



## Oxebridge Quality Resources International LLC

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### FORMAL COMPLAINT SUBMITTAL <sup>r0</sup>

**AMENDED – 3 OCTOBER 2019**

QualityAustria  
Zelinkagasse 10/3  
1010 Wien, Austria

Via email to [office@qualityaustria.com](mailto:office@qualityaustria.com)

Copied to [headoffice@iqnet.ch](mailto:headoffice@iqnet.ch), [norman.brunner@bmdw.gv.at](mailto:norman.brunner@bmdw.gv.at), [otto.kreiter@qualityaustria.com](mailto:otto.kreiter@qualityaustria.com)

3 October 2019

#### 1. PREAMBLE

Oxebridge Quality Resources International (Oxebridge) hereby requests formal corrective action in accordance with clauses 4.7 and 9.8 of ISO 17021-1:2015, to include a documented acknowledgement of receipt of this complaint, a thorough and systemic investigation, corrective and preventive corrective action, and notification of actions taken when complete.

This complaint was originally filed on 25 September, and has been amended on 3 October to add new information related to the conflicts of interest due to the roles of Mr. Zeljko Cvjetinovic and Mr. Prabath de Silva.

Due to their being named as active parties in this complaint, we ask that Ms. Linda Ross, Mr. Zeljko Cvjetinovic and Mr. Prabath de Silva recuse themselves from any role in the processing of this complaint. Because of their names appearing on certificates that form the evidence herein, we also ask that Konrad Schreiber (QualityAustria), Wolfgang Leitner (QualityAustria), Friedrich Khuen-Belasi (IQNet) and Michael Drechsel (IQNet) likewise recuse themselves.

NOTE: ISO 17021-1 clause 4.7 indicates that complaints may be issued to certification bodies by "parties that rely on certification," and not only direct clients of the certification body. It furthermore references ISO 10002 in its section on complaints, and ISO 10002 allows for the submission of complaints to certification bodies by "interested parties," and not just direct customers. Based on this information, Oxebridge asserts it right to submit this complaint not only on behalf of its clients, but on behalf of itself as an interested party and industry stakeholder, directly concerned with the validity of the certificates issued by accredited certification bodies.

#### 2. APPLICABLE ISO 17021 CLAUSES

The herein complaint relies on the knowledge that QualityAustria is accredited by Akkreditierung Austria to ISO 17021-1:2015 for the issuance of ISO 9001 certificates, and that as a result QualityAustria is subject to the following rules and definitions from ISO 17021-1:

*4.2.3 To obtain and maintain confidence, it is essential that a certification body's decisions be based on objective evidence of conformity (or nonconformity) obtained by the certification body, and that its decisions are not influenced by other interests or by other parties.*

*4.2.4 Threats to impartiality include the following:*

- a) Self-interest threats: threats that arise from a person or body acting in their own interest. A concern related to certification, as a threat to impartiality, is financial self-interest.*
- b) Self-review threats: threats that arise from a person or body reviewing the work done by themselves. Auditing the management systems of a client to whom the certification body provided management systems consultancy would be a self-review threat.*
- c) Familiarity (or trust) threats: threats that arise from a person or body being too familiar with or trusting of another person instead of seeking audit evidence.*

*5.2.3 When a relationship poses an unacceptable threat to impartiality (such as a wholly owned subsidiary of the certification body requesting certification from its parent), then certification shall not be provided.*

*NOTE A relationship that threatens the impartiality of the certification body can be based on ... shared resources, finances, contracts, marketing and payment of a sales commission or other inducement for the referral of new clients, etc.*

*5.2.5 The certification body and any part of the same legal entity shall not offer or provide management system consultancy.*

*5.2.7 The certification body shall not certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and the certification body poses an unacceptable threat to the impartiality of the certification body.*

*5.2.12 All certification body personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality.*

*5.3.2 The certification body shall evaluate its finances and sources of income and demonstrate to the committee specified in 6.2 that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.*

### **3. ALLEGATIONS - GENERAL**

As part of its ISO Whistleblower Program, it was discovered that QualityAustria had issued an ISO 9001:2008 certificate to the company QatarQualityPlus ("QQP") while the owner of QQP was simultaneously working as a Qatar-based representative for QualityAustria Gulf, the official regional office of QualityAustria. This represents an insurmountable conflict of interest in violation of ISO 17021-1.

Furthermore, QualityAustria then issued certificates to at least six companies that underwent consulting by QQP, in additional violations of ISO 17021-1.

#### 4. EVIDENCE

Note: copies of evidence are on file with Oxebridge, and available for review, in the event that links have changed since the filing of this complaint.

The website for QQP located at [https://www.qatarqualityplus.com/html/qqp\\_certificate.html](https://www.qatarqualityplus.com/html/qqp_certificate.html) includes images of two ISO 9001:2008 certificates issued to QQP by QualityAustria. The first is attached as EXHIBIT 01 and was issued in August of 2010, with the accreditation mark of Akkreditierung Austria. The second is attached as EXHIBIT 02 and was issued on the same date, but bears the IQNet logo as well as the accreditation mark of Akkreditierung Austria; QualityAustria is also a part of the IQNet network of accredited certification bodies.

The owner of QQP is known as one Ms. Linda Ross, as per her LinkedIn profile located at <https://www.linkedin.com/in/linda-ross-1aa59215/>. In addition, Ms. Ross was previously listed as the General Manager of QQP on the website MyQBD.com; that listing has since been deleted, but a cached view may be found at [https://webcache.googleusercontent.com/search?q=cache:BJ5JCXABWaEJ:https://www.myqbd.com/qatar-companies-profile-rev/5425/QATAR\\_QUALITY\\_PLUS+&cd=13&hl=en&ct=clnk&gl=us](https://webcache.googleusercontent.com/search?q=cache:BJ5JCXABWaEJ:https://www.myqbd.com/qatar-companies-profile-rev/5425/QATAR_QUALITY_PLUS+&cd=13&hl=en&ct=clnk&gl=us), which shows the following:



Ms. Ross then appears on the QQP website in a photo posing with the Allied Security Company branch of Qatar Cleaning Company during the receipt of their ISO 9001 certification; see:

<https://www.qatarqualityplus.com/html/testimonials.html> .

At the same time, Ms. Ross was working for QualityAustria in the capacity of “Regional Partner” of the “Qatar and Gulf” division of QualityAustria, known as QualityAustria Gulf. In an official QualityAustria publication dated July 2010, Ms. Ross is featured as the Qatar and Gulf division representative, with her photo and contact information appearing on page 43 of that document; that may be viewed at

<https://www.yumpu.com/en/document/read/4004606/international-qualification-programme-quality-austria/42> .

Ms. Ross' name, position and signature then appear on an official training certificate issued by QualityAustria Gulf to an attendee of a Quality Management Systems Lead Auditor training course; this is attached as EXHIBIT 03.

Ms. Ross is referenced as well on the website for QualityAustria Gulf, in a press release related to the certification of the Qatar Meteorological Department of Civil Aviation Authority, at <http://www.qualityaustriagulf.com/qatar-meteorological-department-of-civil-aviation-authority-in-qatar-has-successfully-been-certified-to-iso-9001.html> .

On the QualityAustria Gulf Facebook page, located at <https://www.facebook.com/pg/Quality-Austria-Gulf-Arabia-407771312717846/about/> , Ms. Ross is listed as the current contact as of September 2019.

Based on the August 2010 date of the ISO 9001 certificates issued to her company QQP, and the June 2010 publication date of the official QualityAustria publication wherein she is listed as a regional representative, it is clear from the evidence that Ms. Ross simultaneously owned QQP while obtaining an ISO 9001 certificate from QualityAustria.

Ms. Ross currently operates QQP and, based on her Facebook page, still acts in the capacity of representative for QualityAustria. This means that her positions in both companies remain current.

Furthermore, QualityAustria consistently provided ISO 9001 certificates to consulting clients of QQP, with the knowledge that they were doing so to companies that worked with Ms. Ross:

1. Per the QQP website, it assisted Allied Security Company and Qatar Cleaning Company with ISO 9001 consulting. Official records on the QualityAustria site show that Qatar Cleaning Company was then certified to ISO 9001 by QualityAustria under certificate Q-08969/0 (see EXHIBIT 04) and Allied Security was then certified to ISO 9001 by QualityAustria under certificate Q-08969/1: (see EXHIBIT 05). In this case, the photos appearing on the QQP website show Ms. Ross personally involved in the certification ceremony, making it impossible that QualityAustria could claim not to know she was responsible for the consulting. ***In fact, in this case Ms. Ross would literally be giving the ISO 9001 certificate to herself.***
2. Per the QQP website, it assisted Khalid Cement with ISO 14001 consulting. Photos appearing on the QQP website page show the certificate was issued by QualityAustria.
3. Per the QQP website, it assisted Blue Steel with ISO 9001 consulting. Photos appearing simultaneously on the QQP website and the official QualityAustria Gulf Facebook page show the certificate was issued by QualityAustria.
4. Per the QQP website, it assisted Contraco WLL with ISO 9001 consulting. Photos appearing simultaneously on the QQP website and the official QualityAustria Gulf Facebook page show the certificate was issued by QualityAustria. Official records on the QualityAustria site show that Contraco was then certified to ISO 9001 by QualityAustria under certificate Q-10834/0: (see EXHIBIT 06).
5. Per the QQP website, it assisted Doha Extraco Company with ISO 9001 consulting. Official records on the QualityAustria site show that Doha Extraco was then certified to ISO 9001 by QualityAustria under certificate Q-20163/0: (see EXHIBIT 07).

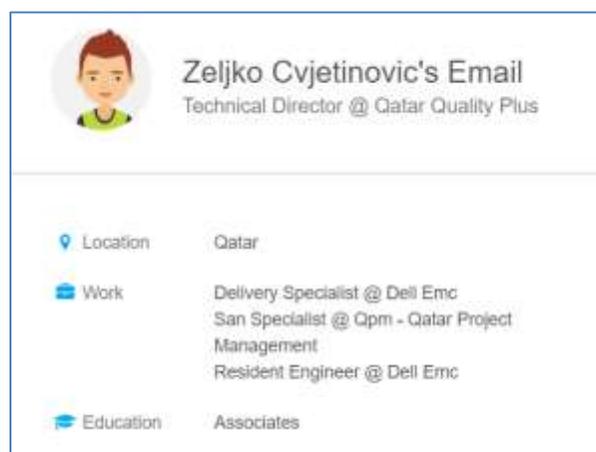
In some of the above cases, the companies were originally issued ISO 9001:2008 certificates and later re-issued certificates to ISO 9001:2015, meaning QualityAustria has continued to ignore the relationship between their clients and QQP for nearly a decade.

In addition, Mr. Zeljko Cvjetinovic and Mr. Prabath de Silva both hold simultaneous roles in QualityAustria Gulf and QQP.

Mr. Zeljko (“Joe”) Cvjetinovic is understood to be the husband of Ms. Ross. He currently holds the title of General Manager for QualityAustriaGulf, as at <http://www.qualityaustriagulf.com/> and <https://www.linkedin.com/in/zeljko cvjetinovic/>. The following image was taken from the QualityAustriaGulf website as of 3 October 2019:

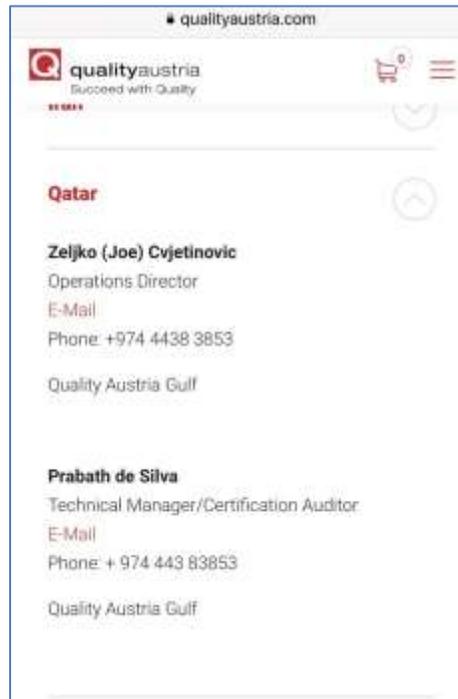


At the same time, Mr. Cvjetinovic is also listed as the Technical Director for QQP as shown here in this screenshot taken from [https://rocketreach.co/zeljko-cvjetinovic-email\\_19132028](https://rocketreach.co/zeljko-cvjetinovic-email_19132028):



Mr. Prabath de Silva also appears to hold positions in both companies. Mr. de Silva is listed as Technical Manager / Audit Manager for QualityAustriaGulf in multiple online press releases, including <https://m.gulf-times.com/story/371401> and <https://www.qatarliving.com/events/business-continuity-representative-training>. Both Mr. Cvjetinovic and Mr. de Silva are referenced together in an official press release on the QualityAustriaGulf website, with their titles being given as General Manager and Technical Manager respectively, at: <http://www.qualityaustriagulf.com/tokyo-freight-services-successfully-achieves-international-certifications.html>.

Mr. de Silva was listed as the Technical Manager / Certification Auditor for QualityAustria main website until recently, as shown below. The directly link for this cannot currently be located:



At the same time, Mr. de Silva is listed as the Operations Manager at Qatar Quality Plus, per the following screenshot taken from [https://rocketreach.co/prabhath-de-silva-email\\_61132203](https://rocketreach.co/prabhath-de-silva-email_61132203):



## 6. ALLEGATIONS - SPECIFIC

Based on the evidence presented herein, Oxebridge alleges that QualityAustria is currently in severe breach of ISO 17021-1:2015 as follows:

- A. By providing an ISO 9001 certificate to a company owned by three of its key staff members, QualityAustria violated ISO 17021-1 clauses 4.2.3, 4.2.4, 5.2.3, 5.2.5, and 5.2.7 which intend to manage conflicts of interest.
- B. By then providing ISO 9001 certificates to at least six companies that had received consulting services from QQP, QualityAustria further violated ISO 17021-1 clauses 4.2.3, 4.2.4, 5.2.3, and more specifically 5.2.7 which requires, *“the certification body shall not certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and the certification body poses an unacceptable threat to the impartiality of the certification body.”*
- C. The issuance of these certificates also provides evidence that QualityAustria violated ISO 17021-1 clause 5.2.12 by not ensuring that its *“certification body personnel, either internal or external, or committees, who could influence the certification activities, shall act impartially and shall not allow commercial, financial or other pressures to compromise impartiality.”*
- D. The issuance of these certificates also provides evidence that QualityAustria violated ISO 17021-1 clause 5.3.2 by not ensuring *“the certification body shall evaluate its finances and sources of income and demonstrate to the committee specified in 6.2 that initially, and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.”*

Please note that while this complaint only uncovered a handful of ISO 9001 certificates issued by QualityAustria to QQP clients, because those found dated back to 2010, and because all evidence suggests that Ms. Ross, Mr. Cvjetinovic and Mr. de Silva have retained their positions in both companies until the present day, ***it cannot be known how many other QQP companies were also certified by QualityAustria over the subsequent decade.*** The numbers may be very high, and Oxebridge demands that QualityAustria take a full accounting of the number of companies and certificates affected.

Oxebridge formally requests that QualityAustria perform a proper and thorough investigation to identify the root cause of the problem identified herein. ***We ask that you do not constrain yourself only to the evidence indicated herein or to the ISO 17021-1 clauses listed, as further related evidence or violations may exist which you must discover.*** A copy of this complaint is being sent to your Accreditation Body, and the issue will be escalated to that AB in the event that you do not properly respond, pursuant to IAF membership rules.

Respectfully,



Christopher Paris  
VP Operations