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Policy on Impartiality FORM



INTEGRITY, CONFIDENTIALITY, AND ETHICS POLICY FOR EUROFINS FOOD ASSURANCE CERTIFICATION ACTIVITIES

Eurofins Food Assurance is committed to maintaining the highest levels of impartiality and independence in all our certification activities.

This policy outlines the systems in place to ensure an impartial decision-making, managing conflicts of interest, and ensuring transparency and trust in our processes.

Impartiality, independence, and confidentiality

Objective Decision-Making: Certification decisions are made solely based on objective evidence obtained during the audit process. These decisions are taken by personnel who have not participated in any auditing or consulting activities for the client, ensuring unbiased and impartial judgments.

Conflict of Interest Management: All employees and external personnel must disclose any potential conflicts of interest. We maintain and regularly update a comprehensive list of related entities to manage and mitigate any risks. This proactive approach helps safeguard the integrity of our certification process.

Separation of Duties: We ensure a clear segregation of duties to prevent any overlap between auditing, consulting, and decision-making roles. Certification personnel are distinct from those involved in consultancy services, maintaining the integrity of the certification process.

Staff commitment: Each person involved in Certification Activities on behalf of Eurofins Food Assurance commits to comply with its independence and confidentiality rules by signing a dedicated declaration. This includes any auditor, certification staff, technical expert, translator, impartiality committee members, certification bodies manager likely to have an impact on any part of the certification processes.

Confidentiality: Confidentiality agreements are signed by all employees and subcontractors. Client information is protected and only used for certification purposes, maintaining trust and integrity in our services.

Maintaining Impartiality and Integrity

Impartiality Committee: Each accredited certification body within Eurofins Food Assurance has an impartiality committee overseeing all activities likely to impact impartiality. These committees' reviews risks and ensures that all actions comply with our impartiality requirements, providing an additional layer of oversight. Their members are independent from the Certification Bodies staff and management and are allowed to take independent actions if they consider it necessary.

Training and Awareness: All personnel receive regular training on impartiality and conflict of interest management. Our training programs are continually updated to reflect changes in standards and best practices, ensuring our team is well-equipped to uphold our impartiality policy.

Monitoring and Evaluation: Internal and external audits are conducted to assess compliance with our impartiality policies. Continuous monitoring ensures that any issues are promptly addressed and mitigated, maintaining the integrity of our certification activities.

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Handling Complaints and non-conformities

Complaints Management: We have a clear procedure in place for handling complaints related to impartiality. All complaints are documented, investigated, and resolved transparently, ensuring accountability and trust. Any whistleblower can send a complaint to the Compliance Department (<u>FA.Compliance@cpt.eurofinseu.com</u>) which will conduct independent investigations.

Corrective Actions: If a complaint is upheld, appropriate corrective actions are taken to prevent recurrence. The Compliance department, oversees the implementation of these actions, ensuring continuous improvement in our processes.

Reporting to Certification Programme Owners: Eurofins Food Assurance will promptly inform relevant Certification Programme Owners (e.g., BRCGS, IFS, FSSC, GLOBALG.A.P.) of any issues that could affect the integrity of certifications. This ensures transparency and accountability in our certification processes.

Sanctions

Non-Compliance Consequences: Employees or external personnel who fail to disclose conflicts of interest or violate the impartiality policy will face disciplinary actions, including termination of employment or contract. Breaches of confidentiality agreements will result in legal actions and penalties as stipulated by contractual obligations and applicable laws.

Organizational Penalties: Eurofins Food Assurance will enforce sanctions on related entities that jeopardize the impartiality of our certification processes. Any actions or affiliations that undermine our impartiality will be subject to review and appropriate corrective measures.

Public Availability

This policy is publicly available on our website to ensure transparency and trust with our clients and stakeholders.

Eurofins Food Assurance General Manager

Mr. Christophe Liebon

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