Safeguarding Impartiality Policy

Document ID: OXZ-IMP-01-POL

Version: v2.2

Last modified date: 29-10-2026

Prepared collectively by the Impartiality Committee, for finalization in December 2026 and implementation effective January 1, 2027.

1. Introduction

OXÏ-ZEN is committed to maintaining impartiality, integrity, and transparency in all its validation and verification/certification activities. This policy outlines the measures OXÏ-ZEN adopts to safeguard impartiality, manage conflicts of interest, and ensure that its operations are credible, independent, and non-discriminatory. OXÏ-ZEN guarantees its decisions are free from influence or pressure by maintaining sufficient qualified personnel, financial stability, and ensuring no constraints affect its judgment.

2. Principles of Impartiality

OXÏ-ZEN recognizes the importance of impartiality in performing its functions and is dedicated to:

- Acting credibly, independently, and transparently.
- Avoiding any conflict of interest that could compromise impartiality.
- Ensuring no conflict of interest exists between its validation/verification functions and other parts of the organization or related bodies.
- Maintaining independence in judgment through adequate human and financial resources to prevent undue influence.
- Operating with integrity to ensure fair, non-discriminatory practices in all validation and verification activities.

3. Safeguarding Impartiality at Policy Level

3.1 Top Management Commitment

Top Management shall ensure:

- Establishment and maintenance of an impartiality governance system
- Implementation of this Policy across all organizational levels
- Allocation of adequate resources to support impartiality controls
- Independence between validation/verification functions and all other DOE functions

3.2 Statement of Impartiality

OXÏ-ZEN DOE formally recognizes that impartiality is fundamental to credibility and shall:

- Manage all conflicts of interest proactively
- Ensure objectivity in all validation, verification, and certification decisions
- Prevent undue influence from internal or external sources

3.3 Management of Threats to Impartiality

OXÏ-ZEN DOE shall identify, document, and respond to threats arising from:

- Internal organizational structure
- Personnel relationships
- Related bodies
- Outsourced entities
- External stakeholders

All identified threats shall be assessed and mitigated using documented procedures.

3.4 Organizational Culture

OXÏ-ZEN DOE shall maintain a culture that:

- Promotes ethical conduct and independence

- Encourages disclosure of conflicts of interest
- Supports impartial decision-making without pressure or bias
- Ensures personnel are trained on impartiality requirements

4. Organizational Measures for Impartiality

4.1 Impartiality Committee (IC)

OXÏ-ZEN DOE shall establish an Impartiality Committee (IC) as an independent governance body to oversee impartiality systems.

4.1.1 Structure and Composition

The Impartiality Committee shall consist of a minimum of three (3) members and a maximum of seven (7) members, including the Chair.

Membership shall be structured to ensure balanced representation of stakeholder interests and prevent dominance by any single interest group.

The Committee shall include representation from the following stakeholder categories, where reasonably available:

- Independent academic or technical experts
- Civil society or environmental stakeholders
- Industry or market participants
- Public sector, governance, or regulatory stakeholders
- OXÏ-ZEN representatives who are not directly involved in validation, verification, certification, technical review, quality management decision-making, or commercial functions

At least two-thirds (2/3) of Committee members shall be external to OXÏ-ZEN and free from commercial, financial, operational, governance, or employment relationships that could create actual or perceived conflicts of interest.

Internal OXÏ-ZEN personnel shall not exceed one-third (1/3) of total Committee membership.

The Committee shall operate under documented Terms of Reference approved by Top Management.

4.1.2 Independence

The IC shall:

- Be independent from validation, verification, and certification functions
- Report directly to Top Management
- Be chaired by an **external independent member not affiliated with OXÏ-ZEN or related bodies**
- Include balanced representation of key interested parties (academic, civil society, industry, public sector)
- Operate under documented Terms of Reference

4.1.3 Meetings and Quorum

- The IC shall meet at least once per year
- Maximum interval between meetings shall not exceed 15 months
- All proceedings shall be fully recorded
- Extraordinary meetings may be convened by the Chair where significant impartiality concerns arise.

Quorum

A meeting shall only be considered valid where:

- At least sixty - six percent (66%) of appointed members are present
- At least two external independent members are present
- External members constitute the majority of members present
- At least two different stakeholder categories are represented

Where quorum is not achieved, no formal decisions or approvals shall be made.

Decision-Making

The Committee shall seek to reach decisions by consensus wherever possible.

Where consensus cannot be achieved, decisions shall be made by simple majority vote of members present and entitled to vote.

In the event of a tie, the Chair shall have the casting vote.

All proceedings, recommendations, dissenting opinions, actions, and decisions shall be formally documented in meeting minutes.

4.1.4 Access Rights

The IC shall have unrestricted access to:

- Validation reports
- Verification reports
- Certification files
- COI declarations and registers
- Impartiality risk assessments
- Outsourcing and subcontracting records
- Related body disclosures
- Any documentation necessary to assess impartiality risks and controls

The Committee may request additional information from any OXÏ-ZEN function as necessary to fulfil its responsibilities.

4.1.5 Responsibilities

The IC shall:

- Review COI analysis and impartiality risk assessments
- Approve mitigation measures for impartiality threats
- Monitor effectiveness of impartiality systems
- Review implementation of Section 11 controls
- Review impartiality implications of outsourcing and subcontracting arrangements
- Review impartiality-related non-conformities and corrective actions
- Prepare an annual impartiality synthesis report

- Escalate unresolved issues to Top Management within 7 days
- Escalate to UNFCCC Supervisory Body where Top Management does not act

The IC shall not participate in or influence validation, verification, certification, technical review, or commercial decision-making activities.

4.1.6 Annual Review of Committee Effectiveness

The composition, independence, effectiveness, and stakeholder balance of the Impartiality Committee shall be reviewed annually.

The review shall assess:

- Adequacy of stakeholder representation
- Independence of members
- Attendance and participation levels
- Emerging conflicts of interest
- Effectiveness of recommendations issued
- Continued suitability of Committee composition

Results of the review shall be documented and reported to Top Management.

4.2 Reporting Line

The IC shall report directly to Top Management and may escalate matters to the UNFCCC Supervisory Body via the Secretariat in accordance with Paragraph 38 of the Standard.

The Committee shall have unrestricted access to the Chief Executive Officer and governing body representatives where applicable.

The Committee shall not report through, nor be subordinate to, Validation Managers, Verification Managers, Technical Review Personnel, Quality Management Personnel, Contract Review Personnel, or any operational function involved in Article 6.4 validation, verification, or certification activities.

The organizational structure of OXÏ-ZEN shall clearly identify the Impartiality Committee as an independent governance body reporting directly to Top Management.

The IC may escalate matters to the UNFCCC Supervisory Body via the Secretariat in accordance with Paragraph 38 of the Accreditation Standard.

5. Operational Safeguards for Impartiality

5.1 Analysis of Threats Against Impartiality

OXÏ-ZEN DOE shall establish and maintain a documented procedure to identify and assess impartiality threats.

5.1.1 Frequency of Analysis

- Conducted at least annually
- Conducted upon significant organizational changes (structure, ownership, mergers, acquisitions)

5.1.2 Threat Categories

The analysis shall include at minimum:

- Financial dependence (source of revenue)
- Self-interest risks
- Self-review risks
- Familiarity or trust bias
- Intimidation or coercion risks

5.1.3 Organizational and Structural Risks

The analysis shall also include:

- Laboratory testing or calibration activities
- Prior involvement of personnel in project development or consultancy
- Performance targets linked to project volume
- Relationships with related bodies or outsourced entities

5.1.4 Disclosure Requirements

OXÏ-ZEN DOE shall document and disclose:

- Organizational structure and related bodies

- Ownership, governance, and management relationships
- Shared resources or financial arrangements
- Outsourcing and subcontracting relationships
- Commercial or inducement-based relationships

5.2 Mitigation of Impartiality Threats

OXÏ-ZEN DOE shall implement a documented mitigation procedure including:

- Prohibitions of high-risk activities
- Restrictions with defined control points
- Transparent disclosures

5.2.1 Mandatory Mitigation Controls

The DOE shall ensure:

- No personnel are assigned to projects where prior consultancy/development involvement exists
- No outsourcing to entities engaged in consultancy, development, or financing
- No dual roles in validation and verification of the same project unless permitted by standard
- Immediate recusal of personnel where conflicts arise
- Documentation of all mitigation actions

5.2.2 Contractual Safeguards

- Payments shall not be linked to validation or verification outcomes
- Only stage-based payments are permitted
- Contracts shall enforce impartiality obligations

5.3 Operational Prohibitions

OXÏ-ZEN DOE and related bodies shall NOT:

- Engage in project development or financing activities
- Provide consultancy or training specific to A6.4 projects
- Market services linked to consultancy organizations
- Pay or receive commissions for client acquisition

5.4 Personnel Independence Requirements

All personnel shall:

- Declare conflicts of interest prior to assignment
- Refrain from providing consultancy or advisory services during engagements
- Report undue influence or pressure immediately
- Be removed from assignments if conflicts are identified

5.5 Outsourcing Controls

OXÏ-ZEN DOE shall ensure:

- No outsourcing to entities engaged in consultancy, development, or financing of A6.4 projects
- No commercial dependency between outsourced entities and project participants
- Full independence of subcontracted functions

6. Review of Effectiveness

OXÏ-ZEN DOE shall:

- Conduct annual review of impartiality systems
- Analyze COI records, mitigation effectiveness, and non-conformities
- Evaluate overall system effectiveness
- Report findings and recommendations to Top Management
- Maintain documented evidence of review outputs

7. Transparency and Reporting

OXÏ-ZEN DOE shall ensure:

- Transparent documentation of impartiality systems
- Availability of impartiality-related records for audit purposes
- Timely response to impartiality concerns
- Annual reporting of impartiality performance

8. Implementation and Maintenance

This Policy shall be:

- Implemented across all organizational levels
- Supported by SOPs, forms, registers, and IC governance documents
- Reviewed at least annually
- Updated when UNFCCC requirements or organizational structure changes