



MANAGEMENT POLICY ON IMPARTIALITY

Top Management of PT TSI Sertifikasi Internasional is committed to ensuring impartiality by:

1. Conducting the certification process free from any pressure, whether arising from commercial activities or financial aspects.
2. Controlling risks related to impartiality through identification, analysis, monitoring, evaluation, and documentation of risks, whether they originate internally or from external parties.
3. Refraining from providing certification services when there is a threat to impartiality (e.g., certification service requests from subsidiaries of PT TSI Sertifikasi Internasional).
4. Ensuring that shareholders, directors, auditors, experts, external resources (subcontractors), committees, and individuals involved in certification services have a strong commitment to impartiality, as demonstrated by their willingness to sign the "Declaration of Non-Conflict of Interest" and an integrity pact.
5. Guaranteeing that shareholders, directors, and all employees have no affiliations or relationships with other companies engaged in ISO consulting.
6. Ensuring that all personnel or committees involved in certification services act professionally in maintaining impartiality.
7. Ensuring that selected auditors and/or experts have no relationships with the clients being certified or have had at least a two-year gap since their last employment with the client.
8. Ensuring that personnel involved in an organization's certification do not provide in-house management system training (such as training, workshops, or seminars) on behalf of the certified organization or any part of the same legal entity that leads to consultancy activities or bias.
9. Will not provide management system certification services to other certification bodies.
10. Will not outsource the audit process to a management consulting organization.
11. Will not certify the management system of a client that has received:
 - Management system consultancy from an entity affiliated with PT TSI Sertifikasi Internasional.
 - In-house management system education services (such as training, workshops, or seminars) that lead to consultancy activities or impartiality concerns from PT TSI Sertifikasi Internasional.
 - Energy-related services from PT TSI Sertifikasi Internasional or TSI personnel. Unless these activities occurred at least two (2) years before or after the certification period.



12. Will not offer or provide internal audit services (2nd party audit) or internal reviews to clients under PT TSI Sertifikasi Internasional's certification services or within two (2) years after the last service.
13. Will not delegate certification audit services to consulting organizations; however, PT TSI Sertifikasi Internasional may use individually contracted personnel.
14. Ensures that it will not be marketed or promoted as the same entity as an organization providing management system consultancy.
15. Ensures to rectify any improper links or statements made by any consulting organization that suggests or implies that certification will be simpler, easier, faster, or cheaper if PT TSI Sertifikasi Internasional is used.
16. Will not state or imply that certification from PT TSI Sertifikasi Internasional will be simpler, easier, faster, or shorter if a particular consulting organization is used.
17. Ensures to take action to address any threats to its impartiality arising from the actions of individuals, entities, or organizations.
18. Ensures that shareholders, directors, auditors, experts, external resources (subcontractors), committees, and individuals involved in certification services must act impartially and must not allow commercial, financial, or other pressures to compromise impartiality.
19. Will always respond to any threats to impartiality arising from certification service activities by conducting direct interviews with relevant parties to obtain concrete evidence.
20. Ensures that Auditors and/or Experts will not accept any gifts or offerings from clients to maintain impartiality.
21. Will comply with anti-bribery regulations and other related laws and will evaluate compliance with anti-bribery legal requirements.
22. Will fulfill the obligation to report/provide any required information if mandated by regulations and/or requested by authorities or relevant parties.
23. Ensures that shareholders, directors, auditors, experts, external resources (subcontractors), committees, and individuals involved in certification services have no relationships with clients that could create potential bias.
24. Ensures that the location or address of PT TSI Sertifikasi Internasional is not used for the activities of other companies.
25. Ensures that prospective clients located in the same building have no affiliations with PT TSI Sertifikasi Internasional (ownership, governance, management, personnel, shared resources, and finances).
26. Ensures that auditors and/or experts remain impartial and free from involvement or influence that may affect their objectivity, and specifically must not:



- a. Be involved in the design, manufacture, construction, marketing, installation, servicing, or supply of medical devices, or related components and services.
 - b. Be involved in the design, construction, implementation, or maintenance of the general quality management system requirements being audited.
 - c. Act as an official representative of the client organization or represent parties involved in these activities.
27. Ensures that auditors and/or experts have no financial interest in the audited client organization (e.g., holding shares in the organization).
28. Ensures that auditors and/or experts:
- Do not work for a manufacturer that produces similar or competing medical devices.
 - Are not staff members of a research or medical institution or consultants with commercial contracts or equivalent interests with the manufacturer or similar medical device manufacturers.
29. Ensures that auditors provide added value during the certification and surveillance process without being considered as engaging in consulting activities or creating potential conflicts of interest.

Top Management will review this policy if, in the future, any potential impartiality issues are identified.

Jakarta, 30 December 2024