NSURE PRIVATE LIMITED
IMPARTIALITY POLICY
Management of Impartiality in Certification Activities

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Compliance References	ISO/IEC 17065:2012 Clauses 4.2.1–4.2.12; GSTC Accreditation Manual v5.0 Clauses 8.5.1–8.5.2

1. POLICY STATEMENT

Nsure Private Limited is committed to conducting all certification activities with the highest degree of impartiality, objectivity, and integrity. Impartiality is fundamental to the credibility and value of the GSTC certification that Nsure issues, and to the trust that certified clients, their guests, and the broader tourism sector place in that certification.

The top management of Nsure including its owners and the General Manager is fully committed to this Policy and to the principle that no commercial, financial, personal, or other interest shall ever be permitted to compromise the impartiality of Nsure's certification activities.

This Policy applies to all Nsure personnel, including permanent staff, contract auditors, technical experts, and any third party acting on Nsure's behalf in relation to certification activities.

2. DEFINITION OF IMPARTIALITY

For the purposes of this Policy, impartiality means the actual and perceived presence of objectivity. Objectivity means that conflicts of interest do not exist, or are resolved so as not to adversely influence subsequent activities of Nsure. The following terms are synonymous with impartiality for the purposes of this Policy: independence, freedom from conflict of interest, freedom from bias, and lack of prejudice.

3. COMMITMENTS

3.1 Organisational Commitments

Nsure commits to:

- Conducting all certification activities including audit, review, certification decision, and surveillance on the sole basis of objective evidence and conformity with the Reference Standard;
- Maintaining structural separation between the evaluation function (auditing) and the certification decision function, such that no individual makes a certification decision on an audit in which they participated;
- Not providing, and not permitting any entity under its control to provide, consultancy services to any client to whom Nsure provides or may provide certification services;

- Not marketing or presenting its certification services as being linked to any consultancy organisation;
- Not allowing commercial considerations including the desire to retain client revenue to influence certification outcomes;
- Identifying risks to impartiality on an ongoing basis and taking documented action to eliminate or minimise them; and
- Making information on impartiality risks and their management available to the Impartiality Safeguarding Committee (Clause 5).

3.2 Personnel Commitments

All Nsure personnel involved in certification activities shall:

- Complete and sign a Conflict of Interest and Impartiality Declaration (NSR-FORM-009) prior to undertaking any certification work and on an annual basis thereafter;
- Disclose immediately to the General Manager any situation actual, potential, or perceived that may constitute a conflict of interest or compromise their impartiality;
- Not conduct, review, or make certification decisions for any client with whom they have, or have had within the preceding two (2) years, a consultancy, employment, or significant personal relationship;
- Not accept gifts, hospitality, or other inducements from clients or applicants beyond what is reasonable and customary; and
- Act in accordance with the principles of this Policy at all times, including outside of working hours where their conduct may reflect on Nsure.

4. IDENTIFICATION AND MANAGEMENT OF IMPARTIALITY RISKS

Nsure shall identify risks to its impartiality on an ongoing basis, addressing risks arising from its activities, its relationships, and the relationships of its personnel. This includes risks arising from ownership, governance, management, shared resources, finances, contracts, and marketing.

Identified risks shall be recorded in the Nsure Impartiality Risk Register (NSR-PROC-004, Part B of this document). For each identified risk, Nsure shall document:

- The nature and source of the risk;
- The likelihood and potential impact of the risk;
- The controls in place to eliminate or minimise the risk; and
- The residual risk level after controls are applied.

The Risk Register shall be reviewed at minimum annually and updated whenever a new risk is identified or an existing risk changes in nature or level.

5. IMPARTIALITY SAFEGUARDING MECHANISM

In accordance with ISO/IEC 17065:2012 Clause 5.2, Nsure has established an Impartiality Safeguarding Committee (ISC). The ISC provides independent oversight of Nsure's impartiality commitments and shall:

- Review and provide input on the policies and principles relating to the impartiality of Nsure's certification activities;
- Monitor for any tendency on the part of Nsure to allow commercial or other considerations to compromise impartiality;
- Review the Impartiality Risk Register at minimum annually; and
- Take independent action including informing the GSTC if it determines that the top management of Nsure is not appropriately managing impartiality risks.

The composition, terms of reference, and operating procedures of the ISC are set out in NSR-PROC-005 (Impartiality Safeguarding Committee Terms of Reference).

6. TWO-YEAR COOLING-OFF RULE

The following restrictions apply without exception:

- No Nsure personnel who has provided consultancy services to a client shall conduct audits, participate in the review process, or make certification decisions for that client for a minimum period of two (2) years from the end of the consultancy engagement;
- If, within two (2) years of an audit, any Nsure personnel involved in the audit or certification decision becomes employed by or engaged as a consultant to the audited client, the General Manager shall review the audit and all resulting certification decisions to verify that no conflict of interest existed at the time; and
- These restrictions apply regardless of whether the conflict is actual, potential, or perceived.

7. MONITORING AND REVIEW

The General Manager shall monitor compliance with this Policy on an ongoing basis. Compliance shall be reviewed formally:

- Annually, as part of the management review process (NSR-PROC-008);
- Whenever a new risk to impartiality is identified; and
- Whenever a complaint or appeal raises concerns regarding impartiality.

Any breach of this Policy by Nsure personnel shall be treated as a serious matter and may result in disciplinary action, reassignment, or termination of contract, as appropriate.

8. RELATED DOCUMENTS

Document Reference	Title
NSR-PROC-004 (Part B)	Impartiality Risk Register
NSR-PROC-005	Impartiality Safeguarding Committee Terms of Reference
NSR-FORM-009	Conflict of Interest and Impartiality Declaration Form
NSR-FORM-010	Directors and Owners Interests Register
NSR-CERT-AGR-001	Nsure GSTC Certification Agreement Template
ISO/IEC 17065:2012	Clauses 4.2.1–4.2.12 and 5.2
GSTC Accreditation Manual v5.0	Clauses 8.5.1–8.5.2

Policy Approval

Name: Babli Jahau **Title:** General Manager, Nsure Private Limited **Signature:** ____________________ **Date:** 01.09.2026	*This Policy is issued under the authority of the General Manager of Nsure Private Limited and is binding on all personnel. It shall be reviewed annually and updated as necessary to reflect changes in Nsure's operations, risk profile, or applicable requirements.*