

The top management's commitment to impartiality shall be demonstrated through:

1. Documenting the IPC-MDD's policy on safeguarding impartiality and ensuring that it is understood at all levels of the organization.
2. Having a defined institutional structure and procedure, appropriate implementation of policy, procedures and operation and conduct of its activities and personnel.
3. Having a system that ensures appropriate management of conflict of interest for ensuring objectivity of its certification functions.
4. Taking action to respond to any threats to its impartiality arising from the actions of other parts of the organization, persons outside of the organization, subcontractors, related bodies or other bodies or organizations.
5. The certification body and any part of the same legal entity and any entity under the organizational control of the certification body shall not offer or provide management system consultancy. This also applies to that part of government identified as the certification body. Where a client has received management system consultancy from a body that has a relationship with IPC-MDD, this is a significant threat to impartiality and mitigation of this threat is that IPC-MDD shall not certify the management system for a minimum of two year following the end of the consultancy.
6. Personnel of IPC-MDD involved in certification activities shall be bound by the certification body's impartiality policy and shall perform their duties impartially, in accordance with their contractual or employment obligations and specific assignment conditions for each evaluation or audit activity.
7. While carrying out evaluation/audit, IPC-MDD's personnel involved in certification activities shall not provide any advice, consultancy or recommendation to the client on how to address any deficiencies that may be identified during the evaluation/audit.
8. IPC-MDD shall require its personnel, internal and external, to report any situation of influence or pressure from the client that may threaten their independence in the course of certification activities. Based on such report, IPC-MDD shall take appropriate actions to ensure its independence in its certification work.
9. IPC-MDD shall not certify another certification body for its quality management system.
10. The certification body and any part of the same legal entity and any entity under the organization control of the certification body shall not offer or provide internal audits to its certified clients because the carrying out of internal audits by the certification body and any part of the same legal entity to its clients is a significant threat to impartiality.

- 11.** The certification body shall not outsource audits to a management system consultancy organization, as this poses an unacceptable threat to the impartiality of the IPC-MDD.
- 12.** The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides management system consultancy.
- 13.** In order to ensure that there is no conflict of interests, personnel who have provided management system consultancy, including those acting in a managerial capacity, shall not be used by IPC-MDD to take part in an audit or other certification activities if they have been involved in management system consultancy towards the client. A recognized mitigation of this threat is that personnel shall not be used for a minimum of two years following the end of the consultancy.
- 14.** IPC-MDD shall take action to respond to any threat to its impartiality arising from the actions of other persons, bodies or organization.
- 15.** All IPC-MDD personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially, and shall not allow commercial, financial, or other pressures to compromise impartiality.
- 16.** IPC-MDD shall require personnel, internal and external, to reveal any situation known to them that may present them or the certification body with a conflict of interests. Certification bodies shall record and use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and shall not use such personnel, internal or external, unless they can demonstrate that there is no conflict of interest.