

1.0 Purpose 目的

To eliminate or minimize the threats to the impartiality of system certification and auditing activity through taking corrective and preventive actions to conflicts of interests based on the identification and analysis of the possibilities of various potential threats of conflicts.

在基于识别和分析各种潜在的利益冲突的可能性上，采取纠正和预防措施来消除和减少认证和审核体系的不公平性的危险。

2.0 Scope 范围

All the system certification and audit activities of CSR Solutions Limited (hereinafter called “**CSRS**”) shall be covered by this procedure.

适用于 CSR Solutions Limited (以下简称“CSRS”)的所有体系认证和审核活动。

3.0 Openness 公开性

- 3.1 **CSRS** needs to provide public access to, or disclosure of, appropriate and timely information about its audit process and certification process, and about the certification status (i.e. the granting, extending, maintaining, renewing, suspending, reducing the scope of, or withdrawing of certification) of any organization, in order to gain confidence in the integrity and credibility of certification.

Openness is a principle of access to, or disclosure of, appropriate information.

CSRS需要提供公共访问或披露关于其审核过程和认证过程及任何组织认证地位的适当和及时的信息(如颁发、扩展、保持、更新、暂停、减少或撤销证书)，这些都是为了赢得认证廉洁和诚信的信任度。公开性是了解或披露适当信息的一个原则。

- 3.2 To gain or maintain confidence in certification, **CSRS** should provide appropriate access to, or disclosure of, non-confidential information about the conclusions of specific audits (e.g. audits in response to complaints) to specific interested parties.

要得到认证方面的信任，CSRS应该提供机会或公开关于特定审核结论的非机密性的信息给利益相关方(如：针对投诉的回复)。

- 3.3 **CSRS** should provide appropriate access to interested stakeholders of this Procedure of Impartiality Control, via **CSRS**'s website at www.csr-solutions.org.

CSRS应该为利益相关方提供获得本《审核公正性管理程序》的渠道，如通过CSRS公司网站进行披露。

4.0 Statement 声明

CSRS has fully understood that the impartiality is crucial to the confidence of the system certification. **CSRS** will conduct the identification and analysis of potential threats to the impartiality and take corrective and preventive actions to manage the impartiality, to ensure the confidence and integrity of the system certification activities.

CSRS 充分理解公正性在实施管理体系认证活动中的重要性。CSRS 对影响公正性的利益冲突进行识别、分析和处理，确保管理体系认证活动的客观性和公正性。

5.0 Procedure 程序

5.1 CSRS has recognized that being impartial and being perceived to be impartial is necessary for a certification body to deliver certifications that provides confidence.
CSRS 认识到作为一个认证机构去发放证书来提高信任度和公正性是必不可少的。

5.2 CSRS will consider that the source of revenue is client paying for certification, and that this is a potential threat to impartiality.
CSRS 将会考虑到来自客户支付的认证费用是公正性的一个潜在风险。

5.3 To obtain and maintain confidence, it is essential that CSRS's decisions be based on objective evidence of conformity (or nonconformity) obtained by CSRS, and that its decisions are not influenced by other interests or by other parties.
为了确保获得和保持信任度, CSRS 所做出的任何决定都是基于由 CSRS 获得的一致性(或不一致性)客观证据是至关重要的, 并且该决定不受其他利益相关方或组织影响的。

5.4 Threats to impartiality of the system certification include the following:
体系认证公正性的潜在风险包括以下方面:

- a) **Self-interest threats:** threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.
自我利益的风险: 风险是来自于个人或机构他们自己的利益。涉及到证书的, 是金融利益, 这正是公正性的一个风险。
- b) **Self-review threats:** threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat.
自我评估的风险: 来自于个人或机构他们自己评估自己的工作时的风险。审核客户的管理体系时, 他的认证机构提供一个管理体系的顾问将会是一个自我评估的风险。
- c) **Familiarity (or trust) threats:** threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.
熟悉(或信任)的风险: 风险来自于一个相当熟悉或信任的个人及机构而不是寻求审核证据。
- d) **Intimidation threats:** threats that arise from a person or body having a perception of being coerced openly or secretly, such as a threat to be replaced or reported to a supervisor.
威胁的风险: 来自于个人或组织有知觉性的被强迫公开或匿名的风险, 比如由监督者替代或报告。

5.5 Management of impartiality 公正性管理

5.5.1 CSRS shall have top management commitment to impartiality in management system certification activities. CSRS shall have a publicly accessible statement that it understands the importance of impartiality in carrying out its management system certification activities, and manages conflict of interest and ensures the objectivity of its management system certification activities.
CSRS 应该有最高管理层的承诺书来声明公证的执行管理体系认证。CSRS 应当有公开声明, 要理解在执行管理体系认证中公正性的重要性, 并处理利益的冲突, 确保其管理体系认证活动中的客观性。

- 5.5.2 **CSRS** shall identify, analyze and document the possibilities for conflict of interests arising from provision of certification including any conflicts arising from its relationships on a regular basis, at least once a year. If any relationship creates a threat to impartiality, **CSRS** shall document and be able to demonstrate how it eliminates or minimizes such threats. The demonstration shall cover all potential sources of conflict of interests that are identified, whether they arise from within **CSRS** or from the activities of other persons, bodies or organizations.
CSRS应该识别、分析和记录来自认证条款中利益冲突的可能性，包括任何来自其定期关系的冲突，至少一年一次。如果任何的关系给公正性带来了风险，CSRS将记录并且能够证明如何消除或减少这样的风险。这个证明应该包含所有被识别的利益冲突的潜在来源，不管风险是来源于CSRS或其他个人、机构及组织的活动。
- 5.5.3 A relationship that threatens the impartiality of **CSRS** can be based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients, etc. Examples are as the stockholders of **CSRS**, Consulting Company, other Certification Bodies, Local Government Organizations, Local NGOs, Personnel of **CSRS** including management staff and auditors, clients, certified facilities, and marketing.
威胁到CSRS公正性的关系是基于所有权、治理、管理、个人、资源共享、财务、合同、市场和佣金的支付、或者是推荐新客户等。比如，作为股东的CSRS、顾问公司、其他认证机构、当地政府组织当地非政府组织、CSRS的个人包括管理人员和审核员、客户、被认证工厂和市场。
- 5.5.4 When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of **CSRS** requesting certification from its parent), then certification shall not be provided. 当威胁到公正性关系的时候(如CSRS子公司的所有权者要求向它的总公司提供证书), 那么这个证书将不会被提供的。
- 5.5.5 **CSRS** shall not certify another certification body for its management system certification activities.
CSRS不得承认对其管理体系执行认证活动的另一个认证机构。
- 5.5.6 **CSRS** and any part of the same legal entity shall not offer or provide management system consultancy.
CSRS和任何类似法定实体将不得提供管理体系的咨询。
- 5.5.7 When using individual external auditors and external technical experts, **CSRS** shall require external auditors and external technical experts to have a written agreement by which they commit themselves to comply with applicable policies and procedures as defined by the certification body. The agreement shall address aspects relating to confidentiality and to independence from commercial and other interests, and shall require the external auditors and external technical experts to notify the certification body of any existing or prior association with any organization they may be assigned to audit.
当使用个人内审员和内部技术专家时，CSRS将会要求内审员和内部技术专家写一份书面的协力，要他们自觉遵守由认证机构规定的适当的政策和程序。这个协议应该是要注明有关机密性，商业的独立性和其他利益的一些方面，并且要求内审员和内部技术专家告知任何目前的认证机构或与组织的优先协会都将被审核。
- 5.5.8 When outsourcing is used, **CSRS** shall have a process in which it describes the conditions under which outsourcing (which is subcontracting to another organization to provide part of the certification activities on behalf of the certification body) may take place. **CSRS** shall have

a legally enforceable agreement covering the arrangements, including confidentiality and conflict of interests, with each body that provides outsourced services. But, decisions for granting, maintaining, renewing, extending, reducing, suspending or withdrawing certification shall never be outsourced.

当有使用外包时，CSRS应建立一个程序来描述这种外包(代表人认证机构外包给另一个组织来提供认证活动的一部分)的活动及控制。CSRS应签署一个具有法律效应的协议以覆盖审核安排，包括机密性和利益的冲突，以及每个提供外包服务的机构。但是颁发、保留、更新、扩展、减少、暂停或取消证书的决定不得外包。

5.6 Impartiality Safeguard Committee (Governing Board) 公正委员会

5.6.1 CSRS has established the CSRS-GB (Governing Board) to safeguard the impartiality. CSRS 已经建立了 CSRS-GB(公正委员会)来维护公正。

5.6.2 The structure of CSRS shall safeguard the impartiality of the activities of CSRS and shall provide for a Governing Board to

CSRS 的组织架构应该维护 CSRS 活动的公正性并为公正委员会提供:

- a) assist in developing the policies relating to impartiality of its certification activities,

协助发展有关认证活动公正性的政策。

- b) counteract any tendency on the part of CSRS to allow commercial or other considerations to prevent the consistent objective provision of certification activities,

消除认证活活动中CSRS允许商业或其他想法来阻止一致目标的倾向。

- c) advise on matters affecting confidence in certification, including openness and public perception, and

提供增强认证可信性的建议，包括公开性和公众的认知性。

- d) conduct a review, at least once annually, of the impartiality of the audit, certification and decision-making processes of CSRS.

至少一年一次，组织评审CSRS在审核、认证和决策过程的公正性。

5.6.3 Other tasks or duties may be assigned to the Governing Board provided these additional tasks or duties do not compromise its essential role of ensuring impartiality.

其他被派给公正委员会的任务和职责，为这些额外的任务和职责不妥协其重要的角色并确保了公正性。

5.6.4 The composition, terms of reference, duties, authorities, competence of members and responsibilities of this Governing Board shall be formally documented and authorized by the top management of CSRS to ensure

公正委员会的架构、职权范围、职责、授权、成员的胜任都应该被 CSRS 的高层管理者正式记录和授权来确保:

- a) representation of a balance of interests such that no single interest predominates (internal or external personnel of CSRS are considered to be a single interest, and shall not predominate),

平衡利益的代表，这样就没有单一利益的主导(CSRs个人内部或外部都被认为是一个单一的利益，但不是主导的)

- b) access to all the information necessary to enable it to fulfill its functions, and
访问所有的必要的信息来实现其功能
- c) that if the top management of **CSRS** does not respect the advice of this Governing Board, the Governing Board shall have the right to take independent action (e.g. informing authorities, accreditation bodies, stakeholders). In taking independent action, the Governing Board shall respect the confidentiality requirements relating to the client and **CSRS**.

如果CSRS的高层管理者不同意公正委员会的意见，那么公正委员会有权力采取独立的行动(如：通知执法机构、认可机构、利益相关者)。在采取单独行动的时候，公正委员会应该遵守客户和CSRS关于保密性的要求。

5.6.5 Although this Governing Board cannot represent every interest, **CSRS** should identify and invite key interests. Such interests may include: clients of the certification body, customers of organizations whose management systems are certified, representatives of industry trade associations, representatives of governmental regulatory bodies or other governmental services, or representatives of non-governmental organizations, including consumer organizations.

即使公正委员会不能代表每个利益方，但是 **CSRS** 应该识别和邀请主要的利益方。主要利益方包括：**CSRS** 的客户、通过管理体系认证的客户、贸易协会行业的代表、政府监督机构或政府服务机构的代表、或者是非政府组织的代表，包括消费者组织。

6.0 Responsiveness to complaints 投诉应答

6.1 Parties that rely on certification expect to have complaints investigated and, if these are found to be valid, should have confidence that the complaints will be appropriately addressed and that a reasonable effort will be made to resolve the complaints.

依靠认证的团体希望投诉被调查，如果发现调查是有效的，那么就应该有信心去恰当的处理投诉并且做出合理的努力去解决投诉。

6.2 Effective responsiveness to complaints is an important means of protection for **CSRS**, its clients and other users of certification against errors, omissions or unreasonable behavior.

有效的投诉应答对于解决**CSRS**、其客户和其他认证使用者防止错误、疏漏和不合理的行为是一个很重要的方式。

6.3 Confidence in certification activities is safeguarded when complaints are processed appropriately.

如果投诉获得适当处理，对认证的信心就可以获得保证。

7.0 Impartiality Complaints 公正性投诉

Any parties can raise impartiality related complaints or appeals to **CSRS**, accreditation bodies, and/or the governmental regulatory bodies.

任何组织或个人发现本认证机构或本认证机构人员有违反有关公正性所规定的情况，均可向本公司质量部投诉，或向认可机构投诉，或直接向监管机构、国家认可委/国家认监委投诉。

8.0 Risks to certified organizations 被审核公司的风险

Any corruption of this impartiality procedure may lead to the termination, withdraw or failure of the certification to facilities seeking certification.

对本《审核公正性管理程序》上的任何违反都可能会导致认证申请机构的认证审核活动被终止、撤销或失败。

9.0 Records and Reports 记录和报告

- 9.1 Threats identification and analysis report of impartiality to system certification
公正性识别和风险分析报告
- 9.2 Annual review record of Governing Board to Impartiality control
公正委员会年度评审记录。
- 9.3 **CSRS-GB** Governing Board Member List and TOR
CSRS-GB 的公正委员会成员名单和职责
- 9.4 Complaints to impartiality of **CSRS**, if any
如有，CSRS 公正性投诉处理报告

