

## **Impartiality Policy**

1. Vireo Srl regards impartiality as critical to its professional integrity and reputation in carrying out its management system, product, and chain of custody certification activities.
2. In particular, the management places emphasis on competence, the management of conflict of interest, confidentiality and the objectivity and professional ethics of management system, product, and chain of custody certification activities.
3. Vireo:
  - 3.1. aims to identify any potential conflicts of interest at the earliest possible time, and to manage any actual conflicts of interest appropriately.
  - 3.2. recognises the importance of ensuring that all certification decisions are objective and independent.
  - 3.3. will not market or offer as linked with the activities of an organization that provides consultancy, implying that certification would be easier, faster or less expensive if a specified consultancy organization were used.
  - 3.4. ensures that activities of separate legal entities (if any) with which it has relationships, do not compromise the impartiality of its certification activities. This also applies to separate legal entities that have a relationship with the legal entity of which the CB forms a part of.
4. As such, the Management of Vireo Srl is committed to:
  - 4.1.1. Ensuring the impartiality of operations through the regular reporting to our Impartiality Committee.
  - 4.1.2. Protect the confidentiality of all information obtained in the course of its certification activities at all levels of the organization, except as required by law, in accordance with our confidentiality policy.
  - 4.1.3. Safeguard the organisation against financial and/or other pressures that might influence decisions.

- 4.1.4. Ensure, through appropriate procedures, assessment of competencies and continual professional development that certification activities are conducted by competent personnel
  - 4.1.5. Guarantee that certification decision is made by different person from who carried out evaluation.
  - 4.1.6. Not give advice or consultancy to companies that will be certified by Vireo Srl. Vireo Srl and any part of the same legal entity (if any) and entities (if any) under its organizational control or controlling it shall not offer or provide consultancy within the scope of accreditation to its clients.
5. The reviewer, the reviewer or approver the resolution of a complaint or appeal, the decision maker or the auditor must be excluded by this job in the following cases:
  - 5.1. He/she has worked for the client in the last 3 years
  - 5.2. Has any agreement to start work for the client in the next 12 months
  - 5.3. Has relations with the top management of the client.
6. The management of Vireo Srl commits itself to strict implementation of our impartiality policy.
7. The Impartiality policy is made available and transmitted to all employees that shall respect this policy.
8. All employees and body personnel (external personnel is included) shall respect the commitment and shall inform the top management of any issue that may affect impartiality of certification activities.
9. Personnel (including those acting in a managerial capacity) who have provided consultancy, or been employed by a client, shall not be used by the CB to audit, review, make certification decisions or to review or approve the resolution of a complaint or appeal for that client within three (3) years following the end of the consultancy or employment.
10. All Vireo Srl's staff members shall sign the Conflict of interest declaration.

Padova, 31/01/2025

Luigi Mazzaglia  
Vireo S.r.l.

A handwritten signature in black ink, appearing to read 'Luigi Mazzaglia', written in a cursive style.