



IMPARTIALITY

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IMPARTIALITY

6.01 Policy Statement

Reliance Consulting has the following publicly available Impartiality statement on our website <http://beesolutions.co.za>

Reliance Consulting Verification Services are committed to ensuring that all verifications are performed impartially, independently and transparently through detailed documented and implemented procedures

Reliance Consulting Verification Services will not provide any BEE consulting services or engage in any other service that could impact the confidentiality, objectivity or impartiality of its verification activities.

In the event any member of the Reliance Consulting Verification Services team, or a member of their immediate family, has a direct financial interest, or a material indirect financial interest, in the measured entity, this creates a self-interest threat and the actions to be taken would be one of the following:

- *All interests must be disclosed through a declaration of Impartiality*
- *Dispose of the direct financial interest prior to the individual being selected for the verification;*
- *Dispose of the indirect financial interest in total or dispose of an amount of the interest to ensure that the remaining interest is no longer material prior to the individual selected for the verification; or*
- *The individual will be advised that they will not be selected for this verification*

“Impartiality is the actual and perceived presence of objectivity” SANAS-R47-02

The Verification Manager is responsible for ensuring that the policy statement contained above is available on the website. The statement is reviewed in the last annual management review meeting by the committee of every year



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6.02 Potential threats to impartiality are defined in the below table:

Potential threats	Description	Preventative Action
Self-interest threats	Includes Financial self interest and holding interests in a Measured Entity	Declaration of Impartiality, Related bodies analysis and prior association checks are performed.
Self-review threats	Analysis, review and certificate signoff is performed by same person	Clear roles & responsibilities, segregation of duties
Familiarity threats	Threat that verification employees are familiar with the Measured Entity	Declaration of Impartiality, Related bodies analysis and prior association checks are performed
Intimidation threats	Threats that there may be intimidation during verification (can be internal/ external)	Employee training is provided on procedures to use to deal with and report this.

6.03 Reliance Consulting Verification Services do not perform any BEE Consulting services or any other services (thereby ensuring no compromise of confidentiality, objectivity or impartiality). Activities are limited as per the scope in POL05 and in accordance with SANAS R47-02 (5.4). The Verification Agreement details the services that are provided and states that Reliance Consulting Verification Services does not provide BEE consulting services.

6.03.01 Employees are given training during Induction on what duties may be carried out in accordance with their roles and as employees of Reliance Consulting Verification Services as per the above and SANAS R47-02 (5.4) and specifically what would constitute consulting services. An attendance register of training provided at Induction is signed. Employees are monitored during onsite assessments to ensure that an understanding of the above translates to practice, and that therefore at no times will employees create a conflict of interest by engaging with the Measured Entity in what could be misconstrued as a consulting role at any times including while performing verification tasks/ and onsite visit. This is documented by the evaluator using the onsite assessment form (HR01)

6.03.02 No employee of Reliance Consulting Verification Services, including those in management, are allocated to a verification if they have provided BEE consulting to that measured entity within the last 2 years. This is ensured by the Verification Manager during the team selection process by reviewing the employee file (Declarations of Impartiality) and reviewing the



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Employees business interests on the Employee Information tab of the Skills Management Toolkit. Employees are required to disclose prior association through the Declaration of Impartiality for each measured entity. The Verification Manager will send an email with a declaration of Impartiality with the measured Entity name in the email title. All employees are required to complete and sign the form and return to the Verification Manager within 24 hours of receipt. Any type of relationship must be disclosed.

6.03.03 At the commencement of employment, each employee, including those in management positions, are required to sign a Declaration of Impartiality Agreement. Employees are advised that should their interests change in anyway, that the Verification Manager must be informed in writing within 7 days of the change and a new Declaration of Impartiality completed and signed by the employee. On receipt of the declaration, Employees business interests are then recorded by the Verification Manager on the Employee details tab of the Skills Management Tool.

6.03.04 It is ensured that all members selected for committees are impartial and that a balance of interests exists. Committee members must each sign a declaration of Impartiality for the specific purpose of the committee. (see Committee Procedure)

6.03.05 Measured Entities are advised of Reliance Consulting Verification Services' commitment to impartiality in the Verification Agreement. Any measured entity that has requested verification and that has been rejected on the basis of any conflict or potential conflict of interest will have the conflict noted on Verification Request Log (REG08) by the Verification Manager

6.04 Reliance Consulting Verification Services will not state or imply that BEE Verification will be simpler, faster or less expensive if a specified BEE Verification Agency or Consultancy is used. Procedures to prevent this are as follows:

- All marketing material is reviewed by the Verification Manager prior to publication and authorized in writing by email by the Verification Manager.
- No referral agreements are permitted between Reliance Consulting Verification Services and other verification agencies or consultancies
- In the event Reliance Consulting Verification Services is unable to perform the verification requested for any reason, the requesting measured entity is directed to the ABVA website in order to find another organization. Clients requesting consulting are also directed to the ABVA website

6.05 Related Bodies

Definition: A "related party" means a party that is linked to the Verification Agency by common ownership or Manager; contractual arrangement, common elements in the name, informal understanding or the means such that the related party has a vested interest in the outcome of an assessment or has a potential ability to influence the outcome of an assessment." SANAS R47-02 5.10



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Reliance Consulting Verification Services evaluates and analyses all relationships with entities that could be defined as a related body to determine if a conflict of interest is present or if the relationship poses any threat to confidentiality.

All external business interests held by all employees (Employee Information tab on the Skills Management Toolkit) and businesses with a contractual agreement with Reliance Consulting Verification Services must be evaluated by the Verification Manager and documented on REG04

6.05.01 Related bodies may have a common ownership element or another element of commonality and each relationship must be evaluated in terms of the services that are provided and whether those services may impact the confidentiality or impartiality of Reliance Consulting Verification Services. Please see related bodies evaluation REG04 for documented records. The Verification Manager is responsible for the evaluation of all entities which may be related and at the starting point whenever a new contract is entered into by Reliance Consulting Verification Services.

6.05.02 Services provided by Reliance Consulting and its related bodies must not affect confidentiality, objectivity or impartiality. Each service is to be re-evaluated annually by the Management Review Committee to identify output of the service and whether that output may pose a threat in any way to each of the threats contained within the threat definitions table detailed above in this document. Related bodies evaluations and documentation can be found on REG04

Services provided by Reliance Consulting and related bodies are analyzed and evaluated on REG04 as per above. In the event the service has been identified as a potential threat to Impartiality the Verification Manager will advise the Measured Entity of the rejection of the request for verification stating the potential for conflict of interests and threat to impartiality.

6.05.03 If a member of the verification team, or their immediate family member, has a direct financial interest, or a material indirect financial interest, in the measured entity, this creates a the self-interest threat and the actions to be taken would be one of the following:

- Dispose of the direct financial interest prior to the individual being selected for the verification;
- Dispose of the indirect financial interest in total or dispose of an amount of the interest to ensure that the remaining interest is no longer material prior to the individual selected for the verification; or
- Advise the individual that they will not be selected for this verification

6.05.04 Reliance Consulting Verification Services will not market any other service together with BEE – this is ensured by the Verification Manager who will review all marketing material prior to publication for any such reference. Related bodies are advised in writing by the Verification Manager that they are prohibited from marketing Reliance Consulting Verification Services together with any services which they may provide