

bsi.

● Code of Business Ethics

British Standards Institution



Companies House number ZC000202



Contacting the Compliance and Ethics Team and Raising Concerns

Doing the right thing and speaking up helps protect BSI, our integrity and our reputation.

BSI is committed to an environment where employees feel comfortable to share their views and raise their concerns. We speak up promptly and report conduct that we believe, in good faith, violates laws, regulations, internal policies or this Code of Business Ethics.

Don't support it. Raise it.

There are multiple channels to raise concerns, including to line managers, Group Legal, or Human Resources.

The Compliance and Ethics Team may also be contacted to report concerns either via telephone or online via a web form. Reports can also be made anonymously.

Website

www.safecall.co.uk/en/clients/bsi

Email

compliance@bsigroup.com

No retaliation

All reported concerns are treated in strict confidence to the maximum extent possible, and BSI does not tolerate retaliation against any employee who reports a concern in good faith. Protection against retaliation is also extended to those who assist in any investigation of such concerns.

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● Letter from our Chairman

At BSI, our purpose and values guide every action we take, both on an individual level and as a business. This clear view of what we stand for and why we are in business allows us to navigate effectively through the ongoing, fast-paced, social and technological change shaping the world today.

Our guiding principle is that we are all accountable for our own conduct and actions. Each of us has a role to play in living up to our values of integrity, expertise, and respect and the standards set out in our Code of Business Ethics.

Our Code has been approved by our Board of Directors and its purpose is to support BSI's commitment to operating in an ethical manner. We operate with integrity, expertise, and respect, putting our clients and stakeholders at the forefront of everything we do. If we believe we have been asked to do something that is illegal, unethical, or violates this Code or any BSI policy, we speak up and raise our concerns.

Managers lead by example, setting clear expectations around the standards of conduct to which all employees are required to adhere. We are all responsible for maintaining BSI's reputation, which we can do by following the Code and using our best judgment.

Not all situations have a specific guideline to support our actions, nor can this Code address all the decisions and potential dilemmas that we may face. This is why all of our decisions are guided both by applicable laws and regulations and internal guidelines, and by our own informed assessment of the right thing to do.

Please ensure that you read the Code of Business Ethics carefully. If you have any questions or concerns, please contact the Compliance and Ethics Team. At BSI we have a culture of respect and collaboration, and if something doesn't feel right, it is better to speak up than remain silent. That honesty and transparency is at the very heart of who we are as a business.

John Hirst
Chairman

January 2023



"Each of us has a role to play in living up to our values of integrity, expertise, and respect and the standards set out in our Code of Business Ethics."

Purpose

The British Standards Institution, together with its subsidiaries (“BSI”) believes in challenging complacency and helping organizations make excellence a habit. We are an independent, non-profit distributing organization, established under Royal Charter. Our responsibility to business and society has been a part of BSI’s role since our inception in 1901. We are committed to making a positive impact both through our own actions and by helping others to enable a resilient world.

Values

Our values are more than just words, they are the cornerstone of how we live our Purpose and Mission, and they guide us in the way we do things at BSI.



Integrity

As a Royal Charter company, BSI is a completely independent organization, with no vested interests driving our agenda – so all parties can work confidently with us. We act with impartiality, transparency and professionalism and employ rigorous and consistent standards in everything we do. We always aim to do the right thing and we are prepared to take difficult decisions to achieve this goal.



Expertise

We are thought leaders and recognized experts in our fields. We nurture expertise and excellence in our teams, in how we operate, and in the services that we offer. Our expertise helps clients to perform better, innovate for their future growth and create lasting value.



Respect

BSI is a diverse and inclusive organization where everyone can feel welcomed, included, and able to give, and be, their best. We listen to the ideas and needs of our clients, colleagues and all our stakeholders. We believe that everyone’s contribution matters and that embracing our differences drives success.

Behaviours

We put the client at the centre of everything we do to deliver outstanding products and services. In an ever-changing world agility is key not just in terms of actions but in terms of thinking creatively and finding new and better ways of doing things so we can continue to exceed our clients’ expectations. To provide integrated solutions to our clients’ we need to collaborate across the organization and act as one team.

- Client centric.
- Agile.
- Collaborative.





Overview: Our Code of Business Ethics

Maintaining the highest standards of ethical conduct is at the heart of how we do business. Our Code of Business Ethics (the “Code”) lays out the standards and behaviours that are expected of each of us. It guides us in acting responsibly and ethically in everything we do.

As employees of BSI, we are each responsible for understanding and complying with our Code, along with the commitments, laws and regulations that relate to our business activities, and the workplace policies and processes that address them. Within our Code, you will find examples of situations you might face in your day-to-day work and advice on where to get information and support if you are ever unsure what to do.

While our Code can act as a guide, we expect all employees and business partners to understand and follow the principles in their day-to-day business and make ethical decisions in accordance with the letter and spirit of our Code.

Who must follow our Code?

All employees and BSI’s Board of Directors must follow our Code. Each of us, wherever we work, is required to behave in accordance with the standards outlined in our Code when dealing with colleagues, business partners, clients, suppliers, contractors, competitors, and other stakeholders.

We encourage our business partners, contractors, and suppliers to adopt the same or equivalent standards of ethical business conduct as set out in our Code and BSI’s Sustainability Code.

Our Code in context

Our purpose and values are the foundation of our success. Our Code underpins our ability to behave in a manner consistent with our values.

Our Code is not meant to provide specific guidance on every situation in which we may ask, “what is the right thing to do?”. Instead, it is principle-based guidance that encourages consideration of difficult questions, consultation, engagement, and speaking up if we have concerns.

Since our Code is at the core of everything we do, we bind ourselves to its spirit with all those we do business with. Our Code is to be incorporated into all contracts with our clients. It should also be included in all contracts with business partners, consultants, agents, suppliers, and any other person with whom we seek support for our business objectives (unless there are already equivalent and adequate provisions).

Our Code applies everywhere we operate and is supported by workplace policies, procedures, and practices, which may vary to take account of local requirements and legislation. To the extent any local law or regulation is more restrictive than our Code, that local law or regulation governs.

We will comply with all relevant laws and regulations in each of the locations in which we operate. Each of BSI’s employees, business partners and representatives is expected to understand how these laws affect their own individual work responsibilities.

What happens if I don’t comply with our Code?

The standards laid out at the beginning of each section of the Code support the relevant BSI policies which are embedded within our Compliance Framework. Failure to comply with our Code amounts to a failure to comply with BSI’s policies and processes, values and behaviours and may result in disciplinary action, which could include dismissal without notice.



Commitments under our Code

BSI is committed to ethical conduct in all its business activities and relationships. Every individual in BSI shares the responsibility to work to the standards set in our Code and to conduct our business in a professional, safe, ethical, and sustainable manner.

This is without exception or compromise. Our Code brings together our policies on compliance and ethical issues and applies to all of BSI's employees, business partners, and any other person or organization who performs services for or on behalf of BSI in any location around the world.

Our Code sets out BSI's commitments, the individual responsibilities we all have as employees and representatives of BSI, and the additional responsibilities of managers and supervisors.

BSI Commitments

BSI commits to supporting employees by:

- Providing a clear set of policies, standards and behaviours which define expectations across all our countries and operations.
- Respecting the human rights and privacy of our employees in the workplace.
- Enabling employees by providing appropriate training, guidance, and information.
- Creating an inclusive, positive, supportive, open work environment where employees feel able to speak up and report issues and concerns without fear of retaliation.
- Providing reporting channels for raising concerns including access to a third-party hosted "SpeakUp" service.
- Listening and responding to issues and concerns in good time.
- Not tolerating retaliation or discrimination against those who have raised concerns.
- Encouraging our suppliers, contractors, and other business partners to adopt the same or similar standards of ethical behaviour.

Employee responsibilities

We are all expected to take responsibility for doing the right thing.

Knowing what to do:

- Be familiar with our Code and know where to find information and support.
- Understand BSI's policies and processes and our responsibilities in respect of them.
- Engage only in actions that are ethical, legal, and meet the standards and expectations of our Code.

Behaving responsibly:

- Be committed to treating people professionally and with respect.
- Conduct business relationships in an open, honest, and transparent way.
- Ensure relevant third parties are aware of, and comply with, the standards, values and behaviours set out in our Code.
- Comply with all applicable laws and regulations, including their spirit and intent.
- Respond to any warning signs that come up in your own work or the work of others.
- Seek guidance if you are not sure what to do or you have seen or heard something that does not feel right.
- Speak up where you have a concern or think there may be a problem.
- Support your colleagues in doing the right thing.
- Take active steps to understand training requirements, including completing mandatory training.
- Never retaliate against colleagues who speak up with a concern.

Additional manager or supervisor responsibilities

Setting an example:

- Act with integrity, displaying the high standards of conduct expected.
- Clearly show that doing the right thing is important to you.
- Create a positive, inclusive working environment where everyone can give their best.
- Foster a culture in which your team feels comfortable raising concerns and asking for advice.

Being accountable:

- Ensure our Code is made available to, explained to, and understood by your team.
- Support your team in making ethical and responsible decisions.
- Support your team in complying with all applicable laws and regulations.
- Hold yourself and your team accountable if they don't meet our Code's standards, our policies, or any applicable laws.
- Act promptly when a member of your team raises a concern.
- Ensure reported concerns are kept confidential and never take it upon yourself to investigate the matter.
- Take action to protect members of your team from retaliation if they speak up.
- Ask for advice if you do not know how to handle or respond to an issue or concern raised.
- Support your team in understanding training requirements and completing mandatory training on time.



Speak Up

It may feel easier to remain silent or ignore behaviour you think may not be within the spirit of our Code, but none of us should ignore a legal or ethical issue that should be addressed, whether actual or just perceived.

Each of us has a responsibility to report any potential or actual breaches of our Code or any behaviour which is contrary to our values and business principles. This duty applies whether it is you directly or if you become aware of an issue involving a colleague or any third party connected in any way with BSI.

You are encouraged to seek advice or raise your concerns about business conduct related issues.

You should speak up any time you:

- Have questions about a situation or need advice.
- Want to report something that you believe doesn't comply with our standards or the law.
- Think an issue that's been reported is not being dealt with properly.

Often an issue can be resolved by speaking with the person concerned. Your manager, supervisor, People representative or Group Legal can also help you find the right way to raise or address an issue.

Alternatively, if you would like to remain anonymous when reporting a concern, BSI has in place a confidential free telephone line operated by an external, independent company that specialises in operating confidential telephone reporting systems. The telephone numbers and access to web reporting can be found on the SpeakUp page on BSI's internal intranet and on BSI's website:

www.bsigroup.com

You do not have to be an employee of BSI to contact the SpeakUp service. We would encourage anyone who has an issue or concern related to BSI to raise it as soon as possible.

It's important to report any concerns, even if you are not sure that there is a problem, as soon as possible. If you have a genuine issue or concern, then it is important that you raise your concern.

We protect against retaliation. If you report a concern, it will be handled with appropriate confidentiality and discussed with others only as needed or advisable under the circumstances. We do not tolerate any retaliation with regards to concerns raised in good faith. Retaliation includes an employee being dismissed, demoted, suspended, intimidated, harassed, excluded, denied training, or given poor evaluations.

Our aim is to ensure that all our employees, business partners, and other stakeholders feel comfortable and have a safe space to raise any concern.

● Our Workplace Responsibilities

A man in a grey t-shirt and blue trousers is working in a factory. He is wearing grey work gloves and is holding a tablet computer in his left hand, looking at it intently. His right hand is reaching towards a large number of shiny, cylindrical metal parts that are arranged in rows on a workbench. The background is slightly blurred, showing other workers and industrial equipment in a factory setting.

Fair treatment and equal opportunities

We are inclusive and celebrate equity and diversity. We embrace our differences. We ensure all voices are heard, and everyone is treated with fairness, dignity, respect, empathy, and compassion. These form the basis on which we build relationships with others. Together we create an environment where all feel welcomed and supported and where there are equal opportunities and equal access.

We do not treat each other more or less favourably on the basis of race, colour, national or ethnic origin, religion, sex, gender identity or expression, disability, sexual orientation, age, marital status, or any other protected characteristic.

We afford everyone the same human respect, irrespective of position, status, or form of contribution. We recognise that we all have our own biases, and we take account of these in our decision-making and interaction with others. We respect the rights of individuals to freedom of association and collective bargaining.

The culture we want everyone within BSI to experience requires each of us to actively demonstrate our commitment to it.

We need to be actively and consciously inclusive if we are to deliver the equality of experience that each of us is entitled to. We always seek out and support a diverse population for every role or opportunity.

We will:

- Set a good example by treating our colleagues with dignity and respect, and in the manner, we would like to be treated ourselves.
- Listen to one another, and encourage, respect and value input – even when views differ from our own to create a work environment in which we all feel we can speak up.
- Be aware of the impact our words and actions can have on others.
- Be interested in, and demonstrate respect for, cultural differences and seek to develop our understanding of these differences.
- Show an understanding of the difficulties that others may face in their lives which we may not, and show empathy and support for others.
- Create an environment in which each of us is able to bring our whole self to work and to discuss our personal circumstances if we choose to do so.
- Where possible and appropriate, support flexible work arrangements and workplace adjustments, balancing business, team, and personal needs which are applied on an equal and fair basis among members of the team.
- Actively look for opportunities to show appreciation and give thanks for our colleagues' contribution.
- Not tolerate harassment through any means, including verbal, nonverbal, physical, or online. Abusive, offensive, humiliating, or intimidating behaviour is never acceptable. We each have a personal responsibility not to behave in this way and, where possible, to discourage such behaviour in others.
- Recognise that these standards of behaviour are expected at all times both inside and outside the workplace, whether working in a BSI office, at client locations, online, working from home or otherwise. This includes company social events and interacting with work colleagues or work-related third parties.
- Manage our online presence in line with our expected standards of workplace behaviour and any relevant company policies.
- Report any instances of breaches of our commitment to equal opportunities. Do not be afraid to speak up – we all have a responsibility to address issues that we become aware of.



Working without bullying and harassment

Bullying and harassment have no place in BSI. Bullying and harassment include slurs, offensive remarks, inappropriate jokes, and any other conduct. This conduct may be online, visual, verbal, physical or other, that could create an intimidating or uncomfortable work environment, including suggestive language or behaviour. This extends to all interactions and modes of communication, including electronic communication and social media.

Examples of bullying and harassment:

- Jokes about race, ethnicity, religion, age, gender identity or sexual orientation.
- Distribution, display or the keeping on company property any material which could be considered by anyone, as offensive including emails, cartoons, photos in physical form or through social media.
- The spreading of malicious rumours, derogatory or discriminatory comments by any means - email, voicemail, or other social media.
- Openly discussing co-workers' salaries or other confidential benefits.
- The misuse or open disclosure of personal information.
- Offensive, intimidating, insulting or malicious behaviour of any kind.

This is not an exhaustive list and other conduct may fall within the classification of harassment or bullying depending on the circumstances in which it occurs. All forms of harassment or abuse conflict with BSI's values and company policy and we will not tolerate them.

If you believe you are being bullied or harassed, or are aware that someone else is, please report the matter as soon as possible to a line manager or People representative.



If you see something that's not right, speak up and raise your concern – seek advice or report it confidentially through the Compliance and Ethics Team.

Health, Safety, and Wellbeing

Our people make us a great company to work for and do business with, and a company with a reputation for high standards and quality. Our people are our most valuable asset, the key to the success of the business.

We all have a personal and collective responsibility to create and maintain a safe and secure workplace. We have an obligation to safeguard each other, our clients, and the environment by operating an injury-free, healthy workplace which minimises our environmental impacts.

We are committed to providing a safe and secure working environment to all employees and to promote best practice globally.

We seek to prevent injury to any employee or client. We also expect similar high standards from our business partners and contractors.

We believe that a commitment to safety requires a balanced approach from both management and our employees.

Health and Wellbeing

Taking care of ourselves both mentally and physically allows us to be at our best at work and home. BSI will promote and support health and wellbeing across our locations through a variety of programmes. When issues are affecting our wellbeing, we should seek support through the channels available.

We will:

- Know and comply with applicable health and safety rules, legislation, security procedures and all local requirements as a minimum.
- Understand the risks and hazards in our workplace and daily operating environment.
- Identify safety concerns and improvements and report all issues promptly.
- Take responsibility for our own safety and the safety of those around us, the work we do and the area we work in.
- Take care of our mental and physical health.
- Never conduct business, drive, or operate machinery when under the influence of alcohol or illegal drugs.
- Act immediately if someone is putting themselves or others in harm's way.

● Our Anti-Bribery and Corruption Programme



Anti-Bribery and Corruption

Bribery or corruption in any form is unacceptable to BSI and we are committed to transparency in all our business dealings. We will never offer, give, request, or receive bribes or other inducements, either directly or through a third party. Even the suggestion of corruption may damage the reputation of BSI and affect our ability to do business.

A bribe includes any direct or indirect payment, benefit or gift offered, given, requested, or received with the purpose of improperly influencing a decision or outcome. The benefit does not necessarily have to be of large value. It could be as simple as a lunch or an invitation to a sporting event. Nor does a transaction need to have taken place for it to be considered a bribe. Payments, gifts, or other benefits provided to or through a third party such as a decision maker's relative or business partner, could also be a bribe under certain circumstances.

We are committed to creating a working environment in which all our people uphold the highest standards of integrity and professionalism. This is particularly important in our dealings with any government, state, public or local authority officials in any country.

We have zero tolerance for any fraudulent, dishonest, or deceptive activities or behaviour and have in place a robust Anti-Bribery and Corruption Policy, which can be found in the following link:

www.bsigroup.com/globalassets/documents/about-bsi/ethics-and-social-responsibility/anti-bribery-and-corruption-policy-external.pdf

We comply with all applicable anti-corruption laws including, but not limited to UK Bribery Act 2010. It is expected that our business partners, clients, and other stakeholders understand and comply with the relevant anti-bribery and corruption laws within the jurisdiction in which they operate.

We will:

- Never tolerate or condone bribery or other forms of corrupt activity.
- Never offer, give, request, or receive any payment, benefit or gift which is intended to be, or may be construed as, a bribe, or allow others to make or receive improper payments on our behalf.
- Never offer or make any unauthorised payments.
- Never attempt to induce anyone to do something illegal or improper.
- Always report any suspicions or knowledge of improper payments being offered or received.

Sanctions

Financial and Trade Sanctions (collectively Sanctions) are some of the measures applied by individual countries, International Organisations or Regional Bodies to fight aggression, terrorism, criminal behaviour or violations of human rights. These Sanctions are intended to motivate a change in behaviour by the individual, regime or jurisdiction concerned or to deprive terrorists and criminals of access to funds.

We must not provide funds or services, directly or indirectly, to those subject to Sanctions. A failure to comply with these obligations can carry serious consequences, including criminal penalties against BSI and its colleagues.

BSI shall not be obligated and may refuse to perform, deliver, procure or make available any service in, to or from any jurisdiction or legal person that will or may violate, or risk BSI becoming exposed to any Sanctions.

We will:

- Take appropriate action where suspicious or criminal behaviour is observed and reported. We do not conduct any activities in breach of applicable financial and trade sanctions or undertake services that assist clients in breaching applicable sanctions laws.
- Actively monitor and review our client engagements to ensure compliance with sanctions and taking the appropriate action, including declining new relationships or ceasing existing relationships.





Facilitation Payments

Facilitation payments are payments of sums of money or gifts given to a government official (or other person) as a way of influencing that they perform their duty either more promptly, or in a certain way, or at all, for example, to secure the expedient release of shipments held in customs.

Under UK law, and under the laws of many jurisdictions in which we do business, facilitation payments are considered to be bribes. The giving of facilitation payments by BSI employees is prohibited. You should not make such payments, even if they are for nominal or trivial amounts or are customary in the country in which you operate.

Examples of bribes, corruption, and facilitation payments:

- Consultancy fees and commissions to parties not actually performing services.
- Payments in-kind including any non-cash items of value such as travel, hospitality, entertainment, employment opportunities, and gifts.
- Employment of family members outside the normal hiring process.
- Employing an individual primarily because they are the relative of a key business partner.
- Artificially increasing the price of some elements of a bid in order to allow for kickback payments.
- Paying to expedite a routine government action.

We will:

- Not make facilitation payments and will not allow others to make facilitation payments on our behalf, unless life or physical safety is threatened.
- Report any requests to make facilitation payments.
- Take action to combat the practice of facilitation payments in countries in which we do business.

Money Laundering (or Laundering)

Money laundering is the process by which criminals or criminal organizations attempt to disguise the origin and/or ownership of money obtained illegally, such as through criminal activities or by transferring it via legitimate parties or accounts so its origins cannot be traced. It can also be a key component of the financing of terrorism.

Through a process of placement; layering; and integration, money may be filtered through a series of transactions so that it can be extracted from the financial system and used without suspicion.

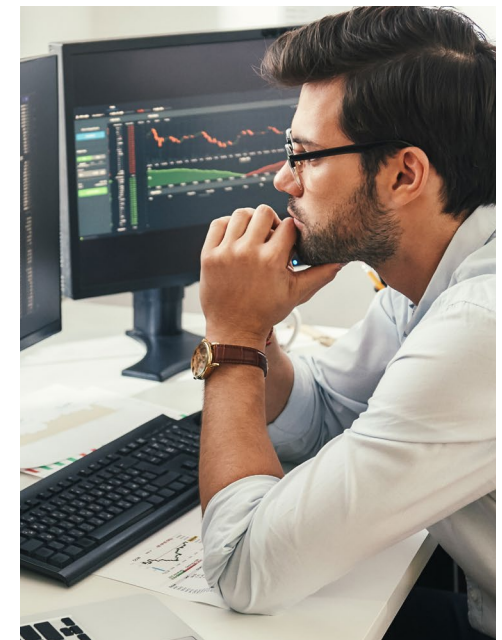
The process of laundering money typically involves three steps: placement, layering, and integration.

- Placement surreptitiously injects the “dirty money” into the legitimate financial system.
- Layering conceals the source of the money through a series of transactions and bookkeeping tricks.
- In the final step, integration, the now-laundered money is withdrawn from the legitimate account to be used for whatever purposes the criminals have in mind for it.

Note that in real-life situations, this template may differ. Money laundering may not involve all three stages, or some stages could be combined or repeated several times.

We will:

- Not accept payment for services performed under contract in the form of cash, travellers' cheques, or money orders.
- Only accept payments from clients to be drawn on bank accounts held in the name of the invoiced client.
- Only make payments to a supplier or other third party to a bank account titled in the name of the contracted third party.





Gifts and Corporate Hospitality

We will never (nor will we allow others to do so on our behalf) offer, give, or accept any payment, benefit, gift, or hospitality, regardless of value, that: is intended to be or may be construed as a bribe; is in return for business or confidential information; or may improperly influence a business activity.

Giving and receiving gifts or hospitality can help build goodwill in business relationships, but they are only appropriate in limited circumstances.

Consider the following points when faced with an opportunity to give or receive gifts or hospitality:

- What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
- Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
- Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
- Have you checked to see if the gift/hospitality is lawful in the country of both the recipient and the benefactor?
- Have you checked if the recipient of the gift or hospitality is allowed to receive a gift under their own employer's gifts policy?
- Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

Under no circumstances should any gift or hospitality be exchanged with any government, state, public or local authority officials in any country.

Accepting gifts

In some countries and cultures, it may be customary to accept a gift that is offered to you but would otherwise be in breach of our Code. In such circumstances, the approval of your line manager should be obtained before you may formally accept the gift, and a decision will then be made on whether the gift can be retained.

It is expressly forbidden to accept or give any gifts of cash (or cash equivalents such as a bank cheque, money orders, investment securities or payment of personal bills or expenses).

Some kinds of gifts or hospitality will never be considered acceptable.

You should not give, offer, receive, or approve any:

- Gifts or hospitality involving third parties involved in any competitive bid or tender process in which BSI is, or may be considered to be, involved.
- Giving a client a gift without following our approval processes.
- Receiving a lavish gift or hospitality from a supplier who is competing for a contract you will award.
- Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses.
- Any hospitality that might be in breach of our Code or may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on BSI's internal and external reputation.
- Repeated gifts and hospitality, although individually within policy limits, from the same third party.
- Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

We will:

- Give any gifts and hospitality only in good faith and ensure they are occasional, appropriate, and reasonable, and comply with any applicable laws.
- Ensure gifts and hospitality offered or received are within BSI's financial limits.
- Seek approval, where required, for a gift or hospitality.
- Account accurately and transparently for any gifts or hospitality, and ensure they are recorded in the relevant Gifts and Hospitality Register.
- Ask for guidance from Group Legal or Corporate Compliance if you are unsure about giving or receiving a gift or hospitality before taking action.
- Ask for guidance if you are concerned about colleagues receiving or giving excessive gifts or hospitality.
- Never give payments, gifts, or other benefits through a third party, such as a decision maker's relative or business partner.



Conflicts of Interest

We will declare if there is an actual or perceived conflict between our personal interests and our responsibilities to BSI.

Conflicts of interest are situations in which competing interests may impair our ability to make objective and unbiased business decisions in the best interest of BSI. A conflict of interest occurs when an individual's personal interests could compromise their judgement, decisions, or actions in the workplace. Even the perception of a conflict of interest can cast doubt on our integrity and could damage BSI's reputation.

Conflicts of interest can arise through non-BSI work interests, activities, and affiliations (paid or unpaid); undertaking employment or advisory roles with other companies whilst employed by BSI; or through affiliations to other organizations.

For example:

- Having a financial interest in another company or organization.
- Holding a directorship or consultant position.
- Performing services outside of your BSI role.
- Having a second job.

If any of the above relate to a company or organization that may be considered a competitor of BSI or a client, contractor or supplier to BSI, a conflict of interest could arise. Arrangements of this kind are never allowed – you should not work or provide services for any company or organization that you deal with in your role at BSI.

If you are considering taking on additional work outside of BSI that may result in a perceived or actual conflict of interest, you should discuss this with our line manager with a view to seeking written approval before taking on the additional role.

Working with close relatives: if you become aware that a close relative works for BSI or provides services to a competitor, client, contractor, or supplier, you should discuss the matter with our line manager.

As a general rule, a relative should not have any business dealings with you and where at all possible, with anyone in our department or anyone who may report into you.

We will:

- Ensure our business judgement is free from bias, conflicts of interest or undue influence of others.
- Follow processes and procedures to identify and address any actual or perceived conflicts of interest.
- Take conflicts of interest very seriously and follow appropriate procedures when conflicts do occur.
- Understand that conflicts may arise from time to time, therefore we expect you to seek advice when appropriate and make sound decisions.

Political Activity

BSI is an independent, apolitical organisation and it is important for it to be free from party political bias, and to be clearly seen and acknowledged as being free from such bias.

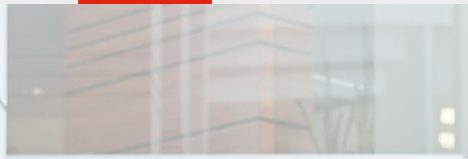
It is therefore inappropriate for staff to make reference to BSI, its policies, funding, management or other dealings in the context of party political speeches, literature, party events or other forms of party political activity. Taking account of BSI's status as the UK National Standards Body, staff must avoid party political activities which may reasonably be regarded as having the potential to impair their ability to perform their duties in an impartial manner.

We will:

- Not make a donation on behalf of BSI to any political organization which promotes party political activities.
- Keep any personal political interests, activities or affiliations outside the workplace and do not use company time and resources to support them – please refer to the guidance on Conflict of Interest.
- Be aware of and comply with all requirements of law, regulation, and internal policy regarding lobbying wherever we operate.
- Not use charitable donations as a substitute for political payments.
- When participating in the political process as an individual, including making political contributions, always make it clear that our views and actions are our own and not BSI's.
- Not engage in lobbying activity or have contact with legislators, political candidates, regulators, government employees or public interest groups, unless with the approval of BSI's Board.



● Our Business Responsibilities



Impartiality

BSI recognizes the importance of our business areas collaborating to offer a full range of solutions to clients worldwide, namely our 'Team BSI' approach, but such collaboration must not compromise the neutrality and independence of the National Standards Body nor that of our Regulatory Services and Assurance Services divisions which carry out conformity assessment.

The Impartiality Code of Conduct outlines BSI's core obligations under its governance documents, law, regulation, and obligations to BSI's accreditation authorities. It is an internal document which supports the understanding of and adherence to our impartiality obligations.

We will abide by the requirements and principles as stated in the Impartiality Code of Conduct and supporting Global Procedures.

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If you see something that's not right, speak up and raise your concern – seek advice or report it confidentially through the Compliance and Ethics Team.

Bidding and Contract negotiation

We will behave responsibly when competing for a client's business and when engaging with clients, business partners and suppliers.

When bidding for or negotiating a contract we will:

- Approach business with honesty, integrity, and openness.
- Be truthful, accurate and clear in our statements, communications, or representations.
- Disclose information required by law or regulation.
- Observe the laws, rules and regulations that apply to procurement activities.
- Not request or accept information on a competitor's bid or proposal that we know to be proprietary or restricted from disclosure by law or regulation; or could create an actual or perceived conflict of interest.



Competition Law (Anti-trust)

Competition law regulates dealings with competitors, customers, distributors and other third parties around the world. It prohibits agreements, arrangements and concerted business practices which appreciably prevent, restrict, or distort competition (or have the intention of doing so).

BSI takes its compliance with competition law, sometimes referred to as anti-trust law, seriously. Breach of these laws may result in manipulation of the market beyond normal market forces, potentially harming participants in that market, consumers, and even other markets.

Laws on competition may vary from country to country and some laws can even apply to business conducted outside the primary legal/operational jurisdiction. The consequences of breaching competition law can be severe for both companies and individuals.

One of the factors that is often considered by authorities when reviewing whether or not a company has engaged in anti-competitive practices, is the market share that the company has. It is not generally considered anti-competitive to be a success or to be the dominant party within a particular market. However, it is illegal to use anti-competitive means to acquire or maintain a monopoly or dominant position, or to abuse that position.

Examples of anti-competitive behaviour:

- Sharing a supplier's pricing details or other contractual terms with another company.
- Sharing details of pricing or contract offering with competitors on a bid.
- Agreeing with a competitor not to bid for a particular contract so they withdraw from the next one.

We will:

- Comply with competition and anti-trust laws.
- Not discuss pricing or other commercially sensitive information with competitors in breach of competition and anti-trust laws.
- Not engage in any form of discussion, correspondence, agreement or understanding with a competitor or potential competitor to fix prices, rig bids, allocate customers or market or restrict supply in breach of competition or anti-trust laws.
- Never artificially set prices below total costs with the intention of pushing a competitor out of the market.
- Report any potentially anti-competitive activity and enquiries made to us in connection with such activities to Group Legal.
- Seek guidance from Group Legal in respect of any question as to the applicability of competition and anti-trust laws.

In meetings with competitors, even when they take place in the context of committee participation or other legitimate contexts, always follow a previously agreed agenda. Discussions must never deal with:

- Issues concerning prices, discounts or refunds, costs, quantities produced and sold, supply sources, or any other element referable to the future marketing strategies.
- Issues relating to confidential profiles (economic terms, etc.) inherent to relations with resellers, suppliers or distributors.
- Information relating to the identity of clients and any other confidential information relating to clientele.
- Business, investment or advertising strategies.
- Collective actions (e.g. collective refusals to contract with a specific client and collective refusal to accept certain contractual terms are prohibited).



Tax

We are committed to being a responsible and transparent taxpayer, paying the right amount of tax in accordance with the laws and regulations of the countries in which we operate. Our approach to conducting our tax affairs and dealing with tax risk is underpinned by high standards and ethical business practice.

BSI has a zero tolerance approach for any activity relating to the criminal offence of tax evasion, and are therefore committed to fighting tax evasion and have rigorous policies and procedures in place to detect and prevent the facilitation of tax evasion offences.

BSI expects all partners and suppliers to adhere to the same high standards relating to anti-facilitation of tax evasion.

We are committed to maintaining the right processes, controls, governance, and culture across our businesses to facilitate these values and behaviours.



If you see something that's not right, speak up and raise your concern – seek advice or report it confidentially through the Compliance and Ethics Team.

Financial management and record keeping

Honest, accurate and objective recording and reporting of financial information is essential to BSI's governance, credibility, and reputation. If you are concerned that correct financial processes are not being followed or of the accuracy of financial entries, you should promptly report your concerns to your line manager, People representative or Group Legal.

We will:

- Record all transactions, expenditure, hours worked and all other aspects of BSI's business accurately, in a timely manner in accordance with our policies covering accounting, expenses and record keeping.
- Never destroy information to conceal bad practices.
- Ensure all records and supporting documentation are accurate and complete, and provide an accurate view of the business at any point in time.
- Be mindful of all expenses incurred while on BSI business; ensuring they are reasonable, comply with policies and can be justified as necessary expenditure.
- Seek approval, where required, for a gift or hospitality. Account accurately and transparently for all gifts and hospitalities, and ensure they are recorded in the relevant Gifts and Hospitality Register.
- Retain annual financial statements and documents relating to acquisitions and other significant transactions in line with BSI's Document & Information Retention Policy.
- Fully co-operate with any internal or external audits, making sure we provide the auditors with accurate information and allow them unrestricted access to documents and colleagues (subject to legal requirements).
- Never dispose of or otherwise transfer any BSI assets without proper documentation and authorisation.

If you are concerned that any correct financial processes are not being followed or of the accuracy of financial entries, you should promptly report your concerns to your line manager, People representative or Group Legal.

● Our Sustainable Practices



Sustainability

Sustainability is a key strategic focus area for BSI. It is particularly important for BSI to demonstrate integrity by leading by example and living its own purpose, mission, and values. We have made public commitments in relation to our own sustainability performance such as the goal to be net zero in our own operations by 2030. We are also a participant of the United Nations Global Compact where we need to demonstrate yearly how we align with its requirements.

Planet

We all have a responsibility to protect and enhance the environment and actively work to minimize negative environmental impacts from our operations, products, and services.

We will:

- Abide by the Group Sustainability Code.
- Positively contribute to the United Nations Sustainable Development Goals.
- Abide by the sustainable travel principles within the BSI Group Travel Policy.
- Minimise the environmental impacts associated with our operations and activities and strive for positive environmental impacts. including: Reduce carbon emissions, travel responsibly, prevent pollution, reduce waste, enhance biodiversity, reduce impacts associated with energy use, minimize the use of natural resources, and in general minimise the environmental impacts associated with our products and services.
- Comply with local and national environmental regulations.
- Play our part in delivering BSI's commitment of being net zero by 2030 and contributing to the United Nations Sustainable Development Goals.
- Undertake initiatives to promote greater environmental awareness and responsibility.
- Raise issues which we identify that could cause environmental harm.

People

We are committed to respecting and upholding human rights wherever we operate. We each have a role to play in the elimination of human rights abuses such as child labour and modern slavery, including human trafficking, forced or indentured labour.

Where practical and appropriate, we will actively work to maximize the positive social impacts of our operations, products, services and within our supply chain.

Where we identify an opportunity to do so, we will:

- Support the education of communities at all levels, in particular the education of children, women and vulnerable groups in the local community and supply chain.
- Support the development and education of our current and future workforce.
- Support local sourcing and the creation of employment opportunities.
- Invest in communities local to our sites.
- Support social investment and philanthropy Contribute to and support charities in accordance with our giving principles through sponsorships, donations, fundraising and volunteering activities (in line with our Volunteering and Charitable Donations Policies).
- Seek approval before making sponsorship commitments and charitable donations.
- Ensure that charitable donations or sponsorship do not amount to bribery.
- Review, monitor and investigate our operations for human rights abuses.



Ethical Procurement

We prioritise sustainable sourcing. We purchase services and supplies from a wide variety of suppliers, from recognised global brands to specialist local suppliers.

Where possible, we source from fair trade initiatives.

We will:

- Ensure that our suppliers have a Modern Slavery statement/policy/process where applicable and comply with it.
- Ensure our procurement activity will comply with relevant health and safety standards, codes of practice, local laws, and standards.
- Ensure our procurement activity will appropriately reflect our commitment to sustainability.
- Ensure business partners and suppliers are selected and retained through a non-discriminatory bidding and tendering process.
- Require all our suppliers to meet a robust set of performance criteria.
- Encourage and assist the adoption of best practice among all suppliers and expect all our suppliers to abide by all applicable laws and to adhere to our Code and Group Sustainability Code.
- Ensure any relationship with business partners and suppliers is conducted in accordance with the principles of responsible and ethical trading outlined in this Code and the Group Sustainability Code.
- Act within the Code of Ethical Trading Initiative, the key elements of which are:
 - Working conditions are safe and hygienic
 - Child labour is not used
 - Living wages are paid
 - Working hours are not excessive
 - No discrimination is practised
 - No harsh or inhumane treatment is allowed



● Responsible Use of Information



Intellectual Property

Proprietary information such as information contained in BSI's policies, processes, systems, and operations helps distinguish us from our competitors and maintain a competitive advantage in the marketplace.

We will:

- Never agree to assign our intellectual property rights to clients, customers or other third parties without first consulting with Group Legal.
- Not agree to share any of our intellectual property or confidential information without first making sure an approved confidentiality agreement is in place.
- Never use BSI intellectual property or confidential information for personal gain or for reasons unconnected with our role at BSI.

We are committed to respecting the intellectual property of third parties.

We will:

- Only copy documents and materials when we have specific permission and a genuine commercial need to do so.
- Not infringe a patent, trademark, or other intellectual property right of any third party.
- Not use any third party's confidential information unless we are authorised to do so, supported by a signed confidentiality agreement that meets local internal guidelines.



If you see something that's not right, speak up and raise your concern – seek advice or report it confidentially through the Compliance and Ethics Team.

Confidentiality

No employee should disclose any confidential information (or information that could reasonably be assumed to be confidential) without specific authority to do so.

We are committed to protecting the confidential information of third parties.

Examples of confidential information

Confidential information includes any sensitive or proprietary data and information in all its forms regardless of the media in which it is recorded or how it may be shared or transmitted.

It may include:

- Financial information (e.g., price sensitive information, financial records).
- Business information (business strategies, management information and accounts).
- Client information (client financial information, pricing models and proposals, tender response information, assignee lists and personal data).

We will:

- Only release confidential information under the terms of a written confidentiality agreement or under the contractual terms of an agreement with the relevant client, business partner or supplier.
- Never disclose confidential information including personal information, other than to those with a legitimate business need to access it.
- Notify Group Legal if we are requested to disclose confidential information by any competent judicial, governmental, regulatory, or supervising body.
- Not use confidential information for our own personal advantage or for a friend's or relative's benefit.
- Be familiar with our Information Security Policy and follow its guidelines in terms of security and the use of BSI IT communication systems.



Information Security

The primary goal of information security is to promote practices that ensure the confidentiality, integrity and availability of BSI's information and resources.

We all have a role to play in helping to safeguard BSI's IT systems, networks and applications and will do this by ensuring we use them appropriately and responsibly.

Examples of inappropriate use of BSI IT systems:

- Accessing systems without authorisation.
- Sharing login credentials such as passwords with other people.
- Downloading unlicensed software that could cause IT systems to be infected with malware.
- Changing or circumventing security settings without authorisation.

Managing, handling, and sharing information

We are all responsible for correctly managing and handling the information we create, use, and share on behalf of BSI and its clients, suppliers and other third parties. Document labelling is a way of describing the value and sensitivity of information.

Our Information Classification, Labelling and Handling Policy is used to indicate the sensitivity of BSI's information contained in the document. The classification level applied to information assets will determine the level of safeguards linked to storage, handling, processing exchange and destruction to protect that information.

We will:

- Protect system log-on information and keep passwords and other credentials secure.
- Lock IT equipment when leaving it unattended and lock away sensitive information when not in use.
- Be vigilant for phishing attacks such as reporting suspicious emails and being cautious about clicking on unknown links or attachments.
- Respect any restrictions on our use of BSI IT systems, networks, and applications.
- Be mindful that all activity on BSI IT systems may be subject to lawful monitoring, including any personal use and storage of information.
- Only access, work on and transmit business information on approved devices and networks.
- Manage our online presence in accordance with the expected standards of workplace behaviour and in accordance with relevant BSI policies.
- Not use BSI IT for inappropriate, abusive, offensive, humiliating, or intimidating communications.
- Not use personal email or accounts for BSI business.
- Immediately report any actual or suspected security incident such as loss of BSI IT equipment or emails sent to the wrong person.

Examples of inappropriate managing, handling, and sharing information:

- Sharing sensitive information with unauthorised individuals e.g., sending an email to the wrong recipient.
- Lowering the classification of information so it avoids detection by technical controls used to prevent data loss.
- Retaining files in personal drives rather than in shared drives thereby preventing authorised users from accessing the information.
- Clicking on unsolicited links or attachments in emails without checking their legitimacy.

Protecting BSI

- Ensure that third parties are aware of our policies and our Code.
- Ensure that any third-party requesting access to systems and/or information is authorised to do so, and that there are appropriate confidentiality agreements in place before sharing any information.
- Ensure suppliers have been properly vetted and gone through the correct procurement procedures.
- Don't share credentials – third parties, including auditors, should be given their own access, where appropriate, so their activities can be monitored in the same way as for employees.
- Challenge visitors if they aren't wearing IDs and escort them when in sensitive areas.
- Make sure only authorised business emails and systems, including those of third parties, are used to conduct BSI business.

We will:

- Apply the appropriate classification label to the information we create, that is to say: PUBLIC, INTERNAL, RESTRICTED, CONFIDENTIAL.
- Store, handle, send, share, and dispose of information in line with the handling requirements that apply to the information classification.
- Seek appropriate support if we are unsure what classification labels to apply, and question the labels on documents and emails that we think may be incorrectly marked.
- Consider who should have access to information, for what purpose and whether they require any authorisations.



Privacy and Data Protection

Privacy and Data Protection are core BSI values. We are committed to complying with all applicable data protection laws and respecting the privacy of the individuals who trust us with their personal data. We all have a responsibility to ensure we meet our data protection and privacy obligations which are set out in our Privacy Policy.

We will ensure that we are fully accountable for all personal data processed and adhere to the data protection principles.

BSI will ensure your data protection rights are respected and have identified roles and responsibilities for assisting you with exercising your rights or any data protection enquiry you may have, which are explained in our Privacy Policy and available on our website.

We will:

- Collect personal data for specified, explicit and legitimate purposes and not process it further in a manner that is incompatible with those purposes.
- Process personal data lawfully, fairly and in a transparent manner.
- Ensure personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- Ensure personal data is accurate and, where necessary, kept up to date.
- Keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data was gathered.
- Process personal data in a manner that ensures appropriate security of personal data.

We will ensure that we are fully accountable for all personal data processed and adhere to the data protection principles.

Examples of inappropriate use or handling of personal data:

- An email or attachment containing personal data being sent to an incorrect recipient.
- Documents containing personal data being left unattended and exposed to inappropriate access or misuse, or used in an unauthorised way.
- Failing to ensure that personal data contained in systems can only be accessed by employees or business partners with a legitimate operational need to see it.
- Loss or theft of a document, file or electronic device containing personal data.





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By Royal Charter



Companies House number ZC000202