

ADISA[®]

CERTIFICATION

Impartiality Policy			
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Approved By	Lisa Mellings	Date Issued	12.08.2026
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Introduction

ADISA Certification operates all business activities in an unprejudiced and unbiased manner to maintain a just and fair approach for customers.

All ADISA Certification employees take full commitment and responsibility to maintain this impartial position during all aspects of the certification process. This policy outlines how ADISA as a business ensures impartiality is at the centre of all certification activities.

Scope

This policy applies to:

- All stakeholders including employees, certified companies and users of certified companies.
- All stakeholders for the CUPAS Scheme

Policy Details

There are three areas where loss of impartiality can impact on the business:

- Conscious loss of impartiality by the business or personnel due a clear conflict of interest causing a decision to be made differently for one applicant / certified company than another.
- Unconscious loss of impartiality by the business or personnel due to previous experience or knowledge being applied to a situation leading to a prejudiced or bias decision being made.
- Inconsistency in process or procedure which leads one certification to be carried out different that another.

As a business ADISA has recognised the following as risks to impartiality and bias and have assessed their position accordingly as listed below.

Risk	Treatment
Self Interest - This is an employee risk where there might be a vested interest in an applicant for certification. This interest could be a financial arrangement or a material benefit that is gained by the employee by favouring the applicant in a beneficial way.	All employees involved in certification undergo an impartiality assessment in which they declare any knowledge or interest in any existing customer or for all new customers.

Self-Review -This is a business and employee risk where an auditor would be offering guidance before or after an audit which would enable an applicant to present themselves as directed by the auditor. (Marking their own work)	All employees involved in certification are trained to ensure they know they are NOT permitted to make recommendations for how an organisation can make themselves or a process compliant. ADISA does not consult or offer any consultancy services.
Advocacy -This is considered a business and employee risk where the company or the employee acts in support to, or in opposition against, a given client.	All companies are offered the same opportunities to collaboration with ADISA in terms of promotional activity. During any such activity ADISA never recommends one company over another BUT will advocate the use of certified companies as a whole.
Over Familiarity -This is considered an employee risk due to the threat arising from someone becoming too trusting and too involved leaving them unable to carry out an audit in an objective manner.	It is inevitable that relationships overtime become familiar and ADISA employees are trained to ensure they understand the parameters when a relationship with a customer or a customer employee has become too familiar.
Intimidation -This is considered an employee and a business risk to impartiality if an entity tries to coerce, by bribery with material goods/money, by threatening the wellbeing of the auditor or the business itself.	ADISA trains its employees to recognise signs of coercion and to report any acts of bribery should they occur. ADISA management understand the risk posed to the business of a client becoming too influential to the business by means of contract value. The commercial impact of clients on the business is not shared with the auditing function at ADISA and there is no obligation for the audit function to factor commercial interests of the business into their own activity.
Competition -This is considered a risk to impartiality as it would be impossible to remain impartial should the applicant and the auditor be involved in the same business activities.	ADISA does not have any interest in an ITAD business or carry out any ITAD activities. ADISA employees are not permitted to undertake any employment outside of ADISA nor create any commercial relationships with companies or entities outside of ADISA without prior disclosure and approval from ADISA.

Employee

Training and Awareness

There are various stages to employee Impartiality awareness which are:

- Employee impartiality training and awareness concluded by the signing of an Impartiality Attestation Document.
- Initial Impartiality interview where every client is listed, and all employees involved in the certification process confirms any relationships and / or reasons where their impartiality could be compromised.

- For all new clients there are impartiality interviews for all those involved in the certification process.
- Every year the overall client impartiality interview is repeated, and the Impartiality Attestation Document is reviewed and signed again.
- Employees are advised to self-monitor and where they feel that the own ability to act impartially may be called into question, they should make their line manager know such that a risk assessment can be taken which may or may not result in additional controls being put in place for specific clients.
- Employees are also advised to be aware of colleague behaviour, and should they feel colleagues' impartiality is compromised, they are to inform the line manager. If the disclosure is not reviewed appropriately, they are advised to follow the whistleblowing process.

Whistleblowing

When employees feel that ADISA has not acted sufficiently to address identified concerns, they are encouraged to follow the Impartiality process on the website to share concerns they might have with the impartiality mechanism.

Certification Process.

ADISA follows the same process for all type of certification and ensures that applicants are treated the same.

Every type of certification follows a rigorous process workflow which includes review sign off stages performed by a qualified member of the ADISA not directly involved in that part of the certification.

Evidence is compiled during each type of certification and is saved centrally for a final review and sign off before any award is made. This information can be used to investigate appeals or complaints.

During a certification process, any applicant can appeal against a decision made by an auditor or analyst using the appeals process.

Outside of a certification process, any entity can complain about ADISA or about certified companies by using the complaints process. Both are available via our website.

Companywide impartiality.

The Directors of the business are committed to impartiality and ensure the company promotes consistency and fairness throughout operations. At the quarterly directors' meetings there is an impartiality risk assessment carried out with actions recorded in the minutes and allocated to individuals to carry out. The risk assessment is shared with the Impartiality Mechanism as part of their own review.

Impartiality Mechanism

ADISA's certification activities are underpinned by the need to always remain impartial. This is overseen by an independent impartiality mechanism called the Impartiality Council. This is made up of volunteers who agree to abide by the Impartiality Council Policy.

The Mechanism functions in two ways:

Annual Meeting. Each year a report is produced which details ADISA's business activities highlighting any activities which could impact our ability to remain impartial. This report is shared with the Council at least one month prior to the meeting to allow the contents to be reviewed.

The meeting is chaired by the Council Chair and follows an agreed agenda which includes a period where ADISA leaves the room to allow open discussion to take place under Chatham House rules regarding the report. When ADISA is permitted entry back to the room, the meeting will then start to have minutes taken to record the discussions which take place. The objective of the meeting is to review how ADISA ensures its operations are impartial at all times. The minutes are distributed to all within one week for acceptance and final approval by the Chair.

On Demand. In addition to the annual meeting, this council is convened on demand should an impartiality issue be raised with the Council via a form on the website. When this form gets completely it is sent to the committee via an email alias set up and without any screening by ADISA, The Chair is then responsible for review and to make recommendations to the Council on appropriate actions which could be:

- Dismiss the form as there is insufficient detail or the report is viewed a vexatious.
- Convene a meeting to discuss the submission with the objective to decide on any / next actions.
- Request comment from ADISA relating to the form to allow further discussion.

The council is directed by the Impartiality Council Policy, and should the council feel ADISA is not taking their actions appropriately they can escalate to UKAS.

Document Changes

Change from 1.0 to 1.1.

CIA / N/A	Where is the change	Change made	Version Number
Gram Error N/A	Impartiality Policy	Grammar corrected and revalidated for further 12 months	1.0 to 1.1

Change from 1.1 to 2.0

CIA / N/A	Where is the change	Change made	Version Number
84	Impartiality Policy	Complete re-write to address short comings in the advisory council	Renamed as v2.0

Change from 2.0 to 2.1

CIA / N/A	Where is the change	Change made	Version Number
180	Impartiality Policy	Update to reflect the new Impartially council mechanism that is convened on demand.	V2.1