

Impartiality Policy

Bulletproof is a GLI company and a registered trade name of GLI Europe B.V. References to Bulletproof, GLI and GLI Europe are interchangeable and have the same meaning.

GENERAL PROVISIONS

GLI declares that it will comply with the requirements of and ensure impartiality within all its Management System certification activities for all the personnel related to the activities.

The confidentiality, objectivity and impartiality of the certification activities by and on behalf of GLI, shall not be affected by the activities of the certified clients.

The scope of this document is to address the requirements laid down in section 5.2 of ISO/IEC 17021-1:2005

IMPARTIALITY

1.1. GLI understands and is fully aware of the importance of management of impartiality in carrying out its certification activities.

GLI staff is fully committed to ensuring that all certification activities are impartial.

All GLI Auditors are not involved in commercial, financial and other pressure (trade administrative, moral) to compromise their impartiality.

It is the policy of GLI to disqualify any representative from the responsibility of performing assessment or audit activity for any company in which the representative has a prior interest. This includes (but is not limited to):

- a) a vested interest in the assigned client,
- b) prior employment by the client in some capacity within the past two years,
- c) prior provision of consulting services to the client within the past two years

Any relationships between GLI or individuals employed by GLI with other organizations or individuals will be declared, reviewed, documented and risk assessed.

1.2. GLI has documented structures, policies and procedures to manage impartiality and to ensure that the certification activities are undertaken impartially, and has top management committed to impartiality in the management certification activities. GLI has no relationship (formal or informal) with any other company or organisation which may result in a conflict of interest arising from its certification activities. GLI does not offer consultancy to any client or potential client, training other than general training courses such as Internal Audit etc. GLI has identified and analysed (risk assessed) all relationships (formal or informal) with other organisations or individuals which may result in a conflict of interest arising from its certification activities. GLI conducts a risk assessment for all overseas offices as a part of its internal audit process. Should the company propose to enter into any relationship with another company or organisation or enter into any new area of business, that relationship or new area of business will be reviewed by GLI to ensure that impartiality can be demonstrated, and the integrity of the Certification process assured. All risks to impartiality are mitigated and reported to management on a bi-annual basis.

1.3. GLI identifies, analyzes and documents all possibilities for conflict of interests that emerge from certification processes including any conflicts that emerge from its relations.

NOTE: An electronic copy of this document is maintained on the GLI Intranet and is considered to be the Master copy. Prior to using this document, all employees are responsible for ensuring that this is the most current revision.

Impartiality Policy

Presence of relations does not necessarily position GLI in a situation of conflict of interests. If some relations create impartiality threats, GLI documents and eliminates or mitigates such threats.

GLI reviews risks to impartiality on ongoing basis. This information resulting from the review of risks to impartiality is presented to the management.

It is necessary to cover all possible conflict of interests' sources that are identified regardless of their origin.

Appropriate interested parties will be identified and consulted with on matters affecting impartiality including openness and public perception. However, this must be balanced with no single interest predominating. GLI seeks feedback with regards to impartiality both passively (complaints, appeals, compliments) and actively (obtained via direct contact with clients – suppliers, regulators and operators, typically accomplished through a survey process, administered internally). The involved stakeholders identified are forwarded GLI's Policy for safeguarding impartiality, along with a request for feedback.

GLI shall use this information as input in identifying threats to impartiality raised by the activities of such personnel or by the organization that employ them.

GLI requires all employees, internal and external, to comply with impartiality policies.

All GLI auditors and where applicable external experts are required to sign the GLI Confidentiality and Impartiality Declaration before each assignment in order to reveal any situation known to them that may present them or GLI with a conflict of interests.

GLI shall not undertake any action that threatens the impartiality and/or are potential conflict of interests.

When certain relations create unacceptable impartiality threat, the certification shall not be conducted.

1.4. GLI shall not certify another certification body for its activities related to management system certification.

To show effective implementation of policy, GLI will not provide and allow the following:

- Certification services against or on behalf of other certification bodies

1.5. GLI shall not provide and allow the following:

- Consultancy services for realization, continuity and sustenance of certification.
- Services for designing, implementing or maintaining a management system.

GLI or its employees shall not participate in decision process of management system issues.

GLI & its employees shall not participate in preparation and procurement of manuals, guides and procedures.

GLI shall not provide specific and detailed advice, instructions or solutions towards the development and implementation of a management system subject to certification.

GLI shall not provide training on design, implementation and maintenance of management systems subject to certification.

GLI may arrange training as part of the Gap Analysis phase, provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information; i.e. the trainer shall not provide client-specific solutions.

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Impartiality Policy

Such information may include:

- explaining the meaning and intention of certification criteria;
- identifying improvement opportunities;
- explaining associated theories, methodologies, techniques or tools;
- sharing non-confidential information on related best practices;
- other management aspects that are not covered by the management system being audited.

1.6 In accordance with ISO/IEC 27006 IS 5.2, GLI may carry out the following activities, not considered as consultancy and not resulting in a conflict of interest:

- a) provision of training courses / lectures, provided that, where these courses relate to information security management, related management systems or auditing, GLI shall confine itself to the provision of generic information and advice which is publicly available (i.e. GLI shall not provide company-specific advice which contravenes point b) below;
- b) making available request information describing GLI's interpretation of the requirements of the certification audit standards;
- c) performing second and third-party audits according to standards or regulations other than those being part of the scope of accreditation;
- d) adding value during certification audits and surveillance visits (e.g. identifying opportunities for improvement, as they become evident during the audit, without recommending specific solutions).
- e) pre-audit activities, solely aimed at determining readiness for certification audit:
such activities shall not:
 - result in the provision of recommendations/ advice,
 - contravene point a) to e),
 - shall not be used to justify a reduction in the eventual certification audit duration;

1.7 GLI shall not provide internal audits for its certified clients. GLI shall not certify a management system for which it has conducted internal audits within two years following the end of the internal audits.

1.8 GLI shall not provide certification services to a client when relations between a consultancy company and GLI could lead to impartiality threat.

1.9 GLI does not outsource audits to management system consultancy organizations. GLI may use individuals contracted as auditors or technical experts.

GLI does not, and has no plans to, subcontract work that falls under ISO 17021 accreditation. Should it become necessary, however, the following procedure shall apply:

- All external auditors and external experts are required to comply with GLI Audit Process and sign the GLI Confidentiality and Impartiality Declaration.

1.10 GLI shall not allow any consultancy organization to market or offer the activities of GLI. GLI shall not state or imply that certification would be simpler, easier, faster or less expensive if a specific consultancy organization were used.

1.11 Personnel (including those acting in a managerial capacity) who have provided consultancy (including internal audits) within two years to the organization seeking certification, are not allowed to take part in audit or other certification activities.

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Impartiality Policy

1.12 GLI identifies, analyzes and documents all possibilities for conflict of interests that emerge from certification processes including any conflicts that emerge from its relations. Presence of relations does not necessarily position GLI in a situation of conflict of interests.

When potential impartiality threat arises GLI eliminates it or decreases it.

It is necessary to cover all possible conflict of interests' sources that are identified regardless of their origin.

1.13 GLI staff is fully committed to ensuring that all certification activities are impartial.

There shall be no pressure of any kind (financial, trade, administrative, moral or other) over GLI and the personnel regarding the execution of their obligations as a Certification Body.

1.14 GLI requires all employees, internal and external, to comply with impartiality policies.

It is the policy of GLI to disqualify any representative from the responsibility of performing assessment or audit activity for any company in which the representative has a prior interest. This includes (but is not limited to):

- a) a vested interest in the assigned client,
- b) prior employment by the client in some capacity within the past two years,
- c) prior provision of consulting services to the client within the past two years.

REVISION HISTORY

All version history, to date, is in hidden text. To view the version history in its entirety, please select Ctrl + Shift + *.

Version	Change description	Date
1.0	Initial release	21-FEB-2020
2.0	Added section 1.6	21-DEC-2020
3.0	Removed reference to the Impartiality Committee.	18-FEB-2021
4.0	Section 1.3, added: Appropriate interested parties will be identified and consulted with on matters affecting impartiality including openness and public perception. However, this must be balanced with no single interest predominating. GLI seeks feedback with regards to impartiality both passively (complaints, appeals, compliments) and actively (obtained via direct contact with clients – suppliers, regulators and operators, typically accomplished through a survey process, administered internally). The involved stakeholders identified are forwarded GLI's Policy for safeguarding impartiality, along with a request for feedback.	1-MAR-2022

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