

Independence Impartiality Confidentiality




Based on Requirements of
ISO/IEC 17020:2012

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Amendment Records

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1 Purpose

The purpose of this document is to define the process adopted to ensure that the results of the inspection remain independent and impartial and that the information obtained during the inspection remain confidential.

1.1 Scope

This document shall apply to all the QC Engineer for all the inspection activities carried out under the scope of this management system complying to ISO/IEC17020 for all projects of SgurrEnergy.

1.2 Responsibility

Table 1-1: Responsibility

Position	Responsibility
Quality Manager/ Technical Manager	<ul style="list-style-type: none"> • Ensure that the Conflict of Interest and Confidentiality statement is understood and signed by the QC Engineers.
QC Engineer / QC Engineer	<ul style="list-style-type: none"> • Understand and sign the code of conduct document at the initial / joining stage. • Understand and sign the Conflict of Interest and Confidentiality statement for every order executed. • Communicate to the TM operation / QM where you have any interest and accept every order to be executed only if there no conflict of interest.



2 Procedure

2.1 Independence, Impartiality

SgurrEnergy and all QC Engineers shall be independent from any commercial, financial and other pressures which have potential to affect their judgment and the results of the inspections carried out by them. Neither SgurrEnergy personnel nor the organizations external to SgurrEnergy should influence the results of the inspections carried out.

SgurrEnergy shall inform the client, in advance, of the information it intends to place in the public domain. Except for information when legally enforced, that the client makes publicly available, or when agreed between the SgurrEnergy and the client, all other information is considered proprietary information and shall be regarded as confidential.

The inspection activities shall be undertaken impartially by the SgurrEnergy.

Awareness shall be provided to inspection team to not accept favours (of any kind), and impartiality/confidentiality requirements.

Information about the client obtained from sources other than the client, such as complainant and regulators shall be treated as confidential.

The List of risk areas related to impartiality covers the risks based on:

- Ownership
- Governance
- Management
- Personnel
- Shared resources
- Finances
- Contracts
- Marketing
- Sales commission
- Activities of SgurrEnergy.
- Relations established by the SgurrEnergy in the market with associated bodies/persons, where the associated body/person has evident interest regarding bringing of inspection decisions or influences the process,
- Relations established by SgurrEnergy personnel:
 - Relationship with a parent organisation
 - Relationships with departments within the same organisation
 - Relationships with related companies or organisations
 - Relationships with regulators
 - Relationships with clients
 - Relationships of personnel
 - Relationships with the organisations designing, manufacturing, supplying, installing, purchasing, owning, using or maintaining the items inspected.

To report any previous and/or existing connections, both one's own or those of one's employer with:

- Product supplier or designer, or
- The one rendering or developing services,



- Those carrying out or developing processes for evaluation or inspection to which they have been appointed,

To reveal each situation known to them which can represent conflict of interest for them or for the SgurrEnergy.

The Contract with SgurrEnergy Personnel is a document which is filled in each year by all personnel / associates of the SgurrEnergy.

- Self-interest threats: -- Threats that arise from a person or body acting in its own interest to benefit itself.
- Self-review threats – Threats arising from a person reviewing the work that they have conducted themselves.
- Familiarity threats – Threats that arise from a person being familiar with or trusting of another person, e.g., an examiner or inspection body personnel developing a relationship with a candidate that affects the ability to reach an objective judgment.
- Intimidation threats – Threats that prevent an inspection body or its personnel from acting objectively due to fear of a candidate or other interested party.
- Financial threats - The source of revenue for an inspection body can be a threat to impartiality.

TMs/ QM shall ensure that SgurrEnergy or the QC Engineer shall not be amongst the owner, user or maintainer of the items under inspection nor the authorized representative of any of these parties. SgurrEnergy or its staff shall not engage in any activity that may conflict directly with the independence of judgment and integrity of inspection and its results.

The impartiality risks associated with the other activities of the organization, is reviewed and represented with specific practical situations.

All interested parties shall have access to the services of SgurrEnergy in non-discriminatory manner.

The data or information obtained during the process of inspection shall be handled confidentially.

The Inspection team personnel sign a contract document which contains the rules defined by the SgurrEnergy, including those related to impartiality & confidentiality and freedom from commercial and other interests;

2.2 Confidentiality

2.2.1 In carrying out its activities, SgurrEnergy (Inspection Division) obtains confidential information concerning individuals and / or organizations during its various inspection activities, which it carries out. SgurrEnergy places great importance on respecting the privacy of the individuals and / or organizations who use its inspection services. It has therefore introduced this procedure designed to protect user privacy. The information below provides an overview of M/s SgurrEnergy's commitment regarding privacy and confidentiality.

2.2.2 SgurrEnergy has established, documented this procedure for the maintenance and release of information with regards the ISO/IEC 17020 requirements to always keep and maintain confidential all information obtained during the inspection carried out. SgurrEnergy will not collect or use another party's confidential information without that party's permission.

2.2.3 Data Inputting and Transmission

2.2.3.1 The information that SgurrEnergy receives when an order and / or request for information is placed and is treated with the utmost confidentiality. SgurrEnergy



does not disclose the names of, or information on, individuals and / or organizations that are in contact with it.

2.2.3.2 The results of the inspections conducted by SgurrEnergy are transmitted by registered mail to the previously authorized persons. The inspection engineers do not give any results over the telephone, by fax or by e-mail.

2.2.3.3 Before discussing specific cases over the telephone, SgurrEnergy staff ask many questions to validate the caller's identity.

2.2.4 Employees & personnel

2.2.4.1 The handling of confidential information within SgurrEnergy is strictly limited to those employees and associates who require access to carry out their functions. Thus, during the hiring and recruitment process, SgurrEnergy performs checks on candidates' (both permanent employees and associates) employment history and background. These checks may include credit checks, criminal record checks, inquiries into their professional training and checks with former employers. Once hired, employees and associates must sign respective agreements with SgurrEnergy, which includes specific provisions regarding the confidentiality of information obtained during the inspection activity. During their employment/contract at SgurrEnergy, employees and associates are regularly reminded of the importance of respecting the confidentiality of information obtained during their duties.

2.2.4.2 SgurrEnergy shall inform the client, in advance, of the information it intends to place in the public domain. All other information, except for information that is made publicly accessible by the client, shall be considered confidential. SgurrEnergy shall not disclose any information about a particular certified client or individual to a third party without the written consent of the inspections conducted or individual concerned. When SgurrEnergy is required by law or authorized by contractual arrangements to release confidential information, the client or individual concerned shall, unless prohibited by law, be notified of the information provided. Information about the client from sources other than the client (e.g., complainants, regulators) shall be treated as confidential, consistent with this policy. Personnel, including any committee members, contractors, personnel of external bodies or individuals acting on the behalf of SgurrEnergy, shall keep confidential all information obtained or created during the performance of SgurrEnergy's activities except as required by law nationally and internationally.

2.2.5 QC engineers, associate QC Engineers and related Inspection activity personnel receive and handle confidential information e.g. Inspection results, observations, non-conformities, reports, certificates about clients, partners, and other things. This information is well-protected for two reasons:

- It is legally binding (e.g. sensitive customer data).
- It may serve as the backbone of our business, which gives us a competitive advantage (e.g. business processes, market secrets, etc.).
- It is as per the ISO 17020:2012 standard requirements.

SgurrEnergy's confidentiality procedure explains how employees and associates are expected to treat confidential information and consequences for inappropriate management of the same.

This procedure affects all employees, board members, investors, associates, in SgurrEnergy who have access to confidential information.



Confidential information should be kept discreet because it is valuable and often sensitive. It can also be easily pirated or replicated, which is dangerous for business.

“Confidential and or proprietary Information” shall mean and include any information disclosed by one Party (Disclosing Party- the Manufacturer, Supplier, Customer) to the other (Receiving Party- SgurrEnergy) either directly or indirectly, in writing, orally, by inspection of tangible objects (including, without limitation, documents, prototypes, samples, media, documentation, discs and code). Confidential information shall include, without limitation, any materials, trade secrets, network information, configurations, trademarks, brand name, know-how, business and marketing plans, financial and operational information, and all other non-public information, material or data relating to the current and/ or future business and operations of the Disclosing Party and analysis, compilations, studies, summaries, extracts or other documentation prepared by the Disclosing Party. Confidential Information may also include information disclosed to the Receiving party by third parties on behalf of the Disclosing Party.

Confidential information includes, though not limited to:

- Inspection Observations, calculations, results, reports, Certificates
- Unpublished financial information
- Data of customers/partners/suppliers
- Patents, formulas, or work technologies
- Contact list for current and prospective customers
- Data from external parties entrusted to SgurrEnergy
- Pricing and marketing strategies
- Documents and processes that are explicitly classified as confidential
- Unpublished targets and business plans marked as confidential

Employees and contract Personnel should remember to:

- Keep confidential information locked at all times.
- Shred confidential documents once they are no longer needed
- View confidential information only on secure devices
- Disclose confidential information to other employees only when it is necessary and authorized
- Retain confidential documents within the company premises all the time unless there is a compelling reason to move them
- Soft copies- under protected folders, sometimes, under password protection.
- Computers and Laptops and associated Software (if used) should be password protected.
- Log-in ID and Passwords to be used.

Employees should NOT:

- Use confidential information to advance a personal agenda.
- Disclose confidential information to persons outside the company.



- Store copies of confidential documents and files on insecure devices.

2.2.6 Protection of Confidentiality Data

To ensure confidential information is well protected, SgurrEnergy will:

- Store and lock paper documents
- Encrypt electronic information and safeguard databases through Log-in ID and Password protection
- Get our employees sign non-compete or non-disclosure agreements
- Condition access to confidential data on approval by senior management

Exceptions

Examples of legitimate grounds to disclose confidential information include:

- If a regulatory body requests it as part of a routine audit or legal investigation
- If SgurrEnergy enters into a venture or partnership that requires disclosure of some information (within the legal framework)

In these cases, employees concerned should document the specific information that is needed and seek authorization. SgurrEnergy should always be careful not to disclose more information than what is needed.

Where the QC Engineer / Associate QC Engineer feels confidentiality is breached the following steps will be taken:

- The QC Engineer / Associate QC Engineer should raise the matter immediately with Quality Manager.
- The QC Engineer / Associate QC Engineer must discuss with the QM / TM-Operations the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. QM / TM-Operations should take a written note of this discussion.
- QM / TM-Operations is responsible for discussing with the Inspector what options are available in each set of circumstances.
- QM / TM-Operations is responsible for making a decision on whether confidentiality should be breached. If QM / TM-Operations decides that confidentiality is to be breached, then they should suitably inform the client representative.

2.2.7 Prospects of Disciplinary Action

Employees and Contract Personnel who defy the confidentiality policy will face disciplinary action, which may also entail legal action.

SgurrEnergy will always investigate any breach of the procedure and:

- Terminate employees who wilfully and regularly breach the guidelines for personal gain.
- Take action even for unintentional breaches of this procedure depending on frequency and seriousness.
- The procedure and its contents are binding to employees even after leaving employment.



2.3 Undertaking from QC Engineers

The above controls are achieved by ensuring that the QC Engineer's sign the relevant code of conduct and agreements.

The TM Operation / QM shall ensure that all the inspectors have thoroughly understood the then signed the Confidentiality Statement and Conflict of Interest Declaration.

Confidentiality Statement Form No: P12 F01 shall be signed by the QC Engineer. Conflict of Interest Declaration form no: P12 F02 shall be signed by the QC Engineer every time that he is assigned a new client / new scope / new vendor and order.

2.4 Records keeping

The record generated out from code of conduct, shall be kept in the personal file of the employee.

The record generated out of form no P12 F01 and form no P12 F02 shall be kept in the relevant job file.

TM Operation / QM shall maintain the records of these signed undertakings.



3 Records

Table 3-1: Records

Record	Record Reference	Retention Period
Confidentiality Statement	P12F01	3 Years from the date the employee leaves SgurrEnergy.
Conflict of Interest Declaration	P12F02	3 Years after the inspection.
Risk Register	Annex C of Quality Manual	Permanent

