

 <b>EAGLE</b> Certification Group <small>SERVICE • INTEGRITY • VALUE</small>	<b>Title: Impartiality</b>	Page 1 of 4
	<b>Document No: 25</b>	Version 17
<b>Owner Role:</b>		Effective Date: 04/23/2025
<i>EAGLE Certification Group includes EAGLE Registrations Inc. and EAGLE Food Registrations Inc.</i>		

## 1.0 PURPOSE

The purpose of this document is for EAGLE Registrations Inc. and EAGLE Food Registrations Inc. to define what principles, specific performances, and requirements, will allow its actions to be both impartial and perceived to be impartial. This is done in order to convey certification that provides confidence to all stakeholders. This document is written to meet the requirements of ISO17021, IATF Rules and ISO17065. Note: In the remainder of this document, “EAGLE” will represent both EAGLE Registrations and EAGLE Food Registrations.

## 2.0 SCOPE

This contains EAGLE’S requirement for reviewing and taking action for maintaining impartiality for the current and intended activities of EAGLE, the competence of the key personnel and the potential risks associated to EAGLE’s operations. This includes programs for both management system registration and product certification.

## 3.0 CONTENT / CONTEXT

### A. OBJECTIVITY

EAGLE’s quality system has taken into consideration that all activities must be objective and impartial. Objectivity means that conflicts of interest do not exist or if they do exist, they are resolved so as not to adversely influence subsequent activities in the certification process and decision. Certification activities are structured and managed to safeguard impartiality.

### B. OTHER TERMS

- 1) The following help EAGLE in defining the element of impartiality:
  - a. Objectivity
  - b. Independence
  - c. Freedom from Conflict of Interests
  - d. Freedom from Bias
  - e. Lack of Prejudice
  - f. Neutrality
  - g. Fairness
  - h. Open-mindedness
  - i. Even-handedness
  - j. Detachment
  - k. Balance

### C. OBTAIN AND MAINTAIN CONFIDENCE

- 1) EAGLE’s certification decisions will be based on objective evidence of conformity or nonconformity. Our decisions will not be influenced by other interests or non-related parties. EAGLE’s persons making certificate decisions of all types will be different from those persons who conducted the audits.
- 2) The certification body shall ensure that the activities of separate legal entities, with which the certification body or the legal entity of which it forms a part has relationships, do not compromise the impartiality of its certification activities.
- 3) When the separate legal entity in 3.C.2 above offers or produces the certified product (including products to be certified) or offers or provides consultancy (see 3.E.5), the certification body’s management personnel and personnel in the review and certification decision-making process shall not be involved in the activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the certification body, the review, or the certification decision.

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#### D. THREAT TO IMPARTIALITY

- 1) EAGLE will not allow:
  - a. A threat that arises from a person or body acting in their own interest.
  - b. A financial self-interest that would threaten impartiality.
  - c. Reviewing work done by yourself or certification body.
  - d. Auditing a management system that you consulted on in less than two years.
  - e. Being so familiar you trust instead of seeking audit evidence.
  - f. Intimidation threats of any kind in a certification process.
  - g. A threat that arises from the actions of other persons, bodies or organizations having a perception of being coerced openly or secretly, such as a threat to be replaced or be reported to a supervisor.

#### E. MANAGEMENT OF IMPARTIALITY

- 1) Policy statement: EAGLE's top management understands the importance and is committed to impartiality in strategy, policy, and management system certification activities. EAGLE manages conflict of interest and ensures the objectivity of the management system certification activities. All EAGLE personnel (either internal or external) or committees who could influence the certification activities shall act impartially.
- 2) EAGLE shall identify and document conflict of interests to demonstrate how it eliminates or minimizes such threats in EAGLE Risk Analysis using Work Instruction 127.
- 3) A relationship that threatens the impartiality of EAGLE can be based on but not limited to:
  - a. Ownership
  - b. Governance
  - c. Management
  - d. Personnel
  - e. Shared Resources
  - f. Finances
  - g. Commercial
  - h. Contracts
  - i. Marketing
  - j. Self-Threats
  - k. Self-Review Threats
  - l. Intimidation Threats
  - m. Other pressures to compromise impartiality
  - n. Payment of a sales commission or other inducement for the referral of new clients.
- 4) EAGLE will not certify another Certification Body (CB) for its management system certification activities.
- 5) EAGLE will not offer consultancy.
- 6) EAGLE will not provide internal audits for its certified clients.
- 7) EAGLE will not outsource its certified audits to a consultancy group.
- 8) EAGLE will not market or link its activities with a management consultancy organization.
- 9) EAGLE will not allow consultants to audit for a client for two years after any consultancy for that client.
- 10) EAGLE will not certify a client when EAGLE's relationship with the client's consultancy poses an unacceptable threat to impartiality.
- 11) EAGLE will not provide consulting services; this will include but not limited to documentation development, assistance in implementation of any management system and related training. Note: EAGLE may provide public training open to any person in a public forum and not for a single client.

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- 12) EAGLE requires a notification of any personnel revealing any situation known to them that can present them or EAGLE with a conflict of interest. For any conflicts, a minimum of two years separation from any certification activities will be used.
  - a. IATF-EAGLE sponsored auditors (or any related entity) may not consult for any EAGLE IATF clients. This is included in the IATF auditor contract F76 IATF.
  - b. Any related organization of EAGLE may not consult for EAGLE IATF clients (i.e. JV's, or MOUs)
- 13) EAGLE's top management will provide a statement regarding its impartiality practice to the general public.
- 14) EAGLE will not be the designer, manufacturer, installer, distributor or maintainer of the certified product.
- 15) EAGLE will not be the designer, implementer, operator or maintainer of the certified process.
- 16) EAGLE will not be the designer, implementer, provider or maintainer of the certified service.
- 17) EAGLE will not offer or provide management system consultancy or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.
- 18) EAGLE shall take action to respond to any risks to its impartiality, arising from the actions of other persons, bodies or organizations, of which it becomes aware.
- 19) The policies and procedures under which the certification body operates, and the administration of them, shall be non-discriminatory. Procedures shall not be used to impede or inhibit access by applicants, other than as provided for in ISO17065.
- 20) EAGLE shall provide access to the certification process. This access shall not be conditional upon the size of the client or membership of any association or group, nor shall certification be conditional upon the number of certifications already issued. There shall not be undue financial or other conditions.
- 21) EAGLE shall confine its requirements, evaluation, review, decision and surveillance (if any) to those matters specifically related to the scope of certification.
- 22) The certification body shall evaluate its finances and sources of income and demonstrate to the committee that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.
- 23) The certificate decisions shall be based on objective evidence of conformity or nonconformity obtained by the EAGLE and the decisions shall not be influenced by other interests or by other parties.
- 24) EAGLE maintains a Whistleblower process as identified in the Auditor and Employee Handbook that will drive transparency and reporting on issues of misconduct. The IC Committee will be informed of such complaints as appropriate, but at a minimum during annual BOG review. Methods to report these concerns are through EAGLE HR Director or other supervisor or through the EAGLE Website.

#### F. COMMITTEE FOR SAFEGUARDING IMPARTIALITY

- 1) EAGLE will have a representation of its Board of Governors (BOG)/Impartiality Committee (IC), which will have a balance of its interests and will meet annually to review the impartiality of the decision-making processes of its strategies and policies, certification process, auditing process and EAGLE Risk Analysis. The President or Chief Technical Officer (CTO) may have the IC chairman review any activity or risk analysis as needed throughout the year to give guidance to EAGLE's management that they should have the total BOG/IC review the given activity or risk analysis before the annually scheduled meeting. Although every interest cannot be represented in the mechanism, a certification body shall identify and invite significantly interested parties.
  - a. EAGLE will document the competence and responsibilities for each member along with its authorities and duties.
  - b. EAGLE will assure this committee has total access to information to allow it to fulfill its functions. This includes results of impartiality review results from internal audits

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- c. EAGLE will share information on any whistleblower investigation results with the IC Committee and relevant personnel.
  - d. The committee will understand that if EAGLE's management does not respect its advice it shall have the right to go to the Accreditation Body directly or informing the appropriate authorities or stakeholders.
  - e. In the activity the committee must respect the confidentiality of this client and EAGLE.
- 2) As members of the BOG, the IC members have signed declarations of confidentiality and absence of conflicts of interests.

#### 4.0 RESPONSIBILITIES

- A. The President or his designee will be responsible for the principles, requirements and specific performances of all EAGLE activities to assure its BOG, IC and the Board of Directors that impartiality exists in all certification process and decisions.
- B. The competencies for the IC should consider background in business, knowledge of EAGLE's Key Processes, governing documents (e.g., ISO17021 and 17065) and knowledge of environmental and/or quality management system requirements.
- C. The President shall appoint the chairman of the IC members for EAGLE. The normal period that the chairman of the IC serves is two years but the President may extend or shorten the period that each chairman serves.
- D. The role of the IC chairman is as follows, but not limited to:
  - 1) If any activity or risk analysis is identified throughout the year, the chairman shall give guidance to EAGLE's management whether the total BOG/IC should review the given activity or risk analysis before the annually scheduled meeting.
  - 2) If any vote on an item results in a tie the chairman shall make the deciding vote as the final decision for the committee.
- E. If the BOG/IC believes that EAGLE's management has not taken its guidance and feels that the process has not been impartial; the chairman will notify the appropriate scheme owner and/or oversight body.
- F. EAGLE will apply the Robert's Rules of Order for voting on any items. Therefore, the majority of the impartiality committee shall be at the meeting or the meeting will be rescheduled.
- G. The selection of the committee will make sure that the representation is balanced such that no single interest predominates.

#### 5.0 RECORDS AND REFERENCES

- All records and references for impartiality will be kept in EAGLE's data base allowing full access to all authorized personnel and BOG/IC members.
- Document 7 – Control of Records will define the general requirements of records.
- F76 IATF- Auditor Contract