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	Revision No.	4
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<b>IMPARTIALITY POLICY STATEMENT</b>		Page 1 of 4

Judah Compliance Auditors' Management and Sub-contractor auditors, technical experts and reviewers 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 process via the certification review committee .
- 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.
- 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

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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.
- 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 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.
- 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.


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- 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 for at least 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.
- 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, without declaring these in the audit checklist.
- Disciplinary actions for non-adhering to impartiality policies shall be taken by the Management where necessary.
- 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 management, 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.


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To ensure that impartiality is both maintained and can be demonstrated, Judah Compliance Auditors has conducted a risk assessment including assessment of 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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