



## Nemko Group 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. These general expectations to our conduct of business and provision of services, are formulated in various governing documents. Together they form our global management system, the Nemko Group Quality Assurance (NGQA). The Nemko Group Code of Conduct supplements the NGQA. The Code 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 seven main elements in our Code of Conduct. They represent an integral part of who we are, and who we want to be. They are 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 maintain impartiality, and independence in our conformity assessments;
2. We safeguard the confidentiality of Nemko's and our customers' information;
3. We understand and abide by local law in the countries where we operate;
4. We act in an ethical manner and do not engage in corruption in any of its forms;
5. We care for the environment and sustainability in all we do;
6. We care for our colleagues and maintain their trust; and
7. We encourage reporting of breaches of this Code of Conduct.


These elements are addressed more in items 1–7 below. They apply for our directors, officers and employees at all levels, and 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 have established a reporting procedure which allows you to request support and report misconduct directly to the Group General Counsel. Do not hesitate to establish contact when necessary.

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, June 2021

  
Per Ove Øyberg  
CEO Nemko Group

  
Kristian Syverstad Myrbakk  
Nemko Group General Counsel

**1. 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 a competent 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.

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 the contract specifications.

We shall document what we do in a manner which at 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 act in accordance with this 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.





## **2. 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 in the market 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 our customers' information, data and business secrets, and shall access information only on a professional need-to-know basis or for internal training purposes. Access to customer information shall as a starting point only be given to the customer itself. This applies also after the employment, subcontracting or supplier relationship have been terminated.

Nemko will not tolerate that employees, subcontractors or partners disclose information about Nemko or its customers to third parties without a written order from the customer or basis in law or in NGQA.

## **3. 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 we have 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 management system set out principles that are stricter than the local law, the strictest set of requirements shall apply.

## **4. 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 personnel and their families.

Nemko shall through this Code of Conduct, NGQA, local gifts and hospitality guidelines and trainings create awareness and trust among our board, directors, employees, subcontractors, and partners to reduce the risk of corruption at all levels in the organization, whether actively as the party proposing, or as the party accepting.



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

1. Make payments or provide gifts or favors to a company or an individual to obtain benefits for Nemko or our employees without us being legally entitled to these benefits (bribery). Neither shall we accept similar gifts or favors to Nemko or our employees from customers or others.
2. Make payments or provide gifts or favors 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 smaller 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 or access to a customer product at the post office.

Adequate due diligence shall be applied in the selection and contracting of subcontractors and partners.

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

We address environmental concerns and sustainability in our organization, in our communication with customers, and in our decisions working for Nemko. At all levels in our organization, in our business development, conduct of business, - provision of services and in our strategic and tactical decisions, this shall be our guiding principle.

### **6. 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 employees shall be treated fairly and with respect, 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, or 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.



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We all have the responsibility to maintain that trust and to 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 everyone is 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;
- 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 our 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 employees have the right to express their views and concerns in good faith, using the channels and reporting lines available.

### **7. 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 and NGQA might not provide the necessary guidance, and you may be in doubt regarding what to do in a particular situation. In such case, we 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 reasons to bypass the line manager, you can also contact the General Manager in your country, or the Nemko General Counsel. More guidance for employees regarding these processes are given in the Integrity Policy included in NGQA. There should be substantiated good grounds not to contact the line manager or the general manager, and instead contact the General Counsel directly.