



THINK **INTEGRITY**  BUILD **TRUST**

# SGS Code of **Integrity**

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# Message from the Chair of the Board and CEO

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Dear colleagues,

**Integrity is at the core of SGS business. The trust that we inspire in our customers and stakeholders is the key to our success as an organization and as individuals.**

As leaders in our industry, we hold ourselves to the highest standards of professional behavior and integrity in all our business operations.

Our Code of Integrity lays the foundation for our actions and

embodies the core values which are shared throughout SGS, its various businesses and affiliates. The Code serves as a guide for decision-making to help all of us navigate complex situations.

We are the custodians of the SGS brand and reputation, and we continuously strive to defend the values they represent in the marketplace. To this end, we are committed to conducting ourselves with honesty and transparency in our interactions with each other, our customers and our partners.

As part of this commitment, we encourage an open culture in which we can exchange ideas and information, seek advice and raise concerns, without fear of retaliation.

The SGS Code of Integrity allows us to align our actions with SGS principles. Together, we can maintain the highest standards of integrity and enable a better, safer and more interconnected world.



**Calvin Grieder**  
Chair of the Board of Directors



**Géraldine Picaud**  
Chief Executive Officer

# SGS culture of **integrity**

## **ETHICAL PRINCIPLES**

### **TRUST**

Trust is our single most valuable asset, the foundation of our brand and reputation. Customers and third parties rely on our integrity and trust needs to be nurtured and safeguarded day after day. It can be jeopardized in an instant.

### **HONESTY AND TRANSPARENCY**

In everything that we do, we need to be truthful to ourselves, our colleagues, customers and stakeholders. No circumstance justifies lies, deceit or a lack of honesty.

### **ACCOUNTABILITY**

Each of our actions and omissions has consequences.

We accept the consequences of our choices and do not blame others for our actions.

### **IMPARTIALITY**

We believe in acting ethically, with fairness and objectivity. Our decisions are guided by respect for our principles and standards of good behavior, not by arbitrary choices or personal preferences.

### **ASK YOURSELF THE RIGHT QUESTIONS**

When in doubt about a particular course of action, ask yourself the following questions:

- Do I suspect that the particular course of action may be illegal or unethical?

- How would it look if this course of action was reported in the media, or if I were to discuss it with my family and friends?
- Does the proposed course of action involve lying or being untruthful?
- Could the proposed course of action endanger the personal security, safety or health of others?
- Could the proposed course of action damage SGS or its reputation?
- Does the transaction have a legitimate business purpose?

If the proposed course of action fails any of these questions, you should seek guidance and reconsider your decision.



# SGS Code of Integrity **implementation**

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## **TRUST IN THE CODE**

The success of SGS rests on the trust it earns day after day from customers, employees, shareholders and other stakeholders in the communities in which it conducts business.

SGS is focused on maintaining this trust through the effective implementation of this Code of Integrity.

## **LIVE THE CODE**

The Code applies to all employees, officers and directors of SGS SA and its affiliated companies.

Third parties acting on behalf of, or representing SGS, must adhere to all aspects of the Code, including where reference is made to SGS and its employees.

## **UNDERSTAND THE CODE**

It is the personal responsibility of each SGS employee to read and understand the Code and commit to uphold its principles. Employees are required to participate in periodic integrity training. Employees in management roles must also ensure that all direct reports have been properly trained, fully understand the content of the training course and are able to comply with and apply the Code.

## **APPLY THE CODE**

The Code of Integrity is approved by the Board of Directors of SGS SA, that oversees its implementation along with any other supervisory body that it may appoint.

The SGS Group Chief Compliance Officer determines SGS group-wide compliance strategies and supervises the Business Ethics function that manages the SGS Integrity Program through a network of compliance specialists.

The Code takes effect from May 2024 and replaces the previous 2012 version.

SGS affiliates may adopt more detailed or restrictive policies in areas covered by this Code.

Employees in management roles must ensure that employees under their supervision act with integrity and comply with the Code.

## **SEEK GUIDANCE ON THE CODE**

SGS is committed to a culture where issues of integrity and professional ethics can be raised and discussed openly.

Guidance and support are available to help employees understand the Code and assist them to make the right decisions when faced with ethical dilemmas. Employees in management roles are expected to be responsive to anyone who seeks guidance or raises concerns and treat them seriously and in confidence.

When in doubt about the meaning of the Code or its application to specific circumstances, SGS employees are encouraged to use the SGS Integrity Helpline which offers various options to ask questions and seek guidance in several languages and can do so anonymously.

## **UPHOLD THE RULES OF THE CODE**

Any breach of the Code, however small, can harm SGS's reputation and brand, and therefore is not tolerated. Violations of the Code will result in disciplinary action, including possible termination of employment and criminal prosecution for serious violations.

## **REPORT VIOLATIONS OF THE CODE**

SGS employees and third parties are encouraged to speak up and report any suspected or known violation of the Code using the SGS Integrity Helpline. It is a safe and secure platform that offers various options to file a report in several languages. Reports can be filed anonymously.

Any information provided is stored securely and is treated with the utmost confidentiality.

Employees in management roles to whom suspected or known violations of the Code are reported must escalate them in accordance with the applicable SGS Group policies.

## **NO RETALIATION**

SGS protects employees from any form of retaliation or adverse consequences for seeking advice, raising concerns and reporting violations of the Code in good faith. Retaliation against an SGS employee for having reported violations of the Code in good faith is strictly prohibited and will result in disciplinary action.

To ask a question, seek guidance, raise a concern or report an integrity violation, please go to: <http://integrityhelpline.sgs.com>.

# SGS Code of Integrity **rules**

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# Conducting business

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## INTEGRITY OF SERVICE

### SERVICE DELIVERY

All SGS services must be undertaken professionally and honestly in accordance with the applicable SGS Group policies, standards and methods.

SGS maintains its independence of judgment and does not surrender to pressure to misrepresent findings or alter the results of its inspections, certifications, audits or testing. All findings must be adequately documented, and no untruthful or misleading reports or certificates are to be issued.

### PROCESS INTEGRITY

All documentation related to services performed by SGS, in both physical and digital form, must be complete and accurate, maintained and archived in accordance with the applicable SGS Group policies. Access to such documentation, including any modification, alteration, addition and deletion thereof, must be recorded in accordance with the applicable SGS Group policies.

### SERVICE EXPERTISE

SGS's core competencies include the skills, knowledge and qualifications needed to successfully execute its services and deliver value to customers and stakeholders. SGS employees are expected to be honest and transparent regarding their qualifications. The misrepresentation of qualifications and credentials or their acquisition through cheating or other fraudulent means is considered unethical and dishonest and is strictly prohibited.

## SUPPLIERS AND BUSINESS PARTNERS

### CAREFUL SELECTION PROCESS

SGS aims to secure long-term partnerships with suppliers and business partners that are built on mutual trust.

SGS selects suppliers and business partners based on shared corporate values and sustainability objectives. SGS supervises suppliers and business partners to ensure that business is conducted with integrity.

### PROCUREMENT OF GOODS AND SERVICES

SGS employees responsible for the purchase of goods and services from suppliers, or the selection of business partners must do so with the sole aim of securing the best overall value, with due regard to supplier or business partner quality and reputation.

SGS does not award contracts to suppliers or business partners based on personal preference.

Soliciting any form of advantage for oneself or any third party from a supplier, business partner or entity seeking to offer goods or services to SGS is strictly prohibited.

### APPROVAL PROCESS

The engagement of suppliers and business partners requires approval in accordance with the applicable SGS Group policies.



## CONFLICTS OF INTEREST

### GENERAL PRINCIPLES

A conflict of interest arises when an SGS employee's personal interests, or those of a close relative or a close friend, could interfere with the employee's judgment, objectivity, independence or loyalty to SGS.

A close relative of an SGS employee is defined as a spouse, child, grandchild, parent, grandparent, sibling, brother or sister-in-law, son or daughter-in-law, uncle, aunt, niece, nephew and any person living with the employee.

Employees must immediately declare in writing all such potential conflicts of interest to their managers and abstain from the decision-making process for as long they are affected by a potential conflict of interest.

### SPECIFIC REQUIREMENTS FOR CERTAIN SITUATIONS

Employees must consider specific requirements to avoid situations of, or the appearance of conflicts of interest. This includes strict prohibition in certain cases, or prior approval in accordance with the applicable SGS Group policies in other cases.

### SERVICE IMPARTIALITY

SGS employees are prohibited from any involvement in the provision of services to an existing or prospective SGS customer in which they or a close relative of theirs has a significant shareholding or other financial interests, or occupies a procurement, management or director position.

### PROCUREMENT OF GOODS AND SERVICES

Knowingly purchasing goods from or engaging the services of a supplier or business partner in which an SGS employee or a close relative of theirs,

has directly or indirectly, a significant shareholding or other financial interests is prohibited, unless the potential conflict has been declared to the affected employee's line manager and the affected employee does not participate in the procurement process.

SGS employees are prohibited from participating in the procurement process to select a supplier or business partner in which they or a close relative of theirs occupies a sales, management or director position.

### HIRING CLOSE RELATIVES

Hiring a close relative of an SGS employee requires prior approval in accordance with the applicable SGS Group policies. SGS employees are prohibited from participating in, supervising or having any influence on the hiring process of a close relative, as well as from supervising, managing or having any influence on the terms of employment, such as promotion or compensation of a close relative.

SGS employees may refer close relatives for open job positions at SGS but are prohibited from sharing any internal information with the candidates.

### DIRECTORSHIP OUTSIDE SGS

Serving on the board of directors of a company outside SGS, professional or trade association or any other entity requires prior approval in accordance with the applicable SGS Group policies.

### POLITICAL OFFICE

Assuming political office at any level requires prior approval in accordance with the applicable SGS Group policies.

### WORKING OUTSIDE SGS

Taking a second job or employment outside SGS, including self-employment and having a side business requires prior approval in accordance with the applicable SGS Group policies.

However, working for an SGS customer for whom the employee has performed services in the course of their SGS employment, working for an SGS supplier or business partner, working for an SGS competitor, competing with SGS and offering or participating in any form of professional or consultancy services to an SGS customer or prospective customer, are prohibited.

### OUTSIDE INVESTMENTS

Making a personal investment in an SGS customer, supplier, business partner or competitor unless by way of acquiring publicly traded shares on a stock exchange is prohibited.



## GIFTS, ENTERTAINMENT AND HOSPITALITY

### GENERAL PRINCIPLES

Any form of gift, entertainment or hospitality that could be damaging to the reputation of SGS or improperly influences or creates the appearance of an improper influence on business decisions must be avoided.

### NO GIFT POLICY FOR SGS EMPLOYEES

SGS employees are prohibited from accepting any type of gift, cash, tip or loan from existing or prospective customers, suppliers and business partners. The only exceptions are promotional branded items of nominal value such as calendars, pens and notepads, as well as perishable items such as food and drinks. Perishable items must be shared and distributed amongst the SGS affiliate employees in accordance with local policies. If the gift received cannot be returned without causing offence,

a suitable method of disposal should be chosen in accordance with local policies, for example, donation to a charity.

### ENTERTAINMENT AND HOSPITALITY OFFERED TO SGS EMPLOYEES

SGS employees are prohibited from accepting entertainment or hospitality when the offer is made in connection with services performed by SGS or is made by existing or prospective suppliers and business partners to SGS employees involved in the procurement process or the selection of suppliers or business partners.

SGS employees must disclose all entertainment and hospitality offered by existing or prospective customers, suppliers and business partners in advance and in accordance with the applicable SGS Group policies.

Should circumstances not allow for advance disclosure, this should be done immediately after the entertainment or hospitality is received.

### GIFTS AND HOSPITALITY OFFERED BY SGS TO THIRD PARTIES

SGS employees are prohibited from offering any type of gift, cash, tip or loan to third parties other than small promotional SGS branded items of nominal value such as calendars, pens and notepads, as well as perishable items such as food and drinks of a total value not exceeding CHF 100 per recipient and per calendar year. Any exception requires prior approval in accordance with the applicable SGS Group policies. Offering to pay for travel, accommodation or any hospitality for third parties, with the exception of business meals, requires prior approval in accordance with the applicable SGS Group policies.

## FAIR COMPETITION

SGS is committed to conducting business using competitive and fair market practices.

SGS employees are prohibited from participating, directly, or indirectly in any sort of collusion with third parties,

to improperly influence market conditions or to gain an unfair market advantage.

SGS employees must not engage in discussions with competitors regarding pricing, contractual terms, market allocations, division of territories or customers.

SGS does not market its services and capabilities in a deceptive or misleading way, nor does it make disparaging or untruthful allegations regarding competitors. SGS does not obtain confidential information on competitors by using illegal or unethical means.

## DONATIONS AND SPONSORSHIPS

### NO POLITICAL OR RELIGIOUS DONATIONS

SGS upholds a strict policy of neutrality in the political process of every country in which it operates. SGS neither supports nor contributes funds or resources, directly or indirectly, to any political party, elected official, candidate for public office, political campaigns or religious organizations.

### CHARITABLE DONATIONS AND SPONSORSHIPS

Donations by SGS to charitable organizations, direct contributions by SGS to not-for-profit community-based programs and sponsorships to promote SGS require prior approval in accordance with the applicable SGS Group policies.

Approval for charitable donations, direct contributions to not-for-profit programs and sponsorships is not given if they are intended or appear to influence third parties to grant improper advantages to oneself, SGS or other third parties.



# Protecting assets

## BUSINESS ASSETS AND RESOURCES

### SAFEGUARD COMPANY ASSETS AND FUNDS

SGS employees have a duty to safeguard SGS and third party assets, resources and funds, and must not use them improperly or for any form of personal benefit.

### USE OF IT RESOURCES

Company computers, network systems and electronic communication tools must be used solely for professional purposes, in accordance with the applicable SGS Group policies.

Use of e-mail, internet and other modes of electronic communication may be monitored and audited by SGS when suspicion of abuse arises.

### CONFIDENTIALITY

SGS respects and protects the confidential information provided by SGS employees, customers and third parties in the course of business and takes appropriate measures to prevent accidental disclosure.

No employee should seek access to confidential information, unless for a legitimate business purpose.

Employees must maintain the confidentiality of SGS information and not disclose or discuss any sensitive information regarding SGS, its business, financial performance, investments, strategies and customers. This obligation continues after the end of the employment relationship.

### INTELLECTUAL PROPERTY

SGS protects its own intellectual property and respects that of others.

Intellectual property that belongs to SGS can take many forms, including processes, designs, methods, operating procedures, commercial and marketing strategies, customer information, pricing and cost models.

Intellectual property that belongs to SGS plays a central part in generating a competitive advantage and must be protected from disclosure and misuse.

### PERSONAL SECURITY

SGS premises and facilities must provide a secure working environment for all SGS employees, visitors and other stakeholders.

Managers must take all reasonable steps to assess security risks and plan work accordingly.

## INTEGRITY OF BUSINESS RECORDS

### TRUE, ACCURATE AND COMPLETE RECORDS

SGS business and financial records, in both physical and digital form, must be complete, true, accurate and fair.

All information and transactions must be filed and archived in a timely manner, in accordance with applicable laws and SGS Group policies.

Some actions that SGS employees are prohibited from are:

- Falsifying or misrepresenting business or financial records
- Altering or destroying business records in breach of SGS Group policies, procedures or applicable law
- Misrepresenting or altering sales figures to meet goals or targets
- Submitting false or inflated expense claims related to travel or other expenses
- Submitting false or inflated work or overtime timesheets



## EXTERNAL COMMUNICATION

### COMPLETE AND ACCURATE INFORMATION

SGS is legally obliged to provide complete, accurate and transparent information regarding its business and activities to its shareholders and investors, the market and the community at large. Communications to shareholders, investors, the media and the public regarding SGS, its business and its financial performance, must only be made by authorized persons.

### INFORMATION DISCLOSURE

To protect the SGS brand and reputation, employees are required to adhere to the following standards:

- No employee shall speak on behalf of SGS, discuss or disclose any information regarding SGS to the media, financial analysts or current or potential investors, or issue any public statement on behalf of SGS unless authorized to do so
- Personal opinions with regards to religion, politics or any sensitive topics, cannot be expressed on SGS letterhead, e-mail or in any other context where such opinions or materials could appear to be attributable to SGS
- When participating in online discussion forums and social media, SGS employees must comply with the Code and applicable SGS Group policies



# Acting with respect

## LABOR RELATIONS

SGS is dedicated to creating a workplace that respects the human rights and employment rights of all its employees and upholds the labor regulations and laws of the countries in which it operates.

### FAIR LABOR

SGS does not use any form of labor that requires people to work against their will or deprives them of their dignity.

Child labor and forced labor are strictly prohibited at SGS. SGS does not utilize the services of suppliers or business partners who use child labor or forced labor.

SGS respects the minimum wage of the countries in which it operates and complies with all mandatory requirements determined by local legislation and binding collective bargaining agreements with regards to wages and their evolution.

### FREEDOM OF ASSOCIATION

SGS recognizes the right of its employees to form and join trade unions and bargain collectively.

In situations in which the right to freedom of association or collective bargaining is restricted under law, SGS facilitates parallel means of independent and free association and bargaining.

## BULLYING AND HARASSMENT

SGS employees must treat all individuals with respect.

Bullying, harassment or any form of abuse is strictly prohibited.

Bullying and harassment can occur as physical violence, sexual or psychological abuse.

SGS employees must never engage in acts or behavior that can cause another person to feel threatened or unsafe.

Sexual advances, requests for sexual favors, inappropriate physical contact and other verbal or physical harassment of a sexual nature or otherwise are not tolerated.

## NO DISCRIMINATION

SGS is committed to maintaining a diverse and inclusive workplace in which all employees are treated with dignity and respect. All SGS employees must be treated and evaluated solely on their job-related skills, qualifications, behavior and performance.

SGS bases all aspects of the employment relationship on the principle of equal opportunity, regardless of race, color, ethnicity, social status, sex, gender, sexual orientation, marital status, family status, age, disability, medical condition, religion, nationality, political affiliation or union membership.

Discrimination is not tolerated.

## DATA PRIVACY

### RESPECT PERSONAL DATA

SGS collects, manages and processes the personal data of SGS employees, customers and third parties with the utmost respect and care, and in accordance with the applicable SGS Group policies.

SGS ensures that data subjects are informed of their rights.

### PROTECT PERSONAL DATA

Personal data should only be accessed, processed, used and shared for legitimate legal and business purposes and with prior explicit consent from the data subject. Personal data must be retained only for as long as necessary and be stored and disposed of securely.



## HEALTH, SAFETY AND ENVIRONMENT

SGS is committed to fully protecting all SGS employees, visitors and other stakeholders, as well as physical assets and the environment from any work-related accident, exposure and damage of any kind.

### HEALTH AND SAFETY

To prevent the risk of injury and occupational illness, SGS employees are expected to comply with the following minimum requirements:

- Adhere to safe work practices and appropriate guidance to make conscious and responsible decisions that ensure health and safety

- Perform all work duties in a manner which ensures individual health and safety and that of all other people in the workplace
- Encourage fellow employees to create and maintain a safe and healthy work environment
- Report and record any work-related accident or pollution incident as required by SGS Group policies and relevant laws

No employee will be penalized for reporting an accident or a pollution incident.

### ENVIRONMENT

SGS employees are to contribute to promoting the protection and improvement of the environment by acting in an environmentally-friendly manner on SGS premises as well as those of SGS's customers and adhering to and fulfilling all applicable environmental legislation requirements.





# Complying with laws

## COMPLIANCE WITH LAWS

SGS complies with applicable laws of the countries in which it operates. Legislation covering various aspects of SGS's activities can be complex. Employees need to know the rules that apply to their daily work. Ignorance of the law is not an excuse.

When this Code or SGS Group policies impose more stringent standards than those mandated by applicable laws, employees must comply with the more stringent standards.

Employees must not attempt to conceal evidence, destroy documents, mislead or otherwise obstruct any legitimate investigation.

## ANTI-CORRUPTION

SGS does not engage in, tolerate or condone corruption of any form.

### ACTIVE CORRUPTION

SGS employees must not, directly or indirectly, pay, offer or promise a financial advantage or any other advantage, or engage in corrupt practices, with the purpose to:

- Influence the decision of a third party
- Secure business on behalf of SGS or a third party
- Secure an improper advantage or benefit for SGS, oneself or a third party

SGS employees are prohibited from making payments to government officials.

Facilitation payments are prohibited and demands by officials for facilitation payments must be refused.

### PASSIVE CORRUPTION

SGS employees must not, directly or indirectly, request, accept or agree to accept a financial advantage or any other advantage, or engage in corrupt practices, with the purpose to:

- Influence the decision of an SGS employee
- Encourage the SGS employee to secure an improper advantage or benefit for a third party
- Misrepresent findings or alter the results of inspections, certifications, audits or testing

### REPORTING CORRUPTION

Any SGS employee who receives a demand for a bribe, or is offered a bribe, in any form whatsoever, including cash, tips, loans, gifts, entertainment, hospitality, incentives, benefits, advantages, favors or is placed under acts of coercion, force or threats, must report the matter immediately to their line manager and through the SGS Integrity Helpline.

No SGS employee will be penalized for refusing to offer or accept a bribe, promise a favor, make a facilitation payment or engage in corrupt practices.

## INSIDER DEALING

Information is non-public if it has not been officially disclosed by SGS. Furthermore, SGS sometimes obtains important non-public information regarding customers or third parties.

Insider information typically includes non-public financial results, draft strategic plans, proposals for mergers and acquisitions, as well as planned changes in senior management.

In this respect:

- Employees must not pursue any personal investment or business opportunity on the basis of non-public information regarding SGS, its customers or third parties
- Employees are prohibited from trading in shares, options and other securities issued by SGS, its customers or third parties while in possession of non-public information
- Employees are prohibited from disclosing confidential information or providing investment tips to third parties on the basis of insider information

## SANCTIONS AND TRADE CONTROLS

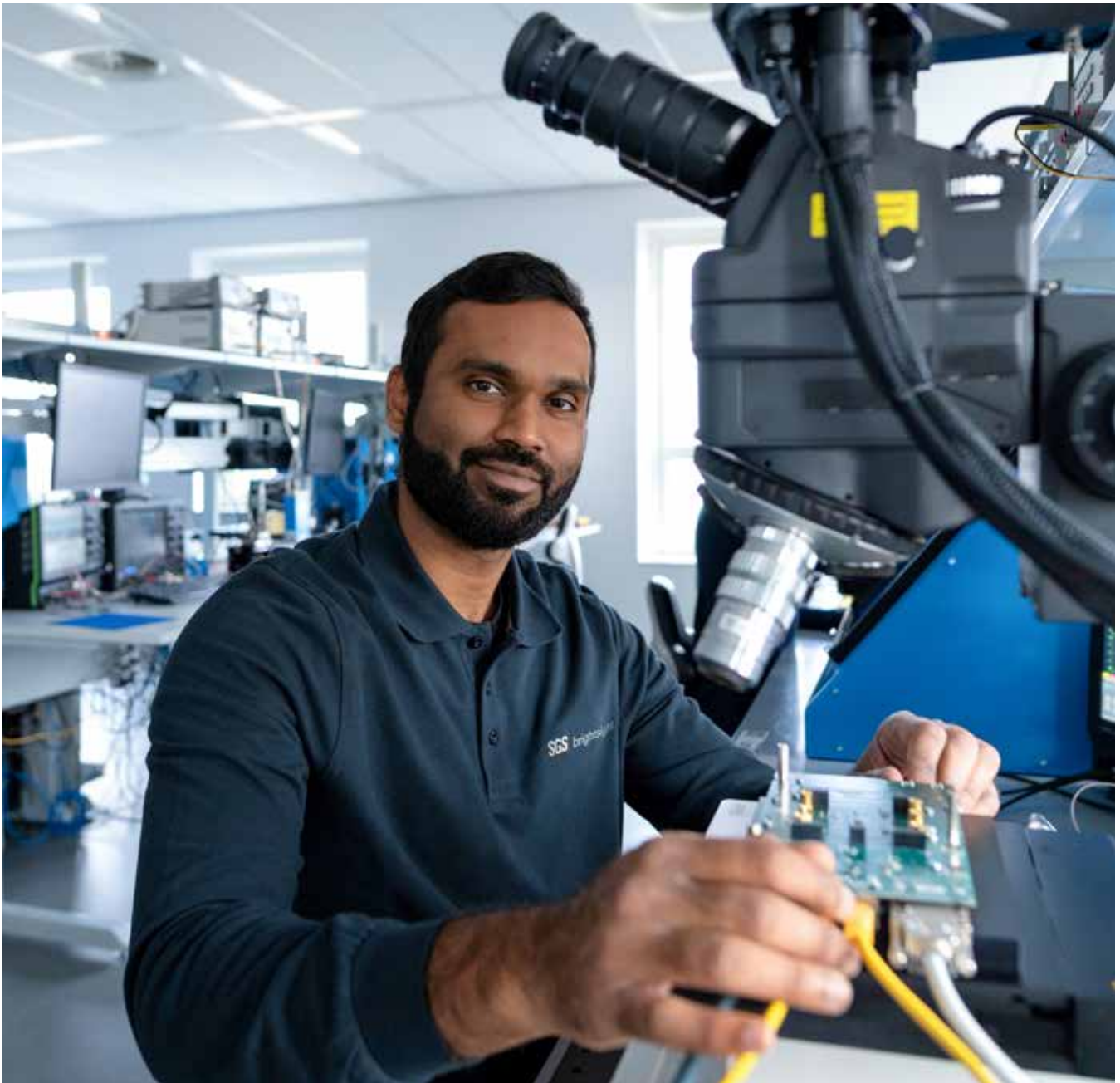
SGS complies with applicable laws in relation to sanctions and trade controls. In this respect:

- SGS employees are prohibited from conducting business with any third party or engaging in any business transactions subject to sanctions
- SGS employees must comply with applicable trade control restrictions
- SGS employees are prohibited from assisting any third party in evading applicable sanctions or trade controls

## MONEY LAUNDERING, AND CRIMINAL AND TERRORISM FINANCING

SGS is committed to combating money laundering and any attempt to facilitate the financing of terrorist or other criminal activities.

SGS employees are required to report any suspicion that a transaction or activity is being used as a means to launder money or finance terrorist or other criminal activities and seek guidance through the SGS Integrity Helpline.



**When you need to be sure**

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Switzerland

**sgs.com**

