
	Lex-Q Certifications	LexQ_PY_IPY_V 1.2
	Impartiality Policy	08-01-2021

Lex-Q Certifications is the legal entity responsible for certification activities; reference to Lex-Q Certifications in this Policy and Public Statement refers to these legal entities.

Lex-Q Certifications its Directors, Staff and Sub-contractors fully understands the importance of impartiality in undertaking its Certification Activities. Lex-Q Certifications 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.

- Lex-Q Certifications Certificates are only issued following a review by an independent authorised and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate
- Lex-Q Certifications does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- Lex-Q Certifications does not offer (and has never offered) an internal audit service to its certified clients.
- Lex-Q Certifications does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- Lex-Q Certifications does not have (and will not form) any relationships with companies who offer consultancy or other services that can be construed as having an impact on the certification services provided by Lex-Q Certifications Any proposed relationship between Lex-Q Certifications and any other company will undergo a risk assessment by the Committee for Impartiality 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 Lex-Q Certifications 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 Lex-Q Certifications to be declared. Lex-Q Certifications 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.
- Lex-Q Certifications 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 Technical Manager or 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.
- Lex-Q Certifications 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.

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- Lex-Q Certifications does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Lex-Q Certifications is general in nature and available to all companies or individuals who wish to attend.
- Lex-Q Certifications 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.

Lex-Q Certifications India's Impartiality Norms:


- No outsourcing of Audits to Consultancy Organization.
- No Referral Fees to be paid to Consultancy Organization.
- Facts based communication to Clients/ Consultancy Organization.
- Adherence to all Accreditation and other Lex-Q Certifications Policies.
- Lex-Q Certifications shall not carry out any other conflicting services other than its core business of Certification.
- Lex-Q Certifications shall not employ any professional conflicting its ethical policies.
- Lex-Q Certifications shall not allow any of its auditors to market the services and conduct the audits for the same client.
- Lex-Q Certifications shall not allow any of its auditors to carry out financial transactions with clients / consultants.
- Lex-Q Certifications shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of Lex-Q Certifications shall disclose any situation impairing the business ethics.
- Lex-Q Certifications shall not allow any of the auditors to carry out audits for the client at least for 2 years from the date of relinquishment from their services for the client.
- Lex-Q Certifications shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ Lex-Q Certifications norms.
- Lex-Q Certifications shall not allow any auditor to conduct the audit for the client for which it has not been approved for.
- Lex-Q Certifications shall maintain transparency with regard to all information.
- No auditor shall divulge any confidential information of the client to any third party without written consent from the client and approval by MD
- No auditor shall carry any client information with them after the usage period. All client information shall be returned after usage.
- Utmost care / verification to be carried out for granting the right scope of certification.
- Any unethical practice observed should be notified to the management at the earliest.

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- Lex-Q Certifications shall not allow any of its auditors to accept any gifts from client / consultant of value greater than INR 500.
- Lex-Q Certifications shall not allow any auditor to conduct audit for the organization where any of its family members / close relatives are involved at a decision making position.
- Disciplinary actions for non-adhering to impartiality policies shall be taken by the Management in consultation with Impartiality Committee.
- To supplement in-house resource **LEX-Q CERTIFICATIONS** employs Associate (sub-contract) auditors and sometimes has working relationships with overseas business managers. At no stage does **LEX-Q CERTIFICATIONS** outsource its audits to management systems consultancy organization, outsource its certification decisions, or link its marketing activities with management systems consultancy. **LEX-Q CERTIFICATIONS** retains full control of all decision making processes regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification.
- **LEX-Q CERTIFICATIONS** continues to evaluate the risks associated with its operations in the domestic and overseas to ensure it can meet liabilities associated with its certification activities. A comprehensive risk analysis is maintained and reviewed annually.
- Conflict of Interest and objectivity is further covered through annual training sessions and contractually binding agreements, to ensure all management system certification activities are conducted in an independent and impartial manner.
- Audit / certification staff are prohibited from participating in the Audit / certification of any organization to which they have given assistance, by consultancy or training (other than professionally registered auditor training), or where they have any financial or commercial interest for a minimum period of 2 years prior to the date of application of the organization for registration.
- When allocated to a particular contract, Audit / certification staff shall not disclose or discuss any detail; before or after the Audit / certification; to any member of staff other than their direct Management or other members of the team, as required by the Secrecy & Non-Disclosure agreement signed on commencement of employment.
- All subcontracted Audit / certification staff or sector specialists used to support permanent staff of **LEX-Q CERTIFICATIONS** shall sign a Subcontractor Agreement and a Secrecy & Non Disclosure Agreement and shall be included on the Office Potential Conflict Listing.
- **LEX-Q CERTIFICATIONS** direct employees are prohibited from engaging in consultancy activities, which involve the active design, generation or implementation of a Quality or Environmental Management System.
- All directly employed Management and Staff are required to declare all financial interests or business activities on commencement and during the period of employment.
- **LEX-Q CERTIFICATIONS** staff or subcontractors shall not suggest or imply to imply that certification would be simpler, easier or less expensive if consultancy or training services were used. In addition subcontract staff cannot offer consultancy or training services to

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LEX-Q CERTIFICATIONS's clients that they have been assigned to audit, during or after the assigned task has been completed.

- Overall the certification of companies who supply a service to **LEX-Q CERTIFICATIONS** is not deemed to be an unacceptable threat to conflict of interest. However, certification of a company in partnership with whom **LEX-Q CERTIFICATIONS** provides a direct service is deemed to be an unacceptable **Impartiality Policy**.
- **LEX-Q CERTIFICATIONS** recognize that the source of revenue for a certification body is the client paying for certification, and that this is a potential threat to impartiality. Therefore **LEX-Q CERTIFICATIONS** is a self financed independent organization, with a number of controls to ensure that impartiality is retained. To obtain and maintain confidence, it is essential that **LEX-Q CERTIFICATIONS** certification decisions are based on objective evidence of conformity or nonconformity, and that any decisions made are not influenced by other interests or by other parties. Certification decisions are made and signed for by a competent Certification Manager who was not responsible for the audit and was not a member of the audit team **LEX-Q CERTIFICATIONS** recognizes that threats to impartiality include the following.
 - Self-interest threats arising from a person or body acting in their own interest.
 - Self-review threats arising from a person reviewing the work that they have conducted themselves.
 - Familiarity (or trust) threats arising from a person becoming too familiar with or too trusting of another, instead of seeking audit evidence.
 - Intimidation threats arising from a person having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

Public Statement (as it appears on Lex-Q Certifications website)


Lex-Q Certifications is committed to impartiality in carrying out management systems auditing and certification activities.

To this effect, Lex-Q Certifications shall not provide certification if its relationship with client organization poses an unacceptable threat to impartiality. Lex-Q Certifications shall take action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.

Top Management of the Lex-Q Certifications hereby declares that Lex-Q shall comply with the requirements of ISO 17021:2015 and ensure impartiality for all its personal related to the certification activities & within all of its certification activities of ISO 9001:2015, ISO 27001:2013 and other certification carrying on by the Le-Q from time to time.


LEX-Q CERTIFICATIONS understands the importance of impartiality in carrying out its management system certification activities, manages conflict of interest and ensures the objectivity of its management system certification activities. LEX-Q CERTIFICATIONS has identified the following prohibitive, restrictive measures to ensure the impartiality:-

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- LEX-Q CERTIFICATIONS doesn't not certify another certification body for its management system certification activities
- LEX-Q CERTIFICATIONS and any part of LEX-Q CERTIFICATIONS doesn't not offer or provide management system consultancy
- LEX-Q CERTIFICATIONS and any part of LEX-Q CERTIFICATIONS doesn't not offer or provide internal audits to its certified clients
- LEX-Q CERTIFICATIONS doesn't certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and LEX-Q CERTIFICATIONS poses an unacceptable threat to the impartiality of the LEX-Q CERTIFICATIONS at least within two years following the end of the management system consultancy
- LEX-Q CERTIFICATIONS doesn't outsource audits to a management system consultancy organization, as this poses an unacceptable threat to the impartiality. This does not apply to individuals contracted as auditors
- LEX-Q CERTIFICATIONS' activities are not marketed or offered as linked with the activities of an organization that provides management system consultancy.
- LEX-Q CERTIFICATIONS takes action to correct inappropriate claims by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if LEX-Q CERTIFICATIONS is used
- LEX-Q CERTIFICATIONS also doesn't state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization is used
- LEX-Q CERTIFICATIONS does not use personnel to take part in an audit or other certification activities if they have been involved in management system consultancy towards the client in question within two years
- LEX-Q CERTIFICATIONS takes action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations that come to LEX-Q CERTIFICATIONS notice. The actions may include putting the information on LEX-Q CERTIFICATIONS website, warning such persons, bodies or organizations involved, informing accreditation body, initiating legal actions etc.
- LEX-Q CERTIFICATIONS personnel, either internal or external, or committees, who could influence the certification activities, act impartially and don't not allow commercial, financial or other pressures to compromise impartiality. LEX-Q CERTIFICATIONS has signed an agreement with each personnel to this effect. LEX-Q CERTIFICATIONS collect client feedback regularly to monitor the conduct of LEX-Q CERTIFICATIONS personnel.
- LEX-Q CERTIFICATIONS requires each personnel, internal and external, to reveal any situation known to them that may present them or LEX-Q CERTIFICATIONS with a conflict of interests as per agreement

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Director Certifications
Lex-Q Certifications

How we maintain impartiality

Lex-Q Certifications has processes in place to ensure that all our auditors throughout the world maintain impartiality and integrity. Upon entering employment or becoming a contractor, all auditors must sign a contract that specifies that they have no conflict of interest, and that they will maintain absolute confidentiality. Regular training sessions for auditors also emphasize the importance of impartiality.

Through an **Impartiality Risk Analysis**, Lex-Q Certifications identifies, analyses and documents potential situations of conflict of interests, rising from provision of certification services, including:


- relationships among, and common clients across, all parts of Lex-Q Certifications;
- any significant changes in the certification activities, organization, structure and legal status;

Lex-Q Certifications also manages impartiality through its **Impartiality Committees** established. These Committees:

- assist in developing the policies relating to impartiality of its certification activities;
- counteract any tendency on the part of Lex-Q Certifications entity to allow commercial, or other considerations, to prevent consistent and objective provision of certification activities;
- advise on matters affecting confidence in certification, including openness and public perception;
- review, at least once a year, impartiality of the audit, certification and decision-making processes of the Lex-Q Certifications entity;
- review evaluation of finances and sources of income for threats to impartiality;
- review any residual impartiality risk to determine if it is within the level of acceptable risk.

What constitutes a threat to impartiality?

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Lex-Q Certifications maintains vigilance in the face of four main threats to impartiality:

1. Self-interest: the threat of a person acting in their own interest rather than that of the organization
2. Self-review: whereby a person or body reviews work carried out by themselves. This includes auditing the management systems of a client to whom the certification body has provided management systems consultancy
3. Trust: threats arising from an auditor or entity being too familiar with the client instead of demanding evidence during the audit
4. Intimidation: whereby an auditor believes he or she is coerced openly or implicitly

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