



GENERAL PROVISIONS

Bulletproof's Certification Body (hereafter referred to as Bulletproof) 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 Bulletproof, 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. Bulletproof understands and is fully aware of the importance of management of impartiality in carrying out its certification activities.

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

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

It is the policy of Bulletproof 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 Bulletproof or individuals employed by Bulletproof with other organizations or individuals will be declared, reviewed, documented and risk assessed.

1.2. Bulletproof 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. Bulletproof 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. Bulletproof 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 Bulletproof 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. Bulletproof 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 Bulletproof in a situation of conflict of interests. If some relations create impartiality threats, Bulletproof documents and eliminates or mitigates such threats.

Bulletproof 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.

Bulletproof 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.

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

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

Bulletproof 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. Bulletproof shall not certify another certification body for its activities related to its quality management system.

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

- Certification services on behalf of other certification bodies

1.5. Bulletproof 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.

Bulletproof shall not participate in decision process of management system issues.

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

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

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

Bulletproof 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, Bulletproof 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, Bulletproof shall confine itself to the provision of



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

- b) making available requested information describing Bulletproof'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. Bulletproof shall not provide internal audits for its certified clients. Bulletproof 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. Bulletproof shall not provide certification services to a client when relations between a consultancy company and Bulletproof could lead to impartiality threat.

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

Bulletproof 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 Bulletproof Audit Process and sign the Bulletproof Confidentiality and Impartiality Declaration.

1.10. Bulletproof shall not allow any consultancy organization to market or offer the activities of Bulletproof. Bulletproof 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. Bulletproof 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 Bulletproof in a situation of conflict of interests.

When a potential impartiality threat arises Bulletproof 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. Bulletproof 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 Bulletproof and the personnel regarding the execution of their obligations as a Certification Body.



1.14. Bulletproof requires all employees, internal and external, to comply with impartiality policies.

It is the policy of Bulletproof 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, Bulletproof references those staff members responsible for certification services.	2021-12-15