

Kaixin Certification (Beijing) Co., Ltd.

凯新认证（北京）有限公司

Certification of sustainable of textile procedure

可持续发展纺织品认证程序文件

Impartiality Management Procedure

公正性管理程序

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management procedure

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1. Purpose/目的

In order to ensure the impartiality of the management system certification and effectively control the factors that may affect the impartiality of the certification work, this procedure is formulated in accordance with the relevant requirements of the accreditation regulation./为确保管理体系认证的公正性，对可能影响认证工作公正性因素进行有效控制，根据认可规范有关要求制定本程序。

2. Duty/职责

2.1 The general manager of the KCB is fully responsible for the impartiality of the whole certification process./公司总经理对认证工作全过程的公正性全面负责；

2.2 The technical Department is responsible for the formulation and implementation of specific impartiality management measures. The management representative supervises the execution of all departments and personnel./技术部负责制定并落实具体公正性管理措施；管理者代表监督各部门和全体人员的执行；

2.3 All departments and personnel shall ensure the implementation of the requirements of fair management of the company./各部门和全体人员确保切实执行公司公正性管理各项要求；

2.4 The Impartiality Management Committee shall supervise the formulation and implementation of the impartiality policy./维护公正性管理委员会对公正性政策的制定和实施进行监督。

3. Management requirement/管理要求

3.1 KCB has identified and controlled the following factors affecting the impartiality of the certification work:/公司对下列影响认证工作公正性的因素进行了识别控制：

No./ 序号	Factors that affect impartiality/对公正性的威胁因素
1	Ownership of certification body/ 认证机构所有权
2	The corporate governance structure of the certification body, that is, it can influence the operation of the body, and all parties may intervene in the activities to affect the impartiality/认证机构的法人治理结构，即：对机构的运作可以产生影响，各方面对活动可能进行干预，影响公正性
3	Management of certification body/认证机构管理层及管理方式
4	The personnel of the certification body may have economic or interest relations with the certification activities or their certification objects, which may form a potential threat/认证机构人员可能与认证活动或其认证对象存在经济或利益的关联，形成潜在威胁
5	Certification bodies may derive from Shared resources, that is, having operations other than certification, resulting in a reduction in impartiality/认证机构可能源自共享资源，即有除认证之外业务，造成公正性的降低
6	The fairness of income certification. That is, the organization receives internal and external financial support or pressure/认证收入的公正性；即机构在财务方面获得内外部支持或压力
7	The contract fees of certification bodies, depending on the importance of the client, pose a potential threat to impartiality/认证机构的合同收费，因客户重要性不同，而产生潜在公正性的威胁
8	Certification body may derive from the selling and marketing of competitive means, a potential threat to impartiality/认证机构可能源自营销和市场的竞争手段，潜在公正性方面的威胁



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3.1.1 Before the annual management review, the management representative shall organize the heads of all departments to conduct impartiality identification and analysis and evaluation, and form the risk analysis and evaluation record and risk analysis and evaluation report, which shall serve as the input of management evaluation./ 管理者代表在年度管理评审前组织各部门负责人进行公正性识别和分析评价, 形成风险分析评价记录及风险分析评价报告, 作为管评输入。

3.1.2 The Technical Department shall be responsible for organizing the impartiality review before holding the annual meeting of the Impartiality Maintenance Committee, forming the impartiality analysis and audit report, and submitting it to the annual meeting of the Impartiality Maintenance Committee for approval./技术部负责在召开年度维护公正性委员会会议前, 组织公正性评审, 形成公正性分析审核报告, 提交年度维护公正性委员会会议审批。

3.2 Control of consulting activities/对咨询活动的控制

3.2.1 When accepting the application for certification, the Company shall take the following measures to ensure that there is no one-stop service of certification and consultation:/ 公司在接受认证申请时, 采取下列措施确保不搞认证和咨询一条龙服务:

- a) Make a clear commitment in the public documents not to provide consulting services, not to have a partnership with any consulting institution, nor to imply that the applicant will be certified or be beneficial to the certification if he/she chooses a consulting or training institution./在公开文件中, 作出明确承诺, 不提供咨询服务, 也不与任何咨询机构有合作关系, 更不暗示申请方若选择某家咨询或培训机构, 则可通过认证, 或对认证有好处;
- b) Reject any request for consultation from the applicant in the process of negotiating the certification contract./在洽谈认证合同过程中, 拒绝申请方任何方式的咨询要求;
- c) Independently sign the certification contract without any consulting issues related to certification./独立签署认证合同, 不涉及任何与认证有关的咨询问题。

3.2.2 The Company makes the following provisions on the possible consulting behaviors of certification auditors:/ 公司对认证审核人员可能的咨询行为作如下规定:

- a) The auditor of KCB shall not engage in certification consulting activities in any name./公司审核员不得以任何名义从事认证咨询活动;
- b) The auditor of KCB shall not assist the enterprise in internal audit or consulting matters related to certification audit upon its request./ 公司审核员不得应企业要求为其协助内审或有关认证审核的咨询事宜;
- c) Auditors shall not participate in the certification audit activities conducted by enterprises that have consulted for them within two years./审核员在两年内不得参加曾为其提供过咨询的企业进行认证审核活动。

3.2.3 The KCB's certification audit does not carry out subcontracting. If the work requires the establishment of a subcontract agency, its responsibilities shall be clearly stipulated and reported to the authorized body for record, and shall be brought into the management scope of the KCB's quality system, including the implementation of internal audit./ 公司认证审核不实行分包。如工作需要建立外派机构时, 应明确规定其职责报国家认可机构备案, 并纳入公司质量管理体系管理范围内, 包括实施内审。

3.2.4 KCB and any relevant department shall not provide internal audit to the KCB's licensed customers./公司及任何相关部门不得向公司的获证客户提供内部审核

3.3 Control of unfair competition behaviors in market development/在市场开发中, 对不正当竞争行为的控制

3.3.1 The company shall disclose its recognized business scope to the applicant in the public document or before



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signing the certification contract, and shall not mislead the applicant./在公开文件中或签署认证合同前，应向申请人公开公司认可业务范围，不得造成误导；

3.3.2 Strictly implement the certification fee standard stipulated by KCB, no high fees or low price competition./严格执行公司规定的认证收费标准，不准高收费或压价竞争。

3.3.3 It is strictly prohibited for anyone to give kickback or referral fees to the certification applicant or his/her referrer in any name, nor to attract certification customers by such means./严禁任何人以任何名义给认证申请人或其介绍人回扣或介绍费，也不准以此种手段招徕认证客户；

3.3.4 It is not allowed to be linked with the consulting institution and give certification referral fees or commission to the consulting staff./不准与咨询机构挂钩，给予认证介绍费或给予咨询人员好处费；

3.3.5 The Company shall disclose its financial status to accreditation body and accept their impartial supervision./公司向认可机构公开其财务状况，并接受其公正性监督。

3.3.6 KCB does not allow any link or statement from KCB or any consulting agency to claim or imply that the selection of the KCB will make certification easier, easier, faster or cheaper. If found, KCB will take immediate action to correct it./公司不允许公司及任何咨询机构的链接或声明宣称或暗示选择本公司将使认证更为简单、容易、迅速或廉价，如发现，公司将立即采取措施纠正。

3.4 The Company shall ensure that it is not for profit, shall not produce or supply certified products, shall not commit to contracting economic indicators and certified quantity, and shall not allow any staff to contract economic indicators and certified quantity for any reason./公司确保不以营利为目的，不搞承包经济指标和认证数量承诺，也不允许任何工作人员以任何理由进行经济指标和认证数量的承包。

3.5 All the staff of the company must strictly implement the code of conduct for staff, among which auditors shall strictly observe four points when performing audit tasks:/公司所有人员必须严格执行工作人员行为规范，其中审核员在执行审核任务时，严格做到四个不：

- a) Do not accept gifts or money./不收受礼品、礼金；
- b) Do not accept securities or jewelry./不收受有价证券和珠宝首饰；
- c) Don't attend the banquet arranged by the enterprise./不收受有价证券和珠宝首饰；
- d) Do not participate in the entertainment activities arranged by the enterprise./不参加企业安排的娱乐活动。

3.6 The Company has established procedures to prevent or reduce the threat of conflicts of interest. Any actual or perceived interest that causes or ostensibly causes a personal, organizational, or professional interest is considered a conflict of interest. In particular:/公司已制定程序以防止或减少利益冲突的威胁。任何引起或表面上引起个人、组织或职业利益的实际或感知的利益都被认为是利益冲突。特别是：

a) KCB shall require KCB's employees, auditors, board members, IC members, marketing personnel and their near relatives to declare existing or prior association they and their relatives with an organization subject to certification. Where such an association threatens impartiality, the certification body shall exclude the person concerned from work, discussion and decisions at all stages of the certification process related to the potential conflict of interest./ KCB 应要求人员、审核员、公正性委员会、成员和市场人员申报自己及其直系亲属与受认证组织已有或之前的联系。如果这种关联威胁到公正性，认证机构应将有关人员排除在与潜在利益冲突有关的认证过程的所有阶段的工作、讨论和决定之外。

b) if a conflict of interest between certification personnel and an organization is found after an audit has occurred, another unbiased person shall be assigned to determine if it has affected the certification process and to



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complete the remainder of the process if applicable.如果在审核后发现认证人员与组织之间存在利益冲突，则应指派另一名公正的人员来确定该冲突是否影响到认证过程，并在适用的情况下完成该过程的剩余部分。

c) An individual auditor shall not audit the same organization in more than three consecutive years./一个单独的审核员对同一组织的审核，不得连续三年以上。

d) The declaration of conflict of interest document "KCB-QR049 Statement of Impartiality and Confidentiality" shall be signed by KCB's employees, auditors, IC members, marketing personnel and shall be updated periodically at least on an annual basis as well as prior to a new above mentioned personnel join KCB, or any report on change/unscheduled update of potential conflict of interest. / 利益冲突声明文件“KCB-QR049 公正性和保密声明”应由 KCB 的员工、审核员、公正性委员会成员、市场人员签署，并应至少每年定期更新，并在新上述人员加入 KCB 前，或任何关于潜在利益冲突的变更/计划外更新。

e) The product Managers and Management representative are responsible for evaluation and maintenance of records and report to General Manager to decide on appropriate corrective actions to be implemented if necessary. 产品经理和管理者代表负责评估和维护记录，并向总经理报告，以决定必要时采取的适当纠正措施。

f) Product Managers and the Human Resources Department are required to keep the originally signed conflict of interest declaration on the personal file of the related personnel. / 产品经理和人力资源部门被要求保持原来签署的利益冲突声明相关人员的个人档案。

3.7 Analysis of the KCB's financial position/公司财务状况分析

3.7.1 The Financial Department of KCB shall prepare the annual financial analysis report at the end of each year. The report shall analyze the financial situation of the whole year, including the income type, income source, customer source and operation status, etc. The financial analysis shall be specific to determine whether KCB is under commercial, financial or other pressure through analysis./ 公司财务部于每年年底编制年度财务分析报告，报告需对全年财务情况进行分析，包括收入种类、收入来源、客户来源、经营状况等的分析，财务分析需具体，通过分析确定公司是否存在商业、财务或其他方面的压力。

3.7.2 During the annual meeting of the committee on Maintenance of impartiality, the Finance Department shall submit the financial analysis report for the review of the Committee. It has been confirmed that the impartiality of the company has not been damaged by commercial, financial and other pressures./每年的维护公正性委员会会议时，财务部需提交财务分析报告供维护公正性委员会评审，已证实公司的公正性没有受到商业、财务和其他方面压力的损害。

4. Supervisory activities of the Commission for the Maintenance of Impartiality/

维护公正性委员会的监督活动

4.1 In order to ensure the impartiality of the KCB's certification activities, KCB has established a impartiality supervision organization -- The Impartiality Maintenance Management Committee./为确保公司认证活动的公正性，公司建立了公正性监督机构——维护公正性管理委员会。

4.2 Maintenance impartiality management committee and its members shall have the right to supervise the impartiality of certification activities of the company when KCB market development structure and organization structure has greatly changed, the part of the response to changes in risk assessment, a comprehensive analysis of problems affect the impartiality of, take measures to prevent, to maintain impartiality committee review at the same time, the specific requirements see the file of maintain fairness committee charter./维护公正管理委员会及



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其成员有权对公司认证活动的公正性进行监督，当 KCB 市场开发结构以及组织结构等发生重大变化时，应对变化的部分进行风险评估，全面分析影响公正性的问题，采取措施加以防范，同时提交维护公正性委员会评审，具体要求详见《维护公正性委员会章程》。

5. Relevant document/相关文件

KCB-TF05 Charter of impartiality safeguarding committee
《KCB -TF 维护公正性委员会章程》

6. relevant records/相关记录

KCB-QR021 Conflict of interest identification Result Report form
KCB-QR022 Impartiality review report
KCB-QR023 Assessment Form for Risk Analysis of Certification Activities (Annual)
KCB-QR024 Impartiality analysis report approval form
KCB-QR049 Statement of Impartiality and Confidentiality

Annex/附录

Modification

Modified page	Modified status	Modified content	Person	Date
3	Valid	Section 3.2.1 was deleted and the section numbers were readjusted	SYB	2021/8/5
4	Valid	Add "relatives" to section 3.6	SYB	2021/8/5
4	Valid	Added “KCB's employees, auditors, board members, IC members, marketing personnel and their near relatives ” Section 3.6 (a)	SYB	2022/2/11
5	Valid	Added section 3.6 d), f).	SYB	2022/2/11
6	Valid	Added “KCB-QR049 Statement of Impartiality and Confidentiality” in section 6	SYB	2022/2/11
5	Valid	Added section 3.6 e)	Jack Ge	2022/2/11