

## Impartiality and confidentiality control procedure

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<b>1 PURPOSE</b>
<p>This document is specially formulated to ensure the impartiality of the certification work and to safeguard the confidentiality of the information of the applicant and the certified organization. This document sets forth the basic guidelines and working procedures for the impartiality management and confidentiality management of AAPA in accordance with the requirements of the AAPA-QM-001 Quality Manual.</p>
<b>2 SCOPE</b>
<p>This document is applicable to all activities and processes involving AAPA in the process of conducting certification activities involving impartial management and confidentiality management.</p> <p>Impartiality of certification: Conflicts of interest that may exist in the conduct of certification work have been identified or resolved and will not adversely affect the follow-up activities of the certification body.</p> <p>Secrecy level1 determinant: A person who has the right to set a confidential level for information that needs to be kept confidential. Such as the issuer of the document, the moderator of the meeting, the person in charge of each department of the company, and the head of the inspection team.</p>
<b>3 ROLES &amp; RESPONSIBILITIES</b>
<p>3.1 The general manager proposed a policy and regulations to maintain impartiality and made a written commitment to the Impartiality of the certification activities. Determine the organizational structure and responsibilities for maintaining Impartiality operation of certification activities;</p> <p>3.2 The Impartiality Management Committee participates in the formulation of guidelines and policies related to impartiality; and supervises matters that may affect impartiality.</p> <p>3.3 HR is responsible for organizing relevant factors for identifying the threats of each department and taking control measures.</p> <p>3.4 HR is responsible for the confidentiality management, and all relevant departments implement confidential management and propose improvement suggestions according to their duties.</p>
<b>4 PROCEDURE</b>
<p>4.1 Basic principles and policies</p> <p>4.1.1 The Human Resources Department develops policies and policies to maintain the integrity of certification;</p> <p>4.1.2 Publish to the outside world, a written commitment to the Impartiality of the certification activities;</p> <p>4.1.3 Maintaining the structure of the Impartiality operation of the certification activities;</p> <p>4.1.4 Continuously identify and analyze the possibility of conflicts of interest arising from certification activities; control and manage aspects that may affect the Impartiality of certification.</p> <p>4.1.4 The company's management committee, which is composed of relevant parties and maintains impartiality, participates in the impartial management of various certifications and</p>

supervises impartiality. Committee members can participate in impartial management by telephone or online access.

4.1.5 Ensure that all internal and external personnel are aware of the need for Impartiality.

4.1.6 Basic policy: information open, methods transparent, independent work, and avoid conflicts of interest.

4.2 Impartiality risk identification

HR is responsible for organizing and documenting the likelihood of conflicts of interest arising from certification activities and may include: institutional ownership, corporate structure, management, personnel, shared resources, finances, contracts, and Commission or other benefits to the person or organization introducing the new customer.

When a Impartiality risk is identified, HR should organize relevant departments to eliminate or minimize such risks.

4.2.2 Impartiality management of certification acceptance

4.2.2.1 The company does not conduct certification and consulting activities on systems, processes or services with any part of the same legal entity and entities under its control. At the same time, ensuring the activities of other legal entities that are directly associated with or associated with their affiliates does not compromise the Impartiality of their certification activities.

4.2.2.2 The company does not provide or recommend system consulting, nor does it provide quotations for system consulting.

4.2.2.3 The company does not provide internal audits to certified customers.

4.2.2.4 If the customer accepts a system, service consultation or internal audit conducted by an advisory body that may pose a threat to the impartiality of the company's certification, it will not be certified.

4.2.2.5 The company's marketing or quotation is not linked to the activities of the consulting organization. Not claiming or implying a certification consulting organization will make certification easier, easier, faster or cheaper.

4.2.2.6 Before the acceptance of the application, sales shall fully consider the scope of the application for certification, the organization of the application, the consulting organization and personnel, etc, to identify the threat of impartiality and take control measures.

4.3 Impartiality management of certification personnel

4.3.1 HR requires certification personnel (including full-time and part-time inspectors) to promptly respond to any information they are aware of that may cause them or the certification body to fall into a conflict of interest. Use this information to identify threats to the Impartiality of the activities of them or their organizations, and to use them after they can prove that there is no conflict of interest.

4.3.2 All personnel (internal or external) and management committee personnel who can influence the certification activities shall perform their duties fairly and shall not be allowed to damage the Impartiality due to commercial, financial or other pressures.

4.3.3 The company's top management commits to Impartiality.

4.3.4 The Technical department requires internal and external auditors/examiners and external technical experts to commit to a written agreement to comply with the policies and procedures applicable to the certification body. The agreement contains provisions on confidentiality and independence from business and other interests, and requires internal and external auditors/examiners and external technical experts to explain to the certification body the current or previous relationship with the organization that may be inspected.

4.4 Impartiality management of certification audit

4.4.1 The company does not outsource audit/audit to the system and service consulting organization.

4.4.2 In order to ensure that there is no conflict of interest, personnel involved in the consultation of the customer management system (including management personnel), within three years after the completion of the consultation, the technical center shall not arrange its inspection or other certification activities for the customer.

#### 4.5 Impartiality management of certification decisions

In order to ensure the Impartiality of the certification decision, the personnel (including management personnel) who have consulted the customer management system are involved. Within three years after the consultation, the Technical Department shall not arrange for it to participate in the report review, certification review and decision activities for the customer. The certification decision personnel shall not participate in the report review, certification review and decision activities of the certification projects that they have reviewed.

#### 4.6 Impartiality management of appeal/complaint handling

At the time of appeal/complaint processing, the filing, investigation and decision of the appeal/complaint does not result in any discrimination against the appeal/complainant. The investigation, handling, and decision of the appeal/complaint shall be made by personnel unrelated to the appeal/complaint, and the appeal/notifier shall be notified of the result.

4.7 The Management Committee shall implement the Impartiality Management Committee Charter for the impartiality supervision and management.

4.8 Participating in the certification decision, engaging in the review or handling the appeals and complaints, must sign a "Impartiality and confidentiality statement" before the corresponding activities, commit to abide by the Impartiality and confidentiality rules, and proactively report between the person and the unit and the work target. Existing or potential administrative, economic, business and other interests, and bear legal responsibility for Impartiality-related commitments. Anyone who has a conflict of interest may voluntarily evade.

#### 4.9. Certification confidentiality management

##### 4.9.1 Scope of Confidentiality

4.9.1.1 Non public quality management system documents of the company in writing or electronically.

4.9.1.2 Various records of the company in writing or electronically.

4.9.1.3 Archives of certified personnel of the company.

4.9.1.4 Documents and information submitted by the applicant and the certified organization and information obtained during the audit review/verification process (exceptions that the applicant and the certified organization have disclosed).

4.9.1.5 Information about customers obtained from sources other than customers (such as complainants, regulators).

4.9.1.6 Company certification market development information.

4.9.1.7 Information on appeals and complaints accepted by the company.

4.9.1.8 Other technical and commercial information that requires confidentiality.

##### 4.9.2 Secret level

The secret level is divided into medium secret and high secret. Information within the scope of confidentiality specified in clause 7 of this document, if not stated or stated, is medium secret. If the secret level decisioner believes that it needs to be noted or stated, it is classified as high secret.

##### 4.9.3 Confidentiality measures

4.9.3.1 All kinds of documents, records, materials and information that need to be kept confidential shall be designated by a special person for management, properly preserved, and the

system of issuance, collection, carrying. borrowing. copying and citation shall be prescribed when applicable, and shall be included in public documents and publicly disclosed. The information of the network needs to be reviewed by the HR and approved by the management representative.

4.9.3.2 Non public quality system documents, records and information need to be provided to external organizations or personnel, subject to approval by the general manager. The specific product or information about the certification applicant and the certified organization requires the written consent of the owner to be available to third parties (unless legally restricted). When laws and regulations, accreditation norms, and international accreditation cooperation organizations require submission, the information required to be submitted by law, etc. should be notified to the owner when the documents are published.

4.9.3.3 Companies (including management committee personnel) who have the opportunity to enter the internal office and who are exposed to confidential information are required to sign a confidentiality guarantee.

4.9.3.4 Company personnel have the right to enter the company's internal office, read internal publications, non-public quality management system documents, local area network information, participate in designated internal meetings, and read documents and records related to assignment tasks.

4.9.3.5 High secret documents, records and information can only be transmitted, read, and discussed within the scope of authorization. If necessary, the name and access time of the visitor should be recorded.

4.9.3.6 In the public documents and at the first meeting of the inspection, the certification applicant and the certified organization are committed to confidentiality obligations, and explain the exceptions to the laws and regulations, the accreditation norms and the international certification cooperation organization.

4.9.3.7 During the audit process, the certification personnel can only record the audit evidence and related information on the specified record form. The records recorded by other carriers should be saved as audit file data after the inspection, or destroyed on the spot.

Note: During the audit process, important technical information of the organization, such as raw material formula, may only express the documents or record numbers and evaluation opinions of the technical information, and may not record the specific content of the technical information. If it is necessary to record the specific content of the technical information or request a copy of the technical information, it should be stored and carried in a sealed manner and handed over to the designated person of the client.

4.9.3.8 Company personnel shall not read or discuss information that needs to be kept confidential in public places, and do not privately listen to information that is not related to their own work.

4.9.3.9 Confidentiality requirements should be specified in the contractor agreement with the subcontractor.

#### 4.9.4 Violation of confidentiality regulations

4.9.4.1 Both internal and external personnel of the company have the right to report and report the leaked behavior to the company's confidential work department.

4.9.4.2 After verifying the situation by the competent department of confidentiality, in accordance with the provisions of the signed confidentiality agreement, the handling opinions shall be submitted and reported to the confidentiality work leader for approval.

4.9.4.3 If the violation of the provisions of this procedure, but does not result in leakage, Or has caused a slight degree of impact, such as criticism, warning, violation of the provisions of this

procedure, resulting in leakage, and serious impact on the serious treatment, such as Administrative sanctions, financial compensation, until legal liability.

4.9.4.4 The confidentiality department maintains a record of the results of the processing.

4.9.5 The company may disclose confidential information under the following circumstances

- a) obtain written consent from the accredited organization;
- b) Perform statutory responsibilities.

4.9.6 The following information is not within the confidentiality of AAPA:

a) Information published by the organization regarding the status of the accredited organization's accreditation, including details of accreditation, refusal of accreditation, suspension or revocation of accreditation, expansion or reduction of the scope of accreditation, and details of the scope of accreditation;

b) information that the applicant or the accredited organization has disclosed or should disclose;

c) Public information about the applicant or the accredited organization obtained by the agency from other legal sources.

<b>CHANGES TRACKING</b>	
<b>DETAILS OF CHANGES</b>	<b>DATE CHANGED</b>