

## CDP Scoring Conflict of Interest Policy

Revised February, 2016

CDP's primary concern is the fulfillment of its charitable mission and our independence and integrity as an unbiased reporter of information through responses to its periodic questionnaires is of paramount importance. In order to minimize the risk of conflicts of interest:

1. All questionnaire responses submitted by respondents may only be amended by them, or to their instruction or by the CDP Technical team to ensure a complete and clear data set after scoring has taken place.
2. Organizations carrying out scoring on behalf of CDP must be approved by CDP, and must successfully complete CDP's training programme, put in place an internal quality assurance process to ensure the methodology is being applied consistently, and must submit scores to CDP for final quality assurance before publication.
3. Organizations carrying out assessments on behalf of CDP must treat all entities that are being assessed equally, irrespective of whether the entity is their funder, client or competitor. To this end:
  - a. Before commencing scoring, all organizations will be required to disclose details of relationships with clients, funders or competitors within the sample of companies scored. Alternatively, they make a declaration that they have not provided response preparation or response check services, or otherwise satisfy CDP that the possibility of conflicts of interest has been minimized.
  - b. Where a scorer has supported a responding company on wording and/or writing up the response to CDP's information request this company will be removed from the scorer's sample and scored by a different scoring team.
  - c. Where a scorer is working with a responding company in any other capacity that could influence the scorer's objectivity, CDP will quality assure all or a proportion of these responses (depending on the size of scored sample).
  - d. If there is any basis for concern about their impartiality, CDP will either apply additional quality assurance checks to the scores, or remove any affected companies from the sample and make other arrangements for scoring those responses.
  - e. An individual who has any involvement in response check or response preparation services must not have any involvement in or influence over scoring that company's response.
  - f. If it is discovered that a scoring organization is not being even-handed in its approach, this will lead to an immediate termination of the relationship with that organization and correction of any scores affected.
4. CDP's Technical Team has ultimate responsibility for developing the scoring methodology in a way which furthers CDP's mission, takes into account scientific knowledge on environmental issues, and treats responding companies fairly. The technical team must balance these factors and make an independent decision on them, therefore it does not have any fundraising or account management responsibilities, since this separation minimises potential conflicts of interest. All CDP staff including those with direct fundraising and account management responsibilities are able to contribute to the technical development of the scoring however the final sign off lies with the Technical Team. In cases where CDP staff with fundraising responsibilities are involved in the scoring process strict quality assurance procedures will be applied to ensure impartial treatment of companies' responses.
5. CDP or CDP's scoring partners will not accept funding where the objective of such funding would be to affect any scoring decisions made of a particular response to CDP questionnaires. This ruling will apply equally to grants, sponsorship, sale of services or any other income.
6. Any attempt by any member of staff or Trustee to amend responses or influence scoring methodologies or scoring results, or assist any other party in doing so for personal gain, will be regarded as gross misconduct and will result in instant dismissal without compensation.