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Statement of integrity

The management and employees of Certima (which includes all internal and external personnel) are aware and understand that being impartial, and being perceived to be impartial, is necessary for a certification body to deliver certification that provides confidence.

The management of Certima understands that the source of revenue for a certification body is its client paying for certification, and that this is a potential threat to integrity. To avoid this, the sales contract includes a clause requiring that the payment should be effected before the first day of the audit. If the payment is not effected, the audit should be canceled.

Management of Integrity (Confidentiality, Independence and Impartiality)

All internal and external employees of Certima BV and Certima Bulgaria EOOD, hereafter designated as Certima and auditors have signed a confidentiality declaration to meet the requirements of ISO 17065/ ISO 17021.

Employees have signed a labor contract in which confidentiality is included;

Auditors (which include subcontracted auditors) have signed an agreement of which confidentiality and impartiality are included.

Before each audit, the audit team members undersign an Order letter document, which specifies the audit details (company, date etc.). This document also includes impartiality statement by the undersigned person, concerning the respective company.

Integrity is yearly analyzed and discussed in the management review of Certima.

If parts of the tasks are outsourced to external specialists, these persons are treated as auditors.

Additionally, Certima is prepared to sign mutually accepted secrecy agreements on request of an applicant or auditee. This agreement is filed together with all the other information on the applicant or auditee.

Integrity Committee

Members of IC

The members of IC of Certima include:

- Representative of the personnel of Certima,
- Representative of clients of Certima,
- Representative of customers of organizations whose management systems are certified,
- Representatives of industry trade associations,
- Representatives of governmental regulatory bodies or other governmental services,
- Representatives of non-governmental organizations, including consumer organizations

Regulation of the Integrity Committee

Article 1 General

1. The standard ISO 17021-1, Art 6.2, requires the Certification body to have a process for the effective control of certification activities. The risk that these activities pose to the competence, consistency and impartiality of the certification body shall be considered.
2. A requirement for a mechanism to manage the impartiality in ISO 17065, Art 5.2 states that the certification body shall have a mechanism for safeguarding its impartiality. An advice on this mechanism is provided, saying that a possible mechanism can be a committee established by a certification body. Also it says that If the top management of the certification body does not follow the input of this mechanism, the mechanism shall have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders).
3. Based on this in an Impartiality Committee (IC) is established in Certima. This Committee includes experts from parties concerned, covering the scope of Certima certification activities.
4. This regulation describes the constitution, the authority and the procedure of this Impartiality Committee.

Article 2 Constitution of IC

1. The Impartiality Committee consists out of one or more representatives with relevant knowledge of the following sectors:
 - a. Main food-chain categories, including Farming, Food and feed processing, Catering, Retail, transport and storage
 - b. Operations & Personnel of Certima B.V.
 - c. Representatives of the interested parties, which may include clients of the certification body, customers of clients, manufacturers, suppliers, users, conformity assessment experts, representatives of industry trade associations, representatives of governmental regulatory bodies or other governmental services, and representatives of non-governmental organizations, including consumer organizations.
 - d. If additional expertise is required the Impartiality Committee as well as the MD can propose for extension of the Impartiality Committee. The MD shall organise that the Impartiality Committee will be completed with the required expertise.
2. The MD of Certima will coordinate the activities of the IC
3. Each of the members of the Impartiality Committee, have voting power
4. The Impartiality Committee can invite experts for a specific area to provide specialized advice.

Article 3 Tasks and authorities

The tasks and authorities of the Integrity Committee are:

1. to assist in developing the policies to impartiality of its certification activities;
2. to counteract any tendency by the certification body to allow commercial or other considerations to guarantee the consistent objective provision of certification activities;
3. to advise on matters affecting confidence in certification, including openness and public perception
4. to give compelling indications if the Integrity of Certima is at stake.
5. if the management of the certification body does not follow the input of the IC, and the IC is convinced that integrity of the certification activities is seriously threatened, the IC has the right to inform authorities, accreditation bodies and other stakeholders. Acting as such, the confidentiality requirements relating to the client and the CB shall be respected.
6. to conduct a review, at least once annually, of the impartiality of the audit, certification and decision making processes of the certification body

Article 4 Procedure

Based on a preliminary approved schedule, at least once per year, each of the members of IC receives report from the MD which includes the following:

- Description of the Certima organization as well structure of the ownership of the linked legal entities
- Description of the Certima processes of sales, auditing and certification
- The output of the Certima impartiality risk assessment
- The Certima procedures and instructions to assure integrity
- The Certima internal audit procedure and audit reports
- The Certima complaint / appeal procedures and registrations
- Overview of corrective and preventive actions and their verification
- The Certima management review

If, based on the information received or from other sources, a member of the IC has ground to conclude that the top management of Certima:

- does not comply with the policies and principles relating to the impartiality of its certification activities, or
- observe any tendency on the part of a certification body to allow commercial or other considerations to prevent the consistent impartial provision of certification activities, or
- have evidences of any other matters affecting impartiality and confidence in certification, including openness,

This IC member should issue and submit a warning letter to the rest of the IC members, asking the IC committee to hold a meeting where the particular concerns will be discussed.

As a result of this meeting the IC should issue an IC decision, which states the inputs to be considered by the MD and the rest of the general management of Certima in order to assure the safeguarding of the impartiality principles. The IC will require evidences for corrective actions to be taken by the MD and the general management of Certima.

If MD and general management of Certima does not provide the requested corrective actions or if these actions are not effective, the IC have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking this action, the confidentiality requirements relating to the client concerned and Certima shall be respected.

In order to be effected, the decision for taking independent action should be supported by 50% plus one of the members of IC.

An input from IC that is in conflict with the operating procedures of the certification body or other mandatory requirements should not be followed. Management should document the reasoning behind

the decision to not follow the request of the IC and maintain the document for review by appropriate personnel.

Article 5 Confidentiality

Before to receive any information, related with the customers of Certima, all members of IC should sign a Confidentiality declaration.

Impartiality assessment guidelines

Overview of hazards

This overview is not a complete list, but this list can be used during the assessment.

Certima's key personal

- Decision is influenced by retailer (wants to get rid of this supplier)
- Decision is influenced by auditee (does not accept a negative decision)
- Decision is influenced by partner (wants to have a positive result)
- Decision is influenced by Managing Director or other executive of Certima BV (wants to have a positive result)
- Certima BV is dependent of auditee because of high turnover in general
- Certima BV is dependent of auditee because of high turnover with regard to other services
- Certima BV is not impartial because of consultancy activities of connected companies
- Certima BV is not impartial because of ownership auditee
- Manager/OM/CM Certima BV is not impartial because of ownership auditee
- Manager/OM/CM Certima BV is not impartial because of salary and bonus (turnover target)
- Manager/OM/CM Certima BV is not impartial because of relation with competitor
- Manager/OM/CM Certima BV is not impartial because of consultancy
- Manager/OM/CM Certima BV is not impartial because of family relation with employee auditee
- Manager/OM/CM Certima BV is not impartial because of personal relation with employee auditee

Auditors

Below is a non-exhaustive list of threats to auditor impartiality will be considered:

- Self-interest threats — threats that arise from auditors acting in their own interest. Self-interests include auditors' emotional, financial, or other personal interests. Auditors may favour, consciously or subconsciously, those self-interests when performing a management system audit.
- Self-review threats — threats that arise from auditors reviewing the work done by themselves or by their colleagues.
- Familiarity (or trust) threats — threats that arise from auditors being influenced by a close relationship with an auditee.
- Intimidation threats — threats that arise from auditors being, or believing that they are being, openly or secretly coerced by auditees or by other interested parties.
- Advocacy threats (this could occur when a body or its personnel is acting in support of, or in opposition to, a given auditee, which is at the same time its customer, in the resolution of a dispute or litigation);
- Competition threats, for example, when a contracted technical assessor is employed by a direct competitor of the auditee organization.

References

ISO 17021-1:2015, Art 6.2

ISO 17065:2012, Art 5.2

ISO&IAF ISO 9001 Auditing practices group. Guidance on impartiality, 16 Jan 2016