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Judah Compliance Auditors is the legal entity responsible for certification activities; reference to Judah Compliance Auditors in this Policy and Public Statement refers to this legal entity.


Judah Compliance Auditors, it's Managing Member, Certification Manager, Staff and Sub-contractors fully understands the importance of impartiality in undertaking its Certification Activities. Judah Compliance Auditors 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.

- Judah Compliance Auditors 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
- Judah Compliance Auditors does not offer (and has never offered) management system consultancy or any other form of consultancy to companies or individuals.
- Judah Compliance Auditors does not offer (and has never offered) an internal audit service to its certified clients.
- Judah Compliance Auditors does not own or have any interest (financial or otherwise) in any other company that offers certification or management system consultancy services.
- Judah Compliance Auditors 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 Judah Compliance Auditors. Any proposed relationship between Judah Compliance Auditors 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.

	Issued by	Administration Officer
	Authorised by	Certification Manager
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- Individuals employed by or otherwise contracted to Judah Compliance Auditors 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 Judah Compliance Auditors to be declared. Judah Compliance Auditors 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.
- Judah Compliance Auditors will not allocate a member of staff or sub-contractor to a management system audit where any past relationship has existed. Exceptionally and at the discretion of the Certification Manager or Managing Member 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.
- Judah Compliance Auditors 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 a purchase order and invoice.


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- Judah Compliance Auditors does not offer specific training to any company in respect of implementing a particular standard for that company. Any training offered by Judah Compliance Auditors is general in nature and available to all companies or individuals who wish to attend.
- Judah Compliance Auditors 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.


Judah Compliance Auditors 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 Judah Compliance Auditors Policies.
- Judah Compliance Auditors shall not carry out any other conflicting services other than its core business of Certification.
- Judah Compliance Auditors shall not employ any professional conflicting its ethical policies.
- Judah Compliance Auditors shall not allow any of its auditors to market the services and conduct the audits for the same client.
- Judah Compliance Auditors shall not allow any of its auditors to carry out financial transactions with clients / consultants.

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- Judah Compliance Auditors shall not carry out business with any consultant inducing pressures to compromise impartiality.
- All employees of Judah Compliance Auditors shall disclose any situation impairing the business ethics.
- Judah Compliance Auditors shall not allow any of the auditors to carry out audits for the client at least for 2 years from the date of relinquishment from their services for the client.
- Judah Compliance Auditors shall not allow any auditor to compromise on the audit timing as required as per the accreditation/ Judah Compliance Auditors norms.
- Judah Compliance Auditors shall not allow any auditor to conduct the audit for the client for which it has not been approved for.
- Judah Compliance Auditors shall maintain transparency with regard to 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 Managing Member
- 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.
- Judah Compliance Auditors shall not allow any of its auditors to accept any gifts. In addition, all gifts or tokens from clients shall be declared to the managing director in writing.
- Judah Compliance Auditors 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.

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- The Impartiality Committee members are not remunerated for any of their functions, since such remuneration is deemed to be an impartiality risk; however, travel costs will be reimbursed.


Judah Compliance Auditors, its Managing Member, Certification Manager, Staff and others involved in the certification of organisations fully understand the importance of impartiality in undertaking its certification activities.

Judah Compliance Auditors 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, Judah Compliance Auditors has identified and risk assessed all relationships which may result in a conflict of interest or pose a threat to impartiality.


In terms of ISO 13485, JC Auditors and its auditors are impartial and free from engagements and influences which could affect the objectivity, and in particular shall not be:

- a) involved in the design, manufacture, construction, marketing, installation, servicing or supply of the medical device, or any associated parts and services
- b) involved in the design, construction, implementation, or maintenance of the quality management system being audited
- c) an authorized representative of the client organization, nor represent the parties engaged in these activities

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Issue Date	Issue No.	Reason for issue	Comment
31 January 2022		The policy has been amended to make provision and address the requirements of MD9	

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