

# Code of Ethics



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# Message from our CEO

Colleagues,

**At LRQA, our purpose is clear: to shape a better future, together. As we help clients navigate the rapidly changing risk landscape, and therefore build a safer, more secure, and more sustainable future, we also have an obligation to uphold the highest ethical conduct ourselves.**

Doing the right thing means acting with integrity at all times. This includes being open and honest in our business dealings, protecting the health and safety of our colleagues, and delivering on our Environmental, Social and Governance (ESG) commitments set out in Our Planet, Our Plan to make a positive impact.

Doing the right thing is key to maintaining trust from our clients, employees and stakeholders and, ultimately, crucial to our strategy to be the leading global assurance partner. The LRQA Executive Committee and I are clear; we will not tolerate improper business practices. Remember, any lapse, no matter how small, could have serious consequences for the long-term success of LRQA.

This Code of Ethics, supported by our Values and Behaviours Framework, should enable us all to do the right thing and empower us to speak up if we see inappropriate behaviour, knowing that we will be supported and listened to, without fear of retaliation.

Please do take the time to familiarise yourself with this Code and ask for help if you are not sure what to do.

On behalf of our Board of Directors and Executive Committee, thank you for your commitment to doing the right thing.

**Paul Butcher**  
Chief Executive Officer  
LRQA

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Vision

Integrity

Togetherness

Ambition

Expertise





# Vision

Determined to make a difference





# Your guide to our Code of Ethics

This Code of Ethics (our Code) is designed to guide our day-to-day activities and applies to all colleagues. It sets out the principles we follow to ensure we do things ethically, transparently, and safely.

Our Code is supported by our Business Partner Code of Conduct, which sets out the principles we expect our suppliers, sub-contractors and joint venture partners to follow, and our Group Policies (see [Helpful Resources](#)).

## Our Values and Behaviours

Our **Values** define us and drive our behaviours. Our **Behaviours** are the tangible, everyday actions that drive our success, underpin our culture, and set out how we work together to achieve our strategic priorities.

We have five values – **Vision, Integrity, Togetherness, Ambition, and Expertise** – and each value is linked to one of our five behaviours – **Determined to Make a Difference, Accountable for Doing What is Right, Collaborative and Inclusive, Relentless in Testing Boundaries, and Owning our Delivery**.

Our Values and Behaviours and the principles in our Code are intrinsically linked. Our Code helps us to uphold our values and action our behaviours. We have aligned each section of our Code to our values and behaviours to demonstrate this.

Our Code, together with our Values and Behaviours Framework, guide how we show up every day and support our strategy of LRQA being a place where everyone wants to work.





# Our expectations

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Each of us are responsible for our actions and behaviours.

## This means:

- We are accountable for our actions and pause before we do something to consider the potential consequences.
- We are familiar with our Code and its supporting policies and procedures.
- We complete any mandatory training assigned to us on time.
- We seek out training and development opportunities.
- We seek guidance from colleagues if we are not sure what to do.
- We raise a concern if we suspect something is not right.
- We do not retaliate against colleagues who speak up.

## In addition, for our managers:

- We lead by example.
- We regularly connect with our teams and coach team members on how to live our values and the principles set out in our Code.
- We publicly recognise and praise team members that proactively demonstrate our values and celebrate achievements and contributions.
- We encourage colleagues to share ideas, ask questions and raise concerns.
- We listen and act if a colleague raises a concern to us.

## Consequences

Failure to comply with the principles set out in our Code could result in severe consequences for you and LRQA. LRQA takes breaches of our Code seriously and will take appropriate action in line with our just and fair culture. This may include disciplinary action up to and including dismissal.

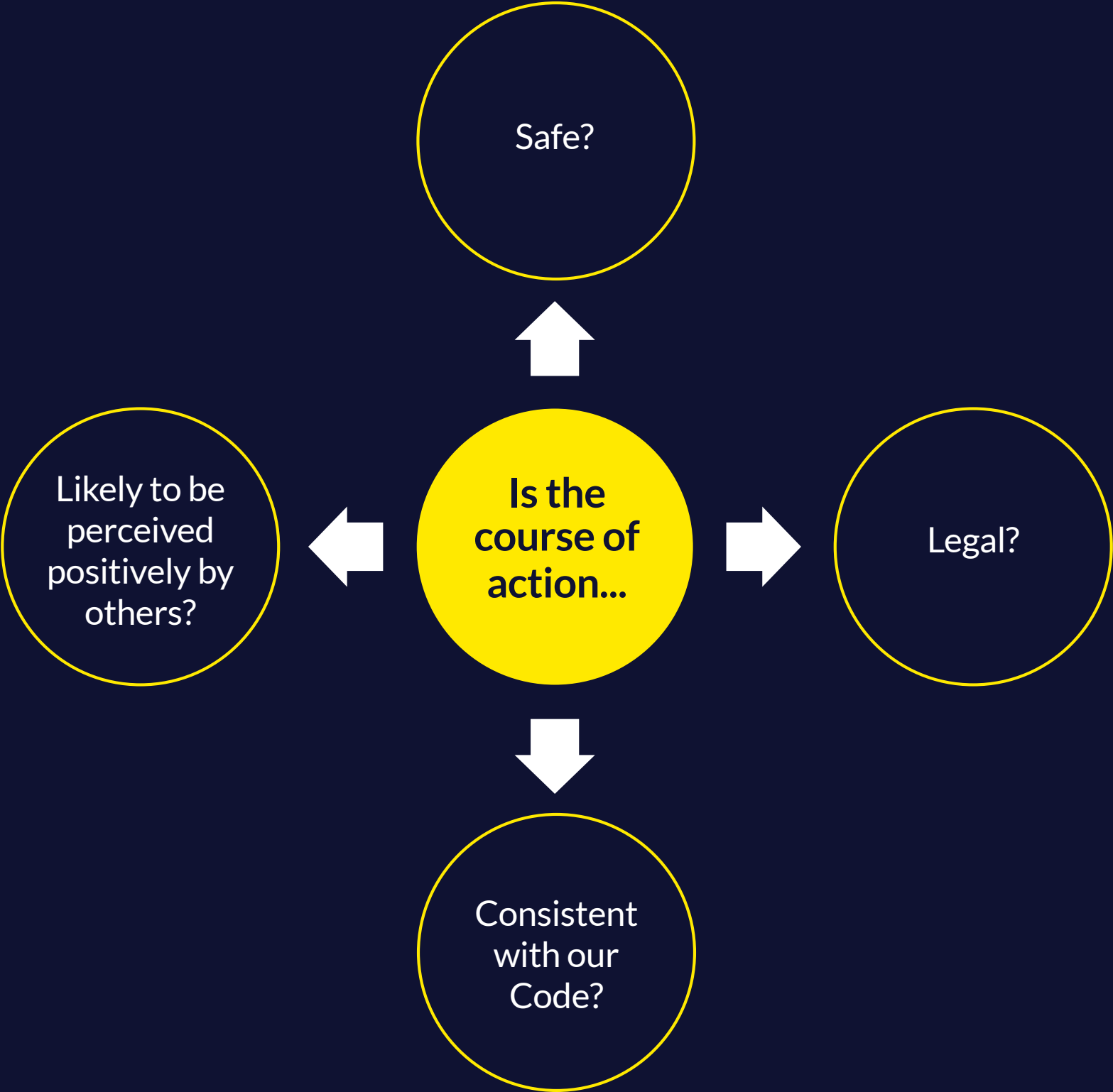




# Handling ethical dilemmas

Our Code is not designed to be a complete set of rules which cover every situation. Instead, the principles should act as a guide in determining the right approach together with good judgment and common sense.

**If you encounter an ethical dilemma, it can be helpful to ask yourself:**



If the answer to any of these questions is **“NO”**, or if you are not sure, you should:

- look for alternative courses of action where you can confidently answer “YES” to each question; and/or
- follow the speak up process on the next page to see what to do if you have a question or concern



# What to do if you have a question or concern

When it comes to dealing with ethical dilemmas, it is important to remember that identifying the right course of action is not always straight forward and that you are not alone. It is always better to pause and ask a question if you are not sure what to do.

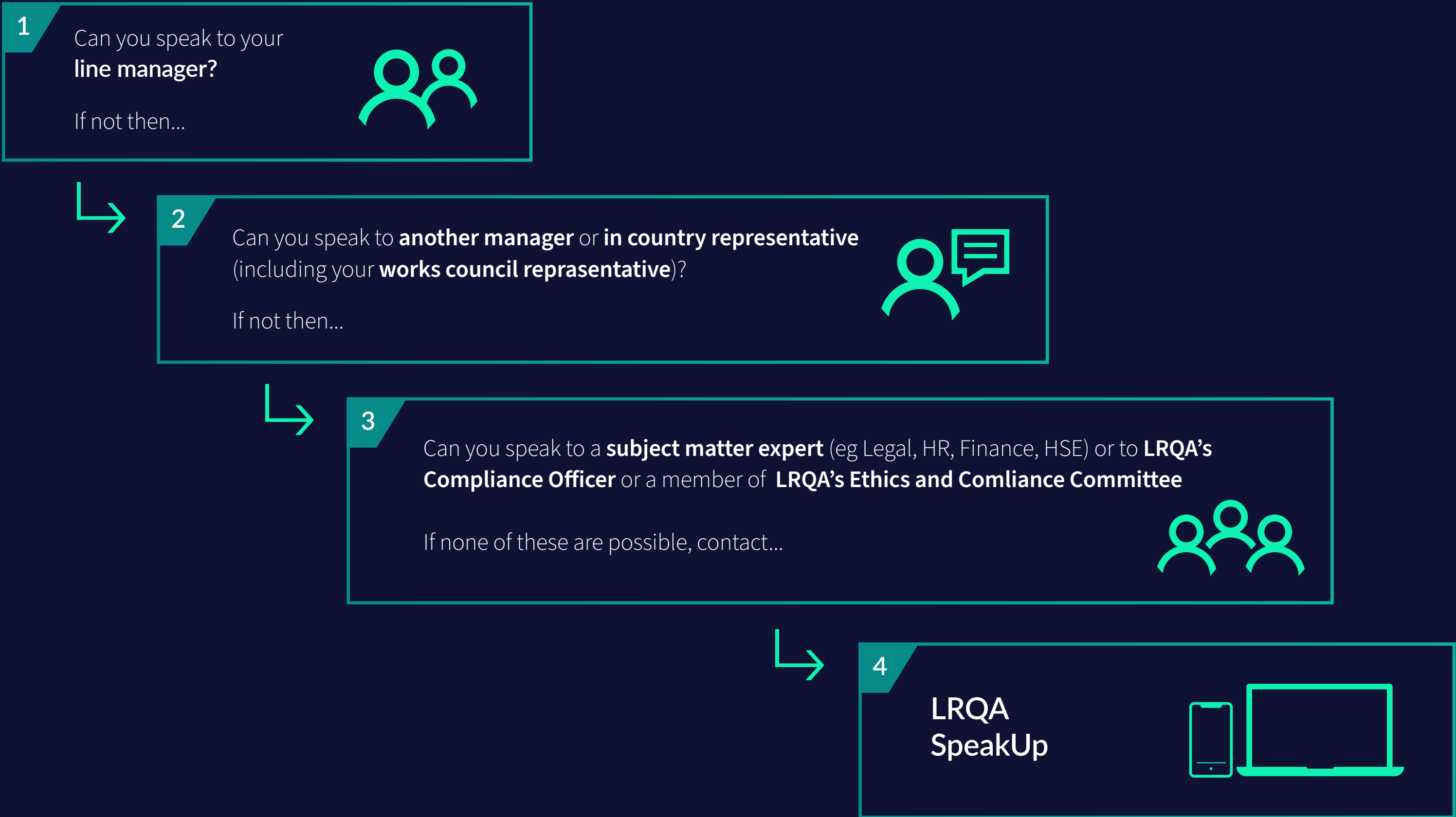
We are committed to creating a culture where colleagues feel safe to ask questions or raise a concern, knowing that they will be supported and listened to, without fear of repercussions. LRQA does not tolerate acts of retaliation against anyone for raising a genuine concern or participating in an investigation.

We have four main Speak Up channels. Wherever possible, we encourage you to have a conversation directly with the person whose conduct is concerning you or with your line manager.

LRQA SpeakUp, is our confidential speak up channel operated by People InTouch, an independent company. Using this channel, you can raise concerns confidentially and anonymously if you wish at any time in multiple languages.

Find out more about LRQA SpeakUp →

## Speak Up channels







# Integrity

Accountable for doing what is right





# Impartiality

- Integrity is at the core of everything we do.
- We avoid situations in which our professionalism, independence or impartiality may be compromised, or could be perceived as being compromised.
- Our services are performed honestly and transparently.

## We:



- maintain our independence.
- act fairly, honestly, transparently and with integrity.
- act in the best interest of LRQA.
- carry out our services in line with our standards.
- present our findings clearly and accurately.
- maintain accurate and complete records.
- encourage colleagues to speak up if they have any concerns.
- compete fairly **(see Fair business conduct, competition and anti-trust)**.
- declare any conflicts of interest **(see Conflicts of interest)**.

## We never:



- carry out services in a way which risks compromising our ethical standards.
- carry out accredited services on our own solutions.
- give in to pressure, influence or inducement to change our findings or decisions.
- allow personal relationships to influence delivery of our services or choice of external business partners **(see Conflicts of interest)**.

See examples...



# Conflicts of interest

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- We avoid situations where conflicts of interest could be seen as influencing our decisions or actions, to make sure our business activities are carried out independently and impartially.
- If we identify an actual or potential conflict of interest, we are open and transparent about the circumstances and take steps to remove, mitigate or resolve the conflict.

## We:



- avoid situations which may influence our judgment or could be perceived as influencing our judgment.
- avoid any potential conflict of interest between professional and personal matters.
- follow procedures designed to control situations where separate parts of our business are providing services to the same client.
- consider recent work experience and family connections when assigning auditors and inspectors to clients.
- disclose any actual or potential conflicts of interest, including personal or family connections to clients, suppliers and prospective colleagues.
- record decisions and actions.

## We never:



- carry out accredited services on behalf of any entity that forms part of the LRQA Group or any joint venture. Note this does not prohibit an LRQA entity working under the direction of another LRQA entity to deliver accredited services to a client.
- accept any appointments with a competitor or client.
- take decisions in the recruitment, promotion or management of family members or close personal friends.
- influence business decisions related to a client, supplier, or business partner in which we, a family member or a close friend, has a material financial or commercial interest.
- share confidential information with someone not authorised to have it.

[Did you know?](#)[See examples...](#)



# Anti-bribery and corruption

- We do not tolerate or engage in bribery or corruption in any form anywhere in the world.
- We demand the same zero-tolerance commitment from those we work with.

## We:



- act with integrity.
- only give or accept customary gifts or hospitality which are reasonable in value and nature, and that have been approved and recorded in line with our Gifts and Hospitality Policy.
- obtain approval for charitable donations and sponsorships in line with our Anti-Bribery and Corruption Policy.
- seek to engage with clients, suppliers and business partners that are committed to conducting business free from bribery and corruption.
- speak up if we know of or suspect that a bribe or facilitation payment has been offered, given, requested or accepted.

## We never:



- offer, give, request, accept or authorise bribes.
- offer, make or authorise facilitation payments, unless there is a threat to our health, safety, freedom or property.
- direct, instruct, or allow suppliers, business partners or other third parties to offer, give, request, accept or authorise bribes or facilitation payments on our behalf.
- make donations or enter into sponsorships if they are intended to, or could be perceived as, influencing business decisions or outcomes.

Did you know?

See examples...



# Sanctions and export controls

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- We comply with all applicable laws and regulations related to sanctions and export controls.

## We:



- use proprietary software to screen clients and suppliers.
- monitor the sanctions landscape with a focus on those countries which present greater sanctions risk and take action where required.
- speak up if we know of or suspect a breach of sanctions or export control laws or regulations.

## We never:



- enter into transactions or take any action which we know to contravene national or international sanctions or export controls.

Did you know?

See examples...



# Fair business conduct, competition and anti-trust

- We compete fairly and in accordance with applicable competition and anti-trust laws.

## We:



- make sure the information we provide about LRQA and our services is accurate, fair and reasonable.
- take care when engaging with competitors as part of trade associations and industry bodies and ensure our interactions are in line with our Competition Compliance Law Policy.
- comply with any applicable merger control requirements when carrying out mergers and acquisitions activities.
- agree fair contract terms.

## We never:



- enter into arrangements (formal or informal) with competitors, trade associations or industry bodies which result in price fixing, bid rigging, market allocation or arrangements to limit supply.
- allow two different parts of LRQA to bid for the same opportunity.
- seek to gain an advantage in a market by selling our services below cost.
- make untrue statements about competitors, their operations or services.
- share our confidential or commercially sensitive information with competitors.
- request or use confidential or commercially sensitive information belonging to our competitors.
- abuse a strong bargaining position to the detriment of a weaker party.

Did you know?

See examples...



# Accurate financial records and anti-fraud

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- We use internal controls to maintain accurate and complete financial records of our business activities in line with applicable laws, technical and professional standards.
- We do not engage in fraud.

## We:



- correctly and accurately record and maintain details of our business activities in our financial records in line with applicable accounting standards and our finance policies.
- prepare our financial records on time, representing our financial position accurately and completely.
- approve business transactions in line with our Delegations of Authority.
- maintain internal controls to avoid unauthorised use of our assets and resources.
- monitor our internal financial controls in accordance with industry guidelines.

## We never:



- engage in dishonest or fraudulent activities, such as deceit or theft.
- record false or deliberately misleading entries in our financial records.
- influence others to do anything that would compromise the accuracy of our financial records.

[See examples...](#)



# Political activities and donations

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- LRQA has no political bias. We make no donations to political parties.

## We:



- are open and transparent about any engagement or interaction with members of the political community.
- participate in activities designed to enhance and improve Environmental, Social and Governance (ESG) regimes throughout the world.
- take care when undertaking political activities in a personal capacity, to ensure LRQA resources or reputation are not used.

## We never:



- make political donations or engage in political activities in the name of LRQA.
- lend our reputation to one particular political regime.
- speak to the media or politicians about our business activities without approval.

[See examples...](#)



# Prevention of tax evasion and money laundering

- We do not engage in money laundering or tax evasion, nor do we facilitate the tax evasion of others.

## We:



- verify bank accounts before making payments to them.
- manage our tax affairs in accordance with all applicable laws and regulations.
- are alert to red flags that may indicate or suggest fraud, money laundering or tax evasion.

## We never:



- engage in any action or activity which is intended to assist anyone else engage in tax evasion.

[See examples...](#)





# Togetherness

Collaborative and inclusive





# Inclusivity and equity

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- We believe in being respectful and embracing our differences.
- We forge strong relationships, show global awareness and champion inclusivity.
- We have a zero tolerance approach to discrimination or harassment.

## We:



- treat colleagues fairly and expect colleagues to build positive relationships with others.
- encourage colleagues to seek out and embrace other view points and incorporate into their own thinking.
- base all employment decisions, including training opportunities, hiring and promotions, on merit, talent, and suitability.
- reward our employees in line with their contribution to our business.
- operate in compliance with all applicable employment laws relating to working hours, environment and pay.
- manage disputes fairly.
- treat our contractors and agency workers with respect.
- recognise that colleagues have the right to collective bargaining.

## We never:



- make employment decisions based on any criteria other than on merit.
- tolerate bullying, harassment, discrimination or unfair treatment of any kind.

See examples...





# Health, safety and wellbeing

- The health, safety, security and wellbeing of colleagues is our number one priority. We want everyone to feel at their best and to go home safe and healthy every day.
- We strive to operate a resilient health and safety system, based on mutual trust and respect.
- Nothing is so important or urgent that it cannot be done safely. Colleagues are empowered to STOP work when they feel that their or others' health, safety or security is at risk.

## We:



- act in accordance with our Quality, Health and Safety Policy and comply with applicable health, safety and environmental laws and requirements.
- follow our LifeSavers at all times (**see LifeSavers**).
- use correct Personal Protective Equipment (PPE) and replace damaged or out of date items.
- intervene or report whenever and wherever we see an unsafe situation or incident.
- support colleagues who exercise their right to stop when it is felt that the health, safety or security of themselves or others is at risk.
- promote wellbeing initiatives and benefits through our Thrive programme.

## We never:



- put ourselves or others at risk from our actions.
- assume someone else will report an unsafe situation or incident.
- come to work or drive under the influence of alcohol or drugs or when using medication improperly.
- suffer in silence or wait until our health is damaged.
- retaliate against colleagues that stop business activities when there is a genuine risk to health or safety.
- shame people who express new or different ideas.

## What is S.T.O.P?

Apply **S.T.O.P.** before and during your work:



- **STOP**
- **THINK**
- **OBSERVE**
- **PLAN**

Apply **S.T.O.P.** at all times and complete a **Last Minute Risk Assessment**, e.g. by using the **LMRA on Focus**, before you start.



The four LifeSavers are essential safety requirements, designed to keep us all safe and healthy regardless of our role.

## Rule 1

Only perform a task if you are trained, competent and fit.



LS1: Be trained, competent and fit for work

## Rule 2

Identify the hazards before starting a job and stop at any point if the risk changes.



LS2: Risk assessment and S.T.O.P

## Rule 3

Stay as far away from a hazard as possible and keep out of the “line of fire” of suspended loads, moving machinery and transportation.



LS3: Safe body positioning

## Rule 4

Know the emergency arrangements and be prepared to respond.



LS4: Emergency preparedness

Remember, if the tasks or circumstances change,

# S.T.O.P.



# Working with our suppliers and business partners

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- Suppliers and other business partners, including agency workers and sub-contractors, play an important role in helping LRQA to conduct business globally.
- We require the same dedication and commitment to operating ethically and with integrity from our suppliers and business partners.

## We:



- conduct due diligence and sanctions screening on our suppliers and business partners.
- allow our suppliers to compete fairly and select our suppliers based on competency, capacity and value.
- only engage agents and intermediaries where there is a strong business case to do so.
- expect our suppliers and business partners to apply the principles set out in this Code and comply with our Business Partner Code of Conduct.
- have clear terms and conditions in place with our suppliers and business partners.
- encourage our suppliers and business partners to speak up to LRQA if they have concerns.

## We never:



- direct, instruct, or allow suppliers or business partners to offer, give, request or accept bribes or facilitation payments on our behalf **(See Anti-bribery and corruption).**
- engage the services of an agent or intermediary which has not been approved in accordance with our Agents and Intermediaries Policy.





# Protecting confidential information

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- We protect our confidential information and third-party confidential information provided to us and ensure it is used for legitimate and authorised business uses only.
- We never use illegal or dishonest methods to get confidential information.

## We:



- keep all data and documents secure in accordance with our procedures.
- protect our confidential information and only use it for authorised business purposes.
- protect confidential information belonging to our clients, suppliers and business partners in our possession as we would our own confidential information.
- share confidential information on a need to know basis.
- use non-disclosure agreements (where appropriate).

## We never:



- allow or knowingly facilitate the entry of unauthorised people into our offices or IT systems.
- share passwords.
- disclose any confidential information outside LRQA unless the information is properly protected and only if authorised to do so.
- seek or use confidential information that LRQA is not authorised to have or has been obtained through unofficial channels or by unethical means.
- use social media on behalf of LRQA in an official capacity without approval.
- allow third parties to use the LRQA brand without approval.

[Did you know?](#)[See examples...](#)



# Protecting personal information

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- We respect an individual's right to privacy and protect personal information in line with applicable laws.

## We:



- keep all personal information up to date, safe and secure and in accordance with our Data Protection Policy.
- tell colleagues why we are processing their personal information and explain their individual rights.
- limit the collection of third party personal information.
- respond to subject access requests in accordance with applicable laws.
- delete any personal information no longer needed.
- report any unauthorised access or disclosure of personal information as soon as possible to our Data Protection Officer.

## We never:



- collect personal information if it is not required or relevant.
- give out anyone's personal information without making sure there is a lawful reason to do so.
- sell personal information to third parties.
- share personal information unless there is a lawful reason to do so.

[Did you know?](#)

[See examples...](#)



# Protecting property and resources

- We use LRQA property and resources, including IT systems, materials, places of work and equipment for legitimate business activities.

## We:



- treat LRQA property and resources as if they were our own.
- only use LRQA property and resources for business activities, in accordance with the Acceptable Use Policy. Reasonable personal use of electronic communication resources is permitted.
- take care to maintain and look after any LRQA property or resources in our possession to protect it from theft, damage or cyber attack and avoid waste.
- protect any third party property or resources in our possession as we would protect LRQA property and resources.
- report any theft, loss, damage or unauthorised access to property or resources.
- stay alert for phishing attempts and activities and report concerns to our Chief Information and Security Officer.

## We never:



- use LRQA or third party systems to access, copy, store or transmit anything considered to be offensive, obscene or inappropriate.
- use or divert LRQA or third party property or resources for personal gain  
**(see Conflicts of interest).**

[See examples...](#)





# Ambition

Relentless in testing boundaries



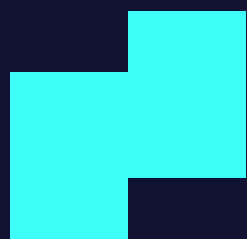


# Sustainability - Our Planet, Our Plan

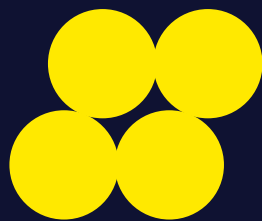
At LRQA, we work with our clients to look towards a more sustainable future; that means helping them to build safer, cleaner, more resilient and more ethical businesses. To be a credible partner and support their sustainability strategies, we need to ensure that our own business is operating to the highest standards, too.

Our Planet, Our Plan has been the creation of more than 1,500 colleagues who worked together to lay out our vision and ambition to be a company that does the right thing by our colleagues, clients, communities, stakeholders and our planet. It is our commitment to being a force for good, delivering profit for a purpose, and playing a leading role in delivering the UN Sustainable Development Goals. Divided into seven core commitments that are underpinned by 391, time-bound performance indicator we will measure, score, and externally verify every indicator using a positive to negative system, and publish our progress with full honesty and transparency, including when we fall short.

Key to its success is how we govern Our Planet, Our Plan. It will be led, managed, directed, and controlled by seven leadership teams, one per commitment, who represent every region, organisational level, and the full diversity of those impacted by our work. This includes colleagues, clients, suppliers, community members, and environmental and humanitarian groups.



1. Governance



2. Community



3. Environment



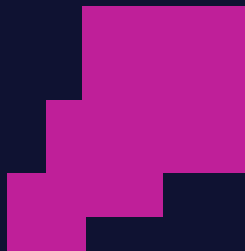
4. Equity



5. Safety



2. Inclusivity



7. Education



# Modern slavery, human trafficking and child labour

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- We are committed to upholding the human rights of our colleagues (see Inclusivity and equity) and those who we work with.
- We do not tolerate modern slavery, child labour or human trafficking and we demand the same commitment from those we work with.

## We:



- align our policies to the United Nations Universal Declaration of Human Rights and the relevant International Labour Organisation standards.
- are alert to the risks of modern slavery, child labour and human trafficking in our organisation and when conducting our business activities.
- conduct due diligence to ensure there is no modern slavery or child labour in our supply chain; and only engage with suppliers that are committed to conducting business free from modern slavery, child labour and human trafficking.
- are committed to working with our clients and business partners to respect and remedy human rights.

## We never:



- use child, forced or involuntary labour.
- turn a blind eye to suspicions of abuse in our supply chain.

[See examples...](#)





# Expertise

Owning Our Delivery





# Empowering and investing in our colleagues

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- We believe it is important to value and invest in our people; they are our greatest asset.
- We require colleagues to perform their role to the best of their ability in accordance with our policies and procedures, quality standards and/or applicable licences to operate, law and regulations.

## We:



- use care and good judgment when speaking or sharing information about our business, colleagues, clients, suppliers or business partners.
- make sure that colleagues are appropriately trained in our systems and procedures before carrying out services for our clients.
- invest in training to ensure our colleagues remain competent and capable to perform their roles and to deliver our services and maintain continual professional development.
- maintain complete and accurate records of training completed by colleagues.
- make sure that colleagues have the necessary competence and experience to perform their role and assignments.
- regularly review the performance of our colleagues, identify development opportunities and provide constructive feedback.
- encourage colleagues to fulfil their career aspirations and look for opportunities to help them develop.
- provide mentoring and coaching programmes.
- perform witnessed audits on key auditors and inspectors.

## We never:



- allow colleagues to carry out tasks as part of assessments or inspections which they are not qualified or capable to deliver or which are not in accordance with our quality management system.
- ignore under performance.



# Our accreditations and qualifications

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- Our accreditations are our licences to operate parts of our business.
- We carry out our accredited services in accordance with our quality management system and our licences to operate.

## We:



- always act fairly, honestly, transparently and with integrity in our interactions with our accreditation and other industry bodies.
- avoid situations in which our independence or impartiality may be compromised **(see Impartiality)**.
- carry out our accreditation services in line with authorised methods and procedures.
- report any divergence from our approved quality management system.
- co-operate with our accreditation bodies and act in accordance with their guidelines.
- make available to our clients relevant information about the accredited services we provide.
- correct any non-conformities identified during an audit of our quality management system as soon as practicable.

## We never:



- misrepresent the accreditations or other qualifications held by LRQA.
- mislead or provide incorrect or manipulated information to accreditors or other industry bodies.
- act in a manner that would place our accreditations at risk.
- carry out work we are not competent to perform.
- fail to ensure our competence and skills are fully up to date.

[Find out more about our accreditations and qualifications](#)



[See examples...](#)



# Helpful resources

Our Group Policies support the principles set out in this Code. Our Group Policies include the following:

Anti-Bribery & Corruption Policy	→	Anti-Money Laundering Policy	→
Agents and Intermediaries Policy	→	Competition Law Compliance Policy	→
Conflicts of Interest Policy	→	Data Protection Policy	→
Gifts and Hospitality Policy	→	Modern Slavery Policy	→
Sanctions Policy	→	Quality, Health and Safety Policy	→





YOUR FUTURE. OUR FOCUS.

About LRQA:

LRQA is a leading global assurance partner, bringing together unrivalled expertise in assessment, advisory, inspection and cybersecurity services – to help its clients negotiate a rapidly changing risk landscape.

Operating in more than 120 countries and recognised by over 30 accreditation bodies worldwide, LRQA covers almost every sector to achieve our purpose: shaping a better future together.

We’re proud of our heritage, but it’s who we are today that really matters, because that’s what shapes how we partner with our clients tomorrow. By combining strong values, decades of experience in risk management and mitigation, and a keen focus on the future, we’re here to support our clients as they build safer, more secure, more sustainable businesses.

From independent auditing, certification and training; to technical advisory services; cybersecurity consultancy and data-driven supply chain transformation, our innovative end-to-end solutions help our clients shape their own future, rather than letting it shape them.

Get in touch

Visit [www.lrqa.com/uk](http://www.lrqa.com/uk) for more information, email [enquiries.uk@lrqa.com](mailto:enquiries.uk@lrqa.com)



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