

Date	10-05-2020
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Revision No.
1

Impartiality Policy Statement

AQC Group is a legal entity responsible for product certification activities; any reference to AQC Group in this Policy and Public Statement refers to this legal entity.

AQC Group, its Managing Director, Staff and Subcontractors fully understand the importance of impartiality in undertaking their Product certification activities. AQC Group 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 principles have been established:

- AQC Group issues certificates only after a review by an independent, authorized and competent member of the management team (who has not been involved in the evaluation), to ensure that no interest shall predominate.
- AQC Group does not offer (and has never offered) inspection and testing related to product certification or any other form of consultancy to clients.
- AQC Group does not offer (and has never offered) an internal evaluation service to its certified clients.
- AQC Group does not own nor has any interest (financial or otherwise) in any other company that offers certification or inspection and testing related to product certification services.
- AQC Group does not has (and will not form) any relationships with companies who offer consultancy or inspection and testing or other services that can be construed as having an impact on the certification services provided by AQC Group. Any proposed relationship between AQC Group and any other company will undergo a risk assessment by the Committee for Impartiality, prior to that relationship being formalized. 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 product certification process.
- Individuals employed by or otherwise contracted to AQC Group 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 AQC Group to be declared. AQC Group will use the information to identify any threats to impartiality and will not use those individuals in any capacity unless they can demonstrate that there is no conflict of interest.
- AQC Group will not allocate a member of staff or subcontractor to a management system evaluation where any past relationship has existed. Exceptionally and at the discretion of the Certification Manager or Managing Director, an individual or subcontractor may be allocated to a management system evaluation where a past relationship has existed but there has been no relationship for a minimum of two years.
- AQC Group 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:
 - i 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 paid will in no way affect the outcome of an evaluation.
 - ii 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 organization (normally an inspection and testing laboratory) requesting the commission for referrals.
 - iii All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- AQC Group does not offer specific inspection and testing to any company in respect of implementing a particular standard for that company. Any inspection and testing offered by AQC Group is general in nature and available to all clients, who wish to attend.
- AQC Group will ensure that it is not linked or marketed in any way which links it with the activities of an inspection and testing related to product certification and will take appropriate action should any such link be identified.
- Evaluators 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 evaluation.

AQC Group's Impartiality Norms:

- No outsourcing of evaluations to other inspection and testing laboratories.
- No referral fees to be paid to inspection and testing laboratories.
- Fact-based communication with clients / inspection and testing laboratories.
- Adherence to all accreditation and other policies of AQC Group
- AQC Group shall not carry out any other conflicting services other than its core business of certification.

Originator	Management Representative	AQC Group Pty Ltd	
Approved By	Managing Director		Page 1 of 3

Date	10-05-2020
No	PY03

Revision No.
1

Impartiality Policy Statement

- AQC Group shall not employ any professional conflicting its ethical policies.
- AQC Group shall not allow any of its evaluators to market the services and conduct the evaluations for the same client.
- AQC Group shall not allow any of its evaluators to carry out financial transactions with clients / inspection and testing laboratories.
- AQC Group shall not carry out business with any inspection and testing laboratories inducing pressures to compromise impartiality.
- All employees of AQC Group shall disclose any situation impairing the business ethics.
- AQC Group shall not allow any of the evaluators to carry out evaluations for the clients at least for 2 years from the date of relinquishment from their services for that client.
- AQC Group shall not allow any evaluators to compromise on the evaluation timing as required as per the accreditation / AQC Group's norms.
- AQC Group shall not allow any evaluators to conduct the evaluation for the client for which it has not been approved for.
- AQC Group shall maintain transparency with regard to all information.
- No evaluators shall divulge any confidential information of the client or to any third party without written consent from the client and approval by the Managing Director.
- No evaluators shall carry any client information with them after the usage period. All client information shall be returned after usage.
- Utmost care / verification shall be carried out for granting the right scope of certification.
- Any unethical practice observed shall be notified to the management at the earliest.
- AQC Group shall not allow any of its evaluators to accept any gifts from client / Inspection and testing Laboratories of value greater than \$50.
- AQC Group shall not allow any evaluators to conduct evaluation for the organization where any of their 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

NDIS Scheme Specifics

- All audit team members will sign a conflict of interest declaration before every audit and disclose any situation impairing the business ethics.
- AQC Group will not provide training to NDIS providers, auditors or contractors on content that relates the NDIS Practice Standards or the National Disability Insurance Scheme (Quality Indicators) Guidelines 2018.
- Gap analysis is an optional exercise that ascertains the degree of readiness of an NDIS provider to proceed to certification audit by identifying gaps that may need addressing prior to the audit. Gap analysis can be conducted by an auditor who will not be conducting the actual certification audit.
- Where AQC Group has provided gap analysis to an NDIS provider, AQC Group will not provide auditing services to that provider for period of at least years following the completion of the gap analysis.
- Where an audit team member has provided gap analysis to an NDIS provider, AQC Group will not allow that audit team member to provide auditing services to that provider for period of at least years following the completion of the gap analysis.
- AQC Group will 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.
- AQC Group will provide in-house training to its staff on its internal processes in relation to the NDIS Scheme. The in-house training can be delivered by staff member who has attended the Commission's auditor training.

Originator	Management Representative	AQC Group Pty Ltd	
Approved By	Managing Director		Page 2 of 3

Date	10-05-2020
No	PY03

Revision No.
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Impartiality Policy Statement

Public Statement

AQC Group, its Managing Director, Managers, Staff and others involved in the certification of persons fully understand the importance of impartiality in undertaking its product certification activities.

AQC Group will, therefore, ensure that in its dealings with clients or potential clients, all employees or other personnel involved in product certification activities are, and will remain, impartial.

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

Originator	Management Representative	AQC Group Pty Ltd Page 3 of 3	Signature
Approved By	Managing Director		