

CAPITAL MANAGEMENT CONSULTANCY & DEVELOPMENT CENTER



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PROCEDURE

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1. REVISION AND APPROVAL

Rev.	Date	Nature of Changes	Approved By
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1. Purpose

The purpose of this procedure is to ensure that all inspection activities are performed impartially, independently, objectively, and confidentially in accordance with ISO/IEC 17020 requirements and applicable UAE accreditation requirements.

2. Scope

This procedure demonstrates the impartiality, independence and confidentiality of the inspection activities and documentation related to the capital management consultancy & development centre inspection department and clients.

3. References

- ISO/IEC 17020 – Conformity Assessment – Requirements for the Operation of Various Types of Bodies Performing Inspection
- Applicable ENAS Accreditation Requirements
- Company's Quality Manual

4. Definitions

Impartiality: Presence of objectivity whereby conflicts of interest do not influence inspection results.

Independence: Freedom from commercial, financial or other pressures that could influence inspection decisions.

Confidentiality: Protection of client information obtained during inspection activities.

5. Responsibilities

- Top Management of Capital Management Consultancy & Development Center demonstrated commitment to impartiality by ensuring adequate resources are available, reviewing impartiality risks at least annually, and approving appropriate

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mitigation actions to maintain the integrity, independence, and impartiality of all inspection activities.

- Quality Manager shall maintain the Impartiality Risk Register, monitor the implementation and effectiveness of this procedure, conduct awareness training on impartiality and confidentiality, and report the status and findings during Management Review meetings.
- **Inspectors** shall declare any actual, potential, or perceived conflicts of interest, maintain the confidentiality of all information obtained during inspection activities, and promptly report any external, commercial, financial, or managerial pressures that may compromise their impartiality or independence.
- All Personnel involved in inspection body shall sign the required Confidentiality and Conflict of Interest Declarations and comply with this procedure to ensure the impartiality, independence, and confidentiality of all inspection activities.

6. Procedure

6.1 Commitment to Impartiality

Capital Management Consultancy & Development Center is committed to conducting all inspection activities in an impartial, independent, objective, and ethical manner. Inspection personnel shall perform inspections free from commercial, financial, or other pressures that could compromise impartiality. The Inspection Body shall not engage in consultancy services related to activities that it inspects, and all inspection decisions shall be based solely on objective evidence, applicable standards, and inspection findings.

6.2 Identification of Impartiality Risks

The Quality Manager, together with Top Management, shall identify and evaluate risks that may affect the impartiality and independence of inspection activities. Such risks may arise from financial interests, family or personal relationships, previous consultancy services, gifts or hospitality, client influence, management pressure, ownership interests, incentive or bonus schemes, or any other situation that may create an actual, potential, or perceived conflict of interest. All identified risks shall be documented and maintained in the Impartiality Risk Register.

6.3 Risk Assessment

Each identified impartiality risk shall be assessed by considering its likelihood of occurrence, potential impact on the integrity of inspection activities, existing control measures, and the resulting residual risk. The Quality Manager shall review and update the Impartiality Risk Register whenever new risks are identified or significant organizational changes occur.

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6.4 Risk Mitigation

Where impartiality risks are identified, appropriate actions shall be implemented to eliminate or minimize the associated risk to an acceptable level. Mitigation measures may include assigning an alternative inspector, conducting an independent technical review, increasing supervisory oversight, removing personnel with conflicts of interest from inspection activities, or declining or terminating inspection services where impartiality cannot be assured. All mitigation actions shall be documented.

6.5 Declaration of Conflict of Interest

All personnel involved in inspection activities shall complete a Conflict of Interest Declaration upon employment and annually thereafter. Prior to accepting any inspection assignment, personnel shall declare any actual, potential, or perceived conflicts of interest that may affect their impartiality. Any new conflict arising during the course of work shall be reported immediately to the Quality Manager. Personnel with declared conflicts shall not participate in the affected inspection activities unless the conflict has been appropriately evaluated and resolved.

6.6 Confidentiality

Capital Management Consultancy & Development Center shall maintain the confidentiality of all information obtained or created during inspection activities. Client information shall not be disclosed to any third party without written authorization from the client, unless disclosure is required by applicable laws, regulations, contractual obligations, or accreditation requirements. Where legally permitted, the client shall be informed before such information is released.

6.7 Protection of Confidential Information

Confidential information shall be safeguarded through appropriate physical, electronic, and administrative controls. These controls include password-protected information systems, controlled user access, secure electronic backups, locked storage for hard-copy records, restricted access to confidential documents, and secure disposal of obsolete records to prevent unauthorized disclosure.

6.8 External Personnel

External inspectors, subcontractors, technical experts, temporary personnel, and any other individuals engaged in inspection activities shall sign Confidentiality and Conflict of Interest Agreements before being authorized to perform any work on behalf of Capital Management Consultancy & Development Center. Their activities shall be subject to the same impartiality and confidentiality requirements as permanent employees.

6.9 Reporting of Undue Influence

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Any employee or external personnel who experiences commercial, financial, managerial, or other undue influence that could compromise impartiality shall immediately report the matter to the Quality Manager and Top Management. All reported incidents shall be investigated promptly, appropriate corrective actions shall be implemented, and records of the investigation and actions taken shall be maintained.

6.10 Monitoring and Review

The effectiveness of this procedure shall be monitored through periodic internal audits, management reviews, evaluation of client complaints and feedback, review of Conflict of Interest Declarations, monitoring of the Impartiality Risk Register, assessment of confidentiality breaches (if any), and annual reviews of impartiality risks. Opportunities for continual improvement shall be identified and implemented to ensure ongoing compliance with ISO/IEC 17020:2012 and ENAS accreditation requirements.

7. Records

Capital Management Consultancy & Development Center shall establish, maintain, and retain records as objective evidence of the effective implementation of this procedure. The following records shall be controlled in accordance with the organization's Document and Record Control Procedure and retained for the specified retention period:

- Impartiality Risk Register
- Conflict of Interest Declaration Forms
- Confidentiality Agreements
- Impartiality Committee Meeting Minutes (where applicable)
- Management Review Records
- Internal Audit Reports
- Corrective Action Reports
- Records of Reported Impartiality or Confidentiality Incidents (where applicable)
- Training and Awareness Records related to Impartiality and Confidentiality
- Records of Risk Assessments and Mitigation Actions

All records shall be maintained in a secure manner to ensure their confidentiality, integrity, traceability, and availability, and shall be accessible only to authorized personnel.