



Impartiality Policy

Certifi International Pty Ltd ABN 78 611 320 800 is the legal entity responsible for certification activities; reference to Certifi International in this Policy and Public Statement refers to this legal entity.

Certifi International its Directors, Staff and Subcontractors fully understand the importance of impartiality in undertaking its certification activities. Certifi International will therefore ensure that in all its dealings with clients or potential clients all employees or other personnel are and will remain impartial

To ensure that impartiality is both maintained and can be demonstrated the following principals have been established.

- Certifi International 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
- Certifi International does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- Certifi International does not offer (and has never offered) an internal audit service to its certified clients.
- Certifi International does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- Certifi International 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 Certifi International Any proposed relationship between Certifi International and any other company will undergo a risk assessment by the Committee for Impartiality 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 Certifi International 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 Certifi International to be declared. Certifi International 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.
- Certifi International will not allocate a member of staff or sub-contractor to a management system audit where any past relationship has existed. At the discretion of the General Manager however, 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.
- Certifi International 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:

1. The terms and conditions of any such referral are clearly established and can be demonstrated that the fee is for a referral only and that this fee will in no way effect the outcome of an audit.
 2. 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 for referrals.
 3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- Certifi International does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Certifi International is general in nature and available to all companies or individuals who wish to attend.
 - Certifi International will ensure that it is not linked or marketed in any way 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.

Certifi International Impartiality Norms for certification scheme:

- No outsourcing of Audits to Consultancy Organisation.
- No Referral Fees to be paid to Consultancy Organisation.
- Certifi International shall not carry out any other conflicting services other than its core business of Certification.
- Certifi International shall not employ any professional conflicting its ethical policies.
- Certifi International shall not allow any of its auditors to market the services and conduct the audits for the same client.
- Certifi International shall not allow any of its auditors to carry out financial transactions with clients / consultants.
- Certifi International shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of Certifi International shall disclose any situation impairing the business ethics.
- Certifi International 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.
- Certifi International shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ Certifi International norms.
- Certifi International shall not allow any auditor to conduct the audit for the client for which it has not been approved for.
- Certifi International 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 MD
- No auditor shall carry any client information with them after the usage period. All client information shall be returned after usage.
- Any unethical practice observed should be notified to the management at the earliest.
- Certifi International shall not allow any of its auditors to accept any gifts from client / consultant of value greater than AUD \$50, (any gifts under \$50 must be declared and recorded).
- Certifi International 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-adherence to impartiality policies shall be taken by the Management in consultation with Impartiality Committee.

- At no stage does Certifi International outsource its audits or any part of its certification services to management systems consultancy organisation
- Certifi International continues to evaluate the risks associated with its operations in the domestic and overseas to ensure it can meet liabilities associated with its certification activities. A comprehensive risk analysis is maintained and reviewed annually.
- Conflict of Interest and objectivity is further covered through annual training sessions and contractually binding agreements, to ensure all management system certification activities are conducted in an independent and impartial manner.
- All subcontracted Audit / certification staff or sector specialists used to support permanent staff of Certifi International shall sign a Subcontractor Agreement and a confidentiality & non-disclosure agreement.
- Certifi International direct employees are prohibited from engaging in consultancy activities, which involve the active design, generation or implementation of Management Systems.
- Certifi International staff or subcontractors shall not suggest or imply to imply that certification would be simpler, easier or less expensive if consultancy or training services were used. In addition, subcontract staff cannot offer consultancy or training services to Certifi's clients that they have been assigned to audit, during or after the assigned task has been completed.
- Certifi International recognize that the source of revenue for a certification body is the client paying for certification, and that this is a potential threat to impartiality. Therefore, Certifi International is a self-financed independent organisation, with a number of controls to ensure that impartiality is retained.
- To obtain and maintain confidence, it is essential that Certifi International's certification decisions are based on objective evidence of conformity or nonconformity, and that any decisions made are not influenced by other interests or by other parties.
- CERTIFI INTERNATIONAL recognizes that threats to impartiality include the following.
 - Self-interest threats arising from a person or body acting in their own interest.
 - Self-review threats arising from a person reviewing the work that they have conducted themselves.
 - Familiarity (or trust) threats arising from a person becoming too familiar with or too trusting of another, instead of seeking audit evidence.
 - Intimidation threats arising from a person having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.
 - A relationship that threatens the impartiality of the certification body can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients

Certifi International Impartiality Norms for product certification scheme:

- Certifi and any part of the same legal entity and other entities under its organisational 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 scheme requires the evaluation of the client's management system.
- It is Certifi policy not to conduct certification activity with separate legal entities or entities that may form a part of Certifi. However, in the unlikely event that certification is applied

to such entities Certifi shall ensure safeguard of objectivity and will not compromise the impartiality of our certification activities.

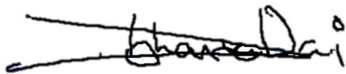
- When a separate legal entity offers or produces the certified product or offers or provides consultancy, Certifi International management personnel and personnel in the review and certification decision-making process shall not be involved in the activities of the separate legal.
- Within a period of 2 years personnel shall not be used to review or make a certification decision for a product for which they have provided consultancy
- Certifi International shall take action to respond to any risks to its impartiality, arising from the actions of other persons, bodies or organizations of which it becomes aware. Action will include but are not limited to;
 - Counselling and or disciplinary action
 - Termination of employment and or subcontractor agreement
 - Suspension and or withdrawal of certification
 - Termination of certification

Public Statement (as it appears on Certifi International's website)

Certifi International, its Directors, Managers, Staff and others involved in the Certification of Organisations fully understand the importance of impartiality in undertaking its Certification Activities.

Certifi International 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, Certifi International has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.



Bobby Bhardwaj
General Manager
Certifi International