

C.1 POLICIES (Impartiality, Confidentiality and Objectivity)

The following policies are employed by COFI in order to maintain its impartiality and objectivity as a third-party certification organization:

- C.1.1 COFI as a trade organization is specifically precluded under the Competition Act, C.34 from direct involvement in commercial activities, thereby maintaining independence from direct commercial, marketing and sales functions.
- C.1.2 Although COFI has a product promotion department, the activities of the Quality Control Department are distinctly separate from marketing related functions.
- C.1.3 The Quality Control Staff members of COFI are not involved in the promotion or sale of any product which it may test or certify, although data produced by and expert advice provided by the staff of COFI's Quality Control Department may be used by clients in the marketing or promotion of products.
- C.1.4 Staff and members of committees potentially coming into contact with information that could be potentially confidential or create a foreseeable conflict of interest are required to sign a Confidentiality and Conflict of Interest statement which is kept on file. A sample of this statement is located in Appendix J.
- C.1.5 All subcontractors and their employees that might come into contact with data being collected are required to sign a Confidentiality and Conflict of Interest statement which is kept on file. A sample of this statement is located in Appendix J. Any subcontractor under consideration for a given certification testing project shall not be involved in the design or production of the product being tested for certification.
- C.1.6 Certification & Testing staff immediately involved with an in-process certification or ongoing certification evaluations are not permitted to provide advice or consultancy services to the applicant as to methods of dealing with matters which are barriers to the certification being sought or an existing evaluation for certification.
- C.1.7 Information about the client or the certified manufacturer obtained from sources of the 3rd party (e.g. complainant, regulators) shall be treated as confidential.
- C.1.8 Except for information that the client makes publicly available, or when agreed between COFI and the client, all other information is considered proprietary information and shall be regarded as confidential. COFI shall inform the client, in advance, of the information it intends to place in the public domain.
- C.1.9 COFI shall identify risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel. Therefore, COFI shall have the following system, as a mechanism for safeguarding its impartiality (see Appendix J).

If a risk to impartiality is identified, COFI shall be able to eliminate or minimize such risk, and the results of those actions shall be reviewed by the Committee for Impartiality, which is structured by the 3rd party members.

C.1.10 The mechanism for safeguarding COFI's impartiality shall provide input on:

- a) The policies and principles relating to the impartiality of its certification activities,
- b) Counteracting any tendency on the part of a certification body 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 and public perception.

C.1.11 The mechanism shall be ensured to have access to all the information necessary to enable it to fulfill all its functions.

C.1.12 If the top management of COFI does not follow the advice of this mechanism, the mechanism shall have the right to take independent action. In taking appropriate action, the confidentiality requirements related to the client and COFI shall be respected.

C.1.13 COFI shall identify and invite key interests for the Committee.

C.1.14 COFI shall have top Management commitment to impartiality.

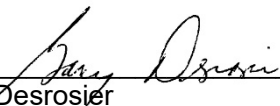
C.1.15 COFI shall keep records confidential. Records shall be transported, transmitted, and transferred in a way that ensures confidentiality is maintained.

2. Conflict of Interest

All staff of the Council of Forest Industries are aware that work performed for our members to generate data and knowledge is proprietary information.

To ensure the confidentiality of data, technology, knowledge, and information collected, COFI staff shall keep all in confidence. COFI Staff shall not divulge data, information, knowledge or technology to any party in any manner which could jeopardize the legitimate technical, financial or business interests of the Association or members.

All COFI Staff involved in the certification process shall sign a contract which they commit themselves to uphold Confidentiality and Conflict of Interest.



Gary Desrosier
Quality Control Manager
COFI

Date: _____
November 29, 2019