



POLICY ON SAFEGUARDING IMPARTIALITY		Doc No.: POL-2.1.1.1
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1	Aims	This policy aims at having a mechanism for safeguarding impartiality in all activities related to certification
2	Background	Private certification involves several immanent conflicts of interest. The key point is a certain conflict of interest could arise among personnel involved in various stages of certification which could affect the certification process.
3	Normative 5.2 framework	ISO 17065:2012 Clause
4	Terms	None
5	Policy	
5.1	Exclusion:	<input type="checkbox"/> ADITI inspectors and certification officers may not perform inspection, or make or influence in certification decisions in case of operators, <ul style="list-style-type: none"> ○ Who are their relatives or personal friends ○ Who are or have been their employees or employers, or for whom they have worked as external consultants ○ with whom they have or have had any kind of personal conflict, not directly related to inspection/certification issues. <input type="checkbox"/> An inspector must not control the same operation for more than three consecutive years, without external supervision or an independent inspection performed by another inspector to the same operator.
5.2	5.2.1	<p>ADITI shall have a mechanism for safeguarding its impartiality, which would focus on</p> <p>a) The policies and principles relating to the impartiality of ADITI's certification activities;</p> <p>b) Any tendency on the part of ADITI to allow commercial or other considerations to prevent the consistent impartial provision of certification activities;</p> <p>c) Matters affecting impartiality and confidence in certification, including openness.</p> <p>This mechanism could also include other tasks or duties (e.g. taking part in the decision-making process), provided these additional tasks or duties do not compromise ADITI's essential role of ensuring impartiality.</p> <p>Also a single mechanism for several certification schemes can satisfy this requirement.</p> <p>5.2.2</p> <p>The mechanism shall be formally documented to ensure the following:</p> <p>a) A balanced representation of significantly interested parties, such that no single interest predominates (internal or external personnel of ADITI are considered to be a single interest, and shall not predominate);</p> <p>b) Access to all the information necessary to enable ADITI to fulfill all its functions.</p> <p>Input that is in conflict with the operating procedures of ADITI or other mandatory requirements should not be followed. Management should document the reasoning behind the decision to not follow the input and maintain the document for review by appropriate personnel.</p> <p>5.2.4</p> <p>Although every interest cannot be represented in the mechanism, ADITI shall identify and invite significantly interested parties.</p> <p>These interests can be limited, depending on the nature of the certification scheme.</p>

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5.3	<p>According to European Commission (EN ISO 14065), below points outlines the areas which ADITI shall address when establishing a process to ensure continued impartiality and independence</p> <ul style="list-style-type: none"> □ ADITI shall regularly review its impartiality policy document and assess whether that policy is practicable and ADITI's impartiality policy is made available to the public. □ ADITI shall ensure that it has a formal process in place to analyze and manage potential risks to impartiality and that this process is appropriate and effective. The process is described in the ADITI Quality Manual and ideally: <ul style="list-style-type: none"> Address the Onsite/Client Company relation level, Verification Opinion review level, Company policy level Apply to all staff/advisory committee members/senior management that are directly or indirectly involved in the verification process; Be monitored by top management of ADITI Be regularly reviewed by the impartiality committee or any other mechanism in place to ensure continued impartiality; Include a declaration of business relationships with clients; <ul style="list-style-type: none"> Address how ADITI manages risks involved when contracting work out to non-staff personnel (contracted personnel are often also consultants which can entail a potential risk to impartiality); Address how ADITI manages financial risks; the risks for ADITI is increased if ADITI is dependent on income from a small number of large clients that could exert undue influence; Address the company's financial soundness: a financially sound company should not be totally dependent on a 'successful verification' and should minimise the risk involved; Ensure that other (potential) risks are identified, analysed, recorded and rated; and that actions are taken to mitigate these risks. □ ADITI shall ensure the following with regard to Impartiality Committee: <ul style="list-style-type: none"> There is evidence of meetings of the impartiality committee (or equivalent oversight mechanisms); There is evidence of agenda points/ minutes demonstrating that the issue of impartiality was discussed in relevant senior level meetings; including review of the oversight process itself, outcomes of analysis of potential risks (e.g. from large client accounts), and that pro-active actions was taken to manage impartiality and independence risks etc.; There is a written impartiality company policy and that the impartiality committee (or equivalent mechanism) has been made aware of its responsibilities in this area – e.g. there should be relevant terms of reference; The impartiality committee or equivalent oversight mechanism contains members that are not employees of ADITI (i.e. they should have an independent viewpoint on the activities of the verifier itself); The committee members or members of an equivalent mechanisms are sufficiently competent and experienced to supervise the impartiality of ADITI, its personnel, related organisations and contracted persons; The committee members or members of an equivalent mechanism have access to the relevant information, are properly informed, and are free to investigate/ enquire wherever they consider relevant; The outcomes of the committee's or equivalent mechanism's evaluations and meetings are reported to senior executive management for action; and the actions taken and outcomes are reported back to the impartiality committee or equivalent mechanism for their response/challenge. □ ADITI shall ensure the following with regard to Independent review of verification work: <ul style="list-style-type: none"> There are statements in ADITI's quality manual on the requirements for independent review in this area and competence of independent reviewers; Formal statements in relation to confidentiality, impartiality and independence are included in contracts or other signed statements; The independent reviewer has confirmed the inclusion of impartiality concerns in the team selection process and as part of the formal strategic review and risk analysis tasks; That verifier's files contain evidence showing the implementation of the company impartiality and independence policies (including the independence of the person conducting the internal 	
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		<p><input type="checkbox"/> ADITI shall ensure the following with regard to Independence of the verification team onsite/contact with client:</p> <p>The tasks related to contract review, strategic and risk analysis include a formal assessment of the independence to account for changing circumstances over time (e.g. in the period between submitting a proposal and the commencement of the work: the impartiality and independence status of a selected team member in the pre-contract stage could have changed during the verification, so each team member's status should be considered again at the strategic analysis and risk analysis stage). There should thus at least be a confirmation that an assessment was made to ensure impartiality/ avoidance of a conflict of interest and that no issues or conflicts were identified or, if issues were identified, documentation of the issue concerned and the measures taken;</p> <p>There are signed statements/ declarations on impartiality and independence by the individual auditors and other staff involved in the verification;</p> <p>files contain evidence of implementation of the stated impartiality policy;</p>
6	Access to this policy	<p><input type="checkbox"/> This policy is available to all interested parties</p> <p><input type="checkbox"/> It must be handed out to all ADITI certification and inspection personnel</p>

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