

CONFIDENTIALITY AND IMPARTIALITY POLICY

All information received by or available to Verger staff, sub-contractors or committee members (in whatever format) received in conducting evaluation activities, or during other certification activities, or during any dealings with an organization for any other reason shall be regarded as strictly confidential and shall not be divulged to any 3rd party (unless specified in ISO/IEC 17065:2012) without the express permission of the organization or individual concerned. The requirement to keep confidential any information will also include any organization that has a legitimate right to audit or evaluate Verger.

Where Verger is required by law to release confidential information to a third party the client or individual concerned shall, unless regulated by law, be notified in advance of the information provided.

However, where the organization is seen to be operating contrary to law requirements or has operating practices which pose a danger to staff, customers or the environment Verger reserves the right to immediately report any such incident to the relevant authority. Any such reporting will only be undertaken with the permission of top management.

All records, at Verger, will be retained in a secure manner, only accessible to authorized staff via either paper records or password controlled electronic records. Sub-contractors will be limited to accessing information produced by them in conducting an evaluation. Records will only be made available to organizations who can demonstrate a legitimate (and legal) right to view those records and specifically to Accreditation Bodies.

All staff, Subcontractors, CEOs and Committee Members will be required to agree to Verger confidentiality policy and sign a confidentiality agreement. Sub-contractors will also sign an agreement which also contains the responsibility to maintain confidentiality.

Verger is the legal entity responsible for certification activities; reference to Verger in this Policy and Public Statement refers to these legal entities.

Verger its managers, Staff and Sub-contractors fully understands the importance of impartiality in undertaking its Certification Activities. Verger 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 principals have been established.

- ❖ Verger Certificates are only issued following a review by an independent authorized and competent member of the management team (who has not been involved in the evaluation) to ensure that no interest shall predominate
- ❖ Verger does not offer (and has never offered) consultancy or any other form of consultancy to companies or individuals.
- ❖ Verger does not offer (and has never offered) an internal audit service to its certified clients.
- ❖ Verger does not own or have any interest (financial or otherwise) in any other company that offers certification or related consultancy services.
- ❖ Verger 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 company any proposed relationship between company and any other company will undergo a risk assessment by the Committee for Impartiality prior to that relationship being formalized. Any current relationships with companies, organizations and

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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 Verger 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 Verger to be declared. Verger 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.
- ❖ Verger will not allocate a member of staff or sub-contractor to an evaluation where any past relationship has existed. Exceptionally and at the discretion of the Technical Manager or Directors an individual or sub-contractor may be allocated to an evaluation where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- ❖ Verger does not and will not offer any commission, ('finders fees' or other inducements) to any individual or company in respect of referrals of clients unless:
 - a. The terms and conditions of any such referral are clearly established and can be demonstrated and it can also be demonstrated that the fee is for a referral and the fact that a commission has been paid will in no way effect the outcome of an audit.
 - b. A risk assessment (to establish the potential for an unacceptable threat to impartiality) has been carried out on the process through which any such payment is made to an individual or organization (normally a consultant) requesting the commission for referrals.
 - c. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- ❖ Verger does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Company is general in nature and available to all companies or individuals who wish to attend.
- ❖ Verger 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.
- ❖ Evaluators 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.

Verger's Impartiality Norms:

- ❖ No outsourcing of Evaluators to Consultancy Organization.
- ❖ No referral Fees to be paid to Consultancy Organization.
- ❖ Facts based communication to Clients/ Consultancy Organization.
- ❖ Adherence to all Accreditation and other Company Policies.
- ❖ Verger shall not carry out any other conflicting services other than its core business of Certification.
- ❖ Verger shall not employ any professional conflicting its ethical policies.
- ❖ Verger shall not allow any of its Evaluators to market the services and conduct the internal audits or other evaluations for the same client.
- ❖ Verger shall not allow any of its Evaluators to carry out financial transactions with clients/ consultants.

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- ❖ Verger shall not carry out business with any consultant inducing pressures to compromise impartiality.
- ❖ All employees of Company shall disclose any situation impairing the business ethics.
- ❖ Verger shall not allow any of the Evaluators to carry out audits for the client at least for 2 years from the date of relinquishment from their services for the client.
- ❖ Verger shall not allow any Evaluator to compromise on the evaluation timing as required as per the accreditation/ Verger norms.
Verger shall not allow any Evaluators to conduct the audit for the client for which it has not been approved for.
- ❖ Verger shall maintain transparency with regard to all information.
- ❖ No Evaluators shall divulge any confidential information of the client to any third party without written consent from the client and approval by Decision Maker of Halal Certification Department.
- ❖ No Evaluators 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.
Verger shall not allow any of its evaluators to accept any gifts from client / consultant.
Verger shall not allow any evaluators 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 resource Verger employs Associate (sub-contract) evaluators and sometimes has working relationships with overseas business managers. At no stage does Verger outsource its audits to consultancy organization, outsource its certification decisions, or link its marketing activities with consultancy. Verger retains full control of all decision-making processes regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification.
- ❖ Verger 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 Verger is a self-financed independent organization, with a number of controls to ensure that impartiality is retained. To obtain and maintain confidence, it is essential that Verger'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 Scheme Manager who was not responsible for the evaluation and was not a member of the evaluation team Verger 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.

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- ❖ Verger, its Top management, Managers, Staff and others involved in the Certification of product fully understand the importance of impartiality in undertaking its Certification Activities.
- ❖ Company 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, Verger has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.

