

CERTIFICATION MANAGEMENT PROCEDURE XAIS-PTS LIMITED	ISSUE NO: 19 ISSUE DATE: 26.02.26 ISSUED BY: V Sermon
V1	Management of Impartiality

1. Scope

The top management of XAIS-PTS Limited (referred to as XAIS-PTS herein) understands the importance of impartiality when performing Management System certification and assessment activities.

XAIS-PTS manages potential conflict of interests and ensures the of its Management System certification activities.

XAIS-PTS has developed and implemented policies, procedures, and processes in compliance with the requirements of BS EN ISO/IEC 17021-1:2015 / BS EN ISO/IEC 17065:2012 / Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020, **MCHW SHW Clause 104.15 and 104.16 and MCHW GC 101 Section 12 and Section 13** to ensure that no conflicts of interest exist or are resolved so as not to adversely influence XAIS-PTS activities.

2. Related Documents

BS EN ISO/IEC 17021-1:2015

BS EN ISO/IEC 17065:2012

BS EN ISO 9001:2015

Risk Register

Contracts

Confidentiality Agreement

Guidelines on the UK designation Technical Assessment Bodies (TABs) under the Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020

MCHW SHW Clause 104.15 and 104.16

MCHW GC 101 Section 12 and Section 13

W8 Panel for Safeguarding Impartiality

W8 Register

XAIS-PTS identifies, analyses, and documents all possibilities for conflict of interests that may arise from certification / assessment activities / processes including any conflicts that arise from its relationships on an ongoing basis.

Relationships do not necessarily present XAIS-PTS with a conflict of interests. However, should any relationship create a threat to impartiality, XAIS-PTS shall document and eliminate or minimise any such threats and document any residual risk on its Risk Register. Any residual risk identified shall be reviewed periodically, at the Management Review to determine if it is within acceptable levels of risk. This information is presented to the Managing Director and the Management Team members.

3. General

XAIS-PTS operates as a unique legal entity under Co registration No 04374737. The Certification Department forms part of the XAIS-PTS Company and operates in line with the requirements as listed above and the company's operating requirements. Each Company owned by the Phenna Holdings Group operate independently in areas of infrastructure, industrials, compliance & certification and food & life sciences.

CERTIFICATION MANAGEMENT PROCEDURE XAIS-PTS LIMITED	ISSUE NO: 19 ISSUE DATE: 26.02.26 ISSUED BY: V Sermon
V1	Management of Impartiality

All members of XAIS-PTS shall act in an impartial manner (not biased or prejudiced towards any side or party, and able to give a fair opinion or decision) by means of their signature on the confidentiality agreement.

It is necessary to cover all potential sources of possible conflict of interests. Sources that are identified regardless of their origin. XAIS-PTS shall use this information as an input in identifying threats to impartiality raised by the activities of such personnel or by the organisation that employ them. Regular review by means of internal audit and risk review are carried out to ensure impartiality.

Personnel, internal or external shall not be used unless they demonstrate impartiality and that there is no conflict of interest.

XAIS-PTS will not undertake any action that threatens the impartiality and/or are potential conflict of interest.

XAIS-PTS employees, internal and external, shall comply with this procedure as well as reveal any situation known to them that may present themselves or XAIS-PTS with an impartiality issue or conflict of interests.

XAIS-PTS shall utilise an Impartial Technical Supervisory Panel who shall ensure impartiality is maintained throughout XAIS-PTS Certification / assessment activities; ref W8 Panel for Safeguarding Impartiality. Risk review also forms part of the annual Impartiality review.

XAIS-PTS Certification / UK Approved Body is deemed as a separate entity from XAIS-PTS Testing Services for its Laboratory testing accreditation to BS EN ISO/IEC 17025:2017 and therefore XAIS-PTS shall not be influenced by its decision for its certification activities and XAIS-PTS shall not certify any other section / activity of its own company or organisations that XAIS-PTS is a part of or a member. XAIS-PTS shall not offer or provide management system technical advice/consultancy or any other technical advice/consultancy in respect of BS EN ISO/IEC 17021-1:2015 / BS EN ISO/IEC 17065:2012 / Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020

To ensure there is no conflict of interests all internal and external personnel, who have provided technical advice, (including internal audits) within two years to the organisation seeking certification, are not permitted to take part in audit or other certification activities records shall be maintained in the personnel files or approved subcontractor file.

XAIS-PTS shall not provide internal audits for its certified clients. XAIS-PTS shall not certify a management system for which it has provided internal audits within two years following the end of the internal audits.

XAIS-PTS shall conduct a periodic risk assessment to ensure no threat to impartiality exists through self-interest which may arise from a person or body acting in their own interest (financial or other), self-review which may arise from a person or body reviewing their own auditing work or on a client to which they have offered previous consultancy activities, familiarity or trust which may arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence or by intimidation which may arise from a person or body having a perception of being coerced openly or secretly.

CERTIFICATION MANAGEMENT PROCEDURE XAIS-PTS LIMITED	ISSUE NO: 19 ISSUE DATE: 26.02.26 ISSUED BY: V Sermon
V1	Management of Impartiality

XAIS-PTS shall not certify a management system on which a client has received management system technical advice/consultancy or internal audits, where relationships between the Consultancy Company and XAIS-PTS could pose an unacceptable threat to impartiality of XAIS-PTS.

XAIS-PTS shall not outsource audits to a management system consultancy organisation as this poses an unacceptable threat to the impartiality XAIS-PTS. This does not apply to individuals contracted as auditors or technical experts.

XAIS-PTS does not receive any financial support different from the invested in it and the fees of its services.

XAIS-PTS does not pay any commissions to consultants therefore there can be no pressure exercised on XAIS-PTS by consultants.

Where a relationship exists between XAIS-PTS and any separate legal entities, XAIS-PTS shall ensure that the activities of the separate legal entities do not compromise the impartiality of its certification activities.

Where the separate legal entity identified above offers or produces the certified product (including products to be certified) or offers or provides consultancy XAIS-PTS'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 XAIS-PTS the review or the certification decision.

XAIS-PTS or any part of the same legal entity and any entity under the organisational control of XAIS-PTS shall not be marketed or offered as linked with an organisation that provides management consultancy.

XAIS-PTS shall take corrective actions against inappropriate claims of any consultancy organisation stating or implying that the certification will be simpler, easier, faster or less expensive if specific certification body is used due to the fact it is conflict of interests. Also, XAIS-PTS shall not state or imply that certification would be simpler, easier, faster, or cheaper if a specified consultancy organisation were used.

XAIS-PTS shall take action to respond to any threats to its impartiality arising from the actions of other persons, bodies, or organisations.

XAIS-PTS shall act impartially and shall not allow commercial, financial, or other pressures to compromise impartiality.

XAIS-PTS shall not become directly involved in the design, manufacture, supply, installation, use or maintenance of the items inspected or similar competitive items.

XAIS-PTS will not allow any pressure from other certification bodies, clients and /or consultancy organisations to influence the certification process in the organization. If another certification body declines to provide service for client and the client requests the same service from XAIS-PTS then XAIS-PTS will investigate the reasons and advise how the investigation was carried out before

CERTIFICATION MANAGEMENT PROCEDURE XAIS-PTS LIMITED	ISSUE NO: 19 ISSUE DATE: 26.02.26 ISSUED BY: V Sermon
V1	Management of Impartiality

performing certification services and declining certification activities for the respective client. In all cases XAIS-PTS shall not allow any pressure from partners and others.

If there is such pressure, then XAIS-PTS will apply requirements of BS EN ISO/IEC 17021-1:2015 / BS EN ISO/IEC 17065:2012 / Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020 / MCHW SHW / standards / documents / normative references and internal procedures to stop such practice.

XAIS-PTS Shall not certify another certification body for its quality management system.

All interested parties shall have access to the services of XAIS-PTS and there shall not be undue financial or other conditions, all procedures shall be administered in a non-discriminatory manner.

XAIS-PTS will accept no pressure of any kind (financial, trade, administrative, moral or other) to compromise its certification activities and through its business strategy, XAIS-PTS shall evaluate its finances and sources of income from onset and on an ongoing basis which will ensure that XAIS-PTS has adequate arrangements (insurance and reserves) to cover liabilities arising from its operations in the areas which it operates.

All employees are obliged to work in compliance with requirements of BS EN ISO/IEC 17021-1:2015 / BS EN ISO/IEC 17065:2012 / Construction Products Regulation 2011 (retained EU law EUR 305/2011) as amended by the Construction Products (Amendment etc.) (EU Exit) Regulations 2019 and the Construction Products (Amendment etc.) (EU Exit) Regulations 2020 / MCHW SHW and as per agreement of contract.

Top management of XAIS-PTS is committed to full compliance with this declaration.

This Procedure should be read in conjunction with Process W8 Panel for Safeguarding Impartiality.