

公正性与保密声明

Impartiality and Confidentiality Statement

根据《中华人民共和国产品质量法》、《中华人民共和国认证认可条例》、《认证机构管理办法》及相关认证认可标准、规范的要求，钛和认证(上海)有限公司(以下简称“本机构”)是具有法人资格、独立承担民事责任、为社会各界提供认证服务的第三方认证机构。

In accordance with the requirements of the "Product Quality Law of the People's Republic of China", the "Regulations of the People's Republic of China on Certification and Accreditation", the "Administrative Measures for Certification Bodies", and relevant certification and accreditation standards and specifications, Ti Certification (Shanghai) Co., Ltd. (hereinafter referred to as "this organization") is a third-party certification body with legal personality, independently assuming civil liability, and providing certification services to all sectors of society.

为保证认证工作的公正性、有效性和保密,本机构特作如下声明:

To ensure the impartiality, effectiveness and confidentiality of certification work, this organization hereby makes the following statement:

一、公正性管理及承诺 Impartiality Management and Commitment

1.1 本机构充分理解公正性对认证活动的重要性，识别和管理可能的利益冲突，确保认证活动的客观、公正。本机构的《公正性与保密声明》可公开获取。

This organization fully understands the importance of impartiality to certification activities, identifies and manages potential conflicts of interest, and ensures the objectivity and impartiality of certification activities. This organization's "Impartiality and Confidentiality Statement" is publicly available.

1.2 利益冲突分析与威胁消除 Conflict of Interest Analysis and Threat Mitigation

- 本机构通过对认证活动引起的利益冲突可能性的分析和识别，制定了《认证风险控制程序》，以确定可能引起利益冲突(包括潜在的)的各种威胁；

Through analysis and identification of the possibility of conflicts of interest arising from certification activities, this organization has established the "Certification Risk Control Procedure" to identify various threats that may cause conflicts of interest (including potential ones);

- 本机构将采取相应的措施，消除或最大限度的减少各类威胁(包括因其他个人、机构或组织的行为构成对公正性的威胁)；

This organization will take corresponding measures to eliminate or minimize various threats (including threats to impartiality arising from the actions of other individuals, bodies or organizations);

- 本机构对利益冲突识别过程及采取的相应措施予以记录；

This organization records the conflict of interest identification process and the corresponding measures taken;

- 本机构向公正性委员会提交利益冲突分析及威胁消除措施，以供审议；

This organization submits conflict of interest analysis and threat mitigation measures to the Impartiality Committee for consideration;

1.3 本机构要求所有人员及时报告任何了解的可能使其个人或本机构陷入利益冲突的情况，并根据识别、分析结果采取措施应对可能会对本机构公正性产生威胁的利益冲突。在利益冲突未消除前，本机构不会使用相关人员参与任何认证活动。

This organization requires all personnel to promptly report any situation known to them that may present themselves or this organization with a conflict of interest, and takes measures to address conflicts of interest that may threaten this organization's impartiality based on the results of identification and analysis. Before a conflict of interest is resolved, this organization will not use the relevant personnel to participate in any certification activities.

1.4 开展审定与核查活动时，如对同一客户既提供审定又提供核查服务，本机构将充分考虑对公正性的潜在威胁(例如，自评和熟识)，并进行相应管理。

When conducting validation and verification activities, if providing both validation and verification services to the same client, this organization will fully consider potential threats to impartiality (e.g., self-review and familiarity) and manage them accordingly.

1.5 本机构确保所有可以影响认证/审定/核查活动的人员或委员会公正行事，且不受可能影响认证结论的任何商业、财务和其他方面的压力。

This organization ensures that all personnel or committees that may influence certification/validation/verification activities act impartially and are not subject to any commercial, financial or other pressures that may affect certification conclusions.

1.6 本机构对认证/审定/核查活动引发的风险进行了评价，针对可能引发的责任风险，本机构已建立保险保障机制，通过购买认证认可责任保险，对相关风险予以充分保障。

This organization has evaluated the risks arising from certification/validation/verification activities. To address potential liability risks, this organization has established an insurance protection mechanism and fully covers relevant risks by purchasing certification and accreditation liability insurance.

1.7 本机构确保具有一个能够按照合同规定的义务持续提供服务的合理财务预期。机构以管理评审/财务审计报告等证据，向公正性委员会证实本机构的公正性不受任何商业、财务或其他方面压力的损害。

This organization ensures a reasonable financial expectation to be able to continue providing services in accordance with contractual obligations. The organization demonstrates to the Impartiality Committee, through evidence such as management review/financial audit reports, that the organization's impartiality is not compromised by any commercial, financial or other pressures.

1.8 本机构在认证活动中严格按照《认证机构管理办法》开展认证工作，严格执行 CCAA《认证机构公平竞争规范》及相关认证认可标准、规范的要求，承诺与其他认证机构展开公平竞争，确保认证全过程公正、公平，以品牌、信誉、质量、服务为主要竞争手段，着力提高认证的有效性。

This organization strictly conducts certification work in accordance with the "Administrative Measures for Certification Bodies" and strictly implements the requirements of the CCAA "Fair Competition Code for Certification Bodies" and relevant certification and accreditation standards and specifications. It commits to fair

competition with other certification bodies, ensures impartiality and fairness throughout the certification process, uses brand, reputation, quality and service as its main competitive means, and strives to improve the effectiveness of certification.

二、业务边界与独立性. Business Scope and Independence

2.1 本机构保证机构内部、其他个人、关联机构或组织的活动不会影响认证/审定/核查活动的可信性、客观性和公正性。本机构(包括所属的法律实体的其他部分) 不提供:

This organization ensures that activities within the organization, by other individuals, affiliated bodies or organizations do not affect the credibility, objectivity and impartiality of certification/validation/verification activities. This organization (including other parts of the legal entity to which it belongs) does not provide:

- 可能对公正性构成不可接受威胁的认证;
Certification that may pose an unacceptable threat to impartiality;
- 对另一认证机构进行管理体系认证;
Management system certification to another certification body;
- 管理体系认证咨询等主动或被动地咨询服务;
Proactive or reactive consulting services such as management system certification consultancy;
- 推荐管理体系认证咨询或提供管理体系认证咨询报价;
Recommendations for management system certification consultancy or provision of quotations for management system certification consultancy;
- 对获证组织管理体系进行内部审核。
Internal audits of the management systems of certified organizations.

2.2 本机构(包括所属法律实体的其他部分) 不充当:

This organization (including other parts of the legal entity to which it belongs) does not act as:

- 获证产品的设计者、制造商、安装者、分销者或维护者;
Designer, manufacturer, installer, distributor or maintainer of certified products;
- 获证过程的设计者、实施者、操作者或维护者;
Designer, implementer, operator or maintainer of certified processes;
- 获证服务的设计者、实施者、提供者或维护者;
Designer, implementer, provider or maintainer of certified services;

2.3 本机构(包括所属法律实体的其他部分) 在审定与核查活动不对同一客户的同一宣称同时提供咨询和审定/核查服务;

This organization (including other parts of the legal entity to which it belongs) does not simultaneously provide consultancy and validation/verification services for the same claim of the same client in validation and verification activities;

2.4 本机构不与任何咨询机构存在资产利益、管理利益、人员利益关系, 不将审核外包给管理体系认证咨询机

构。当提供咨询服务的机构和本机构的关系表现出对公正性存在不可接受的威胁时，本机构不对宣称提供过咨询的客户开展审定与核查活动，也包括预先约定的潜在客户。

This organization does not have any asset interests, management interests, or personnel interests with any consultancy organizations, and does not outsource audits to management system certification consultancy organizations. When the relationship between a consultancy organization providing services and this organization presents an unacceptable threat to impartiality, this organization will not conduct validation and verification activities for clients to whom consultancy has been provided, including pre-agreed potential clients.

2.5 本机构的市場开发或报价与管理體系认证咨询机构的活动无联系。当管理体系咨询机构宣称或暗示选择本机构将使认证简单、容易、迅速或廉价时，本机构将立即制止，并向中国国家认证认可监管部门报告。本机构自身亦不宣称或暗示选择某咨询机构将使认证简单、容易、迅速或廉价。

This organization's marketing or quotations are not linked with the activities of management system certification consultancy organizations. When a management system consultancy organization states or implies that choosing this organization will make certification simpler, easier, faster or less expensive, this organization will immediately stop it and report it to the China National Certification and Accreditation Regulatory Authority. This organization itself also does not state or imply that choosing a particular consultancy organization will make certification simpler, easier, faster or less expensive.

三、保密承诺 **Confidentiality Commitment**

3.1 本机构遵守有关保密规定，维护委托方或受审核/审定/核查方的合法权益，本机构保密范围如下：

This organization complies with relevant confidentiality regulations and safeguards the legitimate rights and interests of clients or audited/validated/verified parties. The scope of confidentiality of this organization is as follows:

- 遵守国家法律、法规要求的保密范围：严格履行数据安全与网络安全法律责任，依据《数据安全法》和《网络安全法》等法律法规的规定，对认证活动中收集、生成的信息和数据在境内实施本地化存储管理；
Scope of confidentiality required by national laws and regulations: Strictly fulfill legal responsibilities for data security and network security, and implement localized storage management within the territory for information and data collected and generated during certification activities in accordance with the provisions of laws and regulations such as the "Data Security Law" and the "Cybersecurity Law";
- 认证/审定/核查活动中所知悉的国家机密、商业机密和技术机密；
State secrets, commercial secrets and technical secrets learned during certification/validation/verification activities;
- 委托方或受审核/审定/核查方在经营、管理、技术方面的信息(委托方或受审核/审定/核查方已公开、或与委托方或受审核/审定/核查方商定公开的文件和信息，以及法律法规要求披露的除外)；
Information on the operations, management, and technology of the client or audited/validated/verified party (excluding documents and information that have been made public by the client or audited/validated/verified party, or agreed to be made public with the client or audited/validated/verified

party, as well as information required to be disclosed by laws and regulations);

- 从其他来源(如投诉人、监管机构)获得的关于客户的信息对客户保密, 该信息的提供者(来源) 应按保密信息处理, 未经提供者同意, 不应与客户分享;

Information about the client obtained from other sources (e.g., complainants, regulatory bodies) is kept confidential from the client; the provider (source) of such information shall be treated as confidential, and shall not be shared with the client without the provider's consent;

- 已签订认证/审定/核查合同或约束性协议的有关信息和通过认证/审定/核查前的进度访问动态;

Information related to signed certification/validation/verification contracts or binding agreements, and progress visit dynamics before passing certification/validation/verification;

- 认证审核/审定/核查过程的文件、资料、记录。

Documents, materials, and records of the certification audit/validation/verification process.

3.2 本机构承诺, 对所有在认证/审定/核查过程中获得的信息(无论涉及委托方或受审核/审定/核查方) 予以严格保密, 未经法律许可或信息所有方同意, 不得向任何第三方披露。

This organization commits to strictly keeping confidential all information obtained during the certification/validation/verification process (whether involving the client or the audited/validated/verified party), and not disclosing it to any third party without legal permission or the consent of the information owner.

3.3 前条规定的保密义务, 在以下情形中不适用: 应法律、国家认证认可监督管理部门、认可机构、中国认证认可协会或其他有权政府部门的正式要求, 需要本机构提供与认证/审定/核查相关的信息或与认证有关的审核资料时。

The confidentiality obligation stipulated in the preceding clause does not apply in the following circumstances: when this organization is required to provide information related to certification/validation/verification or audit materials related to certification upon the formal request of laws, the national certification and accreditation regulatory authorities, accreditation bodies, the China Certification and Accreditation Association, or other competent government departments.

3.4 委托方或受审核/审定/核查方有权提出必要的保密、禁入区域等方面要求, 并要求审核人员执行保密承诺。

The client or audited/validated/verified party has the right to propose necessary requirements regarding confidentiality, restricted areas, etc., and to require audit personnel to implement confidentiality commitments.

承诺单位: 钛和认证(上海) 有限公司

法人代表: 郑希俊

总经理: 杨坤

Undertaking Party: Ti Certification (Shanghai) Co., Ltd.

Legal Representative: Zheng Xijun

General Manager: Eric