

PCA GLOBAL SERVICES LLP

# **IMPARTIALITY POLICY**

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**REVISION HISTORY**

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## 1. Policy Statement

PCA Global Services is committed to impartiality in carrying out its management system certification activities. We understand the importance of impartiality in maintaining confidence in certification. Our certification decisions are based solely on objective evidence of conformity and are not influenced by commercial, financial, or other undue pressures.

To ensure impartiality, PCA Global Services is committed to:

- **Objectivity:** Conducting all certification activities in an objective and unbiased manner.
- **Independence:** Maintaining independence from any undue commercial, financial, or other pressures that could compromise impartiality.
- **Conflict of Interest Management:** Identifying, analyzing, and managing potential conflicts of interest to eliminate or minimize threats to impartiality.
- **Openness and Transparency:** Being open and transparent about our impartiality policy and how impartiality is safeguarded in our operations.
- **Fairness and Equity:** Treating all clients and stakeholders fairly and equitably, without bias or prejudice.
- **Responsiveness to Complaints:** Having a robust process for addressing any complaints or appeals related to impartiality.
- **Continual Improvement of Impartiality:** Regularly reviewing and improving our impartiality mechanisms and processes to enhance confidence in our certification services.

This Impartiality Policy is publicly available and communicated to all personnel and relevant stakeholders. Top management and the Impartiality Committee (or equivalent mechanism) are fully committed to upholding this policy and ensuring impartiality in all certification activities.

## 2. Scope

This Impartiality Policy applies to all management system certification activities undertaken by PCA Global Services, regardless of the certification scheme, industry sector, client size, or geographical location. It encompasses all personnel, committees, and outsourced activities involved in the certification process.

## 3. Principles and Objectives

To achieve the commitments outlined in this Impartiality Policy, PCA Global Services will adhere to the following key principles and objectives:

- **Understanding Impartiality Risks:**
  - PCA Global Services recognizes that threats to impartiality can arise from various sources, including but not limited to self-interest, threats to self-review, familiarity (or trust), intimidation, and competition.
  - We will systematically identify, analyze, and document potential impartiality risks associated with our certification activities, considering factors such as:
    - Ownership and governance structure.

- Financial relationships and revenue sources.
- Relationships with related bodies (e.g., parent organizations, subsidiaries, related consultancy services).
- Activities of personnel (current and past).
- Client relationships and dependencies.
- Market pressures and competition.
- Public perception and stakeholder expectations.
- Risk assessments will be conducted regularly and updated when there are significant changes to the organization, its activities, or its context.
- **Safeguards to Impartiality:**
  - PCA Global Services has established and will maintain robust safeguards to eliminate or minimize identified impartiality risks. These safeguards include:
    - **Impartiality Committee (or Equivalent Mechanism):** Establishing an Impartiality Committee (or equivalent body with a similar function) to:
      - Advise on matters affecting impartiality, including the development and review of impartiality policies and procedures.
      - Review risk assessments and plans related to impartiality.
      - Provide oversight and independent scrutiny of certification activities to ensure impartiality is maintained.
      - Respond to complaints and appeals related to impartiality.
      - Consist of balanced representation of interested parties, without any single interest predominating (e.g., representatives from certification body management, clients, industry associations, regulatory bodies, and other stakeholders).
    - **Organizational Structure and Governance:** Structuring PCA Global Services to ensure that certification activities are functionally separated from any other activities that could present a conflict of interest (e.g., consultancy, internal audits for clients).
    - **Financial Independence:** Ensuring that financial interests do not compromise impartiality. Revenue sources and financial arrangements are managed to minimize potential bias.
    - **Personnel Impartiality:**
      - Requiring all personnel involved in certification activities to sign impartiality declarations, committing to objectivity and disclosure of any potential conflicts of interest.
      - Implementing processes to screen personnel for potential conflicts of interest before assigning them to certification activities.
      - Ensuring that personnel are not pressured by commercial or other interests to make biased certification decisions.
      - Providing training to personnel on impartiality requirements and ethical conduct.
    - **Decision-Making Processes:** Establishing clear and objective criteria and processes for certification decisions, ensuring decisions are based on objective evidence obtained during audits and reviews, and are made by competent and impartial individuals or committees.

- **Review and Oversight:** Implementing independent review processes for certification decisions, especially for high-risk or complex cases, to ensure impartiality is maintained.
- **Public Transparency:** Making this Impartiality Policy publicly available to demonstrate our commitment to impartiality and build stakeholder confidence.
- **No Consultancy Services that Compromise Impartiality:**
  - PCA Global Services will not offer or provide consultancy services to its management system certification clients where such services could compromise impartiality.
  - If PCA Global Services is part of a larger organization that offers consultancy services, clear and demonstrable separation shall be maintained between the certification body and the consultancy services, to prevent conflicts of interest and ensure impartiality. This separation will be actively managed and monitored.
  - Personnel involved in certification activities will not provide consultancy to clients they are, or have been, involved in certifying, within a reasonable timeframe (e.g., a cooling-off period).
- **No Internal Audits as a Service to Certification Clients:**
  - PCA Global Services will not offer or provide internal audit services to its management system certification clients.
  - If PCA Global Services is part of a larger organization that offers internal audit services, clear and demonstrable separation shall be maintained between the certification body and the internal audit services, to prevent conflicts of interest and ensure impartiality.
- **Zero Tolerance for Bribery and Undue Influence:**
  - Global Services maintains a strict zero-tolerance policy toward bribery, corruption, or any form of undue influence in relation to its certification activities.
  - No personnel, contractor, or associated party is permitted to offer, solicit, or accept bribes, gifts, or favours that could influence or appear to influence the outcome of any certification decision.
  - Any attempt to influence the certification process through unethical or unlawful means will result in immediate corrective action, including possible suspension or withdrawal of certification, reporting to relevant authorities, and termination of personnel or contractual relationships.
- **Responsibility and Authority for Impartiality:**
  - Top management of PCA Global Services has ultimate responsibility for ensuring impartiality in all certification activities and for implementing and maintaining this Impartiality Policy.
  - The Impartiality Committee (or equivalent mechanism) has specific authority and responsibility for advising on, monitoring, and safeguarding impartiality.
  - The Management Representative / Quality Manager is responsible for the day-to-day implementation of the Impartiality Policy and related procedures.
  - All personnel involved in certification activities are responsible for upholding impartiality and reporting any potential threats to impartiality.

#### 4. Records

To ensure transparency and integrity in all certification activities, the following records shall be maintained in accordance with the PCA Global Services Record Management Procedure (CB-PROC-RECORD-MANAGE-001):

- Signed Declarations of Impartiality from all certification personnel
- Records of impartiality risk assessments and mitigation actions
- Meeting minutes of the Impartiality Committee, including reviews and recommendations
- Logs of identified conflicts of interest and their resolution
- Auditor assignment records demonstrating impartiality in auditor selection
- Reports of impartiality-related complaints and investigations
- Records of periodic reviews and updates to the Impartiality Policy
- Training records related to impartiality and conflict-of-interest awareness

#### 5. Review and Communication

This Impartiality Policy shall be:

- **Reviewed for continuing suitability** at least annually by the Impartiality Committee (or equivalent mechanism) and top management, or more frequently, if necessary, in cases such as; in response to identified risks, changes in organizational structure, or stakeholder feedback, etc.
- **Communicated and made available** to all personnel within PCA Global Services and to relevant external stakeholders, including clients, accreditation bodies, and the public.
- **Understood and implemented** by all personnel involved in certification activities.

**[Signature of Top Management Representative]**

**[Name and Title of Top Management Representative]**

**[Date of Approval]**