

POLICY STATEMENT

by

The Senior Management of Type Xa Inspection Body KEY DIFFUSION with KEY
DIFFUSION Ltd.

on

MAINTAINING TYPE Xa STATUS OF THE INSPECTION BODY

The policy of TYPE Xa INSPECTION BODY (IB) KEY DIFFUSION WITH KEY DIFFUSION LTD., Sofia, on maintaining its impartiality status as required by BSS EN ISO/IEC 17020: 2012, Appendix A, is based on the following principles:

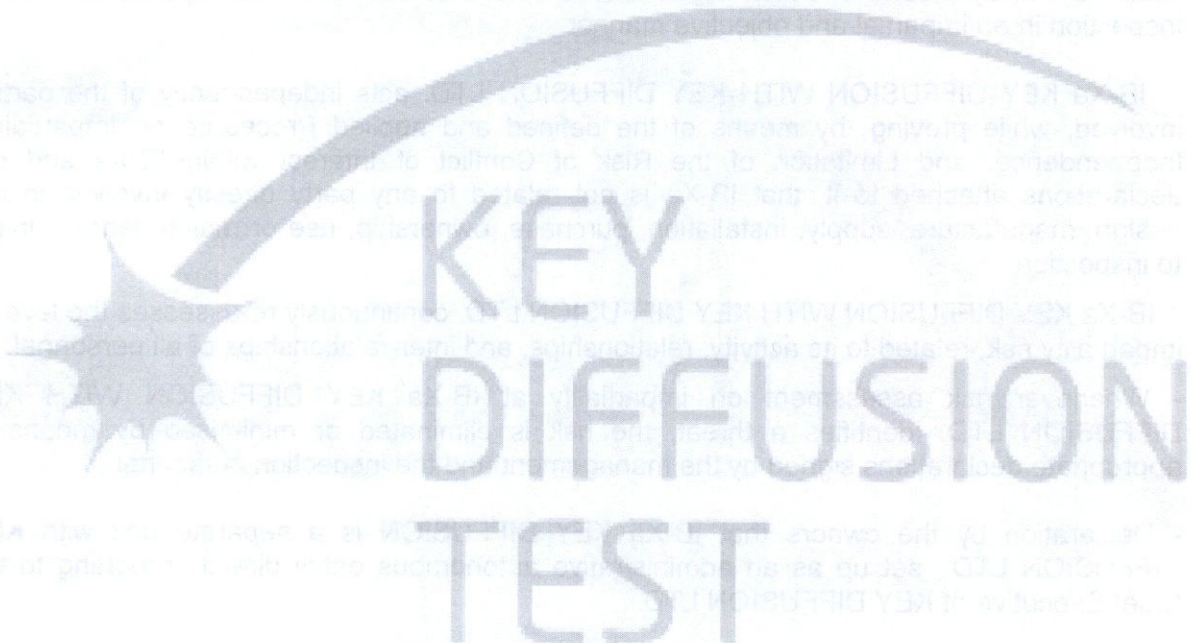
- IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD. has defined and conforms to a Procedure on Impartiality, Independence, and Limitation of the Risk of Conflict of Interest within IB-Xa, by means of which it guarantees before its customers its capacity to perform inspection in an impartial and objective manner.
- IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD. acts independently of the parties involved, while proving, by means of the defined and applied Procedure on Impartiality, Independence, and Limitation of the Risk of Conflict of Interest within IB-Xa and the declarations attached to it, that IB-Xa is not related to any party directly involved in the design, manufacture, supply, installation, purchase, ownership, use or maintenance subject to inspection.
- IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD. continuously re-assesses the level of impartiality risk, related to its activity, relationships, and inter-relationships of all personnel.
- Whenever risk assessment on impartiality at IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD. identifies a threat, the risk is eliminated or minimised by means of appropriate declarations signed by the management and the inspection personnel:

 - Declaration by the owners that IB-Xa KEY DIFFUSION is a separate unit with KEY DIFFUSION LTD., set up as an administrative autonomous entity directly reporting to the Chief Executive of KEY DIFFUSION LTD.
 - Declaration by the Chief Executive that IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD. is a completely autonomous body performing inspection, documenting results in reports, and issuing certificates.
 - Declarations by IB's management and inspection personnel of ownership of Ltd.- or Single-member-private-liability-type companies by them or by their relatives in a direct line of descent.
 - Declaration by IB's management and the inspection personnel of ownership of shares in public limited liability companies, providing opportunities to influence company decision-making.
 - Declaration by IB's management and the inspection personnel of participation in other organisations in their capacity of managers or managing board members.

- Declaration by the inspection personnel of their employment and non-employment relationships other than those with IB.

In the event of identified conflict of interest of a certain employee of IB-Xa KEY DIFFUSION, the management of IB-Xa KEY DIFFUSION WITH KEY DIFFUSION LTD shall take immediate steps and shall, if necessary, remove this person from the inspection for which conflict of interest has been established.

The management of TYPE Xa INSPECTION BODY KEY DIFFUSION WITH KEY DIFFUSION LTD., Sofia, declares that the policy of maintaining a type Xa inspection body ensures their level of independence in conformity with the requirements of БДС (Bulgarian State Standard) EN ISO/IEC 17020:2012, Appendix A .



Chief Executive of Type Xa Inspection Body

Paulina Parvanova