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| Certification Section | Specialty Conformity Certification Services<br>Exhibit – Impartiality policy | No.      | E/SYS/02   |
|                       |  | Rev. No. | 01         |
|                       |  | Date     | 15-02-2023 |

**Specialty Conformity Certification Services** is the legal entity responsible for certification of products; reference to **Specialty Conformity Certification Services** in this Policy and Public Statement refers to these legal entities.

**Specialty Conformity Certification Services** its Managing Director, Staff and Sub-contractors fully understand the importance of impartiality in undertaking its Certification of products. **Specialty Conformity Certification Services** 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.

- Certificate of conformity to the certified product is only issued after approval of authorized person, to ensure that no interest shall predominate.
- **Specialty Conformity Certification Services** does not have (and will not form) any relationships with companies who manufactures the product under certification. Any proposed relationship between **Specialty Conformity Certification Services** and any other company will undergo a risk assessment by the Managing Director for Impartiality prior to that relationship being formalised. Any current relationships with companies, organisations and individuals will be assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the certification of products.
- Individuals employed by or otherwise contracted to **Specialty Conformity Certification Services** are required to document and record their current and past relationships with all manufacturer / inspection agencies / testing laboratories / other where there are chances of conflict of interest considering the nature of activities. Any situation past or present, which may present a potential conflict of interest, is required by **Specialty Conformity Certification Services** to be declared. **Specialty Conformity Certification Services** 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.
- **Specialty Conformity Certification Services** will not appoint any employee or sub-contractor to the certification of products, where any past relationship has existed with the client. Exceptionally and at the discretion of the Certification Manager or Managing Director an individual or sub-contractor may be allocated to certification of products where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- **Specialty Conformity Certification Services** 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 certification of products.
  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.

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3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.

- **Specialty Conformity Certification Services** will ensure that it is not linked or marketed in any way which links it with the certification of products and will take appropriate action should any such link be identified.
- Certification personnel and others involved in the certification of products 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 certification of products.

**Specialty Conformity Certification Services Impartiality Norms:**

- **Specialty Conformity Certification Services** shall not recruit any person, whose relative are working at permanent (Means the client, who is giving regular business) client's place.
- No outsourcing of certification of products, who are already working for that client.
- No fees for referral are to be paid to any organization engaged in the similar activities.
- Adherence to all accreditation and other **Specialty Conformity Certification Services** policies.
- **Specialty Conformity Certification Services** shall not carry-out any other conflicting services other than its core business of certification of products.
- **Specialty Conformity Certification Services** shall not employ any professional conflicting its ethical policies.
- **Specialty Conformity Certification Services** shall not allow any of its certification personnel to market the services offered by organization. Only the dedicated personnel will be allowed for marketing of the services.
- **Specialty Conformity Certification Services** shall not allow any of its Certification personnel to carry out financial transactions with clients / sub-contractors.
- All employees of **Specialty Conformity Certification Services** shall disclose any situation impairing the business ethics.
- **Specialty Conformity Certification Services** will allocate the work to its certification personnel considering the defined time period. No over work / load will be given, which can cause chances of compromising the certification of products.
- Any unethical practice observed should be notified to the management at the earliest.
- **Specialty Conformity Certification Services** shall not allow any of its personnel to accept any gifts from client / sub-contractor.
- **Specialty Conformity Certification Services** shall not allow any Certification personnel to conduct certification activities for the organization where any of its family members / close relatives are involved at a decision making position.

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- Staff is prohibited from participating in the Certification of products of any organization to which they have given assistance, by 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.
- **Specialty Conformity Certification Services** direct employees are prohibited from engaging in consultancy activities, which involve the active manufacture / maintenance.
- **Specialty Conformity Certification Services** recognizes that the source of revenue is the client paying for certification of products, and that this is a potential threat to impartiality. Therefore, **Specialty Conformity Certification Services** 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 **Specialty Conformity Certification Services** 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. Decision on Inspection of product as well as decision on granting of Certificate of conformity are made and signed for by an Authorized person, who was not responsible for such activities, where there are chances of potential conflict of interest. **Specialty Conformity Certification Services** recognizes that threats to impartiality include the following.
  - Self-interest threats arising from a person 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.

**Public Statement (as it appears on Specialty Conformity Certification Services website)**

**SCC Certification Private Limited**, its Managing Director, Management Representative and Certification Manager, Staff and others involved in the certification of products of Organization fully understand the importance of impartiality in undertaking its Certification of products.

**Specialty Conformity Certification Services** will therefore ensure that in its dealings with clients or potential clients, all employees or other personnel involved in Certification of products are, and will remain, impartial.

To ensure that impartiality is both maintained and can be demonstrated, **Specialty Conformity Certification Services** has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.

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