

# Impartiality Policy

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## 1. Purpose

The purpose of this policy is to ensure that all certification activities conducted by ICB International Certification Body LLC are impartial, free from conflicts of interest, and safeguard the integrity of the certification process. Impartiality is fundamental to the credibility of certification activities, and ICB International Certification Body LLC is committed to identifying, analyzing, and managing all potential risks to impartiality. This policy is based on Clauses 4.2.1 to 4.2.4 of ISO 17021 and serves as the foundation for maintaining objectivity in all operations.

## 2. Scope

This policy applies to all personnel, including auditors, decision-makers, and technical experts that are involved in the certification activities of ICB International Certification Body LLC. It covers the entire certification process, from initial audits to certification decisions and surveillance activities, ensuring that all actions are free from bias and that conflicts of interest are managed appropriately.

## 3. General Rules, and Impartiality Commitment (Clause 4.2)

Being impartial, and being perceived to be impartial, is necessary for us to deliver certification that provides confidence. It is important that all internal and external personnel are aware of the need for impartiality. Therefore, we make this Impartiality Policy available to all internal and external personnel.

We recognized that our source of revenue is our client paying for certification, and that this is a potential threat to our impartiality. To obtain and maintain confidence, it is essential that our decisions are based on objective evidence of conformity (or non-conformity) obtained by us, and that our decisions are not influenced by other interests or by other parties.

Threats to impartiality may include but are not limited to the following:

**Self-Interest:** Threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.

**Self-Review:** Threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom we provided management systems consultancy would be a self-review threat.

**Familiarity (or Trust):** Threats that arise from a person or body being too familiar with or trusting another person instead of seeking audit evidence.

**Intimidation:** Threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

### 3.1 General Impartiality Commitment

ICB International Certification Body LLC recognizes the importance of impartiality in conducting certification activities and understands the potential conflicts that may arise. As part of its commitment to impartiality it will comply with the following:

- **Management Commitment:** Top management ensures that all certification activities are conducted impartially and free from external influences.

The responsible persons are:

Prof. Dr. iur. Tinatin Erkvania, LL.M., Managing Director, [info@cert-authority.com](mailto:info@cert-authority.com)

Gevorg Tovmasyan, VP Certification, [info@cert-authority.com](mailto:info@cert-authority.com)

Prof. Dr. h.c. Heiko Maniero, LL.B., LL.M. mult., M.L.E., Main Shareholder, [info@cert-authority.com](mailto:info@cert-authority.com)

- **Organizational Structure:** We are structured in a way that supports impartiality and separates audit activities from certification decisions.
- **Policies and Procedures:** Documented policies and procedures are in place to identify, assess, and manage risks to impartiality.

### 3.2 Risk Management

ICB International Certification Body LLC employs a risk-based approach to identifying and mitigating risks to impartiality. This includes:

- **Risk Identification:** All potential risks, such as financial or commercial pressures, are identified and recorded.
- **Risk Analysis:** Risks are analyzed to determine their impact on impartiality.
- **Risk Mitigation:** Appropriate controls are implemented to minimize or eliminate risks, including independent decision-making.

Supervision of all impartiality activities is carried out by the following person:

Maria Lominadze, Lead Auditor, [info@cert-authority.com](mailto:info@cert-authority.com)

## 4. Impartiality Governance

### 4.1 Impartiality Committee

To ensure the ongoing management of impartiality, ICB International Certification Body LLC has established an Impartiality Committee, which is responsible for overseeing the impartiality of certification activities. The committee's responsibilities include:

- **Oversight:** Monitoring and reviewing certification activities to ensure impartiality is maintained.
- **Conflict Resolution:** Addressing any potential conflicts of interest and ensuring they are resolved before certification activities proceed.

The Impartiality Committee is composed of members from stakeholder groups, which may include third parties, employees and auditors, to provide a balanced perspective, and to make sure that the main source of our revenue, which are the clients paying for certification, will not become a threat to impartiality.

The members of the Impartiality Committee are:

Ulrich Baumann, Attorney at Law, Lead Auditor, ulrich.baumann@oikon.law

Sandra Desche, Attorney at Law, Lead Auditor, sandra.desche@oikon.law

#### 4.2 Independence of Certification Decisions

ICB International Certification Body LLC ensures that certification decisions are made independently from the personnel involved in audit activities. Auditors and decision-makers are kept separate to avoid any undue influence. In cases where risks to impartiality are identified, the Impartiality Committee intervenes to ensure that decisions are based on objective evidence.

### 5. Conflict-of-Interest Management

ICB International Certification Body LLC has implemented a Conflict-of-Interest Management Procedure to ensure that any potential conflicts are identified, disclosed, and managed effectively. This procedure includes:

- **Conflict Disclosure:** All personnel involved in certification activities, including auditors and decision-makers, must disclose any relationships or interests that could create a conflict of interest.
- **Review and Assessment:** Conflicts of interest are reviewed and assessed before any certification activities commence.
- **Mitigation Actions:** When a conflict of interest is identified, appropriate actions are taken to mitigate its impact. This may include reassigning personnel or excluding individuals from certain certification activities.

In addition, ICB International Certification Body LLC does not provide consultancy services related to the management systems it certifies, ensuring that there is no conflict in its auditing and certification activities.

### 6. Impartiality Safeguards

To maintain impartiality, ICB International Certification Body LLC has implemented the following safeguards:

- **Separation of Functions:** Audit functions and certification decision-making are separate and performed by different personnel to avoid any conflict of interest.
- **External Oversight:** The Impartiality Committee provides oversight on the effectiveness of impartiality controls, ensuring that certification activities remain free from undue influence, such as self-interest, self-review, intimidation or familiarity.
- **Regular Reviews:** Impartiality risks are reviewed regularly, and additional controls are implemented where necessary to strengthen impartiality safeguards.

Additionally, ICB International Certification Body LLC ensures that any risks to impartiality identified through external audits, complaints, or internal reviews are addressed promptly and effectively.

## 7. Review and Updates

This policy is reviewed annually by top management and updated as necessary to reflect any changes in organizational structure, certification activities, or external requirements. Updates must be approved by top management of ICB International Certification Body LLC and communicated to all personnel involved in certification activities.

## 8. References

ISO 17021 – Conformity assessment – Requirements for bodies providing audit and certification of management systems