

CODE OF ETHICS

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1. INTRODUCTION

EUSACERT S.L. is committed to conducting its operations with the highest ethical standards. This Code of Ethics outlines the professional and ethical behavior expected of all EUSACERT personnel, contractors, committee members, and associated individuals involved in our certification operations.

2. PURPOSE

The **purpose of this Code of Ethics** is to provide a clear framework of **principles and values** that guide the behavior, decisions, and practices of individuals and organizations. Specifically, it serves to:

1. **Establish Standards of Conduct:** It defines what is considered ethical and acceptable behavior in the organization.
2. **Promote Integrity and Honesty:** It encourages employees and stakeholders to act with honesty, transparency, and integrity in all professional interactions.
3. **Support Compliance:** It helps ensure that the organization and its members comply with legal, regulatory, and accreditation requirements.
4. **Protect the Organization's Reputation:** Ethical conduct builds public trust and enhances the credibility and reputation of the organization.
5. **Guide Decision-Making:** It offers a moral compass for making difficult or complex decisions, especially in situations involving conflicts of interest.
6. **Encourage Accountability:** It holds individuals accountable for their actions and decisions in the context of their professional responsibilities.
7. **Foster a Positive Organizational Culture:** It promotes respect, fairness, impartiality, and professional behaviour within the organization.

In the case of **EUSACERT**, the Code of Ethics is especially important to ensure **impartiality, confidentiality, and professional integrity** in all certification activities, aligning with ISO/IEC 17065 requirements and maintaining stakeholder confidence in the certification process.

3. SCOPE

This Code applies to all employees, auditors, experts, committee members, and others acting on behalf of EUSACERT.

4. RESPONSIBILITIES

All personnel must:

- ✓ Read and understand this Code of Ethics.
- ✓ Perform duties honestly and transparently.
- ✓ Avoid behaviors that could harm EUSACERT's credibility or impartiality.
- ✓ Comply with internal procedures, legal requirements, and international standards.
- ✓ Report unethical conduct or violations.

5. CORE VALUES AND ETHICAL PRINCIPLES

We are guided by the following core values:

- ✓ **Integrity:** Honesty, transparency, and accountability in all activities.
- ✓ **Impartiality:** Fair and unbiased decision-making.
- ✓ **Competence:** Delivering services with expertise and due diligence.
- ✓ **Confidentiality:** Safeguarding sensitive information.
- ✓ **Respect:** Treating clients, colleagues, and stakeholders with professionalism.

6. IMPARTIALITY AND OBJECTIVITY

Personnel shall:

- ✓ Make decisions based solely on objective evidence.
- ✓ Disclose relationships or pressures that may affect impartiality.
- ✓ Not participate in certification activities where they have provided consultancy.
- ✓ Avoid favoritism or discrimination in all assessments and decisions.

7. CONFIDENTIALITY AND DATA PROTECTION

Personnel are expected to:

- ✓ Protect client and internal data from unauthorized disclosure.
- ✓ Comply with General Data Protection Regulations and local data protection laws.
- ✓ Sign and adhere to the Confidentiality Agreement.
- ✓ Refrain from using proprietary information for personal or third-party benefit.

8. CONFLICT OF INTEREST

Conflicts of interest occur when personal, financial, or professional interests could compromise impartial judgment.

Personnel must:

- ✓ Disclose any potential conflicts of interest immediately.
- ✓ Recuse themselves from decisions or audits where a conflict exists.
- ✓ Not accept roles that could compromise independence.
- ✓ Avoid outside employment or financial interests without prior approval.

9. GIFTS, HOSPITALITY, AND BRIBERY

EUSACERT maintains a strict anti-bribery stance. Personnel must:

- ✓ Not solicit or accept gifts, favors, or hospitality that could influence decisions.
- ✓ Refuse any form of bribe or unethical incentive.
- ✓ Report any attempted bribery to management.
- ✓ Comply with the Anti-Bribery Policies.

10. INTEGRITY IN CERTIFICATION ACTIVITIES

All personnel involved in certification must:

- ✓ Perform evaluations, audits, and decisions with diligence and accuracy.
- ✓ Ensure traceability and documentation of decisions.
- ✓ Avoid shortcuts or misrepresentation of findings.
- ✓ Cooperate with internal and external audits and assessments.

11. FAIR LABOUR PRACTICES

EUSACERT is committed to upholding and promoting fair labour standards in all aspects of its operations. We believe in the dignity, respect, and rights of every individual and require that all staff, contractors, and partners adhere to the following principles:

- ✓ **Non-Discrimination:** Employment-related decisions are made based on qualifications, experience, and merit. Discrimination based on race, gender, age, nationality, religion, disability, sexual orientation, or any other protected status is not tolerated.
- ✓ **Freedom of Association:** Employees have the right to freely associate, join labor unions, and engage in collective bargaining in accordance with applicable laws.
- ✓ **No Forced or Child Labour:** EUSACERT strictly prohibits the use of forced, bonded, or involuntary labor, as well as child labor in any of its operations or those of its suppliers or partners.
- ✓ **Safe and Healthy Working Conditions:** A safe, clean, and healthy work environment is essential. We are committed to providing conditions that prevent work-related injuries and illnesses.
- ✓ **Fair Wages and Working Hours:** Compensation and working hours shall comply with national laws and industry standards. Employees must be paid fairly and in a timely manner for their work.
- ✓ **Respectful Workplace:** Harassment, abuse, and intimidation of any kind are strictly prohibited. All individuals must be treated with respect and dignity.

EUSACERT expects all personnel and partners to uphold these labour standards as part of our broader commitment to ethical conduct and social responsibility.

12. FAIR COMPETITION

EUSACERT is committed to maintaining a level playing field and upholding the principles of **fair and lawful competition**. Our actions in the marketplace must reflect the highest standards of integrity and compliance with applicable **antitrust and competition laws**.

We commit to the following:

- ✓ **Compliance with Competition Laws:** All business practices must comply with relevant national and European competition laws. This includes prohibitions against price-fixing, bid-rigging, market allocation, and abuse of dominant market position.
- ✓ **No Anti-Competitive Agreements:** EUSACERT will not enter into any formal or informal agreements with competitors, clients, or other parties that could restrict free competition or distort the market.
- ✓ **Independent and Impartial Operations:** Our certification decisions are made independently, based solely on objective evidence and compliance with established criteria. We do not allow commercial, financial, or other pressures to influence our impartiality.
- ✓ **Ethical Marketing and Communication:** All promotional activities, advertisements, and communications must be truthful, accurate, and not misleading. We do not make unfair comparisons or discredit competitors.

✓ **Respect for Confidential Information:** We will not use or disclose confidential or proprietary information of clients or competitors for competitive advantage.

EUSACERT fosters an ethical business environment that promotes innovation, transparency, and trust. Engaging in fair competition not only ensures compliance but also protects our credibility and supports the integrity of the certification process.

13. REPORTING VIOLATIONS AND WHISTLEBLOWER PROTECTION

EUSACERT encourages reporting of unethical behavior:

- ✓ Concerns should be reported to the Quality Manager, CEO, or via a confidential channel.
- ✓ Whistleblowers are protected from retaliation.
- ✓ Investigations will be conducted confidentially and fairly.
- ✓ Misconduct will be addressed with corrective actions and disciplinary measures.

14. COMPLIANCE AND DISCIPLINARY MEASURES

Violations of this Code may result in:

- ✓ Verbal or written warnings
- ✓ Suspension or dismissal
- ✓ Contract termination
- ✓ Legal action if applicable

15. REVIEW AND IMPROVEMENTS

This Code is reviewed annually and updated as needed to ensure continued relevance and alignment with applicable laws and ISO/IEC 17065 requirements.

16. ACKNOWLEDGMENT

All EUSACERT employees must acknowledge that they have received, read, and understood the EUSACERT Code of Ethics, and agree to comply with its principles and report any breaches of which they become aware.

17. REVISION HISTORY

#	Revision Date	Revision Explanation	Prepared by	Controlled & Approved by
0	08.04.2025	First Issue	Dema Hourani	Anton Elejabeitia Cilleruelo
1.				