

# KQC Impartiality Policy

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| Operations and Technical Manager |             | Director, Operations         |

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## 1. Purpose

The purpose of this policy is to set the parameters for the KQ Certification Limited (KQC) Certification Body to manage its impartiality effectively and convey confidence to stakeholders that rely on the safety of its Certifications and assessments for their interests.

## 2. Scope

The scope of this policy applies to KQC, its employees, contracted third parties, subcontractors (if used), clients and stakeholders. All are required <sup>1</sup> and expected to abide by the provisions of this policy that are reasonably applicable to them.

<sup>1</sup> Non contracted Stakeholders are encouraged to abide by the provisions of this policy.

## 3. Definitions

Please refer to the KQC Quality Manual (M001) Annex 01 for the current definitions that relate to KQC Management System.

## 4. Responsibility and authority

| Responsibility                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Director, Operations<br>Director, Commercial | The Directors have ultimate authority for approval of the Certification Body's Impartiality Policy and decisions related to it.                                                                                                                                                                                                                                                                                                                               |
| Operations and<br>Technical Manager          | The Operations and Technical Manager has responsibility for the definition of the Certification Body's Impartiality policy, processes, and controls. In addition, the Operations and Technical Manager has responsibility for coordinating the implementation of the Certification Body's Impartiality policy, processes, and controls.                                                                                                                       |
| Employees                                    | Employees are each individually responsible, relative to their role, for the implementation of the Certification Body's Impartiality policy, processes, and controls.                                                                                                                                                                                                                                                                                         |
| Contractors                                  | Individual Contractors are each individually responsible, relative to their role, for the implementation of the Certification Body's Impartiality policy, processes, and controls.                                                                                                                                                                                                                                                                            |
| Sub-contractors                              | Subcontracting organisation, if used, are responsible, relative to their role, for the implementation of the Certification Body's Impartiality policy, processes, and controls.                                                                                                                                                                                                                                                                               |
| Clients                                      | All clients are responsible for alerting the Certification Body to any potential impartiality or conflict of interest issue that they become aware of.                                                                                                                                                                                                                                                                                                        |
| All Stakeholders                             | Stakeholders that are contracted to the Certification Body are responsible for the implementation of the Certification Body's Impartiality policy, processes, and controls, in accordance with their contract.<br><br>Stakeholders that are not contracted to the Certification Body are encouraged to alert the Certification Body's Operations and Technical Manager to any potential impartiality or conflict of interest issue that they become aware of. |
| Impartiality Committee                       | The Impartiality Committee has responsibility to meet, review matters of impartiality and make recommendations related to impartiality under its agreed Terms of Reference.                                                                                                                                                                                                                                                                                   |

| Authority                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Director, Operations<br>Director, Commercial | The Directors jointly have ultimate authority for the implementation of processes and controls that reflect the organisation's Impartiality Policy (this document). This authority may be delegated to the Operations and Technical Manager as required.                                                                                                                                                                                                                                                                  |
| Operations and Technical Manager             | The Operations and Technical Manager, under the authority of the Directors, has operational authority for the implementation of processes and controls that reflect the organisation's Impartiality Policy (this document).                                                                                                                                                                                                                                                                                               |
| Impartiality Committee                       | <p>The Impartiality Committee has authority for reviewing matters of impartiality and making recommendations to the Management Board of the Certification Body.</p> <p>Where the management has referred a matter of impartiality to the Impartiality Committee for decision the Impartiality Committee's decision will be implemented by the Management Board of the Certification Body or a rationale provided for the reason not to implement the decision, together with a risk assessment of the position taken.</p> |

## 5. Reference documents

| Document number  | Document title                                                                                                                 |
|------------------|--------------------------------------------------------------------------------------------------------------------------------|
| ISO 17021-1:2015 | Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements |

## 6. Policy

### 6.1 Introduction

KQC recognise that the aim of Assessment and Certification of management systems is to provide confidence to all interested parties that a management system fulfils the specified requirements of the Standard(s) it is Certified to and/or provides an objective assessment against the audit criteria specified. This Policy is supported by the KQC Impartiality process (SP504).

### 6.2 Interested parties

Parties that can have an interest in Certification and assessment, include:

- Employees and contractors of a Certified or assessed organisation
- Employee Groups (including unions and cooperatives)
- Subcontractors to a Certified or assessed organisation
- Suppliers to a Certified or assessed organisation
- Owners and Shareholders of the organisation
- Clients of Certification or assessed bodies
- Customers of Certified or assessed organisations
- Society (including the local neighbourhood), visitors to the organisation, workers families.
- Government, legal and regulatory authorities
- Consumers and society
- Active societal groups (e.g. Environmental)
- Professionals interacting with the organisation (e.g. including Academics, Occupational Health and Safety, Environmental, Healthcare and Medical).

- Non-Governmental Organisations (NGOs), industry Groups and Associations.

### 6.3 Employee and contractor responsibility

All employees of KQC, and contractors to KQC are required to perform the duties and activities of their position with the highest level of integrity and independence, in a professional and ethical manner, recognizing their responsibility to multiple stakeholders.

They must also ensure that they avoid or eliminate any actual conflict of interest or situation that could be perceived as a conflict of interest and immediately report it to their line Manager.

Each of our employees and associates has responsibility for complying with this policy, our processes, procedures, guidelines and agreements with regard to impartiality.

Failure to comply may result in disciplinary action, up to and including termination of employment, or termination of contract for contractors.

### 6.4 Objective and fair assessment

KQC provide an objective and fair assessment through their and certification process. Impartiality is a core value of the organisation.

KQC uses relevant processes, procedures, and controls to safeguard the impartiality of its activities. We strive to deliver assessments and Certification, where objectively justified, that provide confidence to the market and our stakeholders.

### 6.5 Impartiality Committee

To provide independent assessment of the Certification Body's operation, controls for impartiality and impartiality situations the organisation maintains an Impartiality Committee, with defined terms of reference. The Impartiality Committee operates in accordance with Impartiality Committee process (SP504-1).

The independent Impartiality Committee seeks to ensure sufficient weight and importance is attached to maintaining objectivity and impartiality in the strategy and operations of the Certification body. The Impartiality Committee has been appointed by the Directors of the organisation with the remit to monitor all aspects of business activity.

Members of the Impartiality Committee are appointed to represent the interests of the parties that they represent or bring specialist skills (such as industry sector, risk assessment, accreditation, or certification expertise) to the committee for the benefit of the organisation and its stakeholders.

### 6.6 Threats to Impartiality

In operating as a Certification Body, we recognise that there are threats to our impartiality. Whilst it is impossible to anticipate all the potential threats the following threats are highlighted:

- **Self-interest** – Where a threat arises from an individual, group of individuals or body acting in their own interest, limiting objectivity.
- **Non independent review** – Where a non-independent review is conducted of work completed, potentially limiting the objectivity of the review.
- **Familiarity** – Where threats that arise from an individual, group of individuals or body being overly familiar with, or basing their compliance or effectiveness conclusions on prior knowledge or supposition as opposed to a review of objective evidence to support conclusions made.

- **Influence** – Where a threat arises from a person, group of individuals, or body directly, indirectly or can be perceived as seeking to influence assessment conclusions or Certification through pressure on those acting for the Certification Body.

The threats to impartiality are identified, analysed, actioned, and captured under the Risk assessment process (SP504-2).

#### 6.7 Conflicts of Interest

A conflict of interest occurs when an individual's personal interests or relationships interfere with their professional obligations or judgment. In assessment and Certification terms this may be in the form of an individual or Group of individuals performing assessment activity, including Certification decision making, for an entity they have a close business or personal relationship with.

The processes, procedures and controls that KQC employ to uphold impartiality are designed to recognise and eliminate actual or potential conflicts of interest. The following scenarios are recognised as a conflict of interest:

- Auditing an organisation where the auditor or decision maker has provided consultancy support or other services.
- Auditing an organisation where the auditor or decision maker has been employed or contracted to the organisation.
- Auditing an organisation where the auditor, a family member or friend has an interest.
- Making an assessment or Certification decision where the auditor, family member or friend has an interest.
- Accepting, directly or indirectly, any kind of personal advantage offered by the organisation or individual to be audited.
- Making a representation for the client organisation
- Giving preferential treatment to any supplier or other person doing business with KQC to serve their personal interest.
- Use their position or contacts from KQC to promote their personal interests or those of a family member or person with whom they have a close personal or professional relationship.

Although this policy details certain behaviours that may lead to a conflict of interest or the perception of a conflict of interest, it is impossible to anticipate all situations that could lead to one. Employees may also inadvertently find themselves in a situation that leads to or could be perceived as a conflict of interest. These situations must also be reported.

#### 6.8 Impartiality commitments and obligations

KQC makes the following unambiguous commitments as part of its policy to ensure impartiality in the provision of its assessment and certification services:

- Committing employees and contractors to conduct their work in accordance with the organisation's Code of Ethics
- Having full authority and taking full responsibility for all its assessment and Certification decisions
- Ensuring that its assessment and support staff act impartially and are perceived to be impartial.
- Require all personnel to register any conflicts of interest as defined by this policy.
- Ensuring its relationships with other individuals and bodies does not compromise impartiality.
- Ensuring that activities are not marketed or offered as linked with the activities of a management system consultancy.
- Always responding to threats to its impartiality with appropriate action to eliminate or mitigate the risk.

KQC equally shall not:

- Offer or provide management systems consultancy.
- Install, distribute, or maintain a product, process, or service, which is produced under a management system that it has certified.
- Offer or provide internal audits to its certified clients or those seeking its assessment or Certification.
- Outsource assessment or Certification audits to a management system consultancy.
- Use a member of staff, to assess an organisation, who has been active for the client organisation within the last two years from the date of the first day of the assessment.
- Certify the quality management system of another management systems certification body.

## 7. Records

Records in relation to Impartiality are maintained for a minimum of 7 years, in accordance with the Quality Records Policy P023.

| Revision Log |                                                                                                          |                                |
|--------------|----------------------------------------------------------------------------------------------------------|--------------------------------|
| Version #    | Description of Change                                                                                    | Release Date                   |
| 1.0          | Initial release                                                                                          | 6 <sup>th</sup> August 2024    |
| 1.1          | Updated document format, added potential threats and mechanisms, updated role titles                     | 22 <sup>nd</sup> November 2024 |
| 1.2          | Removed potential threats and mechanisms (moved to impartiality process). Updated references to KQC docs | 10 <sup>th</sup> February 2025 |
| 1.3          | Updated for clarity                                                                                      | 13 <sup>th</sup> August 2025   |