MediCertLab Pleasure of cooperation	Document Code:	MCL_PO_02_02	
	Updated by:	001	2026-05-11
	Reviewed by:	004	2026-05-15
	Approved by:	001	2026-05-18

IMPARTIALITY AND CONFIDENTIALITY POLICY

1. Purpose, Scope and Nature

The Impartiality and Confidentiality Policy establishes the direction and organisational commitments concerning impartial conduct of activities, management of threats to objectivity, and protection of information obtained or generated in connection with the activities of MediCertLab Sp. z o.o.

Impartiality, confidentiality, integrity and professional competence are fundamental to maintaining trust in MediCertLab Sp. z o.o. and ensuring the proper provision of services and performance of laboratory activities.

This Policy applies to all activities of MediCertLab Sp. z o.o., including the activities of the testing laboratory, design and training activities, and management and support processes. It covers persons performing tasks on behalf of MediCertLab Sp. z o.o., as well as external persons and entities to the extent that their activities may affect impartiality or involve access to protected information.

This Policy supports the operation of the Integrated Management System based on the requirements of PN-EN ISO 9001 and, with respect to laboratory activities, takes into account the requirements of PN-EN ISO/IEC 17025 concerning impartiality and confidentiality.

This Policy does not replace arrangements relating to specific services or legally enforceable confidentiality obligations. Detailed rights, obligations, the scope of permitted disclosure of information and rules of liability are governed by applicable laws, contracts, agreements and terms and conditions of service.

This Policy does not constitute an offer, a commitment to absolute protection, a separate guarantee of the complete elimination of all threats or incidents, or an independent basis for extending the liability of MediCertLab Sp. z o.o. or granting rights to third parties.

2. Commitments to Impartiality

The Management Board of MediCertLab Sp. z o.o. establishes and maintains organisational arrangements appropriate to the current scope of activities and associated risks, ensuring that activities are performed impartially and decisions are made objectively.

MediCertLab Sp. z o.o. is committed to:

- conducting its activities with due professional care, in an objective, reliable and consistent manner;
- ensuring that results, statements of conformity, test reports, other reports and technical decisions are not influenced by commercial, financial, organisational, personal or other pressures;
- identifying and assessing, to an extent appropriate to their significance and risk, actual, potential and reasonably perceived threats to impartiality arising from activities, relationships, associations, combined responsibilities or other circumstances;

- taking measures to eliminate identified threats or reduce them to a level that allows objectivity and confidence in the activities performed to be maintained;
- applying measures appropriate to the nature of the matter, such as excluding a person from an activity or decision, conducting an additional independent review, restricting physical or logical access, modifying the manner of performance or implementing another appropriate measure;
- refraining from undertaking, suspending or terminating activities where the impartiality required for the relevant scope cannot be maintained;
- ensuring that a customer's use of other services provided by MediCertLab Sp. z o.o., or relationships with customers, suppliers, subcontractors or partners, do not constitute grounds for modifying results or technical decisions;
- assigning decision-making responsibilities to persons possessing the competence, responsibility and required authorisations appropriate to the scope and significance of the matter.

3. Commitments to Confidentiality and Information Protection

MediCertLab Sp. z o.o. manages information obtained or generated during its activities in accordance with applicable laws, agreements and legally enforceable confidentiality obligations.

MediCertLab Sp. z o.o. applies organisational and technical measures to protect information, selected according to its nature, significance, scope of access and associated risks. These measures are adjusted when conditions, risks or information processing methods change.

Protection is maintained after the termination of employment, cooperation, provision of services or access rights where required by the nature of the information, applicable laws or binding obligations.

MediCertLab Sp. z o.o. is committed to:

- using information only to the extent necessary to perform assigned tasks, provide agreed services and comply with applicable requirements;
- restricting physical and logical access to areas, samples, systems and information to authorised persons, to the extent justified by their assigned tasks and established access rules;
- implementing measures to reduce the risk of unauthorised access, disclosure, use, modification, loss, damage or destruction of information;
- ensuring that external persons and entities are subject to appropriate requirements and legally enforceable obligations concerning information protection, proportionate to the scope of cooperation, access and associated risks;
- protecting customer and partner information, commercial terms, information concerning orders, samples and test items, methods, technical data, results, test reports, other reports, correspondence, personal data, know-how and information that may constitute trade secrets;
- informing the customer in advance of any information relating to their matter that MediCertLab Sp. z o.o. intends to make publicly available, except for information already made publicly available by the customer or cases previously agreed with the customer;
- limiting disclosures required by law or permitted under binding arrangements to the applicable scope and notifying the customer or the person concerned of such disclosure, unless notification is prohibited by law;

- treating information concerning a customer obtained from sources other than the customer as confidential and protecting the identity of the source, unless the source consents to disclosure or disclosure is required by law.

4. Reporting Concerns and Responding to Incidents

Persons performing tasks on behalf of MediCertLab Sp. z o.o. shall report actual or potential conflicts of interest, attempts to exert influence, suspected breaches of confidentiality, unauthorised access, loss of information and other circumstances that may affect the objectivity of activities, the integrity of information or the validity of results.

Requirements applicable to external persons and entities are established according to the nature of their activities, level of access and associated risks.

Personnel, customers and other interested parties may raise concerns regarding impartiality, conflicts of interest, attempts to exert influence, confidentiality or information protection.

Reports and concerns are assessed while maintaining the required confidentiality and a level of objectivity appropriate to the nature of the matter. A person directly involved in a matter shall not make decisions concerning that matter independently.

The response, measures applied and extent of documentation are adapted to the nature, significance and risk of the matter.

No additional record is created where the course of events, decisions made and actions taken can be clearly demonstrated through existing reliable evidence.

Receipt of a report, implementation of precautionary measures or actions to mitigate consequences, or communication of information about an incident does not, in itself, constitute an acknowledgement of a breach, claim or liability.

5. Communication and Maintenance

This Policy is maintained as documented information, communicated to persons whose activities may affect impartiality or confidentiality, implemented within MediCertLab Sp. z o.o., and made available to relevant interested parties.

The Management Board of MediCertLab Sp. z o.o. maintains organisational arrangements appropriate for implementing this Policy and updates it whenever changes in activities, relationships, systems, the operating environment or applicable requirements affect its content.

This Impartiality and Confidentiality Policy has been established and approved by the Management Board of MediCertLab Sp. z o.o.