

asi assurance
services
international

Code of Conduct

FOREWORD

Message from Senior Leadership

At ASI, we are committed to working with integrity, transparency and professionalism. Upholding the highest ethical standards is essential to realizing our vision of a world where voluntary sustainability claims are trustworthy.

ASI's Supervisory Board, Managing Director (MD) and Senior Management Team (SMT) recognize that a culture of ethics and compliance starts at the top. We lead by example, and are committed to fostering an environment where ASI Personnel not only make objective and informed decisions but also ethical ones, empowering them to contribute to our collective vision.

This Code of Conduct serves as a guiding document, outlining the expectations for appropriate conduct across ASI. It aligns with our mission of safeguarding the credibility of sustainability initiatives by providing global assurance services as well as with our core values of integrity, impact materiality, transparency, reliability, and competence, to ensure that our actions are in harmony with the principles we strongly believe in. By committing to uphold these values, we help ASI build trust with stakeholders and interested parties worldwide.

Sincerely,



Greg Swan
Supervisory Board Chair



Guntars Lagūns
Managing Director

1 Introduction

This Code of Conduct outlines the ethical principles and standards of behavior expected from all individuals working for or representing ASI in any capacity, encompassing but not limited to its staff, contractors (including assessors, technical experts, facilitators, translators, etc.), consultants, members of its Board and committees (hereinafter "**ASI Personnel**") as well as its business partners.¹

The Code is applicable to all current and future ASI entities, including ASI Assurance Services International GmbH, ASI North America PB LLC, ASI Asia Pacific Sdn. Bhd. and all their representatives and affiliates (collectively referred to as '**ASI**', or '**we**').

The Code of Conduct is aligned with ASI's core values of integrity, impact materiality, transparency, reliability and competence. These values guide our actions as we work towards our vision of a world where sustainability claims are trustworthy.

By upholding these values in our day-to-day work, we build trust, credibility and value for our stakeholders.

¹ Business partner refers to conformity assessment bodies (CABs) that are approved/accredited or are in the application process for approval/accreditation by ASI, as well as any organization/entity/individual that has a contractual relationship with ASI to represent its interests.

2 Commitment & Declaration to the Code

ASI Personnel and ASI business partners (collectively referred to as '**you**') shall review this Code of Conduct, confirm their understanding of its content and affirm their commitment to uphold it.

This obligation applies when individuals join the organization, perform duties on behalf of ASI or express interest in working with ASI. Additionally, ASI Personnel shall reaffirm their commitment annually.

By adhering to the ethical standards set by this Code of Conduct, you contribute to fostering a robust culture of integrity within our organization. This commitment ensures that ASI continues to uphold the highest standards of ethical conduct in all its endeavors.

3 Our Values

The values of ASI are indispensable for:

- 1) fostering a culture of best practice,
- 2) cultivating trust with our stakeholders,
- 3) maintaining our reputation for reliability, and ultimately,
- 4) driving our success.



INTEGRITY

We uphold integrity by being independent, impartial, ethical and respectful.



IMPACT DRIVEN

We bring value to our clients through relevant and effective solutions.



COMPETENCE

We drive success through specialized and skilled team.



TRANSPARENCY

We hold ourselves accountable by promoting and applying transparent practices as a basis for collaboration, learning and trust.



RELIABILITY

We deliver what we promise as a partner that can be relied upon.

Each of these core values is vital in strengthening our institutional culture, guiding our actions, and elevating the value of the services we deliver.

4 Basic Principles - doing what is right

As a trusted international assurance provider, ASI is responsible for maintaining its reputation and setting the highest standards by complying with all applicable laws within its global reach. This includes areas like:

- **Anti-bribery and corruption** - we prohibit bribery, kickbacks, and improper payments in all forms. Even small facilitation payments are strictly prohibited.
- **Data privacy protection and security** - we implement stringent controls to protect personal information, ensuring that it is handled responsibly and securely, and respecting data privacy rights. See ASI public Data Privacy Policy ([ASI-POL-20-100](#)).
- **Maintaining Confidentiality** - we handle all confidential information responsibly. Confidential data is only shared on a need-to-know basis and appropriate authorization is obtained before disclosure.
- **Fair competition** - we engage in ethical competition, avoiding collusion, the exchange of competitive information, or the abuse of a dominant position. We actively discourage any form of anti-competitive conduct.
- **Financial integrity** - we ensure that our books and records accurately reflect all transactions and that internal controls are in place to safeguard assets and prevent fraud.

Violations may result in legal consequences (see section 6 below); however, it's vital to recognize that even perceived misconduct can harm ASI's reputation for integrity, credibility, independence, and professionalism.

You are expected to grasp the responsibilities pertinent to your roles, exercise sound judgment in all situations to uphold ASI's reputation, and seek guidance when uncertain.

5 Work Ethics - treating people right

You are expected to demonstrate the highest standards of conduct, emphasizing honesty, reliability and ethics in all professional interactions. This includes:

a. Diversity

We strive to maintain a high degree of diversity at ASI. It fosters innovation, enriches perspectives, strengthens decision-making processes, and creates a more inclusive, tolerant, and competent atmosphere.

b. Non-discrimination

We provide equal opportunities without engaging in discrimination based on race, gender, age, disability or other protected characteristics. Our commitment extends to ensuring equitable treatment for all business partners, free from any discriminatory practices.

c. Mutual respect and respect for human rights

We consistently engage with each other and stakeholders, in a manner that emphasizes dignity, respect, and mutual understanding. This approach extends to a firm dedication to honoring and upholding human rights in all our actions and decisions. We maintain a zero-tolerance policy towards any form of harassment - including sexual harassment - ensuring that our environment remains respectful and empowering for all.

d. Freedom to Speak Up

We believe in the power of collaboration and continually encourage you to contribute with ideas for improvement and innovation. Your opinions, critiques, and suggestions are invaluable, and we welcome you to voice them freely regardless of the level of seniority or individual role.

e. Safeguarding our Reputation

ASI's independence and objectivity are central to providing credible assurance services. In this context, our reputation is our most valuable currency. We proactively identify and avoid both actual and perceived conflicts of interest that could undermine our impartiality.

By adhering to the standards above, you contribute to a respectful organizational culture and enhance ASI's reputation globally.

6 Code Reporting and Violations

We strongly encourage you to actively participate in upholding the integrity of an ethical workplace culture at ASI by promptly reporting any instances of misconduct, unethical behavior, or any violations of this Code of Conduct that you observe or suspect.

If you find yourself unsure about whether a particular action or decision aligns with our Code of Conduct, reflect on the following questions:

Have I, or has another person acknowledged all relevant elements and deliberated them thoroughly to the best of my understanding?

Can I confidently assert that my decision or that of another person abides by the law and adheres to our internal procedures and guidelines?

Is my decision or that of another person impartial, aligning with the best interests of ASI, and devoid of any conflicting personal interests?

Can I make this decision with a clear conscience, and can the other person do so in full alignment with our values?

Would I feel comfortable defending my decision to external parties, or would that of another person be equally defensible?

In cases of uncertainty, please contact the ASI Compliance Officer or Compliance Committee. Concerns and suspected or actual violations of the code may be reported via two channels ensuring confidentiality at all times and full anonymity (if Whistleblower Channel is used):

- To the Compliance Committee via email to compliance@asi-assurance.org, also available for ASI business partners
- Through an anonymous ASI Whistleblowing Channel, only available for ASI Personnel at <https://asi-assurance-services-international.personiowhistleblowing.com/>

Please refer to the ASI Whistleblowing Policy ([ASI-POL-20-255](#)) for further details.

ASI shall investigate all reported concerns maintaining confidentiality to the extent possible throughout the process and shall treat whistleblowers with dignity and respect. Failure to cooperate or providing false information during an investigation can itself be considered a violation of this Code.

Retaliation against any person who raises a concern in good faith is strictly prohibited.

Violations of the Code of Conduct will not be tolerated, and may result in disciplinary actions proportionate to the violation and in accordance with applicable laws, including but not limited to:

- Verbal or written warnings
- Mandatory training or coaching
- Termination of contractual agreements

Enforcement of the Code applies equally to all ASI Personnel and ASI business partners, regardless of position or tenure. ASI is committed to consistently enforcing the Code, fostering a culture of integrity and ethics throughout the organization.

7 Continual Improvement

ASI is committed to regularly reviewing and improving our ethical policies and practices. We will update this Code of Conduct as needed and notify you of any changes.

Suggestions to strengthen our Code of Conduct or ethical culture may be submitted via email: compliance@asi-assurance.org.

Approved by ASI Supervisory Board on 02 May 2024.



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