Impartiality Policy

The Cradle to Cradle Products Innovation Institute

Cradle to Cradle Certified™ Products Program

Version 1.0

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# Table of Contents

Table of Contents .......................................................................................................................... 2
THE CRADLE TO CRADLE CERTIFIED PRODUCTS PROGRAM IMPARTIALITY POLICY REVISION HISTORY ..................................................................................................................... 3
Impartiality Policy Statement ........................................................................................................ 4
1 General .......................................................................................................................................... 5
  1.1 Purpose ..................................................................................................................................... 5
  1.2 Applicability ........................................................................................................................... 5
2 Normative references ..................................................................................................................... 5
3 Definitions and acronyms .............................................................................................................. 5
4 Structure ....................................................................................................................................... 7
  4.1 C2CPII organizational chart .................................................................................................. 7
5 Resources for ensuring impartiality ............................................................................................... 8
  5.1 Management commitment ...................................................................................................... 8
  5.2 Documentation ....................................................................................................................... 8
6 Process for ensuring impartiality .................................................................................................. 9
  6.1 Identification of threats to impartiality ................................................................................... 9
  6.2 Corrective action .................................................................................................................... 9
  6.3 Annual impartiality risk assessment ...................................................................................... 10
7 Mechanism for safeguarding impartiality .................................................................................... 11
  7.1 Impartiality committee composition ..................................................................................... 11
  7.2 Impartiality committee meetings .......................................................................................... 11
  7.3 Implementation ....................................................................................................................... 12
  7.4 Documentation ....................................................................................................................... 12
THE CRADLE TO CRADLE CERTIFIED PRODUCTS PROGRAM
IMPARTIALITY POLICY REVISION HISTORY

<table>
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Impartiality Policy Statement

The Cradle to Cradle Certified Products Program (C2C CPP) understands the importance of impartiality and potential conflicts of interest in carrying out its certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities.

C2C CPP staff conducts risk assessment annually to ensure impartiality and identify potential conflicts of interest relating to its certification activities, and Cradle to Cradle Certified Product Standard maintenance and revision activities.

C2C CPP shall identify and assess risks in all relationships that may result in a conflict of interest or pose a threat to impartiality. Threats to impartiality include, but are not limited to, the following:

- Self-interest threats: threats that arise from a person or body acting in its own interest to benefit itself;
- Subjectivity threats: threats that arise when personal bias overrules objective evidence;
- Familiarity threats: threats that arise from a person being familiar with or trusting of another person, e.g. an examiner or certification body personnel developing a relationship with a client that affects the ability to reach an objective judgment;
- Intimidation threats: threats that prevent a certification body or its personnel from acting objectively due to fear of a client or other interested party;
- Financial threats: the source of revenue for a certification body can be a threat to impartiality.

Conflict of Interest and objectivity are further covered through contractually binding agreements to ensure certification activities are conducted in an independent and impartial manner.

C2C CPP has documented structures, policies and procedures to manage impartiality and to ensure that the certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities are undertaken impartially.

C2CPII top management commits to ensuring impartiality in certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities.
1 General

1.1 Purpose

The purpose of this policy is to provide guidance and requirements for ensuring impartiality in conducting C2C CPP certification activities.

1.2 Applicability

This policy applies to the C2C CPP when it is conducting certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities. This policy applies to any actions of persons, bodies, and organizations external to the C2C CPP that may pose a risk to impartiality.

2 Normative references

ISO/IEC 17065-2012: Conformity assessment – Requirements for bodies certifying products, processes, and services

3 Definitions and acronyms

Certification Body (CB): An entity accredited by the C2CPII to perform conformity audits, render certification decisions, and issue certificates based on the Cradle to Cradle Certified Product Standard in accordance with the principles of ISO 17065.

Certification Scheme Owner (Scheme Owner): The Cradle to Cradle Products Innovation Institute (C2CPII).

Client: An entity seeking or holding Cradle to Cradle certification for its product(s).

Cradle to Cradle Certified Product Standard (the 'standard'): The governing standard that serves as the basis for all Cradle to Cradle product certifications.

Certification Standards Board (CSB): The independent body of stakeholders responsible for the maintenance, interpretation, and revision of the standard in accordance with the By-laws, polices and procedures of the C2CPII.
Cradle to Cradle Products Innovation Institute (C2CPII): The 501(c)(3) organization based in San Francisco, California that is responsible for promulgating the adoption of Cradle to Cradle® principles; and administering and maintaining the *Cradle to Cradle Certified Product Standard*.

Cradle to Cradle Certified Products Program (CPP): The program operating within the C2CPII that oversees and conducts certification activities in accordance with ISO 17065.

Cradle to Cradle Certified Products Program Staff (CPP staff): The individuals on the C2CPII staff responsible for administering and maintaining the standard.

Impartiality: actual and perceived presence of objectivity

Stakeholder: Any individual or entity with a valid cause for engagement with the Cradle to Cradle Certified Products Program.
4 Structure

The C2C CPP is guaranteed independence of certification activities or *Cradle to Cradle Certified Product Standard* maintenance and revision activities from other C2CPII operations and activities.

4.1 C2CPII organizational chart
5 Resources for ensuring impartiality

5.1 Management commitment

5.1.1 Top management of the C2CPII is committed to allocating resources necessary to ensure impartiality of the C2C CPP when it conducts certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities.

5.1.2 C2C CPP management shall ensure C2CPII top management is aware of, and provides sufficient resources to ensure impartiality when it conducts certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities.

5.2 Documentation

5.2.1 This impartiality policy

5.2.2 A legally binding conflict of interest (COI) agreement and disclosure form shall be executed between the C2CPII and all C2C CPP personnel engaging in certification activities or Cradle to Cradle Certified Product Standard maintenance and revision activities.

a) The agreement shall include provisions delineating conflict of interest.

b) The agreement shall include provisions for updating and maintaining accuracy of disclosures of conflict of interest.

5.2.3 Records

a) Records shall be kept regarding the identification of any threat to impartiality.

b) Records shall be kept regarding corrective action taken to address any threat to impartiality.

c) Records shall be maintained and retained in accordance with the C2C CPP QMS.
6 Process for ensuring impartiality

6.1 Identification of threats to impartiality

6.1.1 CPP personnel shall maintain vigilance to identify threats to impartiality.

a) Internal threats to impartiality posed by CPP staff or contractor actions shall be identified.

b) Threats to impartiality posed by persons, organizations, or bodies external to the CPP shall be identified.

6.1.2 External sources may identify threats to impartiality.

a) Any stakeholder may identify and report a perceived threat to impartiality.

6.1.3 Identified threats to impartiality shall be communicated immediately to CPP management. If deemed necessary for appropriate disposition, C2CPII top management shall also be informed.

6.1.4 CPP management or C2CPII top management shall evaluate the reported threat to determine its validity.

6.1.5 If deemed valid by management, a course of corrective action shall be developed and implemented.

6.2 Corrective action

6.2.1 Corrective action shall be sufficient to eliminate the threat.

6.2.2 Corrective action shall be implemented as quickly as possible by assigned qualified personnel or external person(s), as deemed appropriate by CPP or C2CPII management.

6.2.3 If corrective action requires additional training, such training shall take place as soon as possible.

6.2.4 If corrective action requires modification of a certification, any such modifications shall be implemented immediately and reflected in all certification documentation.
6.3 Annual impartiality risk assessment

The CPP shall conduct an annual risk assessment regarding threats to impartiality.

6.3.1 The annual risk assessment shall be conducted by qualified person(s) designated by CPP management or C2CPII top management.

a) Qualified CPP personnel approved by C2CPII top management may conduct the risk assessment, or

b) C2CPII top management and/or a qualified external person(s) or organization(s) may conduct the risk assessment.

c) As determined by C2CPII top management, qualified external person(s) or organization(s) may be engaged to conduct the risk assessment individually or in conjunction with CPP staff.

d) If deemed necessary to ensure the integrity of the risk assessment by CPP management or C2CPII top management, the risk assessment may be conducted entirely by a designated qualified external person(s) or organizations.

6.3.2 The risk assessment shall be conducted in a thorough and rigorous manner to identify threats regarding, but not limited to

a) Self-interest threats: threats that arise from a person or body acting in its own interest to benefit itself;

b) Subjectivity threats: threats that arise when personal bias overrules objective evidence;

c) Familiarity threats: threats that arise from a person being familiar with or trusting of another person, e.g. an examiner or certification body personnel developing a relationship with a client that affects the ability to reach an objective judgment;

d) Intimidation threats: threats that prevent a certification body or its personnel from acting objectively due to fear of a client or other interested party;

d) Financial threats: the source of revenue for a certification body can be a threat to impartiality.

6.3.3 Findings of the risk assessment shall be recorded with records maintained in accordance with the C2C CPP QMS.
6.3.4 Corrective action indicated by the risk assessment shall be implemented in accordance with 6.2

7 Mechanism for safeguarding impartiality

The certification scheme owner shall appoint a committee to safeguard impartiality.

7.1 Impartiality committee composition

The C2CPII shall appoint a committee with balanced representation to be the mechanism for safeguarding impartiality, comprised of

7.1.1 At least one client representative

7.1.2 At least one non-client stakeholder representative

7.1.3 At least one member of C2CPII top management

7.2 Impartiality committee meetings

7.2.1 Meeting frequency

The committee shall meet annually, or at a greater frequency if deemed necessary to effectively perform its activities. Meetings may take place in person, or by electronic conference.

7.2.2 Meeting requirements

a) The committee shall be granted access to all the information necessary to enable it to fulfill all its functions.

b) Attendance comprising a quorum of 2/3 of the committee membership shall be required before the committee may provide any input to the CB.

7.2.2 The committee meeting shall address and provide input on the following:

a) Policies and principles relating to impartiality of the CPP’s certification activities

b) Any tendency on the part of the CB to allow commercial or other considerations to prevent the consistent impartial provision of certification activities

c) Matters affecting impartiality and confidence in certification, including openness
7.3 Implementation

7.3.1 Input from the committee shall be implemented by the CB

a) The CB shall not implement any input that conflicts with its operating procedures, mandatory requirements, accreditation requirements, or regulations. Reasons shall be provided for not implementing such input.

b) The committee shall have the right to take independent action if the CB does not implement its input by informing stakeholders, accreditation bodies, or other authorities. Any such informing shall comply with the confidentiality requirements established by the parties involved (client, CB, AB, suppliers, etc.)

7.4 Documentation

7.4.1 Minutes shall be kept.

a) Meetings to determine composition of the impartiality committee

b) Impartiality committee meetings

7.4.2 Records of committee input shall be maintained.

7.4.3 Records of input implementation shall be maintained