



# Paris Agreement Credit Mechanism (PACM) herein after referred as Article 6.4

### 1.1 POLICY

As a DOE (under UNFCCC CDM and Article 6.4 accreditation) and Verification body Carbon Check is committed to assess projects based only on the compliance to the requirements articulated by the decisions of the UNFCCC; methodologies, tools and guidelines stipulated by the CDM EB and Article 6.4 SBM.

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

- a) Type of project- technology measure employed, single/bundled/PoA
- b) Number of sites
- c) Size of the project – small scale/large scale
- 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 organisation used or financial organisation 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 committee 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

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**Carbon**  
— CHECK —

**IMPARTIALITY MANAGEMENT  
PROCEDURE**

CARBON CHECK  
MANAGEMENT SYSTEM –  
CMS

replaced or reported to a supervisor.

**3. PROCESS OWNER / OVERALL RESPONSIBILITY AND AUTHORITY**

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

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#### 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, UNFCCC                            | Impartiality threats either removed or managed.<br>If not possible - work not carried out by Carbon Check. |

##### 4.4 Process/Procedure Steps

| Step | Activity   | Responsibility & Authority |
|------|--|----------------------------|
| 1    | <p><b>Commitment to impartiality</b></p> <ul style="list-style-type: none"> <li>- Include the management commitment to impartiality in the Carbon Check quality policy.</li> <li>- Communicate this and ensure it remains publically available ie on the Carbon Check website.</li> <li>- 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)</li> <li>- Immediate action will be taken in response to any threats to impartiality that arise from internal or external parties, including related bodies, subcontractors, or clients. Any conflicts identified will be documented, and appropriate measures will be implemented to safeguard impartiality.</li> <li>- Foster a Culture of Impartiality: Carbon Check is committed to cultivating a professional environment where impartiality is valued and upheld by all personnel. Training, policies, and oversight are in place to ensure that all employees act in a manner that aligns with impartiality principles in their work.</li> <li>-</li> </ul> <p>While carrying out the conflict of interest analysis the following risks, but not limited to them, shall be included:</p> <p>(a) <b>Source of revenue:</b> risks from a client paying for the validation or verification/certification work. This risk is significant when Carbon Check has</p> | Management                 |

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| Step | Activity   | Responsibility & Authority                |
|------|--|---|
|      | <p>numerous contracts with the same client;</p> <ul style="list-style-type: none"> <li>- Single client (i.e.) Legal entity with whom the contract is getting signed</li> <li>(b) <b>Self-interest:</b> risks from a person or an organization acting in its own interest, for example financial self-interest;</li> <li>(c) <b>Self-review:</b> risks from a person or an organization reviewing its own work; assessing the CDM and Article 6.4 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 personel for the validation as well as verification ;</li> <li>(d) <b>Familiarity (or trust):</b> risks from a person or an organization being too familiar or trusting of another person instead of seeking validation or verification/certification evidence is a familiarity risk. E.g. use of same V/V personel for number of verification of the same project with the client ; and</li> <li>(e) <b>Intimidation:</b> 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.</li> </ul> <p>- While carrying out the conflict of interest analysis, Carbon Check shall:</p> <ul style="list-style-type: none"> <li>- Evaluate sources of income and assess whether financial or other commercial factors do not compromise impartiality;</li> <li>- Identify and document its actual/proposed involvement in CDM and Article 6.4 activities other than validation and/or verification/certification and carry out and document analysis of actual and potential risk to impartiality;</li> <li>- Identify and document all related bodies and identify actual/potential risks to impartiality, including potential conflicts arising from any such relationships;</li> <li>- 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 CDM and Article 6.4 , including development, financing, consultation and training; and</li> <li>- 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"> <li>(i) Relationships based on common ownership and governance, personnel;</li> <li>(ii) Shared resources, finances, and contracts; and</li> <li>(iii) Marketing and payment of commission or other inducement for bringing in business or the referral of new clients, etc.</li> </ul> </li> </ul> |   |
| 2    | <p><b>Constitute Impartiality Committee / Oversight of impartiality</b></p> <ul style="list-style-type: none"> <li>- Ensure that an Impartiality Committee is maintained for managing Impartiality.</li> <li>- Compile a Terms of Reference for the Committee that includes the role and authorities.</li> <li>- Refer to FM 6.2 Impartiality Committee Terms of Reference and Procedures.</li> <li>- Retain records of the committee 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.</li> </ul>  | Technical Director and Compliance officer |

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| Step | Activity  | Responsibility & Authority   |
|------|---|--|
|      | <ul style="list-style-type: none"> <li>- Ensure that the Impartiality Committee functions in accordance with the Terms of Reference FM 6.2 Impartiality Committee Terms of Reference and Procedures.</li> <li>- Ensure that the recommendations regarding impartiality management are either implemented, or reviewed in accordance with the Terms of Reference FM 6.2.</li> <li>- Ensure records of Impartiality Committee meetings are retained.               <ul style="list-style-type: none"> <li>- Ensure that an Impartiality Committee meeting is conducted at least once a year, with a mandatory requirement of 60% attendance from the panel members.</li> <li>*In cases where the impartiality committee identifies issues through the monitoring or review of the implementation of the CCIPL’s systems to safeguard impartiality, it shall report the instance to the CCIPL’s management. If the management does not follow the advice of the impartiality committee, this committee shall have the right to report the instance to the Board through the UNFCCC secretariat.</li> <li>- CCIPL should maintain the record of FM 6.4(a) Impartiality Committee: Meeting Agenda and FM 6.4(b) Impartiality Committee: Minutes of Meeting</li> </ul> </li> </ul>  |  |
| 3    | <p><b>Determine the risks to impartiality and associated mitigation measures- Organizational</b></p> <ul style="list-style-type: none"> <li>- Use the Risk Assessment form FM 6.1 to determine the risks and mitigation measures.</li> <li>- 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.</li> <li>- Ensure the Impartiality Committee reviews and ratifies the risk assessment, FM6.1.</li> </ul> <p>The mitigation actions may be through, inter alia:</p> <ul style="list-style-type: none"> <li>(a) Prohibitions – Certain defined activities should not be carried out;</li> <li>(b) Restrictions – Certain defined activities should be carried out in a restricted manner with clearly defined control points to ensure mitigation; and</li> <li>(c) Disclosures.</li> </ul> <p>The mitigation strategies and actions whenever a change in the conflict of interest analysis has occurred.</p>  | Technical Director, Compliance Officer, with reference to Impartiality Committee |
| 4    | <p><b>Determine the risks to impartiality - Project Specific</b></p> <ul style="list-style-type: none"> <li>- 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 categorised as either high or medium or low.</li> <li>- 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 Committee for review at the next meeting, or if urgent, distribute to the Committee members for electronic decision; or call an emergency meeting.</li> <li>- 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.</li> </ul> <p>Mitigation measures for threats like self interest, familiarity and intimidation:</p> <ul style="list-style-type: none"> <li>➤ <b>Self Review:</b> 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</li> </ul> | Quality Manager and Compliance officer   |

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|------|--|--|
|      | <p>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.</p> <ul style="list-style-type: none"> <li>➤ <b>Familiarity (or trust):</b> Change of team composition (including the member if applicable) after three subsequent verification of the same project.</li> <li>➤ <b>Intimidation:</b> 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.</li> </ul> <p><b>Specific to ARB project activities:</b></p> <p>After commencement of offset verification services, Carbon Check will monitor and immediately make full disclosure, in writing, to ARB or the 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> <ul style="list-style-type: none"> <li>- 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 ARB or the Offset Project Registry of the contract and the nature of the work to be performed.</li> </ul> |  |
| 5    | <p><b>Implement Safeguards to impartiality</b></p> <ul style="list-style-type: none"> <li>- As per the mitigation measures identified during the risk assessments – <ul style="list-style-type: none"> <li>- organisational – FM6.1 and</li> <li>- project specific – FM4.2 respectively.</li> </ul> </li> <li>- Make provision for any anticipated validation/verification needs.</li> </ul>  | Technical Director with assistance from the Compliance Officer and Quality Manager |
| 6    | <p><b>Avoidance of conflict of interest</b></p> <p>Carbon Check <i>shall not</i></p> <ul style="list-style-type: none"> <li>- use personnel with an actual or potential conflict of interest;</li> <li>- validate and verify greenhouse gas (GHG) assertions from the same GHG project unless allowed by the applicable GHG programme;</li> <li>- provide any consultancy services to the responsible party that support the GHG assertion;</li> <li>- 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.</li> </ul> <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"> <li>- 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</li> </ul>  | Compliance officer and Quality Manager   |

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|      | <p>assertion;</p> <ul style="list-style-type: none"> <li>- outsource the review and issuance of the validation or verification statement;</li> <li>- offer products or services that pose an unacceptable risk to impartiality;</li> <li>- 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.</li> </ul> <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"> <li>- 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 CDM and Article 6.4 projects 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 CDM and Article 6.4 projects:               <ul style="list-style-type: none"> <li>(a) Identification, development and/or financing of CDM and Article 6.4 PA ;</li> <li>(b) Consultancy related to CDM and Article 6.4 PA;</li> <li>(c) Providing of training on CDM and Article 6.4 PA or and other related topics;</li> <li>(d) Marketing and tie-up promotion with CDM and Article 6.4 or consultancy/financing organizations;</li> <li>(e) Offering/payment of commissions or other inducements for promotion or new business;</li> <li>(f) Use of personnel for validation and/or verification/certification of a CDM and Article 6.4 projects activity who were previously associated with the client in their personal capacity or otherwise for any activity such as development, consultancy, training, etc.; and</li> <li>(g) Other organizational considerations such as performance targets in financial terms or in terms of a specific number of CDM and Article 6.4 projects offset project to be validated and/or verified/certified during a period of time.</li> <li>(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;</li> <li>(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</li> </ul> </li> </ul> |                            |

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|      | <p>validation and/or verification/certification activity; and</p> <p>(j) Carbon Check personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding a CDM and Article 6.4 projects , any advice, consultancy or recommendation to client on how to address any deficiencies that may be identified in the validation or verification/certification.</p> <ul style="list-style-type: none"> <li>- 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 and Article 6.4 projects;</li> <li>- Carbon Check shall not use external validators, verifiers or technical experts in a CDM and Article 6.4 projects if they, or the organization that employs them, have been engaged in the development, consultancy or financing of this CDM and Article 6.4 projects</li> <li>- 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 and Article 6.4 projects.</li> <li>- Carbon Check shall not state or imply that validation and/or verification/certification regarding a CDM and Article 6.4 projects would be simpler, easier, faster or less expensive if a specified consultancy/financing organization is used;</li> <li>- Carbon Check shall not use validation or verification/certification personnel, internal or external, in the validation or verification/certification of a CDM and Article 6.4 projects if: <ul style="list-style-type: none"> <li>(i) They, or the organization that employs them, have been involved in the development, consultancy or financing of this CDM and Article 6.4 projects ; or</li> <li>(ii) They have had any professional relationships, other than a third party conformity assessment, with the project participants of this CDM and Article 6.4 projects activity or PoA within the last two years;</li> </ul> <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 and Article 6.4 projects 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 and Article 6.4 projects If the person or the organization that employs them in question was involved in the development of a CDM and Article 6.4 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> </li> <li>- Carbon Check shall not use for the verification/certification of a CDM and Article 6.4 projects personnel who was involved in the validation team of such CDM and Article 6.4 projects, except in the cases in which a DOE is allowed to conduct both the validation and verification/certification as per CDM and Article 6.4 AS and VVS.</li> </ul> |                            |

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|      | <ul style="list-style-type: none"> <li>- 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;</li> <li>- 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 and Article 6.4 projects. Based on such report, Carbon Check shall take appropriate actions to ensure its independence in its validation and/or verification/certification work;</li> <li>- 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;</li> <li>- 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</li> <li>- Carbon Check ’s personnel involved in validation and/or verification/certification activities shall not provide, while making validation or verification/certification regarding a CDM and Article 6.4 projects, any advice, consultancy or recommendation to client on how to address any deficiencies that may be identified in the validation or verification/certification.</li> <li>- 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 CDM and Article 6.4 projects under validation and/or verification/certification other than validation and/or verification/certification activities and third party conformity assessments;</li> </ul> |  |
| 7    | <p><b>Problems/complaints regarding impartiality</b></p> <ul style="list-style-type: none"> <li>- Log all problems/complaints as per the Action/problem management process, Proc 1.1</li> <li>- Report problems to the UNFCCC or ARB where applicable</li> </ul>  | Technical Director with Compliance Officer                 |
| 8    | <p><b>Management Review</b></p> <ul style="list-style-type: none"> <li>- 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"> <li>- Carbon Check shall analyse 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.</li> <li>- 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</li> </ul> </li> </ul>   | Technical Director, Quality Manager and Compliance officer |

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|      | effectiveness.<br>- The recommendations of actions resulting from the review of the process of safeguarding impartiality shall be reported to Carbon Check’s management as part of MRM input mentioned in Proc 1.6 (clause 3.1) and shall maintain the record of same. Carbon Check shall keep record of this review –management review minutes and any associated updates to FM6.1  |                            |
| 9    | <b>Carbon Check shall ensure impartiality in their operations by, <i>inter alia</i>, through:</b><br>- Having the 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);<br>- 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;<br>- Evaluate sources of income and demonstrate that financial or other commercial factors do not compromise impartiality;<br>- Take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations;<br>- 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<br>- Maintain a professional environment and culture in Carbon Check that supports behaviour of all personnel that is consistent with impartiality. | Compliance officer         |

## 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.<br>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  
 Procedure: Application and Planning Process

Proc 1.6  
 Proc 3.0

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| 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       | Impartiality committee: Meeting agenda                                       | FM 6.4 (a) |
| Form       | Impartiality committee: Minutes of Meeting                                   | FM 6.4 (b) |
| 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    |                                 |                          |                 |

### 8. Revision History

| Rev Date     | Rev. No. | Brief Details of Changes  |
|--------------|----------|---|
| Aug 2009     | 0        | New document  |
| Jan 2010     | 1        | Added reference to as per FM 7.4 and 7.5 to Step 1<br>Added Step 9, to clarify Carbon Check's intention with regard to impartiality management<br>Amended 5. Process Metric to reflect target of zero justified imparity complaints.<br>Added cross references to Proc 8.0<br>Clarified the frequency of impartiality reviews<br>Added reference to new procedure, Proc 1.6<br>Step 2 : Added reference to FM 4.2 for project impartiality review recording |
| October 2010 | 2        | Created and included reference to a separate Impartiality Committee Terms of Reference and Procedures, FM 6.2 (previously part of FM1.11).<br>Removed references to FM 1.11<br>Added explanation of the two levels of impartiality management to the Scope.<br>Added detail to step 2, 3, 4 and 5.<br>Updated Records Table.  |

| Revision Date | Rev. No | Title                                    | Approved by: (Signed on page 1 of Master hard copy only) | Page No. | 11 of 12        |
|---------------|---------|--|--|----------|-----------------|
| Nov 2024      | 18      | <b>Impartiality Management Procedure</b> | Sanjay Kumar Agarwalla                                   | Doc No.  | <b>Proc 6.0</b> |

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|----------------|----|--|
| Oct 2011       | 3  | Added para 166 of the CDM Accreditation Std version 3 under point 6  |
| March 2012     | 4  | Added types of risks – step 1.<br>Added records of signed non-disclosure circumvention agreements, FM7.6, copies of CVs to step 2<br>Clarified mitigatory measure options in step 3.<br>Added detail of review of effectiveness of impartiality mitigations to step 8.<br>Added forms FM7.8 and FM6.3 under References (6.2) |
| June 2012      | 5  | Procedure aligned to Accreditation Standard Version 4  |
| July 2012      | 6  | Updating of authorisation and responsibility   |
| Sept 2012      | 7  | Updating responsibility from CEO to Executive director   |
| May 2013       | 8  | Inclusions for ISO 14065 and ARB requirements  |
| Nov 2014       | 09 | Reason of changes: <ul style="list-style-type: none"> <li>Transfer of Accreditation from Carbon Check (Pty) Ltd to Carbon Check (india) Privat Ltd.</li> <li>Implementaion of Accreditation Standard version 06.0</li> <li>Removal of ANSI (ISO 14065) requirements from the documents.</li> </ul>                           |
| Nov 2015       | 10 | Revised in response of NC 1 and NC 2 of Regular Surveillance   |
| Sept 2020      | 11 | Revision to update the logo of CCIPL   |
| June 2023      | 12 | Revised the document name  |
| October 2023   | 13 | Revised as per OFI raised from CDM re-accreditation audit  |
| October 2023   | 14 | Revision as per the NC raised from CDM re-accreditation audit  |
| November 2023  | 15 | Revision to reflect changes in organization structure  |
| April 2024     | 16 | Revised in response to incorporate the changes as per A6.4 accreditation standard version 01.0   |
| September 2024 | 17 | Revised based on the Article 6.4 initial accreditation desk review   |
| November 2024  | 18 | Revised in response to the fDRR comments received during the Article 6.4 accreditation application process   |

| Revision Date | Rev. No | Title                                    | Approved by: (Signed on page 1 of Master hard copy only) | Page No. | 12 of 12        |
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