

Impartiality Policy

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1. Commitment

International Certification Trust Services (ICTS). is the legal entity responsible for certification activities; reference to ICTS in this Policy refers to these legal entities.

ICTS, its Directors, staff and sub-contractors fully understands the importance of impartiality in undertaking its Certification Activities. ICTS will therefore ensure that in all its dealings with clients or potential clients all employees or other personnel are and will remain impartial.

ICTS, its Directors and staff are fully committed to ensuring that all management system certification activities are impartial. Any relationships between ICTS or individuals employed by ICTS or sub-contractors to ICTS with other organisations or individuals will be declared, reviewed, documented and risk assessed.

In addition to a publically accessible statement (displayed at ICTS website), ICTS has detailed the functions of the Impartiality and Ethics Committee and its role in maintaining impartiality monitoring the laid down impartiality norms and its adequacy.

1.1. Avoidance of conflict of interest

ICTS has identified and analysed (risk assessed) all relationship (formal or informal) with other organisations or individuals which may result in a conflict of interest arising from its certification activities. ICTS conducts a risk assessment for all overseas offices as a part of its internal audit process. Should the company propose to enter into any relationship with another company or organisation or enter into any new area of business, that relationship or new area of business will be reviewed by the Impartiality and Ethics Committee to ensure that impartiality can be demonstrated and the integrity of the Certification process assured.

Periodically the Impartiality and Ethics Committee will review the activities of the company to ensure that impartiality continues to be demonstrated.

1.2. Existing or past relationships

Any conflict of interest arising from existing or past relationships between employees or sub-contractors and ICTS clients (including potential clients), is required to be declared. All staff and sub-contractors are made aware of the need to declare any such conflict of interest and sign to acknowledge the obligation (contract of employment and sub-contractor agreement).

Individuals or sub-contractors may have provided a consultancy service, internal audit services, been employed or through other means have an association with clients of ICTS, in such cases the individual will be required to declare any such current or past relationship and will not be allowed to undertake Audits or other work with that client. At the discretion of the Directors, the individual may be allowed to conduct an Audit or undertake other work with a client when a minimum of 2 years has elapsed since the end of the management system consultancy or other relationship.

Any such relationships or conflicts of interest will be recorded within the personnel records of the individual and the responsibility to declare any such conflicts stated in contracts of employment and sub-contractor agreements.

When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of ICTS requesting certification from its parent), then the certification is not provided as a policy decision.

1.3. Avoidance of conflict of interest in providing services

As required by ISO 17021, ICTS will not certify another certification body for its management system certification.

As required by ISO 17021, ICTS does not offer or provide management system consultancy.

ICTS does not offer to provide Internal Audits (nor has it) to any of its clients and does not provide an Internal Audit service to any company or organization.

ICTS as a company does not and has not provided a consultancy or Internal Audit service to its customers or potential customers therefore no risk to the impartiality of the Certification process is posed.

As required by ISO 17021, ICTS does not outsource Audits to a management consultancy organisation. Audits (and the use of technical experts) are only outsourced (sub-contracted) to individuals.

As required by ISO 17065, ICTS and any part of the same legal entity and entities under its organizational control shall not:

- ❖ Be the designer, manufacturer, installer, distributor or maintainer of the certified product;
- ❖ Be the designer, implementer, operator or maintainer of the certified process;
- ❖ Be the designer, implementer, provider or maintainer of the certified service;
- ❖ Offer or provide consultancy to its clients;
- ❖ Offer or provide management system consultancy or internal auditing to its clients where the certification schemes the evaluation of the client's management system.

As required by ISO 17024, ICTS shall adopt appropriate procedures when ICTS certifies a person it employs in order to maintain impartiality.

If ICTS has a relationship with other separate legal entities, these activities shall not compromise the impartiality of its certification activities.

If the separate legal entity offers or produces certified product or offers consultancy, ICTS's management personnel and personnel involved in certification review or decision shall not be involved in the activities of the separate legal entity.

1.4. Notification of potential conflict of interest situation

All personnel both internal and external are required to reveal any situation known to them that may present them or ICTS with a conflict of interest. This requirement will be established during the recruitment process and will also be an ongoing requirement of the individuals to declare such conflict of interest. The Directors will establish the nature of that possible conflict of interest and make a decision based upon the individual circumstance and will refer the matter to the Impartiality and Ethics Committee if required.

1.5. Independence

ICTS has no relationship (formal or informal) with any other company or organisation which may result in a conflict of interest arising from its certification activities. ICTS does not offer consultancy to any client or potential client, training other than general training courses such as Internal Audit etc.

ICTS does not in its marketing, publications, website, correspondence etc. state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organisation were used. ICTS has no links with any consultancy organisation nor does it approve consultancy organisations, however ICTS does maintain a list of consultants and will when asked by clients or potential clients to supply names of consultants who have requested that they are included on ICTS's list of consultants. When asked for names of consultants ICTS will supply those names (minimum of 3) providing a consultancy service on the basis that it is neither a recommendation nor a guarantee of expertise. Should ICTS become aware of any claims stating or implying that certification would be simpler, easier, faster or less expensive if a specified consultant was used it will be referred to the Managing Director for appropriate action.

Any threats to its impartiality arising from the actions of other persons, bodies or organisations will be referred to the Director and Impartiality Committee (if necessary) to determine the appropriate actions (including legal actions) to be taken.

2. Impartiality principles

- ❖ ICTS Certificates are only issued following a review by an independent authorised and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate.
- ❖ ICTS does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- ❖ ICTS does not offer (and has never offered) an internal audit service to its certified clients.
- ❖ ICTS does not own or have any interest (financial or otherwise) in any other company that offers certification or consultancy services.
- ❖ ICTS does not have (and will not form) any relationships with companies who offer consultancy or other services that can be construed as having an impact on the certification services provided by ICTS. Any proposed relationship between ICTS and any other company will undergo a risk assessment by the Impartiality and Ethics Committee prior to that relationship being formalised. Any current relationships with companies, organisations and individuals will be risk assessed on

a regular basis to ensure that the relationship does not impact upon the impartiality of the certification process.

- ❖ Individuals employed by or otherwise contracted to ICTS are required to document and record their current and past relationships with all companies. Any situation past or present which may present a potential conflict of interest is required by ICTS to be declared. ICTS will use the information to identify any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest.
- ❖ ICTS will not allocate a member of staff or sub-contractor to a management system audit where any past relationship has existed. Exceptionally and at the discretion of the Directors an individual or sub-contractor may be allocated to a management system audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- ❖ ICTS does not and will not offer any commission, ('finders fees' or other inducements) to any individual or company in respect of referrals of clients unless:
 - The terms and conditions of any such referral are clearly established and can be demonstrated and it can also be demonstrated that the fee is for a referral and the fact that a commission has been paid will in no way effect the outcome of an audit.
 - A risk assessment (to establish the potential for an unacceptable threat to impartiality) has been carried out on the process through which any such payment is made to an individual or organisation (normally a consultant) requesting the commission for referrals.
 - All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- ❖ ICTS does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by ICTS is general in nature and available to all companies or individuals who wish to attend.
- ❖ Policies and procedures for certification of individuals shall be fair among all applicants, candidates and certified persons.
- ❖ Certification shall not be restricted on the grounds of undue financial or other limiting conditions, such as membership of an association or group. ICTS shall not use procedures to unfairly impede or inhibit access by applicants and candidates.
- ❖ The recognition/approval of training by ICTS shall not compromise impartiality or reduce the assessment and certification requirements.
- ❖ ICTS will ensure that it is not linked or marketed in any way which links it with the activities of a management system consultancy and will take appropriate action should any such link be identified.
- ❖ Auditors and others involved in the certification process are not and will not be put under any pressure and will not be influenced in any way to come to a particular conclusion regarding the result of an audit.

3. ICTS Impartiality norms:

- ❖ No outsourcing of Audits to Consultancy Organisation.
- ❖ No Referral Fees to be paid to Consultancy Organisation.
- ❖ Facts based communication to Clients/Consultancy Organisation.
- ❖ Adherence to all Accreditation and other ICTS Policies.
- ❖ ICTS shall not carry out any other conflicting services other than its core business of Certification.
- ❖ ICTS shall not employ any professional conflicting its ethical policies.
- ❖ ICTS shall not allow any of its auditors to carry out financial transactions with clients / consultants.
- ❖ ICTS shall not carry out business with any consultant inducing pressures to compromise impartiality.

- ❖ All employees of ICTS shall disclose any situation impairing the business ethics.
- ❖ ICTS shall not allow any of the auditors to carry out audits for the client at least for 2 years from the date of relinquishment from their services for the client.
- ❖ ICTS shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ICTS norms.
- ❖ ICTS shall not allow any auditor to conduct the audit for the client for which it has not been approved for.
- ❖ ICTS shall maintain transparency with regard to all information.
- ❖ No auditor shall divulge any confidential information of the client to any third party without written consent from the client and approval by a Director.
- ❖ No auditor shall carry any client information with them after the usage period. All client information shall be returned after usage.
- ❖ Utmost care/verification to be carried out for granting the right scope of certification.
- ❖ Any unethical practice observed should be notified to the management at the earliest.
- ❖ ICTS shall not allow any auditor to conduct audit for the organization where any of its family members / close relatives are involved at a decision-making position.
- ❖ Disciplinary actions for non-adhering to impartiality policies shall be taken by the Management in consultation with the Impartiality and Ethics Committee.

4. Public Statement

ICTS, its Directors, Managers, Staff and others involved in the Certification of Organisations fully understand the importance of impartiality in undertaking its Certification Activities. ICTS will therefore ensure that in its dealings with clients or potential clients, all employees or other personnel involved in Certification Activities are, and will remain, impartial. To ensure that impartiality is both maintained and can be demonstrated, ICTS has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.