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## **NVT/QP/2/20: PROCEDURE FOR IMPARTIALITY POLICY**

NVT provides quality system audit and certification service to all customers in a consistent and reliable manner, facilitating improvements in their business process and acceptance on national and international level.

NVT understands the importance of impartiality in carrying out its management certification activities. NVT analyses conflict of interest, manages conflict of interest and ensures the objectivity of its management system certification activities

It is the policy of NVT QC to operate its Certification operations by ensuring the viability of the value of certification, accessibility of its services to all users of Certification and these shall be applied in a manner necessary to preserve the guiding principles of impartiality, competence, responsibility, openness, confidentiality and responsiveness

NVT-QC's management ensures that the committee for safeguarding impartiality have a person(s) with continuing aviation, space, or defense industry involvement through relevant work experience in the industry (i.e., involvement with aerospace manufacturing/maintenance, the NAA, NAIA, or equivalent) as part of its structure.

NVT-QC has constituted a committee of experts with the following terms of reference:

- a. Assisting in developing policies related to impartiality of NVT-QC's certification activities.
- b. To counteract any tendency for commercial or other considerations to prevent consistent, objective provision of certification activities.
- c. To advise on matters affecting confidence in certification including openness and public perception.
- d. To conduct annual reviews of the impartiality of the audit, certification and decision making processes of NVT-QC. For this purpose the committee of experts may form sub committees.

Rules for constitution of this committee are as under:

- a. The committee shall have minimum 5 members
- b. Chairman of the committee shall be a senior professional from an institute of learning in the field of quality management
- c. Committee shall have balanced structure to represent key interest such as: clients, customers of organization whose management systems are certified, representative of Indian trade association, representative of government regulatory body or other government services, or representative of nongovernmental organization or consumer organization. It shall have at least one person with experience in aviation, space or defense industry (i.e. involvement with aerospace manufacturing/maintenance, NAA, NAIA or equivalent)

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- d. Committee members shall be known experts in their areas and shall have knowledge of the certification. They shall be agreeable to spare their time for committees' deliberations and abide by the confidentiality agreement. They shall have a clean record.
- e. Once the committee is formed, additions and deletions to the committee shall be with the approval of the management committee.
- f. Committee members who have been consistently unable to participate in the deliberations will be considered for deletion.
- g. The term of membership of the committee will be for 5 years and re-nomination can be for further periods of 5 years each
- h. The quorum for committee of experts shall be minimum 3 members having one representative from each major area. If any member expresses his inability to attend the meeting in the last minute, the meeting shall be continued. But the minutes shall be circulated to all members including those absent for their review.
- i. Input to the committee will include among other details, management's report on analysis of conflict of interest and audit report on impartiality.
- j. In the absence of Chairman of the committee of experts, members present will decide the Chairman of the meeting.

NVT-QC provides on an ongoing basis all necessary information to the committee of experts to enable it to fulfill its functions. This includes information on its finances and sources of income through an audit. Top management of NVT-QC shall abide by the decisions of the committee of experts. The committee has the authority to take independent action including informing accreditation board (s) in case its directive is not implemented by NVT-QC

NVT QC carries out every year risk analysis associated with & in providing competent, consistent and impartial certification services, which includes:

1. Risk due to Auditors' Conflict of Interest/ Residual Risks
2. Risk from conflict of interest due to providing training program/ Residual Risks
3. Risk from conflict of interest due to stakes in any organization certified by NVT QC/  
Residual Risks
4. Risk from conflict of interest due to having provided services other than certification/  
Residual Risks
5. risk due to ownership/ residual risks
6. risk due to governance & management/ residual risks
7. Risk due to personnel employed by NVT QC / residual risks
8. Risk due to shared resources/ residual risks
9. Risk due to state of finances/ residual risks
10. Risk due to contracts & marketing/ residual risks
11. Risks associated with objectives of audit/ residual risks

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12. Risk associated with sampling used in the audit process/ residual risks
13. Risk associated with legal, regulatory and liability issues/ residual risks
14. Risk associated with the client organizations being audited and its operating environment including health & safety of audit team/ residual risks
15. Risk associated with perception of interested parties/ residual risks
16. Risk associated with misleading statements by the certified client & use of marks/ residual risks
17. Risk associated with other services/ residual risks
18. Risks associated with subcontract auditors / residual risks
19. Risk involved in transfer of certified organisations from other registrars to NVT QC / residual risks
20. Risk assessment based on openness and public perception