

BENCHMARK HOLDINGS, LLC

IMPARTIALITY POLICY

Benchmark Holdings, LLC (BMH), representing both Benchmark International, LLC (BMI) and Benchmark Consulting and Inspection, LLC (BCI), (hereinafter collectively referred to as “BMH”) is an accredited third-party Product Certification, Test, and Inspection company.

BMH operates under the principles of third-party independence with regard to Integrity, Objectivity, Excellence, Confidentiality, Safety and Impartiality. BMH conducts its activities under non-discriminatory conditions that include freedom from bias, freedom from prejudice, and that ensures neutrality, fairness, open-mindedness, even-handedness and balance. BMH will not be the designer, manufacturer, installer, distributor or maintainer of the certified product. These principles are carried through all of BMH’s service lines.

To promote achievement of these objectives, BMH top management has established this Impartiality Policy and has the responsibility and authority to assure this policy is implemented and continually improved to meet the continuing needs of BMH, its clients, and other interested parties.

All BMH personnel shall avoid situations where a risk to impartiality arises, a potential conflict of interest could exist, or could be seen to exist. A conflict of interest occurs when an individual or organization is involved in multiple interests, one of which could possibly influence the motivation for an act in the other.

The following policy statements have been incorporated to ensure that impartiality is maintained and implemented:

- 1.1.** BMH shall be responsible for the impartiality of its activities and will not allow commercial, financial or other pressures to compromise the integrity, objectivity, or confidentiality of the services it provides. Impartiality and independence of BMH’s activities are assured at both the organizational and personal level.
- 1.2.** BMH identifies, documents, assesses, and takes action as appropriate to mitigate or eliminate risks to impartiality on an ongoing basis. Risk management procedures are defined or referenced in the BMH Quality System. BMH will 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.
- 1.3.** At the organization level, impartiality and objectivity of certification decisions is safeguarded by BMH management through the establishment and implementation of decision-making procedures.
- 1.4.** External oversight of BMH’s impartiality process is maintained by the BMH Impartiality Committee which meets at least annually. The terms regarding the role, responsibilities, and function of the Impartiality Committee are described in the BMH Quality System.
- 1.5.** At the personal level, independence and impartiality is safeguard by the contractual and “case-by-case” obligation of all BMH personnel (including permanent employees, contractors, and consultants) to disclose all real or potential conflicts of interest at the time the conflict becomes evident. Top management is responsible for ensuring that none of BMH’s activities affect the confidentiality, objectivity, or impartiality of the delivered certification or assessment services.
- 1.6.** When selecting resources to be appointed for a specific assessment activity, the manager is responsible to ensure each individual is free from any interests that might cause them to act in other than an impartial or non-discriminatory manner. Where questions arise, the manager shall contact his/her supervisor or a member of top management for resolution. Prior to the assessment, individuals are obligated to disclose any existing or envisaged link between themselves and the organization to be assessed.
- 1.7.** To avoid a conflict of interest, no certification-related consultancy will be provided to an organization, which will be the subject of certification or assessment, unless it is required or allowed by the certification/verification scheme.

Certification-related consultancy is defined as participation in an active creative manner in giving specific advice towards the development and implementation of management systems covered by the scope of the evaluation to the client or organization being subject to the certification evaluation.

- 1.8.** BMH is a client-focused company that aims to promote conformance to specified requirements and the continual improvement of both its operation and that of its clients. The following activities are not considered certification-related consultancy by BMH:
 - 1.8.1.** Planning and organizing general information meetings, workshops, courses, or conferences regarding certification, resource management, and other issues within the scope of BMH's activities;
 - 1.8.2.** Providing generic tools and guidance for certified clients and clients preparing for certification;
 - 1.8.3.** Arranging and participating as lecturer in above-mentioned events with presentations that are confined to the provision of general information and advice which is freely available in the public domain, and not providing company-specific advice;
 - 1.8.4.** Making available or publishing on request information related to the interpretation of the requirements of an assessment standard;
 - 1.8.5.** Conducting activities prior to assessments aimed solely at determining readiness for assessment, which do not result in the provision of recommendations or advice;
 - 1.8.6.** Adding value during assessments or surveillance inspections, by identifying opportunities for improvement as they become evident during the assessment;
 - 1.8.7.** Completing projects related to any topic within BMH's scope of activities that are confined to tasks which do not have a direct relation to the client or organization assessed or to be assessed for certification;
 - 1.8.8.** Any other activities which are not considered as participation in an active creative manner in giving specific advice to a client or organization being subject to eventual certification within the scope of the certification activities.
- 1.9.** BMH has established and maintains applicable Complaints, Appeals, and Disputes procedures to manage and respond to the concerns of our clients and other interested stakeholders. Clients and other interested parties are invited and encouraged to provide input regarding the quality of BMH's services and the provisions for ensuring the impartiality of its activities. Clients and other interested stakeholders are made aware of how they can contact BMH's accreditation providers if complaints are not resolved appropriately, if they feel there is a conflict of interest, or if they feel certification decisions are not impartial. This Impartiality Policy will be posted on the BMH-BMI website at www.Benchmark-Intl.com.