

POLICY

As a VVB (under ISO 17029 & 14065 accreditation) Carbon Check is committed to assess projects or inventories based on the compliance to the requirements articulated by the decisions of the ANAB/NABCB to the ISO 14065 and applicable GHG scheme requirements; methodologies, tools.

Towards that end the pricing policy of Carbon Check will take into account the following factors:

- a) Type of project/organization- technology measure employed, single/bundled/PoA
- b) Number of sites
- c) Size of the project – small scale/large scale or scope (1,2 & 3) involved for the GHG inventory
- d) Geographical location of sites
- e) Tools & methodologies rates of our assessors which are in vogue from time to time

The time required to complete a validation/verification will depend on:

- a) Our available resources (FM7.7)
- b) Work in hand
- c) Complexity of project
- d) Availability of information/documents/evidence required to validate/verify any project.

Factors such as consultancy organization used or financial organization used for a project function will not play any role in matters of time, price, simplicity/complexity of validation/verification.

1. PURPOSE

To ensure that impartiality is managed with respect to all validations and verifications carried out by Carbon Check.

The role of the Impartiality panel in the process is to provide independent oversight.

The management of Carbon Check is responsible for implementing the impartiality process.

2. SCOPE

Impartiality management relates to two levels:

- A. Organisational impartiality management (i.e those impartiality threats that apply to Carbon Check as an organisation) – where this procedure and FM6.1 are utilized.
- B. Project specific impartiality management – (i.e those impartiality threats that are specific to projects) - where this procedure and FM4.2 are utilized, in conjunction with the application review process, Proc 3.0.

This process applies to all validation and verification assessments and to all risks to impartiality which might include the following:

- a) Source of revenue: risks from a client paying for the validation or verification of greenhouse gas (GHG) assertions;
- b) Self-interest: risks from a person or body acting in their own interest, for example financial self-interest;
- c) Self-review: risks from a person or body reviewing their own work; assessing validation or verification activities of a client to whom the validation body or verification body provided consultancy would be a self-review risk;
- d) Familiarity (or trust): a risk from a person or body being too familiar or trusting of another person instead of seeking validation or verification evidence is a familiarity risk;
- e) Intimidation: risks from a person or body having a perception of being coerced openly or secretly, such as a risk to be replaced or reported to a supervisor.

3. PROCESS OWNER / OVERALL RESPONSIBILITY AND AUTHORITY

The CEO and Compliance officer has overall responsibility and authority for ensuring that this procedure is implemented.

4. PROCESS / PROCEDURE

4.1 Process Inputs

Inputs	Source	Acceptance Criteria
Application forms	Application and Planning Process Proc 3.0	Application form reviewed as per Proc 3.0
Impartiality threats	As above	Refer to FM 6.1 for guidance on risk acceptability

4.2 Process Flow

Not currently applicable to this procedure - refer to section 4.4 for the process/procedure steps.

4.3 Process Outputs

Outputs	Destination/s	Acceptance Criteria
Impartiality risk assessment	Carbon Check Management and public domain	Impartiality risk assessment completed in full
Managed impartiality threats	Client, ANAB/NABCB and applicable GHG scheme requirements	Impartiality threats either removed or managed. If not possible - work not carried out by Carbon Check.

4.4 Process/Procedure Steps

Step	Activity	Responsibility & Authority
1	<p>Commitment to impartiality</p> <ul style="list-style-type: none"> - Include the top management commitment to impartiality in the Carbon Check quality policy. - Communicate this and ensure it remains publicly available i.e. on the Carbon Check website. - Ensure the impartiality requirements are included in contracts (internal and external assessors and validation or verification role players, as per FM 7.4a and 7.4b. Refer to Proc 7.0) <p>While carrying out the conflict-of-interest analysis the following risks, but not limited to them, shall be included:</p> <ul style="list-style-type: none"> (a) Source of revenue: risks from a client paying for the validation or verification/certification work. This risk is significant when Carbon Check has numerous contracts with the same client; (b) Self-interest: risks from a person or an organization acting in its own interest, for example financial self-interest; (c) Self-review: risks from a person or an organization reviewing its own work; assessing the CDM validation or verification/certification activities of a client to whom the Carbon Check or its related bodies provided consultancy would be a self-review risk. E.g. use of same person in the V/V team and as technical reviewer, in case of small scale project use of same V/V personnel for the validation as well as verification ; (d) Familiarity (or trust): risks from a person or an organization being too familiar or trusting of another person instead of seeking validation or verification/certification 	Top Management

Step	Activity	Responsibility & Authority
	<p>evidence is a familiarity risk. E.g. use of same V/V personnel for number of verification of the same project with the client ; and (e) Intimidation: risks from a person or an organization having a perception of being coerced openly or secretly, such as a risk to be replaced or reported to a supervisor.</p> <ul style="list-style-type: none"> - While carrying out the conflict-of-interest analysis, Carbon Check shall: <ul style="list-style-type: none"> - Evaluate sources of income and assess whether financial or other commercial factors do not compromise impartiality; - Identify and document its actual/proposed involvement in project activities other than validation and/or verification/certification and carry out and document analysis of actual and potential risk to impartiality; - Identify and document all related bodies and identify actual/potential risks to impartiality, including potential conflicts arising from any such relationships; - Disclose and document, in a transparent and comprehensive manner the following information, as a minimum: the types of activities carried out by Carbon Check, its parent organization, entities belonging to the same group, related bodies, personnel and subcontractors in general and in particular regarding the Project Activity, including development, financing, consultation and training; and - Clearly define the functions of its related bodies and their relationships with the Carbon Check when describing its organizational structure. This should cover all relationships, such as: <ul style="list-style-type: none"> (i) Relationships based on common ownership and governance, personnel; (ii) Shared resources, finances, and contracts; and (iii) Marketing and payment of commission or other inducement for bringing in business or the referral of new clients, etc. 	
2	<p>Constitute Impartiality Panel / Oversight of impartiality</p> <ul style="list-style-type: none"> - Ensure that an Impartiality Panel is maintained for managing Impartiality. - Compile a Terms of Reference for the Panel that includes the role and authorities. - Refer to FM 6.2 Impartiality Panel Terms of Reference and Procedures. - Retain records of the panel members' acceptance of nomination, using FM6.3, signed non-disclosure circumvention agreements, FM7.6, copies of CVs and that the members represent the stakeholders as identified in FM6.2. - Ensure that the Impartiality Panel functions in accordance with the Terms of Reference FM 6.2 Impartiality Panel Terms of Reference and Procedures. - Ensure that the recommendations regarding impartiality management are either implemented or reviewed in accordance with the Terms of Reference FM 6.2. - Ensure records of Impartiality Panel meetings are retained. 	CEO and Compliance officer



Step	Activity	Responsibility & Authority
3	<p>Determine the risks to impartiality and associated mitigation measures- Organizational</p> <ul style="list-style-type: none"> - Use the Risk Assessment form FM 6.1 to determine the risks and mitigation measures. - Conduct at least one risk/impartiality review for the whole organization per year, or more often, at any time if there are concerns or threats noted. - Ensure the Impartiality Panel reviews and ratifies the risk assessment, FM6.1. <p>The mitigation actions may be through, inter alia:</p> <ul style="list-style-type: none"> (a) Prohibitions – Certain defined activities should not be carried out; (b) Restrictions – Certain defined activities should be carried out in a restricted manner with clearly defined control points to ensure mitigation; and (c) Disclosures. <p>The mitigation strategies and actions whenever a change in the conflict of interest analysis has occurred.</p>	CEO, Compliance Officer, with reference to Impartiality Panel
4	<p>Determine the risks to impartiality - Project Specific</p> <ul style="list-style-type: none"> - Use the same principles, but conduct the risk assessment as part of the Application and Planning process Proc 3.0, and log the outcomes using FM 4.2. All risks to impartiality shall be categorized as either high or medium or low. - If any risks are identified that require mitigatory measures, a mitigation plan shall be defined as per the procedure and associative form. Identified risks are to be referred to the Impartiality Panel for review at the next meeting, or if urgent, distribute to the Panel members for electronic decision; or call an emergency meeting. - Determination of Impartiality risk and mitigation measures shall be conducted prior to the commencement of any verification or validation services. In order to avoid risk to impartiality after the commencement of verification/validation services, non-conflict of interest shall be continually assessed throughout the life time of the project and up to one year after completion. <p>Mitigation measures for threats like self interest, familiarity and intimidation:</p> <ul style="list-style-type: none"> ➤ Self Review: Not utilizing same V/V personnel for carrying out V/V process and technical review. In case a V/V team member or the entire team is involved in the validation of the SSC project, not involving the V/V team member or the entire team during the first verification of the project after registration. ➤ Familiarity (or trust): Change of team composition (including the member if applicable) after three subsequent verification of the same project. ➤ Intimidation: Not linking the project completion (particularly the nature of the opinion) to the performance indicator criteria of the V/V personnel and no financial incentive on the completion of projects. As per CCIPL policy, impartiality is one of the key criteria/consideration while carrying out V/V services, hence risk to be replaced or reported to a supervisor is being taken care. <p>Specific to ARB project activities:</p> <p>After commencement of offset verification services, Carbon Check will monitor and immediately make full disclosure, in writing, to the applicable Offset Project Registry regarding any potential for a conflict of interest situation that arises for an offset project using a Compliance Offset Protocol. This disclosure will include a description of actions that the verification body has taken or proposes to take to avoid, neutralize, or mitigate the potential for a conflict of interest.</p>	Quality Manager and Compliance officer

Step	Activity	Responsibility & Authority
	<ul style="list-style-type: none"> - Carbon Check continue to monitor arrangements or relationships that may be present for a period of one year after the completion of offset verification services for an offset project using a Compliance Offset Protocol. During that period, within 30 days of the verification body or any verification team member entering into any contract with the Offset Project Operator or Authorized Project Designee for which the verification body has provided offset verification services, Carbon Check shall notify applicable the Offset Project Registry of the contract and the nature of the work to be performed. 	
5	<p>Implement Safeguards to impartiality</p> <ul style="list-style-type: none"> - As per the mitigation measures identified during the risk assessments – <ul style="list-style-type: none"> - organisational – FM6.1 and - project specific – FM4.2 respectively. - Make provision for any anticipated validation/verification needs. 	CEO with assistance from the Compliance Officer and Quality Manager
6	<p>Avoidance of conflict of interest Carbon Check <i>shall not</i></p> <ul style="list-style-type: none"> - use personnel with an actual or potential conflict of interest; - validate and verify greenhouse gas (GHG) assertions from the same GHG project unless allowed by the applicable GHG programme; - provide any consultancy services to the responsible party that support the GHG assertion; - validate or verify a GHG assertion where a relationship with those who provided GHG consultancy services to the responsible party that support the GHG assertion poses an unacceptable risk to impartiality. <p>NOTE 1 A relationship such as that described in d) could be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing, and payment of a sales commission or other inducement for the referral of new clients.</p> <ul style="list-style-type: none"> - validate or verify a GHG assertion using personnel who were engaged by those who provided GHG consultancy services to the responsible party in support of the GHG assertion; - outsource the review and issuance of the validation or verification statement; - offer products or services that pose an unacceptable risk to impartiality; - state or imply that validation or verification of a GHG assertion would be simpler, easier, faster or less expensive if a specified GHG consultancy service were used. <p>NOTE 2 Arranging training and participating as a trainer is not considered a GHG consultancy service, provided that (where the training relates to GHG quantification, GHG data monitoring or recording, GHG information system or internal auditing services) it is confined to the provision of generic information that is freely available in the public domain (i.e. the trainer should not provide organization-specific or project-specific advice or solutions).</p> <p>Carbon Check is committed to the following</p> <ul style="list-style-type: none"> - Carbon Check shall not have any direct relationship with its client other than validation and/or verification/certification work and third party conformity assessment; - Carbon Check shall not undertake validation and/or verification/certification of a 	Compliance officer and Quality Manager

Step	Activity	Responsibility & Authority
	<p>project activity if Carbon Check or any external assessor has been engaged in any function that has been identified as a threat to impartiality, such as any of the following relating to the project activity:</p> <ul style="list-style-type: none"> (a) Identification, development and/or financing of PA ; (b) Consultancy related to PA; (c) Providing of training on PA or and other related topics; (d) Marketing and tie-up promotion with consultancy/financing organizations; (e) Offering/payment of commissions or other inducements for promotion or new business; (f) Use of personnel for validation and/or verification/certification of a project activity who were previously associated with the client in their personal capacity or otherwise for any activity such as development, consultancy, training, etc.; and (g) Other organizational considerations such as performance targets in financial terms or in terms of a specific number of PA or offset project to be validated and/or verified/certified during a period of time. (h) The conditions in Carbon Check contracts with client shall not link Carbon Check payments to the final outcome of the validation or verification/certification activities; (i) Carbon Check personnel involved in validation and/or verification/certification activities shall be bound by Carbon Check impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions for each validation and/or verification/certification activity; and (j) Carbon Check personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding a CDM project activity, any advice, consultancy or recommendation to client on how to address any deficiencies that may be identified in the validation or verification/certification. <ul style="list-style-type: none"> - Carbon Check shall not outsource validation and/or verification/certification work to a legal entity that is engaged in the development, consultancy or financing of CDM PA or offset project; - Carbon Check shall not use external validators, verifiers or technical experts in a CDM project activity if they, or the organization that employs them, have been engaged in the development, consultancy or financing of this CDM or offset project; - Carbon Check's activities shall not be marketed or offered as linked with the activities of an organization that provides services in respect of development, financial assistance and consultancy for CDM PA or offset project. - Carbon Check shall not state or imply that validation and/or verification/certification regarding a CDM or offset project would be simpler, easier, faster or less expensive if a specified consultancy/financing organization is used; - Carbon Check shall not use validation or verification/certification personnel, internal or external, in the validation or verification/certification of a CDM project 	



Step	Activity	Responsibility & Authority
	<p>activity or PoA if:</p> <p>(i) They, or the organization that employs them, have been involved in the development, consultancy or financing of this CDM project activity or PoA; or ^[1]_[SEP]</p> <p>(ii) They have had any professional relationships, other than a third party conformity assessment, with the project participants of this CDM project activity or PoA within the last two years;</p> <p>Carbon Check shall not use personnel who have been involved in, or have had a professional relationships with the client (other than a third party conformity assessment) of a CDM project activity or offset project under validation and/or verification/certification in any way within the last two years, to take part in validation and/or verification/certification work for the CDM or offset project. If the person or the organization that employs them in question was involved in the development of a CDM or offset project under validation and/or verification/certification, then Carbon Check shall not use such person at all in the validation, verification/certification of the project. Such Carbon Check shall require its personnel, internal and external, to reveal any potential conflict of interest known to them.</p> <ul style="list-style-type: none"> - Carbon Check shall not use for the verification/certification of a CDM project activity or PoA personnel who was involved in the validation team of such CDM project activity or PoA, except in the cases in which a VVB is allowed to conduct both the validation and verification/certification as per VVS of applicable GHG scheme . - Carbon Check shall use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and shall not use such personnel, internal or external, unless any potential conflict of interests has been addressed and the measures taken to address these potential conflicts have been documented and implemented. If during the course of validation and/or verification/certification, such instances are known, the concerned personnel shall be removed from those functions immediately; - Carbon Check shall require its personnel, internal and external, to report any situation of influence or pressure from client that may threaten their independence in the course of validation and/or verification/certification of CDM PA or offset project. Based on such report, Carbon Check shall take appropriate actions to ensure its independence in its validation and/or verification/certification work; - The conditions in the Carbon Check’s contracts with client shall not link the Carbon Check’s payments to the final outcome of the validation or verification/certification activities; - The Carbon Check’s personnel involved in validation and/or verification/certification activities shall be bound by Carbon Check ’s impartiality policy and act impartially in their work through contractual or employment conditions and assignment conditions for each validation and/or verification/certification activity; and 	

Step	Activity	Responsibility & Authority
	<ul style="list-style-type: none"> - Carbon Check 's personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding a offset project, any advice, consultancy or recommendation to client on how to address any deficiencies that may be identified in the validation or verification/certification. - Carbon Check and the outsourced entities to which the Carbon Check may outsource one or more functions shall not have any direct relationship with the Carbon Check's clients and the project participants of the project activities or PoAs under validation and/or verification/certification other than validation and/or verification/certification activities and third party conformity assessments; - CCIPL shall take action when it is made aware of (e.g. via a complaint or by other mean) inappropriate links with or announcements by any consultancy organization stating or implying that validation/verification would be simpler, easier, faster, or less expensive if the Carbon Check were used. The action shall include but not limited to official correspondence with the concerned consultancy organization, notice from the lawyers, juridical action (where required). 	
7	Problems/complaints regarding impartiality <ul style="list-style-type: none"> - Log all problems/complaints as per the Action/problem management process, Proc 1.1 - Report problems to the ANAB/ NABCB and applicable GHG scheme requirements where applicable 	CEO with Compliance Officer
8	Management Review <ul style="list-style-type: none"> - Include any impartiality problems/complaints in the Management Review, Proc 1.6. - Management shall review the effectiveness of impartiality management including: <ul style="list-style-type: none"> - Carbon Check shall analyze and review, at least once a year, all data and information relevant to impartiality, such as the conflict of interest analysis, the mitigation strategies and actions undertaken, any non-conformities (NCs) raised with regard to impartiality and the corrective actions implemented to correct the NCs. - Based on the data/information referred to above, Carbon Check shall carry out, once a year, an analysis of the process to safeguard impartiality and a review of its effectiveness. - The recommendations of actions resulting from the review of the process of safeguarding impartiality shall be reported to Carbon Check's top management. Carbon Check shall keep record of this review – management review minutes and any associated updates to FM6.1. 	CEO and Compliance officer
9	Carbon Check shall ensure impartiality in their operations by, <i>inter alia</i>, through: <ul style="list-style-type: none"> - Having the top management's commitment to impartiality in validation and/or verification/certification functions as evidenced through defined policies and procedures, and operation and conduct of its activities (FM 7.5 and FM 7.6); - Make publicly available a statement that describes its understanding of the importance of impartiality in validation and/or verification/certification functions, how it manages conflict of interest and how it ensures the objectivity of validation and/or verification/certification functions; - Evaluate sources of income and demonstrate that financial or other commercial factors do not compromise impartiality; - Take action to respond to any threats to its impartiality arising from the actions of other 	Compliance officer



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	<p>persons, bodies or organizations;</p> <ul style="list-style-type: none">- Require personnel, internal and external, to reveal any potential conflict of interest known to them. Carbon Check should use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and shall not use such personnel, internal or external, unless any potential conflict of interests has been addressed and the measures taken to address these potential conflicts have been documented and implemented; and- Maintain a professional environment and culture in Carbon Check that supports behavior of all personnel that is consistent with impartiality.	
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5. PROCESS METRICS

Measure	Responsibility	Frequency	Use of the data	Target
Nature of any impartiality problems/ complaints	Compliance officer	On receipt	To review whether the impartiality management process needs to be modified. To manage the specific problem or complaint	Take action within 1 week
Number of justified impartiality problems/ complaints	Compliance Officer	Annual	To review the effectiveness of the impartiality management	Zero justified impartiality complaints per year

6. REFERENCES & ASSOCIATED DOCUMENTS/SOFTWARE
6.1 Documentation References

Procedure:	Management and Financial Reviews	Proc 1.6
Procedure:	Application and Planning Process	Proc 3.0
Procedure:	Human Resources & Competence Management	Proc 7.0
Procedure:	Complaints, Appeals and Disputes	Proc 8.0
Form	Client Application Review & Planning/ Team Impartiality and Risk Review form	FM 4.2
Form	Impartiality Risk Assessment form	FM 6.1
Form	Impartiality Panel Terms of Reference and Procedures	FM 6.2
Form	Response to invitation to become member of impartiality panel	FM 6.3
Form	Employee agreement	FM 7.4
Form	Code of Conduct	FM 7.5
Form	Non-disclosure non-circumvention agreements	FM 7.6

7. Records Table

Record type/group	Responsibility	Access control/ Confidentiality	Minimum retention period	Disposal method
Impartiality risk assessment records – including FM6.1	Compliance Officer	Not confidential	1 Year	Discretionary
Impartiality Panel records, including minutes of meeting, acceptance of appointments	Quality Manager	Confidential	1 Year	Discretionary
Records of project impartiality review – FM4.2	As per Proc3.0			
Problems/complaints regarding impartiality	As per Proc 1.1			



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8. Revision History

Rev Date	Rev. No.	Brief Details of Changes
Sep 2020	0	New document
March 2022	01	Revision due to the adoption of ISO 17029 & for the application under ANAB
August 2022	02	Revision due to ANAB's document review comment
October 2022	03	Changes due to Concern No. 4 issued in SA and SE Audit by NABCB