

### 1.0 Purpose 目的

This procedure establishes and defines the methods used to safeguard confidentiality of the information obtained in CSR audit activities at all levels of the organization, including committees and external bodies or individuals acting on behalf of **CSR Certification & Solutions Limited** (hereinafter called "CSRS").

### 2.0 Scope 范围

This procedure extends to all employees and contractors of **CSR Certification & Solutions Limited** audit operations with respect to any information presented by the client or discovered in **CSR Certification & Solutions Limited** audit operations, except for the information which is required to be disclosed in the published lists of certification approvals or which is required by an appropriate Accreditation Body.

### 3.0 Responsibility 职责

3.1 Operation Manager is responsible for:

- Ensuring that all **CSR Certification & Solutions Limited** employees have signed a "Statement of Confidentiality"
- Ensuring that all subcontractors (auditors and technical experts) have signed a "Statement of Confidentiality"
- Maintaining records of "Statement of Confidentiality"

3.2 Auditing Manager is responsible for ensuring that confidentiality of client information and data is maintained. Where the law requires information to be disclosed to a third party, the Technical Manager will inform the client of the information provided, as permitted by the law.

### 4.0 Procedure 程序

#### 4.1 Statement of Confidentiality 保密性声明

##### 4.1.1 Employees 员工

Every **CSRS** employee is required to sign a statement of confidentiality prior to commencement of their employment. These statements are maintained in the permanent personnel record and are

available for review by appropriate authorities.

#### 4.1.2 Subcontractors 外包商

Every **CSRS** audit subcontractor will be required to sign a statement of confidentiality prior to commencement of any work on behalf of **CSRS**. These statements will be maintained in the individuals file and be available for review by appropriate authorities. Confidentiality clauses will be included in contracts between **CSRS** audit operations and suppliers of personnel or services (i.e., temporary clerical personnel, legal services, duplication services, etc.) when these suppliers could be exposed to confidential client information.

#### 4.2 Information Control 资讯控制

4.2.1 All information and data received by **CSRS** from a client or auditee while engaged in audit activities will be treated as confidential and will not be disclosed to any third party without the prior written consent of the client or auditee. This applies to all employees and contractors of **CSRS** with respect to any information presented by the client/auditee or discovered by **CSRS** (e.g., auditors and/or technical experts); except for the information which is required to be disclosed in the published lists of certification approvals or which is required by an appropriate Accreditation Body. Where the law requires information to be disclosed to a third party, the client or auditee will be informed of the information provided, as permitted by the law.

#### 4.3 Documentation Control 文件控制

4.3.1 All **CSRS** audit documentation should be treated as confidential and will not be disclosed to any third party without the prior written consent of client/ auditee. Care shall be exercised at all times to ensure that only staff with a "need to know" or administrative responsibility have access to records containing client data. The files may only be removed from **CSRS** offices by authorized assessment personnel. Client information sent to and retained by subcontracted auditors and technical experts in connection with audit operations, shall be returned to **CSRS** when their responsibilities are complete.

#### 4.4 Confidentiality Complaints 保密性投诉

Any parties can raise confidentiality related complaints or appeals to CSRS, accreditation bodies, and/or the governmental regulatory bodies.

任何组织或个人发现本认证机构或本认证机构人员有违反有关保密性所规定的情况，均可向本公司投诉，或向认可机构投诉，或直接向监管机构、国家认可委/国家认监委投诉。

## **5.0 Records and Reports 记录和报告**

### **5.1 Impartiality, Confidentiality and Anti-Bribery Agreement 公正、保密和反腐败协议**

