

1.4 Impartiality

1.4.1 Commitment to Impartiality

AWT acts impartially and avoids unacceptable conflicts of interest for validation and verification projects, by management, staff members and contracted verifiers. AWT requires all staff involved with validations/verifications to sign a *Commitment to Impartiality* document. AWT uses the information disclosed by staff members as input into identifying threats to impartiality. AWT is able to avoid potential or actual organizational conflicts of interest because there are no other related entities involved (i.e. a parent company or subsidiaries). AWT utilizes a board of directors' appointed committee to oversee the mechanism for impartiality. The committee is responsible for ensuring impartiality is maintained. The COI auditor is responsible for educating employees and subcontractors about issues relevant to maintaining impartiality, as well as ensuring impartiality is maintained as validation/verification activities are accomplished.

AWT reviews all information received from clients and/or responsible parties to determine potential risks to impartiality. Potential personal conflicts of interest are determined by the utilization of an *Internal Conflict of Interest* document that is signed by each validation/verification team member for every validation/verification project. Impartiality is documented using an *Impartiality* document. These documents are fully executed on or before the date the registry specific COI evaluation is signed to provide an objective record that internal evaluations of impartiality and conflict of interest have been carried out.

Specific risks to impartiality could include:

- Self-interest: if any member of AWT acts partially for any financial benefit
- Familiarity: having a personal relationship with a client and not receiving proper validation or verification evidence to complete the project
- Self-review: having an individual on staff review their own work and/or by providing consultancy and then assessing their validation or verification activities
- Sources of revenue: having a GHG project validation/verification client who is also a client in other areas of the business
- Intimidation: an individual being coerced openly or secretly to do something that is not impartial

AWT avoids impartiality by abiding by the following safeguards:

- AWT's value of their reputation and any legal liability they could face
- AWT's commitment to abide by the professional standards and regulatory requirements regarding independence through ANAB
- By understanding the needs and expectations of our clients
- AWT's COI Auditor's function and oversight by a board appointed committee
- By establishing and applying methods to determine the efficiency and effectiveness of each project, by having an internal audit performed by the internal peer reviewer
- By identifying potential conflicts of interest and dealing with them appropriately.
- Commitment by team leader, team members, internal peer reviewer and appeals, complaints and disputes representative to support the v/v process and to act impartially throughout the project's entirety, by signing an *Impartiality* document for every validation and verification project that they are a part of.

- AWT has a strict policy when hiring, training, and promoting personnel, which emphasizes the importance of impartiality, the potential risks that could arise and evaluating their impartiality regarding each client, so that they are successful at mitigating or eliminating any risks.

AWT follows a zero-tolerance policy. If impartiality were compromised the following steps would take place:

- The team leader would discuss the findings with the V/V Director
- A conference call would then be placed with the client
- AWT would then inform the protocol administrator about the findings
- A solution would try to be resolved to include:
 - Removing the team member who compromised impartiality, or
 - Declining the project altogether if a reasonable solution cannot be reached

1.4.2 Commitment to Objectivity

AWT will accomplish validation/verification activities with objectivity so that the process retains the utmost credibility. AWT will rely on internal process documents developed by the V/V Director to carry out assignments objectively. Team members will rely on the Team Leader to resolve gray issues that may occur during the process. A “gray” issue is defined as any issue not directly addressed in the program protocols.

1.5 Avoidance of Conflicts of Interest

AWT determines and reports any conflicts of interest or lack thereof to the administering program. AWT will strive to avoid any conflicts of interest for validation/verification projects through the following measures:

- AWT and its subcontractors avoid any actual or potential conflicts of interest with the responsible party and the intended users of the information.
- AWT and its subcontractors will not validate and verify GHG assertions from the same GHG project unless authorized by the applicable GHG program.
- AWT and its subcontractors will not validate or verify GHG assertion where it provided GHG consultancy services to the responsible party that support the GHG assertion.
- AWT and its subcontractors will be independent. AWT’s activities will not be marketed or offered as linked with the activities of any organization that provides consultancy.
- AWT and its subcontractors will not 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 which 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 a new client.
- AWT and its subcontractors will not 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.
- AWT and its subcontractors will not offer products or services that pose an unacceptable risk to impartiality.

- AWT and its subcontractors will not outsource the review and issuance of the validation or verification statement.
- AWT and its subcontractors will not state or imply that verification of a GHG assertion would be simpler, easier, faster, or less expensive if a specified GHG consultancy service were used. Likewise, AWT will take action when it is made aware of consultancy organizations stating or implying that validation/verification would be simpler, easier, faster, or less expensive if AWT were used.
- AWT will take action to respond to any threats to impartiality arising from the actions of other persons, bodies, or organizations.
- AWT and its subcontractors will demonstrate competence and due professional care consistent with their roles and responsibilities.
- AWT and its subcontractors will demonstrate ethical conduct throughout the validation/verification.
- AWT and its subcontractors will reflect truthfully and accurately validation/verification activities, conclusions, and reports.
- AWT and its subcontractors will meet the requirements of the standards or the GHG program to which the responsible party subscribes.

1.6 Mechanism for Oversight of Impartiality

The board appointed committee provides oversight to guarantee that impartiality is being achieved for validation/verification projects. The COI Auditor provides impartial monitoring and review to ensure independence. The following step-by-step procedures include:

- AWT is contacted by a client to provide validation and/or verification services.
- The COI Auditor is then provided with contact information for all involved parties and research regarding impartiality and conflict of interest takes place.
- The COI Auditor then researches the source(s) of income. The V/V Director oversees validation/verification finances. The combination of financial oversight provided by the Director and evaluation of sources of income by the COI Auditor demonstrates that commercial, financial, and other factors do not compromise impartiality. The COI auditor is completely independent from the validation or verification project.
- If there are no red flags regarding the sources of income and evaluation of finances, then the COI Auditor researches each company to determine the client's parent company and any subsidiaries.
- All staff members are then made aware of these findings at the initial team meeting to determine if impartiality will be compromised by any of the members.
- When AWT provides both validation and verification to the same client for the same project, special care will be given to the team assignments to maintain impartiality.
- If impartiality is compromised at this point, AWT would determine the necessary steps to maintain impartiality to include:
 - Removing the team member that poses risks to impartiality, or
 - Declining the project altogether if a reasonable solution cannot be reached.
- Once it is determined that impartiality is not compromised, the team leader, team members, internal peer reviewer and appeals, complaints and disputes representative then sign the *Impartiality* document, which confirms that all members will act impartially throughout the project. The *Impartiality* document must be fully executed on or before the registry

specific COI evaluation is signed to provide an objective record that internal evaluation of impartiality has been carried out.

- At this point the members discuss any potential conflicts of interest, as well as any potential conflicts of interest that could arise and all members then sign the *Internal Conflict of Interest* document. The *Internal Conflict of Interest* document must be fully executed on or before the registry specific COI evaluation is signed to provide an objective record that internal evaluation of conflict of interest has been carried out.
- If a conflict of interest is discovered at this point, AWT would determine the necessary steps to eliminate conflict of interest entirely to include:
 - Removing the team member that poses a conflict of interest, or
 - Declining the project altogether.
- Registry specific COI evaluation forms are completed and submitted to the applicable registry for review and approval.
- Once impartiality is established and it is determined that no conflicts of interest exist according to internal processes and registry evaluation, a contract is finalized (signed) by the team leader.