RAINFOREST ALLIANCE POLICY
ON INDEPENDENCE IN CERTIFICATION

Rainforest Alliance auditing and certification services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation[1] decisions are under the purview of the RA-Cert Division.

This policy in full is posted as a pdf attachment on the Rainforest Alliance website in the certification section. Additionally, portions of this policy are included directly on the following web page: http://www.rainforest-alliance.org/about/integrity/accountability.

Ensuring our Integrity

As a leader in the development of best management practices for sustainable land use, the Rainforest Alliance offers third-party certification and eco-labeling services to forests and farms managed in ways that reduce environmental impacts and increase social benefits. Our RA-Cert Division evaluates and certifies sustainable forestry operations under the standards of the Forest Stewardship Council (FSC) using the Rainforest Alliance Certified[TM] Seal and FSC labels. Likewise RA-Cert evaluates sustainable agriculture using the Sustainable Agriculture Network standards to reward with the Rainforest Alliance Certified[TM] Seal. In connection with our nonprofit mission, we work proactively to ensure that *our audit and certification services are available to* operations of all sizes, and to *all applicants whose activities fall within the scope of our work*.

All our work at the Rainforest Alliance is guided by the principles of respect, innovation, collaboration, integrity and accountability. A significant part of our work focuses on certification services, which enable us to:

- Provide farmers, foresters and tourism entrepreneurs with guidelines on how to improve their practices;
- Hold companies accountable;
- Enable consumers to make informed choices.

Certification, verification and validation (collectively referred to as "certification") are only a means to an end for Rainforest Alliance. Our ultimate goal is to improve how natural resource-based economic activities are managed. We believe that certification will lead to a sustainable society only when it is conducted in an independent, objective, transparent, and accountable manner. Our other activities, including training, technical assistance, product sourcing and other value chain work, will result in a sustainable society only if these are conducted in a way that does not diminish the integrity of certification. To that end, we have developed policies and procedures to ensure the integrity of our auditing and certification activities, and elimination of conflicts of interest, through:

- Structural and operational independence
- Financial independence
- Decision making independence
- Disclosure
- Oversight and accountability
- Stakeholder feedback
- Whistleblower policy

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[1] Certification refers to all auditing services implemented by RA-Cert, including verifications and validations.

Structural and Operational Independence

We have created an organizational structure that separates auditing and certification activities from other Rainforest Alliance activities. Rainforest Alliance's auditing and certification services are housed in the RA-Cert Division, a separate unit from Agriculture, Forestry, Climate and Tourism programs which may provide technical support and training to forest owners, tourism operations and farmers, and from operational units such as the Finance department. This structural separation mitigates conflicts of interest from other Rainforest Alliance programs by maintaining completely independent lines of management reporting and accountability.

To enhance this structural separation and independence, RA-Cert has created rules and procedures to protect the independence, integrity and confidentiality of the audit process. These include:

- RA-Cert staff are dedicated exclusively to auditing functions and do not engage in technical assistance with audit clients. RA-Cert auditors must meet qualifications and competency requirements and verify independence prior to participation on any audit.
- Firewalls and information access policies strictly limit accessibility by Rainforest Alliance staff outside of RA-Cert to databases and IT systems housing certification records and client data, ensuring the complete confidentiality of auditing and certification processes, and insulation of those processes from interference by other programs. Similar firewalls prevent RA-Cert staff from accessing information and records related to non-RA-Cert division/unit activities and clients.
- RA-Cert has developed inter-departmental Memoranda of Understanding (MOUs),that define and control the interactions between RA-Cert and other divisions/programs of Rainforest Alliance. The objective of the MOU initiative is to eliminate potential operational conflicts of interest. Among other guidelines, the MOUs restrict the kinds of interactions that other staff members may have with RA-Cert auditors and field staff who are responsible for conducting audits and making certification decisions. MOUs have been developed between RA-Cert and the following Rainforest Alliance divisions and programs: Forestry Division (TREES and SmartSource Programs), Sustainable Agriculture (Sustainable Landscapes and Sustainable Value Chains) and Climate. MOUs with other Rainforest Alliance divisions including Communications, Development, Evaluation and Research, and Finance are currently being developed. The MOUs are signed by the relevant division directors.
- The inter-departmental MOU initiative includes quarterly meetings between division management and technical staff, for example, RA-Cert's Director and Technical Specialist participate in the meeting with counterparts from the other division. The objective of the meetings is to review recent activities and upcoming client engagements to ensure potential conflicts are avoided.

Financial Independence

Maintaining financial independence is a critical element of our ability to provide objective and independent auditing and certification services.

Rainforest Alliance has adopted a policy to accept contributions (monetary or in-kind) from entities that use our certification services, only in the following permitted ways:

1. Fees for certification and related services;
2. Sponsorship or other support of public events;
3. Funding for educational, training or outreach activities.

An individual involved in decisions regarding the acceptance or use of contributions from a specific entity cannot be involved in certification decisions regarding that entity.

Decision Making Independence

Rainforest Alliance certification decisions are based upon review of audit reports, comments from the audited business owners and managers, and the input of stakeholders and peer review comments. Audits are conducted by RA-Cert staff and contractors who meet established criteria for experience and training and who have not provided related consulting services or technical assistance to the operation being audited for at least the past two years. This restriction forms part of the Conflict of Interest Policy (internal reference document # G-01), which applies to all RA-Cert staff and contractors, including subcontractor personnel.

Before being appointed, all auditors -- whether staff or contractors -- are required to declare any potential conflicts in writing (internal reference document codes CA-12, G-37). Management reviews disclosure statements and any conflicts must be resolved.

Audit and certification decision reviews, undertaken as part of our Quality Assurance program, are conducted by authorized RA-Cert/subcontractor staff members who also have previously made written declarations of independence. This includes the requirement that individuals have not participated in the audit being reviewed, or provided technical assistance or consulting services to the business being certified for at least a two-year period prior to the decision review (internal reference document codes G-01, Q-01 and Q-08).

Besides the designated individuals described above, operating within the framework of these and additional policies, no other staff members have any involvement or influence in certification decisions, including the RA-Cert Director, other division directors, executive office staff (including the President), and the board of directors.

Dispute Resolution: Complaints and Appeals

RA-Cert has an established procedure for complaints and appeals (disputes) that may be exercised by owners of the business that was audited or outside stakeholders (internal reference document # G-03). Designated personnel investigate all complaints as well as appeals of certification decisions. Responses are documented and decisions provided to those who made the complaint. In the case of forestry, anyone who is not satisfied with the certification body investigation and findings may submit a separate dispute to the Forest Stewardship Council as the scheme owner, or Accreditation Services International (ASI), the international body that accredits the Rainforest Alliance for FSC certification services. Disputes related to the Sustainable Agriculture Network (SAN) certifications are sent to the applicable certification body for handling according to SAN requirements.

Disclosure

As discussed above, the Rainforest Alliance Conflict of Interest Policy requires all directors, officers and staff members to disclose any actual or potential conflicts, both at the time of engagement and annually. An internal committee reviews these disclosures and reports to the Audit and Risk Committee on a quarterly basis. The Audit and Risk Committee consists of three or more directors of the Rainforest Alliance Board and are independent of the financial control of Rainforest Alliance and remain independent of Rainforest Alliance certification decision-making. The Committee meets a minimum of four times annually.

Staff members and contractors who contribute to audit evaluations and certification decisions are required to disclose in writing all possible and actual conflicts of interest at the time the perceived conflict becomes evident per internal document G-01 RA-Cert Conflict of Interest Policy.

Ensuring our Integrity -- Oversight and Accountability

The Rainforest Alliance Program Committee, which is independent of the financial control of the organization and certification decision-making, meets on a quarterly basis and reviews at least annually our performance in maintaining full independence. At any time the Committee may request specific information from RA-Cert related to impartiality, independence, and confidentiality assurance. If there is a lack of cooperation by RA-Cert management, the Committee has the option to raise concerns with accreditation bodies or other relevant authorities.

Members of the Committee are not remunerated by the Rainforest Alliance in any way, do not have any material financial interest in any entity doing business with us and are not involved with our certification decision-making.

Fiduciary oversight of our activities rests with our Board of Directors. Although we believe that Director experience with auditing and certification can be quite valuable, it is our policy that our Board never be dominated by Directors with an interest in Rainforest Alliance certified or verified operations.

Audit findings are documented in reports that are reviewed for quality and adherence to established procedures by trained, qualified, and authorized designates within RA-Cert.

International Assessments

The Rainforest Alliance is accredited by Accreditation Services International (ASI) for the Forest Stewardship Council (FSC) scheme. FSC is an independent, international organization that promotes responsible management of the world's forests. To achieve and maintain FSC accreditation, we must demonstrate that our certification procedures meet stringent technical and procedural requirements and that our structure and procedures guarantee independence of our auditing activities and certification decisions. ASI audits the Rainforest Alliance annually at the headquarters level as well as through sample-based auditing of field performance through audits of Rainforest Alliance forest management and chain-of-custody certificate holders. Every five years the ASI undertakes a complete re-accreditation of the Rainforest Alliance; more recently, our re-accreditation evaluations took place in 2006 and at the end of 2011.

Our carbon validation and verification activities are likewise covered by an accreditation granted in 2008 by the American National Standard Institute for ISO 14065:2007 Greenhouse gases.

Our sustainable agriculture auditing activities are conducted as an inspection body of Sustainable Farm Certification, Inc. (SFC) under the Sustainable Agriculture Network (SAN). SFC has been accredited under the International Standardization Organization (ISO) Guide 65 for certification bodies by IOAS. RA-Cert is pursuing its own accreditation by initiating an application process with IOAS for ISO 65 and SAN accreditation. Note that our Forest Stewardship Council-accredited forestry certification program is already ISO compliant by way of the ISO 65 guide and various other ISO elements that are incorporated into FSC accreditation standards.

We are also a member of the International Social and Environmental Accreditation and Labeling Alliance (ISEAL), an organization established to strengthen the integrity of social and environmental certification systems and whose members are international standard-setting, certification and accreditation organizations.

Whistleblower Policy

To help ensure that the Rainforest Alliance complies with the highest standards of financial reporting and lawful and ethical behavior, the Board of Directors established the Whistleblower policy and procedure for the reporting of illegal or unethical conduct in connection with the Rainforest Alliance's finances or other aspects of its

operations, and the retention and treatment of such complaints, including confidential, anonymous submissions received from employees. See the following web page for the complete policy: http://www.rainforest-alliance.org/about/integrity/whistleblower