

Impartiality Policy – Qualitek Inspection Department

Qualitek Labs Private Limited is the legal entity responsible for inspection activities; reference to **Qualitek Labs Private Limited** in this Policy and Public Statement refers to this legal entity.

Qualitek Labs Private Limited – Inspection Department is a department in the above legal entity responsible for inspection activities. **Qualitek Labs Private Limited**, its Top Management, Staff and Subcontractors fully understand the importance of impartiality in undertaking its Inspection activities. **Qualitek Labs Private Limited** will therefore ensure that, in all its dealings with clients / applicants / candidates / certified persons 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.

- Inspection report is issued only after approval of authorized person, to ensure that no interest shall predominate.
- Certificate to the certified person is issued only after approval of authorized person, to ensure that no interest shall predominate.
- **Qualitek Labs Private Limited** does not have (and will not form) any relationships with companies who manufactures the product under inspection or testing or provides other services that can be construed as having an impact on the inspection activities provided by **Qualitek Labs Private Limited**. Any proposed relationship between **Qualitek Labs Private Limited** and any other company will undergo a risk assessment by the Top Management for Impartiality prior to that relationship being formalized. Any current relationships with companies, organizations and individuals will be assessed on a regular basis to ensure that the relationship does not impact upon the impartiality of the inspection and certification activities.
- Individuals employed by or otherwise contracted to **Qualitek Labs Private Limited** are required to document and record their current and past relationships with all manufacturers / testing laboratories / others, where there are chances of conflict of interest considering the nature of activities. Any situation past or present, which may present a potential conflict of interest, is required by **Qualitek Labs Private Limited** to be declared. **Qualitek Labs Private Limited** 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.
- **Qualitek Labs Private Limited** does not and will not offer any commission, ('finders fees' or other inducements) to any individual or company in respect of referrals of clients / applicants / candidates / certified persons unless:
 1. The terms and conditions of any such referral are clearly established and demonstrated. It can also be demonstrated that the fee is for a referral and the fact that a commission that has been paid will in no way affect the outcome of inspection and certification activities.
 2. 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.
 3. All such payments are documented, recorded, and traceable and accompanied by a purchase order and invoice.
- Inspection personnel and others involved in the inspection 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 inspection and certification activities.

Qualitek Labs Private Limited Impartiality Norms:

- **Qualitek Labs Private Limited** shall not recruit any person, whose relative are working at permanent client's place.

- **Qualitek Labs Private Limited** shall adhere to all accreditation and other **Qualitek Labs Private Limited** policies.
- **Qualitek Labs Private Limited** shall not employ any professional conflicting its ethical policies.
- **Qualitek Labs Private Limited** shall not allow any of its inspection personnel to market the services offered by organization.
- **Qualitek Labs Private Limited** shall not allow any of its inspectors and examiners to carry out financial transactions with clients / applicants / candidates / certified persons / subcontractors.
- All employees of **Qualitek Labs Private Limited** shall disclose any situation impairing the business ethics.
- **Qualitek Labs Private Limited** will allocate the inspection work to its inspection personnel considering the defined time period of Inspection. No over work / load will be given, which can cause chances of compromising the inspection activities.
- Any unethical practice observed should be notified to the management at the earliest.
- **Qualitek Labs Private Limited** shall not allow any of its personnel to accept any gifts from client / subcontractor / applicant / candidate / certified person.
- **Qualitek Labs Private Limited** shall not allow any inspection personnel to conduct inspection for the organization where any of its family members / close relatives are involved at a decision making position.
- **Qualitek Labs Private Limited** employees are prohibited from engaging in activities, which involve the design / manufacture / supply / installation / servicing / maintenance of product under inspection and certification.
- **Qualitek Labs Private Limited** recognizes that the source of revenue is the client / applicant / candidate / certified person paying for inspection activities, and that this is a potential threat to impartiality. Therefore, **Qualitek Labs Private Limited** 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 **Qualitek Labs Private Limited** inspection 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. Decision on inspection of product as well as decision on granting of certificate are made and signed for by an Authorized person, who was not responsible for such activities, where there are chances of potential conflict of interest. **Qualitek Labs Private Limited** recognizes that threats to impartiality include the following:
 - Self-interest threats arising from a person 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.

Public Statement (as incorporated in **Qualitek Labs Private Limited quotations)**

Qualitek Labs Private Limited, its Top Management, Manager QMS and Inspection, Staff and others involved in the inspection and activities of organization fully understand the importance of impartiality in undertaking its inspection activities.

Qualitek Labs Private Limited will therefore ensure that in its dealings with clients / applicants / candidates / certified persons or potential clients, all employees or other personnel involved in inspection activities are, and will remain, impartial.

To ensure that impartiality is both maintained and can be demonstrated, **Qualitek Labs Private Limited** has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.