

Independence, Impartiality, Integrity and Security Policy

The Inspection Body is part of the organization, constituting an identifiable but not separate part of CAPGEMINI ENGINEERING, developing its activities based on general principles of integrity, independence, impartiality, confidentiality, objectivity and technical competence. To achieve this, CAPGEMINI ENGINEERING employs as many economic, technical and human resources as necessary, through the implementation of control mechanisms for its activities and the risks related to them, the establishment of performance criteria and the implementation of preventive and corrective measures in the event of possible deviations.

The Inspection Body of CAPGEMINI ENGINEERING is competent to carry out the activities detailed in the scope documents.

The conformity assessment system followed by CAPGEMINI ENGINEERING to carry out the inspection process, as well as its Quality Management System and its operation, are designed to meet the requirements of the UNE-EN ISO/IEC 17020 standard and guarantee impartiality, independence and integrity at all levels of the organization.

This Policy has been approved by CAPGEMINI ENGINEERING's Management in order to align it with the business objectives and create a framework for action in accordance with the following criteria:

- In relations with clients or potential clients, no person from CAPGEMINI ENGINEERING or its subcontractors will make any comments that might suggest to them that the inspection would be simpler, easier or less costly if certain consultancy services were contracted.
- There will be a clear dissociation of tasks between those performed in the inspections and other activities, ensuring an adequate segregation of roles and responsibilities between the inspection and other activities that the organization may perform.
- No inspector shall participate in an inspection process of an item if he has participated in the design/ manufacture/ provision/ installation/ service/ maintenance of the item.
- Inspectors shall have as a priority objective the achievement of the safety objectives of the products/facilities/processes being inspected.
- In no case shall the remuneration obtained for the inspection activities be affected by the results thereof.
- Inspection work shall not be assigned to subcontractors who have been involved, directly or through their company, in the process of design, implementation or maintenance of the element (product/process/service) to be inspected.
- Any inspector or technical expert, whether in-house or subcontracted, when assigned an inspection, shall declare any circumstances that could generate a conflict of interest with the organization being evaluated.
- The personnel involved in the inspections are committed to keep professional secrecy regarding the information obtained in the development of their inspection activities in order to guarantee the rights of the clients over the property and confidentiality of the data.
- The information or data obtained by CAPGEMINI ENGINEERING, concerning a product or client, will not be disseminated in any way to third parties, without the written consent of the client involved.
- Whenever it is required by law that any information be disclosed to a third party, CAPGEMINI ENGINEERING will inform the client of the information to be provided, provided that the law allows it.

- All personnel, including subcontractors, must be aware of the criteria listed here prior to the start of their duties.

CAPGEMINI ENGINEERING's Management appoints a 17020 Evaluation Committee for each of the defined scopes as the maximum responsible for the establishment, implementation, maintenance and compliance assurance of the Management System, appointing the Quality Director as their representative.

The 17020 Evaluation Committee is, therefore, in charge of maintaining this Policy, as well as providing the necessary support for the correct implementation of the system in the organization.

In addition, the 17020 Evaluation Committee will establish periodically the objectives of the system and will be responsible for providing the necessary resources for the compliance of these objectives, as well as to start the monitoring and control activities of the processes.

Any new activity in the defined areas that CAPGEMINI ENGINEERING may initiate will be analysed to assess potential conflicts of interest and their impact on compliance with this Policy, so that if it poses an unacceptable threat to the impartiality declared here, it will not be carried out.

Any person whose activity may, directly or indirectly, be affected by the requirements of the inspection activities set forth herein, is obliged to strictly comply with this Policy, and its use without due authorization for other purposes is prohibited.

We will make this Policy available to all interested parties in order to contribute to the continuous improvement and effectiveness of inspection activities.

The Independence, Impartiality, Integrity and Security Policy set forth herein comes into effect upon the signing of the document, is communicated and understood at all levels of the organization, and has the full commitment and support of CAPGEMINI ENGINEERING's Management, which establishes, implements and reviews it annually through the Management System Review process in order to adapt it to the needs of the clients and the purposes of the organization.

December 19th, 2024



Laurent Perea, Managing Director of Capgemini Engineering Spain
Capgemini España, S.L.