

# Confidentiality and Impartiality

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***Dillon completes third-party Greenhouse Gas (GHG) Validation and Verification work under the umbrella of Dillon's Privacy Policy.***

## Confidentiality

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Confidentiality is legally enforceable in our client contracts for projects and will be applied as follows:

- Dillon's personnel treat all information obtained or created during the validation or verification, whether from the client or another party, as confidential
- Dillon does not disclose information that is not public regarding a client or responsible party to a third party without express consent of that party, unless notification to the client is prohibited by law
- Dillon informs the client and responsible party before placing information in the public domain, as required under specific GHG programmes
- Dillon uses equipment and facilities to securely handle confidential information
- Dillon will treat information about the client obtained from other sources (e.g., complainant, regulatory authority) as confidential. Dillon will keep the source of information confidential, unless the source agrees that information can be shared with the client

## Impartiality

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Dillon's policies and procedures regarding conflict of interest (COI) and safeguarding impartiality reflects the commitment by our Board of Directors and each staff member to act impartially in all activities including GHG validation and verification activities. Dillon understands that the principles of COI and impartiality are essential to providing independent third-party auditing services.

For each assignment (in the pre-engagement phase), Dillon conducts a thorough review of potential COI and threats to impartiality at the operational, policy and corporate levels. Our team is required to personally attest to any potential threat to impartiality or potential COI on a Project Impartiality, Resources, and Conflict (PIRC) Form.

Should a potential COI or threat to impartiality be identified, our team will work to implement mitigation measures, if applicable, or alternatively Dillon may determine that we are not in a position to provide proper and impartial third-party GHG assurance services for the assignment/client.