

Declaration of the Superior Management on Impartiality

Certification is a matter of trust. We, TÜV Saarland Certification GmbH, understand the important role of impartiality for certification based on trust. We offer our certification services on a basis free from discrimination; they are available to all companies. Certification rules and procedures are structured in a way that they are fair, transparent and comprehensible for all applicants.

The Certification Body staff involved in the certification process is obliged to act on an objective and impartial basis and to identify risks to impartiality due to conflicts of interest, a lack of objectiveness, relationships between individuals involved and intimidation.

To ensure impartiality, Certification Body staff is under no financial and commercial influence or technical instructions by the Superior Management, other business segments or associated companies when it comes to activities and decisions during the certification process.

The Superior Management undertakes

- not to offer to or perform certification with another certification body;
- not to offer or provide consultancy services to customers, to exclude consultancy services from the range of services provided by the certification body or parts of the same legal person and not to communicate inappropriate connections or statements;
- not to offer internal audits to certified customers;
- to ensure that customers who have undergone internal audits can be certified only two (2) years thereafter;
- to ensure that customers cannot be certified for two (2) years if the applicant was provided with consultancy services on management systems by bodies affiliated with TÜV Saarland Certification GmbH and if this poses a considerable threat to the certification body's impartiality;
- not to conclude contracts with consultancy firms which provide for the transfer of certification responsibilities or services:
- not to commission employees for two (2) years if they provided consultancy services for management systems with the applicant;
- to ensure that activities of other separate legal persons with which the certification body themselves or the legal person to which they belong is affiliated do not impact on impartiality regarding certification activities;
- to ensure that the Certification Body superior management and staff involved in assessments and the decision-making process for certifications are not involved in activities of the separate legal person if the latter offers or manufactures the product certified in terms of ISO 17065 (including products still to be certified) and to ensure that the separate legal person's staff is not involved in the Certification Body's management, assessments or certification decisions;

- not to commission staff with assessing products and/or making product certification decisions for two (2) years if they previously provided consultancy services for those products;
- not to be the developer, implementer, operator or adviser of certified processes;
- not to be the developer, implementer, provider or adviser of certified services;
- not to offer or provide to the customers any management system consultancy services or internal audits in cases where the certification programme includes an evaluation of the customers' management systems;
- not to provide (consultancy) services in the following areas:
 - o risk assessment;
 - o occupational safety and health checks and internal audits:
 - communication with regulatory bodies on the customers' behalf;
 - assistance with the development of management systems related to occupational safety and health with organisations; and
 - o accident and breakdown checks.

A risk management process was established to determine the possible risk of conflicts of interests resulting from certifications, relationships with affiliated bodies and activities performed by other individuals, bodies or organisations. We constantly identify and evaluate any threats to impartiality and we implement appropriate measures to react to these threats.

Our Steering Committee consists of parties involved in certifications. The Superior Management regularly grants the Steering Committee a right to inspect risks analyses and the manner we deal with complaints and objections so that the Committee is able to form an opinion about risk levels, effectiveness of measures to protect impartiality and independence of certification decisions.

The Superior Management undertakes to openly deal with any complaints and objections. The Company's business policies include reasonable assessment for clarification and purposeful treatment of legitimate complaints/objections.

TÜV Saarland Certification GmbH The Managing Directors

As at 2019-08