


 PAQUETTE & ASSOCIATES	No.	PY03
	Revision No.	00
	Date	June 1, 2024
Impartiality Policy Statement		

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

Paquette & Associates, its Directors, Staff and Subcontractors fully understands the importance of impartiality in undertaking its Certification Activities. Paquette & Associates 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.

- Paquette & Associates' Certificates are only issued following a review by an independent authorised and competent member of the management team (who has not been involved in the audit) to ensure that no interest shall predominate.
- Paquette & Associates does not offer management system consultancy or any other form of consultancy to companies or individuals.
- Paquette & Associates does not offer an internal audit service to its certified clients.
- Paquette & Associates does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- Paquette & Associates 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 Paquette & Associates. Any proposed relationship between Paquette & Associates and any other company will undergo a risk assessment by the Committee for Impartiality prior to that relationship being formalised. Any current relationships with companies, organisations and 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 Paquette & Associates 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 Paquette & Associates to be declared. Paquette & Associates 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.
- Paquette & Associates will not allocate a member of staff or subcontractor to a management system audit 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 a management system audit where a past relationship has existed but there has been no relationship for a minimum of 2 years.
- Paquette & Associates 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:
 1. 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.
 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 organisation (normally a consultant) requesting the commission for referrals.
 3. All such payments are documented, recorded, and traceable and accompanied by an invoice.
- Paquette & Associates does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Paquette & Associates is general in nature and available to all companies or individuals who wish to attend.


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- Paquette & Associates 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.
- Auditors 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.


Paquette & Associates Impartiality Norms:

- No outsourcing of Audits 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 Paquette & Associates Policies.
- Paquette & Associates shall not carry out any other conflicting services other than its core business of Certification.
- Paquette & Associates shall not employ any professional conflicting its ethical policies.
- Paquette & Associates shall not allow any of its auditors to market the services and conduct the audits for the same client.
- Paquette & Associates shall not allow any of its auditors to carry out financial transactions with clients / consultants.
- Paquette & Associates shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of Paquette & Associates shall disclose any situation impairing the business ethics.
- Paquette & Associates shall not allow any of the auditors to carry out audits for the client for at least 2 years from the date of relinquishment from their services for the client.
- Paquette & Associates shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ Paquette & Associates norms.
- Paquette & Associates shall not allow any auditor to conduct the audit for the client for which it has not been approved for.
- Paquette & Associates shall maintain transparency regarding all information.
- No auditor shall divulge any confidential information of the client to any third party without written consent from the client and approval by the President & CEO.
- No auditor 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.
- Paquette & Associates shall not allow any of its auditors to accept any gifts from clients / consultant.

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- Paquette & Associates shall not allow any auditor to conduct an 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 resources Paquette & Associates employs Associate (subcontract) auditors and sometimes has working relationships with overseas business managers. At no stage does Paquette & Associates outsource its audits to management systems consultancy organization, outsource its certification decisions, or link its marketing activities with management systems consultancy. Paquette & Associates retains full control of all decision-making processes regarding granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification.
- Paquette & Associates continues to evaluate the risks associated with its operations domestically and internationally to ensure it can meet liabilities associated with its certification activities. A comprehensive risk analysis is maintained and reviewed annually.
- Conflict of Interest and objectivity is further covered through annual training sessions and contractually binding agreements, to ensure all management system certification activities are conducted in an independent and impartial manner.
- Audit / certification staff are prohibited from participating in the Audit / certification of any organization to which they have given assistance, by consultancy or training (other than professionally registered auditor training), or where they have any financial or commercial interest for a minimum period of 2 years prior to the date of application of the organization for registration.
- When allocated to a particular contract, Audit / certification staff shall not disclose or discuss any detail; before or after the Audit / certification; to any member of staff other than their direct Management or other members of the team, as required by the Secrecy & Non-Disclosure agreement signed on commencement of employment.
- All subcontracted Audit / certification staff or sector specialists used to support permanent staff of Paquette & Associates shall sign a Subcontractor Agreement and a Secrecy & Non-Disclosure Agreement and shall be included on the Office Potential Conflict Listing.
- Paquette & Associates' direct employees are prohibited from engaging in consultancy activities, which involve the active design, generation or implementation of a Quality, Environmental or Health & Safety Management System.
- All directly employed Management and Staff are required to declare all financial interests or business activities on commencement and during the period of employment.
- Paquette & Associates staff or subcontractors shall not suggest or imply to imply that certification would be simpler, easier or less expensive if consultancy or training services were used. In addition, subcontract staff cannot offer consultancy or training services to Paquette & Associates' clients that they have been assigned to audit, during or after the assigned task has been completed.
- Overall, the certification of companies who supply a service to Paquette & Associates is not deemed to be an unacceptable threat to conflict of interest. However, certification of a company in partnership with whom Paquette & Associates provides a direct service is deemed to be an unacceptable **Impartiality Policy**.

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- Paquette & Associates 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 Paquette & Associates is a self-financed independent organization, with several controls to ensure that impartiality is retained. To obtain and maintain confidence, it is essential that Paquette & Associates 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 Certification Manager who was not responsible for the audit and was not a member of the audit team. Paquette & Associates 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 the President & CEO.

Public Statement (as it appears on Paquette & Associates website)

Paquette & Associates, its Directors, Managers, Staff and others involved in the Certification of Organizations fully understand the importance of impartiality in undertaking its Certification Activities.

Paquette & Associates 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, Paquette & Associates has identified, and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.

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