亿科检测认证有限公司	审核	复核		批	批准	
Eqo Testing and Certification Co., Ltd	& of its	· 中世 表			A 5	
保密性管理规	 编号	EQO-CP22				
Confidentiality Manage	版本	A1	密级	中		

1 目的 Purpose

遵照有关法律法规,对公司在认证活动中获得的信息保密,以保护受审核方或委托人的权益及维护公司的信誉。We assure all information got from assessment process will be kept absolutely confidential, for protecting supplier and application's right and interest and also company's reputation.

2 范围 Scope

本规定适用于公司所有人员(含公正性委员会委员、以公司名义工作的外部人员)。This document is applicable to all EQO staff (Member of the safeguarding impartiality Committee, work in the name of EQO).

3 职责 Responsibility

公司总部及分场所负责实施, 相关主管人员有责任保证本规定的有效执行。All EQO staff should keep this document be carried out smoothly.

4 规定Provision

- 4.1 需保密的信息包括: Following information must be keep confidential.
- a) 申请人提交的资料及文件; Submitted material and document of application.
- b) 审核中所获取的有关信息、不符合项报告、审核报告及相关记录; Reference information, non-conformity report, assessment report and reference record.
- c) 申请人要求进行保密的信息; Application required information.
- d) 本公司管理体系文件及有关的信息; our company's document and reference information.
- e) 不是来自于客户(例如投诉者或法规管理者)有关客户的信息Other information not from customer, such as complainer and legal supervisor
- f) 涉及保密的其他信息。Other information related the confidentiality
- 4.2 保密信息分级: Classification of confidential information

保密信息根据需保密程度,涉及范围及泄密影响性,划分为高密、中密、一般三类。Confidential

information is classified into three categories: high secrecy, medium secret, and general secret, according to the degree of confidentiality required, the scope involved, and the impact of leakage.

高密: 只限于使用人员、管理人员、除法律法规要求,不得提供任何第三方。

High secret: For users and managers only, no third party may be provided except for legal requirements.

中密: 所有使用人员, 当外部有要求需要获取时, 需要经总经理批准后提供。

Middle secret: All employees are required to obtain the approval from the general manager when there is a requirement for external access.

一般:全体员工需要了解,当外部有要求需要获取时,需要经管理者代表批准后提供。

General secret: All employees need to understand that, when external requirements require access, they need to be approved by the person responsible for quality.

公司内部人员信息(含审核员、管理人员、技术专家等)、审核档案信息(含申请评审、审核方案管理、审核现场资料、受审核方申报资料等)属于高密信息,公司程序文件、作业指导文件等为中密信息,公司管理手册、接收外来文件、内部公告通知文件、宣传资料等为一般保密信息。Company internal personnel information (including auditors, managers, technical experts, etc.), audit file information (including application review, audit program management, audit site materials, auditee declaration materials, etc.) belong to high secret, Documents and other information belong to middle secret, company management manuals, external documents received, internal announcement notice documents, publicity materials, etc. belong to general confidential information.

电子类型保密信息应参照EQO-CP17《电子化文件管理程序》进行管理。Important confidential information and general confidential information shall be implemented in accordance with the provisions of articles 4.3 to 4.5 of this document; Electronic type confidential information should be managed in accordance with the EQO-CP17<electronic document control procedure>.

- 4.3 保密安排Arrangement of confidentiality
- 4.3.1 □□总部及分场所,应妥善保管4.1的文件、资料与记录,并将其放置在专属文件柜内,任何人不得抄录复制,也不得在任何场合以任何方式扩散和传播。EQO headquarters and site offices should be properly kept 4.1 documents, materials and records, and place them in the appointed file cabinets, nobody can copy or diffuse and spread in any way on any occasion
- 4.3.2 非认证活动需要,未经批准,所有人员不得将需保密的信息私自从工作场所带出。Without approval, all staff shall not be allowed to carry confidential information out from workplace, except for assessment need.
- 4.3.3 进行现场审核时,审核组组长应向受审核方申明公司的保密规定。Assessor leader shall declare company's confidential rules to customer when perform on-site assessment.

- 4.3.4 审核组所有成员,在现场审核中借用的各类文件和资料,待审核结束必须全数还清,不得留做他用。To all assessors, all materials and documents used in assessment activity shall be returned after on-site assessment, can't be used for other purpose.
- 4.3.5 审核组所有成员,在现场审核时不得以个人名义向受审核方索取任何文件和资料。

to all assessors, can't request any document and material in name of personal.

4.3.6 对认证审核所了解的受审核方管理及技术资料严格保密。

keep confidential for all management and technical document of customer.

4.3.7 在体系记录的管理和处理过程中应注意资料的保密性。

keep confidential for information when input in EQO work system

- 4.3.8 审核组组长应在末次会议上向受审核方告知该组织的相关证书信息将被放在公司网站上向社会公开,证书信息包括客户名称、相关的规范性文件、认证范围及地理位置。所有其他信息,除客户可以公开之信息以外,都将予以保密。Assessor leader should inform the customer in the last meeting that relevant certificate information will be placed on EQO website publicly. Certificate information including customer's company name, relevant regulatory documents, scope, and geographic location. All other information will be confidential except assessed company permit to public.
- 4.3.9 披露保密信息的注意事项: Note for the disclosure of confidential information:
- a) 当由于工作需要将高密信息提供给其他认可机构、同行评审方案的协议团体时,应将此项措施通知客户,并得到客户书面同意。When the high secret must be provided to other accreditation bodies, peer group assessment scheme of the agreement, shall notify the activity to the customer, and get the official permission of the customer.
- b) 当在履行法定责任时需要提供客户的机密信息时除非法律另有规定,否则应将所提供的信息预先通知相关客户或个人。When fulfill the legal responsibility, need provide the confidential information of the customer, should notice related customers or person, unless defined in law provision.
- c) 从客户以外其他来源(如投拆者、监管机构)获得的关于客户的信息应按保密信息处理; Information about customers obtained from sources other than customers (such as investors and regulators) shall be treated as confidential information
- 4.4 保密承诺confidentiality commitment
- 4.4.1 公司所有人员均应签署EQO-CP08-01《公正性与保密承诺书》,并对接触的有关信息予以保密。
- EQO all staff should sign the EQO-CP08-01 <Impartiality and confidentiality undertaking>, and assure keeping relevant information confidential.
- 4.4.2 参与审核的认证审核人员在参加审核前应做出公正性与保密承诺。

all relevant participate in the assessment should commit the fairness before perform the assessment.

4.4.3 在认证活动中,为避免外聘的审核员或专家与申请人(或已认证的受审核方)存在利益关系,应事先向申请人提供外聘人员的专业背景资料和所在机构的信息,以征得申请人的同意。否则,外聘人员应回避参与相关认证活动或不能接触有关文件与资料。

During the assessment performance, for avoiding external assessor or expert have interest relationship with the customer, shall notify the customer, and provide external personnel's professional background and the organization's information to the customer. Otherwise, the external personnel can't perform the assessment or avoid contacting relevant documents and materials.

4.5 凡违反本规定而造成后果,由责任人负责。公司将根据情节轻重给予其行政处分直至追究法律责任。 Whoever in violation of these provisions and cause consequences shall undertake the responsibility. EQO will punish the responsible person and investigate legal responsibility.

附录 B

亿科检测认证有限公司 修订记录

文件编码	EQO-CP22		文件名称	保密性管理规定		
版本	制订日期	制/修订人	制订或修订主要内容概要			
A	2022/01/10	卢小燕	新制定			
A1	2022/09/20	卢小燕	修改章节 4.2 保密信息分级 相关内容。			