 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

1. Purpose

The Impartiality Committee is the mechanism of Certification Division of Imperial Bio Solutions Pvt. Ltd. has selected for obtaining advice, support and vigilance in developing, improving and maintaining a certification program that will satisfy the requirements of the relevant accreditation bodies and sector authority organizations. This is accomplished through the appointment of a group of individuals, mainly outside of the Imperial Bio Solutions Pvt. Ltd. organization, representing the interest and views of the parties that have a vested interest in the development of policies and principles regarding the content and functioning of the certification program.

2. Scope

This document defines the mandate of the impartiality committee as it relates to the Imperial Bio Solutions Pvt. Ltd.'s Certification Program.

3. Responsibilities

The is responsible for

- Establishing and operating the impartiality committees as per the requirements of the present document
- Performing the analysis of risks to impartiality as per the requirements of (Risks to impartiality – Analysis Process)
- Facilitating the activities of the meeting ensuring the continued independence and impartiality of the committee at the meetings
- Determining whether a quorum is present
- Preparing the minutes of the meeting

4. Terms of Reference

- Certification Head of Imperial Bio Solutions Pvt. Ltd. has the responsibility for authorizing the terms of reference, duties and authorities of the impartiality committee.
- The Terms of reference of the impartiality committee are defined in the present document.


1) Impartiality Committee Structure

It is up to each Certification Head to determine how the impartiality committee is to be constituted in the specific country (see note below)

For those Certification division of Imperial Bio Solutions Pvt. Ltd.'s managing the group accreditations, impartiality committees will be established on the same basis as the other

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

committees, but the analysis of risks to impartiality should cover the risks inherent to the provision of certification services in other countries.

Note: In the cases where a management team is responsible for Imperial Bio Solutions Pvt. Ltd. in more than one country and/or multiple certification division of Imperial Bio Solutions Pvt. Ltd.'s in a given country, the impartiality committee cover all the certification division of Imperial Bio Solutions Pvt. Ltd.'s managed by that team.

2) Roles and Responsibilities of the Impartiality Committees

The impartiality committees are to provide Imperial Bio Solutions Pvt. Ltd.'s management with information and advice regarding the following:

- The development of policies relating to the impartiality of Imperial Bio Solutions Pvt. Ltd.'s Activities.
- The matters affecting confidence in certification including openness and public perception.
- The review of the impartiality of Imperial Bio Solutions Pvt. Ltd.'s audit, certification and decision-making processes.
- The measures necessary to ensure the impartiality and independence of Imperial Bio Solutions Pvt. Ltd. related to commercial and other considerations
- The general and sector specific processes and procedures governing the audit and certification activities.
- The establishment of other committees, as required, to provide liaison between certification division of Imperial Bio Solutions Pvt. Ltd. and the industry and/or to satisfy accreditor's program specific requirements.

The impartiality committees is responsible for providing advice, support and vigilance as it applies to the certification activities of the Imperial Bio Solutions Pvt. Ltd.'s under their "jurisdiction". The outputs of the impartiality committees meetings, including any recommendations, are to be forwarded to Certification Head and Boards of Directors.

If the advice of the committee related to the "impartiality of the certification activities" is not respected, the committee has the responsibility and authority to inform relevant authorities, accreditation bodies, other concerned stakeholders While maintaining the confidentiality as required with respect to the certification body and it's clients.


3. Composition of the Impartiality Committees

3.1 External parties

Certification division of Imperial Bio Solutions Pvt. Ltd. 's CERTIFICATION HEAD shall identify for their respective impartiality committee, the interested parties and invite

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

representatives of the key interested parties to join the committee. The composition of the impartiality committee shall be such that no single interest predominates and that it covers the sectors of operations of the Imperial Bio Solutions Pvt. Ltd. 's in terms of certification activities, volume of work and geographical coverage (significant presence only). A minimum of 3 external members, representing 3 different interested parties, shall compose the “external” membership of each Impartiality Committee.

Potential interested parties may include:

- Clients of certification division of Imperial Bio Solutions Pvt. Ltd. ;
- Customers of Certification division of Imperial Bio Solutions Pvt. Ltd. 's clients;
- Representatives of Industry Trade Associations;
- Representatives of governments (regulatory bodies & other services);
- Representatives of non-governmental organizations;
- Consumer organizations;
- Consultant/ Service Provider of the Organic Sector
- Representative of Academic institutions related to agriculture.

Composition of the impartiality committees, in terms of external members and represented interested parties, shall be reviewed prior to each meeting to ensure the committee still represents a proper balance of interests. It is the responsibility of each committee member to inform certification division of Imperial Bio Solutions Pvt. Ltd. of any change in their professional functions that could affect their competence in representing their interested party. Prior to each meeting, external members of the impartiality committees will be required to confirm if their resumes are up-to-date or to provide certification division of Imperial Bio Solutions Pvt. Ltd. with amended copies of their resumes.


Committee members may have to be replaced in the case of change of circumstance that would affect their ability to remain impartial or to represent their interested party, or if they decide to resign. In such cases, Imperial Bio Solutions Pvt. Ltd. should try to fill in the position prior to the following meeting. The composition of the impartiality committees shall be documented

3.2 Certification division of Imperial Bio Solutions Pvt. Ltd. 's Representatives

The Certification Head is certification division of Imperial Bio Solutions Pvt. Ltd. 's representative although other certification division of Imperial Bio Solutions Pvt. Ltd. 's management personnel may also participate, they are to be considered as a single interest and certification division of Imperial Bio Solutions Pvt. Ltd. enjoys one unique voting right only.

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

3.3 Competence Requirements

Prior to their confirmation as external member of the Impartiality Committee, candidates shall submit a current version of their resume for certification division of Imperial Bio Solutions Pvt. Ltd. 's management to verify if they satisfy the relevant competence criteria and if they can duly represent the interested party. Once confirmed, committee members will be required to sign the proper (IBSPL-CD-ANX-07- Non-Disclosure and Confidentiality Agreement)

All external members of the Impartiality Committees also need to be familiar with the applicable Accreditation Bodies and Sector Authority Organizations requirements, and Certification division of Imperial Bio Solutions Pvt. Ltd. 's certification program. Prior to their first participation to an impartiality committee activity, each individual shall participate to an induction session.

The external impartiality committee members will be provided with access to all documents necessary to enable them to fulfil their duties, including Imperial Bio Solutions Pvt. Ltd. 's Manual.

3) Meetings

4.1 Planning of meetings

Impartiality committee meetings are to be held at least once a year to conduct a review of the impartiality of certification division of Imperial Bio Solutions Pvt. Ltd. 's audit, certification and decision-making processes and provide Certification division of Imperial Bio Solutions Pvt. Ltd. 's management advice and assistance on matters related to impartiality.

Prior to each meeting, the Certification Head shall ensure that the results of the analysis of threat to impartiality are up-to-date and that any change in terms of risks has been identified and properly assessed. The Certification Head is responsible for convening the impartiality committee meetings in such a way that the feed-back from the committee will be available in time for the management review.

Meetings may be held either by convening the impartiality committee members to attend


- Physical meeting at one or multiple meeting locations;
- conference tele-call;
- virtual meeting
- or a combination of above.

An agenda supported by applicable information documentation, as required, is to be prepared for each meeting and forwarded to the members prior to the meeting.

4.2 Meeting Agenda

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 <p>IMPERIAL BIO SOLUTIONS</p>	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

The agenda of the annual meetings shall, at a minimum, cover:

- Feed-back regarding recommendations made during the previous impartiality committee meeting;
- Organizational changes;
- Review of Certification division of Imperial Bio Solutions Pvt. Ltd. 's policies and processes relating to impartiality;
- Review of the results of the analysis of threats to impartiality (Risks to Impartiality – Analysis Results)
- Review of the impartiality of certification division of Imperial Bio Solutions Pvt. Ltd. 's audit, certification and decision-making processes;
- Review of the results of the evaluation of certification division of Imperial Bio Solutions Pvt. Ltd. 's finances and sources of income and demonstration that commercial, financial and other pressures do not compromise certification division of Imperial Bio Solutions Pvt. Ltd. 's impartiality;
- Feed-back and advice on matters affecting the confidence and perception of the external parties;
- Recommendations from the Committee.

4) Ballots and voting rights:

If during the course of the discussions, agreement cannot be reached on a recommendation or a position, any member of the committee may ask for a vote. Unless secret ballot is specifically requested by the member asking for the vote, the vote can be taken by show of hands.


Regardless of the voting method, each external member of the committee has one voting right. This right cannot be delegated to a proxy. Certification division of Imperial Bio Solutions Pvt. Ltd. through its Committee members, enjoys one unique voting right.

A quorum shall consist of 50 percent of the total voting membership, including at least 2 external members.

- a. Decisions on all formal motions shall be established by a two-thirds majority of those present, provided the affirmative votes constitute a minimum of 50 percent of the total voting membership.
- b. Where such a motion has obtained two-thirds majority of those present but lacks the 50 percent of total voting membership, the decision shall be so noted and either deferred to the next meeting or submitted by letter ballot to the whole membership for approval.
- c. In the event of a tie, there is no casting vote and a re-vote has to be taken.

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

5) Records of meeting

The Certification Head are responsible for preparing and maintaining the records of the impartiality committee meetings being held. These records shall be distributed to all committee members by the Quality Manager.

6) Management of Impartiality:

Certification division of Imperial Bio Solutions Pvt. Ltd. considers following threats to impartiality:


- 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/ Organic standards of a client to whom the certification body provided management systems/ Organic standards 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 arises 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.

7) Following principals are maintained:

- a. Certification division of Imperial Bio Solutions Pvt. Ltd. ensure that certificates are only issued after review by certification committee to make sure that no interest shall predominate.
- b. Certification division of Imperial Bio Solutions Pvt. Ltd. does not offer (and has never offered) any internal audit service to companies or individuals.
- c. Certification division of Imperial Bio Solutions Pvt. Ltd. does not offer (and has never offered) management system consultancy or any other form of ORGANIC STANDARD consultancy to companies or individuals.
- d. Certification Division of Imperial Bio Solutions Pvt. Ltd. services have no interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system/ ORGANIC STANDARD consultancy. If it is known that any organization had linked its activities with certification division of Imperial Bio Solutions Pvt. Ltd. services, action will be taken to rectify the same.
- e. Certification division of Imperial Bio Solutions Pvt. Ltd. does not have (and will not form) any relationships with companies who offer consultancy, internal audit services or other

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD


 <p>IMPERIAL BIO SOLUTIONS</p>	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

services that can be construed as having an impact on the certification services provided by certification division of Imperial Bio Solutions Pvt. Ltd. . Any proposed relationship between certification division of Imperial Bio Solutions Pvt. Ltd. and any other company will undergo a risk assessment by the impartiality committee prior to that relationship being formalized (Risks to Impartiality – Analysis Results)

- f. 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. The risk assessment will be undertaken by the impartiality committee.
- g. Individuals employed by or otherwise contracted to certification division of Imperial Bio Solutions Pvt. Ltd. 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 certification division of Imperial Bio Solutions Pvt. Ltd. to be declared. Certification division of Imperial Bio Solutions Pvt. Ltd. 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. The risk assessment will be undertaken by the impartiality committee.
- h. Where any past relationship has existed, Certification division of Imperial Bio Solutions Pvt. Ltd. will not allocate a member of staff or sub-contractor to a management system/ Organic standard audit. Exceptionally and at the discretion of the Certification Head 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.
- i. The risk assessment will be reviewed by the impartiality committee.
- j. Certification division of Imperial Bio Solutions Pvt. Ltd. services have not any interests & will not be linked with the activities of an organization (financially or otherwise) that provides management system/ORGANIC STANDARD consultancy. If it is known that any person or organization is making inappropriate claims stating or implying that certification would be simpler, easier, faster, or less expensive, than that person or organization will be warned for not doing so & if required, legal action will be taken.
- k. Activities of all employees will be reviewed at least annually to ensure that they remain impartial when conducting audits.
- l. Auditors / inspectors and others involved in the certification process are not and will not be put under any pressure (e.g. targets to increase clientele, any financial pressure etc.) and will not be influenced in any way to come to a particular conclusion regarding the result of an

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD


 IMPERIAL BIO SOLUTIONS	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

audit.

- m. Certification division of Imperial Bio Solutions Pvt. Ltd. retains authority of certification decisions.
- n. If auditor / inspector has delivered any management system training, including ORGANIC STANDARD etc., or any other training to an organization, he or she cannot be involved in certification process of that organization for next six months from the date of training.
- o. To avoid familiarity threat, auditors / inspector / reviewers are reshuffled at regular time frames, i.e. an auditor / inspector / reviewer cannot audit/review same organization for more than 2 certification cycles.
- p. Certification division of Imperial Bio Solutions Pvt. Ltd. does not pay any commissions or does not give any targets to anybody, for example any clients, marketing agencies, consultants etc.
- q. Certification division of Imperial Bio Solutions Pvt. Ltd. requires personnel; internal and external; to reveal any situation known to them that may present them or the certification body with a conflict of interests. This is done as follows:
 - a. policy is made known to them while appointment
 - b. before appointment they are asked for at least two references of previous employers & certification division of Imperial Bio Solutions Pvt. Ltd. investigates about the candidate via written or telephonic conversation from those references.
 - c. if required, investigation is done by our contacts in industries.
 - d. while recruitment, details regarding the organizations that employ them or any projects in which they have involve previously will be taken in a prescribed format for resume or log sheets.
 - e. Before audit, auditor / inspector , reviewer, technical expert or any external expert (including auditor / inspector , reviewer or technical expert) will have to give details about non-conflict of interest & make a commitment for it by signing (IBSPL-CD-ANX-07- Non-Disclosure and Confidentiality Agreement)
 - f. After audit, Feedback about the auditor is collected through the (IBSPL-CD-FRM-82- Client Feedback Form).
 - g. Verbal feedback from audit team members is also taken.
 - h. Apart from above requirements, all employees of Certification division of Imperial Bio Solutions Pvt. Ltd. , permanent or empaneled, have to sign (IBSPL-CD-ANX-07- Non-Disclosure and Confidentiality Agreement), (IBSPL-CD-ANX-02- Code of Conduct)

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD

 <p>IMPERIAL BIO SOLUTIONS</p>	Imperial Bio Solutions Pvt. Ltd.	Doc no.	IBSPL-CD-SOP-10
	Procedure for Safeguarding Impartiality	Issue no.	01
		Issue date	15.03.2022
		Revision no.	00
		Revision date	00

annually by permanent staff and before every audit or certification tasks by empaneled staff. Certification division of Imperial Bio Solutions Pvt. Ltd. use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and does not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interests.

Also, Certification division of Imperial Bio Solutions Pvt. Ltd. has identified, analyzed & documented the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationship .

5.8 Action in case of conflict of interest/ impartiality:

In case Certification division of Imperial Bio Solutions Pvt. Ltd. came to know about any conflict of interest situation or any other situation which is affecting the impartiality and it is proven based on investigation, following action may be taken on the case to case basis-

- Employee auditor / inspector - Show- cause notice will be given and in the absence of justifiable cause the services will be terminated and name will be black listed for any future engagement.
- Contract auditor / inspector contract will be cancelled. Name will be barred from any future engagement related to the entire organizations.
- Certificated site- certificate will be suspended and time will be given for taking corrective actions and showing improvement or certificate will be withdrawn.
- Any other employee- Show- cause notice will be given and in the absence of justifiable cause the services will be terminated and name will be black listed for any future engagement.
- Consultant- Name will be barred from any future engagement related to the entire organization. No site associated with this consultant will be accepted for auditing and certification.
- Any other stakeholder/entity- Communication will be made to clarify their position. In case of not receiving any justifiable clarification, legal notice will be served and legal proceeding will be started in the court of law.

6.0 Records

- IBSPL-CD-ANX-07- Non-Disclosure and Confidentiality Agreement
- IBSPL-CD-FRM-82- Client Feedback Form

APPROVALS:

PREPARED BY	APPROVED BY
QUALITY MANAGER	CERTIFICATION HEAD