



ACCURATE GLOBAL
CERTIFICATION L.L.C.

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POLICY FOR IMPARTIALITY & INDEPENDENCE

Accurate Global Certification L.L.C is the legal entity responsible for Pre- Shipment inspection services, ensuring full compliance with applicable GSO standards and the regulations of the exporting countries.

Personnel are restricted from participating in any activity that would place the competence, impartiality and judgment of the AGC (the IB) into question. If a situation arises, all personnel are encouraged (and required) to report it to the Managing Director.

Whether an individual is directly involved or is aware of a situation with another employee or individual, it must be reported to avoid any potential questioning of the Inspection results.

It is important to note that providing impartial results is the key to the organization's success while covering its intended scope like product quality safety standards, labelling compliances, packaging compliances, regulatory requirements of the exporting countries and issuance of certificate of conformity as prudent evidence of conformity. The honesty and integrity of the Inspection Body and its personnel are of the utmost importance. All personnel are required to disclose to the Managing Director any relationships to individuals or organizations that may be considered a conflict of interest with the organization (e.g. consulting with customers, working for competitors and providing personnel information of clients etc.). If an employee is approached by anyone and requested to falsify information or is asked to pay a bribe for results, then this also must be reported immediately. The policy clearly states that the integrity and honesty of the Inspection Body are to be always upheld.

The top management, managers and personnel of AGC (the IB) understand the importance of impartiality and independence in undertaking its inspection activities. AGC (the IB) will therefore ensure that in all its dealings with clients or potential clients, all employees or other personnel are and will remain impartial and that it will not allow commercial, financial or other pressures to compromise our impartiality.

AGC (the IB) recognizes that threats to impartiality might include the following:

- **Self-interest threats** - threats that arise from a person or body acting in its own interest to benefit itself.
- **Self-review threats** - threats arising from a person reviewing the work that they have conducted themselves.
- **Familiarity threats** - threats that arise from a person being familiar with or trusting of another person, e.g. an examiner or inspection body personnel developing a relationship with a candidate that affects the ability to reach an objective judgment
- **Intimidation threats** - threats that prevent the inspection body or its personnel from acting objectively due to fear of a candidate or other interested party.
- **Financial threats** - the source of revenue for inspection body can be a threat to impartiality.

To ensure that impartiality is maintained and can be demonstrated the following principles have been established.

AGC (the IB) Managing Director is committed to ensure impartiality, independence, professional Judgement and operational integrity.



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- All of the personnel of AGC (the IB) (both internal and external) who could influence the Inspection activities always ensure impartially while judgement based upon the inspected products.
- AGC (the IB) identifies all risks to its impartiality on an ongoing basis through past records of their personnel e.g. their experience letters etc., including those risks that arise from its Inspection activities, from its relationships to any company, or from the relationships of its personnel with the clients. Any proposed risks associated with will undergo a risk assessment by the Management prior to that relationship being formalized.
- AGC (the IB) does not have (and will not form) any relationships with clients or any company that can be construed as having an impact on the Inspection services provided by the IB. Any proposed relationship between AGC (the IB) and any other company will undergo a risk assessment prior to that relationship being formalized.
- Any current relationships with companies, organizations and individuals will be assessed for the risks on regular basis to ensure that the relationship does not impact upon the impartiality of the Inspection process. The risk assessment will be reviewed by the Management.
- Individuals employed by or otherwise contracted to AGC (the IB) are required to document and record their current and past relationships with all companies. Any situation past or present which associates to potential conflict of interest is declared by the IB. AGC (the IB) 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.
- AGC (the IB) shall conduct Inspection activities using permanent employees or after undertaking due diligence check on temporary staffs(outsourced), if situation demands.
- AGC (the IB) ensures that activities of separate legal entities, with which the Inspection organisation or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its Inspection activities.
- AGC (the IB) does not market or offer its activities as linked with the activities of an organization that provides consultancy. AGC (the IB) does not state or imply that Inspection would be simpler, easier, faster or less expensive if a specified consultancy organization were used and will take appropriate legal action should any such link be identified.
- AGC (the IB) may take appropriate legal action to respond to any risks to its impartiality, arising from the actions of other persons, bodies or organizations, of which it becomes aware.
- All employees will be reviewed at least annually to ensure that they remain impartial, independent, professional judgmental and having when conducting inspection and related activities.
- AGC (the IB) understand the impact and possible influence that can be exerted on the organization or on our personnel when conducting Inspection at client's location.
- Every person of AGC (the IB) is required to disclose known relationships with the audited organizations in order for AGC (the IB) to manage the possible impartiality or conflict of interest. In order to remain impartial AGC (the IB) always strive to:
 - Constantly educate and make all personnel aware of all possible threats of conflict of interest that can arise during certification process.

AGC-MGT-POL-02



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- Ensure that all management and personnel are aware of the confidentiality agreements and other related documents (conflict of interest agreement, confidentiality agreement).
- Continuously monitor and identify possible threats to our impartiality and guard against such threats.
- Empower management to take immediate actions against any person or client who act in a way that undermines AGC (the IB) position on impartiality.
- Demand that all personnel declare any relationship that they may have which can result in breaching the conduct on impartiality and or confidentiality with clients
- Constantly provide personnel with necessary support in reporting and co- operating with authorities when reporting incident(s) which are threats to impartiality.
- AGC (the IB), shall maintain all records of investigation of incidents as and objective evidence and a documented information for records.

AGC (the IB) shall identify threats to its impartiality on an ongoing basis through a Risk register. This shall include those threats that arise from its activities, from its related bodies, from its relationships, or from the relationships of its personnel. AGC (the IB) conducts an annual risk assessment on impartiality and conflict of interest and is responsible for ensuring that threats to impartiality and conflict of interest are reviewed regularly. Conflict of interest and objectivity is addressed further through binding agreements to ensure that all activities undertaken throughout the inspection process are conducted in an independent and impartial manner.

Each Inspector / personnel who are part of Inspection Activities, or be a part of the Inspection Project, shall sign a Declaration, and before he undertakes the activity.

(Signed)

Managing Director