can report to your contact person within CEPI. You may also report to CEPI management if necessary.

CEPI has also selected a trusted external and independent third party specialized in compliance reports, with whom the whistleblower may communicate freely through the following [electronic channel](#). The channel also offers anonymous reporting options.

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