



Green Key's policy on impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption

1. INTRODUCTION

This Green Key Policy on impartiality, objectivity, confidentiality, non-discrimination, anti-bribery and anti-corruption takes effect on 1 October 2026 and replaces all former policies in Green Key on the same matters.

2. TARGET GROUP

This Green Key Policy must be followed by the establishments participating in the Green Key programme (including the employees, the cooperation partners, the consultants, and the suppliers of the establishments).

All FEE international and national member organisation staff working with Green Key must as well follow this Green Key Policy.

This Policy also applies to the third-party auditors (and their respective auditing companies) used by Green Key as well as the staff in the Certification Body.

Finally, this Policy also applies to any other relevant partners and persons affiliated with Green Key at the national and international level.


3. GREEN KEY'S COMMITMENT TO IMPARTIALITY IN ALL ITS ACTIVITIES

The persons described in the target group above must act impartially in relation to all Green Key related activities. Green Key does not allow any personal, commercial, financial interests and/or pressures to compromise impartiality.

The Green Key staff, the third-party auditors and technical staff of the Certification Body must not have worked in any capacity, including consultation, for the Green Key applicant or certified establishments within the past two years.

Green Key staff in contact with participating establishments are able to provide general information and support that enables these establishments to strengthen their sustainability





actions and to improve their understanding of how to conform with the Green Key requirements. However, the Green Key staff will not give prescriptive advice to participating establishments. Green Key staff are not allowed to have any companies, partners or other persons influencing their impartiality and still work with Green Key.

Third-party auditors used by Green Key must fulfil and follow Green Key's requirements in relation to their function and work as auditors for Green Key. The auditors can, at the end of a certification audit, provide general information about the findings during the audit, but cannot give direct information or provide promises related to the Green Key certification. The auditors are not allowed to have any companies, partners or other persons influencing their impartiality and still work as Green Key auditors.

Technical staff of the Certification Body must fulfil and follow Green Key's requirements in relation to their function and work on certification review and decision as well as their function and work with auditors. The staff of the Certification Body are not allowed to have any companies, partners or other persons influencing their impartiality and still work in the Certification Body.

Any other relevant partners or persons affiliated with Green Key at the national and international level must not influence the participating establishments, Green Key staff, third-party auditors and the staff of the Certification Body in relation to their work with Green Key.


4. GREEN KEY'S COMMITMENT TO OBJECTIVITY IN RELATION TO ITS ACTIVITIES

The Green Key staff, the third-party auditors and the staff of the Certification Body and any other relevant partners or persons affiliated with Green Key at the national and international level must work with Green Key objectively regarding the programme activities and the participating establishments.

The Green Key staff, the third-party auditors and the staff of the Certification Body are only allowed to conduct the activities as described for each type of entity. It is not permissible to change the scope of their activity or for them to require that the participating establishments must accept additional activities/services outside the scope of their activity for Green Key.

5. GREEN KEY'S COMMITMENT TO CONFIDENTIALITY IN RELATION TO ITS ACTIVITIES

The Green Key staff, the third-party auditors and the staff of the Certification Body and any other relevant partners or persons affiliated with Green Key at the national and international level must work with Green Key in confidentiality respecting Green Key's programme activities and the participating establishments.



All information about the participating establishments received ahead of the certification, received or observed during any audit must be treated with confidentiality and not used for purposes other than those agreed upon with the participating establishments.

Personal information must be treated as sensitive information and stored safely, according to national and international data protection legislation. Any individual can request information about their personal information or request that it be deleted.

In connection with complaints and appeals, Green Key will request information about the complainant/appellant and accepts that the information is treated with confidentiality regarding the entity under complaint/appeal.

6. GREEN KEY'S COMMITMENT TO BE A NON-DISCRIMINATORY PROGRAMME

Green Key is eligible for applications from establishments falling within the definition of any of its six categories in Green Key and accepted after the pre-screening process.

Green Key does not discriminate against any interested or participating establishment regardless of its location subject to their eligibility (Green Key is offered worldwide, except USA and Canada).

Green Key does not discriminate against any interested or participating establishment regardless of its size or type, the customers it attracts, or its contact persons and employees (their origin, religion, age, sex, etc.), subject to the establishment's eligibility.

Green Key does not accept any discrimination against any interested or participating establishment, of or by the Green Key staff, the third-party auditors or the staff of the Certification Body.

7. GREEN KEY'S COMMITMENT IN RELATION TO BRIBERY AND CORRUPTION

Green Key does not accept any bribery or corruption received or occurring in connection with any Green Key related activities. This means that the staff of the participating establishments, the Green Key staff, the third-party auditors, the staff of the Certification Body and any relevant partners, suppliers, authorities or other entities connected with the Green Key programme are not allowed to participate in any bribery and/or corruption related activities.

8. ACTIONS IN RELATION TO VIOLATION OF THIS POLICY

If any violation of this policy is observed or reported related to the performance of any persons or entities in the target groups, Green Key must ensure an immediate follow-up.

Any violation of the policy will be treated in the same way as a complaint (see Green Key's Policy on complaints and appeals). This refers to any violation of the policy at the level of the



establishment, the Green Key staff, the third-party auditor, the staff of the Certification Body or any other persons or partners related to the Green Key programme.

