

## 1. Purpose

The purpose of the BioToxLab impartiality policy is to ensure that all services at the Laboratory are undertaken impartially, and that they are structured and managed always to safeguard impartiality.

BioToxLab commits to identify risks to impartiality and implement measures to eliminate or mitigate the risks. Objectivity will always be maintained by ensuring that conflicts of interest do not exist, or if identified, are resolved so as not to adversely influence subsequent activities of the Laboratory.

In the context of the toxicity testing services offered by BioToxLab, being impartial includes ensuring that:

- a) Toxicity testing activities (and any other associated activities) are conducted without bias;
- b) Results are not influenced or have the appearance of being influenced by any relationship the Laboratory or any staff may have with a client, supplier or service provider;
- c) Laboratory activities cannot be influenced by any undue pressure being put on BioToxLab staff by any person.

BioToxLab recognizes that there can be internal and external risks to impartiality:

**Internal risks** to impartiality include for example, supervisors putting pressure on analysts and technicians to adjust procedures to improve turn-around time, or to deviate from procedures just to please a client. The provision of financial or other incentives for productivity, e.g. to improve the number of tests conducted, or for releasing results of tests fast also represents a form of undue internal pressure.

**External risks** to impartiality cover all the possibilities that could cause bias, including, business relationships between BioToxLab and the client; family or personal relationships between staff of the Laboratory who will be involved in laboratory activities and the client; financial interests, such as ownership in a client/supplier/service provider company, or in a venture that has interest in the test results. BioToxLab recognizes that having a relationship with a client/supplier/service provider does not necessarily mean that there is a risk of impartiality or conflict of interest, but the Laboratory will recognize such a risk and demonstrate that the risk has been minimized or eliminated.

## 2. Impartiality Policy Statement

The BioToxLab impartiality policy (section 4.1 of the quality manual) applies to ALL personnel (including Directors & Shareholders). It specifies BioToxLab's policy on conflict of interest and impartiality. It also discusses how to recognize and deal with conflict of interest and risks to impartiality. To inspire confidence and credibility, BioToxlab will demonstrate independence, impartiality, and competence both in action and appearance.

BioToxLab is fully aware that impartiality is one of the fundamental principles that must be guaranteed by a toxicity testing laboratory. It recognizes the utmost importance of impartiality and potential conflicts of interests in promoting confidence when conducting its toxicity testing activities.

BioToxLab' Management is fully committed to ensure that all activities are carried out impartially and objectively and are perceived as such by all stakeholders, in compliance with the relevant requirements and best practices.

For this reason, BioToxLab is committed to:

- a) Create a culture of awareness to always consider potential risks to impartiality when taking on new clients, or using new suppliers/service providers, or when new personnel are employed and to honour the agreement (QM4.1/R-45) with the company and conform to the requirements of the BioToxLab Code of Conduct/Ethics (QM6.2/F-24) and always declare any potential/actual conflicts of interest or undue pressures which may influence integrity or impartiality.
- b) Conduct reviews of impartiality risks during the annual Management Reviews.
- c) Follow section 8.5 of the quality manual if any risk is identified.
- d) Ensure that procedures for accessing BioToxLab services are fair and non-discriminatory, and treated as such.
- e) Continually identify risks to the impartiality of BioToxLab arising from its activities, its relationships or relationships of its employees.
- f) Analyse, evaluate, treat, monitor, and document the identified risks and demonstrate how to eliminate or minimize such risks to the impartiality.
- g) Provide employees with the knowledge required to operate in accordance with impartiality and ask its personnel to sign a commitment to promptly declare any situation that may constitute a conflict of interest.
- h) Not allow personnel, family, commercial, financial, or other pressures to compromise impartiality of BioToxLab activities.
- i) Ensure that separate legal entities, with whom it has relationships, do not compromise the impartiality of BioToxLab activities.
- j) Handle all dealings with all entities in full compliance with the ISO/IEC 17025 requirements.
- k) Not provide any toxicity testing service if unacceptable threats arise, or mitigate the risks before providing the service.
- l) Act decisively to respond to any threat to its impartiality arising from the actions of other persons, bodies or organizations.
- m) Provide a mechanism to safeguard the impartiality of BioToxLab which ensures a balanced representation of the relevant interested parties, without the prevalence of individual interests.

Directors:  
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Pieter Kotze  
Lizet Swart

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