

CODE OF CONDUCT

25/07/2024

QMS.SAO.PO.004.v2

Applicability

QMS **Certification** is an accredited certification body with strong values.

This Code of Conduct translates our values into actions and is applicable to the entire Organization, including employees, auditors, evaluators and other business partners (“stakeholders”).

We believe that our code is a reference so that the actions of those involved are based on our values.



Failure to respect the code of conduct and failure to comply with the precepts of our values will result in a breach of trust which will result in disciplinary actions under current laws.





Channel for Reporting and Deviations

We encourage all interested parties to raise concerns regarding our values, our code and our conduct.

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We provide a channel that ensures the confidentiality of information, preserving the identity of the people involved, through which it is possible to forward complaints about misconduct and behavior that contradict our values, our code and/or our conduct, and to resolve any doubts contained in this code .

For whistleblowers, complainants or anyone raising concerns, we strongly prohibit retaliation and will fully support your protection in all spheres.

For any concerns, please contact: **excellence@qms-certification.com**

“Ethics is aesthetics from within”

(Pierre Reverdy)

Mission

*Strengthen companies
and society through
certifications .*

ISO certification
Adding and credibility to
companies



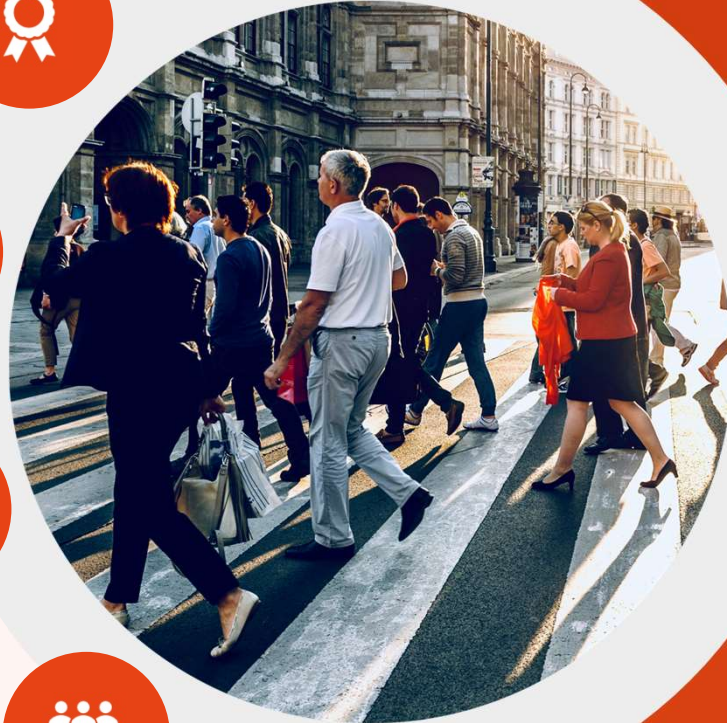
YouTube
100%-focused channel on
management systems



Content
QMS blogs, in addition to
e-books, checklists,
newsletter and webinars



Events
We take part in the main
Quality events and carry out
events for stakeholders



VISION

To be recognized for the best service in the global market

Be recognized for the best service in the global market.

Values



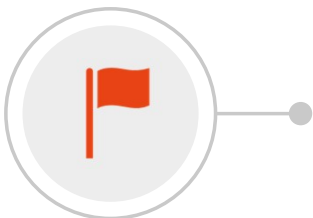
CLIENT FIRST

Excellent service and anticipation of trends and solutions



DELIVER TRUST

Certainty of confidence in results and guarantee of market recognition



GO FURTHER

Qualified and encouraged team for new training, new products and solutions



THINK GLOBAL

Global scope of operations, integrated solutions for the customer

Anti-bribery Policy

QMS Certification as an active Certification Body in certifications and training in Management Systems standards, in relation to combating corruption determines that:

- **The payment and receipt of bribes, as well as any practice that leads to the perception of corruption in the conduct of services provided, is prohibited;**
- All employees must be guided by the QMS Code of Conduct;
- QMS is committed to complying with applicable anti-corruption laws and other requirements that are applicable to the organization;
- **Any and all reported anti-corruption concerns will be investigated, dealt with and the whistleblower will not suffer any reprisal;**
- The QMS compliance function has full independence and authority;
- Failure to comply with the Anti-Bribery Policy and Code of Conduct will result in disciplinary action under current laws.



Expected conduct in the work environment

Considering the values, ethical principles and expected attitudes, **QMS Certification** is fully committed to combating corruption and unethical conduct.

All employees and interested parties must follow some guidelines:

- Comply with established laws and regulations, standards, policies, processes and procedures;
- Know and continuously practice, in your day-to-day operations, the principles, values, conduct and concepts of this Code, contributing to continuous improvement, aiming to preserve the company's brand, image and reputation;
- **Participate in all training courses considered mandatory with punctuality and dedication, putting the content into practice;**
- Promote and comply with applicable legislation, environmental, health and safety policies and procedures and ensure safe and healthy conditions and environmental protection;
- **Do not use your position, activity, position or influence to obtain favors for yourself or for third parties with direct or indirect relationships;**
- **Do not participate in, encourage or tolerate any forms of discrimination such as ethnicity, gender or political, sexual, religious, cultural and/or physical disability preferences or options. Harassment, such as sexual, economic, moral and/or situations that constitute undue pressure, intimidation and/or threats, will not be tolerated in relationships between employees, regardless of their hierarchical level;**



Expected conduct in the work environment

Considering the values, ethical principles and expected attitudes, **QMS Certification** is fully committed to combating corruption and unethical conduct.

All employees and interested parties must follow some guidelines:

- Present yourself at the work environment in a completely normal and sober state (without drunkenness, drug use, etc.);
- Wear clothing appropriate to the type of activity you carry out, considering the public you have contact with and their respective cultural and corporate habits, always with common sense and discretion, considering that they represent the company's image before customers and society.
- Ensure the accuracy and veracity of information and results in the area in which it operates or under its direct or indirect responsibility, without promoting any type of manipulation of information and results aimed at any undue advantage or overvaluation of its professional performance;
- Do not tolerate or allow the carrying out of businesses that involve the employment of slave and/or child labor, sexual exploitation and human trafficking in any process related to the company's activities and/or its value chain;
- The expected attitudes are not restricted to the examples mentioned above and must always be in accordance with ethical values and professional integrity.

Confidentiality Policy

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QMS CERTIFICATION agrees to maintain strict standards to safeguard the confidentiality of information obtained or created during the execution of certification activities at all levels of its structure, including everyone acting on its behalf. Information about any customer or person will not be disclosed to third parties without the written consent of the customer or person concerned. When QMS CERTIFICATION is required by law to disclose confidential information to a third party, the customer must be notified in advance of the information provided. QMS CERTIFICATION maintains a confidentiality policy and appropriate procedures to ensure the confidentiality of all customer information.

QMS Certification is committed to complying with all standards and laws applicable to information security and privacy. QMS Certification , including its employees, will be responsible for all damages caused by the misuse of information made available by the Customer under this Agreement, in accordance with current security and privacy legislation.

Information security

We are committed to promoting and developing practices that guarantee the information privacy and security. On the other hand, interested parties must also ensure the integrity of the data and some attitudes are expected:

- Intellectual Property information, including confidential information, agreements, contracts, projects, studies, plans, spreadsheets, technical specifications, etc. , must be protected, kept secure and confidential with limited access to interested parties who actually need to know about its content for the performance of its functions;
- Do not alter the content, reproduce or take possession of any document, information and/or data, without authorization from the competent authority;
- Do not install or reproduce programs on/from QMS Certification computers without authorization from the competent areas;
- Use electronic mail (e-mail) only for professional matters. The dissemination of messages with illegal, pornographic, immoral or discriminatory content will not be permitted under any circumstances;
- Do not pass on information to the internal or external public, especially confidential information, even to respond to requests from authorities, without the prior and express authorization of the Board;
- Do not use information from the company, its customers or partners, in external activities and publications, such as classes, lectures, conferences, academic work, among others, without first obtaining prior and formal authorization, in compliance with applicable legislation.

Commitment to Privacy and Data Protection

25/07/2024

- QMS Certification is committed to protecting the privacy and security of the personal data of our customers, employees and partners, in compliance with local and international data protection laws such as GDPR, LGPD, CCPA and PDPA.
- We guarantee all rights provided by law to data holders, including access, correction, deletion and opposition to the processing of their personal data.
- All employees must understand and practice data protection policies, ensuring appropriate use, authorized access and integrity of information.
- We implement technical and administrative measures to protect personal data against unauthorized access, alteration or destruction.
- It is mandatory that all employees participate in regular data protection training to ensure understanding and proper application of our privacy policies.

Confidentiality of Customer Information and Property

Employees must maintain confidentiality regarding information, documents, data, processes, techniques and products owned by others and other internal matters, which must be restricted to those employees involved in the execution of services, and they are prohibited from providing and/or disclosing any information owned by the customer, including that sent by the customer and/or generated for them, to any other person and/or company, competitor or not, unless there is prior and formal authorization authorizing such disclosure.

Press and Social Media

- Contacts with the press will occur exclusively through people duly authorized by Management. The interests and image of QMS Certification must be observed when granting interviews, in other similar public demonstrations and/or in the case of article publications. The information provided must be based on veracity and transparency, being passed on clearly and correctly. All employees are responsible for ensuring the image and reputation of QMS Certification . Likewise, employees must also be careful when speaking on social media:
- Never publish content, comments and/or information related to strategies, market, customers, suppliers and business partners;
- Be careful when sharing your personal opinions on social media in cases that could link your profile with a QMS Certification corporate opinion;
- If you identify a controversy and/or criticism on social media involving the company's activities, inform Management.

Conflict of Interest Policy

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- QMS Certification identifies, analyses, evaluates, treats, monitors and documents risks related to conflicts of interest arising from the provision of audits and certification, including any conflicts resulting from its relationships, on an ongoing basis.
- The Client undertakes to report to QMS Certification any potential threats to the objectivity of its audit and certification activities that it identifies in the audit team's acceptance.
- When designating the audit team and preparing the audit report, the lead auditor confirms that he and the other team members have no conflict of interest with the organization being assessed. A Conflict of Interest Waiver is signed by all QMS CERTIFICATION auditors and employees at the time of approval.

Threats to Impartiality



Self-evaluation



Familiarity



Intimidation



Self-interest

At **QMS Certification** , impartiality is at the heart of every aspect of the services we offer. We recognize and respect the importance of delivering, without compromising integrity.

QMS maintains a professional culture and environment (through formal and informal meetings and discussions) that emphasizes the expectation that staff and auditors act in the broader interest of promoting a culture of Quality within audited organizations and helping to enhance credibility of audits, certification processes and, ensuring total impartiality in its actions.

QMS identified, analyzed, documented and incorporated controls over the following possibilities of conflict of interest arising from the provision of services and their relationship:



A impartiality is not only an accreditation requirement for a Certification Body, **it is an absolute need for maintaining the Certification Process credibility.**

Impartiality Management

QMS identified, analyzed, documented and incorporated controls over the following possibilities of conflict of interest arising from the provision of certification services and their relationship:



Self-interest

Self-interest threats and their safeguards

Own financial interest

The auditor selection process, the audit process and the certification decision are carried out in a way that ensures that the certification is based on objective evidence of compliance with the relevant criteria. All certification processes are carried out under the supervision of Senior Management and have appropriate controls throughout the process.

QMS and its employees **will** not exercise undue financial conditions, practice any form of discrimination or other conditions towards the applicant or certified organization that could harm QMS's reputation .

Auditors – Self-Interest

QMS ensures, through in - depth review of auditors' CVs and their current affiliations, that they have no financial interest in the clients being audited by them. Furthermore, through signed Conflict of Interest and Confidentiality Agreements (Conflict of Interest Agreement / Confidentiality Agreement), it is mandatory for all auditors to disclose all situations of potential conflict of interest. In such situations, it is ensured that the auditor is included in the audit team or certification decision process.

QMS auditor is exercising financial or other adverse conditions in the organization being audited, appropriate disciplinary action must be taken.

Impartiality Management

QMS identified, analyzed, documented and incorporated controls over the following possibilities of conflict of interest arising from the provision of certification services and their relationship:



Self-interest

Self-interest threats and their safeguards

Our management system ensures that the decision of certification, complaint, appeal, etc. be taken by someone who has not participated in the certification, complaint, appeal, etc. process.

QMS , any employee or person acting in the certification processes on its behalf cannot offer or provide Management Systems consultancy services to a client to be certified. QMS **does not offer or provide consultancy** on Management Systems.

To ensure that there is no conflict of interest, and to ensure that there will be no threat to impartiality, personnel who provided Management System consultancy, including those acting in a managerial role, are not used by **QMS** to participate in Audits or other certification activities , if they have been involved in Management System consultancy in relation to the client in question less than two years after the end of the consultancy.

QMS **does** not outsource audits to a management system consultancy organization as this constitutes an unacceptable threat to its impartiality.

QMS activities cannot be negotiated or offered in connection with the activities of an organization that provides Management System consultancy. QMS must take action to correct inappropriate statements or associations by any consulting organization that claims or implies that certification would be simpler, easier, faster, or less expensive if QMS **were used** .

QMS cannot certify another Certification Body for its Quality Management System

Impartiality Management

QMS identified, analyzed, documented and incorporated controls over the following possibilities of conflict of interest arising from the provision of certification services and their relationship:



Familiarity



Intimidation

Threats to impartiality

Familiarity (or trust) threats

If **QMS** determines that one of its auditors has unacceptable familiarity with a client, **QMS will** change auditors (for at least one audit) upon completion of a certification cycle to eliminate or reduce the familiarity threat that may arise due to long-term, ongoing professional relationship (by virtue of carrying out audits) with an audited company.

If the familiar relationship is characterized, the auditor involved will not participate in the audit team or in the certification decision-making process of the related organization.

Intimidation threats

QMS auditors are encouraged to raise this specific issue in the audit report, asking the auditee to make a complaint and/or appeal to **QMS** against any evidence found that does not agree.

Likewise, **QMS** will not be coerced by any audited company or other interested parties for fear of being replaced when carrying out certification activities. **QMS is** committed and determined to carry out its certification activities without any fear of litigation, substitution, etc. However, auditees are informed of the appeals process if they are not satisfied with decisions made by **QMS**.

Impartiality Management

QMS identified, analyzed, documented and incorporated controls over the following possibilities of conflict of interest arising from the provision of certification services and their relationship:



Familiarity



Self-interest

Threats to impartiality

Competition threats

QMS ensures that **auditors** are selected after evaluating the chances of conflict to eliminate or minimize any competitive threat between auditors and auditee.

Conflict of interest arising from relationship

QMS **has** determined potential areas of conflict of interest due to any relationship based on ownership, governance, management, personnel, shared resources, finances, contracts, marketing or other incentive for new client entry that may threaten the impartiality of its QMS activities. certification.

Unethical behaviors or behaviors that may generate conflicts of interest are not tolerated

- Change the content of any document, information and/or data, without authorization from the competent authority;
- Use internal information from the company, clients or third parties, whether confidential or not, for direct or indirect benefit, either for oneself or for third parties;
- Unduly or illicitly influence and/or interfere in the results of bidding or competition in which the company is participating;
- Promising, offering or delivering any type of goods or items of value to any interested party (including public agents, private companies and individuals), who has direct and/or indirect authority over pending transactions, contracts and/or regulatory decisions related to QMS business.
- Make donations, including philanthropic donations and sponsorships of any kind, without approval from Management, or which are used to hide some type of illicit act, or any transaction that could be interpreted as an undue advantage, for any agent or person, whether natural or legal ;

Unethical behaviors or behaviors that may generate conflicts of interest are not tolerated

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- Request gifts or other advantages of any nature from customers/third parties who are interested in doing business with QMS. Promotional gifts may be accepted as long as they are unsolicited, do not exceed customary and acceptable courtesy, and are not monetary in nature.
- Any activities that do not align with corporate values or that may harm the company's reputation are not permitted.

These examples do not represent an exhaustive list. Other conduct, which is not specifically mentioned, but which violates our ethical principles or applicable legislation, may also be considered unethical and may be subject to disciplinary measures. All employees are encouraged to act with discernment and responsibility, always aligned with our values and ethical policies.

Controls



CUSTOMERS
Legal agreements



AUDITORS AND EVALUATORS
Training and contracts



STAFF
Training and contracts



OTHER STAKEHOLDERS
Committees and channels



TECHNOLOGY
Global ERP
IAF CertSearch



DIVERSIFICATION
Clients, auditors and evaluators






INTERNAL PROCESS
Approvals and releases



WITNESSES AND OBSERVERS
Internal and external



CERTIFICATION

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