

BRIGHTSIGHT CERTIFICATION BODY QUALITY AND IMPARTIALITY POLICY

SGS Brightsight, has more than 40 years of experience in the cybersecurity sector, providing its clients with quality services that meet mutually agreed requirements. That is why we strive to continually improve our services without compromising the trust, fairness, judgment and integrity of our activities.

One of the activities carried out by SGS Brightsight is the IT Security Products Certification, in conformity with the ISO/IEC 17065 and ISO/IEC 17021 standards and in accordance with the specific requirements of the corresponding schemes that aim to protect the availability, authenticity, integrity, confidentiality and traceability of the information stored, transmitted or processed through said products, processes and services throughout its life cycle. Said activity is carried out by SGS Brightsight Certification Bodies (hereinafter the Certification Bodies).

The Certification Bodies are committed to deliver good professional practice and results (measured in quality, time and costs). Employees are encouraged to identify, share and solve nonconformities or mistakes to learn and continue working on continuous improvement.

The Certification Bodies recognizes the importance of maintaining confidentiality, independence and impartiality, managing conflicts of interest that may arise and ensuring objectivity in the accredited conformity assessment activities carried out by the Certification Bodies themselves. Therefore, all Certification Bodies personnel, including the management team, undertake to comply with the SGS Code of Integrity and Professional Conduct, the summary of which is as follows:

- *Not giving way to clients' pressures in any of our business fields with the aim of obtaining favorable treatment in another sector.*
- *Do not accept a position or employment from a competitor or Company client, except in the performance of their duties in SGS.*
- *Do not have any participation in a supplier, client or competitor of SGS, except for publicly traded securities whose limit may not significantly affect or create an excessive reliance.*
- *Do not accept a position or any employment outside SGS without having obtained previous authorization.*
- *Do not accept any personal benefits, for themselves or relatives, which may influence or seem to influence their judgment or actions while performing their duties for SGS.*
- *Do not gain any personal benefit from SGS trade opportunities, as well as not using the property or company resources for personal purposes.*
- *Refrain from disclosing any confidential facts that may come to their knowledge during the performance of their duties.*

In accordance with the above, in those cases in which the conducted activities may involve an impartiality risk analysis will be undertaken, and measures will be established to eliminate or minimize such risks in accordance with the requirements established by the relevant accreditation bodies.

The Certification Bodies operating procedures apply, in a non-discriminatory manner, to all the parties interested involved in the services requested.

At the same time, to avoid any conflicts of interest, Certification Bodies personnel, including the management team, will be free from any commercial, financial or any other pressures that may affect their judgment, for which sufficient controls have been established:

- Do not hold business shares from companies or bodies involved in the results of the activities undertaken or work for or obtain remunerations from them.*
- Do not solicit or accept personal benefits that, due to their nature or value, influence or appear to influence that person's judgment when such a person performs their functions.*
- The remuneration of the staff of the Certification Bodies is not related to the number of tests or activities carried out and, in no case, to their results.*

The Certification Bodies shall not outsource audits or other certification activities to management system consultancy organizations, as such arrangements constitute an unacceptable threat to impartiality. Where external auditors or technical experts are used, they shall be engaged as individuals and shall be subject to the Certification Bodies' controls regarding competence, confidentiality, independence, and impartiality.

Recognizing the importance of ensuring that Management has no commercial interests in any of the carried-out activities, the Certification Bodies require from all its Managers to declare any economical or financial activity other than those directly related to their work in the Company.

The Certification Bodies have full authority in relation to its activity, and it is completely independent of any other business or service provided by rest of SGS.

Furthermore, SGS Brightsight will commit themselves to monitor the issuance of documents, advertising material or commercial presentations that associate their services with those rendered by the rest of SGS Companies, avoiding any suggesting about their activities been related or may influence on the provided services or undertaken activities, thus reducing the impartiality risk and prevent that any conflicts of interests may occur.

SGS Brightsight has committed to carefully analyze any new activity to evaluate their possible impact on the compliance with the National Accreditation Body requirements that may apply in each case.

The content of this policy is mandatory throughout the Certification Bodies.

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*Sergio Casanova
Chief Technology Officer*