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A. Complaint handling Procedure:

Who can file complaint:	<ul style="list-style-type: none"> • Applicant/ Operators • Anonymous for ZENITH certification activity
Complaint Applicability:	<ul style="list-style-type: none"> • A complaint can be presented against any aspect of ZENITH' performance (inspection, certification, finances, administration, complaint against residue cases). • Only valid, related case will be subjected for investigation. Complainant must submit complaint / appeals with valid evidences. The substantiated case will be handled through appropriate actions which may include Non compliance with corrective and preventive actions as deemed fit. • If deems fit, ZENITH investigation may require and call for further information or particulars from the complainant and at its discretion, consider involving any other/additional Officer of the Company and/or Committee and/ or an outside agency for the purpose of investigation. The outcome will be notified accordingly through email. <p>Note : The complainant has the opportunity to refer their complaint to the Accreditation Bodies such as IOAS, USDA NOP, CFIA if the issue has not been resolved through the full implementation of ZENITH's own procedures, or if the complainant disagrees with the conclusions reached by ZENITH and/ or is dissatisfied by the way ZENITH handled the complaint.</p>
<u>Conditions when Compliant not acceptable, denied:</u>	<ul style="list-style-type: none"> • Unrelated, absence of evidence, absurd or misunderstanding case will not be entertained, complainant will be informed outcome of complaint closure with reason. When issues clearly fall outside the ZENITH accredited certification scheme or scope, the incoming communication is treated as correspondence and closed out with an appropriate response. • When a communication does not allege violations of NOP/EU/COR regulations, but raises standard and ZENITH certification requirement related questions that can be addressed by the ZENITH, a response, preferably by email, is provided. • When a communication does not allege violations, but raises policy issues or asks complex questions or ask Clarity on standard and certification procedures, it is referred to the Director or to the Competent Authority (As deemed fit). • If further information enquired during investigation process indicates that the alleged violation does not fall within the scope of NOP/EU/COR Regulations to which ZENITH offers certification, or where information in the complaint is inadequate to pursue further action, the case will be dismissed. If information is not provided within the deadline and no extension is requested, further adverse action criteria will be followed. • When a communication alleges violations, it is forwarded to a Director or impartiality Committee as directed by the Director for investigation.

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<p>Timeline:</p>	<p>Within 30 days of the receipt of a communication, or within the timeframe given by the Competent Authority or ACA</p>
<p>What information should I provide?</p>	<p>When you report an alleged violation, provide as much information as possible to help ensure a thorough investigation (see example below). The identities of complainants will be considered confidential and will be protected to the greatest extent permissible by law. Acceptable forms of filing complaint;</p> <ul style="list-style-type: none"> (i) Be in writing (ii) State that it is a complaint with subject area of complaint (must be within the scope of certification or service) (iii) Be submitted in English (iv) Be specific and include appropriate objective evidence to substantiate any claim of dissatisfaction with the ZENITH's certification activities and/or a Inspector; and (v) Complaints should be submitted by email to Cad@zenithcertifications.com <ul style="list-style-type: none"> • If the complaint is related to performance of a ZENITH staff, the case shall be handled by a different person. Also appeals/mediations are handled by a person who is different from the one who made the initial decision.
<p>Procedure:</p>	
<ol style="list-style-type: none"> 1. Submit Formal Complaint via website, Email with proper justification/ evidences. 2. Review of Incoming Correspondence, Check appropriateness and correct applicability, acknowledge. (Only acceptable cases leads to investigation, non applicable cases will be considered closed/ correspondence followed by result notification. 3. <u>Investigation which may include onsite inspection sampling and analysis</u> <ul style="list-style-type: none"> — Authorized responsible person (may be assist by designated staff) will be assigned for investigation of complaints. Conflict of interest and confidentiality taken care at each step — Investigation of complaints of noncompliance with the regulations can include unannounced inspections, sampling, or any other method intended to assess the veracity of the complaint. — Where contamination residues (such as agrichemicals) are found on or in certified products, further investigation and testing may be at the expense of the operator where it is shown that due diligence and conformance to the Standard has not been maintained by the operator or contracted parties to the operator. — If a noncompliance is confirmed, the noncompliance procedure for certified operations will be followed. The concerned authority and party will be notified of all compliance proceedings and actions taken pursuant to Adverse actions — When a complaint alleges violations by a ZENITH Certified Operator, it is retained for ZENITH investigation. Where multiple ACAs (accredited certification agencies) involved, concerned ACA will be approached for necessary investigation and coordination as applicable. These complaints are generally investigated within a target of 30 days or as per given timeframe by ACA or other authorities/bodies. 	

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- The ZENITH and ACA (As per case involvement of Certification Agency) investigates the complaint and reports its findings to Director along with supporting documentation. For the purpose of tracing the ingredients or production phases of an organic product, the ZENITH may ask information from the ACA or operators involved in the production and handling of those products falling under its supervision.
- Any non-compliances found will be addressed in order to ensure proper adverse action procedures are followed and the ZENITH can utilize Disciplinary measures and Adverse Actions when appropriate. Evaluate whether actions taken by ACAs are adequate to address the complaints.
- Determine whether further investigation by the ACAs or by ZENITH is warranted
- Additional follow-up activities may be conducted.
- All information gathered is analysed to establish facts that tend to prove or disapprove the alleged violations.
- The investigation is concluded with a Case Closure Memorandum. For cases involving the issuance of a Notice of Noncompliance, a written Report of Investigation (ROI) is drafted. The ROI outlines the allegations and the applicable statutes and regulations, organizes the findings and supporting evidence to allow for a logical conclusion, and recommends resolution options. Complaints with its outcome shall be notified to the competent Authority.
- **Case Closing Process:**
Case closing documents (outcome) will be sent to recipients by Postal Address (Mail) or Email as preference). All documents related to this process are retained for 5 years after the final action. Closing documents to include (as applicable):
 - Notice to Complainant of Case Closure
 - Notice to ACA – No Violations or Noncompliance detected at ACA Operator
 - Notice to Certified Operation – No Violations
 - **Notice to Certified Operation** – Noncompliance and applicable Disciplinary action. And notify its outcome to the relevant accreditation authority

<u>Submit Complaint to Accreditation authority against ZENITH certification activity and objectives of certification.</u>	COR Programme (accreditation authority- IOAS : quality@IOAS.org) or you may directly contact CFIA inspection.canada.ca https://inspection.canada.ca/en/food-labels/organic-products/file-complaint
	EU Programme (accreditation authority-IOAS) : quality@IOAS.org
	NOP Programme (accreditation authority-USDA NOP : NOPCompliance@ams.usda.gov)

B. Appeals Handling Procedure

1. EU & COR Program:

Applicability:	<ul style="list-style-type: none"> — Persons subject to the regulations who believe that they are adversely affected by a noncompliance decision of a ZENITH may appeal such decision to the ZENITH APPEAL Committee. — Written request must be sent to mail (Communication Address), or email. within 15
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	<p>days of receipt of the notification of the adverse action, or within the timeframe specified in the notification, whichever occurs later.</p> <ul style="list-style-type: none"> — Unless the appeal is timely, the decision to deny, revoke, or suspend your certification will become final. Appeals not filed within the allotted timeframe may be dismissed. — All appeals shall be reviewed, heard, and decided by persons not involved with the decision being appealed. <p>There is no conflict of interest, personnel (including those acting in a managerial capacity) who have provided consultancy for a client, or been employed by a client, shall not be used by ZENITH to review or approve the resolution of appeal for that client within two years following the end of the consultancy or employment. Investigation and decision on appeals shall not result in any discriminatory actions.</p>
<p>Appealable Adverse Actions</p>	<p>Examples of adverse actions that may be appealed include:</p> <ol style="list-style-type: none"> 1) Proposed suspension of certification 2) Proposed revocation of certification 3) Denial of certification 4) Combined notice of noncompliance and proposed suspension or revocation 5) Cease and desist notice 6) Denial of reinstatement.(NOP certified operation - File to NOP) 7) Civil Penalty Notice <p>This list is not exhaustive, and is subject to change</p>
<p>What to include in Appeal filing:</p>	<p>The appeal shall include minimum:</p> <ol style="list-style-type: none"> a) A copy of the notification of the adverse action, b) Specify the grounds on which the appeal is made; c) The reasons for believing the decision was not proper or made in accordance with EU regulations, policies, or procedures d) Be accompanied by relevant documented evidence; e) Indicate what steps were taken to resolve the issue prior to lodging the appeal.
<p>Impact of Certification status during appeal process;</p>	<ul style="list-style-type: none"> — A currently certified operation remains certified during the appeal process unless its certification is otherwise suspended or withdrawn or revoked. During the certified operation’s appeal process, ZENITH maintains its oversight of the operation. ZENITH may at any time issue additional adverse action for additional violation arise separate from appeal process which the operator may also appeal. — An already suspended or revoked operation remains suspended or revoked during the appeal process. (Examples of when this would occur: A suspended operation appeals a Denial of Reinstatement; a revoked operation appeals a Denial of Certification; a suspended or revoked operation appeals a Cease and Desist Notice; a Civil Penalty Notice.) — An uncertified operation, applicant for certification, remains uncertified during the appeal process.

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<p>Steps and Procedure:</p>	<ul style="list-style-type: none"> — Receive Appeal request, An applicant or certified operator may appeal a decision by ZENITH to deny, suspend, or cancel certification. The burden of proof to show adverse effect shall be on the Appellant. Records of appeals are maintained in an Appeals Log subject to further evaluation as deemed fit — Request review and Acknowledgement. — Ask additional information (if needed) Appellant will be notified of any missing required documentation if it did not accompany the appeal. The appellant may correct any procedural deficiencies before the filing period ends. — Appeal case review: Appeal panel reviews the substance of the case, writes a case summary, and recommends an appeal outcome to the ZENITH Director. The Director has the discretion to close the appeal without a formal Administrator’s Decision. The Director issues a decision either to sustain or deny the appeal. In the Directors absence, the other official from the Appeal panel delegated the acting authority to sign the Decision, may sustain or deny the appeal. — The Persons responsible for the decision being appealed against shall not be involved in the final decision on the appeal. The appeals committee has the following powers: <ul style="list-style-type: none"> ○ To deny and grant certification ○ To impose, modify and withdraw sanctions and conditions ○ To order for re-inspection — Possible Appeal outcomes: <ul style="list-style-type: none"> ○ Closure Letter: In certain cases, the ZENITH may close an appeal without a formal Administrator’s Decision. For example, if the issue has been fully resolved as a result of communication clarifications, if procedural errors have occurred, and/or and the certifier has acknowledged the operation’s full compliance, the appeal may be closed without a Decision. If an appeal is closed without a Decision, the ZENITH must withdraw the proposed adverse action, and the appeal becomes moot. The closure letter explains the reasons for closing the appeal and the implications of this outcome. ○ ZENITH Decision – Appeal Denied: The ZENITH may determine that it is more likely than not that the appellant violated the organic regulations. Consequently, the ZENITH signs a certification Decision denying the appeal (i.e., upholding the adverse action). The appellant is then provided an opportunity to request a hearing before ZENITH APPEAL PANEL. If the hearing is waived, then the ZENITH Decision is implemented. ○ ZENITH Appeal Panel Decision – Appeal Sustained: The ZENITH Appeal Panel may determine that it is more likely than not that the appellant’s arguments are correct. Consequently, the ZENITH signs a Decision upholding the appeal, and the adverse action is overturned and will be withdrawn. ZENITH may decide to order for re-inspection for reinspection and sampling at operators cost for substantial confirmation to the subject appealed.
<p>Time frame:</p>	<ul style="list-style-type: none"> — The closure timeframe is 90 days from the date of receipt of appeal

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2. NOP Programme:

Appeals to Notices of Proposed Suspension or Revocation or Denials of Certification are subject to the requirements of section **205.681** of the National Organic Standards.

A certified operation, an applicant for certification, an uncertified operation, a suspended certified organic operation who believe they are adversely affected by an adverse action may submit an appeal to the AMS Administrator in accordance with § 205.681.

Appellant may submit an appeal in writing to the **National Organic Program**. Appeals must be filed within the time period specified in the appropriate Notice, or within 30 days of receiving the adverse action letter, whichever is later. The appeal will be considered “filed” on the date received by the Administrator or by the State organic program.

When a person is subject to an approved State organic program, the appeal must be made to the applicable State organic program.

A copy of the USDA Instruction, *Adverse Action Appeal Process (NOP 4011)*, will be provided to applicants or certified operations in a notice of denial or notice of proposed suspension or revocation for necessary implementation of procedure.

The operator must include the following information in their appeal in writing (or electronic transmission):

1. a copy of the decision they are appealing and
2. a statement of their reasons for believing that the decision was not proper or made in accordance with applicable program regulations.

Based on NOP decision, If an appeal is sustained, the applicant will be issued organic certification, or a certified operation will continue its certification.

If an appeal is denied, a formal administrative proceeding will be initiated to deny, suspend, or revoke certification of the applicant or the certified operation.

All written communications between parties involved in appeal proceedings must be sent to the recipient’s place of business by a delivery service which provides dated return receipts.

Acceptance and Exchange of Information with other accredited Certifiers

- ZENITH accepts the certification decisions made by another certifying agents accredited or accepted by accreditation authority.
- ZENITH will exchange information with other certifying agents to ensure organic integrity or to enforce organic regulations, including to verify supply chain integrity, authenticate the organic status of certified products, and conduct investigations.
- The exchanged or shared information still retains its proprietary character even after it is exchanged and all of the certifying agents that are involved in the exchange still have a duty to preserve the confidentiality of that information after the exchange, per the confidentiality Policy.

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C. ZENITH Policy on Impartiality and Objectivity

Adherence to ISO 17065 Requirement and safeguarding Impartiality	<ul style="list-style-type: none">○ ZENITH safeguards the impartiality of certification activities, takes responsibility for its management and certification activities at all levels of the organization to ensure certification is handled in an objective and transparent manner. ZENITH monitors the risk to impartiality, takes preventive actions and takes appropriate measures to minimize or eliminate any risk to the impartiality of services offered to its operator.○ ZENITH have in place safeguards that mitigate or eliminate threats to auditor/any personnel impartiality. Safeguards mechanism include prohibitions, restrictions, disclosures, policies, procedures, practices, standards, rules, institutional arrangements, and environmental conditions. These are regularly reviewed to ensure their continuing applicability implemented in order.○ ZENITH ensures to adhere ISO 17065 requirements on impartiality.○ ZENITH is not involved in any sort of consultancy as defined in ISO 17065 i.e. "consultancy" as "participation in designing, manufacturing, installing, maintaining or distributing of○ Ensures appropriate and adequate structures and defined procedures. The mechanism and system operates without undue influence from vested interests.○ Allows significantly affected parties to participate in the development of its principles and policies, no single interest predominate, have balanced stakeholder representation.○ Ensure an equal treatment for all certified operators, employee, committee members○ Ensures impartial mechanism in place for all stage of certification steps and activities (Application screening process through final certification decision) based on an objective assessment of relevant factors. Certification activities do not affect the confidentiality, objectivity and impartiality of its certifications.○ For NOP: Ensures The individual who conducted the onsite inspection cannot conduct a final review of documents or make a certification decision for the operation they inspected for 12 months after the date of that inspection.○ Ensure that its responsibly connected persons (if any), employees, and sub contractors (Lab service), analysis, and decision-making responsibilities have sufficient expertise in organic production or handling techniques to successfully perform the duties assigned.○ Does not provide any service that could compromise the confidentiality, objectivity or impartiality of its certification process, unless the product/service and certification programs are clearly separated in a manner that ensures that such compromise cannot occur.○ certification decisions activity, process and personnel are free from any commercial, financial and other pressures that might influence decisions.○ Have mechanism in place for exclusive certification decision (Personnel conducted or assigned) for inspection shall not have any decision-making power in the respective certification decision. Persons responsible for a decision that is being appealed is devoid of appeal decision power.○ Conduct an annual performance evaluation of all persons who review applications for certification, perform on-site inspections, review certification documents, evaluate qualifications for certification, make recommendations concerning certification, or make certification decisions and implement measures to correct any deficiencies in certification services○ Supply information related to and limited to the certification only <p><u>Not engaged in;</u></p> <ul style="list-style-type: none">○ Marketing of certified products or promotion of individual products○ Not offering technical advice or helping or training to set up management systems of any operations, related organic operations, Group operations , correcting or advising on non
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conformities. Training on regulatory requirements, certification requirements and procedures and its updates allowed and recorded.

- Strictly prohibits acceptance of any gifts or financial offers from its client to avoid any conflict of interest. Retains authority of all certification decisions.
- Non compromising objectivity ensured in Fee structures and other issues related to payment, All payments accepted to ZENITH account only, No charges applied to Inspectors or personnel. Direct payment of inspection and certification services, in cash or to their private bank account
- No subcontracted or outsourced activity for certification decision, appeals, complaints.
- Have no relationships with companies who offer consultancy, internal audit services or other services that can be construed as having an impact on the certification services provided by ZENITH. Only allowed to inform regulatory and certification policy requirements. ZENITH will never certify operations for which internal audit service provided prior to accreditation, Cease this activity immediate after accreditation.
- ZENITH management personnel or personnel involved in the evaluation or certification process shall not be involved in activities of a separate legal entity offering or manufacturing the certified product (including products to be certified) or offering advice
- Certification fee applies, charged in disclosed and non- discriminatory manner.

Following principals have been established to ensure that impartiality is both maintained and can be demonstrated at certification and other related activities:

- Independent authorized and competent certification personnel, member of the management team, ensures that no interest shall predominate,
- Have mechanism in place to identify, evaluate, Potential conflict (real and perceived) and refrain with risk assessment prior to that relationship being formalized.

Potential conflict of interest prevented which may arise through or include but not limited to:

- Shall not offer any internal audit service, management system consultancy or any other form of conflict to companies or individuals pertaining to organic certification
- Shall not design, manufacture, install, distribute or maintain any organic certified products; does not (and has never) design, implement, operate or maintain any organic certified process; does not (and has never) design, implement, provide or maintain any certified organic services including setting up of Grower group management system and its documentation.
- Shall not have any interests & will not be linked with the activities of an organization (financially or otherwise)
- not accept any gifts or financial offers from its client to avoid any conflict of interest. ZENITH retains authority of all certification decisions.
- All employees, committee members including impartiality committee will be reviewed annually to ensure that they remain impartial when conducting audits, review and decision activity.
- Individuals employed by or otherwise contracted to shall declare their current and past 2 years relationships with all companies (12 month for NOP & COR). In case of real and perceived interest identified, shall be abstain from task for 12 month for NOP and COR and 24 month for EU programme
- Annual and periodic review mechanism for any threats to impartiality and will not use that individual in any capacity unless they can demonstrate that there is no conflict of interest. If any past relationship identified, the individual will (ZENITH PERSONNEL OR SUB_CONTRACTOR) not allowed to conduct a management system audit. Impartiality risk matrix developed, reviewed and updated annually (periodically as needed) at management review, internal audit. Impartial Committee also reviews and approves impartiality risk matrix with actions and

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outcomes on annual basis for system compliance based on all certification and activities/ relations exist if any which includes review of all personnel (including top management, impartiality committee members, other committee members), inspection and administrative review and certification personnel. Auditors shuffling tool ensures familiarity threat. The top management involvement (identifies if any which might make or influence the certification decisions) with any other related entity reviewed and monitored consistently, applies and implements abstainment from decision activity. The management personnel (top management, Quality, committee members) or personnel involved in the evaluation or certification process shall not be involved in activities of a separate legal entity offering or manufacturing the certified product of related organic sector (including products to be certified) or offering advice

- Application is open to all operations engaged in organic, sustainable, and related sector without regard for membership or any other extraneous factors, apply certification charges as per declared certification fee structure
- ZENITH maintains a record system that demonstrates the way in which each certification policy, procedure and criteria is applied. Review and evaluation activities are based on an objective assessment of relevant factors, following a comprehensive protocol. The inspection, review and decisions on certification truly based on the applicable requirements and have been applied in an impartial and consistent manner. Any conditions of certification including investigation outcome shall be monitored effectively and recorded in a transparent manner.
- To safeguard impartiality, ZENITH has established an Impartiality Committee (IC) for effective involvement of interested parties for safeguarding impartiality. ZENITH ensures a balanced representation of interested parties with no single party predominating.
- To safeguard impartiality, ZENITH has developed a procedure on management of risks to impartiality (Quality manual and its addendum document) and maintains an Impartiality Matrix to identify, analyse, monitor, and document the risks to impartiality arising from its activities including any conflicts arising from its relationships or from the relationships of its personnel. The process includes identification of and consultation with the said committee to advise on matters affecting impartiality. The compositional criteria, minimum quorum ensured consistently. The ZENITH Impartiality committee assess and review the ZENITH certification policy & procedures, certification decisions meet the relevant requirements and been applied in an impartial and consistent manner. Comments or feedback of impartiality committee have been taken into account. ZENITH policy and procedures includes provision for impartiality committee, ZENITH employees, committee members and other stakeholders (organic/ anonymous) to file complaint to the accreditation body against ZENITH certification service, decision found unsatisfactory or not compliant to the norms and regulations.
- ZENITH screens inspectors for any potential conflicts of interests that may conflict with the ability to provide operators an objective inspection. As a best practice, ZENITH prefers to rotate inspectors often to avoid over- familiarity. If the operator objects to the assignment of a particular inspector to evaluate their operation, ZENITH considers the request is sufficient to reassign the inspection. The operator may not choose or recommend a specific inspector.
- Certification services hasn't any interests & not linked with the financial or otherwise vested activities of an organization that provides management system consultancy. If it is known that any organization is making inappropriate claims regarding certification, then that organization will be informed for not doing this.
- Inspectors/ Verification Officer and others involved in the certification process shall not be put under any pressure (e.g. targets to increase clientele, any financial pressure etc.) and shall not be influenced in any way to come to a particular conclusion regarding the result of an audit.
- All members, personnel, committee members, top management personnel obliged to declare potential and perceived conflict of interest and maintain confidentiality which is subject to

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evaluation on annual basis and task assignments,

- Effectively respond to complaints and deal with them appropriately
- Handle confidential information from customers, while appropriate to balance the principle of openness and confidentiality in dealing with and responding to complaints
- Avoid, respectively. A ban on using methods of intimidation of any person participating in the testing, inspection and certification process

Normative text of adherence to ISO 17065 includes:

- 4.2.1 Certification decisions shall be undertaken impartially
- 4.2.2 The certification body shall be responsible for the impartiality of its certification activities and shall not allow commercial, financial or other pressures to compromise impartiality
- 4.2.3 The certification body shall identify risks to its impartiality on an ongoing basis. This shall include those risks that arise from its activities, from its relationships, or from the relationships of its personnel (see 4.2.12).

Risks to impartiality include bias that may arise from:

- **self-interest** (e.g. overdependence on a contract for service or the fees, or fear of losing the client or fear of becoming unemployed, to an extent that adversely affects impartiality in carrying out conformity assessment activities);
 - **self-review** (e.g. performing conformity assessment activity in which the certification body evaluates the results of other services it has already provided, such as consultancy);
 - **advocacy** (e.g. a certification body or its personnel acting in support of, or in opposition to, a given company, which is at the same time its client);
 - **over-familiarity**, i.e. risks that arise from a certification body or its personnel being overly familiar or too trusting instead of seeking evidence of conformity (in the product certification context, this risk is more difficult to manage because the need for personnel, with very specific expertise, often limits the availability of qualified personnel);
 - **intimidation** (e.g. the certification body or its personnel can be deterred from acting impartiality by risks from or fear of, a client or other interested party);
 - **competition** (e.g. between the client and a contracted person).
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- 4.2.4 If a risk to impartiality is identified, the certification body shall be able to demonstrate how it eliminates or minimizes such risk. This information shall be made available to the mechanism specified in 5.2
 - 4.2.5 The certification body shall have top management commitment to impartiality
 - 4.2.6 The certification body and any part of the same legal entity and entities under its organizational control (7.6.4) shall not a) be the designer, manufacturer, installer, distributor or maintainer of the certified product d) offer or provide consultancy (3.2) to its clients related to the certified products, services or processes e) offer or provide management system consultancy (3.3 or ISO/IEC 1702:2011) or internal auditing to its clients where the certification scheme requires the evaluation of the client's management system.
 - 4.2.7 The certification body shall ensure that activities of separate legal entities with which the certification body (...) has relationships do not compromise the impartiality of its certification activities.
 - 4.2.8 When the separate legal entity in 4.2.7 offers or produces the certified product (including products to be certified) or offers or provides consultancy (see 3.2), the certification body's management personnel and personnel in the review and certification decision-making process shall not be involved in the activities of the separate legal entity. The personnel of the separate legal entity shall not be involved in the management of the certification body, the review, or the certification decision.
 - 4.2.9 The certification body's activities shall not be marketed or offered as linked with the activities of an organization that provides consultancy (3.2). A certification body shall not state or imply that certification would be simpler, easier, faster or less expensive if a specified

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	<p>consultancy organization were used.</p> <ul style="list-style-type: none">○ 4.2.10 Within a period specified by the certification body, personnel shall not be used to review or make a certification decision for a product for which they have provided consultancy○ 4.2.11 The certification body shall take action to respond to any risks to its impartiality arising from the action of other persons, bodies or organizations of which it becomes aware○ 4.2.12 All certification body personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially
Related internal documents	<ul style="list-style-type: none">○ Impartiality Risk Matrix○ Quality and Procedure manual (Impartiality Policy & Impartiality Management and Mechanism for maintenance for impartiality, Confidentiality and Conflict of interest and its declaration forms, Certification Policies and Procedures)○ ZENITH Staff guidelines (Steps to Organic Certification , Inspector and Reviewer Guidelines)