

Document Name: Impartiality Procedure
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Compiler: Mr. Tshepo Phakathi
Approved by: Mr. Tshepo Phakathi
Confidentiality: Empoweryst.
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1. Scope

1.1 This procedure covers aspects related to the maintenance of impartiality during verification activities and ensuring that there's objectivity, both perceptive and actual, in all processes.

2. Purpose

2.1 The purpose of this procedure is to ensure that the policy objectives set out in **E – PS 02/2** and **E – PS 11/2** are achieved.

3. Responsibility and Authority

3.1 The CEO is responsible for the assessment of impartiality and development of procedures that are necessary for the maintenance of such impartiality.

3.2 The Verifications Manager is responsible for implementing the impartiality procedure and is responsible for the invigilation of verification activities such that impartiality is protected.

3.3 All staff, external analysts and experts are responsible for ensuring strict adherence to this procedure.

4 References

4.1 Document Control Policy Statement **E – PS 02/2**

4.2 Impartiality Policy Statement **E – PS 11/2**

4.3 SANAS **R47-02**

5 Procedure

5.1 No verifications shall be performed prior to completion of an assessment of impartiality.

5.2 All employees are required to provide details of financial interest outside the company or known and suspected impartiality threats prior to participating in verification activities. The Verifications Manager, must declare any equity interest currently or previously held and must also declare known equity interest held by close family relatives.

5.3 All employees and service providers (including the Verifications Manager), employed to perform verification or verification related services, must sign an impartiality oath and agree to refrain from providing consultancy services as part of their employment contracts and in line with Consultancy Policy Statement **E – PS 19/2**.

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- 5.4 Upon receipt of Request for Verification, the Verification Manager shall perform a review or risk assessment using Review Assessment Form **E – ID 05**, that encompasses an assessment of impartiality, conflicts of interest and competence based on the following;
- 5.4.1 Adequate capacity with comprehensive sets of skills, experience and/or education to competently perform verification activities for the specific measured entity.
 - 5.4.2 Existing relationships between measured entity and employees (or immediate family), service providers and major shareholders.
 - 5.4.3 Existing client of consulting division where relationships are inactive (meaning that the last day of provision of consulting services was less than 24 months prior to request for Verification).
- 5.5 After the assessment, the Verifications Manager shall provide the measured entity with a Rating plan, which shall include the names and profiles of the verification analyst(s). These analyst(s) will be chosen based on their validated competence, objectivity and suitability. The Verification Manager must retain all decision-making powers regarding upholding or declining the recommended score, provided by analysts, based on the presented evidence.
- 5.6 Where the Verifications Manager differs substantially (more than 3 points) with analyst(s)' recommendations, then the Verification decisions must be elevated to the CAD committee. The CAD committee must assess the cause of this difference and take effective actions to address the cause.
- 5.7 Where the Verifications Manager elects to decline the request for verification, a letter with reasons must be sent to the measured entity and a copy provided to the CAD committee. The records collected during this assessment process must then be treated in accordance with Control of Records Procedure **E – OP 07**.
- 5.8 Any duress, incitement or gratuity offered by or related to the measured entity, with the intention of subverting impartiality, must immediately be reported directly to the CAD committee for further action. This can be done anonymously by anyone through any form of communication and is the responsibility of the CEO to solicit.
- 5.9 Where impartiality is compromised or identified during the course of verification activities, the verifications manager shall evaluate the nature of the cause or threat and make submissions to the CAD committee, which shall decide on risk mitigation methods or to abort the verification altogether based on the submissions of the Verifications Manager.
- 5.10 The Verifications Manager must ensure that a statement of impartiality encapsulating the contents of the policy statement **E – PS 11** and the procedure on Complaints Appeals and Disputes are available on the company's website www.empoweryst.co.za and handed over to Measured Entities upon signature of **E – LD 01**.

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5.11 The Verifications Manager must refer to the “consulted with” list, which will be provided to him/her on a monthly basis by the consulting division, prior to accepting any verification assignment. Under no circumstance shall a client on this list be verified, regardless of how much time has elapsed. The CEO will be responsible for ensuring that this instruction is observed through the Monthly System Audits that he will be conducting, this he can do by comparing lists of verified entities against the list of “consulted with” entities. The CEO is responsible for taking corrective action when this instruction is transgressed.

6 Records

6.1 E – ID 05/2 Review Assessment Form

- 6.1.1 Valid indefinitely
- 6.1.2 Controlled by the Verifications Manager
- 6.1.3 Updated periodically on Management Review or Internal Audit