



Q-Cert International (Pvt.) Ltd.

POLICY

Impartiality Policy

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Approved By	Top Management / CEO
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This policy is a controlled document of Q-Cert International (Pvt.) Ltd.

AMENDMENT RECORD

Rev.	Date	Section(s)	Description	Prepared By	Approved By
00	03-Jan-2025	All	Initial Issue	[Name], MR	[Name], CEO
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1. POLICY STATEMENT

Q-Cert International (Pvt.) Ltd. is committed to conducting all certification activities with impartiality, objectivity, and independence. Impartiality is the cornerstone of Q-Cert's credibility as an accredited certification body. Without genuine impartiality, third-party certification has no value.

Q-Cert's Top Management declares that:

- Certification decisions at Q-Cert are based solely on objective audit evidence and conformity with ISO 9001:2015 requirements — never on commercial pressure, client relationships, revenue considerations, or any other factor that could compromise objectivity.
- Q-Cert does not allow any person or organisation that has a financial, personal, or professional interest that could compromise impartiality to influence Q-Cert's certification activities.
- Q-Cert identifies, analyses, and manages all threats to impartiality on a continuous basis through its Impartiality Committee (IC) and formal risk management process.
- All Q-Cert personnel — internal and contracted — are bound by this Policy and are required to actively support its implementation.

2. SCOPE

This Policy applies to all Q-Cert certification activities and to all personnel involved in certification — including the CEO, Management Representative, Certification Manager, Certification Decision Maker, Audit Team Leaders, Auditors, Technical Experts, and Impartiality Committee members. It applies equally to internal employees and contracted (outsourced) personnel.

3. IMPARTIALITY PRINCIPLES

3.1 Independence of Certification Decisions

The Certification Decision Maker (CDM) who makes each individual certification decision shall have had no involvement in the audit for that specific client. This is an absolute rule with no exceptions. The CDM's decision is based solely on the objective evidence contained in the audit package — not on client pressure, commercial considerations, or ATL recommendation alone.

△ No person may pressure the CDM to issue a positive certification decision. Any report of such pressure must be investigated by the IC. This constitutes a fundamental threat to Q-Cert's accreditation.

3.2 No Consultancy

Q-Cert does not provide consultancy services for the design, implementation, or improvement of quality management systems to any organisation. Q-Cert personnel — including contracted auditors — are prohibited from providing such consultancy to Q-Cert clients or applicants. Any offering of advice beyond the information necessary for the audit process constitutes consultancy and is prohibited.

3.3 Conflict of Interest Management

Every Q-Cert auditor, ATL, CDM, and Technical Expert must complete a Conflict of Interest Declaration (FM-004) before every assignment. Q-Cert manages conflicts of interest through:

- Pre-assignment COI screening by the Certification Manager using FM-004.
- Exclusion of any person with a disqualifying COI from the relevant assignment.
- Six-year rotation rule — the same ATL shall not lead the audit of the same client for more than 3 consecutive certification cycles without IC review and approval.
- No ATL or auditor who has provided consultancy to a client within the past 24 months may conduct that client's certification audit.
- No person who has been employed by the client within the past 24 months may audit that client.

3.4 Impartiality Committee (IC)

Q-Cert's Impartiality Committee operates as an independent safeguard against impartiality threats. The IC consists of a minimum of 3 external members with no commercial relationship with Q-Cert's operational activities. The IC meets at least annually to:

- Review and validate Q-Cert's impartiality risk register.
- Assess the effectiveness of Q-Cert's COI management processes.
- Review any complaints or concerns about Q-Cert's impartiality.
- Provide recommendations to Top Management — IC recommendations on impartiality matters are binding.

4. THREATS TO IMPARTIALITY

Q-Cert proactively identifies and addresses the following categories of impartiality threat:

Threat Category	Description	Q-Cert Control
Self-interest	Financial or other benefit from a certification outcome	CDM independence; no-consultancy rule; COI declarations
Self-review	Reviewing one's own work	CDM never audits; ATL does not decide on own findings
Familiarity	Undue sympathy from close relationship	Rotation policy; COI declaration; IC oversight
Intimidation	Acting under pressure from client or management	CDM independence; IC escalation path; reporting obligation
Commercial pressure	Revenue-driven certification decisions	CDM fee independence; IC oversight; Top Management commitment
Structural	Owning consultancy or related business	Prohibition on CB/consultancy combination

5. PERSONNEL OBLIGATIONS

Every person performing Q-Cert certification activities must:

- Complete FM-004 (COI Declaration) before every assignment.
- Report any actual or potential COI to the Certification Manager immediately upon becoming aware of it.
- Sign FM-023 (Code of Conduct) upon engagement and comply with its provisions at all times.
- Not accept gifts, hospitality, or any benefit from a client that could reasonably create an obligation or compromise independence.
- Not perform certification activities in any area where they have a COI — accept exclusion without dispute.
- Report any attempt by any person to pressure a certification decision to the MR and IC immediately.

6. CEO COMMITMENT


Q-Cert's Top Management is committed to this Policy and will provide the resources and organisational structure necessary to implement it. The CEO commits to:

- Maintaining the independence of the IC and CDM from commercial pressures at all times.
- Not intervening in individual certification decisions made by the CDM.
- Acting on IC recommendations regarding impartiality threats within 30 calendar days.
- Reviewing this Policy annually at the Management Review and updating as necessary.

7. REVIEW AND COMMUNICATION

This Policy is reviewed annually at Q-Cert's Management Review. It is communicated to all Q-Cert personnel upon engagement and is publicly available on Q-Cert's website and upon request. All contracted auditors and Technical Experts must acknowledge this Policy before their first assignment.

8. CEO SIGNATURE

CEO / Managing Director	Name: A.J
Signature	
Date	03-Jan-2025