

**PRINTA**

**CODE OF ETHICS  
AND CONDUCT**



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## PROLOGUE

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Matías Romero  
CEO

ACERTA's ambition is to be a global organization, well recognized for the high reliability of its assessments, reports and certificates".

This reputation should be based on the continued respect of the values of independence, competence, objectivity and confidentiality that

must rule our profession.

This CODE describes the values, principles and rules to be met by ACERTA's individuals, which are the engine of our

consistent growth, and the basis of the trust relationship with our customers, partners, employees and other stakeholders.

I really wish that the respect that we deserve from the market, thanks to the strict compliance with these values, made us feeling proud to work in this organization.

Hence, I encourage you to do your best effort to comply continuously with such values, and to help me ensuring that everyone complies with them.

### 1. INTRODUCTION

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ACERTA's **mission** is **adding confidence** on the products, the processes, the services, the projects and the organizations that we assess. Hence, our reports and certificates must show clearly, precisely and in the most exhaustively possible manner our conclusions on the assessed items, as well as the motivations leading us to such conclusions.

Our work makes sense if we are able that such confidence increase is really well appreciated by the different actors in each sector, so that everyone can be sure that products, processes, services and projects assessed by ACERTA meet the applicable requirements.

We conduct a technical job, well regulated, and based on standards and procedures, in an intense personal and group training. But in the other side we must be aware that our participation in each case is brief. Afterward only a report remains from our side, but from the client's side it also remains an impression of the professionalism of our representatives and of ACERTA's organization.

Thus our working methods, our expertise and our individual and group talent are eventually synthesized

into a mere **impression of reliability** that is what fundamentally determines the continuity of our business.

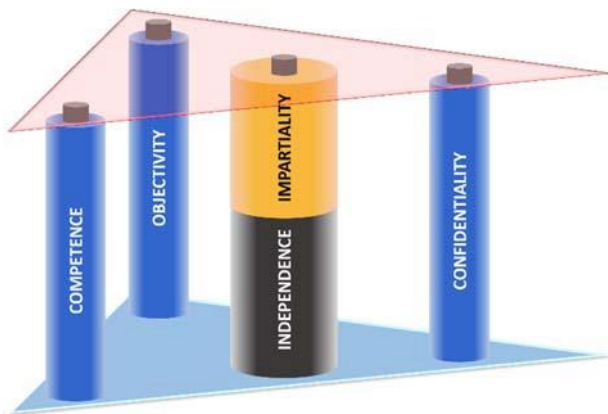
We feel proud that customers consider us among the most reliable certification bodies over the world, especially those who act through strict quality policies, as well as that the promoters of standards rate us with the best level. But we mustn't relax: We currently have this ability to do properly the job, but such capacity may be compromised as the organization grows in number of people, number of customers and number of geographic locations.

The viability of the company and its stability upon the time is based on **integrity** of each and every one of the individuals working in ACERTA.

The talent of our people are the main asset of our organization; we have the best "machines" at the service of an activity with a very high dose of responsibility.

Our efforts to do correctly the job can become compromised by the interests of other persons or organizations whose objectives may be eventually not aligned with our values and with the good practice of the responsible business. So we must react quickly and effectively as soon as we detect any circumstance that may jeopardize our integrity.

ACERTA wants to be **leader in reliability**. To achieve that, all members must base their daily activities on the four core values that support the integrity crystal upon which the reliability of persons and organizations is supported: Without integrity, reliability cannot exist.



a) **Independence + Impartiality:** Is the main pillar of the integrity. If it is not enough rigid or fails, integrity crystal may crack at any moment.

**All persons involved in assessment activities or in decision-making on behalf of ACERTA must be absolutely independent from the assessed organizations.** To be independent means that there

is no moral commitment or any other motivation that may affect, positively or negatively, the objective result of the job.

Independence and impartiality of people can be affected by professional, familiar or friendship relationships, as well as by legitimate (and also illegitimate) economic interests.

ACERTA should prevent that people involved in evaluation processes and decisions are conditioned by anything likely to compromise his absolute impartiality, and the most important factor in this

regard is Independence: Impartiality is mainly based on independence. Even more, objectivity is seriously compromised if impartiality doesn't exist.

As a company willing to do business and to have a final profit, we are aware that the direct economic relationship with our customers is in most cases an issue that may affects our independence.

It may seem a contradiction that our role is to assess those who hire us and pay us for so. Indeed this is a difficult aspect to understand by those who observe our role from outside.

However ACERTA's attitude is very clear on this issue:

- ACERTA's customers deserve our respect and the most diligent treatment. However:
- In no case ACERTA's decisions should be conditioned by the economic relationship with customers: **the long-term viability of the company is infinitely more important than the benefit of any job.**
- To avoid or minimize the harmful effect of the economic relationship with customers, as a rule, ACERTA doesn't issue reports or certificates until the fees are paid by the customers.
- As a rule, we don't carry out new jobs for clients who haven't paid the fees of previous jobs.
- Exceptions to the above rules must be approved by persons with sufficient capacity in the organization and, in any case, should be reported to the managing director.
- All these rules are exposed in the contracts signed with the customers. ACERTA reserves the right to cancel the contracts when customer fails to meet its financial obligations.

b) **Competence:** Persons involved in assessment processes must have a **exhaustive and deep knowledge of the standards, of the manufacturing sectors in which they operate as assessors and of the products, processes, services or systems evaluated.** The competence is acquired through continuous studying and training. ACERTA must invest enough resources

so that the entire team has access to appropriate education, and in compensation, each person is required to achieve the expected level of competence.

- c) **Objectivity.** In ACERTA's activity context, objectivity is **the ability to judge with fairness in accordance with correctly adopted criteria.** Thus, incidents or similar situations should be assessed uniformly. Our entire team should take common criteria to work with maximum objectivity. Hence we must devote resources to define and improve our evaluation systems, to strengthen internal communications and check that people involved in assessment processes and decisions use the common criteria and do apply them in their work.
- d) **Confidentiality.** In ACERTA's activity context, confidentiality is the **capacity to avoid that the**

**information obtained in conducting assessment activities, may reach any person on who isn't involved in such evaluation.**

The confidential treatment of information is ruled in the contracts signed with clients. ACERTA's members must do their best efforts to preserve the information obtained directly or indirectly while conducting evaluation activities.

- e) This Code of Ethics and Conduct is implemented to provide all members of ACERTA the guidelines to be met personally regarding their individual behavior as well as to help to make complying these rules by the rest of the organization's members. This document must be known, read and understood by all ACERTA's members.

## 2. PARTIES AFFECTED BY THIS CODE

Integrity rules described in this document are applicable to:

- All persons from ACERTA's staff and management, whatever it was their contract.
- All ACERTA's freelancers and collaborators, with or without exclusivity.
- All persons from the staff and managers of organizations representing ACERTA.

## 3. RESPONSIBILITIES

### 3.1 Development and maintenance of the document and its requirements

This Code of Ethics and Conduct is drafted and approved by the Managing director, which is also responsible for its maintenance, and to update it when necessary.

### 3.2 Information on integrity breaches

Everybody can report on integrity breaches. ACERTA members are obliged to report timely and diligently about situations that may be a breach of this Code. The procedure is as follows:

- The person that identifies an individual or collective action that might lead to a breach of the Code of Ethics and Conduct of ACERTA, can file a complaint in writing addressed to the Managing director. The information may be submitted by email, fax, post or using the form available on the website.

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- In the case of a potential infringement involving the Managing director, the information may be submitted by certified mail to the Chairman of the Impartiality Committee of ACERTA:

Presidente del Comité de Imparcialidad de ACERTA  
Calle Aracena nº 15 – 28023 Madrid (Spain)

#### **4. PERSONAL PROTECTION CLAUSE**

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The Managing Director of ACERTA expressly declares that no person will be sanctioned nor negatively discriminated, because he complies with the rules from this Code, or helps to apply

them, or reports about a breach of the Code, except if such information is not true and is used in a malicious purpose.

#### **5. RELIABILITY OF THE INFORMATION ON INTEGRITY COMPLAINTS**

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Everybody in ACERTA must commit to report in a reliable manner when detecting any finding with regard to a breach of this Code. The information must be reported in writing. It is important that the circumstances are accurately described, so that anyone apart from out the affair, could value its relevance.

The description and evidences of the incidence must be as exhaustive as possible. For example, but not limited to it: identification of the person who detected the incidence, people directly or indirectly involved, if happened once or is reiterative, how long it took, etc.

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## **6. CONFIDENTIALITY OF THE INFORMATION**

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All information obtained while conducting evaluations, whatever it is the origin or the support in which is saved, is confidential and may only be used by people of ACERTA for purposes relating to his activities within the organization. Exceptions can only arise when:

- a. The information has previously been published by the owner
- b. The owner authorizes in writing for disclosing it to third parties.
- c. The information is requested in writing by the competent public administration or by legal courts.

All ACERTA's employees and collaborators must sign and adhere to a confidentiality agreement that will remain in force indefinitely, even after the termination of their relationship with the organization.

ACERTA's employees and collaborators should take steps to protect the confidentiality of the information that they access while complying personally this commitment and will make their best effort to ensure that it is respected by others under their responsibility.

We all must ensure the protection of confidentiality of information, adopting locally appropriate security measures, avoiding the access to unauthorized persons, creating safe areas and hardware. In case of doubt, everyone should look for advice from the appropriate manager or the Directorate General of ACERTA.

All ACERTA's members must know that confidentiality breaches are a significant violation of the Code, so ACERTA may act legally in order to protect its own interest.

## **7. CONFLICTS OF INTEREST**

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A conflict of interest arises when someone's interests oppose ACERTA's values and principles that preserve its impartiality.

All ACERTA's employees and collaborators are obliged to declare any circumstance that may cause a conflict of interest with regard their participation in assessment activities carried out in behalf of ACERTA.

Conflicts of interest can arise for many causes. Some circumstances that should be avoided are explained later, but generally speaking and when having any doubt, members of ACERTA should be proactive and consult with their principals or the Directorate General of the organization.

In addition to this obligation, which concerns all people ACERTA, the persons responsible for assigning the jobs must take special care in avoiding any situation that may jeopardize the integrity of the organization. Thus, persons who incur in any of the following circumstances are not allowed to participate in the corresponding projects:

1. Having family relationship or close friendship with partners, managers or other persons who control or manage the organizations evaluated by ACERTA.

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2. Having family relationship or close friendship with partners, directors or other persons controlling competitors of the organizations evaluated by ACERTA.
  3. Have conducted consultancy activities (this concept is included in in-house training and internal audits) within the last two years to the organization whose products, processes, projects, services or systems are evaluated by ACERTA.
  4. Has a positive interest in the result of the assessment. For example that may occur when the assessor:
    - a. Participates or has participated in the design, implementation, development, marketing or maintenance of the products, processes, projects, services or systems are evaluated by ACERTA.
    - b. Has a family or close relationship with a supplier of the organization assessed by ACERTA.
  5. Has a positive interest in the result of the assessment. For example that may occur when the assessor:
    - a. Participates in the ownership of organizations competing with those assessed by ACERTA.
    - b. Has a family or close relationship with a supplier of the organization competing with those assessed by ACERTA.
  6. In the recent past (i.e. five years) has been involved in other situations that may condition his impartiality, such as:
    - a. Has been refused as an auditor, even if he worked for another CB.
    - b. That a job application has been refused (in relation with him, his familiars and close friends)
    - c. That has been involved in blackmail or bribery attempts (in relation with him, his familiars and close friends)

Note: At ACERTA's discretion, [open training activities](#) (called massively and imparted to anyone interested regardless of their origin), not addressed to specific sectors and not focused on solving specific problems regarding the compliance with the assessed standards, does not violate the integrity rules established in ISO 17065.

ACERTA doesn't allow your staff and partners work for other competing companies unless there is prior consent in writing. It is the responsibility of people to declare any relationship they may have with other inspection or certification bodies.

In the same manner, ACERTA's members must declare any family relationship with people working for other entities competing with ACERTA.

Noncompliance with these obligations shall be considered a serious breach regarding the rules and principles from this Code.

## **8. INTEGRITY OF THE SERVICES PROVIDED**

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We must avoid situations where our integrity may be compromised or questioned. ACERTA people should deal with these situations in an open and transparent manner, informing

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their respective directors or senior management.

We must also provide our services in a professional manner, rejecting pressings seeking to deviate us from our procedures and methods of work, much less to alter the final outcome of our evaluations. Our reports and certificates should be a true reflection of the conclusions we reached in each case.

#### **9. INTEGRITY OF DOCUMENTS AND DISCLOSED INFORMATION**

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Each person in ACERTA is responsible for the information that he provides, as well of the documents that he produces or approves, and they are obliged to ensure that the information is reliable: clear, complete and truthful.

#### **10. BRIBERY AND EXTORTION ATTEMPTS**

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ACERTA must reject any action by third parties, especially from customers, that may jeopardize its integrity as an organization. This includes, among others:

Sponsorship of projects.

Cooperative Advertising.

Financial or in-kind donations.

Gifts or gifts made with the intention of influencing the assessment. Shall not be considered as such courtesy presents usual in each territory or culture.

ACERTA representatives may have to face situations like extortion or bribery attempts that endanger their physical or professional integrity.

In case of blackmail attempt, mainly if the physical safety of ACERTA's representative is in risk, the situation must be managed in such a way that the hazard is minimized and is always under control. ACERTA shall take appropriate action once its representative is completely safe.

In case of bribery attempt which compromise their professional integrity, ACERTA's representatives must reject concessions from customers and bring the situation to the attention of the top management, which will assess the severity of the case and shall decide appropriate actions.

#### **Presents and courtesy attentions.**

Only in the situations described below, ACERTA's representatives can accept gifts (or courtesy details, but never economic amounts) from companies that are assessed.

- a. If the gift is part of the normal rules of courtesy in the country or region where the evaluated organization is placed.
- b. If the gift is not associated with an attempt to relax the assessor's criteria or to vary the final result of the assessment. In no case the assessor can accept gifts of courtesy before finalizing the evaluation work.
- c. If the economic value of the presents is not significant compared to the price



of the services conducted by ACERTA. As a guideline, a limit of 1% of such amount is established for accepting complimentary gifts.

d. In the case of gifts which may require special shipment, they can never be forwarded to the particular address of ACERTA's representative. Preferably this kind of presents will be rejected, but if it's a courtesy issue, they must be shipped to the ACERTA's office to which the assessor is linked to.

Apart from the above premises, ACERTA's representatives should reject presents from customers. Otherwise they will incur in a significant breach of ACERTA's integrity policy.

In case of doubt please do not hesitate to contact your regional manager or even with top management of the organization.

#### **11. RELATIONSHIP WITH CONSULTANTS**

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ACERTA does not provide accredited evaluation services to organizations that have been advised externally (including internal audits and in-house training) if the relationship with the consulting organization represents an unacceptable threat to ACERTA's impartiality.

It is therefore very important to know what person or organization have provided consulting services to organizations seeking assessment services from ACERTA. This information should be obtained even before making an offer. In any case this issue must be checked during the assessment process.

If an ACERTA's assessor verifies that an applicant for assessment services has been advised by persons or organizations closely related to ACERTA, should bring the matter to the attention of ACERTA's top management.

#### **12. CONTACT AND DOUBTS RESOLUTION**

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In case of doubts about the rules stated in this Code of Conduct, you may contact the Quality Manager or the Managing Director:

Quality Manager: Juan Vázquez: [j.vazquez@acerta-cert.com](mailto:j.vazquez@acerta-cert.com)  
Tel.: +34 91 740 2660

Managing Director: Matías Romero: [m.romero@acerta-cert.com](mailto:m.romero@acerta-cert.com)  
Tel.: +34 91 740 2660

Madrid, 1st of April, 20

  
Fdo. **Matías Romero Olmedo**  
\* Managing Director

**VIOLATIONS OF THE CODE OF ETHICS AND CONDUCT**  
(Fill in by hand)

Name:

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Phone / Mobile

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E-mail:

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**DECLARES**

That in his opinion a breach of the rules of the Code of Ethics and Conduct  
ACERTA may have occurred, according to information given hereinafter:

**Description of the potential infringement** (if you need more space, attach another  
sheet)

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**Names of people who have detected the potential violation:**

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In ..... at .....  
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Signature: .....

Name: .....

*Handwritten in block capitals*