

CP 07 Alcumus ISOQAR IMPARTIALITY POLICY

Alcumus ISOQAR Ltd is the legal entity responsible for certification activities; reference to Alcumus ISOQAR in this Policy and Public Statement refers to this legal entity.

Alcumus ISOQAR its Directors, Managers and Staff fully understand the importance of impartiality in undertaking its Certification Activities. Alcumus ISOQAR 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 principals have been established.

- Alcumus ISOQAR Certificates are only issued following a review by an independent authorised and competent individual (who has not been involved in the audit) to ensure that no interest shall predominate
- Alcumus ISOQAR does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- Alcumus ISOQAR does not offer (and has never offered) an internal audit service to companies or individuals.
- Alcumus ISOQAR does not own or have any interest (financial or otherwise) in any other company that offers certification, management system consultancy for accredited standards that Alcumus ISOQAR certificates or internal audit services.
- Alcumus ISOQAR does not have (and will not form) any relationships with companies who offer consultancy, internal audit services or other services that can be construed as having an impact on the certification services provided by Alcumus ISOQAR. Any proposed relationship between Alcumus ISOQAR and any other company will undergo a risk assessment as part of the risk treatment planning prior to that relationship being formalised. Any current relationships with companies, organisations 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 Alcumus ISOQAR 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 Alcumus ISOQAR to be declared. Alcumus ISOQAR 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.
- Alcumus ISOQAR will not allocate a member of staff or sub-contractor to a management system audit where any past relationship has existed. Exceptionally and at the discretion of the Directors an individual or sub-contractor may be allocated to a management system audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- Alcumus ISOQAR 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 organisation (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.
- Alcumus ISOQAR does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Alcumus ISOQAR is general in nature and available to all companies or individuals who wish to attend.
 - Alcumus ISOQAR 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.

Group Statement

Alcumus Holdings is the legal entity responsible for technology enabled compliance risk management and certification activities; reference to Alcumus in this Policy and Public Statement refers to the Alcumus Group which includes Alcumus ISOQAR, Alcumus HSE, Alcumus Sypol, and Alcumus Info Exchange.

Alcumus its Directors, Managers and Staff fully understand the importance of impartiality in undertaking its certification and compliance activities. Alcumus 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 Alcumus has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.

Alyn Franklyn

A handwritten signature in blue ink, appearing to read "Alyn Franklyn".

CEO Alcumus Group