

## Nemko Group Global Code of Conduct



v.3 February 2024





## Nemko Group Global Code of Conduct

Dear Nemko colleagues

Nemko shall work for safety, sustainability and the environment through a sound and profitable business. For this purpose, Nemko has a global presence and we provide our services in many different countries.

Regardless of where we are, our conduct of business shall be law-abiding and sustainable. Our services shall be robust, and be performed in a professional and timely manner, in accordance with the applicable contract and our management system. This Code of Conduct is meant to maintain a common set of expectations to each and every individual and team; – A common denominator in our efforts to maintain and develop a sound and profitable business.

There are eight main elements in our Code of Conduct. They represent an integral part of who we are and who we want to be. They represent part of the core of our independent third party services and the basis for the trust that our customers and society have placed in us for nearly 100 years:


1. We shall make documented risk assessments for our activities that take into account the elements below;
2. We maintain impartiality and independence in our conformity assessments;
3. We safeguard the confidentiality of Nemko's and our customers' information;
4. We understand and abide by local law in the countries where we operate;
5. We act in an ethical manner and do not engage in corruption in any of its forms;
6. We care for the environment and sustainability in all we do;
7. We care for our colleagues and maintain their trust; and
8. We encourage reporting of breaches of this Code of Conduct.

These elements are addressed more below. They apply for all in Nemko, at all levels, but also for those who work for us or with us without being employed, and for the board of directors in the various legal entities in the Group.

We hope that you will take the time to read the Code of Conduct and that it will be relevant for you when needed.

Lysaker, Norway, 29<sup>th</sup> February 2024

  
Per Ove Øyberg  
CEO Nemko Group

  
Kristian Syverstad Myrbakk  
Nemko Group General Counsel





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### **1. Documented risk assessments**

Nemko shall manage risks arising in connection with our daily operations, major decisions and projects at global or local level in accordance with the principles set out in ISO 31000. The elements listed below in 2–8 shall be included in the risk assessments.

### **2. We maintain impartiality and independence in our conformity assessments**

Every one of us shall take the time to acknowledge that together we contribute to Nemko's role as an independent third party conformity assessment body.

A basic expectation to this role is that each of us shall not let – or be perceived to let – our professional judgment or the execution of work be unduly influenced by other interests, concerns, pressures or familiarities than those that are relevant under the schemes concerned. There will and shall always be room for individual professional discretion in our performance of work – and this authority must be used in an informed and professional manner, within the direction of the applicable scheme.

This means that we shall always apply our intellectual ingenuity, our commercial understanding and our combined domain and regulatory knowledges to accommodate customer needs for professional conformity assessment services delivered on time in accordance with contract specifications.

We shall document what we do in a manner which at a later stage allows us to demonstrate that we have actually performed our work in accordance with the applicable requirements.

It can from time to time be challenging to apply these principles in a highly competitive market. Add to this that we often develop strong personal and professional value-adding relationships with individual customers and their representatives (familiarity threat), and that other customers do not understand our role. However, we shall never jeopardize our trust by compromising on integrity or quality.

### **3. We safeguard the confidentiality of Nemko's and customers' information**

Most industries benefit from an unprecedented capability to monitor, collect, aggregate and store information and data. Correspondingly, there is a general focus on safeguarding the confidentiality of information, data and business secrets. This is also reflected in our accreditations.

Everyone working for us shall contribute to safeguarding the confidentiality of both our own and customers' information, data and business secret, and shall access information only on a need-to-know basis or for internal training purposes. Access to customer information shall as a starting





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point only be given to customer itself. This applies also after termination of the work relationship with Nemko.

### **4. We understand and abide by local law in the countries where we operate**

Local laws and regulations must be complied with. That applies for instance for tax, license, authorization and reporting purposes. If Nemko has decided to establish and maintain operations in a specific country, we have also accepted that local law applies. Breaches of law can have significant negative effects for our operations, customers, reputation and personnel.

To the extent the Code of Conduct or the Nemko management system set out principles that are stricter than the local law, the strictest set of requirements shall apply.

### **5. We act in an ethical manner and do not engage in corruption in any of its forms**

We do what is right and act in an ethical manner in our conduct of business and provision of services.

Corruption represents a threat against fair trade, development, democracy and a well-functioning civil society. Corruption also represents a risk from reputational, commercial and criminal law perspective for Nemko, and a risk for our colleagues and their families.

Nemko shall through its management system and trainings create awareness and trust among our board, colleagues and other personnel working for us to reduce the risk of bribery at all levels in the organization, whether actively as the party proposing or as the party accepting.

In particular, and unless anchored in our gifts and hospitality guidelines, we shall not:

1. Make payments or provide gifts or hospitalities to a company or an individual to obtain benefits for Nemko or colleagues without us being legally entitled to these benefits (bribery). Neither shall we accept similar gifts or favors to Nemko or our colleagues from customers or others.
2. Make payments or provide gifts or hospitalities to friends, family, relatives and others in the environment of a decision-maker to influence the decision-maker to obtain decisions or business that we might not otherwise have obtained (trading in influence).
3. Pay or receive so-called facilitation money. These are payments that are typically requested by public officials who control some kind of bottleneck for a person's legitimate access to goods and services. The bottlenecks may typically be related to physical access to customer facilities, issuance of a work permit, a building permit or a business license, transit at airports, issuance of certificates or test reports or access to a customer product at a delivery point.







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Adequate due diligence shall be demonstrated in the selection and contracting of subcontractors and partners, in particular for agents and other middlemen used in the provision of our services.

### **6. We care for the environment and sustainability in all we do**

Nemko shall implement sustainable practices and reporting at all levels of the organization, both globally and locally, in its conduct of business and provision of services as well as in its management of suppliers.

All who work for Nemko shall undergo regular trainings in how social, environmental and governance issues affect the industry and the circle of customers as well as Nemko, its operations and services, and vice versa.

### **7. We care for our colleagues and maintain their trust**

Nemko and all who work for us have a responsibility to protect and work for the safety, health and well-being of our colleagues worldwide. We shall establish a safe and healthy work environment for everyone, based on sound leadership principles, and implement systems and training which safeguard this.

All in Nemko shall be treated fairly and with respect, enjoy a work-environment free from verbal or physical harassment, and a principle of equal treatment in accordance with objective criteria shall be applied from employer perspective. Nemko does not discriminate based on race, colour, gender og political or religious belief.

Use of Nemko's assets or facilities for personal purposes is not allowed unless pre-approved by the General Manager or otherwise following from the context.

We all have the responsibility to maintain that trust and apply the elements of the Code of Conduct in our day-to-day activities, in good times and in bad times. In order for all of us to live up to these expectations, it is important that we can trust the Nemko leadership, and that you are enabled to follow the Code of Conduct. All those who work for us shall:

- have access to the training and qualifications necessary to provide the services in a professional manner and to comply with this Code of Conduct;
- be allowed to exercise their professional judgment in the execution of conformity assessments in an independent and impartial manner without undue interference from superiors;





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- get the necessary support from the organization in case of pressure to make decisions or take actions which are contrary to this Code of Conduct or which otherwise jeopardize the impartial and professional execution of Nemko's role as independent third party; and finally
- be able to address challenges or concerns regarding our conduct of business or provision of services by using the internal channels dedicated to this, with confidence that they will be handled professionally and without fear of retaliation. All in Nemko have the right to express their views and concerns in good faith, using the channels and reporting lines available.

### **8. We encourage reporting of breaches of the Code of Conduct**

Doing the right thing is not always easy.

In some cases the Code of Conduct, our trainings and Nemko's management systems might not provide the necessary guidance and you are in doubt regarding what to do in a particular situation. In such case, all in Nemko shall support one another.

Please seek advice or report misconduct as close to your place in the organization as possible. There must be good reasons not to follow the line of reporting.

This means your primary contact point for support and reporting of misconduct is your line manager.

If the line manager is not available or there are other legitimate grounds to bypass the line manager, you can also contact the General Manager in your country or the Nemko General Counsel. More guidance is given in the Nemko Integrity Policy. There should be substantiated good grounds not to contact the line manager or the General Manager, and instead contact the Nemko General Counsel directly.

In some local units there are dedicated reporting tools available.

