

Appendix D: Impartiality Policy

AXC is committed to providing impartial, objective, and consistent management system certification services in accordance with the requirements of ISO/IEC 17021-1:2015, and relevant scheme-specific standards. The integrity and credibility of our certification activities are paramount to maintaining the confidence of our clients, stakeholders, and the wider public. Top management AXC fully understands the importance of impartiality in carrying out our management system certification activities. We are unequivocally committed to:

- **Safeguarding Impartiality:** Ensuring that all certification activities are conducted free from any commercial, financial, or other pressures that could compromise our impartiality.
- **Managing Conflicts of Interest:** Proactively identifying, analyzing, evaluating, treating, monitoring, and documenting all risks related to conflicts of interest that may arise from our activities, our relationships, or the relationships of our personnel.
- **Ensuring Objectivity:** Maintaining the highest level of objectivity in all our management system certification decisions and processes.

To uphold our commitment, AXC adheres to the following principles:

- a) Our certification services are available to all applicants who meet the requirements of the applicable standards, without undue financial or other limiting conditions (e.g., membership of an association, geographical location). Policies and procedures are applied in a non-discriminatory manner.
- b) AXC does not offer or provide management system consultancy or internal auditing services to its clients. We do not have links with organizations providing consultancy to our clients, nor do we promote the services of such organizations.
- c) We will not certify another certification body for its management system certification activities.
- d) All personnel, whether internal or external, involved in certification activities (including auditors, technical experts, and committee members) are required to act impartially and declare any potential or actual conflicts of interest. Personnel with conflicts of interest related to consultancy activities will not be used in certification processes for a minimum of two years following the end of the consultancy.
- e) Certification decisions are made by competent persons who are independent of the auditing process and free from any undue influence or pressure.
- f) We are transparent about our audit processes, and the processes for granting, refusing, maintaining, renewing, suspending, restoring, or withdrawing certification.
- g) All confidential information obtained during certification activities is strictly protected and not disclosed to third parties without prior written consent, unless required by law or contractual arrangements (e.g., with an accreditation body).
- h) We maintain a robust process for the ongoing identification and assessment of threats to impartiality. This includes:
 - i. Identifying potential sources of threats (e.g., ownership, governance, management, personnel, shared resources, finances, contracts, marketing, payment of sales commission, prior relationships with clients).
 - ii. Consulting with appropriate interested parties to advise on matters affecting impartiality, including openness and public perception. This consultation is balanced to ensure no single interest predominates.
 - iii. Implementing measures to eliminate or mitigate identified threats.
 - iv. Regularly reviewing the effectiveness of these measures and documenting any residual risks.

Top Management is ultimately responsible for ensuring the implementation and effectiveness of this Impartiality Policy and providing the necessary resources. Top management conducts an annual review of impartiality risks. All Personnel (Internal & External): Are responsible for understanding and adhering to this

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MANUAL MANAGEMENT SYSTEM FOR AXCSB

Reference: AXCM-01



policy, identifying and declaring any potential conflicts of interest, and acting impartially in all certification activities. AXC has established an Impartiality Committee to advise on matters affecting impartiality and to monitor the implementation of this policy.

AXC also has established clear and non-discriminatory procedures for handling any concerns or complaints related to our impartiality or objectivity. All complaints are investigated thoroughly and acted upon appropriately, with the outcome communicated to the complainant.

We are committed to the continual improvement of our management system, including our processes for safeguarding impartiality, through regular internal audits, management reviews, and monitoring of feedback from clients and other stakeholders.

This Impartiality Policy Statement is publicly available and communicated to all personnel and relevant interested parties.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

MOHD NOR HASSAN BIN KAMAL
DIRECTOR
01.08.2025