Code of Conduct for Business partners

Our drive to be the essential TIC partner for our clients, through the delivery of innovative, agile and efficient solutions, is built on our commitment to our people, the planet, and the communities in which we operate. Accordingly, we have adopted the highest standards of integrity and business ethics throughout our organization. In all aspects of our business, we respect human rights, implement fair labour principles, provide safe workplaces, and strive to minimize our impact on the environment.

We expect these same principles to be applied by our Business Partners, whether they are subcontractors or other professionals providing outsourced technical services, or suppliers providing goods and other services to Cotecna.

This Code of Conduct for Business Partners (CCBP) summarises the principles of Cotecna's Business Ethics & Compliance Code and the pillars of our Sustainability Policy, and sets out the standards we expect our Business Partners to comply with throughout their business relationship with Cotecna. In case of conflict between the Business Ethics & Compliance Code, Cotecna's Sustainability Policy, and the CCBP, Cotecna's Business Ethics & Compliance Code takes precedence.

1.1 Applicability

The CCBP applies to all Business Partners of Cotecna group companies and branch offices worldwide. The term Business Partners includes joint venture partners, subcontractors, agents, freelancers, consultants, service providers and suppliers.

Some requirements only apply to Business Partners that provide outsourced technical services, such as inspection, testing and certification, and these are clearly indicated in the relevant sections below.

1.2 Engagement

Cotecna requires its Business Partners to comply with the principles of the CCBP, or apply equivalent principles, throughout the duration of their business relationship with the company. This requirement is stated in Cotecna's contracts with its Business Partners.

Business Partners that provide outsourced technical services are required to undergo Cotecna's Business Partner due diligence process, the purpose of which is to have assurance that Business Partners are technically competent to perform the outsourced activities, and to assess the extent to which the Business Partner has policies, procedures and processes in place to ensure compliance with the CCBP principles and requirements.

Accordingly, Cotecna expects Business Partners that provide outsourced technical services to:

- Read, understand, and commit contractually to compliance with the CCBP, or equivalent principles.
- Complete, sign and return Cotecna's Business Partner Due Diligence Questionnaire
- Submit periodic Business Partner Due Diligence Questionnaires every 3 years, or other period as agreed by Cotecna
- Permit Cotecna to periodically verify the Business Partner's compliance with the CCBP
- Communicate the contents of the CCBP to relevant employees in their organization

Cotecna may wish to assist Business partners with training on the CCBP, where Cotecna deems it to be relevant.

1.2.1 Data privacy

All information, including personal data, provided to Cotecna by Business Partners will be kept strictly confidential and will be used for the purposes of 1) performing due diligence on prospective Business Partners and will not be distributed to third parties other than for the purposes of conducting background and reputation checks by suitability qualified agencies, or 2) in the course of provision of goods or services, or contractual obligations between the Business Partner and Cotecna. Non-Disclosure Agreements are in place between Cotecna and these third-party agencies. Disclosure as required by law or a competent authority is reserved. Personal Data will be processed in accordance with applicable data protection laws and regulations.

1.3 Business Partner Core Commitments

1.3.1 Compliance with laws and regulations

We expect Business Partners to comply with all applicable laws and regulations at all times. Business Partners shall not take any action, or omit to take action, that may cause Cotecna to be in contravention of applicable laws and regulations.

Cotecna expects Business Partners to implement within their organization adequate controls, processes, and systems to detect, prevent and respond to corruption, money laundering and fraud.

1.3.1.1 Sanctions

Business Partners shall at all times comply with applicable sanctions, export controls, and other related trade control requirements of Switzerland, the European Union, and the United States of America, and the jurisdiction where the Business Partner delivers its services or goods to Cotecna

1.3.1.2 Anti-money laundering

Business Partners shall at all times comply with applicable laws and regulations related to anti-money laundering issued by Switzerland, the European Union, the United States of America, and the jurisdiction where the Business Partner delivers its services or goods to Cotecna.

1.3.2 Integrity and Ethics

Business Partners are expected to operate with integrity and to implement ethical business practices in line with the principles set out in the CCBP.

Business Partners that provide outsourced technical services to Cotecna shall:

- Operate in a professional, independent, and impartial manner
- Carry out their work honestly and not tolerate any deviation from approved methods and procedures
- Ensure that where approved test methods make provision for tolerances in results, such tolerances are not abused to alter the actual test findings
- Report data, test results and other material facts in good faith and do not improperly change them, and only issue reports and certificates that correctly present the actual findings, professional opinions or results obtained.

1.3.3 Conflicts of Interest

Business Partners shall avoid conflicts of interest when providing goods or services to Cotecna. In the event that an actual or potential conflict of interest is identified, Cotecna expects the Business Partner to notify Cotecna so that actions to mitigate or negate the conflict of interest can be implemented.

Business Partners that have a commercial relationship with a client of Cotecna, or commence such a relationship during the period of their relationship with Cotecna, shall declare this relationship to Cotecna.

1.3.4 Confidentiality and Data Protection

Cotecna respects the confidentiality and privacy of clients' information and ensures processes and measures are in place to adequately protect such information. Cotecna treats all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

Business Partners shall comply with the same principle, such as in cases where confidential information is shared with the Business Partner in the course of the operations and activities performed for Cotecna.

1.3.5 Anti-Bribery

Cotecna operates a zero tolerance policy towards bribery and corruption.

Cotecna prohibits the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment or any other form of improper inducements involving government officials, clients, suppliers, or any other parties. Business Partners shall comply with this Principle of the Cotecna Business Ethics & Compliance Code.

Business Partners shall comply with all anti-bribery laws in all jurisdictions in which the Business Partner operates.

1.3.6 Reputation

Cotecna conducts itself with the highest standards of business ethics and integrity, and shall not do anything which would bring its reputation, or the reputation of the TIC Council (see note below) or the TIC industry, into disrepute. Cotecna expects Business Partners to operate in accordance with this principle.

1.3.7 Fair Business Competition

Cotecna is committed to operating its business in accordance with the principles of a free market and fair competition, and therefore abides by all applicable anti-trust and anti-competition laws and regulations.

Cotecna expects Business Partners to operate in accordance with this principle.

1.3.8 Health and Safety

Cotecna is committed to providing safe workplaces in which risk of injury and occupational health hazards are eliminated and, where they cannot be completely eliminated, suitable control measures, training and protective equipment is provided to its employees.

Cotecna expects all Business Partners to have a similar commitment to the safety of their employees and others that may be affected by their operations.

Business Partners that provide outsourced technical services to Cotecna, for example freelancers and subcontractors, shall comply with all requirements of Cotecna's HSE Framework and any stricter requirements set by the location where services are delivered, for example, client premises, ports, vessels, terminals, factories, warehouse, etc.

Business Partners acting as subcontractors are required to report all incidents, accidents, unsafe acts, and unsafe conditions via Cotecna's Safety Reporting helpline at safety@cotecna.com.

1.4 Human Rights and Fair Labour

Cotecna is aware of its social responsibility for its employees and the people, communities, and environments in which it works and respects human rights. Cotecna expects Business Partners to comply with the requirements set out below, or with equivalent principles and requirements.

Cotecna expects Business Partners to implement within their organization adequate controls, processes, and systems to detect, prevent and remedy any human rights abuses in their operations.

1.4.1 Fair Labour

Cotecna expects Business Partners to comply with all applicable employment laws and regulations and ensure that:

- Regulations regarding minimum salary / wages, compensation and other benefits, working time, rest breaks, paid holidays, maternity / paternity leave, and other employment rights are respected.
- Workers have the right of freedom of association and the right to collective bargaining.

1.4.2 Slavery, Forced and Bonded Labour

Cotecna prohibits all forms of slavery, forced labour, bonded labour, indentured labour, and any form of human trafficking. At a minimum, we respect the provisions of the United Nations' Universal Declaration of Human Rights.

Business Partners shall comply with this principle.

1.4.3 Child Labour

Cotecna prohibits child labour. We do not employ children under the age of completion of compulsory schooling (in any case not less than 16 years old). Employees aged 16-18 years old are not employed in hazardous activities.

Business Partners shall comply with this principle.

1.4.4 Equal Opportunities

Business Partners shall operate employment and employee management principles to ensure equal opportunities in the workplace. Decisions on hiring, promotion, demotion, and termination shall be based on objective criteria of competence and performance, and not on gender, ethnicity, origin, or any other personal characteristics.

1.4.5 Diversity, Inclusion and Non-discrimination

Cotecna believes that a diverse and inclusive working environment is for the good for its employees and society in general. Cotecna expects Business Partners to promote diversity and inclusion in the workplace, and to prevent discrimination on grounds of gender, ethnicity, national origin, social origin, disability or any medical condition, marital status, or any other personal characteristics.

1.4.6 Bullying and Harassment

Cotecna operates a zero tolerance approach towards bullying and harassment in the workplace. Business Partners shall prohibit all forms of bullying and harassment within their operations and shall have in place policies, procedures and systems that eliminate such behaviours and enable any instances to be identified and addressed.

1.5 Protection of the Environment

Cotecna is committed to have a positive impact on the planet, by minimising our carbon footprint, managing waste and emissions, and conserving energy and water. Cotecna expects its Business Partners to adopt equivalent goals and to incorporate these in the operation of their businesses.

Business Partners shall comply with all applicable laws and regulations regarding the protection of the environment and natural resources, such as water. Cotecna expects those Business Partners who may generate hazardous or other waste during the course of their provision of goods or services to Cotecna, to have in place waste disposal systems and practices that ensure their full compliance for all applicable regulations.

Cotecna encourages its Business Partners to minimize their carbon footprint and to implement processes to monitor and reduce their environmental impact.

1.6 Violations and Remedial Actions

In the event that a Business Partner has knowledge of any breach or violation of the CCBP, it is required to report the violation or suspected violation to Cotecna. A breach of the CCBP could arise from either the action or inaction of the Business Partner, or that of a third party.

Any breaches are to be reported to Cotecna's Compliance Helpline at compliance@cotecna.com
In assessing violations, Cotecna will take into account the seriousness of the breach, the existence or not of measures that could have prevented the breach, and the appropriateness of any corrective or preventative actions proposed by the Business Partner.

As a result of this assessment, Cotecna may decide to impose sanctions on the Business Partner, such as suspension or termination of its relationship with the Business Partner. Cotecna is obligated to report any unlawful actions to the relevant governmental law enforcement agencies.

1.7 Further Information

For any question about the CCBP and its application, Business Partners may use the following contacts:

Chief Compliance Officer compliance@cotecna.com

Compliance Phone Line: +41 22 849 78 14

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Note: The TIC Council, which was formed in December 2018 following the merger of the International Federation of Inspection Agencies (IFIA) and CEOC International, represents leading international companies and organisations in the testing, inspection and certification (TIC) industry.