

Document Topic	Date of issuance	Revision
Impartiality Management	09/01/2023	A.8
Serial Number	Author	Approved by
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1. OBJECTIVE

This procedure discusses the impartiality risk of CTI Certification and provides details of the method to safeguard impartiality related to the CTI Certification's Validation/Verification activities.

2. RESPONSIBILITY

The Governing Board is top structure with the authority to supervise impartiality issue of CTI Certification. The General Manager of CTI Certification is responsible for ensuring effective impartiality management. The Quality Monitoring Dept. Manager is responsible for executing impartiality risk analysis and impartiality related process. The New Business Operation Manager is responsible for impartiality issue of team members assigned.

3. ACTIVITIES SUBJECT TO CONTROL

The following activities or conditions are associated with this Procedure:

- Organizational relationship with interested parties, including development, financing, consultation and training
- Controlling of newly recruited personnel
- Appointment of specific validation or verification activities
- Avoiding conflict of interest of other related services such as GHG training

4. DESCRIPTION

4.1 Principles of safeguarding impartiality

4.1.1 Absolute prohibition: it is a kind of unacceptable risk to impartiality that shall be forbidden strictly, such as:

- Prohibiting verification of GHG projects that have been validated by CTI Certification unless GHG program permits;
- shall not outsource the review and issuance of the validation or verification statement;
- shall not validate or verify a GHG assertion where it provided GHG consultancy to the responsible party that support the GHG assertion;
- shall not validate or verify a GHG assertion owned by some entities having relationship of unacceptable risk to impartiality with CTI Certification;
- shall not review validation or verification decision using the same person for validation or verification;
- prohibit the designated personnel from rendering any advice, consultancy or recommendation to CDM PPs on how to address any deficiencies that may be identified in the validation or verification/certification;
- Never compromise financial pressure and shall not to contract validation or verification task which violate impartiality principles just in order to fulfill budget performance.

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4.1.2 Relatively compromising: it is a kind of acceptable level of risk to impartiality that shall be protected by an applicable procedure or process such as:

- shall not validate or verify a GHG assertion using personnel who were involved in a project activity under validation and/or verification/certification in any way, or have had relationships with the project like CDM PPs within the last two years, to take part in validation and/or verification/certification work for the project activity;
- shall not use the person who in question was involved in the development of a CDM project activity under validation and/or verification/certification;
- shall not provide GHG training to clients where concrete consulting suggestion will be released;
- handling appeal and complaint with principle of independence;
- shall not assign the same verifier to certain client more than five times.

4.2 Terms of reference of the impartiality committee

- Assist in the development of policies related to the impartiality of certification activities.
- Prevent certification bodies from having any tendency to allow commercial or other factors to prevent them from consistently providing objective certification activities.
- Advise on matters affecting the credibility of certification, including openness and public awareness.
- Conduct a review at least annually of the impartiality of the certification body's audit, certification and decision processes
- Review all information provided by the general Manager of the company on matters related to certification, including the reasons for making major decisions, actions taken, and the selection of personnel responsible for specific activities, to ensure that the certification work is fair and accurate.
- Pay close attention to the supervision activities of the certification, and timely convey the opinions of all parties related to the supervision activities of the company to the leadership of the company.
- Members of the Impartiality Committee are empowered to exercise their supervisory duties through the following activities:
 1. Attend regular and non-regular meetings of the impartiality maintenance committee;
 2. Access to the relevant certification files;
 3. Review records related to appeals, complaints and disputes.
- If the recommendations made by the Impartiality Committee are not respected by the top management of the company, the Impartiality Committee has the right to take independent measures, including reporting to the certification regulatory authorities, accreditation bodies or stakeholders. In taking independent measures, the Commission shall respect the confidentiality requirements of the client and the certification authority.
- Accept and handle the complaints lodged by the relevant parties to the Impartiality Maintenance Committee.
- Has the rights to report non compliant issues to the governing board of CTI Certification and to the UNFCCC EB

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4.3 Safeguard impartiality at CTI Certification level

CTI Certification shall ensure the principle in 4.1 to be implemented successfully.

The Governing Board will oversee impartiality performance of CTI Certification via assessing records of management review with emphasis on:

- CTI Certification’s impartiality analysis considering various relationship including ownership, governance, management, personnel, shared resources, finances, contracts, marketing, and payment of a sales commission or other inducement for the referral of new clients;
- Personnel recruitment;
- Personnel assignment for validation or verification;
- Personnel assignment for appeal or compliant handling;
- Personnel assignment for GHG training;
- Validation or verification process

According to actual status, the Quality Monitoring Dept. Manager performs analysis and review all data and information relevant to impartiality, such as the conflict of interest analysis, the mitigation strategies and actions undertaken, any non-conformities raised with regard to impartiality and the corrective actions implemented to correct the NCs related to CTI Certification once a year at least and whenever a significant change occurs in the Validation and/or Verification activities, such as changes in the organizational structure or of the legal status and mergers with or acquisitions of other organizations. The Impartiality Assessment Report will be developed and updated periodically where necessary. The process and result of analysis and review shall be recorded and carried out an analysis to safeguard impartiality and a review of its effectiveness in Management Review once a year.

A CTI Certification’s Impartiality Statement treated as fundamental principle and regulation applied to all the relevant activities will be integrated in public available information package and formally publicized.

4.4 Safeguard impartiality at individual level

Every staff including subcontractors shall sign a Personal Impartiality Statement at time of recruitment.

The impartiality related requirement is mandatory induction program for newly hired staff.

The New Business Operation Manager or authorized reviewer will arrange case specific Conflict of Interest (COI) Assessment prior to designate specific jobs to appointed personnel including subcontractors. The Conflict of Interest shall assess persons or organizations engaged in the identification, development, consultancy and financing of the project activity or PoA, including all project participants of the project activities, and their parent companies or subsidiaries, and other companies related to the project activities. The specific jobs include validation, verification, special validation or verification and related training.

During the working process, the designated internal and external personnel shall report to CTI Certification

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any situation of influence, pressure, force and/or threat from CDM PPs, and their parent companies or subsidiaries, and other related companies, that may threaten their independence in the course of validation and/or verification/certification of CDM PA. Then, the mitigation plan or measure in COI shall be worked out and taken.

The authorized reviewer and every assigned staff shall complete COI assessment and reveal potential conflict of interest in transparent, active and timely manner prior to the specific jobs. The mitigation plan or measure will be developed accordingly and addressed in COI assessment based on principles mentioned in 4.1 if necessary.

5. DOCUMENTS AND RECORDS

Document: NBD/OP1/WI1 Constitution of Governing Board.

Document: NBD/OP1/WI2 Impartiality Assessment Report

Record: NBD/OP1/F1 CTI Certification's Impartiality Statement

Record: NBD/OP1/F2 Personal Impartiality Statement

Record: NBD/OP1/F3 Conflict of Interest Assessment

Revision	Revision Date	Key changes in brief
A	20 th Dec 2010	New Release
A.1	29 th Dec 2011	Add the remark for CDM requirement of not allowing the person related to the same client to be involved in Validation and/or Verification/Certification.
A.2	30 th Jan 2012	Revise the engaged personnel requirement in 4.1.2; Add the requirement of updating Impartiality Assessment Report in 4.2.
A.3	15 th Aug 2012	Add the analysis of financial pressure in 4.1.1; Add the requirement of personnel report any situation of influence or pressure from CDM PPs in 4.3.
A.4	22 nd Apr 2013	Add the "Authorized reviewer" to implement the COI Assessment in 4.3.
A.5	1 st Jan 2015	Update according to CDM Accreditation Standard 6.0
A.6	11 st Aug. 2016	Add the provisions on impartiality for shipping MRV
A.7	11 st October 2022	Add Terms of reference of the impartiality committee in Section 4.2 to respond the findings raised in the initial desk review for re-accreditation by CDM AT on 26/09/2022
A.8	9 th January 2023	Supplement the requirement to conduct CoI assessment on the parent company or subsidiaries of all project participants, and other companies, which are in the identification, development, consultancy and financing of the project activity or PoA.