

CODE OF ETHICS

Issue: AQ
Verification: DG
Approval: CdA
Issue of Italian version of Code of Ethics: version 02, Date 08.07.2022
Revised version of the English translation of the original document in Italian:10.04.25



ORGANISMO
NOTIFICATO
0546



Membro degli Accordi di Mutuo Riconoscimento EA, IAF e ILAC,
Signatory of EA, IAF and ILAC Mutual Recognition Agreements.
SGQ n. 008A - SGA n. 001D - SCR n. 002F - FSM n. 006I
PRD n. 008B - DAP n. 003H
SSI n. 007G - SGE n. 001M - ISP n. 066E - GHG n. 001O
EMAS n. 008P - ITX n. 004L - PRS n. 100C

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Certiquality Srl, a Quality Certification Body (hereinafter CQY or the Company), is accredited for the certification of organizations, products, processes, services, and individuals, and for inspection activities. It is also a "Notified Body" in Europe.

WHAT IS THE CODE OF ETHICS

The Code of Ethics (hereinafter "Code"), approved by the Board of Directors of CQY, contains the principles of conduct that the Company, its staff, and anyone carrying out activities in the name and/or on behalf of CQY must adhere to, both internally and towards third parties, as well as the resulting commitments.

Compliance with the Code is a necessary condition for establishing and maintaining employment, commercial, and contractual relationships of any kind with CQY. The purpose of the Code is for Recipients to maintain ethical behavior in all circumstances involving CQY, requiring a commitment to:

- Act with fairness and courtesy in dealings with all stakeholders;
- Respect the interests of all stakeholders (for example, customers, consumers, institutions, public authorities, the external community, etc.);
- Perform their role with professionalism and moral integrity.

The principles contained in the Code underpin the corporate policies, practices, and operating procedures applied by CQY. The Code also defines the procedures for verifying effective compliance and the sanctions applicable in the event of violation.

MISSION

The Company's mission is to facilitate for-profit and non-profit organizations and public administrations in assessing and managing complexity by providing training and assessment on international methodological standards for compliance and governance on a global scale so that they can leverage their skills to be sustainable and competitive in the long term.

VALUES

INTEGRITY, ACCOUNTABILITY, IMPARTIALITY

Having an ethical, transparent, responsible and intellectually honest behaviour with a high sense of duty. Making decisions with balanced rigour and without conditioning.

CUSTOMER FOCUS, PROFESSIONALISM, ASSERTIVENESS

Continuous attention to customers' needs with a proactive and professional spirit in order to guarantee that they receive excellent service by satisfying their explicit, implicit and latent needs within the framework of current regulatory references. Maintaining assertive behaviour towards the organisation's internal and external customers.

BELONGING, TEAM SPIRIT, CARE FOR RESOURCES

Awareness of belonging to a cohesive organisation that shares the same goals and values with a high capacity for teamwork. Taking care of direct and indirect human resources through training, continuous motivation, meritocracy, and careful selection as well as care and attention to economic and financial resources.

RELIABILITY, EMPATHY, ADAPTATION

Behaving reliably, credibly and consistently to maintain the organisation's reputation by meeting



commitments and deadlines. Thinking empathetically by adapting to needs and changes so that tomorrow is better than today.

WHO IS THE CODE OF ETHICS ADDRESSED TO: THE RECIPIENTS

The provisions of the Code apply, without exception, to all directors and company personnel, including employees, consultants, and evaluators (hereinafter "Recipients") who have contractual relationships with CQY, in all countries in which CQY operates.

Recipients are therefore required to read the Code, understand its contents, adopt them, and conduct themselves in accordance with its principles. Furthermore, Recipients are required to report any violations of the Code to the appropriate bodies, as further explained in the final section of the Code. Compliance with the provisions of the Code must be considered an essential part of the Recipients' contractual obligations.

CQY management is responsible for communicating, explaining, and ensuring the understanding of this Code by all company personnel. Management ensures that the commitments expressed in the Code are implemented across all areas and functions.

The Company's Mission and Values are set forth below.

THE RULES OF THE CODE ETHICS

1. CONFLICT OF INTEREST

Recipients are required to avoid any possible conflict of interest, with particular reference to personal and/or family interests that could influence the independence of their judgment, or in any case conflict with the interests of CQY, also in order to guarantee a high level of reputation.

The Recipients must immediately report to their hierarchical superior (in the case of employees of CQY) and/or to top management any situation that constitutes or may generate a conflict of interest.

In particular, Recipients must disclose the existence of a stable or temporary employment relationship, or a financial, commercial, professional, family relationship with entities external to CQY that might affect the impartiality of their conduct or compromise the fairness of the activities they carry out.

The independence of the certification body and its human resources is an essential requirement of accreditation standards and authorisation requirements.

Where a conflict of interest, even a potential one, concerns senior management, they are required to promptly disclose its existence to the Board of Directors so that the resulting decisions can be made.

Should a conflict of interest, or even a potential one, concern directors, they are required to disclose its existence to the Board of Directors and abstain from participating in decisions adopted by the Board on matters subject to the potential conflict.

2. GIFTS, FREEBIES AND BENEFITS – FIGHTING CORRUPTION

Under no circumstances does CQY tolerate behavior whereby Recipients offer or accept, directly or through intermediaries, money, gifts, or promises, or otherwise obtain an advantage of any kind, in order to perform, omit, or delay an act within the scope of their duties, or to perform or obtain undue services for themselves or for CQY.

Only the sporadic acceptance of gifts of modest value, especially on special occasions, is permitted, provided it is done purely out of generosity and not as a token of gratitude or consideration.



Corruption distorts competition in the business world and causes harm to both individuals and society. Corruption could also result in criminal and/or civil proceedings against Recipients, as well as against the Company itself. CQY strictly prohibits active and passive corruption, both in the public and private sectors, regardless of its purpose. Any such conduct by Recipients will result in the application of the most severe disciplinary sanctions.

Audit activities must be conducted with the utmost rigor and absolute integrity, ensuring the impartiality and independence required to perform the task.

3. ANTI-TRUST LEGISLATION

Recipients consider antitrust law a value and base their activities on preventing the possible emergence of anti-competitive behavior.

Considering this, CQY aligns its business policy with internal and international regulations protecting free competition. Recipients are prohibited from engaging in behavior that constitutes antitrust violations.

4. PROTECTION OF COMPANY ASSETS

Recipients must act diligently to protect company assets by using the tools entrusted to them correctly and responsibly, avoiding their improper use and refraining from committing illegal acts through their use.

5. PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY

Recipients must consider company information of any nature (commercial, financial, technological, etc.), as well as intellectual property (trademarks, software, etc.) are assets of primary importance to CQY.

It is therefore forbidden to disclose to anyone who is not directly interested/involved in the activities covered by the protection referred to in this paragraph any information of any kind that could put the Company's professional and commercial assets at risk.

Likewise, information received from third parties is treated by CQY with full respect for the confidentiality and privacy of those concerned. To this end, specific policies and procedures for the protection of information are applied and constantly updated in accordance with applicable laws.

6. RELATIONS WITH STAFF

6.1 Compliance with contract and labour regulations

CQY considers human resources a fundamental asset for its business and takes every appropriate action to maximize the various opportunities provided by the National Collective Bargaining Agreement, applied in accordance with the strategic decisions adopted by the Company.

A written contract is drawn up for each consultant and evaluator, drafted in accordance with applicable laws.

6.2 Selection, management and development of human resources

CQY avoids any form of discrimination against its employees/collaborators and adopts objective and equal opportunity criteria in its selection, management and development of human resources.

6.3 Protection of moral and physical integrity

All company employees, whose moral and physical integrity is considered a primary value by CQY, are guaranteed working conditions that respect individual dignity, in safe and healthy work environments. Specifically, the company does not tolerate abuse of power, violent attitudes, discriminatory behavior, or any behavior that is harmful to the personality and the individual.

CQY is committed to spreading and consolidating a safety culture, developing risk awareness, promoting responsible behaviour by all employees, adopting suitable working methods, ensuring adequate training, and making every appropriate effort aimed at preventing events that could harm the moral and physical integrity of the Recipients.

6.4 Protection of privacy

CQY operates in accordance with the regulations governing the processing of personal data.

CQY bases its management policy on the maximum protection of the privacy of the Recipients, adopting the appropriate methods of processing and storing the information that the Company requires to best carry out its business.

Surveys regarding personal opinions and preferences and, in general, the private life of company staff are not allowed.

7. RELATIONS WITH CUSTOMERS AND SUPPLIERS

Relations with CQY's customers are characterised by fairness and good faith, as well as compliance with the regulations in force, including all the rules on accreditation.

Suppliers are selected on the basis of objective criteria, such as price and quality of service, according to the principle of parity.

8. RELATIONS WITH CONSUMERS AND THE MEDIA

CQY is committed to guaranteeing consumers an immediate, qualified, and competent response to their needs by providing correct and truthful information on the validity of the certificates issued.

CQY's external communications are based on respect for the right to information. Under no circumstances is it permitted to disseminate false or biased news or comments

9. RELATIONS WITH THE COMMUNITY AND THE INSTITUTIONS

9.1 Sustainability

In its activities, CQY supports sustainable development in order to preserve a constant balance between the social, environmental and governance dimensions, aiming to meet the present needs of all stakeholders without compromising those of future generations.

9.2 Economic relations with political parties, unions and trade associations

CQY does not finance political parties, their representatives or candidates, nor does it sponsor political propaganda events. It refrains from any direct or indirect pressure on political figures.

CQY generally does not make contributions to organisations such as unions and associations for the protection of collective interests.

It is, however, possible to cooperate, including financially, with such organisations if the following conditions are met cumulatively:

- Purposes related to CQY's mission;
- Clear and documentable allocation of resources;
- Express authorization from the Board of Directors.

CQY may evaluate grant requests limited to proposals from non-profit organizations and associations, research institutes, and public and private universities, provided they are established with regular statutes and articles of association, which must, in any case, be authorized by the Board of Directors.

9.3 Relations with Public Institutions

Relations with public institutions, both national and supranational, are characterized by the utmost institutional respect and are conducted according to the criteria of loyalty and transparency.

COMPLIANCE WITH THE CODE OF ETHICS

Compliance with the rules of this Code must be considered an essential part of the contractual obligations undertaken by Recipients in light of their commitment to the Company.

The management of the various CQY Functions is responsible for ensuring that its expectations of employee conduct are understood and that employees put the rules into practice. Management, therefore, must ensure that the commitments expressed in the Code are implemented at the level of the various functions.

REPORTING VIOLATIONS

In order to ensure the effective application of the Code, CQY requests Recipients who become aware of any cases of non-compliance with this Code to report the relevant violation in the following manner.

Employees, consultants and auditor shall promptly report any violations or concrete suspicions of violations to their direct superior or company functional contact person; alternatively, the reporting parties may directly contact the Supervisory Board appointed by the Company's Board of Directors (hereinafter 'SB').

For persons outside CQY, reports must be made directly to the Supervisory Board.

Reports to the Supervisory Board must be made in writing to one of the following addresses:

- Organismo di Vigilanza, c/o Certiquality Srl, Via G. Giardino 4, 20123 Milan
- OdV@certiquality.it

The company adopts appropriate measures to ensure that the confidentiality of the whistleblower's identity is always guaranteed.

The reporting of violations cannot result in any consequences in the labour or contractual sphere, since the Company promotes this conduct.

Any form of retaliation against people who have in good faith reported possible violations of the Code is also a violation of the Code. On the other hand, it is considered a violation of the Code if a person accuses other Recipients of a violation, knowing that such a violation does not exist or has never been committed.

SANCTIONS

The violation of the principles established in the Code of Ethics and in the corporate procedures compromises the relationship of trust between CQY and the Recipient who commits the violation. After being confirmed, violations will be prosecuted promptly and immediately through the adoption of



appropriate and proportionate disciplinary measures, independently of any criminal, civil or administrative relevance of such conduct.

Disciplinary measures for violations of this Code shall be taken by CQY in accordance with the provisions of the laws in force, as well as the relevant national labour contracts. Such measures may also include the removal from the company of those responsible for such misconduct.

DISTRIBUTION OF THE CODE OF ETHICS

This Code is approved by the Board of Directors and brought to the attention of the recipients.

The Code of Ethics can be found on the website www.certiquality.it. It is distributed to all staff, also by e-mail. A copy can be requested from the Quality Assurance function.

Updates and revisions of the Code are approved by the CQY Board of Directors. In order to ensure the correct understanding of the Code of Ethics, CQY prepares a training plan to ensure its full dissemination and understanding.