



**ENSURING
IMPARTIALITY AND
INDEPENDENCE AND
CONFIDENTIALITY**



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Preamble

Carbon Standards International AG (CSI) offers services that require impartiality, independence and confidentiality.

The necessary regulations are developed and reviewed to ensure impartiality, independence, and to avoid conflicts of interest and maintain confidentiality within CSI.

Glossary

Certification	The overall aim of certifying products, processes or services is to give confidence to all interested parties that a product, process or service fulfils specified requirements. Certification of products, processes or services is a means of providing assurance that they comply with specified requirements in standards and guidelines, see ISO 17065.
Certification body	The organisation that conducts the certification.
Carbon Removals and Carbon Farming (CRCF)	Regulation (EU) 2024/3012 of the European Parliament and the Council of 27 November 2024 establishing a Union certification framework for permanent carbon removals, carbon farming and carbon storage in products.
Quality Manager (QM)	The quality manager is responsible for ensuring that quality standards are maintained within CSI. The responsibilities include developing quality guidelines and monitoring compliance with them.
Verification	Process for evaluating a statement of historical data and information to determine if the statement is materially correct and meets one of the Global C-Sink Standard requirements.
Validation and Verification Body (VVB)	VVBs independently validate and verify projects and corresponding C-sinks. This role is endorsed by CSI following this document https://www.carbon-standards.com/docs/transfer/4000007EN.pdf .

1. Aim and objective

Carbon Standards International (CSI) has established systems to ensure impartiality and independence. Any risks relating to impartiality are identified, addressed and isolated, and appropriate corrective measures are implemented.

In addition confidentiality and data protection are legal requirements.

2. Scope

All Carbon Standards International AG employees, committees and external expert networks, partner organisations, endorsed Certification Bodies (CBs) and/or Validation and Verification Bodies (VVBs) must abide by these rules to avoid financial, commercial or fiduciary conflicts of interest and treat all data as confidential.

3. Data Security and Privacy Statement

The confidentiality and protection of data is a legal requirement, which is taken into consideration in contracts, terms and conditions and guidelines.

The details are given in the individual contracts.

- All provisions regarding customer data confidentiality, data exchange, privacy, and information security are defined in detail in the CSI General Terms and Conditions document that is publicly accessible.
- CSI employees are contractually bound by legally binding confidentiality agreement, which prohibits the unauthorized sharing of any confidential or personal data.
- For more detailed information on how CSI handles personal data and safeguards customers' privacy, please see CSI's full Privacy Statement. The most recent version is always available at <https://global-c-registry.org/privacy-statement>.

4. Impartiality and independence

In general, a "conflict of interest" arises when one or more individuals or organisations have competing interests, whereby serving one interest may cause harm to another. A conflict of interest ("conflict of interest") arises when an individual's personal, financial, or other interests interfere with, or appear to interfere with, the integrity of CSI.

Impartiality plays an important role for Carbon Standards International (CSI). The company has set up a system of impartiality and independence. Any risks relating to impartiality are identified, addressed and isolated and appropriate corrective measures are set out.

5. Process responsibilities

- Implementation of process specifications by the Head of Quality Management (QM).
- Monitoring of impartiality maintenance, ensured by the Committee for Safeguarding Impartiality.
- Everyone is responsible for updating the template "conflict of Interest" to reflect their current status regarding potential conflicts of interest. Each person declares in this template that it will keep the relevant information confidential.
- The Quality Manager and the Human Resource (HR) Manager are responsible for administering the information in the software.
- Endorsed Certification Bodies (CBs) and/or Validation and Verification Bodies (VVBs) must ensure that they and their personnel are independent and impartial when providing services, and must keep information and data confidential.

6. Process indicators

- Signed copies of "declaration of conflict of interest" have been filed by all internal and external staff, by the Board of directors, expert networks, partners, VVBs, CBs, etc.
- Potential conflicts are recorded.
- Breach and complaints of impartiality are recorded under complaints.

7. Impartiality and independence at different levels

7.1. Company

- There is a balance between the interests of the company's different owners. They ensure independence and avoid conflict of interests.
- CSI prevents the staff, the programme registry administrators, the board members, and management from having financial, commercial or fiduciary conflicts of interest. According the Compliance Guidelines CSI individuals are not supposed to accept money in order to make the process of the results of services easier for a specific customer.
- The Board of directors, all individuals and committees organized according to the organization structure, as well as external expert networks or partner organizations as well as endorsed Certification Bodies (CBs) and/or Validation and Verification Bodies (VVBs) must sign that they have no conflict of interest and notify CSI about any potential conflict of interest as soon as they become aware of such conflicts. All employees, the management and experts are required to sign a statement as part of the CSI anti-bribery process. *"In my mentioned activity, it must be guaranteed that I am free from any and all commercial, financial and / or other influences that could affect my technical*

judgement and compromise my activities in term of confidentiality, objectivity, and impartiality in any way. Furthermore I declare that I will not receive additional sponsoring or accept presents as it is not compatible with the impartiality”.

- Periodic updates are required. Such measures may include to block the person for an individual operator/buyer or project.
- CSI manages it`s programme independently of proponents, implementers, the government, CBs and/or VVBs, and other stakeholders involved in compensation.
- Because no stakeholder dominates, CSI takes care that individual stakeholder, having a vested interest in the outcome of a decision, do not have decisive influence on that decision. Equal treatment of CSI clients: All clients can access services from CSI on equal terms, independent of size, turnover, number of employees or existing service orders.
- The prices are publicly available on the company homepage at www.carbon-standards.com and the fee calculator may be used to calculate the fees.
- According to the Compliance Guidelines CSI does not accept money/bribes in order to simplify client services. The CEO commits to impartiality, does not allow commercial or financial pressures to be exerted. Financial aspects are dealt with following the four-eye principle.
- Consulting: CSI can give training to the clients in webinars about the programme and the different standards – on standard level.
- Business activities are conducted in a transparent manner. All pertinent information can be accessed via the CSI homepage.
- The certificates and validation and verification statements are published at the Registry and at www.easy-cert.com. All projects are visible at the Global C-Sink Registry.

7.2. Personnel

- New employees must declare any additional activities in the conflict of interest section. Any possible changes relating to conflicts of interest must be reported immediately.
- CSI prevents the programme administrators, staff, board members, and management from having financial, commercial or fiduciary conflicts of interest in the governance or provision of programme services. They have to confirm in writing: *"In my mentioned activity, it must be guaranteed that I am free from any and all commercial, financial and / or other influences that could affect my technical judgement and compromise my activities in term of confidentiality, objectivity, and impartiality in any way. Furthermore I declare that I will not receive additional sponsoring or accept presents as it is not compatible with the impartiality”.*

- CSI prevents the programme registry administrators from having financial, commercial or fiduciary conflicts of interest in the governance or provision of registry services.
- All individuals of Carbon Standards International at all levels sign employment contracts and commit to declaring conflicts of interest by signing the template "conflict of interest". In accordance with the employment contract, personnel must report any past or present relationships with particular clients who are being credited on the Registry immediately. Changes regarding conflicts of interest must be notified immediately.
- Potential conflicts of interest must be disclosed prior to the provision of the service. Measures may include to block the person for an individual operator/buyer or project.
- Anyone with a potential conflict of interest will be excluded from the decision making process for this activity.
- Non-compliance with the notification requirement constitutes a breach of contract and may result in the immediate termination of the contractual relationship.
- If new conflicts of interest arise during the employee`s time they must submit the "self-declaration of conflicts of interest" and a new assessment of the relationships will be undertaken and a new assessment is undertaken of the relationships.
- The staff also declares that it does not accept unauthorized money or goods to make it `easier` for the company to fulfil the service.

The Quality Manager is responsible for collecting the signed templates, checking them and putting them into the software. The CEO may be consulted if there are special confirmations.

7.3. Independent audits, validation, and verification and/or certification

CSI endorses Certification Bodies (CBs) and/or Validation and Verification Bodies (VVBs) that are conducting independent audits, validations and verifications and/or certifications.

- As part of the application, CBs / VVBs must submit the procedure that they are working independent and declare any conflicts of interest as defined in the application template of CSI. CSI manages and prevents conflicts of interest between CBs/VVBs and the programme and the activities it supports.
- The personnel of the VVB/CB must maintain impartiality and be free from conflicts of interest, nor may any of their family members deal in, promote, or have a fiduciary relationship with anyone promoting or dealing in the offset credits being evaluated.
- Any organization which has been involved in the development of a particular project or has been paid to assist in protocol development or is involved in the project may not act as a CB / VVB for that project.

- Upon signature of the statement of work for an individual project, the CB /VVB must confirm a declaration ensuring impartiality and no other conflicts of interest for the company as well as for the individuals providing the service.
- The four-eyes principle must be used during the audit, validation and verification and/or certification.

7.4. Partners

The Management Board decides on collaborations with partners and sub-contractors. Impartiality and confidentiality is a component of any cooperation agreement.

7.5. Stakeholder

CSI takes care that individual stakeholder, having a vested interest in the outcome of a decision, do not have decisive influence on that decision.

7.6. Complaints/grievances and appeals

Complaints and appeals are processed by the CEO, COO and Quality Manager they may involve other personnel for administration of technical inputs. The four-eyes principle will be used during editing complaints and appeals procedures. They cannot be processed by personnel that was involved in the applicant party's service process.

8. Impartiality management process

Input	Activities	Descriptions	Responsibility	Output
Existing conflicts, new conflicts	Declaration of conflicts	Complete template for new and existing employees/individuals	- New employee introduction - Division Heads	All employee conflicts are known at all times and evaluated, with appropriate measures determined
Conflicts with regard to clients	Manage in software	Blocks and approvals of operations	Administration Division	Impartiality ensured for services
Changes	Risk assessment	Assess the relevant risks and determine the necessary corrective measures	Head of QM	Assessment of status is always up-to-date
Internal processes	Monitoring	Periodic checks by auditors and the Impartiality Committee	Coordination Head of QM	System check for vulnerabilities
Audit results	Effectiveness review	Assessment by COO and relevant persons	Coordination Head of QM	Feedback to Impartiality Committee
Mandate to Management	Implementation of specification	Integration of measures	Coordination Head of QM	Continuous improvement of process

9. Assessment of relationships, applicable measures

The relationships declared by personnel are assessed in accordance with the following criteria. A decision is made as to whether the declared relationship constitutes a conflict of interest that compromises impartiality.

Nature of relationship	Criteria for prejudice	Measure in accordance with 7.12
The administrator of the registry or other CSI individuals have financial, commercial or fiduciary interests in particular clients who are being credited on the Registry. Maintaining interests in particular buyers who are purchasing credits from suppliers, and paying a registry fee	Any form of involvement or cooperation, as well as financial or commercial interests, independent of its nature and/or extent	Block the person for this individual operator/buyer
Activities rendered to the operation, including consultancy	Any form of activity independent, as well as financial or commercial interests, of its nature and/or extent	If the related person agrees that, the risk of a conflict can be evaluated
An individual of a Certification Body (CB)/Validation and Verification Body ("VVB"), that has been approved to audit a specific carbon removal activity supplier	Any form of involvement or cooperation independent of its nature and/or extent	VVB/CB has to block the persons for the service of the individual operator at a minimum of 3 years. The personnel has to maintain impartiality and has to be free from conflicts of interest.
Organization which has been involved in the development of a particular project or has been paid to assist in protocol development or is involved in the project	Any form of involvement or cooperation, as well as financial or commercial interests, independent of its nature and/or extent	CB/VVB may not act as a CB / VVB for that project.
The personnel of VVB /CB or any of their family members are dealing in, promoting, or otherwise have a fiduciary relationship with anyone promoting or dealing in, the offset credits being evaluated.	Any form of involvement or cooperation independent of its nature and/or extent	Individual of CB/VVB may not act for that project.
Relatives in the operation or voluntary involvement.	Relatives up to and including the 3rd degree of kinship. Voluntary involvement of any nature independent of its nature and/or extent	Block the person for the individual operator

Other relationships which may risk impartiality: Persons holding other positions (such as a staff member or Director) in other organisations involved in generating, buying, verifying, managing, or selling carbon credits.	Ownership, directorship, management, personnel, joint utilization of resources, finances, contracts, marketing, membership	Evaluation by QM and Committee of Impartiality
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The COO and QM check the measures to be taken with regard to the declared relationships and assess special activities.

10. Technical implementation

The CSI software “Intact” is used for the technical implementation of the above mentioned measures. Customer data must be treated confidentially. IT will specify the authorization of access for the relevant data. The authorized persons have access with the use of passwords only.

11. The Committee for Safeguarding Impartiality

Tasks and composition of the Committee, see [Governance rules](#).

Safeguarding the impartiality of CSI in all its business activities:

- The Committee assesses the independence of CSI`s work on an annual basis. They are an external and neutral party to verify independence. Risks identified as part of the assessment of impartiality would be analysed and included in the company`s overall risk assessment and into the improvement process.
- The analysis include all risks to impartiality that may arise from self-interest, self-assessment, lobbying, undue familiarity, intimidation and competition, and is evaluated.
- The assessment results are reported to the other Committee members. The report will be sent to the CEO and COO and the Board of Directors. The CEO and COO as well as the QM are obliged to follow the Committee`s recommendations and make independent preventive or corrective measures and implement these measures.
- The Head of QM monitors all steps of the process and coordinates the interfaces.

12. Measures to prevent conflict of interests

- **Training:** personnel are trained in impartiality, independence, confidentiality, and how to avoid potential conflicts of interest.
- **Audits and monitoring:** assessments are carried out to identify potential conflicts and how they would be handled. The external Committee for Safeguarding Impartiality performs the tasks assigned to it and prepares an annual audit report.