



## NQA Certification Ltd t/a BM TRADA Ethics & Code of Conduct Agreement

**Document Reference:** BMTC-AG-04

**Issue No:** 10

**Issue Date:** 28.08.2024

**Effective Date:** 28.08.2024

**Author:** Vicki Howlett – General Manager

**Approved:** Liz Tapping – Quality Manager

The overall aim of certification is to give confidence to all stakeholders that a certified system fulfils specified requirements. The value of certification is the degree of public confidence and trust that is established by an impartial and competent assessment by a third-party such as NQA Certification Limited trading as BM TRADA.

This agreement includes a commitment to the principles for inspiring confidence in the certification process including:

- Confidentiality;
- Impartiality;
- Openness;
- Responsiveness to complaints;
- Anti-bribery and corruption.

BM TRADA insists on honesty, integrity and fairness in all aspects of its business and expects the highest standards of professionalism and ethical conduct to be maintained in all its activities. All BM TRADA employees, sub-contractors, subsidiaries, associated companies and authorised representatives have a commitment to ensure that they uphold the principles for inspiring confidence to all stakeholders in the delivery of certification services.

### General

When working for or on behalf of BM TRADA I confirm that I will:

- act with fairness, honesty and integrity at all times and comply with the BM TRADA Anti-Bribery and Corruption Policy and Procedure;
- act within the applicable laws and legislation;
- undertake certification activities in accordance with BM TRADA procedures and guidelines and to comply with applicable accreditation requirements
- work safely, upholding the BM TRADA health & safety policies and practices;
- communicate clearly, effectively and openly;
- be accountable for my actions;
- treat colleagues, clients and other stakeholders with an appropriate level of respect and consideration;
- respect matters of faith, conscience and diversity in their widest sense;
- avoid behaviour that could be regarded as harassment, bullying, exploitation or intimidation;
- safeguard the reputation and assets of the company;
- co-operate fully with any investigation in the event of any alleged breach of this code of conduct.

### Confidentiality

When working for or on behalf of BM TRADA I confirm that:

- I will maintain the confidentiality of all information obtained or created during the provision of certification services;
- I shall not disclose any information about a particular certified client or individual to a third party without written approval from BM TRADA;
- If I intend to place any client information in the public domain I will obtain written approval from BM TRADA;



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- If required by law or authorised by contractual arrangements (i.e. Accreditation body) to release confidential information I shall obtain written approval from BM TRADA before release of such information;
- I will maintain equipment and facilities that ensure the secure handling of confidential information

### Impartiality

Being impartial and being perceived to be impartial is critical for BM TRADA to deliver certification that provides confidence. All BM TRADA employees, sub-contractors, subsidiaries, associated companies and authorised representatives shall not allow commercial, financial or other pressures to compromise impartiality.

When working for or on behalf of BM TRADA I confirm that:


- I will avoid situations where a threat to impartiality or objectivity arises, or where potential conflict of interest could exist, or be seen to exist;
- I will declare any conflicts of interest where I have been employed, provided consultancy for or connected with a client in any way. All declarations will be made regardless of the time period.
- I will not be involved in any of the certification process for that client, including audit, report review, complaints, disputes or appeals and certification decision making for a minimum period of 3 years after any connection with a client.
- I will declare in writing immediately to BM TRADA any situation known to me that presents me or BM TRADA with a conflict of interest. Examples of such situations include but are not limited to:
  - **Self-interest threats:** threats that arise from a person or body acting in their own interest to benefit themselves;
  - **Self-review threats:** threats that arise from a person or body reviewing the work done by themselves. An individual / organisation auditing the system(s) / product(s) of a client to whom the individual / organisation has provided consultancy would be a self-review threat;
  - **Subjectivity threats:** Threats that arise when personal bias overrules objective evidence;
  - **Familiarity threats:** threats that arise from a person or body being too familiar with or trusting of another person e.g. An auditor or staff member developing a relationship with an applicant / certified organisation that affects the ability to reach an objective judgement;
  - **Intimidation threats:** threats that prevent person(s) from acting objectively due to fear of a person / organisation / interested party;
  - **Financial threats:** threats that arise from sources of revenue.

### Openness

Where required by BM TRADA you must disclose information requested to ensure the openness and transparency required for maintaining the integrity and credibility of the certification process.

### Responsiveness to complaints and stakeholder concerns

Parties that rely on certification expect to have complaints / stakeholder concerns investigated and if these are found to be valid, should have confidence that the complaints / stakeholder concerns will be appropriately addressed and that a reasonable effort will be made to resolve the complaints / stakeholder concern. Effective responsiveness to complaints / stakeholder concerns is an important means of protection for the certification body, its clients and other users of certification against errors, omissions or unreasonable behaviour.

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When working for or on behalf of BM TRADA I confirm that I will be open to investigation of complaints / stakeholder concerns. If these are found to be valid I will allow such complaints to be appropriately addressed and will assist in the resolution as required.

**Anti-Bribery and Corruption**

BM TRADA does not engage in bribery or corruption in any form and has a zero tolerance approach to breaches of this policy, whether it involves private individuals or public officials. The Anti-Bribery and Corruption Policy and procedure applies in all jurisdictions where we do business - irrespective of any applicable local or international legal or regulatory obligations. Notwithstanding this, BM TRADA is committed to comply with all anti-bribery and corruption legislation and regulation applicable to its businesses and people.

In line with the requirements of the Anti-Bribery and Corruption Policy, when working for or on behalf of BM TRADA I confirm that I must never solicit, accept, agree to receive, promise, offer or give a bribe, facilitation payment, kickback or other improper payment.

If you require clarification on any aspect of this agreement you should seek the advice of your line manager or the Compliance Department as appropriate.

**This document is issued under the authority of and approved on behalf of BM TRADA:**

**Name:** Vicki Howlett – General Manager

**Acceptance of and Undertaking**

- I declare that I have read, understand and accept the Ethics & Code of Conduct Agreement as detailed above and agree to comply with its requirements in full
- I declare that I have read, understand and accept the Anti-Bribery and Corruption Policy and Procedure and agree to comply with its requirements in full

**Name:**

**Signature:**

**Affiliated BM TRADA Office:**

**Member of office staff:** Yes / No

**Auditor:** Yes / No

**Date:**