

Independence, Impartiality, Integrity and Safety Policy

The Inspection Body is integrated into the organization, constituting an identifiable but not separate part of CAPGEMINI ENGINEERING, carrying out its activities based on general principles of integrity, independence, impartiality, confidentiality, objectivity and technical competence. To achieve this, CAPGEMINI ENGINEERING uses all economic, technical and human resources 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 CAPGEMINI ENGINEERING Inspection Body is competent to carry out the activities detailed in the scoping 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 according to the following criteria:

- In our dealings with customers or prospective customers, 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 expensive if certain consulting services were contracted.
- There will be a clear dissociation of tasks between those carried out in inspections and in other activities, ensuring an adequate segregation of functions and responsibilities between the inspection and other activities that may be carried out by the organization.
- No inspector shall participate in an inspection process of an item if he or she has been involved in the design/manufacture/supply/installation/service/maintenance of the item.
- The inspectors will have as a priority the achievement of the safety objectives of the products/facilities/processes subject to inspection.
- In no case shall the remuneration obtained for inspection activities be affected by their results.
- Inspection work will not be assigned to subcontractors who have been involved, directly or through their company, in the process of designing, implementing or maintaining the element (product/process/service) to be inspected.
- Any inspector or technical expert, in-house or subcontracted, when assigned an inspection, must declare any circumstance that could generate a conflict of interest with the organization evaluated.
- The personnel involved in the inspections undertake to maintain professional secrecy with respect to the information obtained in the development of their inspection activities in order to guarantee the rights of customers regarding the ownership and confidentiality of the data.

- The information or data obtained by CAPGEMINI ENGINEERING, concerning a product or customer, will not be disseminated in any way to third parties, without the written consent of the customer concerned.
- When required by law to disclose any information to a third party, CAPGEMINI ENGINEERING will inform the client of the information to be provided, to the extent permitted by law.
- Any person of CAPGEMINI ENGINEERING, in-house or subcontracted, who detects pressures of any kind that they consider may negatively influence the outcome of an inspection process, will report it to the Technical Director or Quality Director for their knowledge and decision-making.
- All personnel, including subcontractors, must be aware of the criteria indicated herein, prior to the start of their duties.

The Management of CAPGEMINI ENGINEERING appoints an Evaluation Committee 17020 for each of the defined scopes as the maximum responsible for the establishment, implementation, maintenance and assurance of compliance with the Management System, appointing in turn the Quality Director as their representative.

Evaluation Committee 17020 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.

Likewise, the 17020 Evaluation Committee will periodically establish the objectives of the system and will be responsible for providing the necessary resources for compliance with them, as well as for implementing the monitoring and control activities of the processes.

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

Any person whose activity may, directly or indirectly, be affected by the requirements of the inspection activities established 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 so that, together, we can contribute to the continuous improvement and effectiveness of inspection activities.

The Independence, Impartiality, Integrity and Safety Policy set forth herein comes into force as of the signing of the document, is communicated and understood at all levels of the organization and has the full commitment and support of the Management of CAPGEMINI ENGINEERING, who establishes, applies and reviews it annually through the Management System Review process in order to adapt it to the needs of customers and to the needs of the clients. the purposes of the organization.

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Óscar Arias Elguezabal, Head of Industry of Capgemini Engineering Spain
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