

1.0 Purpose

To eliminate or minimize the threats to the impartiality of system certification and auditing activity through taking corrective and preventive actions to conflicts of interests based on the identification and analysis of the possibilities of various potential threats of conflicts.

Scope

2.0 All the system certification and audit activities of **LEVERAGE** (hereinafter called “**LVG**”) shall be covered by this procedure.

3.0 Openness

3.1 **LEVERAGE** needs to provide public access to, or disclosure of, appropriate and timely information about its audit process and certification process, and about the certification status (i.e. the granting, extending, maintaining, renewing, suspending, reducing the scope of, or withdrawing of certification) of any organization, type of management systems and certification schemes in which it operates, the use of LVG name and mark or logo, processes for handling requests for complaints and appeals, in order to gain confidence in the integrity and credibility of certification. Openness is a principle of access to, or disclosure of, appropriate information.

3.2 To gain or maintain confidence in certification, **LEVERAGE** should provide appropriate access to, or disclosure of, non-confidential information about the conclusions of specific audits (e.g. audits in response to complaints) to specific interested parties.

3.3 Information provided by the certification body to any client or to the marketplace, including advertising, shall be accurate and not misleading.

3.4 **LEVERAGE** needs to provide upon request information about:

- a) geographical areas in which it operates;
- b) the status of a given certification;
- c) the name, related normative document, scope and geographical location (city and country) for a specific certified client.

3.5 **LEVERAGE** should provide appropriate access to interested stakeholders of this Procedure of Impartiality

Control, via LVG's website at www.leveragelimited.com

Statement

4.0

LEVERAGE has fully understood that the impartiality is crucial to the confidence of the system certification. **LEVERAGE** will conduct the identification and analysis of potential threats to the impartiality and take corrective and preventive actions to manage the impartiality, to ensure the confidence and integrity of the system certification activities.

Procedure

5.0

- 5.1 **LEVERAGE** has recognized that being impartial and being perceived to be impartial is necessary for a certification body to deliver certifications that provides confidence.
- 5.2 **LEVERAGE** will consider that the source of revenue is client paying for certification, and that this is a potential threat to impartiality.
- 5.3 To obtain and maintain confidence, it is essential that **LVG's** decisions be based on objective evidence of conformity (or nonconformity) obtained by **LVG**, and that its decisions are not influenced by other interests or by other parties.
- 5.4 Threats to impartiality of the system certification include the following:
 - a) **Self-interest threats:** threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
 - b) **Self-review threats:** threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat.
 - c) **Familiarity (or trust) threats:** threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.
 - d) **Intimidation threats:** threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

5.5 Management of impartiality

- 5.5.1 **LEVERAGE** shall have top management commitment to impartiality in management system certification activities. **LEVERAGE** shall have a publicly accessible statement that it understands the importance of impartiality in carrying out its management system certification activities, and manages conflict of interest and ensures the objectivity of its management system certification activities.
- 5.5.2 **LEVERAGE** shall identify, analyze and document the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationships on a regular basis, at least once a year. If any relationship creates a threat to impartiality, **LEVERAGE** shall document and be able to demonstrate how it eliminates or minimizes such threats. The demonstration shall cover all potential sources of conflict of interests that are identified, whether they arise from within **LEVERAGE** or from the activities of other persons, bodies or organizations.
- 5.5.3 A relationship that threatens the impartiality of **LVG** can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients, etc. Examples are as the stockholders of **LVG**, Consulting Company, other Certification Bodies, Local Government Organizations, Local NGOs, Personnel of **LVG** including management staff and auditors, clients, certified facilities, and marketing.
- 5.5.4 When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of **LVG** requesting certification from its parent), then certification shall not be provided.
- 5.5.5 **LEVERAGE** shall not certify another certification body for its management system certification
- 5.5.6 **LVG** and any part of the same legal entity shall not offer or provide management system consultancy.
- 5.5.7 When using individual external auditors and external technical experts, **LVG** shall require external auditors and external technical experts to have a written agreement by which they commit themselves to comply with applicable policies and procedures as defined by the certification body.

The agreement shall address aspects relating to confidentiality and to independence from commercial and other interests, and shall require the external auditors and external technical experts to notify the certification body of any existing or prior association with any organization they may be assigned to audit.

5.5.8 When outsourcing is used, **LVG** shall have a process in which it describes the conditions under which outsourcing (which is subcontracting to another organization to provide part of the certification activities on behalf of the certification body) may take place. **LVG** shall have a legally enforceable agreement covering the arrangements, including confidentiality and conflict of interests, with each body that provides outsourced services. But, decisions for granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification shall never be outsourced.

5.6 Impartiality Safeguard Committee (ISC)

5.6.1 **LVG** has established the **LVG -ISC** (Governing Board) to safeguard the impartiality.

5.6.2 The structure of **LVG** shall safeguard the impartiality of the activities of **LVG** and shall provide for a Governing Board to

- a) assist in developing the policies relating to impartiality of its certification activities,
- b) counteract any tendency on the part of **LVG** to allow commercial or other considerations to prevent the consistent objective provision of certification activities,
- c) advise on matters affecting confidence in certification, including openness and public perception, and
- d) conduct a review, at least once annually, of the impartiality of the audit, certification and decision-making processes of **LVG**.

5.6.3 Other tasks or duties may be assigned to the Governing Board provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

5.6.4 The composition, terms of reference, duties, authorities, competence of members and

responsibilities of this Governing Board shall be formally documented and authorized by the top management of **LVG** to ensure

- a) representation of a balance of interests such that no single interest predominates (internal or external personnel of **LVG** are considered to be a single interest, and shall not predominate),
- b) access to all the information necessary to enable it to fulfill its functions, and
- c) that if the top management of **LEVERAGE** does not respect the advice of this Governing Board, the Governing Board shall have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking independent action, the Governing Board shall respect the confidentiality requirements relating to the client and **LVG**.

5.6.5 Although this Governing Board cannot represent every interest, **LEVERAGE** should identify and invite key interests. Such interests may include: clients of the certification body, customers of organizations whose management systems are certified, representatives of industry trade associations, representatives of governmental regulatory bodies or other governmental services, or representatives of non-governmental organizations, including consumer organizations.

5.7 Confidentiality

5.7.1 LVG shall be responsible, through legally enforceable agreements, for the management of all information obtained or created during the performance of certification activities at all levels of its structure, including committees and external bodies or individuals acting on its behalf.

5.7.2 LVG shall inform the client, in advance, of the information it intends to place in the public domain. All other information, except for information that is made publicly accessible by the client, shall be considered confidential.

5.7.3 Except as required in this part of ISO/IEC 17021, information about a particular certified client or individual shall not be disclosed to a third party without the written consent of the certified client or individual concerned.

5.7.4 When LVG is required by law or authorized by contractual arrangements (such as with the accreditation body) to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information provided.

5.7.5 Information about the client from sources other than the client (e.g. complainant, regulators) shall be treated as confidential, consistent with the LVG's policy.

5.7.6 Personnel, including any committee members, contractors, personnel of external bodies or individuals acting on the LVG's behalf, shall keep confidential all information obtained or created during the performance of the certification body's activities except as required by law.

5.7.7 LVG shall have processes and where applicable equipment and facilities that ensure the secure handling of confidential information.

6.0 Responsiveness to complaints

6.1 Parties that rely on certification expect to have complaints investigated and, if these are found to be valid, should have confidence that the complaints will be appropriately addressed and that a reasonable effort will be made to resolve the complaints.

6.2 Effective responsiveness to complaints is an important means of protection for **LVG**, its clients and other users of certification against errors, omissions or unreasonable behavior.

6.3 Confidence in certification activities is safeguarded when complaints are processed appropriately.

7.0 Impartiality Complaints

Any parties can raise impartiality related complaints or appeals to **LVG**, accreditation bodies, and/or the governmental regulatory bodies.

Risks to certified organizations

Any corruption of this impartiality procedure may lead to the termination, withdraw or failure of the certification to facilities seeking certification.

8.0

9.0 Records and Reports






- 9.1 Threats identification and analysis report of impartiality to system certification
- 9.2 Annual review record of Governing Board to Impartiality control
- 9.3 **LVG -ISC** Governing Board Member List and TOR
- 9.4 Complaints to impartiality of **LEVERAGE**, if any



Impartiality Control Procedure

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Document Revision Records

No.	Date	Description of Change	Prepared By	Reviewed By	Approved By
1.0	June 1 2017	Initial Release	Yuki TSE 	Yuki TSE 	Aron QU 
2.0	August 1 2019	Modification of Clause: 3.1 Public information scope 3.4 Information upon request 5.5.6 No internal audit	Yuki TSE 	Yuki TSE 	Aron QU 