

IMPARTIALITY

Process Description	Designation	Signature
Approved by	Director – Technical	
Issued & Controlled by	Chief Officer	
Prepared by	System Coordinator	

ALSTA INSTITUTE OF WELDING TECHNOLOGY PRIVATE LIMITED, all rights reserved. This document may contain proprietary information and may only be released to third parties with approval of management. Document is uncontrolled unless otherwise marked; uncontrolled documents are not subject to update notification.



1. Purpose

This procedure describes the measures that AIWTPL and its employees and Impartiality Board undertake to identify, analyze, evaluate, treat, monitor and document the risks related to conflict of interests arising from provision of certification including any conflicts arising from its relationship on an ongoing basis.

2. Scope

This procedure is applicable to all personnel involved in AlWTPL as well as subcontractors and impartiality board members and covers the activities of AlWTPL's Certification.

3. Responsibilities

4. Management of Impartiality

AIWTPL Director-Technical is committed to safeguard and protect impartiality in all certification activities. A declaration with regards to Impartiality is being provided Director-Technical.

The Director - Technical reviews the activities of the organization and verifies that no conflicts exist due to any business relationships. Where identified any residual risk, the Director - Technical will also determine whether it is acceptable or not. This review is documented as part of the management review.

5. Procedure Description

5.1 Identification of Potential Conflicts of Interest

AIWTPL, applicants, candidates and certified person are committed to avoid any situation that could cause a conflict of interest. This effort covers all potential sources of conflict of interests that are identified, whether they arise from AIWTPL or from the activities of any other person/s, such as sub-contractors or organization/s. Threats to impartiality can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new customers.

AIWTPL is ensure that the policies and procedures for certification service is fair among all the applicants, candidates and certified persons.

Where there are any threats to impartiality, AIWTPL documents and demonstrate how it eliminates or minimize such threats and documents any residual risks. Some of the methods adopted by AIWTPL for documenting these actions are, but not limited to:

- Statements on AIWTPL manuals and procedures
- Attendance lists of Trainings;
- Agreements;
- Risk Analysis (financial risk report);
- Records of investigation
- Meeting Minutes (e.g. management Review, impartiality board meeting, etc.)

5.2 Measures to Eliminate or Minimize Potential Threats

Measures taken by AIWTPL in preventing situations concerning conflict of interest include:

- Training -To ensure that all personnel working within or for the organization are aware of the potential risk of conflict of interest;
- Define measures in certification procedures;
- Commitment to maintaining Impartiality in the contract with AIWTPL's customer;



ALSTA INSTITUTE OF WELDING TECHNOLOGY PRIVATE LIMITED ADVANCE ENGINEERING INSPECTION SERVICES #20, Bharathi Nagar, Gerugambakkam, Chennai - 600 128, Tamil Nadu, India

IMPARTIALITY PROCEDURE - QSP - 06

- Ensure that no conflict of interest exists during the selection of Examinor & Assessor.
- Immediately investigate the details of any situation that may be perceived as a potential risk to conflict of interest or threat to impartiality.
- Performs a Risk Analysis of its certification process as documented in List of Risk on Threat, Action plan and Opportunities (Doc. No. : F/TM/04).

5.3 Impartiality on the Services

AIWTPL does NOT:

- Provide certification services to any other Certification Bodies which involve certification services
- Include the training and consultancy divison into certification divison:
- Provide certification services to any organization where a relationship with AIWTPL poses a threat to impartiality;
- Outsource the certification process required by any other certification organization.
- Offer its services in such a way that the certifying personnel has the impression that he would gain advantages if a specified Training agency were used.

5.4 Impartiality of Finances and Sources of Income

AIWTPL performs annual evaluations of its finances and sources of revenue to demonstrate on ongoing basis that commercial, financial or other pressures do not compromise its impartiality. AIWTPL maintains third party certified yearly balnce sheet, that shows they are financially strong and carrying out business mare than a decade. Section of the amount is credited back in the bank as fixed deposit annually.

The balance sheet provided by the independent third party accounting firm can demonstrates AIWTPL's finances are sound and that there are no commercial, financial or other pressures that may compromise its impartiality. It includes information regarding sales by AIWTPL, revenue from customer and customer type (Certified person and industry), and general information about profitability and cash flow.

The annual balance sheet is presented to the Impartiality Committee. As with other aspects of impartiality, the Committee understands its role in the financial review and their responsibility for questioning aspects of the report that may compromise impartiality.

5.5 Impartiality of AIWTPL Certification Personnel

Before providing certification on behalf of AIWTPL, all employee whether permanent or contract is required to sign Non Disclosure Agreement where he/she commits to disclose to AIWTPL any relationship that may suggest a conflict of interest and/or threat to impartiality. Contract employee who become aware that they have been, in previous times, employed or otherwise associated with a AIWTPL Client, will bring this to the attention of the Director – Technical or Chief Officer.

AIWTPL shall not certify any person who have unacceptable relationship, between any of the employees of AIWTPL especially with examinor or assessor or decison making personnel, for a minimum period of two years following the end of activities associated with the certification or where there is an unacceptable threat to the impartiality of the certification process.

All AIWTPL employees or subcontracted examinor/assessor are not allowed to consult with the client before, during or after the audits.

All AlWTPL employee or subcontracted Examinor/Assesors are required to sign and submit a declaration form for each examination confirming that there is no conflict of interests regarding the examination which he or she is going to conduct and that there are no potential concern/s which needs to be communicated to AlWTPL.



5.6 Disciplinary Actions

Employees may be subjected to disciplinary actions and may include termination of employment, if impartiality requirements are not met.

Subcontractors are subjected to temporary suspension of services, may include cancellation of contracts and termination of all relationships with AIWTPL, if impartiality requirements are not met

Other person, body, and organization not previously covered may be subject to appropriate action, including legal action, in order to ensure that the integrity and impartiality of AIWTPL's certification program is not compromised.

6. Committee for Safeguarding Impartiality (Impartiality Board)

An Impartiality Board has been established to provide independent review and oversight of personnel certification activities.

6.1 Composition of the Impartiality Committee

The Impartiality Committee includes representation of a balance of interests such that no single interest predominates. AIWTPL employees are considered as a single interest and shall not predominate the Impartiality Board.

Although the board cannot represent every interest, AIWTPL will identify and invite key interests. Such interests can include (but not limited to):

- AIWTPL clients
- Representative from Cluster of certified personnel by AIWTPL
- Representatives from interested parties such as our associated organizations, Subcontractors etc.

The Impartiality Committee consists of three members from the following categories

- a. one member from AIWTPL,
- b. one member from customer and
- c. one member from external providers.

Although the number of members can increase, the number of external members must always be higher than the number of AIWTPL members. AIWTPL is responsible to provide any information requested by the committee and may invite additional experts on the areas it provides services as guest to the meetings, if required.

The chairman of the Impartiality Committee shall be an external member and is elected by the Impartiality Board for a term of at minimum 1 year. At the opening of each meeting the chairman will be confirmed.

The composition and competencies of the Impartiality Board will be reviewed and recorded as part of the management review meetings.

The position of the Impartiality Committee within the structure of AIWTPL is referenced in a chart of the Company Structure.

6.1.1 Selection and inclusion of a New Board Member

To be a AIWTPL Impartiality Board member, the potential candidate is requested to submit the resume for review. If the resume is considered satisfactory, AIWTPL will invite this person to participate in the next

5|6



Impartiality CommitteeMeeting, initially as a guest. The Impartiality Committee will vote at the start of the meeting about accepting the membership of the new committee member.

Once accepted, the Director – Technical confirms and welcomes the new member to the committee. The member will also be required to sign the Non-Disclosure Agreement and be introduced by this procedure. Records shall be maintained for the duration of the member's involvement with the Board (plus three years).

6.2 Duties and Responsibilities of the Impartiality Board

The role of the Board is to verify that certification activities are performed in an impartial manner without undue influences that might negatively impact the impartiality of services rendered.

The composition, terms of reference, duties, authorities, competence of members and responsibilities of this committee is documented and authorized by the Director – Technical in the form of an appointment letter.

The principle responsibilities of the Impartiality Board include:

- Assistance in developing the policies relating to impartiality of its certification activities;
- ⁻ Counteract any tendency on the part of the Training do not allow commercial or other considerations to prevent the consistent objective provision of certification activities;
- Advicing on matters affecting confidentiality in certification, including openness and public perception, and
- ⁻ Conduct a review, as least twice in a year, of the impartiality of the certification and decision making processes of AIWTPL.
- Risk assessment to be carried out if any candidate or organization who underwent training / consultancy requires certification.

Other tasks or duties may be assigned to the Impartiality Board provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

As a part of its activities, the Impartiality Board will be made aware that if AIWTPL top management does not respect its advice, the Board has the right to take independent action (e.g. informing relevant authorities, stakeholders, shareholders).

In taking independent action, the board shall respect the confidentiality requirements of customers and AIWTPL.

6.3 Impartiality Board Meeting

The board discharges their responsibility by attending and participating in the board meetings which takes place at least once in a year.

During its annual meeting, the Impartiality Board will have access to all the information necessary to enable it to fulfill its functions. The meeting will include review of the impartiality of the certification and decision making processes of AIWTPL.

In case of a deadlock situation, the Chairman of the Impartiality Committee can take the final decision. During the meeting, the Impartiality Board Members will to the best of their ability remain a neutral party who through the use of objective evidence review, determine and make recommendations on the potential risks/threats to impartiality which may impact AIWTPL's process or business practices, These risks/ threats may include but not be limited to self-review threats, financial perspective, review of one's own work, familiarity and intimidation. If either risk/threat is identified, the Impartiality Board Member will make recommendations on how to remove, reduce or prevent the risk entirely to the management of AIWTPL.

The outcome of the meeting will be recorded in the Impartiality Board Meeting Minutes by a AIWTPL representative, distributed to the participants via e-mail and saved in AIWTPL cloud.



7. Documents and Records

SI. No	Document Description	Document No	Department	Retention Period
1	Declaration of AIWT Director - Technical with regard to Impartiality	F/HR/11	HR	Five Years
2	List of risk on threat, Action Plan and opportunities of Improvement	F/TM/04	Top Management	Two Years
3	Impartiality Committee Member Non-Disclosure and Confidentiality Agreement	F/TM/08	Top Management	One Year
4	NDA from employees	F/HR/08	HR	Life of the employee
5	Declaration of impartiality by Examiner	F/HR/12	HR	Two Years
6	Declaration of impartiality and confidentiality by Assessor	F/HR/13	HR	Two years

8. Revision History

SI. No	Rev No	Rev. Date	Reason for Change	Change Authorized by	What are the changes
1	0	25/05/2019	New Issue	Director	New Issue
2	1	22/07/2019	As per the Document assessment	Director	Changed to Balance sheet from financial risk report and responsibility of impartiality committee

9. Standard Reference

SI. no	Standard	Year of Revision	Clause Reference	Description
1	ISO 17024	2012	4.3	Management of impartiality
2	ISO 17024	2012	5.11	Examination
3	ISO 17024	2012	9.4	Decision on certification