



## CODE OF INTEGRITY

Dear Colleagues,

For us, the trust that we inspire in our customers and stakeholders is the key to our success as an organisation and as individuals.

This Code of Integrity is the expression of values which are shared throughout CFE Certification.

In order to achieve our goals, we aim to attract employees who feel responsible for delivering their work with impartiality and honesty. We recognise that we have a responsibility to each other and to our customers to maintain our principles of integrity.

CFE Certification employees and partners are the safeguards of the CFE Certification brand and reputation, and they defend the values the company represents in the marketplace. They achieve this objective by conducting their business honestly and transparently.

As a part of this commitment, we encourage an open culture where we can exchange ideas and information.

This will allow us to serve the interests of our customers in the markets, provide opportunities to our employees and create sustainable returns to our shareholders.

A handwritten signature in black ink, appearing to read 'Omer Kilinc', written in a cursive style.

Omer Kilinc  
CFE Certification  
Director

CFE Certification provides a wide range of certification services on Management Systems. CFE Certification's continuous improvement approach supports the customers with expert assistance and compliance in every stage of your business.

CFE Certification's success rests on the trust from customers, employees, shareholders and from the communities where it conducts business.

This trust has been earned through the collective efforts of employees. CFE Certification is focused on maintaining this trust through the effective implementation of this Code of Integrity.

## **APPLICATION OF THE CODE**

The Code applies to all employees, managers and director of CFE Certification. All aspects of the Code, which are not specifically related to CFE Certification employees, must also be adhered to by contractors, service providers, freelancers, joint-venture partners, agents, subcontractors and anyone acting on behalf of, or representing, CFE Certification.

## **UNDERSTANDING THE CODE**

It is the personal responsibility of each CFE Certification employee to read and understand the Code and commit to upholding its principles.

## **SEEKING GUIDANCE**

Guidance and support are available to help employees understand the Code and to help them make the right decisions.

## **NO RETALIATION FOR GOOD FAITH REPORTS**

Employees are encouraged to speak out and report any concerns or suspicion that the Code is being violated. CFE Certification ensures that no-one faces any form of retaliation or adverse consequences for having sought advice or reported a violation of the Code. Retaliation against an employee who has reported a violation in good faith will result in disciplinary action.

# **A CULTURE OF INTEGRITY**

## **CFE CERTIFICATION PRINCIPLES OF INTEGRITY**

- Trust: this is our single most valuable asset, the foundation of our brand and reputation.
- Honesty and transparency: in everything that we do, we need to be truthful to ourselves, our customers and colleagues.
- Accountability: We accept the consequences of our choices and do not blame others for our actions.
- Principles: we believe in acting ethically, in fairness and respect for others.

## **NO TOLERANCE FOR VIOLATIONS**

Any breach of the Code, however small, can harm CFE Certification's reputation and brand is not tolerated. Violations of the Code will result in disciplinary action.

## **SEEKING GUIDANCE OR RAISING A CONCERN**

When in doubt about the meaning of the Code or its application to specific circumstances, employees should discuss this with their managers or directors.

Employees who become aware of a violation or suspected violation of the Code are encouraged to make a report to the Director. All the information that is received regarding Code of Integrity is discussed at Investigation Committee meetings.

The Director can be contacted by current and former CFE Certification employees, by customers or suppliers, or by third parties regarding matters relating to the Code of Integrity by the following email address: [cfecert@cfecert.co.uk](mailto:cfecert@cfecert.co.uk)

When CFE management is contacted in relation to the Code of Integrity, the information provided is kept confidential and is only used to respond to or address the issue raised. Persons making a report are encouraged to provide their name and contact details but may also choose to keep their identity confidential. In this case, an appropriate means of communication can be designed to allow the caller to receive feedback without divulging his/her identity.

Suspensions of breaches of the Code of Integrity that is brought to the attention of the CFE are investigated fairly by Investigation Committee. When appropriate, feedback on the outcome of the investigation is communicated to the person making the complaint or the report.

## **INTEGRITY OF SERVICES**

All CFE Certification services must be undertaken professionally and honestly in accordance with agreed standards, methods and policies.

CFE Certification maintains its independence of judgment and does not surrender to pressure and inducements to misrepresent findings or alter the results of its certifications and audits.

## **INTEGRITY OF FINANCIAL RECORDS**

The information recorded in CFE Certification financial records must be true and fair, timely and accurate.

## **CONFLICTS OF INTEREST**

### **GENERAL**

Conflicts of interest, or the possible appearance of a conflict of interest, must be avoided. CFE Certification employees are expected to declare to their managers as soon as they become aware that their personal interests or the personal interests of their close relatives or close friends may potentially conflict with the interests of CFE Certification.

Conflicts of interest can arise in many ways. If in doubt, employees should seek guidance.

### **CLOSE RELATIVES: DEFINITION**

Close relatives of an employee include a spouse or life partner; children, grandchildren; parents and grandparents; siblings; brothers- and sisters-in-law; sons- and daughters-in-law; and any person living with the employee.

### **PRIOR APPROVAL REQUIRED**

Some potential conflicts of interest facing CFE Certification employees can be resolved with prior approval and appropriate clearance by CFE Certification.

These include:

#### **DIRECTORSHIP OUTSIDE CFE Certification**

Serving on the board of directors of a company outside, serving on the board of a professional or trade association or assuming a political appointment at a local or national level requires the prior approval of the Director.

#### **WORKING OUTSIDE CFE Certification**

Taking a second job or employment outside CFE Certification requires the prior written approval of the Director.

## **HIRING CLOSE RELATIVES**

Hiring a close relative of an existing CFE Certification employee requires the prior written approval of the Director.

## **NOT PERMITTED**

Some situations of conflicts of interest are forbidden to CFE Certification employees. These include:

### **SELF-DEALING**

- Personally, offering or participating in any form of professional or consultancy services to a customer or prospective customer of CFE Certification.
- Competing with CFE Certification or working for a competitor of CFE Certification.
- Obtaining a personal gain, or procuring a personal gain for a close relative, by abusing a position within CFE Certification or accessing CFE Certification information.

### **PERSONAL INVESTMENTS IN SUPPLIERS, COMPETITORS AND CUSTOMERS**

- Knowingly engaging the services of a supplier or sub-contractor of CFE Certification in which an employee or a close relative directly or indirectly have a significant shareholding or other financial interests is not permitted unless: (i) the potential conflict has been transparently declared to the employee's line manager and (ii) the employee affected by the conflict does not take part in the procurement process.
- Making a personal investment in a supplier, sub-contractor, competitor or customer of CFE Certification is not permitted.

## **USE OF COMPANY ASSETS AND RESOURCES**

### **SAFEGUARD COMPANY ASSETS AND FUNDS**

It is not permitted to use CFE Certification assets or resources for any form of personal benefit or to perform work for an external party.

### **USE OF IT RESOURCES**

Company computers, network systems and electronic communication tools must be used for professional purposes. Use of e-mail, internet and other modes of electronic communication may be monitored and audited by CFE Certification (when permissible under relevant privacy laws) when suspicion of abuse arises.

### **PROCUREMENT**

CFE Certification employees in charge of purchasing goods and services from suppliers or selecting sub-contractors must do so with the sole aim of securing the best overall value for such services, with due regard to supplier quality and reputation. Soliciting any form of personal advantages from a supplier or from a person seeking to offer services to CFE Certification is strictly prohibited.

## **BRIBERY AND CORRUPTION**

### **BRIBERY AND CORRUPTION**

CFE Certification does not engage in bribery or corruption of any form, in any of the countries where it operates. Employees, or anyone acting on behalf of CFE Certification, must not offer or make payments to government officials, whether directly or indirectly, or offer them any gift or entertainment with the aim of influencing their decision or encourage them to secure an improper advantage for CFE Certification.

Any CFE Certification employee who receives a demand for a bribe must report the matter immediately to Certification Manager and/or to the Director.

### **NO PAYMENT FOR BUSINESS**

CFE Certification does not pay or offer any form of improper incentive for the purpose of securing business for CFE Certification.

## **INTERMEDIARIES AND SERVICE PROVIDERS**

CFE Certification does not use the services of intermediaries, agents, service providers, partners, joint-venture partners or contractors in cases where it suspects that such partners may engage in corruption or other illicit trade practices.

Intermediaries must be given, sign and acknowledge a copy of this Code and agree to work to its principles in all aspects of their relationship with CFE Certification. CFE Certification employees managing the use of an intermediary are responsible for regularly monitoring their compliance with the Code.

## **FACILITATION PAYMENTS**

Demands by officials for facilitation payments must be strongly resisted and only granted when refusing could be detrimental to employees' welfare or could create a significant risk to CFE Certification business.

## **REPORTING AND ACCOUNTING**

Facilitation payments must be accounted in a manner that allows them to be audited.

## **NO ADVERSE CONSEQUENCES FOR REFUSING TO PAY A BRIBE**

No CFE Certification employee will be penalised for refusing to pay a bribe, for refusing to engage in corrupt practices or refusing to make a facilitation payment.

## **POLITICAL DONATIONS AND CHARITABLE CONTRIBUTIONS**

### **NO POLITICAL OR RELIGIOUS DONATIONS**

CFE Certification does not contribute funds or resources to any political party, elected official or candidate for public office in any country, and does not support any political campaign, does not support any religious organisation.

### **CHARITABLE CONTRIBUTIONS**

Approval for any form of charitable contributions will not be given if they are intended or appear to influence government officials or third parties to grant improper advantages to CFE Certification.

## **GIFTS AND ENTERTAINMENT**

### **GENERAL PRINCIPLES**

No gift, hospitality or entertainment should be offered or accepted if they influence improperly or create the appearance of improper influence on business decisions.

Gifts, hospitality and entertainment shall not exceed what is usual in normal business relations. Any form of entertainment that could be damaging to the reputation of CFE Certification must be avoided. The following rules clarify the expected standard of behaviour of CFE Certification employees.

### **GIFTS OFFERED TO CFE CERTIFICATION EMPLOYEES**

CFE Certification employees must never accept:

- Payment of cash, tips, loans or cash equivalent gifts from suppliers or customers.
- Any personal gifts, favours, entertainment or hospitality when those are given in connection with services performed by CFE Certification.
- Employees involved in decisions on procurement or selection of suppliers must not accept personal gifts offered by suppliers or prospective suppliers. Usual hospitality and entertainment, including participation in trade fairs and similar professional events which are sponsored by suppliers, is acceptable, subject to reporting and clearance obligations.

### **REPORTING AND CLEARANCE OBLIGATIONS**

Employees are required to report and seek the prior approval of the Director before accepting any gift of a value above GBP 100.

If gifts received cannot be refused or returned without causing offence, the person receiving the gift should choose a suitable method of disposal, for example, a donation to a chosen charity.

## **GIFTS OFFERED BY CFE CERTIFICATION TO BUSINESS RELATIONS**

Personal gifts offered by CFE Certification to customers or business relations require the prior approval of the Director for any gift of a value above GBP100.

## **FAIR COMPETITION**

CFE Certification does not discuss competitive bid processes with competitors.

CFE Certification does not obtain confidential information on competitors by using illegal or unethical means.

## **EMPLOYEE RELATIONS**

### **NO DISCRIMINATION**

All CFE Certification employees must be treated and evaluated solely on their job-related skills, qualifications, behaviour and performance. CFE Certification bases all aspects of the employment relationship on the principle of equal opportunity, regardless of race, colour, gender, religion, political affiliation, union membership, nationality, sexual orientation, social origin, age or disability. Discrimination based on these criteria is not tolerated.

### **BULLYING AND SEXUAL HARASSMENT**

Any form of abuse, harassment and bullying is prohibited. Unwelcome sexual advances, requests for sexual favours or inappropriate physical contact are not tolerated. All employees are expected to treat their fellow employees with respect. Employees must be truthful and respectful at all times in dealing with their staff members, colleagues and management. This extends to CFE Certification customers, suppliers, their employees and management.

### **PROHIBITION OF CHILD LABOUR OR FORCED LABOUR**

CFE Certification does not employ children under the age of completion of compulsory schooling or, in any case, under 16 years. If hired, young workers between the ages of 16 to 18 are protected from any type of work which may harm their health, welfare, safety or education.

CFE Certification does not engage in any form of slavery, sale or trafficking of children, debt bondage or serfdom, forced or compulsory labour.

CFE Certification does not use under any circumstances, any forced, bonded or prison labour.

### **FREEDOM OF ASSOCIATION**

CFE Certification recognises the right of its employees to form and join trade unions and bargain collectively. In situations in which the right to freedom of association or collective bargaining is restricted under law, CFE Certification facilitates parallel means of independent and free association and bargaining. Employees' representatives have access to the necessary time and facilities to carry out their representative functions.

## **ENVIRONMENT, HEALTH AND SAFETY**

### **ENVIRONMENT**

CFE Certification endeavours to reduce the impact of its activities on the environment by promoting the efficient use of natural resources, reducing and preventing pollution and minimising emissions of harmful substances and greenhouse gas emissions.

### **HEALTH AND SAFETY**

Employees must be provided with safe working environments, conditions and equipment with appropriate steps in place to prevent injuries and occupational illnesses.

CFE Certification employees are expected to report and record any work-related accident or pollution incident as required by CFE Certification policies or relevant laws. No employee will be penalised for reporting an accident or a pollution incident.

## **CONFIDENTIALITY**

CFE Certification respects and protects the confidential information that is entrusted by customers and third parties in the course of business and takes appropriate measures to prevent accidental disclosure.

## **INTELLECTUAL PROPERTY**

CFE Certification protects its own intellectual property and respects the intellectual property of others.

CFE Certification's intellectual property can take many forms, including processes, designs, methods, operating procedures, commercial and marketing strategies, customers' information, pricing and costing models. Employees must not disclose, copy or use this intellectual property except for its intended purpose.

Employees must apply the same degree of care when being exposed to customers' intellectual property.

Using unlicensed software, using or reproducing copyrighted materials without authorisation or knowingly breaching a valid patent is prohibited.

## **EXTERNAL COMMUNICATION**

No employee shall speak on behalf of CFE Certification, discuss or disclose any information regarding CFE Certification to the media, to financial analysts, to current or potential investors, or issue any public statement on behalf of CFE Certification unless specifically authorised to do so.

Personal opinions, with regards to religion and politics, or any form of objectionable content cannot be expressed on CFE Certification letterhead, e-mail or in any other context where such opinions or materials could appear to be attributable to CFE Certification.

When participating in online discussion forums and social media, CFE Certification employees must comply with the Code of Integrity.

## **COMPLIANCE WITH LAWS**

CFE Certification complies with applicable laws in the countries where it does business.

When in doubt as to how to resolve a contradiction between this Code and applicable laws, employees should seek guidance.

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