

## GENERAL PROVISIONS

GLI Secure's Certification Body (hereafter referred to as GLI Secure) declares that it will comply with the requirements of and ensure impartiality within all its Management System certification activities for all the personnel related to the activities.

The confidentiality, objectivity and impartiality of the certification activities by and on behalf of GLI Secure, shall not be affected by the activities of the certified clients.

The scope of this document is to address the requirements laid down in section 5.2 of ISO/IEC 17021-1:2005.

## IMPARTIALITY

**1.1.** GLI Secure understands and is fully aware of the importance of management of impartiality in carrying out its certification activities.

GLI Secure staff is fully committed to ensuring that all certification activities are impartial.

All GLI Secure Auditors are not involved in commercial, financial and other pressure (trade, administrative, moral) to compromise their impartiality.

It is the policy of GLI Secure to disqualify any representative from the responsibility of performing assessment or audit activity for any company in which the representative has a prior interest. This includes (but is not limited to):

- a vested interest in the assigned client,
- prior employment by the client in some capacity within the past two years,
- prior provision of consulting services to the client within the past two years

Any relationships between GLI Secure or individuals employed by GLI Secure with other organizations or individuals will be declared, reviewed, documented and risk assessed.

**1.2.** GLI Secure has documented structures, policies and procedures to manage impartiality and to ensure that the certification activities are undertaken impartially, and has top management committed to impartiality in the management certification activities. GLI Secure has no relationship (formal or informal) with any other company or organization which may result in a conflict of interest arising from its certification activities. GLI Secure has identified and analyzed (risk assessed) all relationships (formal or informal) with other organizations or individuals which may result in a conflict of interest arising from its certification activities. Should the company propose to enter into any relationship with another company or organization or enter into any new area of business, that relationship or new area of business will be reviewed by GLI Secure to ensure that impartiality can be demonstrated, and the integrity of the Certification process assured. All risks to impartiality are mitigated and reported to management on a bi-annual basis.

**1.3.** GLI Secure identifies, analyzes and documents all possibilities for conflict of interests that emerge from the certification processes including any conflicts that emerge from its relations.

Presence of relations does not necessarily position GLI Secure in a situation of conflict of interests. If some relations create impartiality threats, GLI Secure documents and eliminates or mitigates such threats.

GLI Secure reviews risks to impartiality on an ongoing basis. The information resulting from the review of risks to impartiality is presented to management.

It is necessary to cover all possible conflict of interests' sources that are identified regardless of their origin.

GLI Secure shall use this information as input in identifying threats to impartiality raised by the activities of such personnel or by the organization that employ them.

GLI Secure requires all employees, internal and external, to comply with impartiality policies.

All GLI Secure auditors and where applicable external experts are required to sign the GLI Secure Confidentiality and Impartiality Declaration before each assignment in order to reveal any situation known to them that may present them or GLI Secure with a conflict of interests.

GLI Secure shall not undertake any action that threatens the impartiality and/or are potential conflict of interests.

When certain relations create unacceptable impartiality threat, the certification shall not be conducted.

**1.4.** GLI Secure shall not certify another certification body for its activities related to its quality management system.

To show effective implementation of policy, GLI Secure will not provide and allow the following:

- Certification services on behalf of other certification bodies

**1.5.** GLI Secure shall not provide and allow the following:

- Consultancy services for realization, continuity and sustenance of certification.
- Services for designing, implementing or maintaining a management system.

GLI Secure shall not participate in decision process of management system issues.

GLI Secure shall not participate in preparation and procurement of manuals, guides and procedures.

GLI Secure shall not provide specific and detailed advice, instructions or solutions towards the development and implementation of a management system subject to certification.

GLI Secure shall not provide training on design, implementation and maintenance of management systems subject to certification.

GLI Secure may arrange training as part of the Gap Analysis phase, provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information; i.e. the trainer shall not provide client-specific solutions.

Such information may include:

- explaining the meaning and intention of certification criteria;
- identifying improvement opportunities;
- explaining associated theories, methodologies, techniques or tools;
- sharing non-confidential information on related best practices;
- other management aspects that are not covered by the management system being audited.

**1.6.** In accordance with ISO/IEC 27006 IS 5.2, GLI Secure may carry out the following activities, not considered as consultancy and not resulting in a conflict of interest:

- a) provision of training courses / lectures, provided that, where these courses relate to information security management, related management systems or auditing, GLI Secure shall confine itself to the provision of

generic information and advice which is publicly available (i.e. GLI Secure shall not provide company-specific advice which contravenes point b) below;

- b) making available requested information describing GLI Secure's interpretation of the requirements of the certification audit standards;
- c) performing second and third-party audits according to standards or regulations other than those being part of the scope of accreditation;
- d) adding value during certification audits and surveillance visits (e.g. identifying opportunities for improvement, as they become evident during the audit, without recommending specific solutions).
- e) pre-audit activities, solely aimed at determining readiness for certification audit:  
such activities shall not:
  - result in the provision of recommendations / advice,
  - contravene point a) to d),
  - shall not be used to justify a reduction in the eventual certification audit duration.

**1.7.** GLI Secure shall not provide internal audits for its certified clients. GLI Secure shall not certify a management system for which it has conducted internal audits within two years following the end of the internal audits.

**1.8.** GLI Secure shall not provide certification services to a client when relations between a consultancy company and GLI Secure could lead to impartiality threat.

**1.9.** GLI Secure does not outsource audits to management system consultancy organizations. GLI Secure may use individuals contracted as auditors or technical experts.

GLI Secure does not, and has no plans to, subcontract work that falls under ISO 17021 accreditation. Should it become necessary, however, the following procedure shall apply:

- All external auditors and external experts are required to comply with the GLI Secure Audit Process and sign the GLI Secure Confidentiality and Impartiality Declaration.

**1.10.** GLI Secure shall not allow any consultancy organization to market or offer the activities of GLI Secure. GLI Secure shall not state or imply that certification would be simpler, easier, faster or less expensive if a specific consultancy organization were used.

**1.11.** Personnel (including those acting in a managerial capacity) who have provided consultancy (including internal audits) within two years to the organization seeking certification, are not allowed to take part in audit or other certification activities.

**1.12.** GLI Secure identifies, analyzes and documents all possibilities for conflict of interests that emerge from certification processes including any conflicts that emerge from its relations. Presence of relations does not necessarily position GLI Secure in a situation of conflict of interests.

When a potential impartiality threat arises GLI Secure eliminates it or decreases it.

It is necessary to cover all possible conflict of interests' sources that are identified regardless of their origin.

**1.13.** GLI Secure staff is fully committed to ensuring that all certification activities are impartial.

There shall be no pressure of any kind (financial, trade, administrative, moral or other) over GLI Secure and the personnel regarding the execution of their obligations as a Certification Body.

**1.14.** GLI Secure requires all employees, internal and external, to comply with impartiality policies.

It is the policy of GLI Secure to disqualify any representative from the responsibility of performing assessment or audit activity for any company in which the representative has a prior interest. This includes (but is not limited to):

- a vested interest in the assigned client,
- prior employment by the client in some capacity within the past two years,
- prior provision of consulting services to the client within the past two years.

## ASSOCIATED DOCUMENTS

- Confidentiality and Impartiality Declaration
- Impartiality Risk Management Policy
- Risks to Impartiality Evaluation Report

## Revision History

| Version | Change Description                                                                                                                                                                                                                                                                  | Date       |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| 1.0     | Initial Release                                                                                                                                                                                                                                                                     | 2021-02-04 |
| 1.1     | Modified document to reflect all MS audits. Also changed approvers to the new ISF committee as we integrate management of 17021 with the incoming 27001. Added clarity that within this document, GLI Secure references those staff members responsible for certification services. | 2021-12-15 |
| 1.2     | Refreshed documentation to reflect the new operating as name "GLI Secure".                                                                                                                                                                                                          | 2026-06-05 |