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ICMQ INDIA

CODE OF ETHICS

OCTOBER 2011

Prepared by	ADM Preeti Pashte	Date 15/10/2011
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Verified by	MR Goplakrishnan	20/10/2011
Approved by	MD Cesare Saccani	25/10/2011

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	Code of ethics		
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Our Mission

To lead Indian companies and public bodies towards a worldwide recognized level of excellence in building materials, construction and infrastructure by:

- improving quality, durability, safety and environmental regulations
- improving buildings' quality, durability and performances
- improving construction sustainability
- enabling cooperation between Indian and Italian organizations
- creating value for our shareholders and partners

Our Vision

To be recognized as the best certification and inspection body in India in the fields of building materials, construction and infrastructure.


Additionally, to produce outstanding results through:

- a reputed brand
- an accredited and profitable set of certification, inspection and training services
- a talented team with deep knowledge in civil engineering
- a solid and shared knowledge base
- a qualified network of partners (national and international)
- an excellent management system
- an integrated network of excellent processes
- a continual services' improvement

Our Values

- Customer orientation:** we strive to respond to our customers and stakeholders, to increase their effectiveness through professional services and to excel at customer satisfaction
- Competence:** we provide customers with knowledge based services;
- Integrity and ethics:** we act in good faith, honesty and fairness and we deliver our services based on well established approaches, procedures and contracts ;
- Impartiality:** we ensure that conflict of interest do not exist or are resolved so as not to adversely influence activities;
- Openness:** we provide public access to appropriate and timely information about inspection and certification processes;
- Confidentiality:** we keep confidential any stakeholders' Confidential Information;
- Continual improvement:** we are committed to continually improve our processes effectiveness and efficiency;
- Social responsibility:** we respect people and do not discriminate. We also take care to health and safety, environmental impact and energy conservation.

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1 Introduction

The ICMQ India Code of Ethics states the fundamental principles and provides instruction on how we work together to develop and deliver services, how we protect the company reputation and value and how we interact with our Stakeholders and our responsibility towards them.

ICMQ India Stakeholders are:

- a) Customers
- b) Investors and Insurance companies (providing capitals to our customers).
- c) Employees
- d) Suppliers & Business Partners
- e) Public Bodies and community

The compliance with this Code shall enable us in enhancing the image of correctness, prestige and good reputation which is a fundamental asset of ICMQ.

The ICMQ India Code of Ethics is organized in three sections:

1. **Principles:** they reflect our values and determine, in an abstract manner, the reference values for governing relations with stakeholders and assessing our activities
2. **Criteria of conduct:** they set out guidelines to interpret and apply the Principles and to identify the behaviour that we might encounter in relations with each category of stakeholder. Additionally they define what we consider acceptable conduct to prevent unethical behaviour;
3. **Implementation procedures:** they establish the activities to be carried out to implement and ensure the observance and continuous improvement of the Code of Ethics.

Our values and Code of Ethics will conduct and influence our course of action whenever laws or regulations do not clearly state what we should do.

This Code of Ethics must be known and abide by:

- a) all employees. The term "Employees" refers to both male and female full time and part time employees, managers, senior managers, Statutory Auditors and Board Members.
- b) Individuals linked with ICMQ India by way of contractual relations of any type including occasional and/or solely temporary contracts in all their dealing with or on behalf of ICMQ India. This category includes, but is not limited to, inspectors, auditors, faculties, subcontractors, business partners, intermediaries and agents).

ICMQ India further requires that all businesses which are affiliated or in which it holds an interests as well it main suppliers and partners conduct themselves in compliance with the general principles of the present Code.

Compliance with this Code of Ethics shall be included in the performance evaluation of each employee.


No deviation can or will be tolerated.

Any employee who fails to comply with this Code of Ethics is aware and accepts to be subject to disciplinary measures and sanctions which may include the termination of his relationship with ICMQ India and eventual legal actions taken by the ICMQ India resulting in financial or other penalties.

The author of any violation shall in any case have the right to be heard and to defend itself before a disciplinary measure is imposed.

For any questions or worries regarding implementation or interpretation of the Code of Ethics any employee may ask to the Compliance Officer for clarification.

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2 General Principles

2.1 Compliance with law

ICMQ India is fully committed to comply with provisions and laws in force in the country where we operate, the Code of Ethics, internal requirements (such as procedures and instructions under accreditation), guidelines principles and business regulations.

Applicable laws, regulations and requirements within our area of activity must be known to ensure the compliance with these requirements and to require the legal assistance which may be needed.

Any irregularity or unscrupulous behaviour may compromise the Company image and reputation, as well as the Company functions and assets.

ICMQ India does not admit activities which could infringe law and regulations or could manipulate legal or other regulations.

2.2 Responsibility and integrity of services

ICMQ India believes that excellence can be achieved by managing a set of interdependent and interrelated systems, processes and facts.

Company processes are established and deployed in compliance with international standards and, where applicable, our services are provided under accreditation.

Services must be provided in a highly professional, independent and impartial manner.

All decisions are based on objective evidences and facts and any certification is granted if there is sufficient evidence of conformity, otherwise certification will not be granted.

ICMQ India is committed to meet and exceed all Company external requirements and to inspire and maintain high levels of confidence and trust with stakeholders.

2.3 Impartiality

Impartiality is a fundamental requirement for any certification, inspection and training body to deliver certificates and reports that provide confidence and trust.

An **Impartiality Policy** is established and must be deployed achieving the purpose of mitigating risks that could compromise impartiality of certification, inspection and training processes.

A Committee for Safeguarding Impartiality is established to identify any conflict of interest that may arise as a result of activities carried out and to assure a continual monitoring on impartiality carried out by the Management.

2.4 Independence and Conflict of interest


Independence is a pillar of an excellent certification and inspection body.

ICMQ India avoids any conflict of interest with any interested party.

A conflict of interest is a situation where the interests of ICMQ differ from your own personal interests or those of your close family or of persons with whom you are involved in a personal business contact or relationship.

ICMQ India provides certification and inspection services by ensuring that any relationship with a consultancy organisation does not pose an unacceptable threat to its impartiality.

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A relationship that threatens ICMQ India impartiality may depend on ownership, governance, management, personnel, shared resources, finances, contracts, marketing and payment of sale commissions or other inducement for the referral of a new client.

These situations can influence our judgment, even if we are unaware of this, and may create the perception of lack of impartiality.

2.5 Competence based “Talented Team”

ICMQ India believes that excellence can be achieved by maximizing our intellectual capital and deploys approaches to recruit and develop people to match the competencies needed in order to implement the company policies, strategies, objectives and plans.

ICMQ India is fully committed to realize and unlock our potential.

The competitive scenario in which we perform may ask to meet and adapt to the changes required both in terms of operational changes and in terms of capabilities.

Company values and loyalty to organization must be ensured to create a culture based on trust, openness and empowerment.

2.6 Confidentiality

ICMQ India ensures and safeguards confidentiality of any Confidential Information related to itself and its Stakeholders.

The term “Confidential Information” means any information disclosed by ICMQ or its Stakeholders (the Disclosing Party) which there is an interest to keep confidential and which is not available to the general public or are obtained by a Recipient party or to which a Recipient is allowed access without the Disclosing party prior written approval to be disclosed to any third party other than ICMQ India officers and employees directly involved with the assignment or relationship with Stakeholders (e.g. a customer during a certification/inspection activity).

Regardless of how it is saved (paper, data storage devices, etc.) Confidential Information include, but are not limited to, investments and business plans, financial data and forecast, marketing and sale plans, databases, pricing strategies, intellectual properties (patents, trade secrets, etc.), employee information, manuals and working procedures, technical specification, drawing or designs regarding customers, partners, staff or our own business interest and are considered confidential unless otherwise specified or published by an authorized body.

ICMQ India established a **Confidentiality Policy** to safeguard confidential information.


2.7 Integrity of financial and company records

ICMQ India believes that excellence is achieving results delighting shareholders and stakeholders.

Shareholders must receive all the relevant information available.

ICMQ India creates such conditions as to facilitate the widespread and conscious participation of shareholders in the decisions that concern them, ensures parity of information and, finally, protects the interests of ICMQ and of the body of shareholders against initiatives that are not based on the principles of transparency and correctness.

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2.8 Integrity of the individual

ICMQ India guarantees the physical and psychological integrity of its employees and respects the personal dignity, private life and personal rights of each individual.

Discrimination based on race, gender, age, nationality, political opinions or religious beliefs, sexual preferences and disability are not tolerated.

Any threat with the use of intimidation, violence or physical punishment is strictly forbidden.

People must also be open, transparent and truthful in dealing with our colleagues, subordinates or superiors.

2.9 Fair competition

ICMQ India considers customers as the key to success and treats them fairly and according to the highest professional standard.

ICMQ India believes in the benefits of a free market economy.

Financial and commercial targets must be achieved in a fair and legal manner.

ICMQ India never engages in any practice aiming to achieve commercial advantages through illegal or unethical practices. In particular ICMQ India does not take part in discussion or enter into agreements with competitors on prices and market allocations.

ICMQ India encourages transparency when drafting commercial documents and promotes the company's strengths rather than highlighting the shortcomings or failings of our competitors.

We do not intentionally denigrate or libel our competitors when discussing with clients, nor commit ourselves to providing a service which we are unable to supply without a suitable contract review.

2.10 Responsiveness to complaints and appeals

ICMQ India believes that excellence must be achieved by creating sustainable customer value.

Experiences and perceptions of customers are monitored and reviewed. Where things go wrong ICMQ India responds quickly and effectively.

ICMQ India is fully committed to build and maintain excellent relationships with all our customers.

Policies and procedures have been established and implemented for complaints, appeals and disputes received from stakeholders about the provision of services or any other related matters.

2.11 Social responsibility


ICMQ India believes that excellence is exceeding the minimum regulatory framework in which performs and it strives to understand and responds to the expectation of our stakeholders.

ICMQ India gives consideration to, and actively promotes, social responsibility and ecological sustainability both now and for the future through our influence capability.

ICMQ India is actively committed to protect the environment and to minimize resources consumption such as energy and water through policies, guidelines and actions.

ICMQ India encourages all to improve the awareness of the environmental effects of their activities and to consider the consequences of their actions on humans, the environment and society.

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2.12 No corruption


Corruption is considered a criminal offence that may threaten our reputation and independence.

ICMQ India complies with relevant local and international anti-bribery laws in all countries within which we perform services.

No bribery and persuasion payments are permitted.

No money or other benefits for themselves or for third parties may be promised or paid to authorities or their representatives for any kind of services or duties performed. This does not include the payment of officially imposed fee which must be made public.

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3 CRITERIA OF CONDUCT

3.1 Relation with Shareholders

3.1.1 Financial information and records

All transactions must be duly and correctly recorded in the Company's books and entries must be justified by appropriate documentation issued by the parties.

All documents (business and financial reports, forecasts, legal reports, tax returns and also documents submitted to governmental or regulatory authorities file and records) must be identified and maintained in a correct and official manner and must contain accurate, true, reliable and authorized information. Such information should, in no case, be subject of fraudulent treatment. This applies in particular to balance sheets or other files which are part of or related to accounting.

All documents must be stored in accordance with the applicable laws and Group policies.

Internal control of financial and accounting information must ensure the quality and reliability of the information supplied.

Each employee is personally responsible for the information he provides and the documents he issues and delivers. All employees must ensure that reports prepared and/or communicated contain reliable, truthful and complete information.

All official external communications must be checked and counter-signed by a person who has not involved in drafting it.

ICMQ appointed a statutory auditor of the balance sheet and the financial statements in full transparency and with utmost observance of laws and regulations currently in force.

3.2 Relation with other parties

3.2.1 Information processing and disclosure

We accept to comply with the ICMQ India Confidentiality Policy.

We understand that ICMQ India and/or a third party (the "Disclosing Party") at any time before, during or after the validity of our contractual period and according to arrangements previously made between them, disclose or may disclose Confidential Information relating to the Disclosing Party's business.

We understand and accept the meaning of the term Confidential Information as specified in the ICMQ India Confidentiality Policy and in this Code (Clause 2.6)


We are aware and undertake that every contract signed between ICMQ India and a third party includes a clause aiming to protect Confidential Information.

Consequently we accept to treat and maintain confidential such Confidential Information within the agreed scope and we undertake that the use of Confidential Information is restricted to permitted professional purposes and shall be shared with or given to the authorized persons only.

We undertake:

- (i) to hold the Disclosing Party's Confidential Information in confidence and to take reasonable precautions to protect such Confidential Information;
- (ii) not to disclose any Confidential Information or information derived there from to any third party;

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- (iii) not to make any use whatsoever at any time of such Confidential Information for any purpose other than the ones established by each contract and in connection with the obligations specified in it;
- (iv) not to copy any such Confidential Information
- (v) not to export or re-export (within the meaning of Indian export control laws or regulations) any such Confidential Information or product thereof.

Confidential Information cannot be disclosed to third parties without prior written authorization of the interested party and subsequent management authorization. We do not use them for personal benefit.

We accept to return to ICMQ all Confidential Information received by you without making or retaining any copies thereof and to destroy all other written (including electronically stored) Confidential Information addressing without delay, a letter to ICMQ certifying that you have done so.

We protect our Confidential Information from access by third parties or colleagues who are not involved through suitable security measures. We store documents in designated secure areas and we dispose them in a secured manner.

Any attempt by unauthorized individuals to access confidential data constitutes a breach of this Code of Ethics and must be reported immediately to the Management.

We accept to remain bound by this Confidentiality Obligation after terminating the employment or professional agreement with ICMQ.

We acknowledge and agree that due to the unique nature of the Disclosing Party's Confidential Information, there can be no adequate remedy at law for any breach of obligations hereunder, which breach may result in irreparable harm to the Disclosing Party, and therefore, that upon any such breach or any threat thereof, the Disclosing Party shall be entitled to appropriate equitable relief in addition to whatever remedies it might have at law.

3.2.2 Relations with Stakeholders

We strive to establish stable communication channels with Associations representing our stakeholders for the purpose of cooperating, in accordance with the reciprocal interests.

We incorporated an Advisory Council with the purpose of involving our most authoritative and representative associations of stakeholders regarding specific topics being careful to avoid any conflict of interest.

3.2.3 Improper advantages (Gifts, free articles and benefits)


We do not neither grant nor accept improper advantages, whether directly or indirectly in the course of carrying out our professional duties.

We do not deal with third parties (agents, intermediaries, consultants, contractors) if we know or have reasons to believe that they engage in granting improper advantages.

We categorically reject all forms of bribe, gift, excessive entertainment including kickbacks the use of funds or assets for any unethical purposes and the use of other routes or channels for provision of improper benefit from or to customers, agents, contractors, suppliers and governmental officials.

We accept to comply with laws and local customs establishing limits for gifts and invitations to lunch and dinner.

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Gifts, hospitality and entertainment must always be related to a genuine business purpose and must not be intended to influence decision or be construed as doing so. They must be kept within what is socially acceptable and legally permissible.

3.2.4 External Communications

We provide information to our Stakeholders in compliance with laws and in a truthful, fair, transparent and timely manner. We do not make untrue or misleading statements for promotional purposes and we ensure that information supplied is accurate and unequivocal.

In drawing up our own documents, we use clear, objective and complete language, agreeing to any controls by fellow workers, superiors or outside parties authorized to make such requests.

We avoid all forms of pressure on the mass media or attempts to obtain favours from same.

We publish all press releases at www.icmq.in.

3.3 Relation with customers

3.3.1 Impartiality

We accept to comply with the ICMQ India Impartiality Policy

We avoid any situation in which our independence or impartiality may be compromised. If such situation happens we examine and deal openly and transparently.

We do not accept any pressure from clients aiming at obtaining a favorable treatment.

We do not damage impartiality and integrity from any improper advantages granted to influence decisions or actions in violation of duties.

We undertake to disclose any personal or business relationships with organizations to be certified or inspected.

In particular, before being appointed to conduct any certification or inspection activity in the role of Auditor or Inspector, we undertake to declare ICMQ India management that:


- b) there is not any impeding fact or condition that might hinder the exercise of the appointed task;
- c) there has not been any business relation with the customer to be certified or inspected in the last 3 years and any such relation will not be accepted for 2 years after an audit or inspection project completion;
- d) there is not any conflict of interest that could jeopardize audit/inspection activities execution;
- e) any commercial, financial or other pressures able to compromise impartiality during certification/inspection activity shall not be allowed;
- f) in case we have been employed by a consulting firm our company did not provide any consultancy service to the ICMQ India customer in the previous three years.

Every year we undertake, in our role of ICMQ India qualified auditors/inspectors, to deliver the ICMQ India management with an updated CV's copy specifying the list of organizations in which we provided professional services. We are aware and accept that such information shall be used by ICMQ India to update the auditors'/inspectors' register and to enable ICMQ India management to prevent any conflict of interest with organizations to be audited/inspected.

3.3.2 Confidentiality

See Clause 3.2.1.

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3.3.3 Contract and communications to customers

Contracts and communications to Customers (including advertising messages) must be:

- clear and formulated in a language as similar as possible to that normally used by the parties;
- drawn up in accordance with the rules and regulations currently in force;
- complete, so as to avoid neglecting any item of relevance to the customer's decision;
- available on the ICMQ internet WEB sites or upon customers' request.

We also provide customers with timely information regarding contract modifications.

3.3.4 Conduct of employees

We deal with customers by combining competence with respect and courtesy, all within a relationship of respect and professionalism.

We undertake to limit the formalities which our customers are required to fulfill according to requirements included in those standards we are complying with.

3.3.5 Delivery of services

We undertake to act honestly, in good faith and in compliance with ICMQ approved policies, approaches and procedures.

We grant reports and certificates based on documented data, findings and test results only reflecting documented observations and facts and reported in good faith and in accordance with the current technical and professional standards.

We pay particular attention to the preparation, legibility, confidentiality, integrity and availability of our reports. Improper changes not based on facts and results are prohibited.

Customers have the right to receive any necessary information and a detailed explanation of how a result was reached.

When approved test methods make provision for tolerance in results, such tolerance shall not be abused by us to alter the main direction or tendency of the actual test findings.

Deliberately incorrect or misleading information or entries in documents, results, reports and certificates are prohibited.

We are forbidden to offer services without payment of guarantee a certain outcome.

3.3.6 Quality control and customer satisfaction

We undertake to guarantee adequate standards of quality for the services provided and we periodically monitor the results through:

- a) "direct measures": used to monitor, understand, predict and improve the performance of the organisation and to predict their impact on the perceptions our Stakeholders
- b) "perception measures": obtained from external sources giving an understanding of the effectiveness, from the stakeholder's perspective, of the execution of our services.

We promptly reply to eventual complaints, appeals and disputes received from stakeholders regarding the service provision or any other related matters.


3.3.7 Involvement of customers

We undertake to respond at all times to suggestions and complaints made by customers or consumer associations by means of appropriate and rapid systems of communications.

We keep our customers informed about our activities and services.

To the extent possible, we undertake to involve customers as well other stakeholders associations on projects that will have a significant effect on customers.

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3.4 Relation with employees

3.4.1 Recruitment

We hire people on the basis of the degree to which their profile matches the skills, competences and experience sought and in compliance with the principle of equal opportunity.

We require information strictly related to verification of possession of the professional and psychological characteristic being sought, with the utmost respect for the candidate's private sphere and opinions.

Within the limits of the available information, we avoid instances of favouritism, nepotism or cronyism during the selection and hiring phases.

We take decision based on whether the required job profile corresponds to the employee's characteristics (in the case of promotion or transfer, for example) and/or on considerations of merit (for example, the awarding of incentives on the basis of the results achieved).

3.4.2 Establishment of employment relationship

We hire personnel with regular employment contract. No form of irregular employment is tolerated.

At the time of the employment relationship is established, each candidate receives accurate information regarding:

- the characteristic of the function and the tasks to be performed;
- salary package
- rules of employment

This information is presented to the candidate in such a way that acceptance of the job is based on an effective understanding thereof.

3.4.3 Human resource management

Access to roles and positions is determined by considering expertise, ability and behaviour.

Evaluations of employees include criteria based on achieved performances, behaviour, attitude to improve and evaluation provided by individuals who dealt with the person being evaluated.

Managers have the duty of deploying professional skills by using all available means to foster the development and growth of their employees (for example, job rotation, mentoring by expert personnel and the handling of positions leading to greater responsibility).

Managers have the duty of communicating all the strengths and weaknesses of the employees in order for the latter to be able to improve their skills through focused training.

Training is assigned to groups and individual employees on the basis of their specific needs.

The training history of each employee is recorded.

Requests for services, personal favours or any other forms of conduct that breach this Code of Ethics, but which are presented as if they were acts that must be carried out for a superior, constitute an abuse of a position of authority.


Employees are encouraged to be involved in the performance of their work in various ways and in suggesting improvement ideas. Managers shall take decision by listening to various points of view.

In any event, we must always play a role in the implementation of the planned activities.

3.4.4 Health and safety

We are committed to protect employees by standards relating to health, safety and to provide fair and respectable working conditions and to disseminate and reinforce a culture of safety.

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We work to preserve, mainly through preventive actions, the health and safety of colleagues, as well as the interests of other stakeholders.

We are involved in conducting a continuous analysis of risks and resources to be protected, to use the suitable safety equipments and to organize training initiatives.

3.4.5 Safeguarding of privacy

We safeguard the employees' privacy through the use of standards that specify the information that ICMQ require from them, together with procedures under which such information is processed and preserved.

The above standards also prohibit the communication or disclosure of personal data without the prior consent of the interested party, except in the cases provided for under law.

3.4.6 Integrity and defense of individual

We never engage any act of psychological violence and any behaviour that may result in discrimination or injury of the individual or of his convictions or preferences.

If we believe that we have been subjected to harassment or discrimination for reasons tied to age, gender, sexual preferences, race, state of health, nationality, political opinions and religious beliefs etc. we may report the fact to the company, which shall evaluate whether a violation of the Code of Ethics has occurred. Disparities that have been justified, or are subject to justification, under objective criteria are not, however, considered instances of discrimination.

3.4.7 Duties of employees

We act in good faith to meet the obligations undertaken when signing our contract of employment, as well as the provisions of the Code of Ethics, fulfilling the tasks requested.

We report through the appropriate channels any violations of the rules of conduct established in internal procedures.

We enforce the Confidentiality Policy and all related procedures.

We avoid situations which can lead to conflicts of interest and to refrain from personally taking advantage of business opportunities that they may learn of when performing their functions.


Examples of conflict of interest which must be avoided include, but are not limited to:

- a) *providing any professional service to a customer in which ICMQ has a direct or indirect interest*
- b) *providing services to a customer in which ICMQ has a direct or indirect interest with a close relative or an organization with which you or one of your close relatives is associated;*
- c) *accepting appointments outside ICMQ without first having obtained approval;*
- d) *offering a job to a family member without first having obtained clearance;*
- e) *taking any personal advantage of a business opportunity for ICMQ or using company property or resources for personal purposes;*
- f) *acquiring directly or through relatives, friends and intermediaries an interest in a competitor, supplier or client that could result into a loss of independence;*
- g) *soliciting or accepting directly or indirectly a personal gain granted to you as an ICMQ employee, except for socially acceptable gifts and hospitality;*
- h) *issuing evaluations, tests or certifications which are breaching the prevailing regulations;*

In case of doubt, we accept to stop and to report all potential personal conflict of interest for evaluation to our direct Manager who, in accordance with the appropriate procedures, shall inform the Ethics Officer which will examine each individual case to evaluate whether there is a conflict.

We accept to supply information regarding the activities performed outside of working hours in the event that the latter may appear to create a conflict of interest with ICMQ.

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We make every effort to safeguard corporate assets and assigned resources by acting responsibly and in compliance with the procedure established to govern use, which must be documented.

In particular we must:

- use the assets assigned in a careful and efficient manner
- avoid improper uses of corporate assets that might damage or reduce their efficiency
- report immediately any threats or events that might prove damaging to ICMQ and to notify the units in charge of such matters.

ICMQ reserves the right to prevent distorted used of its own assets and infrastructure through suitable approaches and methods.

3.5 Relation with Suppliers and Business Partners

3.5.1 Selection of suppliers

Purchasing processes are designed to obtain the maximum competitive advantage for ICMQ while granting equal opportunities to all suppliers. They are also based on pre-contractual and contractual conduct based on essential and reciprocal elements of good faith, transparency and collaboration.

At any rate, if in the performance of its activities on behalf of ICMQ a supplier should act in a manner that is inconsistent with the general principles of the present Code of Ethics, ICMQ may take all appropriate action, including terminating the contract and refusing to work with such supplier in the future.

3.5.2 Integrity and independence in relations

We manage relations with suppliers maintaining integrity and independence in relations.

For example we:

- do not convince a supplier to enter into a disadvantageous contract by holding out the possibility of a more advantageous contract in the future;
- do not establish binding, short-term contracts that require continuous renewals involving price revisions as are consulting contracts that do not include an adequate transfer of know-how etc;
- avoid to draw up contracts whose estimated value is particularly significant in relation to the supplier's business volume.
- guarantee the utmost transparency and efficiency in the purchasing process
- separate the roles between the unit requesting the supply and the unit signing the contract;
- track the decisions made;
- keep of information, together with official tender and contractual documents, for the periods established under the regulations currently in force and referred to in the internal purchasing procedures.


3.5.3 Behaviour in procurement

We undertake to introduce, for certain supplies, corporate prerequisites (for example the presence of an environmental management system) as well as observance of health and safety rules.

We seek to ensure that improper payments are not being channeled through intermediaries, agents and subcontractors.

We monitor the suppliers' selection and the ethical behaviour of some of our business partners (intermediaries, joint venture partners, subcontractors, agents, main suppliers and contractors).

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	Document		SD 03 Rev 02
	Code of ethics		
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We avoid, unless admitted by Company policies, cash payments to prevent any misuse of funds all payments for goods or services.

Clearance must be obtained for the remuneration of agents, intermediaries and consultants.

3.6 Relation with Public Bodies and communities

3.6.1 Economic relations with political parties, unions and associations

Political contributions are forbidden unless they are disclosed, comply with local law and have obtained prior clearance.

3.6.2 Institutional relations

We establish and manage stable channels of communication with all institutional bodies at international, national and local level.


We establish and manage stable communication with Accreditation Bodies through representatives who have been explicitly designated to perform such roles by the top Management.

3.6.3 Contributions and sponsorships

Corporate donation, sponsorship and involvement in charity events are only permitted within the current legal framework and according to the following requirements:

- a) the organization or project must be considered being beneficent and charitable;
- b) donation receipts should be requested whenever possible;
- c) prior clearance must be obtained by the top management.

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	Document		SD 03 Rev 02
	Code of ethics		
	Controlled Version	Property of ICMQ India	

4 Implementation

4.1 Duties of the Ethics Committee

An Ethics Committee has been appointed by the Board of Director with the responsibility for the program relating to ethics and, in particular, for the following tasks covered by the Code of Ethic:

- making decisions on serious violations of the code reported by the Compliance Officer;
- expressing binding opinions on the auditing of the most significant policies and procedures, so as to guarantee that they prove consistent with the Code of Ethics;
- periodic review the Code of Ethics.

To this end, the Ethics Committee evaluates:

- the plans for communications and training in ethics;
- the Ethics Report;
- the audit plan and periodic reports drawn up by the Compliance Officer.

The Managing Director, the Head of Certification Body, the Head of the Inspection Body, the Business Line Managers and Branch Managers must ensure that all employees are familiar with the current version of the Code of Ethics.

4.2 Duties of the Compliance Officer

The Compliance Officer of ICMQ India shall:

- ensure that the Code of Ethics is delivered to all employees and interested parties
- confirm that the Code of Ethics is applied and respected through specific activities that aim to oversee and promote ongoing improvement in the area of ethics within ICMQ India by means of an analysis and evaluation of the processes designed to control ethical risks;
- provide employees with clarification about the compliance with this Code;
- monitor initiatives meant to increase awareness and understanding of the Code of Ethics, in particular guaranteeing the development of communications and ethical training and analysing proposals for the revision of corporate procedures and policies with a significant impact on corporate ethics, together with the formulation of possible solutions to be submitted for evaluation by the Ethics Committee;
- receive and analyzing reports of violations of the Code of Ethics;
- supports the Management Representative in handling appeals and complaints
- verify that the Ethics Report is complete and reliable;
- propose modification of this Code to the Ethics Committee.

These activities shall be performed strictly in cooperation with the Compliance Officer of the mother company and with unrestricted access to all documentation held to be useful.


4.3 Communication and Training

All employees may approach the Ethics Committee with any questions or information and shall have the opportunity to provide input on the development of the Code of Ethics.

4.4 Violations

Should any suspected deviation from this code be observed your manager or the Managing Director must be promptly informed.

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	Code of ethics		
	Controlled Version	Property of ICMQ India	

Any request for, or offer of, an improper payment or advantage coming to our knowledge shall be reported.

Such information will be treated as strictly confidential and will be used to address further evidences collection and to implement the appropriate corrective measures. Identity will be kept confidential.

No sanctions shall be inflicted upon an employee who has reported a breach in a proper and justified manner and in good faith.

If an employee takes part in a prohibited activity he may be subject to the resulting disciplinary measures even if you he is the one reporting it.

All employees, customers, partners and representative bodies have the right to register complaints with the Ethics Committee. These persons must process the complaint and inform the person who made it about the corrective actions to be planned and implemented. A complaints record is established and related statistics are made available.

The Ethics Committee will investigate cases and follow them through. In case of need the Ethics Committee will decide on how to proceed.

4.5 Appeal

Any Stakeholder (individually or collectively) can file appeal against a decision taken by ICMQ and retains the right of requesting the entire procedure for appeals to ICMQ that cannot refuse to disclose.

In the event the appeal is made orally, the Appellant is requested to formalise it in writing.

4.5.1 Receipt of appeal

The appeal should be sent to:

- a) **Head of Certification Body (HCB)** for any issues related to management system certification
- b) **Head of Inspection Body (HIB)** for any issue related to third party inspection activity
- c) **Head of Training** for any issue related to training activity.
- d) **Head of Product Certification** for any issues related to product certification

The appeal is examined by ICMQ personnel (including Auditors and Inspectors) who have the duty of identifying, as a preliminary measure, which actions are required and to submit them for further processing the appeal.

The file, complete with the opinion of all relevant people, must be ready within 1 month of receiving the appeal.

The Management Representative makes sure that any submission, investigation and decision on appeals shall not result in any discriminatory actions against the appellant.

4.5.2 Examination of the Appeal


Appeals must be notified to all the Committee for Safeguarding the Impartiality members by sending in all the collected documents vide email for their feedback.

Feedbacks from each member is again compiled and resent to CSI members again in order to have a good and fair decision on the said appeal.

If the Committee judges that are not available the elements required for taking a decision it may require more detailed information regarding the complaint, which is given by the BLM/Heads

The Committee for Safeguarding Impartiality, during meetings shall analyse the effectiveness of actions taken by ICMQ

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	Document Code of ethics		SD 03 Rev 02
	Controlled Version	Property of ICMQ India	

4.5.3 Decision

A decision regarding the appeal must be taken within 45 days from the date of receiving the appeal.

If the appeal is approved, the resulting measure must be used as a basis for appropriate corrective and/or preventive actions relating to ICMQ's operating method.

4.5.4 Reply to the Company

The Management Representative must ensure that a prompt reply is initially sent to the appellant regarding receipt of the appeal and also briefly describing the process time that would be taken to come to a conclusion.

Periodically also, when required, the Head will update the appellant about the outcome of their appeal. After a decision is made, the Head would send the reply to the Company before the end of the second month after receiving the appeal and formally closing the process.

4.6 Complaints

Any Stakeholder (individually or collectively) can make a complaint regarding the activity performed by ICMQ and retains the right of requesting the entire procedure for complaint to ICMQ that cannot refuse to disclose.

In the event the appeal is made orally, the Appellant is requested to formalise it in writing.

4.6.1 Complaint receipt

Complaint can be made by any person or body against the certification body and its procedures for e.g.: against certificate issue, refusal, suspension, or withdrawal or should the service be faulty, below customer expectations, incomplete or deviate in any way from the contract, conduct of the auditor/inspector/trainer etc.

The complaint must be made in writing to ICMQ. Any ICMQ employee receiving a complaint will promptly notify, by mail, the complaint to the Management Representative.

The ICMQ personnel review the complaint and, in case the complaint is not resolved satisfactorily at the branch level, the relevant manager strives to reach an amicable settlement.

Should this fail, the complaint, together with records of preceding reconciliation attempts will be opened and processed according with this procedure.

If the complaint is rejected the Management Representative send to the claimant a written communication explaining the reason of the rejection.

4.6.2 Complaint examination


In case of written complaint the process starts with the complaint form; if the complaint is verbal the Management Representative opens the process by filing the Internal Non Conformity form (Form 06).

The examination process of complaint concerning a certification starts with a written communication to the interested organization by the complainer.

The Management Representative creates a folder in which collects all the documentation related to the complaint and, if necessary, informs the interested Auditor/inspector/trainer requesting for a written opinion.

Any complaint notified by complainer will be processed as follow.

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- 1) a special visit would be executed in the organization premises or site, depending on the criticality of the complaint, by Auditor/inspector who will have the task of preparing a report showing his evidences and including the opinion of the Organization to be undersigned and his opinion.
- 2) a meeting with the Organization representatives;
- 3) both.

The complaint notified by a third party will be processed individually depending on the situation.

If the preliminary analysis conducts to the complaint resolution the Management Representative, after the Managing Director approval, plans and deploys the eventual corrective actions related with the ICMQ activities or requires the corrective action to the organization.

The Preliminary analysis closure must be remarked in written.

If the Preliminary Analysis does not address any resolution of the complaint, then the Management Representative notifies the file to the Committee for Safeguarding Impartiality suggesting the proposals.

In any case the preliminary analysis and the following corrective actions must be closed within one (1) month from the complaint receipt.

The complaint is notified to the Committee for Safeguarding the Impartiality only for the most relevant aspects of the certification process who has to examine the complaint in the first meeting following the communication.

If the Committee understands that there are not many elements required for taking a decision it may require more detailed information regarding the complaint, which is promptly given by the Business line manager

The Committee for Safeguarding the Impartiality, during the meeting or in the following meeting after more detailed information collection must decide if accepting or not the complaint and will prepare the notification to the claimant organization.

The communication will be notified to the organization by the Business Line Manager.

4.6.3 Answer to complainant

The Management Representative will monitor the process and will put in condition the Managing Director to notify the complainant with the final decision within 1 month from the process conclusion.

4.6.4 Disputes


ICMQ may receive disputes concerning the services in cases where:

- a) Certified clients or under inspection process
 - regarding fees,
 - services as promised but not delivered,
 - client does not follow the contractual obligation mentioned in DOC 101 especially the use of logo and ICMQ certificate
- b) stakeholders like, Regulatory bodies, clients' customers, accreditation Bodies
- c) other interested parties pertinent to above points

Standard practices of handling disputes are followed. If there is any requirement for appointing an arbitrator by either party, then this is accomplished as per the statutory requirements.

All the legal proceedings, if escalated, shall be within the jurisdiction of Mumbai court.

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4.7 Reports

The Compliance Officer of ICMQ India prepares, once per year, a report focused on the implementation of this Code of Ethics.

The report should include:

- the results of Internal Audit focused on Code of Ethic implementation
- the training activity
- the suggestions for improvement
- the violations (with detailed information about each violation)

The Ethics Report shall be submitted to the Managing Director and discussed within a Board Meeting.

4.8 Improvement and Review

The Code of Ethics implementation will be monitored and reviewed by both internal and external auditors who shall submit their conclusions to the Ethics Committee. Modifications are possible from time to time. You can make suggestions by submitting comments to the Managing Director or to any member of the Board of Directors.

Should any of the provisions of this Code be judged by a court or other tribunal of competent jurisdiction as illegal, invalid or unenforceable, such provisions shall be limited or eliminated to the minimum extent necessary so that this Agreement shall otherwise remain in full force and effect.

4.9 Miscellaneous

This Code of Ethics has been approved by the Board of Directors.

A copy of the Code of Ethics is provided to all interested parties and must be countersigned for acknowledgment by individual signing with ICMQ an employment of professional contract.

This Code is a part of general employee training and development.

Section 3 of this Code of Ethics is fully binding for ICMQ India and its counterparts.

You may contact the Chief Compliance Officer at your choice by post, telephone, fax or e-mail.

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India
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