



Conflict of Interest Policy

Rev. 1.0

The Senior Management Team of OPG has implemented the following policy regarding the identification and mitigation of conflicts of interest.

All conformity assessment activities, including performance of conformity assessments and certification decisions, will be made in a manner that precludes conflicts of interest and which ensures full impartiality. In a practical manner, this means:

1. Potential clients will undergo an intake risk assessment to determine if conflicts exist which would prohibit OPG from providing conformity assessment services.
2. All staff and subcontractors, including new hires, will undergo a conflict of interest disclosure and risk assessment to determine if conflicts exist which would prohibit or limit their ability to perform conformity assessment related work.
3. Conflict of interest risk calculations will be performed to identify insurmountable conflicts and threats to impartiality; in such cases, persons will not perform conformity assessment services, or OPG will decline work. Where conflicts of interest may be mitigated, formal mitigation plans are developed and implemented; the effectiveness of these plans is then reviewed periodically to ensure effectiveness and compliance.
4. Employees, staff, and subcontractors involved in conformity assessment activities, including assessments and certification decisions, shall be prohibited from engaging in the following activities:
 - **Self-dealing:** participating in any individual actions with the intent of personal enrichment or the financial benefit of friends or family which would, in any way, bring doubt on the validity of conformity assessment services and certification decisions.
 - **Yielding to pressure:** succumbing to external influences including threats, bribes, acceptance of gifts, or any other actions by a third party intended to, or appearing to, influence the results of conformity assessments or certification decisions.
 - **Cross-Company conflicts:** where clients of a related company have received services which may create conflicts of interest with OPG conformity assessment services, then OPG will decline to provide such services.