



## **Code of Business Conduct Policy**

**Purpose:** To establish codes of business conduct expected of persons performing work on behalf of Advanced Consulting and Engineering Iberia SL, hereinafter referred to as A.C.&E. Iberia S.L.

**Scope:** That all employees and collaborators of AC&E Iberia SL are aware of and comply with this code of conduct for the correct management of activities, in accordance with the requirements of the standards ISO IEC 17065:2012, ISO IEC 17020: 2012, ISO IEC 17025:2017 and ISO 9001:2015.

### **STATEMENT OF POLICY**

The company strives to operate with the highest level of standards. All persons engaged to perform work on behalf of the company are expected to adhere to the codes of business conduct listed here, along with other standards of conduct established by the company, accrediting bodies and governing bodies. These codes apply on and off the company's premises, while an individual is performing work on behalf of the company or representing the company. It is impossible to list all reasonably expected standards of behaviour in this policy, therefore good judgment and common sense should be exercised whenever representing the company. By signing this document, employees acknowledge receipt of the codes of business conduct and confirm that they will follow the policy. In addition, employees are asked to confirm that they understand and comply with the Codes of Business Conduct.

### **ENFORCEMENT AND PROCEDURES**

You have the right and the responsibility to express concerns and/or knowledge pertaining to any action which is in conflict with this policy. Additionally, suggestions for improving the quality of work, work practices, and the workplace in general are encouraged.

If you perceive that any actions of the company, a person performing work on behalf of the company, a client, or a **vendor** are in conflict with established standards, procedures, or policies, and/or are unlawful or unethical, you should report it to management immediately. Employees should report issues in writing to the Quality Manager. The company will conduct an investigation and take appropriate action. Adverse action will not be taken against those who make such a report.

Willful violation of this policy will result in appropriate action which may include legal action, termination of contracts, or disciplinary action which may include termination of employment.

### **GENERAL CONDUCT**

Perform the work for which you were hired or that has been assigned to you to the best of your ability. Devote all of your working time, for which you were retained, to the company. Personal affairs should be conducted in such a manner that will not conflict with the interests of the company.

Represent the company in a professional manner. Shall not engage in any conduct which is malicious or slanderous, or in any way damaging to the effective operations of the company, or to the reputation of the company.

Responsible for behaving in a civil, courteous and cooperative manner while at work, and towards employees, clients and other business associates. Intimidation, harassment, discrimination, rudeness, insubordination and uncooperative behaviour will not be tolerated. Any behaviour that includes excessive yelling, cursing, or acts of violence or destruction are against this policy.

Ensure that personal appearance standards are maintained, casual attire is conducive to many aspects of our business activities. However, some activities or events require proper business attire and may include: special client meetings, public appearances, and company visits and tours. In any case, you must present a professional, groomed and positive image.

Employees are responsible for reviewing and complying with established company policies and procedures.

### **QUALITY**

Shall perform work in accordance with standards, procedures, methods, practices, laws, regulations and policies established by the company, and applicable accrediting and governing bodies.



### **HEALTH, ENVIRONMENT AND SAFETY**

Adhere to all applicable laws, regulations, and company practices and procedures designed to promote and maintain healthy, safe conditions and environments.

### **UNLAWFUL AND UNETHICAL ACTS**

Shall not perform unlawful or unethical acts on behalf of the company or its clients, nor shall the company request anyone to perform unlawful or unethical acts on behalf of the company or its clients.

Shall not participate in unlawful or unethical behaviour which adversely affects the business or reputation of the company or its clients, infringes on the rights of employees, or interferes with work responsibilities.

Shall not provide any false information to the company, or on behalf of the company.

Shall not share confidential company, employees or client information unless it is expressly permitted as part of your job responsibilities and/or is pre-approved by Managing Director.

### **CONFLICT OF INTEREST**

You represent that you are free to enter into employment, or a service agreement, with the company and to perform the duties for which you are being retained, that does not violate any non-compete agreement or restrictive covenant in which you may have entered into previously.

Shall not solicit or accept any gift, gratuity, favour, entertainment, reward, or other tangible or intangible benefit that might influence, or appear to influence your judgment or conduct in the performance of your work. You may accept gifts or entertainment only in cases where the gifts or entertainment are of nominal value, are customary in the industry, will not violate any laws and will not influence or appear to influence your business judgment or conduct.

When the refusal of a gift might result in "loss of face" or in an implied insult, a gift may be accepted provided that the receiving of the gift is reported to management immediately and does not otherwise conflict with this policy.

Shall not accept employment or compensation, make investment in or engage any business or professional activity that could reasonably impair your impartial, objective, and effective performance of your work, is contrary to the company's best interests, competes with the business of the company, or would otherwise be reasonably considered a conflict of interest.

Shall not make any investments in the businesses of the company's customers, suppliers or competitors that could cause divided loyalty or event the appearance of divided loyalty. As a general rule, investment in securities traded on a recognized stock exchange does not create a conflict of interest as long as the securities are purchased on the same terms and with the same information available to the general public.

Shall select **vendors** based on business reasons verses for personal reasons or in exchange for a personal reward.

Shall not represent or discuss company affairs with the media without proper company authorization.

Shall not accept employment or engage in any business or professional activities that might require disclosure of the company's confidential information, or that of a client of the company.

Shall not use company confidential information, trade secrets, facilities, supplies, or equipment for personal gain without proper company authorization.

Shall not directly or indirectly hire, solicit or encourage to leave the company's employment, any employee consultant or contractor of the company.

Shall disclose actual or potential conflicts of interest to management as soon as you became aware of them.

Matteo Marconi, CEO  
Advanced Consulting and Engineering Iberia SL, inc.



**ACKNOWLEDGEMENT**

Please sign below signifying your understanding and acceptance of these terms.

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Print Name

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Signature

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Date



## DECLARATION OF IMPARTIALITY AND CONFLICT OF INTEREST

I the undersigned undertake to do the following:

1. Agree to declare in writing, prior to initiating an evaluation, any previous and/or present commercial interest and/or association on my own part with the manufacturer of the product to which I am assigned to evaluate.
2. Report any cases of apparent conflict of interest for me and for a A.C.&E. Iberia S.L employee/contractor/subcontractor involved in the conformity assessment process of the company.
3. Conduct an analysis of my situation at all times in terms of risk of conflict of interest.
4. Report promptly any changes of my personal situation related to risk of conflict of interest
5. I will not allow commercial, financial or other pressures to compromise my impartiality.
6. Report any personal interest that I have in any of the following organizations:
  - a. A company that is a client of A.C.&E. Iberia S.L
  - b. A company that is a direct competitor of a A.C.&E. Iberia S.L client
  - c. A competitor of A.C.&E. Iberia S.L
  - d. A supplier to A.C.&E. Iberia S.L

Personal situation	No	Yes, specify
Own more than 5% of capital shares of any of the organizations listed under item 6 above.		
Substantial relationship or link to any of the organizations listed above.		
Occasional relationship or link with any of the above organizations for which I receive, directly or indirectly compensation financial or otherwise.		
Family link with an employee working for any of the above organizations.		
Designer, manufacturer, installer, distributor or the person responsible for the maintenance of the certified product.		
Designer, implementer, operator or the person responsible for the maintenance of the certified process.		
Designer, implementer, supplier or maintainer of the certified service.		
Offer or provide consultancy* services to clients** for whom he/she performs inspection services.		
Offer or provide management system consulting services or internal audit to clients** for whom he/she performs inspections services, where the certification scheme requires the assessment of the client's management system.		

**\*Consulting:** involvement in:

- (a) the design, manufacture, installation, maintenance or distribution of a certified product or of a product to be certified; or



(b) the design, implementation, operation or maintenance of a certified process or a process to be certified, or

(c) the design, implementation, provision or maintenance of a certified service or of a service to be certified.

\*\*client: client who has requested a service from the notified body, of which the person concerned is the inspector.

Please sign below signifying your understanding and acceptance of these terms.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

