

Impartiality Policy

Issue No: 02.2	Issue Date: 05/03/2025	Effective Date: 01/04/2025
Author: Cathryn Cooper, Head of Assurance	Approval: Dan Kent, VP Quality EMEA	Authorised: Matt Hopkinson, EVP EMEA, Ops Board Lead for Quality

- Element Material Technology believe it is fundamental to maintain the trust and confidence of our clients, regulators, and the public and we are committed to delivering our products and services with impartiality, objectivity, and fairness. This means maintaining our independence, managing conflict of interest, protecting confidentiality, and operating with transparency and ethically.
- The General Manager (or equivalent) for each location shall ensure that the requirements for safeguarding of impartiality for the activities conducted in that location are defined, documented, communicated, and understood by all relevant persons.
- The General Manager (or equivalent) for each location shall ensure:
 - responsibilities for safeguarding impartiality have been identified, established, and instructed.
 - procedures to manage impartiality and conflict of interest are documented to cover all processes and are implemented and maintained to ensure activities and services are not compromised due to commercial or financial pressure and are delivered impartially and objectively.
 - the offer of services and activities are fair and not limited or impeded based on undue financial conditions, membership to a group or association or other such restrictions.
 - all relevant roles are trained on managing and understanding threats to impartiality.
 - all relevant roles identified as relevant have a written agreement committing themselves to comply with impartiality requirements.
 - that risks to impartiality, including conflict of interest, from activities and services, relationships with bodies and personnel are identified, eliminated, minimised or managed. Such risks and controlling measures are reviewed on an ongoing basis.
 - there is a mechanism to report any known issues where impartiality could be compromised.
 - action is taken to respond to any threat to impartiality arising from the actions of an individual, body or organisation. Any such action shall be documented and analysed.