

Appendix 12 Impartiality Policy

Assured Origin Ltd. (AO) t/a Print and Media Certification (PMC) understands and is committed to impartiality and objectivity in carrying out audit and certification activities and manages conflict of interest or threats to impartiality.

If AO Impartiality Team consisting of John Dick (director), Jon Stack (colour/certification manager), [Graham Arundell, \(advisers, defined as impartiality support team members, acting as individual experts\)](#) identify an unacceptable threat to impartiality then assessment and certification services are not given.

AO has never and does not offer or provide:

- Management system consultancy or other consultancy to its certified clients
- Company specific training or any training which is not confined to publicly available information
- Any information describing AO's interpretation of requirements of the standards
- Any audit activities with clients prior to initial audit, other than to determine readiness for certification
- Identification of areas for potential improvement which recommend specific solutions
- Internal audits of certified clients or internal information security reviews or audits of clients

AO does not certify:

- Another certification body for whatever purpose
- Where the client has received management system consultancy, internal audits, or colour management consultancy where the relationship between the consultancy organisation and AO poses an unmanageable threat to impartiality

The management structure is such that the personnel making the certification decision are different to those that performed the audits. The AO IMS prevents allocation of an audit team member where there is a known/declared relationship that constitutes an unacceptable or unmanageable threat to impartiality.

AO does not outsource audits to any management system consultancy organisation but may outsource to individuals contracted as auditors.

AO's audit and certification services are not marketed or offered as linked with the activities of any organisation or individual that provides management system consultancy. AO will act to correct inappropriate claims by any consultancy organisation or individuals stating or implying that certification would be simpler, easier, faster or less expensive if AO's services were used. AO does not state or imply that certification would be simpler, easier, faster or less expensive if a client or potential client employed a particular consultancy organisation or individual.

Any individual who has provided (within two years to a client or potential client) management system or colour management consultancy (or acted in a managerial capacity) are not used by AO in any audit or certification activities of that client.

All AO personnel, whether internal, external or the Impartiality Team members, who could influence the certification, are required to act impartially and not allow commercial, financial or other factors

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to undermine AO impartiality. AO will take appropriate action to respond to any threats to its impartiality originating from the actions of other persons, bodies or organisations.

AO requires all personnel whether internal, external or the Impartiality Team, Impartiality Support Team members, to disclose any circumstance that may present them or AO with a conflict of interest. This statement is publicly available to any interested party.

All AO staff, shareholders, directors, contractors, associates, impartiality team members, impartiality support members are required to sign the Undertaking of confidentiality. This document provides more detailed arrangements.

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