



**Document owner: General Manager**  
**Document approver: Director**

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**KQ Certification Ltd.**  
**Commercial Policy**

### 1.0 Purpose

This Policy document serves to set the commercial parameters that KQ Certification Limited operates within.

### 2.0 Scope

This policy applies to the full scope of KQ Certification operations, Certification activities and geographies in which it operates.

The Certification process offered by KQ Certification is applicable to manufacturing and service organisations, in public and private sectors, it is administered in a non-discriminatory manner and impartial manner no matter what the commercial arrangements and interests are.

The Certification process is designed to provide the client service of system assessment and Certification by assessing and monitoring the client’s definition and implementation of their management System in an objective and impartial manner, against the audit criteria defined.

KQ Certification’s management system is maintained in accordance with, the current requirements of:

- ISO/IEC 17021 series, including the management system requirements of 17021-1 - option A.
- IAF Mandatory Documents
- Accreditation body specific requirements

### 3.0 Responsibility and authority

Responsibility	
Director	The Director has ultimate responsibility for approval of the Certification Body’s Commercial Policy and decisions related to it.
General Manager	The General Manager has responsibility for the definition of the Certification Body’s Commercial policy, processes, and controls. In addition, the General Manager has responsibility for coordinating the implementation of the Certification Body’s Commercial policy.
Employees and contractors	Employees are each individually responsible, relative to their role, for the implementation of the Certification Body’s Commercial policy, processes, and controls.
Contractors and sub-contractors	Individual Contractors and sub-contractors have no authority with respect to the commercial arrangements that KQ Certification make, outside of the commercial terms on which they are engaged with KQ Certification.  These parties are required to respect that position.
Authority	
Director	The Director has ultimate authority for the implementation of processes and controls that reflect the organisation’s Commercial Policy (this document). This authority may be delegated to the General Manager as required.
General Manager	The General Manager, under the authority of the Director, has operational authority for the implementation of processes and controls that reflect the organisation’s Commercial Policy (this document). This extends to orientation of new recruits (employee and contract) to the organisation.

### 4.0 Reference documents

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

IAF Mandatory documents as applicable

Accreditation body specific requirements as applicable to the accreditation held.

## 5.0 Policy

KQ Certification's Commercial Policy role is to provide our clients with an impartial, objective and quality service, regardless of the commercial interest or terms which they engage in work with KQ Certification. The policy also sets the principles for the commercial business operations of KQ Certification, follows:

### 5.1 KQ Certification Personnel

All KQ Certification personnel, either internal or external, or committees who could influence the Certification activities, shall act impartially, and shall not allow commercial, financial, or other pressures to compromise impartiality.

### 5.2 Liability and financing

KQ Certification maintains adequate liability insurance coverage and reserves to address potential liabilities arising from its Certification activities.

KQ Certification Limited derives all of its financial support for operational activities from the Directors in 'start up' of the Certification Body and will transition to being self-funding from service revenues ongoing.

Capital projects are funded by the Directors and/or revenues from Certification services.

KQ Certification demonstrates to the members of its Impartiality Committee that initially, and on an ongoing basis, commercial, financial, or other pressures do not compromise its impartiality.

### 5.3 Operation of committees

The Directors and General Manager have the responsibility and authority for establishing and maintaining committees related to certification activities, either on a permanent or ad hoc assignment basis, to address issues related to certification activities identified by the organization itself, or by the Impartiality Committee. The Impartiality Committee is a permanent committee and operates according to the Impartiality Committee process (SP503-1).

The selection of committee members shall provide the assurance that these Committees are free from any commercial, financial, and other pressure that might influence decisions. The KQ Certification management shall be represented on all Committees.

## 6.2 Impartiality Committee (Mechanism for safeguarding impartiality)

In order to safeguard the impartiality of KQ Certification's activities, the Director and General Manager have assigned to Impartiality Committee the responsibility for providing the Certification Body with, information and advice on the following:

- The development of policy, processes and controls relating to the impartiality of KQ Certification's activities
- Matters affecting confidence in certification including transparency, openness, and public perception.
- Measures necessary to ensure the impartiality and independence of KQ Certification related to commercial and other considerations.
- The Certification process and sector specific considerations governing certification activities.
- The establishment of other committees, as required, to provide:
- Support for assignment where further specialist independent competence is required.
- Liaison between KQ Certification and other stakeholders
- Any tendency on the part of KQ Certification to allow commercial or other considerations that have the potential to compromise impartial provision of Certification activities.

The Impartiality Committee shall conduct a review at least annually of,

- The impartiality of the KQ Certification process
- The results of analysis of potential conflicts of interest arising from KQ Certification's operations and relationships

Other tasks or duties may be assigned to the Impartiality Committee by the Directors or General Manager of KQ Certification, with agreement of the Committee subject to not compromising the Committees essential role of ensuring impartiality (see SP503 – Impartiality process).

Although the Impartiality Committee cannot represent every interest, KQ Certification will aim to gain a balanced representation of interests based on its current scope of operations and interactions, without any single interest prevailing.

The terms of reference, duties responsibilities and authorities of the Impartiality Committee are documented (See Impartiality Committee process (SP503-1)).

### 6.0 Records

Records in relation to the management of Commercial Policy and Impartiality are maintained for a minimum of seven years, in accordance with the Records Management Policy P005.

Revision log		
Revision	Description of Change	Release Date
0.1	First draft	29th March 2024
1.0	Initial issue	29 <sup>th</sup> March 2024
1.1	Updated for readability	9 <sup>th</sup> May 2024