

## **Conflict of Interest and Impartiality Risk Analysis**

### **Scope:**

This document aims to define the general policies and provisions implemented in order to Comply with the requirements of the ISO/IEC 17021 with respect to independence, objectivity and impartiality.

This document refers to and complies with the relevant sections of the CC-Quality Manual.

### **Application:**

This procedure is applicable to the ControlCase Infosec Pvt. Ltd

### **Policy Statement**

CC IPL Top Management makes the following public statement of Impartiality:

### **Impartiality Statement**

ControlCase Infosec Pvt Ltd's (herein and after referred as CC IPL) Code of Ethics stresses the importance of never compromising on our impartiality, independence & integrity.

The CC IPL ensures that none of its assignment will cause any conflict of interests which would hamper the impartial business practices of CC IPL and ensures objectivity in certification process and decision making.

To maintain the impartiality CC IPL's ISO certification activities, the organization shall follow following guidelines:

1. Business relationships which pose an unacceptable threat to impartiality will not be pursued by CC IPL for certification assignments.
2. CC IPL will not provide certification services to other certification bodies for their management systems.
3. CC IPL will not offer or provide information security management system consultancy to clients which are certified by CC IPL.
4. CC IPL will not offer or provide ISMS internal audits to its certified clients and does not certify a management system on which it provided ISMS internal ISMS audits.
5. CC IPL will not certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and CC IPL poses an unacceptable threat to the impartiality of the certification body.

6. **CCIPL** will not outsource audits to management system consultancy organizations.
7. **CCIPL** will not offer or market its services as linked with the activities of an organization that provides management system consultancy. **CCIPL** shall take actions against to correct inappropriate claims by any consulting organization.
8. To ensure that there is no conflict of interests, personnel who have provided management system consultancy, including those acting in a managerial capacity, are not used 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.
9. **CCIPL** will consider taking appropriate action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.
10. All **CCIPL** personnel, either internal or external, or committees, who could influence the certification activities, act impartially and do not allow commercial, financial or other pressures to compromise impartiality.
11. **CCIPL** will not state or imply that certification would be simpler, easier, faster or less expensive.
12. All personnel, internal and external, are required to reveal any situation known to them that may present them or the certification body with a conflict of interests.
13. The Committee for Safeguarding Impartiality shall periodically review conformance with the impartiality requirements of ISO 17021.

## **Procedure**

CCIPL has a publicly available statement on its policy with regards to the principle of Impartiality. This policy statement contained in this document is publicly available on the CCIPL website. The statement is reviewed in the management review meeting by the committee of every year.

The threats identified include

- Self interest
- Self-review
- Familiarity
- Intimidation

Apart from the consideration taken care by the Top Management regarding the Impartiality and the Conflict of interest for the organizations where Provision for Certification has been initiated. An independent identification, analyses and evaluation was conducted by the Internal Audit team to ensure risks are highlighted and documented related to Conflict of interest’.

CC IPL will regularly monitor and treat the risks arises due to any 'Conflict of interest'. Also, review will be performed to validate the residual risk and to determine if it is within the level of acceptable risk. The potential threats to impartiality are defined in the – Risk Register