

<b>BASE SPA</b> Direction inspections, controls and sampling	<b>DECLARATION OF COMMITMENT TO IMPARTIALITY          INDEPENDENCE CONFIDENTIALITY</b>	Rev. 00 Pag. 1 of 2 28/12/2021
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"BASE SPA - Inspections, Controls and Sampling Directorate" is an **Inspection Body (Odl) of type A that operates in compliance with the UNI CEI EN ISO / IEC 17020 standard**

#### GIVEN THAT

**Impartiality** is defined as the presence of objectivity, i.e. that there are no conflicts of interest or that these have been resolved in such a way as not to adversely affect the consequent activities of "BASE SPA - Directorate of Inspections, Controls and Sampling" (other terms that are useful to convey the concept of impartiality are: independence, absence of conflict of interest, absence of partiality, absence of prejudice, neutrality, honesty, open-mindedness, fairness, detachment, balance).

"BASE SPA - Inspections, Controls and Sampling Department" believes in the importance of fundamental values such as impartiality and integrity in carrying out its periodic verification activities, to convey trust and credibility to all stakeholders involved in the inspection process. To this end, the SO has developed its Management System in accordance with the applicable ACCREDIA rules and regulations, respecting the best interests of the parties involved, the protection of the market and the principles of competence, responsibility, transparency, speed and effective response to complaints.

"BASE SPA - Control and Sampling Inspections Department" keeps the Risk Analysis updated for the prevention of conflicts of interest, in order to guarantee impartiality in carrying out inspection activities and compliance with its internal procedures.

On the basis of the Analysis method, all possible risks and opportunities that emerge from the study of the professional experiences of all the personnel involved in the inspection activity, including the relationships with the processes in which they are involved, are examined and documented.

The Board of Directors (in short also the Board of Directors) can access at any time all the offers and contracts of "BASE SPA - Control and Sampling Inspections Department": the Board of Directors is required to communicate and / or report any situation in which the risk of a potential conflict of interest may be configured to safeguard impartiality.

"BASE SPA - Direction inspections, controls and sampling":

- prepares a tariff in which the economic criteria for the formulation of offers and any discounts are reported, the application of which does not discriminate against any Customer;
- defines specific and clear contractual conditions for the offer of the inspection service, supported mainly by a Regulation of the inspection activity and secondarily by procedures for managing the commercial process;
- prepares specific declarations of commitment to confidentiality, independence and safeguarding impartiality, which the internal and / or external Inspectors accept at the time of the contract / assignment, as prescribed by the Code of Ethics of "BASE SPA - Control and Sampling Inspections Department".

The inspection staff, therefore, thus provide sufficient guarantees to demonstrate also the absence of conflicts of interest and the freedom from commercial and financial constraints or pressures that may influence its decisions on the outcome of the inspections carried out.

"BASE SPA - Direction inspections, controls and sampling":

- ensure that technical and inspection staff are not remunerated on the basis of the number of inspections carried out or the results thereof;
- allows the Customer to reject, with appropriate and documented reasons, the Inspector to whom the Odl has assigned the inspection;
- does not offer or provide, even through outsourcing to external consulting firms, consultancy services of any kind;
- ensures the confidentiality of all information collected in the course of carrying out its activities and the protection of property rights;
- conducts a Management Review, at least annually, to verify the level of quality and the progress of the inspection activity, as well as the skills of the personnel who carried them out;
- undertakes to have a balanced customer portfolio with the aim of ensuring absolute autonomy and total independence of judgment;
- guarantee free access to the procedure for handling complaints, reports and/or appeals, and undertakes to provide them with rapid and duly substantiated responses;
- does not carry out activities that may conflict with the inspection service provided, such as, by way of example: purchase, sale brokerage, storage, transport, selection, disposal of the products subject to Inspection;
- does not cooperate with third-party companies that may enter into a conflict of interest with the inspection services provided.

In addition, also making use of the support of its Substitutes, it plans and performs a periodic monitoring of the entire group of Inspectors of "BASE SPA - Control and Sampling Inspections Directorate", in order to evaluate the maintenance of their regulatory knowledge and technical skills.

The processes described in the company management system of "BASE SPA - Inspections, Controls and Sampling Department" are subject to internal inspections, carried out annually by Resp. AQ, in order to ensure the compliance of the inspection activities with the requirements of the Odl, which is also subject to at least one first-party audit carried out by internal auditor of "BASE SPA" or by qualified external auditor, in accordance with the requirements of the *UNI EN ISO 9001: 2015* standard. In the light of all the above,

#### DECLARES THAT

"BASE SPA - Inspections, Controls and Sampling Department" is committed to impartiality in carrying out its inspection activities, in the management of any conflicts of interest and in the guarantee of objectivity in its inspection activities.

La Directorate of Inspections, Controls and Sampling of BASE SPA

recognizes the importance of the principles of impartiality, independence and confidentiality in the performance of its primary inspection activities as a Type A Inspection Body - third party - in order to guarantee all interested parties, being totally independent of the object of the inspection, a service without prejudice and with an outcome that is based on objective evidence of compliance.

The Inspection and Sampling Department of "BASE SPA" undertakes to carry out other service activities only if they do not conflict with the inspection activity.

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The Control and Sampling Department of BASE SPA transmits, for acknowledgment and acceptance, to the corporate structure and to all its staff and to the figures involved in the activity of BASE SPA as Odl its commitment to guarantee impartiality, independence and confidentiality.

The Control and Sampling Department of BASE SPA advertises on its website, through this document (last revision carried out), this declaration of commitment to guarantee impartiality, independence and confidentiality.

The Directorate of Inspections, Controls and Sampling of BASE SPA with this declaration undertakes:

- to guarantee the IMPARTIALITY of the inspection activities, or to carry out the activity with the utmost professional integrity and necessary technical competence;
- inspection activities shall be carried out impartially and no commercial, financial or other pressures which could compromise impartiality shall be permitted;
- the remuneration and staff involved in the activity shall not affect the results of the inspections;
- BASE SPA continuously identifies the risks of its impartiality, including those risks arising from its activity or from the relations and of its staff;
- if a risk to impartiality is identified, BASE SPA must be able to eliminate or minimize the risk;
  
- to guarantee INDEPENDENCE
- the Inspection Body undertakes to maintain all the conditions of independence and to meet the minimum requirements established by the UNI CEI EN ISO / IEC 17020/2012 standard;
- The remuneration of the personnel involved in the inspection activities shall be independent of the number and duration of the inspections carried out;
- The respective representative of BASE SPA has the operational responsibility of the business unit dedicated to maintenance and has no operational responsibility for periodic verification activities
  
- to guarantee CONFIDENTIALITY
- BASE SPA is responsible for the management of all information obtained or produced during the execution of inspection activities;
- BASE SPA undertakes to indicate to the customer any information it intends to make public;
- all the information is considered confidential, with the exception of information that the customer makes available to the public, or for those of which the same gives explicit consent;

The Control and Sampling Department of BASE SPA also undertakes to:

- carry out constant monitoring on aspects that affect the trust and reliability of inspections through a check on the main indicators (non-conformities, complaints, etc.);
- carry out constant monitoring of the education, training-training, technical knowledge, skills, experience and authorisation of each member of its staff involved in the inspection activities, recording the results;
- make available human, instrumental and economic resources, aimed at pursuing the objectives of improvement by promoting any action aimed at protecting the health of human resources, both in the management of headquarters activities and in the management of the services provided;
- to comply with applicable and signed laws, regulations and other requirements;
- ensure training and awareness-raising activities for all operational staff;
- maintain the requirements of accreditation as an Inspection Body type "A" in accordance with UNI CEI EN ISO / IEC 17020

Periodically, the Inspection and Sampling Department of BASE SPA formulates objectives and targets for continuous improvement of company performance, communicating them to all interested parties,

All the staff of the Inspection Body of BASE SPA is required to act in accordance with the principles described in this policy, disseminated and illustrated to all personnel.

Livorno 28 December 2021

The Sole Director