Brilliant Certification Entrance 1, El Mehwar El Markazy, Building #24 District 1, Area 2, El Sheikh Zayed City, Egypt

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## "Impartiality Policy"

BRILLIANT CERTIFICATION understands the impact and possible influence that can be exerted on us as an organization or on our staff. With this in mind BRILLIANT took a conscious decision to be and always remain unbiased at all times of the verification process. This is displayed in all BRILLIANT interactions before, during and after the verification process.

Every staff member of the verification team is required to disclose known relationships with the measured entity in order for BRILLIANT to manage the possible impartiality or conflict of interest.

In order to remain impartial BRILLIANT always strives to;

- Constantly educate and make all staff members aware of all possible threats of conflict of interest that can arise during verification
- · Continuously monitor and identify possible threats to our impartiality and guard against such threats
- · report such threats to authorities responsible for taking further actions, both internally and externally
- ensure that all management and staff are aware of the confidentiality agreements BRILLIANT has with the clients
- empower management staff to take immediate actions against any staff or client who act in a way that undermines BRILLIANT's position on impartiality
- demand that all staff declare any relationship that they may have which can result in breaching the conduct on impartiality and or confidentiality with clients or business partners
- Constantly provide BRILLIANT staff with necessary support in reporting and cooperating with authorities when reporting incident(s) which are threats to BRILLIANT's impartiality

Areas considered possible conflict of interest and therefore possible breach of Impartiality policies are as follows, but not limited to:

- allowing to be influenced by the client(s), client's representative, or any third party before, during or after verification process
- · having economic interest, direct or indirect, in the measured entity being submissive to client(s) pressures
- · allow the client(s) to influence the outcome of the verification process
- Failure to disclose known relationship(s) that might influence one's judgment during verification process
- verifying a company that has received advice by any of our staff members in the previous 2 years from date of receipt of application
- verifying a company were BRILLIANT staff member worked for in the previous 2 years from the date of receipt of application
- BRILLIANT may decline the services of a particular audit are offered. The same audit/inspector(s) are not
  permitted to undertake audit/inspections/inspections on more than three consecutive occasions at the same
  site.
- verifying a company that has legal influence (decision making powers in terms of voting rights) over BRILLIANT or
- verifying a company where BRILLIANT staff member/s have decision making powers in (has voting rights)
- verifying a company where their staff member/s are directors of BRILLIANT
- verifying a company where BRILLIANT members are also directors of the measured entity
- verifying a company where BRILLIANT or its management and staff have financial interest through financial loans (Any financial loan that can benefit either the rated entity or BRILLIANT and or its staff).

Managing Director Yasser Farouk 10 October, 2020

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