

Title:	ICG 17021 QMS ISO 9001	Responsible:	VP – Mary Ann Llanes	Last Update:	2-1-2020	Controlled: Y/N	Yes
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PO 1 - Impartiality Policy – Impartiality 1
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International Compliance Group (ICG) is the legal entity responsible for certification activities; reference to International Compliance Group in this Policy and Public Statement refers to these legal entities.

International Compliance Group, its Directors and Management, Staff and Sub-contractors fully understand the importance of impartiality in undertaking its Certification Activities. International Compliance Group 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 principles have been established.

- International Compliance Group Certificates are only issued following a review by an independent authorized and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate
- International Compliance Group does not offer management system consultancy or any other form of consultancy to companies or individuals to whom it provides Certification Activities.
- International Compliance Group does not offer internal audit service to its certified clients.
- International Compliance Group does not own or have any interest (financial or otherwise) in any other company that offers certification services.
- International Compliance Group does not have any relationships with companies who offer consultancy or other services that can be construed as having an impact on the certification services provided by International Compliance Group. Any proposed relationship between International Compliance Group and any other company will undergo a risk assessment by the Corporate Impartiality Committee prior to that relationship being completed. Any current relationships with companies, organizations 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 International Compliance Group 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 International Compliance Group to be declared. International Compliance Group 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.
- International Compliance Group 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 President of assigned manager, an individual may be allocated to a management system audit where a past relationship has existed provided a minimum 2 years have lapsed since the previous relationships.
- International Compliance Group 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 and it can also be demonstrated that the fee is for a referral and the fact that a commission has been paid 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 organization (normally a consultant) requesting the commission for referrals.
 3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- International Compliance Group does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by International Compliance Group is general in nature and available to all companies or individuals who wish to attend.
- International Compliance Group will ensure that it is not linked or marketed in any way which links it 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.

Public Statement

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

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