

## FOREST CERTIFICATION INTEGRITY POLICY

At Willenskraft Business Services Pvt. Ltd. (WBSPL), provide independent, reliable, and credible forest certification services that fully comply with the principles laid down in ISO/IEC 17065. The integrity of forest certification process is essential to building trust among stakeholders, ensuring compliance with EUDR, environmental standards, and promoting sustainable forest management practices.

To uphold this commitment, WBSPL adopts the following principles:

- **Independence and Impartiality**

WBSPL shall function independently in all its certification activities, ensuring that all certification decisions are made without any internal or external pressure that could influence the outcome. This independence is crucial to maintaining the credibility of our certification services.

- **Separation from Consultancy and Advisory Services**

WBSPL shall not undertake any commercial, consultancy, or advisory services that may compromise or be perceived to compromise the impartiality of our certification activities. This includes, but is not limited to, providing tailored solutions, implementation support, or offering advice to clients on how to meet certification requirements.

**This separation is critical to:**

- **Preserve Objectivity:** Objectivity forms the foundation of a credible forest certification system, and by remaining independent, WBSPL ensure that certification decisions are made based on evidence and compliance with applicable standards, rather than outside influence.
- **Avoid Conflicts of Interest:** WBSPL recognize the importance of avoiding conflicts of interest, which may arise when a certification body evaluates a forest management system or process it has helped to design or implement.
- **Maintain Stakeholder Confidence:** By ensuring that our services remain free from bias or external pressure, WBSPL sustain stakeholder trust in

our ability to assess compliance strictly based on established forest management standards.

- **Commitment to Impartiality**

All personnel involved in certification activities at WBSPL are bound by a firm commitment to impartiality. They are prohibited from holding any financial or other interests in the outcomes of the certifications they assess, ensuring that their decisions are objective, consistent, and reliable.

- **Risk Assessment and Mitigation**

The management of WBSPL conducts regular risk assessments related to impartiality and implements necessary controls to eliminate or minimize any identified threats. This includes reviewing processes, evaluating personnel, and ensuring that there are no conditions that could potentially compromise the integrity of the certification process.

Through this policy, WBSPL affirms its role as a neutral third-party certification body, committed to delivering forest certification services with professional integrity, technical competence, and transparency. WBSPL aim to support sustainable forest management and development goals in alignment with international best practices and the standards set forth for forest certification.

## **WBSPL CERTIFICATION INTEGRITY PROCEDURE**

1. **WBSPL shall uphold the integrity, impartiality, and credibility of its certification** activities throughout the entire certification process. This includes ensuring that all certification operations are conducted independently, fairly, and in alignment with internationally recognized standards such as ISO/IEC 17065 and IFWCS PRAMAAN standards.

This procedure applies to all categories of certified operators under the IFWCS PRAMAAN certification system, including individual clients, farmer groups, wood processing industries, handlers, and traders. It governs the full certification lifecycle — from application, evaluation, and surveillance to labelling, marketing, and post-certification monitoring.

To ensure the credibility and integrity of the certification system, WBSPL shall:

- Require all operators to sign a binding Certification Agreement, committing to full compliance with PRAMAAN standards.

- Implement risk-based and impartial certification decisions through independent committees.
- Monitor and control the use of the PRAMAAN name and logo to prevent misuse or misrepresentation.
- Conduct announced, unannounced, and trigger-based audits as part of its surveillance strategy.

## 2. Roles and Responsibilities for Certification Integrity

To uphold the integrity, impartiality, and credibility of the certification process, WBSPL clearly defines the following roles and their responsibilities:

ROLE	RESPONSIBILITIES
<b>Certification Committee</b>	<ul style="list-style-type: none"> <li>• Reviews audit and evaluation reports impartially.</li> <li>• Makes evidence-based decisions regarding granting, suspension, or withdrawal of certification.</li> </ul>
<b>Inspector/Auditor</b>	<ul style="list-style-type: none"> <li>• Conducts announced and unannounced field inspections.</li> <li>• Verifies on-site practices against PRAMAAN standards.</li> <li>• Collects samples and maintains documentation of compliance.</li> </ul>
<b>Technical Reviewer WBSPL</b>	<ul style="list-style-type: none"> <li>• Cross-verifies auditor findings for accuracy and completeness.</li> <li>• Evaluates technical compliance with relevant standards.</li> <li>• Recommends certification decisions or corrective actions.</li> </ul>
<b>Compliance Officer</b>	<ul style="list-style-type: none"> <li>• Monitors correct use of WBSPL and PRAMAAN logos.</li> <li>• Reviews WBSPL website, packaging, and marketing claims.</li> <li>• Identifies and reports misuse or non-compliance in public communications.</li> </ul>
<b>Operator</b>	<ul style="list-style-type: none"> <li>• Ensures compliance with all certification and legal requirements.</li> <li>• Maintains accurate records and documentation.</li> <li>• Cooperates fully during inspections and throughout the certification cycle.</li> </ul>

**3. Upon signing the Certification Agreement with WBSPL**, each operator formally agrees to adhere to the following mandatory responsibilities to maintain certification integrity under the PRAMAAN standards:

### Legal and Financial Compliance

- Operators shall consistently comply with all PRAMAAN standards and WBSPL's certification procedures throughout the certification period.
- Timely payment of all applicable certification fees, as outlined in the agreement, is mandatory.
- In the event of suspected contamination, WBSPL reserves the right to send samples for testing at an NABL-accredited laboratory. The operator will be responsible for covering the cost of such tests.

### PRAMAAN System Integrity

- Clear physical and documentary segregation between WBSPL and PRAMAAN-certified and non-certified/conventional production shall be maintained at all stages—cultivation, processing, storage, and transportation.
- Genetically Modified Organisms (GMOs) and any prohibited substances are strictly banned from all certified operations, including inputs and processes.
- Products that have not yet received certification approval shall not be labelled, sold, or promoted as PRAMAAN-certified under any circumstances.

### Inspection Access and Support

- Operators shall provide full and unrestricted access to WBSPL auditors for both scheduled (announced) and surprise (unannounced) inspections or sampling visits.
- The operator or a responsible and informed representative shall be available during inspections to provide assistance and clarification.
- **The operator shall grant access to:**
  - Fields, forest areas, or production sites
  - Storage facilities and warehouses
  - All required documentation and records
  - Relevant personnel or subcontractors involved in certified activities

## 4. Labelling and Claims

- All labels, printed materials, packaging, or advertisements featuring the WBSPL name, PRAMAAN logo, or related certification claims shall receive prior written approval from WBSPL.
- Certified logos and marks may only be used on products that are fully approved and within the scope of certification.

- Any unauthorized use of logos, misleading product claims, or false labeling practices will result in immediate investigation and potential sanctions, including suspension or withdrawal of certification.

## 5. System Changes and Group Management

- **Operators are required to notify WBSPL in writing without delay in case of:**
  - Revisions to the Annual Production Plan
  - Changes to landholding, processing units, or types of inputs used
  - Any contamination incidents or situations that may compromise certification integrity
- **Group Certification Requirements:**
  - New members can only be proposed for certification after at least one internal inspection has been conducted.
  - WBSPL shall be informed in advance before new members are included in the certification process.

## 6. Compliance and Enforcement

- Operators shall accept and implement any decisions made by WBSPL regarding non-compliance, which may include:
  - Corrective Action Requests (CARs)
  - Official warnings or notices
  - Reduction in the scope of certification
  - Suspension or complete withdrawal of certification
- Attempting to influence certification outcomes through political pressure, bribery, or third-party interference is a serious violation and may result in immediate disqualification from the certification program.

## 7. WBSPL ensures the integrity, impartiality, and effectiveness of the PRAMAAN certification system through the implementation of robust control measures. Each control area aligns with specific requirements of ISO/IEC 17065 to maintain the credibility of the certification process from application through ongoing surveillance.

CONTROL AREA	DESCRIPTION
<b>Contractual Binding</b>	All operators shall enter into a legally binding Certification Agreement that defines their obligations and WBSPL's authority.
<b>Impartial Decisions</b>	Certification decisions are taken by an independent Certification Committee based solely on objective evidence—auditors are not involved in final decisions.
<b>Surveillance</b>	Certified operators are subject to annual inspections and additional unannounced audits. Risk-based surveillance is applied in response to complaints or prior non-compliances.
<b>Record Review</b>	The audit process includes a thorough examination of all critical records such as input purchases, harvest logs, processing records, and sales documents.
<b>Logo Monitoring</b>	WBSPL regularly monitors the use of its logo and PRAMAAN certification mark on products, packaging, and marketing materials to prevent misuse.
<b>Sanction Process</b>	A tiered penalty system is implemented based on the type, severity, and recurrence of non-compliances. Sanctions may range from warnings to withdrawal of certification.
<b>Appeals &amp; Complaints</b>	A structured and transparent process is available to operators for lodging appeals or complaints. Each case is reviewed by WBSPL fairly and independently.

In the event of a violation of PRAMAAN standards or WBSPL's integrity rules, sanctions will be imposed based on the nature, severity, and recurrence of the non-compliance. These sanctions aim to uphold the credibility of the certification process while ensuring a fair and proportionate response.

## 8. Types of Sanctions:

1. **Corrective Action Requests (CARs):** Issued for minor non-compliances. The operator shall take corrective actions within a specified timeframe. A follow-up audit or verification may be conducted to ensure compliance.

2. **Warnings or Formal Notices:** Issued for non-compliances that do not immediately impact certification status. These serve as a formal reminder, requiring the operator to prevent further issues.
3. **Suspension or Scope Reduction:** Applied when there are significant non-compliances or failure to resolve CARs. This may include temporary suspension of certification or reduction in the scope of certification (e.g., excluding specific products).
4. **Withdrawal of Certification:** Enforced for serious breaches, such as deliberate fraud, repeated non-compliance, or misrepresentation. The operator's certification is revoked, and they shall immediately cease all use of the PRAMAAN logo and certification.
5. **Legal or Financial Recovery:** In cases of fraud or intentional violations that cause reputational damage, legal action or financial recovery may be pursued.

#### **Sanction Governance:**

- **Review and Approval:** All sanctions shall be reviewed by WBSPL and formally approved by the Certification Committee to ensure impartiality.
- **Notification:** The operator will be informed in writing of the sanction, including the justification, corrective actions (if applicable), and any required timelines.
- **Appeals Process:** Operators have the right to appeal against sanctions through the formal documented appeal procedure, ensuring transparency and fairness.

## **9. Confidentiality and Impartiality**

WBSPL ensures the protection of operator information and guarantees fair, unbiased decisions through the following measures:

- **Confidentiality Agreements:** All staff members and contractors are required to sign confidentiality agreements to safeguard operator information.
- **Impartiality Committee:** An Impartiality Committee is established to oversee and monitor any potential conflicts of interest, ensuring that all certification decisions remain impartial.
- **Balanced Decision-Making:** WBSPL maintains a decision-making process where no single stakeholder group holds excessive influence, preserving the fairness and integrity of the certification process.

**10. WBSPL ensures proper documentation of all critical records to maintain transparency, accountability, and evidence of compliance.**

These records are retained for a specified period and are accessible for internal reviews, appeals, or accreditation audits.

RECORD TYPE	RETENTION PERIOD	RESPONSIBLE DEPARTMENT
Certification Agreements	5 years post-certification	Admin Department
Audit Reports	5 years	Audit Department
Sanction Records	5 years	Certificate Office
Input Approvals	5 years	Technical Reviewer (WBSPL)

**11. Purpose of Retention:**

These records provide essential evidence during internal reviews, handling appeals and conducting accreditation audits to verify that all certification processes comply with relevant standards and regulations.

WBSPL is committed to the ongoing effectiveness and relevance of its certification procedures. To ensure that the process remains aligned with the evolving standards and feedback, WBSPL reviews its procedures regularly. The review process occurs annually or sooner if any of the following conditions arise:

- **Updates to PRAMAAN or ISO/IEC 17065 Standards:**
  - Any changes or updates in the PRAMAAN standards or the ISO/IEC 17065 certification guidelines that affect certification operations will trigger a review of the procedures to ensure compliance with new requirements.
- **Internal Audits Reveal Areas for Improvement:**
  - The internal audit process identifies opportunities to enhance certification practices, address inefficiencies, or improve the overall integrity and effectiveness of the system. These insights will lead to procedural adjustments or upgrades.
- **Stakeholder Feedback or External Complaints Identify Procedural Gaps:**



- WBSPL takes feedback from stakeholders (such as certified operators, auditors, and external partners) seriously. If feedback or external complaints highlight WBSPL's weaknesses or gaps in the procedure, WBSPL will evaluate and improve the certification process accordingly.
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