

ETHICS AND COMPLIANCE

# Business Partner Code of Conduct

LRQA





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## Message from our CEO

“ At LRQA, our strategy is to be the leading global assurance partner, helping our clients navigate the rapidly changing risk landscape. We combine our sector-specific experience and expertise, with cutting-edge industry insight, to help clients mitigate the risks facing their business – today, tomorrow and beyond.

”

At LRQA doing the right thing is the foundation of everything. As we help our clients navigate a new era of risk, it is essential that we lead by example in how we conduct ourselves and how we do business.

Working hand in hand with our clients, we solve some of the hardest challenges the world faces. From verifying food safety through to ensuring that supply chains are free from forced labour, our teams are committed every day to helping clients. We can only do that if we behave with the utmost integrity.

Internally we are guided by our Code of Ethics which all of our colleagues are expected to follow. It gives us all a common understanding of what ‘doing the right thing’ means at LRQA. Structured around our Values of Vision, Integrity, Togetherness, Ambition and Expertise, it frames our actions and conversations with each other, our clients and all of our stakeholders every day.

Our commitment to doing the right thing doesn’t stop with us, it also extends to the companies we work with – our suppliers and business partners.

We have zero tolerance towards improper business practices for all who work in our company, and with us, and so we need all of our external partners to read, understand and follow our Business Partner Code of Conduct.

**Thank you for working with us and supporting us to achieve our purpose of Shaping a Better Future Together, and doing so in the right way.**

**Ian Spaulding**  
Chief Executive Officer  
LRQA

# Vision

## Your guide to this Business Partner Code of Conduct

### Purpose and scope

LRQA requires our employees, directors and officers and those working on our behalf, to comply with all laws and to act ethically and with integrity at all times.

This Business Partner Code of Conduct, which is aligned with our Code of Ethics, should guide the way our Business Partners play an active role in helping us achieve our purpose and strategic priorities.

This Business Partner Code of Conduct applies to all third parties affiliated to the LRQA Group, being companies or individuals such as sub-contractors, service providers, suppliers, agents, intermediaries, joint venture partners and franchisees (our **'Business Partners'**).

### Our expectations

LRQA only engages Business Partners who understand and share our commitment to acting ethically and in line with the principles set out in this Code.

This means you will:

- comply with this Code and any other terms that LRQA may require or provide evidence that you have equivalent policies in place.
- communicate the content of this Code to your employees engaged in activities for LRQA.
- cascade the principles in this Code to your own suppliers and sub-contractors engaged in activities connected to LRQA.
- carry out self-assessments against this Code to understand and close any gaps in your own policies and procedures.
- support LRQA with its activities to monitor compliance with this Code, including responding to questionnaires, providing documentation which demonstrates compliance and participating in Business Partner audits (as required).
- speak up if you suspect something isn't right in connection with LRQA activities

### Raising a concern

We encourage our people to raise ethical concerns without fear of retaliation and we expect our Business Partners to do the same. Retaliation against anyone who raises a concern or participates in an investigation will not be tolerated.

Business Partners can raise questions or concerns by speaking with your LRQA contacts. Alternatively, if you feel unable to raise an ethical concern directly, you can use LRQA SpeakUp.

LRQA SpeakUp is operated by People InTouch, an independent company, and allows anyone to raise concerns confidentially, and anonymously if they wish, at any time in multiple languages.

We encourage Business Partners to provide a similar anonymous service for its employees to raise ethical concerns.

[Find out more about LRQA SpeakUp](#)



## Compliance and consequences

Business Partners must comply with all aspects of this Code, as required in our terms and conditions. Business Partners are required to disseminate these expectations throughout their own supply chain and incorporate the principles set out in this document as part of routine ethical business practices. This Code contains general requirements applicable to all Business Partners. In the event of a conflict between:

- this Code and any local laws, the local laws apply. Where this Code imposes a higher standard or a more onerous requirement than local laws, then the requirement in this Code applies.
- this Code and specific provisions in your contract with LRQA, you must comply with whichever provision imposes a higher standard or a more onerous requirement.

LRQA reserves the right to audit against compliance to this Code. Business Partners are expected to maintain documentation that demonstrates compliance with this Code and provide access to LRQA on request. LRQA may also request access to business partner sites for audit purposes.

LRQA takes breaches of this Code seriously and we reserve the right to terminate contracts in the event of a material breach of the principles set out in this Code.

# Integrity

## Impartiality

Integrity is at the very core of everything we do at LRQA. We avoid situations in which our professionalism, independence or impartiality may be compromised, or could be perceived as being compromised. Our services are performed honestly and transparently.

### For our Business Partners, this means you must:

- act fairly, honestly, transparently and with integrity when carrying out activities for LRQA.
- uphold the laws and regulations of the respective countries we operate in.
- never carry out services for LRQA in a way which risks LRQA's ethical standards.
- carry out your services in line with our standards (if applicable).
- never carry out accredited services on your own solutions.

## Conflicts of interest

LRQA avoids situations where conflicts of interest could be seen as influencing our decisions or actions, to make sure our business activities are carried out independently and impartially. If we identify an actual or potential conflict of interest, we are open and transparent about the circumstances and take steps to remove, mitigate or resolve the conflict.

### For our Business Partners, this means you must:

- conduct your activities for LRQA free from conflicts of interest. If you identify an actual or potential conflict of interest, you must be open and transparent about the circumstances with LRQA and you agree to take steps to remove, mitigate or resolve the conflict.
- disclose to LRQA any relationship with any LRQA director, officer, employee, contractor or agency worker, or any other person or entity working with LRQA that represents or might appear to represent a conflict of interest.

## Anti-bribery and corruption

LRQA does not tolerate or engage in bribery or corruption in any form anywhere in the world. We demand the same zero-tolerance commitment from those we work with.

### For our Business Partners, this means you must:

- conduct your business honestly, fairly and free from any bribery or corruption.
- prohibit illegal or unethical behaviour.
- not offer, give, request, accept or authorise bribes or facilitation payments.
- not direct, instruct, or allow your suppliers, business partners or other third parties to offer, give, request, accept or authorise bribes or facilitation payments on your behalf or on behalf of LRQA.
- only offer gifts or hospitality to LRQA colleagues in an open and transparent way and your gifts or hospitality must never be illegal or in the form of cash or vouchers. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.
- inform LRQA if you know of or suspect that a bribe or facilitation payment has been offered, given, requested, accepted or authorised in connection with LRQA.



## Sanctions and export controls

LRQA complies with all applicable laws and regulations related to sanctions and export controls.

### For our Business Partners, this means you must:

- comply with applicable laws and regulations related to sanctions and export controls.
- not take any action, or refrain from taking any action, that may cause LRQA to contravene sanctions or export control requirements.

## Fair business conduct, competition and anti-trust

LRQA competes fairly and in accordance with applicable competition and anti-trust laws.

### For our Business Partners, this means you must:

- comply with applicable competition and anti-trust laws.
- not co-ordinate with competitors or other third parties in a way that improperly restricts competition.
- not share confidential or commercially sensitive information with LRQA, which LRQA is not authorised to have.

## Accurate financial records and anti-fraud

LRQA maintains accurate and complete financial records of our business activities in line with applicable laws, technical and professional standards. LRQA does not engage in fraud.

### For our Business Partners, this means you must:

- not engage in dishonest or fraudulent activities, such as deceit or theft.
- never submit invoices which are false or contain misleading information.
- maintain accurate and complete financial records of your business dealings with LRQA.
- provide copies of financial records which relate to LRQA on request.

## Political activities and donations

LRQA has no political bias. We make no donations to political parties.

### For our Business Partners, this means you must:

- not make political donations in the name of, or on behalf of, LRQA.
- be open and transparent in any engagements with members of the political community in connection with LRQA.

## Prevention of tax evasion and money laundering

LRQA does not engage in money laundering or tax evasion, nor do we facilitate the tax evasion of others.

### For our Business Partners, this means you must:

- comply with applicable money laundering laws and regulations.
- not ask us to do anything which helps you to evade tax.
- not help others to evade tax in connection with LRQA activities.

# Together

## Inclusivity and equity

At LRQA, we believe in being respectful and embracing our differences. We forge strong relationships, show global awareness, embrace difference, and champion inclusivity. We have a zero tolerance approach to discrimination or harassment.

### For our Business Partners, this means you must:

- not tolerate bullying, harassment, discrimination or unfair treatment of any kind.
- promote equal opportunities for all and value diversity.
- operate in compliance with all applicable employment laws relating to working hours and pay.
- recognise that your employees have the right to choose whether to bargain collectively.

## Health, safety and wellbeing

The health, safety, security and wellbeing of people is critical to LRQA. We want our people to work in a safe environment, including when carrying out activities at client, supplier or other third-party premises. We strive to build a resilient health and safety system, based on trust and respect. Nothing is so important or urgent that it cannot be done safely.

### For our Business Partners, this means you must:

- be committed to providing a safe and healthy workplace, to minimise the risk of accidents and injury and to reduce exposure to health and safety risks, for all your employees, contractors, visitors and those in the community who may be affected by your activities.
- comply with all applicable health, safety and environmental laws and regulations. This includes providing appropriate personal protective equipment, establishing safety procedures and training programmes on workplace hazards and ensuring policies and procedures are in place to deal with any emergency situations.
- comply with LRQA's health, safety and environmental policies and procedures when carrying out activities for LRQA.
- inform LRQA of any health and safety accidents or incidents which occur whilst carrying out activities for LRQA.

## Working together

LRQA is committed to communicating clearly and transparently. We forge strong relationships which are built on trust and integrity. LRQA requires the same dedication and commitment to operating ethically and with integrity from our Business Partners.

### For our Business Partners, this means you must:

- always act fairly, honestly, transparently and with integrity in your interactions with LRQA and others in connection with your activities for LRQA.
- only engage with employees, agents, intermediaries, contractors, suppliers and joint venture partners who meet LRQA's and your ethical standards with regard to reputation and conduct.
- cascade the principles contained in this Code to your suppliers, contractors and business partners carrying out activities for LRQA.





## Protecting information

LRQA protects its confidential information and the third-party confidential information provided to us and ensures it is used for legitimate and authorised business purposes only. LRQA respects an individual's right to privacy and protects personal information in line with applicable laws.

### For our Business Partners, this means you must:

- protect confidential information shared by LRQA with you to prevent disclosure and only use it for authorised business purposes.
- never allow or knowingly facilitate the entry of unauthorised persons into LRQA offices or IT systems.
- protect LRQA's systems and electronic devices you have access to from theft, damage, or cyber attack.
- comply with applicable laws and regulations relating to the collection, processing, use and transfer of personal information and have appropriate controls in place to protect personal information, when collecting and processing personal information on behalf of LRQA.
- inform LRQA in the event of a potential or actual data breach as soon as practicable (and within 72 hours after discovery in any event), and work with LRQA to take all reasonable steps to mitigate its effects.

## Protecting property, resources and our reputation

LRQA property and resources, including IT systems, materials, places of work and equipment are used for legitimate business activities only.

### For our Business Partners, this means you must:

- only use LRQA property and resources for legitimate business activities, unless approved in advance.
- not use LRQA systems, to access, copy, store or transmit anything considered to be offensive, obscene, or inappropriate.

# Ambition

## Sustainability

Our Planet, Our Plan sets out our Environmental, Social and Governance (ESG) commitments to deliver a positive impact for our colleagues, clients, suppliers, communities and planet.

### For our Business Partners, this means you must:

- support and where applicable contribute towards our ESG commitments as set out in Our Planet, our Plan.
- manage your operations so any potential negative impact to the environment or community is prevented or, where unavoidable, minimised.

Our Planet Our Plan sets out our Environmental, Social and Governance (ESG) commitments to deliver a positive impact for our colleagues, clients, suppliers, communities and planet.



1. Governance



2. Community



3. Environment



4. Equity



5. Safety



2. Inclusivity



7. Education

## Modern slavery, human trafficking and child labour

LRQA is committed to upholding the human rights of our colleagues and those who we work with. We do not tolerate modern slavery, child labour or human trafficking and we demand the same commitment from those we work with.

### For our Business Partners, this means you must:

- conduct your activities free from modern slavery, human trafficking and child labour.
- prohibit the employment and exploitation of children under the age of 16 within your operations and not engage in or support the use of child labour. Workers under the age of 18 must not be asked to work on dangerous jobs that may affect their health and safety.
- prohibit and not benefit from any forms of forced or compulsory labour, including, without limitation, confiscating worker identity documents or holding workers in debt bondage or using military, prison or slave labour. All work must be conducted on a voluntary basis.
- develop and maintain appropriate policies and procedures to ensure that modern slavery, human trafficking and child labour are not taking place in your business or your supply chain.
- inform LRQA as soon as practical of any suspected modern slavery, human trafficking or child labour issues or concerns connected to your activities with LRQA.

# Expertise

## Empowering and investing in your people

We believe it is important to value and invest in our people; they are our greatest asset. We require colleagues to perform their role to the best of their ability in accordance with our policies and procedures, quality standards and/or applicable licences to operate, law and regulations.

### For our Business Partners, this means you must:

- make sure that individuals carrying out activities for LRQA, including any sub-contractors, have the necessary competence and experience to perform these activities.
- make sure that individuals carrying out activities for LRQA, are appropriately trained in all relevant systems and procedures before carrying out services for LRQA.
- never ask individuals to carry out assessments or inspections for LRQA which they are not qualified to do or are not trained on.

## Accreditations and qualifications

LRQA's accreditations are our licences to operate parts of our business. We carry out our accredited services in accordance with our quality management system.

### For our Business Partners, this means you must:

- never misrepresent the accreditations or other qualifications which you hold.
- carry out any accredited services for LRQA in line with authorised methods and procedures.

## About LRQA:

LRQA is a leading global assurance partner, bringing together unrivalled expertise in assessment, advisory, inspection and cybersecurity services – to help its clients negotiate a rapidly changing risk landscape.

Operating in more than 120 countries and recognised by over 30 accreditation bodies worldwide, LRQA covers almost every sector to achieve our purpose: shaping a better future together.

We're proud of our heritage, but it's who we are today that really matters, because that's what shapes how we partner with our clients tomorrow. By combining strong values, decades of experience in risk management and mitigation, and a keen focus on the future, we're here to support our clients as they build safer, more secure, more sustainable businesses.

From independent auditing, certification and training; to technical advisory services; cybersecurity consultancy and data-driven supply chain transformation, our innovative end-to-end solutions help our clients shape their own future, rather than letting it shape them.

## Get in touch

Visit [www.lrqa.com/uk](http://www.lrqa.com/uk) for more information, email [enquiries.uk@lrqa.com](mailto:enquiries.uk@lrqa.com)



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