

CODE OF CONDUCT



A MESSAGE FROM THE AMSPEC CEO



Uncompromising integrity, professionalism, and sustainability are the cornerstones of AmSpec's mission to provide professional and reliable testing, inspection, and certification services. We are dedicated to exceeding customer expectations by empowering our employees everywhere to provide unparallel levels of service. How we treat one another and our stakeholders—from customers and partners to suppliers and all the communities where we work and live—is the key to our past, current, and future success.

This Code of Conduct provides guidance to help all of us make ethical decisions at work. Integrity is essential to every project, every team, every office, and every relationship that we earn around the globe. We support you in making the right decisions by providing education, training, and multiple resources to ask questions or raise concerns. Simply put: Do the right thing. Obtain guidance when needed. Always be truthful and ethical.

Thank you for your commitment to compliance, ensuring we do business the AmSpec Way.





AmSpec's Code of Conduct (the "Code") is your guide to conducting business with integrity. At AmSpec, there are no acceptable reasons for violating applicable laws, regulations, standards, the Code of Conduct and/or AmSpec's policies and procedures.

Know Your Code of Conduct

Understand Your Responsibilities



Ask Questions and Report Concerns

Confidentiality and Retaliation





Know Your Code of Conduct

The Code is the foundation for the "AmSpec Way" of doing business. It requires AmSpec employees, directors, and officers to not only comply with all applicable laws, regulations and standards that apply to our work, but also to conduct our business with honesty, respect and fairness. We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code.

The Code does not attempt to cover every possible issue we face in our work, but it provides valuable direction and sets clear expectations for how we interact with our customers, our employees, and other stakeholders. Before taking any action on behalf of AmSpec, we should always be confident that it complies with the Code. Doing this will ensure that we deliver what our customers expect – testing, inspection and certification services with integrity.

Understand Your Responsibilities

- Always act in a professional and ethical manner. Be aware that your behavior reflects on our company.
- **Be** familiar with the information contained in the Code, our Corporate Policies and Procedures, as well as any other policies and procedures that apply to your role.
- Cooperate with internal investigations, audits, and other similar inquiries.
- Remember that pressures or demands are never an excuse for violating the law, our Code or any other AmSpec policy or procedure.
- Promptly report any suspected illegal or unethical behavior using any of the available reporting resources.

Complete all required trainings and do your best to take advantage of optional trainings.

Additional Responsibilities of AmSpec Managers

To lead with integrity, managers should also:

- Lead by example and be a role model for ethical behavior by creating an environment where honesty, integrity and openness are valued and where everyone feels comfortable asking questions.
- ▶ Be a resource for your team, others and the third parties we work with.
- Do your part to ensure that no one who speaks up suffers retaliation.

AmSpec will not tolerate violations of the Code, its policies and procedures, or any of the laws, regulations and standards that apply to our business. Violations may give rise to disciplinary action, up to and including termination of employment, engagement, or affiliation with the company. Certain actions may also result in legal proceedings, penalties, or criminal prosecution. Any waiver or exception to the Code requires the prior written approval of the AmSpec Chief Legal Officer or, in certain circumstances, the AmSpec Board of Directors or a committee thereof.

AmSpec is a proud member of the TIC (Testing, Inspection and Certification) Council, an association of companies whose business is to verify their clients' or third parties' products, services or systems. The value that TIC Council Members provide to their clients is trust. For this reason, AmSpec adopts the TIC Council's Compliance Code as part of this Code, which focuses on similar areas of compliance (integrity, conflicts of interest, confidentiality and data protection, anti-bribery, fair business conduct, health and safety and fair labor). Click here to access the TIC Council Code.

Cooperate With Government Authorities

Always cooperate with government authorities in connection with requests for information or facility visits.

- Comply and cooperate with government inspections, investigations, or requests for information.
- If you are responsible for helping respond to a government request, tell the truth. Never mislead anyone, impede their work, or conceal, destroy, or alter documents.
- The Legal function must be notified of all non-routine government visits.

Ask Questions and Report Concerns

Each of us has a responsibility to help protect the reputation and integrity of AmSpec. We have an Open Door policy to help ensure that questions and concerns are raised so that they can be appropriately addressed. If you see or suspect illegal or unethical behavior, you have several reporting resources:

- Discuss with your manager.
- Discuss with any other member of management, Human Resources or the Legal function.
- Contact the **Compliance team** confidentially:
 - D By email: Compliance@amspecgroup.com
 - D By mail or in person: AmSpec Corporate Headquarters 1249 S. River Road, Suite 204, Cranbury, NJ 08512 (US) Attention: Chief Compliance Officer
- At any time, you may contact **AmSpec's Compliance Helpline**, which is an independent third-party operated reporting resource available 24 hours a day, seven days a week, in all languages. You can contact the helpline online at https://amspeccompliancehelpline.com/, or by telephone at +1-866-291-4320.

You may use the helpline anonymously, subject to local laws

When in doubt, please ask. AmSpec is here to support you!



How to use the Compliance Helpline

Our Helpline is a confidential way to report possible violations of the Code, AmSpec's policies and procedures, or any other laws, regulations or standards. You may contact the Helpline at any time via telephone or using the online web tool.

When you contact the Helpline by telephone, a third-party Ethics specialist will listen, ask clarifying questions if necessary, and then write a summary of the call; if you use the online web tool, your will type your own answers. It is important to provide as many details as possible, e.g., who, what, when, and where. The summary will then be provided to the Compliance team for assessment and further action.



Confidentiality and Retalition

It is important that you feel secure when asking questions, making a report, or assisting with a compliance investigation. If you disclose your identity, every effort will be made to keep identity confidential; however, in some instances, information may be shared on a need-to-know basis and/or AmSpec may be required by law to report certain types of misconduct.

Retaliation is never tolerated in any form. AmSpec will not allow retaliation against anyone who reports in good faith any known or suspected improper conduct or a breakdown of our business controls, nor will we tolerate retaliation against anyone who participates in an investigation. If you believe you have been retaliated against or have witnessed retaliation, report it using any of AmSpec's reporting resources.



- Q: Do I have to be certain that there is an actual violation of our Code before reporting my concern to AmSpec?
- A: No. We encourage people to make reports if they suspect wrongdoing. You don't need to be certain before reporting, and we ask you not to investigate the matter yourself.

People make the difference. Everyone is entitled to a workplace that is safe, fair, respectful, and free of discrimination, harassment, and intimidation.

Respect in the Workplace

Health and Safety

Data Privacy

Conflicts of Interest





Respect in the Workplace

Our workplace environment should be free from any fear of harassment or discrimination. This includes actions that are offensive or threatening, as well as any form of sexual harassment or bullying. The following are key steps to help ensure that we maintain a safe, respectful, and comfortable workplace for everyone:

- ▶ Treat others as you wish to be treated.
- Keep an open mind to new ideas and opinions, and please listen to the viewpoints of others.
- Speak to your manager or another reporting resource about inappropriate behavior, comments, or other offensive communications.

AmSpec complies with all applicable employment, labor, and immigration requirements. We are committed to equal employment opportunities and prohibit discrimination and harassment based on race, color, ethnicity, creed, ancestry, religion, sex, sexual orientation, age, gender identity or gender expression, national origin, marital status, pregnancy, childbirth or related medical condition, genetic information, military service, medical condition (as defined by local law), the presence or perception of a mental or physical disability, veteran status, or other characteristics protected by applicable laws.



- Q: My team gets along well and likes to tell jokes. Recently this has gotten out of hand and has become offensive with people telling sexist jokes. What should I do? I don't want to cause any problems.
- A: Making jokes of a sexual or sexist nature is unacceptable. You should raise this concern with your manager or another reporting resource (remember: your identity can be confidential or anonymous).

Health and Safety

AmSpec is committed to providing a safe, healthy, and secure environment for our employees, contractors, visitors, and others with whom we interact with in the course of business. We prioritize health, safety, and security ahead of business objectives and take steps to eliminate or avoid unsafe conditions and to protect our operations, property, assets, and reputation. We foster a workplace that promotes our employees' physical, mental, and social well-being.

We also believe that human trafficking and forced labor are unacceptable, and we are committed to preventing these practices in our operations and supply chain. We expect all those who do business with AmSpec to share this commitment.

Keep in mind:

- **Put safety first.** Protect each other from injury by following all safety rules and practices.
- Know and follow emergency procedures. It is important to know what to do when there is an emergency, such as an accident, injury, fire, natural disaster, or security incident, and to follow those procedures in a calm and orderly way.
- Report risk, hazards, accidents, injuries, and unsafe practices or conditions. Always report injuries, near misses, potential unsafe conditions, and health, safety, or security risks, including environmental hazards and threats or acts of violence. You play an important role by following all procedures relating to storage and handling, including maintaining clean, sanitary, and safe conditions in all our work locations.
- Never misuse alcohol, drugs, or other substances in the workplace. No use or possession of alcoholic beverages on company property, except where alcohol is specifically permitted at an AmSpec-sponsored event. You also may not use, possess, purchase, distribute, or sell illegal drugs on AmSpec property or while you are engaged in any job-related activity. In addition, if you drive as part of your role, you should do so lawfully and never check emails or texts while driving.
- ▶ **Never bring weapons to work.** AmSpec prohibits bringing weapons into the workplace or carrying them while conducting company business.

- Q: I work as part of a team in a warehouse and one of my peers recently showed up for work under the influence of alcohol. I worry that they will have an accident and get hurt, or maybe even hurt someone else. What should I do?
- A: Safety is in everything we do. You should raise this immediately with your manager, or another trusted reporting resource (remember: your identity can be confidential or anonymous).

Data Privacy

We respect the privacy of employees, as well as others with whom we conduct business. It is AmSpec's policy to keep personal information confidential and secure. Data privacy laws around the world address the processing of personal information, including collection, storage, use, sharing, transfer, and disposal. Always handle personal information (e.g., name, address, telephone number, email address, financial information, religious beliefs, medical data) with care in accordance with company policy and applicable privacy laws.

- Ensure that the personal information you process is safe, secure, and accurate.
- Collect and use personal information for legitimate business purposes only and limit the collection to information that we really need.
- Limit access of personal information to authorized individuals and use care when sharing such information with third parties.
- Allow individuals whose personal information is held by the company to exercise their individual rights to access, delete, and update the information.
- Do not retain personal information for a longer period of time than can be justified by law.

 Most importantly, immediately report any potential data breach, whether it is at AmSpec or at a third party we work with, to the Legal function.



Conflicts of Interest

Our work-related decisions and how we perform our jobs should always be based on what is best for AmSpec, not for us personally. Conflicts of interest are situations in which your objectivity in performing your job is – or could be – impaired by something that benefits you, whether that be financially, emotionally, or in any other way. If a reasonable person would see the situation as compromising your integrity, you have a conflict of interest.

WHAT SHOULD I DO?

- Q: My son owns a safety goggle business and would like to be a supplier to AmSpec. I am working on a project involving new safety equipment. Can I suggest my son's company to the project team?
- A: No, if you have a family relationship with an actual or potential supplier to AmSpec, you should not be involved in any way with approving, managing, or influencing AmSpec's relationship with that business. You should also disclose this conflict of interest should your son's business be selected as a supplier for AmSpec in the future.

At AmSpec, we try to avoid conflicts of interest, but where they cannot be avoided, we manage them. Employees with an actual, potential, or perceived Conflict of Interest are required to disclose it and are not allowed to continue to engage in the conduct or transaction until they receive the appropriate approval from their manager and the Compliance Team.

After receiving your disclosure, the Compliance team will consult you and your manager, where appropriate, and may suggest measures to mitigate the conflict of interest. You are then responsible for implementing the measures, and for promptly updating your disclosure if there are any significant changes in the circumstances upon which the approval was granted.

Potential Conflicts of Interest requiring disclosure and pre-approval include, but are not limited to, the following:

- Personal relationship with another AmSpec employee;
- Personal relationship with a supplier;
- ▶ Relative as a customer;
- Financial investment in a supplier;
- ▶ A paid or unpaid employment outside of AmSpec;
- ▶ Board membership outside of AmSpec; and
- Personal dealings with a third party that AmSpec does business with.

How to disclose an actual or potential Conflict of Interest

The process for disclosure is simple, confidential, and fair. You can use the disclosure system or contact the Compliance Team directly to disclose a conflict.



We rely on our employees and the third parties we work with to deliver a memorable experience that our customers can truly appreciate while meeting our high ethical and quality standards. AmSpec commits that it operates in a professional, independent, and impartial manner in all its activities. AmSpec reports data, test results, and other material facts in good faith and expects the same from all third parties.

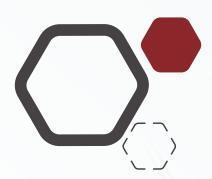
Anti-Bribery and Anti-Corruption

Trade Compliance



Fair Business Conduct and Fair Competition

Gifts, Meals, Entertainment and Travel





Anti-Bribery and Anti-Corruption

AmSpec does not bribe anyone, anywhere, for any reason, nor do we engage in any other form of corruption. We must never attempt to improperly influence or impact the professional objectivity of Government Officials, private individuals, or any other third parties with whom we do business. We always apply good judgment and moderation when giving or receiving anything of value.

All AmSpec employees, directors, officers, suppliers, agents or other third parties acting on our behalf, no matter where they are located, must comply with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. We keep accurate books and records of our business transactions in accordance with applicable laws and regulations, including anything of value given to Government Officials.

We know that corruption can harm our reputation and cost millions in fines, but there is an even more important point – its not the way AmSpec does business.

ANTI-CORRUPTION DO'S AND DON'TS

DO:

- Record all payments and expenses accurately in our books and records.
- Obtain required approvals for gifts, meals, travel, and entertainment.
- Conduct due diligence on third parties who will interact with Government Officials on behalf of AmSpec.
- Report any suspected or actual corruption immediately to any of AmSpec's reporting resources.

DON'T:

- Never give or accept cash or cash equivalents, e.g., a gift card.
- ➤ Don't give anything of value that improperly influences or impacts the objectivity of business decisions with any third party, not just Government Officials.
- ➤ Never use a third party to make improper payments or take illegal actions.

REMEMBER:

We are not only responsible for our actions, but also for the actions of any third parties who act on behalf of AmSpec.

Bribery can be anything of value that is given to influence the behavior of someone in the government or private sector in order to obtain an improper business, financial, or commercial advantage. A bribe can be a kickback, a gift, a meal, a favor, even an offer of a loan or job could be considered a bribe.

Never "look the other way" if you become aware of potential misconduct; instead, be aware that not reporting a bribe or other illegal activity may in itself be a violation of law, the Code, and a company policy.

We simply do not engage in any form of bribery or corruption, even if it means walking away from business opportunities or missing a deadline.

- Q: I am submitting a proposal to a government agency. My friend suggested that if I invite the government official who will decide the matter to dinner, it will go a long way to getting a positive outcome. Is this okay?
- A: No. This is bribery. While it may be appropriate to meet with government officials to discuss AmSpec, it is not okay to provide anything to influence them.

Trade Compliance

Many laws govern the conduct of trade across borders, particularly because of money laundering and terrorist financing. As a global company, we follow applicable international trade laws and regulations, including trade and economic sanctions administered by the U.S. Department of the Treasury's Office of Foreign Assets Control and the U.S. Department of State.

Sanctions programs restrict trade and transactions with certain countries, territories, entities, vessels, and individuals. These can include trade embargoes, travel bans, or the freezing of assets or transfers. We protect AmSpec and the global community by complying with these, and by conducting sanction checks and other due diligence before doing business with a supplier or customer.

With that in mind, we will never:

- Proceed with a transaction if we know a legal violation has or is about to occur;
- Conduct business with or benefiting a sanctioned individual or entity;
- ▶ Transfer controlled products unless appropriate authorizations are obtained; or
- Apply an inappropriate monetary value to goods or services.

Trade sanctions, including financial sanctions, are complex. If you are involved in transactions, such as business dealings with a sanctioned country, entity, or person, you must ensure compliance with applicable trade laws by contacting the Compliance Team.



Fair Business Conduct and Fair Competition

AmSpec strives to be fair and ethical in all our dealings with our internal and external stakeholders. We do not take unfair advantage of anyone through manipulation, concealment, misuse of confidential information, misrepresentation of facts, or any other unfair dealing or practice.

- ▶ We purchase supplies and services and select the third parties we work with based on need, price, terms, and other relevant conditions.
- We protect the confidential and proprietary information of our customers and third parties.
- When we collect business intelligence, we must always live up to our standards of integrity and never engage in fraud, misrepresentation, or deception to obtain information.
- When we hire former employees of competitors, we must respect their obligation not to use or disclose the confidential information of their former employers.



AmSpec believes in free and open competition. We gain competitive advantages through the quality of our work, not through unethical or illegal business practices.

Every country where we operate has laws that govern relationships with competitors, suppliers, distributors, and customers. While the legal requirements vary, fair competition laws generally share the same objective: to ensure that markets operate efficiently by providing competitive prices, customer choice, and innovation.

Gifts, Meals, Entertainment and Travel

An occasional gift or offer of hospitality (e.g., meals, travel, entertainment) is often viewed as a normal part of doing business, but sometimes even a well-intentioned gift can cross the line.

At AmSpec, employees may only give or accept modestly valued gifts and hospitality that are a reasonable complement to business relationships and do not improperly influence others. We do not accept or provide gifts or hospitality if the intent is to bias a decision or is in return for any business, services, or confidential information.

When giving or accepting gifts or hospitality, all of the following guidelines must be met:

- It must be modest in value and not frequent.
- It must not appear to influence or give the appearance of influencing the business judgment of the recipient.
- It must be made with a legitimate business purpose.
- It must be made openly and transparently, be reasonable and appropriate to the relationship and customs, and not cause embarrassment by its disclosure.
- If it is being made to a Government Official, you have obtained Legal approval.

Reach out with questions or concerns

Like global trade laws, the fair competition and anti-trust laws are complex. Compliance requirements can vary depending on facts and circumstances.

Keep in mind that agreements do not have to be signed contracts to violate competition laws. An informal understanding between you and competitor, partner, supplier, or customer (or even a conversation that implies an understanding) may be a problem.

Consult with the Legal function if these topics come up and/or you have any questions or concerns about anti-competition rules around the world.

Government Officials

Extra care needs to be taken when dealing with government officials as there are complex rules governing the giving of gifts, hospitality, and other business courtesies to government officials. What may be permissible for commercial customers may be illegal when dealing with the government.

This last section of the Code focuses on the other ways AmSpec operates to ensure integrity and compliance is at top of mind for employees.

Accurate Recordkeeping

Confidential Information

Use of Company Assets

Political and Charitable Activities





Accurate Recordkeeping

Customers, investors, government authorities, and all of our other stakeholders rely on our accurate and complete business records including but not limited to testing and inspection reports, certifications, health, safety and quality documentation, and financial records. Such information is also essential within AmSpec so that we can make informed business decisions.

All books and records must be accurate, timely, complete, and in compliance with applicable principles and our internal controls. It is the responsibility of our employees to report any false entries in the books and records of AmSpec, and also to avoid destruction of any documents that may be subject to retention in accordance with company policy, a legal hold, or a subpoena.

WHAT SHOULD I DO?

Q: You notice your supervisor repeatedly skipping requirements in the lab, and when you tried to question your supervisor, you were told not to worry about it because the product was still safe.

A: Report immediately to one of AmSpec's reporting resources.

Confidential Information

The unauthorized use or release of confidential information may result in loss of competitive advantage and damage to our reputation or our relationships with customers and third parties. For this reason, the access, storage, transmission, and use of confidential information must be consistent with our policies and procedures.

- Disclosure of confidential information to a third party requires appropriate approval and a confidentiality agreement; if in doubt, check with your manager or the Compliance Team.
- Disclosure of confidential information should be limited only to that information necessary to achieve the legitimate business purpose.
- Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- Do not share passwords or allow other people, including friends and family, to use our information technology resources.
- Do not discuss confidential information in public places where others may overhear.
- ▶ Be aware of suspicious telephone or email requests from outsiders seeking information (commonly known as "phishing").

Examples of confidential information include but are not limited to:

- Business plans
- Trade secrets
- Intellectual property
- Sales and profit figures
- Pricing
- New marketing plans
- Research and development ideas
- Information about potential acquisitions, divestitures, and investments





Each of us is entrusted with the care of AmSpec assets; we must be proactive in protecting them from loss, damage, theft, waste, and improper use. AmSpec assets include physical property, facilities, equipment, inventory, supplies, corporate opportunities, financial resources, confidential information, files and documents, computer networks, and their content.

- Our assets must not be given or sold to anyone without appropriate approval.
- Guard our intellectual property and respect the intellectual property of others.
- Only use authorized software, devices, and procedures.
- Unauthorized devices, such as home computers, may not be used to transmit, store, or work on AmSpec confidential information.

You should have no expectation of personal privacy when using AmSpec systems. Emails, instant messages, texts, and voicemails are considered company property. Limited personal use of phones and computer systems is allowed as long as it does not have a negative impact on your performance, productivity, or the work environment.

Political and Charitable Activities

Laws may limit or prohibit companies from making contributions to candidates for political office, political parties, political action committees, ballot measure committees, labor unions, and party officials. Political contributions can also violate anti-corruption laws if they are made to improperly obtain or retain business or otherwise advance a business purpose. Remember that political contributions include not only direct payments, but also advances, goods or services, and in-kind contributions such as participation in political campaigns during working hours and use of administrative support, company facilities, equipment and supplies. Any political contributions made on behalf of AmSpec must be approved in advance in writing by the Legal function. AmSpec will not reimburse any personal political contributions.

Cybersecurity



We are increasingly dependent on networks, databases, and the information they contain. Each of must do our part to protect our data and information systems from accidental and intentional breaches:

- Make sure you follow AmSpec policies and practices that are designed to protect our network, computers, programs, and data from attack, damage, or unauthorized access.
- Protect your user names and passwords.
- ▶ Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.
- Don't open suspicious links in emails, even if you know the source.

Charitable donations made on behalf of AmSpec must also be approved in writing by the Legal function. It must be clear that the donation is not a disguised way of indirectly providing a benefit to a customer, vendor, or any other third party with whom AmSpec does business; be extra vigilant if the request originates from a government official or if the recipient is linked to a government official.

Reminders about political and charitable activities

- Never use AmSpec's funds, assets, or facilities to support any charity, cause, political candidate, or party unless specifically permitted by law and expressly authorized in writing by the Legal function.
- ▶ Holding or campaigning for political office must not create, or appear to create, a conflict of interest with your duties at AmSpec.
- Do not solicit contributions or distribute political literature at AmSpec.
- Never make a political or charitable contribution with the intent to improperly influence someone.

- Q: I am helping my good friend run for a government position. I think more people would vote for them if I tagged an AmSpec social media account. Can I do that?
- A: No. You are free to participate in legal and permissible personal political activities. However, you must clearly distinguish between your views and the views of the company and ensure your activities do not reflect poorly on AmSpec.



COMMIT TO COMPLIANCE AT



If you see or suspect illegal or unethical behavior, you have several reporting resources:

- Discuss with your manager.
- Discuss with any other member of management, Human Resources or the Legal function.
- Contact the **Compliance team** confidentially:
 - D By email: Compliance@amspecgroup.com
 - D By mail or in person: AmSpec Corporate Headquarters 1249 S. River Road, Suite 204, Cranbury, NJ 08512 (US) Attention: Chief Compliance Officer
- At any time, you may contact **AmSpec's Compliance Helpline**, which is an independent third-party operated reporting resource available 24 hours a day, seven days a week, in all languages. You can contact the helpline online at https://amspeccompliancehelpline.com/, or by telephone at +1-866-291-4320.

You may use the helpline anonymously, subject to local laws.

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