

*This policy applies to IZALA VERIFICATORS PTY LTD personnel, independent contractors and B-BBEE experts working with IZALA VERIFICATORS PTY LTD providing B-BBEE verification services.*

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## 1. Policy

- 1.1 Izala Verificators (Pty) Ltd will undertake all B-BBEE activities without conflict of interest, bias, or partiality. Procedures have been implemented to ensure impartiality, independence, and objectivity in every element of the business thereby inspiring confidence in B-BBEE analysis and verification decisions.
- 1.2 Izala Verificators (Pty) Ltd is committed to the highest standards of confidentiality and all individuals and entities undertaking B-BBEE Verification services. Verification Team will sign an employment contract (**Doc 028–IZA**) and will respect the confidential nature of client data that is presented during the B-BBEE verification process and stored thereafter.

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## **2. Purpose of the policy**

2.1 The purpose of this policy is to ensure that:

2.1.1 All potential impartiality conflicts have a means of identification, and a method of protection for the organisation, for the manner for which impartiality issues are dealt with should they arise.

2.1.2 All information relating to a verification assignment is treated as “**Confidential**”. Where certain information requires controlled access, Izala Verificators (Pty) Ltd will enforce appropriate control procedures. All client information is classified as Confidential (available to Verification Team individuals; only verification analysts, verification senior analysts and other Izala Verificators (Pty) Ltd technical signatories).

## **3. Relationships**

3.1 Izala Verificators (Pty) Ltd will not permit any potential conflict of interest that might arise from family ties, business relationships or past associations. No individual or entity involved in the provision of verification services, including external resources, will be related to the client, hold any share or interest in the client’s business or will have conducted or quoted for any business with the client in the past two years. Any known potential business or personal relationship with the client will disbar that individual from providing verification services to that client.

3.2 Izala Verificators (Pty) Ltd will not provide verification services to any organisation where an owner or executive of Izala Verificators (Pty) Ltd is related to that organisation, holds any share or interest in that organisation’s business or will have conducted, or quoted for, any business with that organisation within the past two years.

3.3 Izala Verificators (Pty) Ltd will also ensure that there is no threat to impartiality with regards to debt/equity between Izala Verificators (Pty) Ltd and the measured entity. **(Doc 006-IZA)**

## **4. Training, Remedies, and Contracts:**

4.1 Izala Verificators (Pty) Ltd will ensure that all individuals and entities involved in the provision of verification services:

- have demonstrated their understanding of this Impartiality & Confidentiality Policy.
- are adequately trained to recognise potential threats to independence and objectivity.
- have appropriate avenues of communication to report intimidation or any undue pressure.
- will be contractually bound to implement this policy to ensure the highest degree of objectivity in their role.
- will be regularly trained on how to identify risks of impartiality.

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- will complete an annual Declaration of interests (**Doc 001-IZA**)

## **5. Client Assignment**

This policy will be implemented as a primary factor in the assignment of a lead or a client to any individual or entity.

## **6. Committees**

6.1 Any committee formed to oversee or participate in decisions regarding a verification result will be authorised and composed in such a manner that:

- Its terms of reference, duties, authorities, impartiality and responsibilities are formally documented.
- There is representation of a balance of interests such that no single interest predominates.
- It has access to all the information necessary to enable it to fulfil its functions.

## **7. Revenue**

Izala Verificators (Pty) Ltd recognises that any revenue or possible future revenue may be a cause for compromised impartiality. Izala Verificators (Pty) Ltd will not permit commercial interests to play any part in a verification conclusion. Verification accuracy and compliance with current B-BBEE legislation is the overriding objective of Izala Verificators (Pty) Ltd and all verification decisions, rulings and conclusions will be based solely on evidence provided by the measured entity.

## **8. B-BBEE Consultancy**

8.1 Izala Verificators (Pty) Ltd will not undertake any B-BBEE Consultancy services and will ensure complete legal separation between any B-BBEE Consultancy services and B-BBEE Verification Services where other legal entities are involved in providing the consultancy services.

8.2 No verification activities will be performed by any individual or entity that has provided B-BBEE consultancy services to that client within the past 4 years.

## **9. Electronic Storage**

9.1 Izala Verificators (Pty) Ltd will increasingly migrate paper documents to an electronic medium for:

- reasons of efficiency; and/or
- effective distribution of the verification business in general.

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9.2 Such electronic records will be protected, and rigorous standards will be implemented and measured to ensure their integrity. Information Technology systems will adhere to accepted industry security standards and will implement appropriate access control techniques.

## **10. Paper Records**

Paper files and records will be protected by appropriate physical access control systems and procedures.

## **11. Third Party Access**

SANAS will be given full access to all Izala Verificators (Pty) Ltd client files during mandatory inspections or assessments, and this will be done based on the above confidentiality classifications and the client will be informed accordingly. No other individual or entity will be given access to customer information without the consent of the client.

## **12. Competence**

Izala Verificators (Pty) Ltd will ensure that all administrative and IT personnel and individuals and entities involved in B-BBEE verification services are trained, have demonstrated competence, and comply with this Confidentiality policy and its supporting physical and electronic procedures. Any external suppliers will be bound contractually.

## **13. Outside Sources**

13.1 Information received about a Measured Entity from a source other than the Measured Entity itself shall be treated according to the assigned confidentiality classification for that Measured Entity.

13.2 Outsourcing work for verifications is to be addressed in a separate policy (**Pol 006-IZA**) but also address the issue of confidentiality. (**Doc 007-IZA, Doc 001-IZA and Doc 003-IZA**)

## **14. Committee Members Confidentiality Agreement**

Members receiving information from committee meetings regarding issues about clients and Izala Verificators (Pty) Ltd will be aware of confidentiality requirements.

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**15. References to related Legislation, procedures, and documents:**

SANAS R47-03
Impartiality & Confidentiality Procedure: (Proc 008-IZA)
Undue Pressure: (Proc 009-IZA)
Standard Terms and Conditions: (Doc 006-IZA)
Impartiality & Confidentiality Declaration: (Doc 001-IZA)
Outsourcing Agreement: (Doc 003-IZA)
Debt Equity Relationship: Doc 028-IZA
Confidentiality Agreement: Doc 007-IZA
B-BBEE Paper File: (Proc 007-IZA)
Committee Member Confidentiality Agreement: (Doc 008-IZA)
Employment Contract: (Doc 028-IZA)