



Zolabix (Pty) Ltd

No.	PY03
Revision No.	1
Date	18/03/2024

Impartiality Policy Statement

Zolabix (Pty) Ltd is the legal entity responsible for certification activities; reference to Zolabix (Pty) Ltd in this Policy and Public Statement refers to these legal entities.

Zolabix (Pty) Ltd its Directors, Staff and Subcontractors fully understand the importance of impartiality in undertaking its Certification Activities. Zolabix (Pty) Ltd 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.

- Zolabix (Pty) Ltd Certificates are only issued following a review by an independent authorised and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate
- Zolabix (Pty) Ltd does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- Zolabix (Pty) Ltd does not offer (and has never offered) an internal audit service to its certified clients.
- Zolabix (Pty) Ltd does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- Zolabix (Pty) Ltd does not have (and will not form) any relationships with companies who offer consultancy or other services that can be construed as having an impact on the certification services provided by Zolabix (Pty) Ltd Any proposed relationship between Zolabix (Pty) Ltd and any other company will undergo a risk assessment by the Committee for Impartiality prior to that relationship being formalised. Any current relationships with companies, organisations and individuals will be risk assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the certification process.
- Individuals employed by or otherwise contracted to Zolabix (Pty) Ltd 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 Zolabix (Pty) Ltd to be declared. Zolabix (Pty) Ltd will use the information to identify any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest.
- Zolabix (Pty) Ltd will not allocate a member of staff or subcontractor to a management system audit where any past relationship has existed. Exceptionally and at the discretion of the Technical Manager or Directors an individual or subcontractor may be allocated to a management system audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- Zolabix (Pty) Ltd does not and will not offer any commission, ('finders fees or other inducements) to any individual or company in respect of referrals of clients.
- Zolabix (Pty) Ltd does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Zolabix (Pty) Ltd is general in nature and available to all companies or individuals who wish to attend.
- Zolabix (Pty) Ltd will ensure that it is not linked or marketed in any way which links it with the activities of a management system consultancy and will take appropriate action should any such link be identified.

Originator	Approved by	Signature	Page 1 of 4
Quality Manager	Managing Director		



Zolabix (Pty) Ltd

No.	PY03
Revision No.	1
Date	18/03/2024

Impartiality Policy Statement

- Auditors 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 audit.

Zolabix (Pty) Ltd.'s Impartiality Norms:

- No outsourcing of Audits to Consultancy Organisation.
- No Referral Fees to be paid to Consultancy Organisation.
- Facts based communication to Clients/ Consultancy Organisation.
- Adherence to all Accreditation and other Zolabix (Pty) Ltd Policies.
- Zolabix (Pty) Ltd shall not carry out any other conflicting services other than its core business of Certification.
- Zolabix (Pty) Ltd shall not employ any professional conflicting its ethical policies.
- Zolabix (Pty) Ltd shall not allow any of its auditors to market the services and conduct the audits for the same client.
- Zolabix (Pty) Ltd shall not allow any of its auditors to carry out financial transactions with clients / consultants.
- Zolabix (Pty) Ltd shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of Zolabix (Pty) Ltd shall disclose any situation impairing the business ethics.
- Zolabix (Pty) Ltd shall 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.
- Zolabix (Pty) Ltd shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ Zolabix (Pty) Ltd norms.
- Zolabix (Pty) Ltd shall not allow any auditor to conduct the audit for the client for which it has not been approved.
- Zolabix (Pty) Ltd shall maintain transparency with regard to all information.
- No auditor shall divulge any confidential information of the client to any third party without written consent from the client and approval by MD
- No auditor shall carry any client information with them after the usage period. All client information shall be returned after usage.
- Utmost care/verification to be carried out for granting the right scope of certification.
- Any unethical practice observed should be notified to the management at the earliest.
- Zolabix (Pty) Ltd shall not allow any of its auditors to accept any gifts from clients/consultants of value greater than ZAR 500.

Originator	Approved by	Signature	Page 2 of 4
Quality Manager	Managing Director		



Zolabix (Pty) Ltd

No.

PY03

Revision No.


1

Date

18/03/2024

Impartiality Policy Statement

- Zolabix (Pty) Ltd shall not allow any auditor to conduct audit for the organization where any of its 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.
- To supplement in-house resources **Zolabix (Pty) Ltd** employs Associate (subcontract) auditors and sometimes has working relationships with overseas business managers. At no stage does **Zolabix (Pty) Ltd** outsource its audits to management systems consultancy organisation, outsource its certification decisions, or link its marketing activities with management systems consultancy. **Zolabix (Pty) Ltd** retains full control of all decision-making processes regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification.
- **Zolabix (Pty) Ltd** continues to evaluate the risks associated with its operations in the domestic and overseas to ensure it can meet liabilities associated with its certification activities. A comprehensive risk analysis is maintained and reviewed annually.
- Conflict of Interest and objectivity is further covered through annual training sessions and contractually binding agreements, to ensure all management system certification activities are conducted in an independent and impartial manner.
- Audit/certification staff are prohibited from participating in the Audit/certification of any organisation to which they have given assistance, by consultancy or training (other than professionally registered auditor training), or where they have any financial or commercial interest for a minimum period of 2 years prior to the date of application of the organisation for registration.
- When allocated to a particular contract, Audit/certification staff shall not disclose or discuss any detail; before or after the Audit/certification; to any member of staff other than their direct Management or other members of the team, as required by the Confidentiality agreement signed on commencement of employment.
- All subcontracted Audit/certification staff or sector specialists used to support permanent staff of **Zolabix (Pty) Ltd** shall sign a Subcontractor Agreement and a Confidentiality Agreement and shall be included on the Office Potential Conflict Listing.
- **Zolabix (Pty) Ltd** direct employees are prohibited from engaging in consultancy activities, which involve the active design, generation or implementation of a Quality or Environmental Management System.
- All directly employed Management and Staff are required to declare all financial interests or business activities on commencement and during the period of employment.
- **Zolabix (Pty) Ltd** staff or subcontractors shall not suggest or imply to imply that certification would be simpler, easier, or less expensive if consultancy or training services were used. In addition, subcontract staff cannot offer consultancy or training services to **Zolabix (Pty) Ltd's** clients that they have been assigned to audit, during or after the assigned task has been completed.
- Overall, the certification of companies who supply a service to **Zolabix (Pty) Ltd** is not deemed to be an unacceptable threat to conflict of interest, however, they will need to enter into an SLA with Zolabix (Pty) Ltd, which will contain the terms and conditions of the impartiality policy.

Originator	Approved by	Signature	Page 3 of 4
Quality Manager	Managing Director		



Zolabix (Pty) Ltd

No.	PY03
Revision No.	1
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Impartiality Policy Statement

• **Zolabix (Pty) Ltd** recognize that the source of revenue for a certification body is the client paying for certification and that this is a potential threat to impartiality. Therefore **Zolabix (Pty) Ltd** is a self-financed independent organisation, with a number of controls to ensure that impartiality is retained. To obtain and maintain confidence, it is essential that **Zolabix (Pty) Ltd's** certification decisions are based on objective evidence of conformity or nonconformity, and that any decisions made are not influenced by other interests or by other parties. Certification decisions are made and signed for by a competent Quality Manager who was not responsible for the audit and was not a member of the audit team **Zolabix (Pty) Ltd**. In the event the Quality manager was part of the audit team, the MD will make the certification decisions. Zolabix (Pty) Ltd recognizes that threats to impartiality include the following.

- Self-interest threats arising from a person or body acting in their own interest.
- Self-review threats arising from a person reviewing the work that they have conducted themselves.
- Familiarity (or trust) threats arising from a person becoming too familiar with or too trusting of another, instead of seeking audit evidence.
- Intimidation threats arising from a person having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.

Public Statement (as it appears on Zolabix (Pty) Ltd.'s website)

Zolabix (Pty) Ltd, its Directors, Managers, Staff and others involved in the Certification of Organisations fully understand the importance of impartiality in undertaking its Certification Activities.

Zolabix (Pty) Ltd will therefore ensure that in its dealings with clients or potential clients, all employees or other personnel involved in Certification Activities are, and will remain, impartial.

To ensure that impartiality is both maintained and can be demonstrated, Zolabix (Pty) Ltd has identified, and risk-assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.

Originator	Approved by	Signature	Page 4 of 4
Quality Manager	Managing Director	