

Global Certification and Monitoring Services

Procedure of management of impartiality

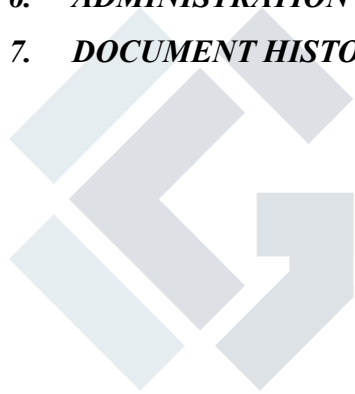


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GCCMS
Global Certification and Monitoring Services

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GCMS
Global Certification and Monitoring Services

SCOPE

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

Our goal is to provide services that are fully consistent with the principles of justice, responsibility, confidentiality and impartiality. We guarantee that in our organization 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 GROUP'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 all GCMS subsidiaries.
 - b. commercial, financial or other pressures do not affect certification decisions within any GCMS subsidiaries.
 - c. threats to impartiality are successfully identified and addressed within all GCMS Group.
 - d. we consult with relevant stakeholders of all GCMS subsidiaries on issues related to impartiality.
- 1.3 GCMS Group 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/consultancy in Quality or any other management system. The top management of GCMS has issued and signed the Impartiality Declaration that drives all activities of the relevant GCMS subsidiary 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 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 Group is committed to identify and adequately address threats to impartiality:

- a. GCMS Group is an independent group of entities and does not form a part of any other legal entities and/or organisations.
- b. salaries of GCMS Group's employees do not depend upon the commercial or any other success of any specific commercial activity of the GCMS Group or any of its subsidiaries.
- c. Certification documents are regularly evaluated by the GCMS decision-maker and Impartiality Committee.
- d. all GCMS Group's employees sign confidentiality and code of ethics agreements under the relevant GCMS subsidiary.
- e. participants of GCMS Group'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 Group's personnel is required to report all threats, offers of bribery or potential conflicts of interest to the GCMS Group's Impartiality Committee as well as the Top Management of the relevant GCMS subsidiary.
- g. the Top Management of the relevant GCMS subsidiary 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 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 the relevant GCMS subsidiary and the GCMS Group's Impartiality Committee about this and should be suspended from work with this Client.
- i. all GCMS Group's personnel is regularly trained on impartiality as a part of GCMS Group's training program.
- j. the decision on certification is taken by the Decision maker assigned at the GCMS headquarter, who was not involved in the evaluation process itself and, when making decisions, rely on information provided by the Certification Unit of the relevant GCMS subsidiary.
- k. an impartiality risk assessment is periodically (at least once a year) carried out by the GCMS Group's Impartiality Committee to ensure that risks are minimized and controlled.
- l. no commercial or financial pressure is allowed within the GCMS Group. In case of such pressure, the employee who is exerted such pressure should immediately inform the GCMS Group's Impartiality Committee about this. In turn, the GCMS Group'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 Group's Clients/subcontractors/Partners are regularly assessed on impartiality risks. If such risks are found, the GCMS Group's Top Management and the GCMS Group'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 Group'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 Group does not:

- a. provide any advisory services to any organizations 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 certification bodies.
- h. recommend any organization to a client for consultancy purposes. The activities of GCMS Group cannot be marketed or linked with any organization which activities are defined in this clause.

3. IDENTIFICATION OF RISKS

By identifying risks, GCMS Group can recognize, analyze, document and minimize/eliminate potential conflicts of interest and impartiality risks that arise during certification process and/or arising from this activity. The GCMS Group regularly (at least once a year) identifies and analyses the risks of impartiality according to the following scheme:

- a. Through brainstorming, the GCMS Group's Impartiality Committee and all GCMS Group's staff identify all potential impartiality risks, regardless of the existing measures to minimize and control them.

- b. The GCMS Group's Impartiality Committee uses the results of brainstorming used to identify current risks, by analyzing each result, and adding them to the risk tables regardless of the existing measures to minimize and control these risks.
- c. By the root cause analysis method, each identified risk is assigned a category of probability of its realization (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 minimization measures shall be established. If these measures are already implemented within the organization, they are put in the corresponding column of the risk table. In the absence of these measures in the organization for a specific risk, risk minimization measures developed by the GCMS Group's Impartiality Committee are confirmed with the GCMS Group's Top Management as well as the Top Management of each GCMS subsidiary and are carried out by responsible employees within the GCMS Group.
- g. after the identification, development and implementation of risk minimization 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 minimization measures, it is necessary to assemble a council consisting of the GCMS Group's Top Management members, the Top Management of each GCMS subsidiary, the GCMS Group's Impartiality Committee members and either to develop the effective methods to minimize 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 Group's Impartiality Committee, GCMS Group's Top Management and the Top Management of each GCMS subsidiary until the next event of identification, evaluation, analysis and minimization of impartiality risks.

4. RISK CONTROL

4.1. In order to safeguard the integrity and reputation of GCMS Group it takes actions to respond to any identified risk to impartiality. In the event of impartiality risks' identification, GCMS Group takes immediate actions to eliminate or minimize 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 organizational activity, for example, the exclusion of the most critical areas.
- e. the identified threats to impartiality may be reported to the relevant authorities.

5. PERSONS INVOLVED IN THE MECHANISM OF SAFEGUARDING IMPARTIALITY

5.1 Top Management

GCMS Group's Top Management as well as Managers of each GCMS subsidiary 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.

5.2 GCMS Group's Quality Manager

GCMS Group's Quality Manager is assigned as a secretary for the impartiality committee to record the minutes of meeting and the outcomes of the impartiality committee.

5.3 Certification Manager

The GCMS Group's Certification Manager is responsible for the ongoing monitoring of all GCMS Group 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 Group's Top Management.

5.4 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 Top Management of the relevant subsidiary.

5.5 GCMS Group's Impartiality Committee

The GCMS Group's Impartiality Committee consists of representatives from various interested parties from each of the countries in which GCMS subsidiaries are established.

- Client representative for system certification (9001; 14001; 45001; etc...)
- Client representative for product certification (Global GAP; Organic;)
- Local governmental expert and/or Notification authority representative
- Expert in certification
- Non-governmental organization representative (Example: consumer protection; Federation of agriculture; etc....)
- Consumers/ End users
- GCMS representative (without vote)

Additional members are required for Halal certification (OIC/SMIIC):

- Client representative Halal
- Shariah expert

The Committee is responsible for the regular internal reviews. If risks or problems are discovered, the report is sent to the GCMS Group's Top Management or to the Top Management of the relevant GCMS subsidiary 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).

6. ADMINISTRATION POLICY

Any person involved in the mechanism of impartiality shall have knowledge and experience in the management of impartiality with a similar activity of GCMS. All members shall acknowledge the rules of the mechanism of safeguarding impartiality, shall sign a commitment letter and a confidentiality agreement to accept to be a member within the term of reference.

Every meeting of the impartiality meeting must be planned, and its outcomes must be recorded

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

7. DOCUMENT HISTORY

Version number	Description	Date
01	First release	2025-04-28
02	Chnged the name of the procedure	2025-08-08
03	Added history of the document.	2025-12-02