

1.0 Scope

This procedure outlines BLISS CB LLC good faith effort to identify and manage the threats to impartiality applicable to the ISO 9001 and ISO 14001 certification services provided by BLISS CB LLC.

2.0 Procedure

2.1 In accordance with ISO 17021 requirement 5.2.4, BLISS CB prohibits certification of another certification body.

2.2 Other threats to Impartiality include the following: (note- the threats listed below under 2.2.1-2.2.4 have been copied from *ISO 17021:2015 section 4.2.4*):

2.2.1 *Self-Interest: threats that arise from a person or body acting in their own self-interest. A concern related to certification, as a threat to impartiality, is financial self-interest.*

2.2.1.1 Self Interest Mitigating action: BLISS CB LLC maintains a mix of two types of subcontract auditors: a. full time management system subcontract auditors, and b. part time management system subcontract auditors who enjoy full-time employment in capacity other than contract auditing, such as engineering manager, quality manager, management system consultant, etc. (see 2.2.2 for mitigating actions related to consultancy self-review threats) of firms in various industrial sectors.

2.2.1.1.1 In regard to full time auditors contracted with BLISS CB, their auditing contracts are spread across multiple certification bodies, which allows them to avoid over-reliance on any particular client or certification body.

2.2.1.1.2 In regard to our use of part time auditors, these contractors enjoy full time employment and receive an income independent of BLISS CB LLC audit payments

2.2.1.2 Self Interest Mitigating action: It is recognized and understandable that a key metric of privately held companies is the amount of income or revenue generated. BLISS CB LLC functions as a for-profit entity and as such includes a Performance Dashboard metric that promotes the achievement of sales-related targets. However, to protect against overly aggressive sales practices, individuals who are under contract or who are assigned marketing/sales agreements to provide sales support to BLISS CB LLC are prohibited from performing any tasks related to the certification services, for example from the auditor selection to the final technical review decision.

2.2.1.3 Self Interest Mitigating action: Individual client representing a large portion of BLISS CB's source of income has the potential for the Client to apply pressure that can lead to decisions that violate BLISS CB impartiality policies. This situation is most likely to occur during the initial start-up phase when BLISS CB is building its client base. To mitigate any "oversized" influence from a single large client, BLISS CB maintains cash operating reserve of \$20,000, and

monitors client sales and income sources at quarterly operations review meetings.

2.2.2 *Self-Review: threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat.*

2.2.2.1 Mitigating action: BLISS CB LLC is strictly prohibited from providing consultancy services, or using a management system consultancy to perform certification audits. However, we do maintain relationships with consulting organizations and independent consultants. Consultants or organizations that provide management system consultancy, including internal audit or supply chain audit services, for a BLISS CB certification client, are prohibited from performing any tasks related to the certification services for that client for a minimum of two years after the consulting relationship has ended.

2.2.2.2 Mitigation action: BLISS CB cannot independently or jointly promote, market, or sell certification audits with a management system consultancy or management system consultant in a way that suggests coordination, cooperation or partnership between BLISS CB and the consultancy. BLISS CB personnel or representatives must never state or imply that certification would be simpler, easier, faster or less expensive if a specified consultancy organization or consultant was used.

2.2.2.3 Mitigating action: Each Initial Audit report, recertification audit report, and surveillance audit reports are reviewed and evaluated by an independent Technical Reviewer. Auditors who performed the audit may not perform the Technical Review. In addition, the person(s) making certification decisions must be employee of BLISS CB and also cannot have participated in the Audit. As such, Technical Reviewers who are contractors, and not employees of BLISS CB, are not permitted to make any certification decisions.

2.2.2.4 Mitigation action: While BLISS CB LLC offers internal audit and supply chain audit services, BLISS CB LLC certification audit procedure for maintaining impartiality does not permit us to provide internal auditing and/or supply chain auditing services to a BLISS CB LLC certified client, nor can we provide Certification Audit services to any organization for a minimum of two years after providing Internal Audit and/or Supply Chain Audit services.

2.2.2.5 Mitigation action: The BLISS CB Audit Report, section XV Absence of Conflict of Interest & Confidentiality Statement of Agreement requires acknowledgement from the BLISS CB auditor that he/she has not provided consulting services to the auditee within a period of two years.

2.2.2.6 Mitigation Action: The Contract Auditor Agreement section 'Absence of Conflict of Interest' contains language that prohibits the Auditor from undertaking any auditing services for clients where they have

provided consulting or other services in the 24 months preceding the audit.

2.2.3 *Familiarity (or trust): threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.*

2.2.3.1 Mitigating action: BLISS CB LLC Technical Review process requires that objective evidence be supplied by the auditor within the audit report to adequately support the findings or the conclusions of the audit.

2.2.3.2 Mitigating action: BLISS CB LLC audit planning requirements stipulate that an auditor may not audit the same company more than six consecutive years without a witness audit performed at that site. If a witness audit is not performed within the six-year time period, then a new auditor must be inserted into the audit cycle for a minimum duration of one audit.

2.2.3.3 Mitigation action: While BLISS CB LLC offers public training courses and internal auditing services, BLISS CB is not permitted to provide internal auditing or training services to a BLISS CB LLC certified client. And, per 2.1.2.3 above, nor can we provide Certification Audit services to any organization for a minimum of two years after providing Internal Audit and/or Supply Chain Audit services.

2.2.4 *Intimidation: threats that arise from a person or body having perception of being coerced openly or secretly, such as a threat to be replaced or reported to a Supervisor.*

2.2.4.1 Mitigating action: Under no circumstances are threats or intimidation tactics acceptable by either BLISS CB or an BLISS CB client, or other interested party. BLISS CB maintains a close relationship with it's group of auditors, and prides itself of continual communication and open exchange of information. Should any circumstances arise that an auditor or staff member feels intimidated or threatened relative to a certification process activity or outcome, the staff member or auditor is encouraged to report immediately. To the extent possible, the auditor or staff member will be reassigned to a new position or client, and the intimidation threat will be presented to the Impartiality Committee for review.

2.3 Liability & Financing

2.3.1 To mitigate bias and threats to maintaining impartiality during certification activities that may arise due to financial stress or burden to remain business solvent, BLISS CB has adopted the following policies to deter such financial risks:

2.3.1.1 Liability management

2.3.1.1.1 As part of an annual risk evaluation process, BLISS CB President will identify potential liabilities arising from its certification activities. These may include client disputes, legal claims, or operational risks.

2.3.1.1.2 Based on the risk assessment, the President will maintain adequate commercial and professional liability insurance coverage. The insurance policy shall be

- reviewed annually to ensure it covers all identified risks associated with certification activities.
- 2.3.1.1.3 BLISS CB legal agreements with clients includes terms outlining the limits of liability for certification services.
 - 2.3.1.1.4 BLISS CB maintains Commercial General Liability and Professional service insurance coverage up to \$2,000,000.
- 2.3.1.2 Financial stability
- 2.3.1.2.1 BLISS CB reviews annually, during business planning process, and quarterly during Operations meetings, the financial tracking document 'Yearly Revenue Expense Projections sheet', which is used to ensure adequate budgeting and reserves to prevent potential financial strains caused by mismanagement of resources. To mitigate any temptation to base certification decisions on a need for revenue, BLISS CB maintains: 1) an annual minimum 3% gross revenue contribution to "emergency reserve" fund each year, which is monitored quarterly, and can be increased; 2) maintains a minimum cash reserve of \$20,000 for emergency purposes.
- 2.4 Communication and awareness of the importance of impartiality to auditors and staff.
- 2.4.1.1 This impartiality procedure is included as part of initial and recurring training for all auditors and BLISS CB LLC staff members.
 - 2.4.1.2 Acknowledgement and understanding of this procedure is required by written signature in the BLISS CB Training Guide.
- 2.5 Impartiality Committee
- 2.5.1 The impartiality committee consists of a minimum of one BLISS CB LLC management member, and two persons represented by Interested Parties of BLISS CB LLC. Interested parties are identified in the BLISS CB LLC Quality manual.
 - 2.5.2 The selection of the committee will make sure that the representation is balanced such that no single interest predominates.
 - 2.5.3 Committee meetings are held annually.
 - 2.5.4 Committee meetings are guided by the IC Meeting Agenda.
 - 2.5.5 The meeting goal is to identify and control any new potential or actual threats and risks to impartiality, or improve the existing controls described above to mitigate threats to impartiality.
 - 2.5.5.1 A secondary function of the Impartiality Committee is to review all Client Appeals, as described in the Client Appeals procedure.
 - 2.5.5.2 To facilitate this process, as instructed within the IC Meeting Agenda, Committee members are issued this procedure, along with applicable Accreditation requirements and context and importance of maintaining real and perceived impartiality in the management certification industry. In addition, the committee members are provided a copy of the BLISS CB LLC Quality Manual, audit history, current auditor and staff roster, select audit reports and technical review outcomes, and other relevant information as requested by

Committee members. The IC Meeting Agenda includes a Risk Assessment Matrix tool to assign numerical risk values for likelihood and severity of various risks and threats to impartiality, and identifies the current controls to mitigate the risk.

- 2.5.6 The Impartiality Committee meeting is chaired by the BLISS CB LLC President.
 - 2.5.6.1 All three members of the IC must be present to convene the IC meeting.
 - 2.5.6.2 Results of the Impartiality Committee meeting are relayed by the President at the QMS annual review meeting, and, as applicable, any actions arising from the Impartiality Committee meeting are entered and tracked within the IC Meeting Minutes Action Log.

2.6 Personnel

- 2.6.1 BLISS CB document the competence and responsibilities of an Impartiality Committee member in BLISS CB Job Description document.
- 2.6.2 BLISS CB will assure the IC has access to all information requested to fulfill its functions.
- 2.6.3 The committee will understand that if BLISS CB management does not respect its advice it shall have the right to go to the Accreditation Body directly or informing the appropriate authorities or stakeholders.
- 2.6.4 The IC members are required to sign a Confidentiality and Absence of Conflicts of Interest agreement.
- 2.6.5 IC members may serve on the IC for a maximum period of 5 years, after which time the IC member must recuse from the IC for two years before becoming eligible to rejoin IC meetings.

2.7 External representatives

- 2.7.1 When BLISS CB uses marketing and promotion services, or other tasks supporting BLISS CB 3rd party certification services, those individuals will be requested to sign a Confidentiality and Absence of Conflict of Interest Agreement to ensure their services are impartial and confidential.

3.0 Relevant Documents

- 3.1 Impartiality Committee meeting agenda and minutes
- 3.2 Outsourcing Certification Activities" procedure

4.0 Revision History

Revision No.	Date	Approved by	Comments
1	Jan 1, 2024	TI	Initial release
2	October 1, 2025	TI	1. Added Outsourcing Certification Activities" procedure as reference document 2. Added statement that BLISS CB does not certify another certification body.

			<ol style="list-style-type: none">3. Added Liability and Financing section4. Added risk and mitigation for individual client representing a large portion of BLISS CB's source of income
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