

Purpose of This Policy

The purpose of this policy is to ensure compliance by all employees, officers and directors of CPG and its Joint Ventures, with both CPG's internal anti-corruption requirements and legislation relevant to the countries in which CPG operates.

Policy

Employees, officers and directors of CPG are expressly prohibited from accepting, requesting, soliciting or demanding, payments (or any financial inducements) for the purpose of influencing the certification process.

Employees, officers and directors of CPG are expressly prohibited from accepting gifts or intangible inducements (such as social advancement, upgrades or holidays), other than culturally appropriate items of nominal value, for the purpose of influencing the certification process.

Employees, officers and directors of CPG are expressly prohibited from colluding with other parties, either staff or external to CPG, for the purpose of influencing the either the certification process or the certification market.

Employees, officers and directors of CPG shall inform and/or consult with CPG any actual, potential or perceived conflicts of interest as soon as they arise.

About the Policy

Corruption is the abuse of position for the purpose of obtaining benefit. In the certifications industry, corruption is the abuse of the power to influence the certification process, for the benefit of obtaining personal financial or other advantage. Corruption damages the integrity of the certifications process, the business interests of CPG and is illegal in most jurisdictions.

Collusion is an agreement between two or more parties to gain an advantage. In the certifications industry, collusion could occur between certifications personnel and clients, or between members of rival certification bodies for the purposes of influencing the market. Collusion damages the integrity

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of the certifications process, the business interests of CPG, the reputation of the certifications industry and is illegal in most jurisdictions.

Corruption and collusion arise from conflicts of interest. Whilst CPG recognises that not all conflicts of interest will result in corrupt behaviour, it also recognises that corruption or collusion can occur if conflicts of interest are not managed. As an international company operating in diverse political and cultural environments, CPG wishes to clarify acceptable behaviours for all personnel at all levels of the certifications process. For further explanations refer to the CPG Conflict of Interest Guidance document.

The policy consists of the following:

a prohibition from accepting, requesting, soliciting or demanding payments (also called bribes, kickbacks, baksheesh, facilitation payments etc.) or gifts for the purpose of influencing the certification process i) a prohibition from entering into collusive agreements with other parties for the purposes of influencing the certification process, ii) a prohibition from entering into collusive agreements with other parties for the purposes of influencing the certification market iii) an undertaking to inform CPG of any potential, actual or perceived conflict of interest as soon as it arises.

AUTHORISED BY

Ad Jild

Tony Wilde Group Chairman CPG 25 March 2019

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