



**World Halal Trust**

**MECHANISM FOR SAFEGUARDING  
IMPARTIALITY**

# **TABLE OF CONTENTS**

<b><u>INTRODUCTION .....</u></b>	<b><u>2</u></b>
<b><u>WHT GROUP'S IMPARTIALITY PHILOSOPHY .....</u></b>	<b><u>2</u></b>
<b><u>PRINCIPLES OF IMPARTIALITY .....</u></b>	<b><u>2</u></b>
<b><u>IDENTIFICATION OF RISKS .....</u></b>	<b><u>4</u></b>
<b><u>RISK CONTROL .....</u></b>	<b><u>5</u></b>
<b>TOP MANAGEMENT .....</b>	<b>5</b>
<b>WHT GROUP'S SHARIAH COMMITTEE .....</b>	<b>5</b>
<b>WHT GROUP'S IMPARTIALITY COMMITTEE .....</b>	<b>5</b>
<b>AUDITORS .....</b>	<b>6</b>

## **INTRODUCTION**

World Halal Trust Group (hereinafter WHT Group, Certification Body) provides Halal certification services for a wide range of markets and areas. Each WHT Group's subsidiary is responsible for all decisions related to the provision, refusal, control, scope expansion/reduction, suspension and withdrawal of its Clients' Halal certification within this subsidiary.

Our goal is to provide services that are fully consistent with the principles of justice, responsibility, confidentiality and impartiality. We guarantee that in our organisation conflicts of interest are avoided or successfully resolved with full responsibility and openness.

We strive to ensure that our certification process meets international requirements and standards.

Our certification processes are constantly reviewed and improved to increase the effectiveness of the Management System defined in the Quality Management System documents.

## **WHT GROUP'S IMPARTIALITY PHILOSOPHY**

Effective impartiality management is one of the most important aspects of providing high-quality certification services that our Clients and the community can rely on. We must understand and address the threats of impartiality in order to maintain the objectivity of our actions.

We seek to ensure that:

- a. impartiality is an integral part of all aspects in the certification process within all WHT subsidiaries;
- b. commercial, financial or other pressures do not affect certification decisions within any WHT subsidiaries;
- c. threats to impartiality are successfully identified and addressed within all WHT Group;
- d. we consult with relevant stakeholders of all WHT subsidiaries on issues related to impartiality.

## **PRINCIPLES OF IMPARTIALITY**

Threats to impartiality may arise from a number of sources:

- a. manipulation on certification fees (a potential Client may offer a higher fee in order to obtain a Halal certificate);
- b. pressure during certification audits (auditors may be offered a bribe for better audit results);
- c. trust and acquaintance with people in the certification process;
- d. intimidation, offers of bribery or other unacceptable behaviour from the Clients' side (real or perceived), aimed to influence the decision on certification.

To this end, WHT Group is committed to identify and adequately address threats to impartiality:

- a. audit reports are periodically evaluated by the WHT Group's Shariah Committee and the WHT Group's Head of the Halal Certification;
- b. all WHT Group's employees sign confidentiality and code of ethics agreements under the relevant WHT subsidiary;
- c. WHT Group's personnel are required to report all threats, offers of bribery or potential conflicts of interest to the WHT Group's Impartiality Committee as well as the Top Management of the relevant WHT subsidiary;
- d. the Top Management of the relevant WHT subsidiary is obliged to investigate each report and take appropriate actions, such as termination of cooperation with a compromised Client, removal/dismissal of compromised personnel, report to the relevant authorities, legal processes, etc.;
- e. the personnel involved in Halal Certification activities should not have personal relationships with the personnel of the Client. If there is such a relationship, an employee should immediately inform the Top Management of the relevant WHT subsidiary and the WHT Group's Impartiality Committee about this and should be suspended from work with this Client;
- f. all WHT Group's personnel is regularly trained on impartiality as a part of WHT Group's training program;
- g. the decision on certification is taken by the Halal Certification Committee of the relevant WHT subsidiary, members of which are not involved in the certification process itself and, when making decisions, rely on information provided by the Halal Certification Unit of the relevant WHT subsidiary.
- h. an impartiality risk assessment is periodically (at least once a year) carried out by the WHT Group's Impartiality Committee to ensure that risks are minimised and controlled;
- i. no commercial or financial pressure is allowed within the WHT Group. In case of such pressure, the employee who is exerted such pressure should immediately inform the WHT Group's Impartiality Committee about this. In turn, the WHT Group's Impartiality Committee is obliged to investigate each such report and take appropriate actions to resolve the risk that has arisen, in a way such as the removal/dismissal of compromised personnel, a report to the relevant authorities, legal processes;
- j. WHT Group does not provide any advisory services to any organisations to avoid conflicts of interest;
- k. WHT Group does not stand on the side of its Clients/Partners in any disputes, litigations or other events requiring giving recommendations to the Client/Partner;
- l. The activities of WHT Group's Clients/subcontractors/Partners are regularly assessed on impartiality risks. If such risks are found, the WHT Group's Top Management and the WHT Group's Impartiality Committee develop and implement measures to reduce/eliminate risks, such as: additional clauses in service/cooperation agreements, termination of cooperation with a compromised Client/subcontractor/Partner, report to the relevant authorities, legal processes, etc.;

- m. WHT Group's personnel cannot be used to provide certification services or make a certification decision for a product for which they have provided consultancy for a period of 2 (two) years since the provision of the consultancy.

## **IDENTIFICATION OF RISKS**

By identifying risks, WHT Group can identify, analyse, document and minimise/eliminate potential conflicts of interest and impartiality risks that arise during certification process and/or arising from this activity. The WHT Group's Impartiality Committee regularly (at least once a year) identifies and analyses the risks of impartiality according to the following scheme:

- a. through brainstorming and SWOT analysis, the WHT Group's Impartiality Committee and all WHT Group's staff identify all potential impartiality risks, regardless of the existing measures to minimise and control them;
- b. the WHT Group's Impartiality Committee uses the results of brainstorming and SWOT analysis to identify current risks, by analysing each result, and adding them to the risk tables regardless of the existing measures to minimise and control these risks;
- c. by the root cause analysis method, each identified risk is assigned a category of probability of its realisation (from low to high);
- d. by the root cause analysis method, each identified risk is assigned a consequence severity score in the event of a risk occurrence (from low to high);
- e. for medium and high probability risk realisation categories, risk minimisation measures shall be established. If these measures are already implemented within the organisation, they are put in the corresponding column of the risk table. In the absence of these measures in the organisation for a specific risk, risk minimisation measures developed by the WHT Group's Impartiality Committee are confirmed with the WHT Group's Top Management as well as the Top Management of each WHT subsidiary and are carried out by responsible employees within the Certification Body;
- f. after the identification, development and implementation of risk minimisation measures, the reassessment of probability of risk realisation is carried out (during the reassessment, the probability of the of a risk realisation should not exceed the middle category). If it is not possible to achieve this level through risk minimisation measures, it is necessary to assemble a council consisting of the WHT Group's Top Management members, the Top Management of each WHT subsidiary, the WHT Group's Impartiality Committee members and the WHT Group's Shariah committee members and either to develop the effective methods to minimise the risk or to stop or reduce activities related to this risk;
- g. all identified risks should be continuously monitored and controlled by the WHT Group's Impartiality Committee, WHT Group's Top Management and the Top Management of each WHT subsidiary until the next event of identification, evaluation, analysis and minimisation of impartiality risks.

## **RISK CONTROL**

In the event of impartiality risks' identification, WHT Group takes immediate actions to eliminate or minimise these risks:

- a. restrictions may be imposed on compromised personnel and/or Clients;
- b. change of staff if the original staff is compromised;
- c. labour and/or certification agreements may be suspended or terminated;
- d. making changes to the organisational activity, for example, the exclusion of the most critical areas;
- e. the identified threats to impartiality may be reported to the relevant authorities.

### **Top Management**

WHT Group's Top Management as well as the Top Management of each WHT subsidiary is required to accept all reports of potential threats to impartiality. These reports should be examined by taking all necessary actions to determine whether they are reasonable. In case of a violation of the impartiality principles, immediate actions are required in order to eliminate the threat and prevent its occurrence in the future.

### **WHT Group's Shariah Committee**

WHT Group's Shariah Committee is responsible for the periodical review of Clients' audit reports submitted by the Halal Certification Unit of each WHT subsidiary. The members of the WHT Group's Shariah Committee compare these reports to the information provided in the Clients' documents and in case of any incompatibilities have the right to ask the auditors of the relevant WHT subsidiary questions and report these incompatibilities to the Head of the Halal Certification.

### **WHT Group's Impartiality Committee**

The WHT Group's Impartiality Committee consists of representatives from the following interested parties: the Certification Body, local Islamic Authority (community), Customers, end users, association and a food safety and quality specialist. The Committee must include at least one member from each country where WHT subsidiaries operate. The Committee is responsible for the regular internal reviews. If risks or problems are discovered, the report is sent to the WHT Group's Top Management or to the Top Management of the relevant WHT subsidiary for it to take immediate actions. The Committee has the authority to report violations of impartiality to all authorised bodies outside the organisation (accreditation bodies).

### **WHT Group's Head of Halal Certification**

The WHT Group's Head of Halal Certification is responsible for the ongoing monitoring of all WHT Group auditors' work. In the event of any suspicion of a violation of the impartiality principles, has the right to take all necessary actions to investigate the problem and collect all the necessary information for the problem to be solved by the WHT Group's Top Management.

## **Auditors**

Are responsible for the performance of their work based on the principles of honesty, justice and impartiality. In case of any pressure or any attempts to violate the principles of confidentiality from the Client, are obliged report the violation of the impartiality principles to the Top Management of the relevant subsidiary.

## **ADMINISTRATION POLICY**

This Mechanism should be annually reviewed by the WHT Group's Head of the Halal Certification, the WHT Group's Shariah Committee and the WHT Group's Impartiality Committee and approved by the WHT Group's CEO.