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GAS.G-03:2025

Policy on Impartiality and Conflict of Interest

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0. FOREWORD

This Policy establishes the ethical principles, duties, and requirements that experts, assessors, technical experts, commission members, and GAS personnel must adhere to while performing their functions in accreditation processes.

The Policy is part of the GAS management system and aims to ensure confidence in accreditation results, maintain international recognition, and prevent conflicts of interest, undue influence, and corruption.

1. PURPOSE AND SCOPE

1.1 Purpose of this Policy:

- to ensure a high level of trust in the activities of GAS and the bodies accredited by it;
- to establish unified ethical standards and requirements for integrity and impartiality;
- to create mechanisms for preventing conflicts of interest and protecting the reputation of GAS.

1.2 This Policy applies to:

- GAS assessors and technical experts;
- members of the Accreditation Commission;
- GAS administrative and managerial personnel;
- any other persons performing functions on behalf of GAS or having access to confidential information.

1.3 Compliance with this Policy is a mandatory condition for cooperation with GAS. Violation of its provisions may result in:

- termination of the person’s involvement in accreditation activities;
- application of disciplinary or legal measures;
- notification of the relevant national or international authorities.

2. NORMATIVE AND REFERENCE DOCUMENTS

This Policy is based on the requirements and principles of the following normative documents:

2.1 International Standards:

- **ISO/IEC 17021-1:2023** Conformity assessment — Requirements for bodies providing audit and certification of management systems — Part 1: Requirements.

2.2 Internal GAS Documents:

- **GAS.G-01:2025** — Code of Ethics for Experts, Assessors, and GAS Personnel.

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3. TERMS AND DEFINITIONS

The following terms are used in this Policy:

GAS (Global Accreditation System) — an international accreditation system that establishes requirements, policies, procedures, and recognition mechanisms for conformity assessment bodies.

GAS Accreditation — official recognition of the competence of a conformity assessment body (certification body, laboratory, etc.), confirmed by compliance with established criteria, authorizing it to operate within a defined scope.

Conflict of Interest — any situation in which the personal, financial, or professional interests of a person involved in the accreditation process may influence, or appear to influence, their objectivity and impartiality. A conflict of interest also arises when an assessor, expert, or Commission member is an employee, contractor, or otherwise affiliated with a conformity assessment body, laboratory, or their group of companies that engages in competing activities with the body being assessed.

Affiliation through Employer/Contractor Relationship — a situation where a person has been (within the past 24 months) or plans to be (within the next 12 months) in an employment, contractual, or partnership relationship with a body that is a competitor of the body under assessment.

Impartiality — a principle of operation that requires decisions to be made solely based on objective evidence, free from external or internal influence.

GAS Expert — an individual authorized by GAS to participate in the accreditation assessment of conformity assessment bodies (certification bodies, laboratories, etc.) through witness observations, document reviews, and interviews, in order to provide a technical evaluation of the body's performance for use in accreditation decision-making.

GAS Assessor — an individual appointed by GAS to conduct assessments of conformity assessment bodies or to make accreditation decisions based on expert findings and established criteria.

GAS Personnel — employees, experts, assessors, commission members, and other individuals involved in accreditation processes or decision-making on behalf of GAS.

Independence — a state in which a person has no direct or indirect relationships with the assessed party that could influence their professional judgment.

Interest (personal or financial) — any benefit, tangible or intangible, that a person may gain as a result of an accreditation decision or outcome.

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4. PRINCIPLES OF IMPARTIALITY AND CONFLICT OF INTEREST MANAGEMENT

4.1 Fundamental requirement of impartiality

Accreditation is carried out solely on the basis of objective evidence of the competence of a conformity assessment body. No external factors (commercial, political, or personal) may influence decision-making. Impartiality implies the absence not only of personal interest but also of organizational dependence or competitive interests of the employer/contractor of the involved person.

4.2 Preventive approach to conflict of interest

The GAS Accreditation Agency implements mechanisms for identifying, analyzing, eliminating, and monitoring the risks of conflicts of interest (both personal and organizational) at all stages of accreditation. Any person who has an actual or potential conflict of interest shall not be allowed to perform tasks.

4.3 Independence of personnel and governing bodies

Assessors, technical experts, members of the Accreditation Commission, and GAS administrative staff must be independent both from the conformity assessment bodies undergoing accreditation and from organizations performing similar (competing) activities.

Independence includes two levels:

- Personal independence – the absence of financial, family, employment, or other private interests that may influence decision-making;
- Organizational independence – the absence of participation in the activities of other bodies or laboratories performing similar or competing activities within the same accreditation scope, or that may obtain direct or indirect benefit from the evaluation outcome.

A person shall not take part in accreditation processes if:

- they are an employee, consultant, or contractor of the assessed body or its direct competitor;
- their employer, parent, or subsidiary organization has a commercial interest in the assessment results;
- any other factor exists that could call into question their independence and impartiality.

Before participating in the accreditation process, each person must submit a Declaration of Independence and Conflict of Interest.

4.4 Exclusion of commercial influence

The number of clients, financial income, or potential benefits shall not influence GAS activities. The accreditation policy is applied equally to all bodies, regardless of their size, scope, or status.

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4.5 Transparency and traceability of processes

Accreditation and assessment procedures are documented, reproducible, and verifiable. All decisions must be evidence-based and recorded in the centralized registration system.

4.6 Ethical responsibility and integrity

Persons representing GAS must adhere to standards of professional conduct and avoid any manifestations of corruption, abuse of authority, or discrimination on any grounds.

4.7 Prohibition of consulting

GAS personnel, assessors, experts, or engaged consultants are prohibited from:

- providing consulting services to the bodies they assess;
- recommending third-party consultants or promoting their services;
- using accreditation as a means of commercial influence.

Any prior provision of consulting services must be declared, and such a person shall be automatically excluded from the assessment of the respective body.

4.8 Rights of interested parties

The GAS Accreditation Agency ensures that no body or laboratory is exposed to the risk of an unfair assessment conducted by its direct competitor.

5. MECHANISMS FOR CONFLICT-OF-INTEREST MANAGEMENT AND ENSURING IMPARTIALITY

5.1 Identification of conflict of interest

The GAS Accreditation Agency applies a systematic approach to identifying potential and actual conflicts of interest by means of:

- preliminary analysis of the activities of the conformity assessment body under evaluation;
- verification of the history of interaction between GAS personnel and the assessed body;
- mandatory declaration of conflicts of interest by all assessors, experts, and members of accreditation bodies prior to each assessment.

5.2 Prevention of participation by interested persons

If a personal or organizational conflict of interest is identified in any GAS representative (including involvement with a body or laboratory engaged in similar or competing activities within the accreditation scope), such person shall:

- be excluded from participation in the accreditation process of the respective body;
- transfer the case to another authorized specialist;

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- record the self-withdrawal in the appropriate log.

5.3 Declaration of independence

Before the commencement of each accreditation process:

- assessors and experts shall sign a Declaration of Impartiality;
- members of the Accreditation Commission shall confirm the absence of conflicts of interest prior to voting;
- administrative personnel shall confirm that no influence has affected the formation of the evidence base.

5.4 GAS Impartiality Committee

To ensure compliance with this document, **a GAS Impartiality Committee** is established, which:

- reviews potential cases of conflict of interest;
- conducts risk analysis related to commercial or administrative decisions;
- has the authority to block or suspend the accreditation process until the conflict is resolved.

5.5 Documentation and traceability

The GAS Accreditation Agency ensures:

- maintenance of a register of declared conflicts of interest;
- recording of all cases of personnel withdrawal from participation;
- maintenance of minutes of decisions made by the Impartiality Committee.

5.6 Actions in case of detected violation

If participation of a person with a conflict of interest in an accreditation process is established:

- the accreditation decision shall be reviewed;
- the expert or assessor shall be subject to disciplinary measures;
- the Ethics Committee may initiate the revocation of the GAS expert status.

5.7 Commercial independence and prohibition of financial influence

GAS guarantees that no financial, commercial, or administrative interests affect the process of accreditation decision-making.

Assessors, experts, members of the Accreditation Commission, and administrative staff shall:

- not accept gifts, financial rewards, bonuses, discounts, or any benefits from bodies undergoing accreditation or surveillance;
- not enter into financial relationships with an assessed body within 24 months before or after participation in its evaluation;

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- not participate in the activities of certification bodies or laboratories if their decisions may affect their own financial gain.

The GAS Accreditation Agency shall:

- maintain a mechanism for declaring financial interests;
- have the right to suspend a person if signs of financial influence or dependence are identified;
- document and analyze risks of commercial influence during each accreditation cycle.

Persons (assessors or technical experts) who are employees of or affiliated with organizations engaged in activities competing with those of the assessed body (or laboratory) shall not be permitted to participate in the accreditation process, regardless of the existence or absence of direct financial relationships.

Any attempt to exert influence through financial motivation shall be treated as a gross violation of this document and shall entail disciplinary measures, including revocation of the status of GAS expert or assessor.

6. PROCEDURES FOR CONTROL, RESPONSE, AND DISCIPLINARY MEASURES

This section regulates control and response procedures exclusively concerning the assurance of impartiality and the avoidance of conflicts of interest. All general ethical matters, as well as disciplinary sanctions that extend beyond the scope of this Policy, are governed by the GAS Code of Ethics (GAS.G-01).

6.1 Continuous monitoring of policy compliance

The GAS Accreditation Agency ensures systematic and ongoing monitoring of compliance with the requirements through:

- analysis of independence declarations;
- internal reviews of assessors' and experts' performance;
- observation during witness assessments;
- evaluation of Accreditation Commission decisions for impartiality;
- analysis of feedback received from conformity assessment bodies.

The purpose of monitoring is to identify and prevent conflict of interest risks before they may influence accreditation decisions.

6.2 Obligation to report

Each assessor, expert, Commission member, and GAS employee shall immediately report any confirmed or potential conflict of interest, violation of impartiality principles, or attempt to influence accreditation results.

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Reports shall be submitted through established channels in accordance with GAS.G-01 “Code of Ethics.”

6.3 Procedure for handling reports

- Reports are reviewed by the Impartiality Committee or an authorized person.
- If necessary, an internal review procedure is carried out as defined in the Code of Ethics.
- All actions are documented to ensure traceability.

6.4 Response to violations

If a violation of impartiality principles or a conflict of interest is confirmed, disciplinary measures are applied in accordance with GAS.G-01 “Code of Ethics,” including:

1. personnel restrictions (self-withdrawal, suspension);
2. temporary or permanent revocation of status;
3. referral of information to relevant authorities in case of legal violations.

6.5 Personal responsibility

- By signing this Policy, each individual acknowledges personal responsibility for adhering to the principles of impartiality and conflict of interest avoidance.
- Lack of awareness of these provisions does not exempt from responsibility.

6.6 Right to appeal

- All disciplinary decisions may be appealed in accordance with GAS.G-04 “Procedure for Appeals and Complaints.”

6.7 Interaction with the Code of Ethics

- This Policy shall be applied in conjunction with GAS.G-01 “Code of Ethics.”
- All provisions concerning reputation protection, respect for GAS, and interaction with interested parties are governed by the Code of Ethics and are mandatory for implementation within the framework of this Policy.

7. FINAL PROVISIONS

7.1 This Policy enters into force on the date of its approval by the GAS Accreditation Board and is mandatory for all assessors, experts, Commission members, and GAS personnel.

7.2 Compliance with the requirements of this Policy is a prerequisite for the involvement of personnel in accreditation activities. Failure to comply with the provisions of the Policy is considered a serious violation and entails disciplinary measures in accordance with GAS.G-01 “Code of Ethics” and GAS.G-04 “Procedure for Appeals and Complaints.”

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7.3 This Policy is subject to periodic review at least once every three years or earlier if required by changes in ISO/IEC 17011 international standards, IAF requirements, or GAS internal processes.

7.4 In the event of discrepancies between this Policy and other internal documents of GAS, the provisions of this Policy shall take precedence in matters relating to impartiality and conflict of interest management.

7.5 The current version of this document is published on the official website **gas.international**.