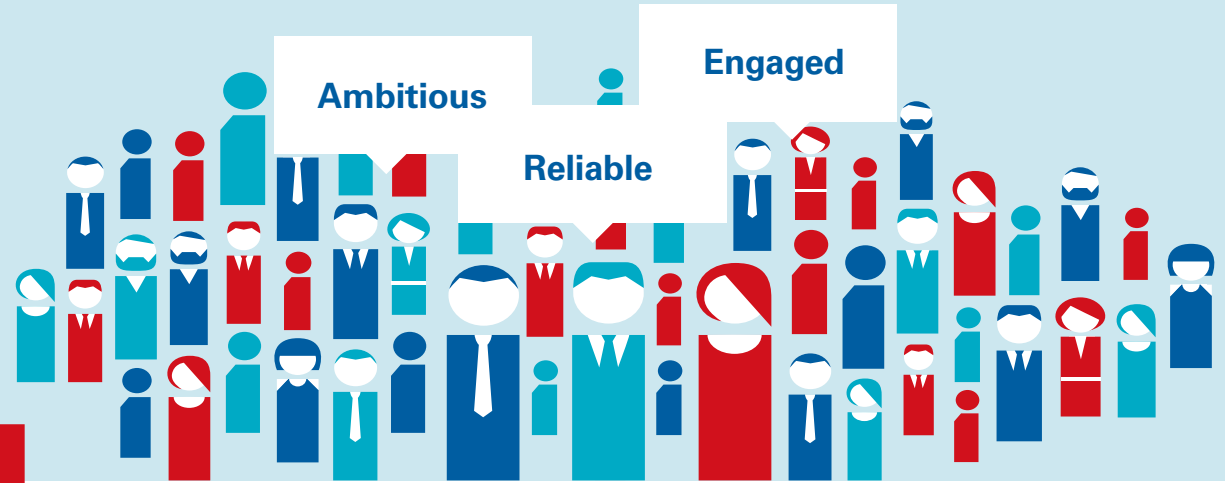


Code of Conduct



We all have to conduct our business within the framework of applicable professional standards, laws and regulations. The Kiwa Code of Conduct is meant as a frame of mind. Each of us at Kiwa has an obligation to know and understand this Code and the values they are based on. We also have an obligation to comply with the letter and the spirit of the Code and to help others do the same. The Code is not a substitute for our individual responsibility and our good judgment. Furthermore, we must encourage ourselves and each other to seek additional guidance and support whenever necessary. Act wisely; let your common sense and your gut feeling guide you – and seek for help if you are in any doubt regarding proper behaviour.

Interacting with customers

When interacting with customers, we

- ▶ conduct sales and marketing activities with integrity;
- ▶ avoid any conflicts of interest;
- ▶ respect gift and entertainment restrictions;
- ▶ are aware of special restrictions related to government customers;
- ▶ safeguard customer information.

Quality and excellence

When striving for quality and excellence, we

- ▶ abide by policies, procedures and regulations;
- ▶ always ensure proper revenue recognition;
- ▶ do not create any side letters obscuring improper behaviour;
- ▶ follow protocols for external release of information; when in doubt, we contact CorpCom;
- ▶ promote proper conduct and procedures.

Company assets

When using or working with company assets, we

- ▶ safeguard all company assets;
- ▶ maintain business records in accordance with legal and accreditation guidelines and retention policies;
- ▶ prevent insider trading.

Interacting with colleagues

When interacting with colleagues, we

- ▶ respect differences;
- ▶ prevent harassment, bullying, violence and intimidation;
- ▶ welcome diversity;
- ▶ protect privacy rights.

Behaviour

When it comes to our behaviour, we

- ▶ promote safety and health;
- ▶ prevent alcohol or substance abuse at work;
- ▶ respect the human rights and dignity of others;
- ▶ promote responsible community and charitable activities;
- ▶ protect the environment;
- ▶ spend company money as if it were our own.

Consider these **10 ethical questions** when in personal doubt

Who else could be affected by this?

Is it against Kiwa or professional standards?

Is it legal?

Will it reflect negatively on myself or Kiwa?

Does it feel right?

Would I be embarrassed if others knew my course of action?

How would this look in the newspapers?

What would a reasonable person think?

Can I sleep at night when doing this?

Is there an alternative action that does not pose an ethical conflict?

Ethical compass

We are committed to demonstrating and living up to high standards of corporate ethical behaviour. This commitment rests on the personal actions and accountability of each and every one of us. Use our core values as a moral and ethical compass that enables you to do business with integrity and honesty. Recognise each event, think it over, decide a course of action, test your decision and then proceed with confidence.

Reports, concerns and whistle-blowing gatekeeper

If anything concerning conduct doesn't feel right, contact your manager, the HR department, the Executive Council or the independent whistle-blowing gatekeeper. When non-compliance to our Code of Conduct is reported or suspected, steps will be taken to investigate and, if appropriate, remedy the situation. Reports and concerns can – and must – be expressed in a fair, honest and respectful manner to either your manager, the Executive Council or via the independent whistle-blowing gatekeeper. Appropriate action will then be taken. Those who violate the Code or Kiwa policies will be subject to disciplinary action, up to and including dismissal.