

GULF TECH MANAGEMENT SYSTEMS MANUAL	Section	5.0 GENERAL REQUIREMENTS
	Subject	5.2 MANAGEMENT OF IMPARTIALITY
	COS Ref	COS-2-04-6.4

5.2 Management of Impartiality

5.2.1 Impartiality Policy

Gulf Tech is responsible for the impartiality of its conformity assessment activities and will not allow commercial, financial or other pressure to compromise impartiality. Conformity assessment activities will be undertaken impartially. Statements of Impartiality for Gulf Tech and its employees can be found in **PLCY-GMSM-5.2.2** and **PLCY-GMSM-5.2.3**, respectively. These statements will be kept in the Gulf Tech Business Records file.

5.2.2 Gulf Tech Impartiality

Gulf Tech is committed to impartiality in its management system certification activities. See Section 5.2.1.

5.2.3 Employee Impartiality

Gulf Tech employees are committed to impartiality in its management system certification activities. See Section 5.2.1.

Process for Verifying Employee Project Impartiality: The process is to follow the Impartiality Determination Procedure, **PRCD-GMSM-5.2.3**.

Before the assignment of auditors to audit teams takes place, auditors will certify via signature (on **FRM-GMSM-5.2.3**) to the Gulf Tech COO if he/she has/has not worked in any capacity related to management systems or SEMS during the previous two (2) years for the client in question and can be impartial. Based on this information, any two of Gulf Tech's CEO, COO and President shall determine whether any auditor relationships could interfere with the auditor's impartiality. Auditors shall not be assigned to clients with whom impartiality cannot be sufficiently assured. Records of the impartiality determination documented on **FRM-GMSM-5.2.3** shall be retained in the individual Project File. Gulf Tech will not accept a certification project in the event a relationship poses an unacceptable threat to impartiality.

5.2.4 Other Certifications

Gulf Tech shall not certify another certification body for its management system certification activities.

5.2.5 Consultancy (COS-2-04-6.4)

Gulf Tech shall not offer or provide management system consultancy. This also applies to that part of government identified as the certification body.

During the audit process, Gulf Tech may provide generic information to the client, for the improvement of SEMS. Such information may include:

- Explaining the meaning and intention of certification criteria;
- Identifying improvement opportunities;
- Explaining associated theories, methodologies, techniques or tools;
- Sharing non-confidential information on related best practices;
- Other management aspects that are not covered by the management system being audited.

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5.2.6 Internal Audits for Certified Client

Gulf Tech shall not offer or provide internal audits to its certified clients. Gulf Tech shall not certify a management system on which it provided internal audits within two years following the end of the internal audits. This includes the certification body.

5.2.7 Management System Consultancy (COS-2-04-6.4)

Gulf Tech shall not certify a management system on which it has provided management system consultancy or internal auditing within two years following the end of the management system consultancy or internal audit.

5.2.8 Outsourcing

Gulf Tech will not outsource audits to a management system consultancy organization.

5.2.9 Marketing

Gulf Tech will not market its activities as linked with an organization that provides neither management system consultancy, nor state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used. In the event, that, independent of Gulf Tech, a claim is made stating or implying that certification would be simpler, easier, faster or less expensive if a specified consultancy organization were used, Gulf Tech will take action to correct these claims, indicating that they are inappropriate.

5.2.10 Employees who have Provided Management System Consultancy

Personnel who have provided management system consultancy, including those acting in a managerial capacity, shall not be used by the Gulf Tech to take part in an audit or other certification activities if they have been involved in management system consultancy towards the client in question within two years following the end of the consultancy.

5.2.11 Threats to Impartiality

Gulf Tech shall take action, up to and including legal action, to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.

5.2.12 Commercial, Financial or Other Pressures Compromising Impartiality

All Gulf Tech personnel, internal, external, or committees, shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality.

5.2.13 Signed Statement of Confidentiality and Impartiality

Gulf Tech will require all personnel associated with certification activities to reveal any situation that may cause a conflict of interest prior to assignment to a specific audit. Additionally, potential auditors will sign a statement on attesting to confidentiality (**FRM-GMSM-8.4.1**) and impartiality (**FRM-GMSM-5.2.3**) annually. This signed confidentiality statement will be kept in the individual's personnel file. The Impartiality Statement will be kept in Gulf Tech's Business Records File. Gulf Tech's impartiality committee, consisting of its CEO, COO and President will review statements and information provided prior to assignment of individuals to audit teams.



MANAGEMENT OF IMPARTIALITY POLICY

GMSM Ref

5.2.2 Management of Impartiality

Policy No.

PLCY-GMSM-5.2.2

Statement of Impartiality

Gulf Tech appreciates the significance of impartiality and is considerate of potential conflicts of interests in delivering objective certification activities. Gulf Tech places vital importance on the impartiality and integrity of its certification activities.

An impartiality review of each audit and certification conducted is performed annually during the Gulf Tech management review.

Additionally, impartiality, conflict of interests and objectivity are addressed in annual training and contractual agreements.



Georges Michaud, CEO Gulf Tech

2/11/2016
Date



STATEMENT OF IMPARTIALITY

GMSM Ref

5.2.3 Management of Impartiality

Policy No.


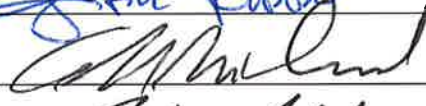
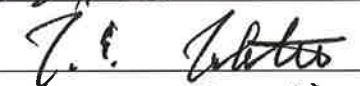
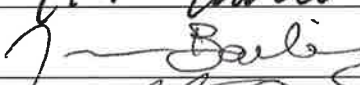
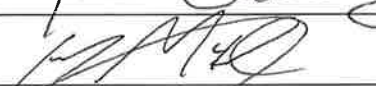
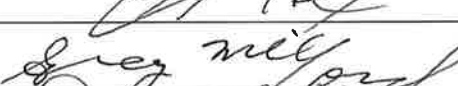
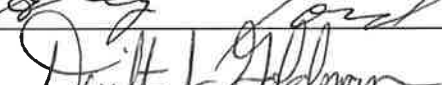

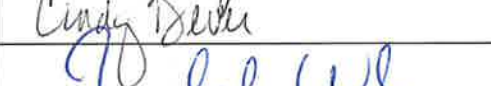
PLCY-GMSM-5.2.3

Statement of Impartiality-Internal Auditors

Gulf Tech appreciates the significance of impartiality and is considerate of potential conflicts of interests in delivering objective certification activities. Gulf Tech places vital importance on the impartiality and integrity of its certification activities.

An impartiality review of each audit and certification conducted is performed annually during the Gulf Tech management review.

Additionally, impartiality, conflict of interests and objectivity are addressed in the initial training and contractual agreements.

Auditor Name (Print)	Signature	Date
JASON PERRIN		2/10/16
GEORGES MICHAUD		2/11/16
JAMES JOHNSTONE		2/11/16
JAMES BAILEY		2/22/16
Corey McDaniel		2/23/16
GREG MILFORD		2/23/16
Dwight J. Goldman		3/2/16
Cindy Dever		3/2/16
FRED WOODY		4/6/2017