




## **Impartiality and Independence for SERMI Inspection Activities**

	<b>VALIDX Group Management System</b>	Document Type:	Regulation		
	Document Name	Implementation:	<input checked="" type="checkbox"/> VALIDX   ICDQ Partners (IT)		
	<b>Impartiality and Independence for SERMI Inspection Activities</b>	VXMS Ref No:	GOR.07		
		Version:	2	Date	13/06/2026

## 1. Purpose

The purpose of this Policy is to ensure that all SERMI inspection, evaluation, authorization, surveillance, and decision-making activities are conducted with the highest degree of impartiality, independence, objectivity, and professional competence.

As an Inspection Body operating under ISO/IEC 17020 and the SERMI Scheme, VALIDX AND ICDQ PARTNERS SRL recognizes that impartiality is fundamental to maintaining confidence in the validity of inspection results and authorization decision. Inspection activities shall be undertaken impartially, and commercial, financial, operational, or other pressures shall never compromise the objectivity of inspection outcomes.

We are committed to conducting all SERMI inspection and authorization activities impartially, independently, objectively, and confidentially. We recognize that trust in the SERMI scheme depends upon the integrity of our inspection process. We therefore identify, evaluate, eliminate, or minimize the risks to impartiality and ensure that no commercial, financial, personal, or organizational influence compromises our professional judgment or the validity of our decisions. Our personnel are required to act with integrity, independence, and fairness at all times, in accordance with ISO/IEC 17020 and SERMI scheme requirements.

## 2. Scope

The policy applies to all stakeholders and business associates and covers all activities related but not limited to:

- SERMI authorization assessments
- Initial inspections
- Surveillance activities
- Reassessments
- Complaints and appeals handling
- Certification and authorization decisions

## 3. Commitment to Impartiality

Top management is fully committed to safeguarding impartiality throughout all SERMI activities and shall ensure that:

- Inspection activities are conducted objectively and without bias
- Decisions are based solely on objective evidence and scheme requirements
- No commercial, financial, personal, or other pressures influence inspection outcomes
- All personnel understand their responsibility to act impartially
- Risks to impartiality are identified, analyzed, monitored and mitigated on an ongoing basis

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#### 4. Principles of Independence

To preserve confidence in SERMI authorizations, VALIDX AND ICDQ PARTNERS SRL remain independent from:

- Vehicle manufacturers
- Vehicle importers
- Independent operators seeking authorization
- Remote Service Suppliers (RSS)
- Repair workshops
- Automotive service networks
- Consultancy organizations involved in SERMI preparation
- Any entity that could benefit directly from the outcome of an inspection

VALIDX AND ICDQ PARTNERS SRL will not engage in activities that could compromise its impartiality, including:

- Consulting services related to obtaining SERMI authorization
- Preparation of applicants for SERMI assessments
- Designing, implementing, or maintaining management systems that will subsequently be assessed by the organization
- Any activity creating self-review, advocacy, financial, or familiarity risks

#### 5. Control Measures

- ISO/IEC 17020:2012 – Conformity assessment — Requirements for the operation of various types of bodies performing inspection
- SERMI Scheme Rules
- QMM – Quality Management Manual
- F.11 – Independence Declaration
- F.09 – Confidentiality Declaration
- Impartiality Risk Assessment and Mitigation measures
- Bexel automation

#### 6. Confidentiality and Data Protection

Given the security-sensitive nature of SERMI activities, VALIDX AND ICDQ PARTNERS SRL shall protect all information obtained during inspections.

Personnel:

- Access information only on a need-to-know basis
- Protect applicant data from unauthorized disclosure
- Comply with contractual, legal, SERMI, and GDPR requirements
- Prevent misuse of security-related information obtained during assessment activities.

All confidential information is handled through secure systems and procedures.

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## 7. Reporting Concerns

All employees are required to immediately report:

- Actual conflict of interest
- Potential Conflict of interest
- Attempts to influence inspection outcomes
- Undue commercial or financial pressure
- Breaches of confidentiality
- Any activity that may compromise impartiality

No employee shall suffer retaliation for reporting such concerns in good faith

## 8. Review and Revision

This regulation shall be reviewed every two years or whenever significant changes occur in the SERMI scheme or ISO/IEC 17020 requirements.

## 9. Amendments

Edition	Chapter	Cause & signs of modification	Drafted by	Approved by	Date
v.1 -> v.2	Overall	Format Change and Group Structure Information Showcasing the relationship with the new entity VALIDX and the IMS Implementation	Athanasios Arvanitis (Quality Manager)	Angelos Koulouridis Stergios Zarifidis Sara Pellegrino	13/05/2025
v.3	Overall	Change of content and exclusion of Impartiality Committee under the ISO/IEC 17020 and SERMI scheme	Ioannis Garinis (IMS Manager)	Angelos Koulouridis Stergios Zarifidis Sara Pellegrino	13/06/2026