

Global Certification and
Monitoring Services

MECHANISM FOR
SAFEGUARDING
IMPARTIALITY

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GCMS
Global Certification and Monitoring Services

SCOPE

Global Certification and Monitoring Services (hereinafter GCMS) provides Halal certification services for a wide range of markets and areas. GCMS is responsible for all decisions related to the provision, refusal, control, scope expansion/reduction, suspension and withdrawal of its Clients' Halal certification.

Our goal is to provide services that are fully consistent with the principles of justice, responsibility, confidentiality and impartiality. We guarantee that in our organisation conflicts of interest are avoided or successfully resolved with full responsibility and openness.

We strive to ensure that our certification process meets international requirements and standards.

Our certification processes are constantly reviewed and improved to increase the effectiveness of the Management System defined in the Quality Management System documents.

1. GCMS'S IMPARTIALITY PHILOSOPHY

- 1.1 Effective impartiality management is one of the most important aspects of providing high-quality certification services that our Clients and the community can rely on. We must understand and address the threats of impartiality in order to maintain the objectivity of our actions.
- 1.2 We seek to ensure that:
 - a. impartiality is an integral part of all aspects in the certification process within GCMS.
 - b. commercial, financial or other pressures do not affect certification decisions within GCMS.
 - c. threats to impartiality are successfully identified and addressed by GCMS.
 - d. we consult with relevant stakeholders of GCMS on issues related to impartiality.
- 1.3 GCMS ensures its Top Management and staff are free from any commercial, financial and other pressures which might influence the results of the certification process and does not offer or provide advice in Halal or consultancy in Quality or any other management system. The Top Management of GCMS has issued and signed the Impartiality Declaration that drives all activities and decisions of the GCMS and was communicated to all personnel of GCMS.

2. PRINCIPLES OF IMPARTIALITY

- 2.1 Threats to impartiality may arise from a number of sources:
 - a. manipulation on certification fees (a potential Client may offer a higher fee in order to obtain a Halal certificate);
 - b. pressure during certification audits (auditors may be offered a bribe for better audit results);

- c. trust and acquaintance with people in the certification process;
- d. intimidation, offers of bribery or other unacceptable behaviour from the Clients' side (real or perceived), aimed to influence the decision on certification.

2.2 To this end, GCMS is committed to identify and adequately address threats to impartiality:

- a. GCMS is an independent group of entities and does not form a part of any other legal entities and/or organisations.
- b. salaries of GCMS's employees do not depend upon the commercial or any other success of any specific commercial activity of GCMS.
- c. Halal Certification documents are regularly evaluated by the GCMS's Shariah Committee and Impartiality Committee.
- d. all GCMS's employees sign confidentiality and code of ethics agreements.
- e. participants of GCMS's certification activities shall sign the Independence Document to commit to being free from any commercial, financial and other internal and external pressures that may adversely affect the quality, accuracy or impartiality of their work.
- f. GCMS's personnel is required to report all threats, offers of bribery or potential conflicts of interest to the GCMS's Impartiality Committee as well as the Top Management of the GCMS.
- g. the Top Management of the GCMS is obliged to investigate each report and take appropriate actions, such as termination of cooperation with a compromised Client, removal/dismissal of compromised personnel, report to the relevant authorities, legal processes, etc.
- h. the personnel involved in Halal Certification activities should not have personal relationships with the personnel of the Client. If there is such a relationship, an employee should immediately inform the Top Management of GCMS Impartiality Committee about this and should be suspended from work with this Client.
- i. all GCMS personnel is regularly trained on impartiality as a part of GCMS's training program.
- j. the decision on certification is taken by the Decision Committee of GCMS, members of which are not involved in the certification process itself and, when making decisions, rely on information provided by the Halal Certification Unit.
- k. an impartiality risk assessment is periodically (at least once a year) carried out by the GCMS's Impartiality Committee to ensure that risks are minimised and controlled.
- l. no commercial or financial pressure is allowed within GCMS. In case of such pressure, the employee who is exerted such pressure should immediately inform the GCMS's Impartiality Committee about this. In turn, the GCMS's Impartiality Committee is obliged to investigate each such report and take appropriate actions to resolve the risk that has arisen, in a way such as the removal/dismissal of compromised personnel, a report to the relevant authorities, legal processes.
- m. The activities of GCMS's Clients/subcontractors/Partners are regularly assessed on impartiality risks. If such risks are found, the GCMS's Top Management and the GCMS's Impartiality Committee develop and implement measures to reduce/eliminate risks, such as:

additional clauses in service/cooperation agreements, termination of cooperation with a compromised Client/subcontractor/Partner, report to the relevant authorities, legal processes, etc.

- n. GCMS's personnel cannot be used to provide certification services or make a certification decision for a product for which they have provided consultancy for a period of 2 (two) years since the provision of the consultancy.

2.3 To avoid any potential threats to impartiality GCMS does not:

- a. provide any advisory services to any organisations to avoid conflicts of interest.
- b. design, manufacture, install, distribute or maintain products of the type it evaluates.
- c. provide any other products or services which are similar to the type it certifies which could compromise the confidentiality, objectivity or impartiality of its evaluation processes and decisions.
- d. advise or provide consultancy services to the Clients as to methods of dealing with barriers to the desired certification.
- e. advise or provide management system consultancy or internal auditing to its Clients.
- f. stand on the side of its Clients/Partners in any disputes, litigations or other events requiring giving recommendations to the Client/Partner.
- g. provide certification services to other Halal certification bodies.
- h. recommend any organisation to a Client for consultancy purposes. The activities of GCMS cannot marketed or linked with any organisation which activities are defined in this clause.

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3. IDENTIFICATION OF RISKS

By identifying risks, GCMS can recognise, analyse, document and minimise/eliminate potential conflicts of interest and impartiality risks that arise during certification process and/or arising from this activity. The GCMS's Impartiality Committee regularly (at least once a year) identifies and analyses the risks of impartiality according to the following scheme:

- a. through brainstorming and SWOT analysis, the GCMS's Impartiality Committee and all GCMS's staff identify all potential impartiality risks, regardless of the existing measures to minimise and control them.
- b. the GCMS's Impartiality Committee uses the results of brainstorming and SWOT analysis to identify current risks, by analysing each result, and adding them to the risk tables regardless of the existing measures to minimise and control these risks.
- c. by the root cause analysis method, each identified risk is assigned a category of probability of its realisation (from low to high).
- d. by the root cause analysis method, each identified risk is assigned a consequence severity score in the event of a risk occurrence (from low to high).

- e. total risk score is a result of multiplying risk probability by risk severity.
- f. for medium and high probability risk scores, risk minimisation measures shall be established. If these measures are already implemented within the organisation, they are put in the corresponding column of the risk table. In the absence of these measures in the organisation for a specific risk, risk minimisation measures developed by the GCMS's Impartiality Committee are confirmed with the GCMS's Top Management as well as the Top Management of GCMS and are carried out by responsible employees within GCMS.
- g. after the identification, development and implementation of risk minimisation measures, the reassessment of risk score is carried out. During the reassessment, the risk score should not exceed the middle category. If it is not possible to achieve this level through risk minimisation measures, it is necessary to assemble a council consisting of GCMS's Top Management members, GCMS's Impartiality Committee members and GCMS's Shariah Committee members and either to develop the effective methods to minimise the risk or to stop or reduce activities related to this risk.
- h. all identified risks should be continuously monitored and controlled by the GCMS's Impartiality Committee and Top Management until the next event of identification, evaluation, analysis and minimisation of impartiality risks.

4. RISK CONTROL

- 4.1. In order to safeguard the integrity and reputation of GCMS it takes actions to respond to any identified risk to impartiality. In the event of impartiality risks' identification, GCMS takes immediate actions to eliminate or minimise these risks:
- a. restrictions may be imposed on compromised personnel and/or Clients, personnel who have any identified risks to impartiality shall be subject to restrictions on work assignments.
 - b. change of staff if the original staff is compromised.
 - c. labour and/or certification agreements may be suspended or terminated.
 - d. making changes to the organisational activity, for example, the exclusion of the most critical areas.
 - e. the identified threats to impartiality may be reported to the relevant authorities.

4.2. Top Management

GCMS's Top Management is required to accept all reports of potential threats to impartiality. These reports should be examined by taking all necessary actions to determine whether they are reasonable. In case of a violation of the impartiality principles, immediate actions are required in order to eliminate the threat and prevent its occurrence in the future.

4.3. GCMS's Shariah Committee

GCMS's Shariah Committee is responsible for the periodical review of Clients' audit reports submitted by the Halal Certification Unit. The members of the GCMS's Shariah Committee compare these reports to the information provided in the Clients' documents and in case of any incompatibilities have the right to ask the auditors questions and report these incompatibilities to the Head of the Halal Certification.

4.4. GCMS's Impartiality Committee

The GCMS's Impartiality Committee consists of representatives from various interested parties. The Committee is responsible for the regular internal reviews. If risks or problems are discovered, the report is sent to the GCMS's Top Management for it to take immediate actions. The Committee has the authority to report violations of impartiality to all authorised bodies outside the organisation (accreditation bodies).

4.5. Head of Halal Certification

The GCMS's Head of Halal Certification is responsible for the ongoing monitoring of all GCMS auditors' work. In the event of any suspicion of a violation of the impartiality principles, has the right to take all necessary actions to investigate the problem and collect all the necessary information for the problem to be solved by the GCMS's Top Management.

4.6. Auditors

Are responsible for the performance of their work based on the principles of honesty, justice and impartiality. In case of any pressure or any attempts to violate the principles of confidentiality from the Client, are obliged report the violation of the impartiality principles to the GCMS's Top Management.

5. ADMINISTRATION POLICY

This Mechanism should be annually reviewed and approved by the Top Management of GCMS.

ANNEX 1 – VERSION HISTORY

<u>Version, date</u>	<u>Responsible person</u>	<u>Clause</u>	<u>Amendments</u>
V1, 01/05/2025	Jekaterina Azimova	-	Initial document created



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