

## CODE OF ETHICS

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Certiquality Quality Certification Body is an Accredited Body for the Certification of Organisations, Products, Processes, Services, Persons and for Inspection activities; it is also a Notified Body at the European level.

## **MISSION**

Our mission is to facilitate for-profit, non-profit and public sector organisations in assessing and managing complexity by providing training and assessment on international compliance and governance methodological standards on a global scale so that the aforementioned organisations can direct their competencies to be sustainable and competitive in the long run.

## **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.

### **PERSEVERANCE, TRUST, PERFORMANCE**

Working with passion, mutual trust, tenacity, competence and discipline to achieve excellent individual and team performance with all stakeholders.

## **WHAT IS THE CODE OF ETHICS**

The Code of Ethics (hereinafter, the "Code") is approved by the Board of Directors of CERTIQUALITY srl (hereinafter, CQY or the Company). It contains the principles of conduct that the Company, its staff and anyone who carries out activities in the name and/or on behalf of CQY (hereinafter, jointly the Recipients, as better defined in the following paragraph) must keep both internally and towards third parties, as well as the consequent commitments.

Compliance with the Code is a necessary condition for the establishment and continuation of working, commercial and contractual relations of any kind with CQY.

The purpose of the Code is to ensure that Recipients maintain ethical behaviour in all circumstances in which CQY is or may be involved. In particular, recipients should make a commitment to:

- complying with the laws in force in each country where CQY operates;
- operating with fairness and courtesy in relations between colleagues;
- respecting the interests of all other stakeholders (customers, consumers, institutions, public authorities and the external community);
- performing their role with professionalism and moral integrity.

The principles contained in the Code underpin corporate policies, practices and operating procedures applied by CQY.

The Code also defines the modalities for verifying effective compliance and the sanctions applied in the event of violations.

The Code

### **TO WHOM THE CODE OF ETHICS IS ADDRESSED: RECIPIENTS**

The rules of the Code apply, without exception, to all directors and company personnel who have employment relationships with CERTIQUALITY, in Italy and in all other countries in which CERTIQUALITY operates. The term '*company personnel*' includes:

employees

all other collaborators, and mainly consultants and evaluators. Where necessary, individual components are indicated separately.

Company directors and staff are therefore required to read it, to be familiar with its contents, to accept it and to conduct themselves in accordance with its principles. In addition, staff are also required to report any violations of the Code to the appropriate bodies, as explained in more detail at the end of this document.

Compliance with the rules of the Code must be considered an essential part of the contractual obligations of the company's staff and of the people who have business relations with CQY.

The management of CQY is responsible for making known and explaining this Code, and ensuring that all company personnel understand it. The management ensures that the commitments expressed in the Code are implemented in all Areas and Functions.

### **THE RULES OF THE CODE ETHICS**

#### **1. CONFLICT OF INTEREST**

The 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 judgement, or otherwise conflict with the interests of CQY.

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

## **2. GIFTS AND BENEFITS**

It is not permitted to offer or receive any form of gift or benefit that may be interpreted as exceeding normal business practices and courtesy, or that may be intended as a means of acquiring favourable treatment in the performance of work activities.

It is prohibited to engage, personally or through an intermediary, in corruptive conduct towards public officials, officers or employees of the Public Administration, public authorities and institutions, as well as towards private persons, in any form or manner whatsoever. The rules regulating the matter in the individual national legislations must be strictly observed.

Audit activities must be carried out with the utmost rigour and integrity, guaranteeing the impartiality and independence required to perform the task.

## **3. ANTI-TRUST LEGISLATION**

CQY orients its business policy in compliance with domestic and supranational regulations protecting free competition. It is prohibited for Recipients to engage in conduct constituting anti-trust offences.

## **4. ACCOUNTING PROCEDURES**

CQY operates with the utmost transparency at the administrative and accounting levels, guaranteeing the truthfulness, accuracy and completeness of the information relating to each accounting entry.

CQY ensures the timely preparation of periodic financial statements so that they are complete, accurate, reliable and understandable.

## **5. PROTECTION OF CORPORATE ASSETS**

The Recipients must act with diligence to protect the corporate assets by using the tools entrusted to them in a correct and responsible manner, avoiding their improper use, and refraining from committing unlawful acts through their use.

## **6. PROTECTION OF INFORMATION AND INTELLECTUAL PROPERTY**

Corporate information of any kind (commercial, financial, technological, etc.), as well as intellectual property (trademarks, computer programmes, etc.) are assets of primary importance to CQY. It is therefore forbidden to disclose to unauthorised persons (internally and/or externally) information of any kind that could jeopardise the Company's professional and commercial assets.

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.

## **7. RELATIONS WITH STAFF**

### **7.1 Compliance with contract and labour regulations**

CQY is committed to respecting fundamental human rights, labour laws and regulations in each country. In particular, every employee is employed under a regular employment contract and no form of irregular, child, or undeclared labour is tolerated.

A written contract drawn up in accordance with the laws in force is prepared for each employee.

### **7.2 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.

### **7.3 Protection of moral and physical integrity**

All company staff, whose physical and moral integrity is considered a primary value of CQY, are guaranteed working conditions that respect individual dignity, in safe and healthy working environments.

In particular, the company does not tolerate:

- abuse of power: this constitutes abuse of the position of authority to request personal services and favours, or adopting attitudes or performing actions that are detrimental to the dignity and autonomy of the employee;
- acts of psychological violence, attitudes or behaviour that are discriminatory or harmful to the person and his beliefs;
- sexual harassment, and behaviour or speech that may disturb personal sensitivities.

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 operating in full compliance with all relevant legislation.

### **7.4 Protection of privacy**

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

The privacy of personnel is protected by complying with the rules set forth in the law and by adopting appropriate ways of processing and storing the information that the company requires.

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

## **8. 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.

## **9. 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 communication to the outside world is characterised by respect for the right to information. Under no circumstances may false or tendentious news or comments be disseminated.

## **10. RELATIONS WITH THE COMMUNITY AND THE INSTITUTIONS**

### **10.1 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.

### **10.2 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:

purpose traceable to CQY's mission; clear and documentable allocation of resources;  
express authorisation by the relevant functions.

CQY can only consider requests for contributions from non-profit organisations and associations with proper statutes and articles of association.

### **10.3 Relations with Public Institutions**

Relations with public, national and supranational institutions are handled with the utmost respect. They are conducted in accordance with the criteria of fairness, transparency and according to the applicable legal provisions.

## **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 and collaborators 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](mailto:OdV@certiquality.it)

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.

## DISSEMINATION 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](http://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.