



Impartiality Policy

ICA Risk is committed to conducting all certification activities in a fair and objective manner. We aim to act professionally and with integrity in all our business dealings and relationships, as well as implement and enforce effective controls to manage and maintain impartiality.

Top Management is committed to safeguarding impartiality and ensuring the implementation of this policy. Financial and commercial pressures shall not affect the impartiality of the certification activities conducted. All decision making, including the issuing, renewing, suspending, and withdrawing of certification, is the responsibility and authority of Top Management, and shall be made without influence from outside parties.

ICA Risk will regularly assess risks to impartiality across its certification activities. This risk assessment shall be conducted in line with ICA Risk's overall risk management process. Identified risks will be documented on the risk management register, including planned actions to mitigate any unacceptable risks.

To maintain impartiality, ICA Risk shall not:

- Certify the management system of another certification body,
- Provide consultancy to existing clients, or onboard any new clients that have previously received any consultancy from the organisation, or any organisation it has a relationship with,
- Outsource any audits, or certification activities to a consultancy organisation,
- Suggest the use of, or be marketed or linked to any consultancy organisation, and shall take action to address this should an external organisation suggest the use of ICA Risk as a certification body,
- Use personnel involved in prior consultancy of a client in any aspect of the certification process, including auditing for at least 2 years after the consultancy has taken place,
- Use decision makers to form part of the audit team,
- Conduct internal audits for any of our certified clients, or certify the management system of an organisation on which we have conducted internal audits within the prior 2 years.

To safeguard impartiality, ICA Risk has established an impartiality committee that is independent from the CAB team and has the authority to override decisions taken by Top Management that could adversely impact impartiality.

The impartiality committee meets biannually and is responsible for:

- Consultation with the CAB team on all matters related to impartiality,
- Monitoring ICA Risk's certification activities in line with its scope of accreditation,
- Reviewing the associated risks to impartiality to determine the appropriateness of the action taken, and to monitor the residual risk,
- Agreeing actions to address threats to impartiality with the CAB team.

When assembling an audit team to conduct management system audits with a client, all members of the audit team, including the lead auditor, auditors, and technical experts shall have signed agreements in place prior to engagement. In addition to this, a conflict-of-interest declaration must be completed and signed by each member of the audit team, as well as the client. Any known



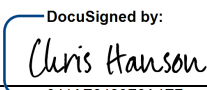
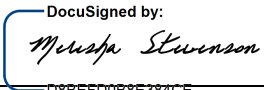
conflicts of interest must be declared, and where a conflict of interest is present, personnel cannot take part in audits for that client.

In addition to this, where introducers are engaged with, they cannot be involved in, or influence any part of the audit process, including forming part of the audit team. All decision making shall remain the responsibility of ICA Risk, and introducers will have no influence over the issuing, suspension, or withdrawal of certification.

Version History

Date of Release	Summary of Changes
06/04/21	Document reviewed in line with change of management.
29/06/21	Rewritten policy to detail specific processes in place to address impartiality within ICA Audit.
03/12/21	Added note about decision makers not being used in the audit team. New ICA Audit logo added.
17/02/22	Rebrand to ICA Risk.
June 14, 2022 12:31 BST	Amendment to the rules around conducting internal audits for other organisations.

Review & Approval

Document Updated By	Document Approved By
Name: Chris Hanson	Name: Merisha Stevenson
Signature:  <small>DocuSigned by: 041AE8480F6A4E7...</small>	Signature:  <small>DocuSigned by: D8BEFD0B8E384CE...</small>
Date: June 14, 2022 11:54 BST	Date: June 14, 2022 12:31 BST