



**CSA
Group**

CSA GROUP'S

CODE OF CONDUCT



OUR COMMITMENT TO INTEGRITY

Our Commitment to Integrity

A Message from Ash Sahi, President and CEO	p. 1
Using this Code	p. 2
Code of Conduct and Our Policies & Procedures	p. 2
Upholding Our Commitment to Integrity Through Value	p. 3

Protecting our Integrity

Compliance Program	p. 3
Asking Questions and Making Anonymous Reports	p. 3
Retaliation	p. 3

Integrity in Employee Obligations & Relations

Diversity Promotion and Equal Opportunity	p. 5
Preventing Harassment in the Work Environment	p. 5
Workplace Health and Safety	p. 5
Substance Abuse	p. 5
Workplace Violence	p. 6
Compliance with Laws	p. 6
Protection of Personal Information	p. 6
Protection of Company Information	p. 6
Conflicts of Interest	p. 7
Use of Company Assets	p. 7
Responsible Use of Technology	p. 7
Records Management and Disposal	p. 7
Accuracy of Technical & Other Business Records	p. 8
Financial Accounting, Internal Controls and Auditing Practices	p. 8
Intellectual Property	p. 8
External Communications	p. 8

Integrity in Client Relations

Bribery and Other Corrupt Practices	p. 9
Gifts and Entertainment	p. 9
Confidential Information	p. 9
Fair Marketing and Advertising	p. 10

Integrity in Government and Regulatory Agency Relations

Conducting Business with Government	p. 11
Lobbying	p. 11
Political Activities and Contribution	p. 11
Regulatory Compliance	p. 11
Witness Testimony	p. 11
International Business Dealings	p. 12
Export Compliance	p. 12
Trade Sanctions	p. 12

Integrity in Global Community Relations

Dealings with other Standards Development and Certification Bodies	p. 13
Environment Compliance	p. 13
Making a Positive Difference in Our Communities	p. 13

A MESSAGE FROM ASH SAHI, PRESIDENT & CEO



Ash Sahi, President & CEO

Dear esteemed colleagues, customers, members and stakeholders:

For more than 90 years, CSA Group has operated with the strongest commitment to integrity. Through this dedication, we have earned a solid international reputation for the quality and value of our work. Promoting integrity in all areas of our operations is now more important than ever before given the continuous evolution of the global marketplace and the increased scrutiny facing the business world.

CSA Group's continued success depends on our ability to maintain our reputation. We cannot accomplish this without the support of our employees whom we view as our greatest assets. Each and every employee is an integral part of fulfilling CSA Group's commitment to integrity, and we rely on each member of CSA Group and its divisions to help ensure that our values are reflected in everything we do.

This Code of Conduct reflects our CSA Group values and it is a guide as to how we ensure we are conducting our operations to the highest ethical standards. It provides basic principles that guide interactions with fellow employees, clients, competitors, government bodies and the global community. When circumstances warrant additional guidance, it provides all readers with contacts for appropriate information and advice on matters of integrity on a confidential basis, by phone or email.

All employees will be required to read and adhere to the Code of Conduct as it reflects our growing and evolving business. Employees will also be asked to formally acknowledge that they have received a copy of the Code of Conduct and have read it, as they will be required to abide by the Code as an employee of CSA Group.

CSA Group's longstanding legacy of addressing the vital needs of society is the result of our tremendous talent base, our well-respected customers, members and stakeholders, our increasing global focus and influence and our state-of-the-art technologies. CSA Group's values and commitment to integrity continue to allow us to create a better, safer, more sustainable world where standards work for people and business.

Sincerely,

Ash Sahi
President and CEO
CSA Group

USING THIS CODE

This Code of Conduct is a general overview of how CSA Group conducts business. This Code applies to our many stakeholders including: suppliers, customers, employees, consultants, agents, government officials, regulatory agencies and communities at large. Each section applies to one or more of these stakeholders and describes our commitment to integrity more fully.

This Code guides CSA Group so that we can conduct business with integrity. When a question arises about doing business with integrity, refer to this Code as well as our internal policies and guidelines.

CODE OF CONDUCT AND OUR POLICIES AND PROCEDURES

CSA Group's Code of Conduct does not supersede the detailed CSA Group Corporate Policies and Guidelines. Should there be any conflict, the Corporate Policies and Guidelines will govern.

If you perceive a conflict between this code and the CSA Group Corporate Policies and Guidelines, please contact the Executive Vice President, General Counsel & Corporate Secretary.

UPHOLDING OUR COMMITMENT TO INTEGRITY THROUGH VALUES

Our core values reflect who we are, and how we do business. They define a code of conduct that's truly important to us.

Accountability: We apply CSA Group's values and mission and take responsibility and are accountable for our work and our actions in the decisions we make for our colleagues, our customers and our members.

Continuous Learning: CSA Group is a supportive, action-oriented organization. We invest in our colleagues so that every CSA Group employee improves their personal and professional skills. We work to exceed the expectations of our customers and members. CSA Group provides experts and we ensure that we continually deliver the highest standards of excellence and quality.

Integrity & Mutual Respect: We work in an honest, trust-based, professional and principled manner to deliver exceptional results to our members and customers, striving to exceed our goals. We embrace and promote an inclusive and diverse work culture where decisions are guided by the highest standards of fairness, objectivity and dignity.

Safety: We promote public safety and lead by example through our own workplace health and safety practices, the services we provide, and the values we live.

Sustainability: CSA Group is dedicated to promoting sustainable solutions on behalf of our stakeholders and the communities we serve, through our environmental and economic practices, our contribution to driving social good, and by the values we live each and every day.

COMPLIANCE PROGRAM

CSA Group has a corporate compliance program to enforce compliance with all relevant statutes, which includes the following components:

- Senior Management Involvement and Support;
- CSA Group Corporate Policies and Guidelines;
- Training and Education;
- Monitoring, Auditing and Reporting Mechanisms; and
- Consistent Disciplinary Procedures and Incentives.

ASKING QUESTIONS & MAKING ANONYMOUS REPORTS

Employees are strongly encouraged to ask questions or report any compliance concerns regarding this Code of Conduct, CSA Group's internal policies and procedures, or any applicable laws or regulations. CSA Group provides various reporting channels, including a confidential phone and secure web helpline that are hosted by Ethicspoint, a trusted third party supplier. All reports will be investigated with fair and due process. Please check the online Helpline to either make a report electronically or find the local hotline phone number for your jurisdiction.



Online Help: www.csa.ethicspoint.com

EU law restricts operation of international helplines. If have questions, concerns or wish to make a report from the EU, please consult any of the following as appropriate in the circumstances:

- Their manager;
- The Executive Vice President, Finance and IT;
- The Executive Vice President, General Counsel and Corporate Secretary, and/or;
- The Executive Vice President, Human Resources.

Any of these people will be please to assist you and help answer your questions and concerns. Where you provide your contact information, we will strive to maintain confidentiality within the boundaries of due process and fairness.

RETALIATION

Anyone raising a question or concern in good faith regarding compliance with this Code has the right to do so and shall not be subject to reprisal or punishment. Retaliation in any form will not be tolerated.

“do what’s right ”



INTEGRITY

DIVERSITY PROMOTION & EQUAL OPPORTUNITY

CSA Group regards the diversity of its work force as a tremendous asset. We value and respect the range of talents and contributions of all people across the organization. We are committed to providing an environment of mutual respect and fairness with a focus on teamwork and equal opportunity. Our recruitment, hiring, training, evaluation, compensation, promotion, termination and all other employment decisions will be free from discrimination based on age, race, colour, religion, sex, sexual orientation, national origin, disability or any other applicable legislatively prohibited grounds.

PREVENTING HARASSMENT IN THE WORK ENVIRONMENT

CSA Group does not tolerate harassment in the workplace. Harassment can take many forms and is based on a person's characteristics including age, race, colour, religion, sex, sexual orientation, national origin, disability or any other applicable legislatively prohibited grounds. Accordingly, a harassment free work environment must be free from disrespectful or demeaning behaviour which can take many forms including physical actions, spoken or written words or media. Examples include negative comments or actions regarding one's national origin or age, physical characteristics, unwanted conduct of a sexual nature or bullying.

If you experience or are aware of any harassment, you should report it immediately.

WORKPLACE HEALTH & SAFETY

CSA Group's commitment to workplace safety is at the core of our business. All employees have a responsibility for maintaining a safe and healthy workplace and to conduct our operations in a safe and responsible manner. CSA Group abides by all applicable local workplace health and safety laws and is required to act upon any unsafe conditions or activities.

SUBSTANCE ABUSE

Alcohol abuse and illegal drug use in the workplace threaten everyone's safety. Working while under the influence can negatively affect job performance and can have serious safety consequences. CSA Group does not tolerate the possession, use, distribution or sale of any illegal drugs or any alcohol or drug abuse while employees are conducting business or while working on CSA Group's premises.

WORKPLACE VIOLENCE

CSA Group is committed to maintaining a workplace that is free of violence, intimidation and threats, whether by or against our employees. Examples of prohibited workplace violence include threatening remarks, verbal abuse, property damage or destruction, assault, physical injury or a statement or behaviour that a reasonable person could interpret as a threat of physical injury or death.

If you or someone else is in immediate danger, contact local police before reporting through internal channels.

COMPLIANCE WITH LAWS

CSA Group operates in many different countries and is committed to complying with all local laws, rules and regulations. If there is a conflict between local laws and anything in this Code of Conduct, then local laws will prevail.

PROTECTION OF PERSONAL INFORMATION

Personal information includes identifying information except name, business title, business address and business telephone or fax number. CSA Group has instituted practices that help ensure that personal information, including that of employees, members and customers is collected and handled responsibly and in accordance with applicable legislation.

PROTECTION OF COMPANY INFORMATION

During the course of employment, employees have access to a wide variety of confidential and proprietary information about CSA Group, its clients, its members and its stakeholders. We have a duty to safeguard confidential information and honour our contractual obligations. Any unauthorized disclosure of confidential information may cause harm to the owner of the information and may also result in serious penalties, both civil and criminal, for CSA Group. The obligation of confidentiality continues even after employment ends.

CONFLICTS OF INTEREST

A conflict of interest exists when a personal interest interferes – or has the potential to interfere – in any way with the interests of CSA Group. Conflicts of interest can influence judgment and interfere with job performance. Even the appearance of a conflict of interest must be avoided because it gives the impression of bias and may cause others to question CSA Group's integrity. Many situations can give rise to a conflict of interest, including but not exclusive to doing business with family members, diverting a corporate opportunity for personal gain, accepting gifts or money from clients or suppliers and acting on inside information gained through employment with CSA Group.

Review your own situation in order to identify any potential or actual conflicts of interest. If you identify any conflicts of interest, you must disclose them to your immediate manager.

USE OF COMPANY ASSETS

In an effort to be financially sustainable and to prevent theft, carelessness and waste, CSA Group employees are required to safeguard all company assets including but not limited to facilities, inventory, office supplies, equipment, vehicles and proprietary information. It is important that we protect these company assets and use them exclusively for valid business purposes.

RESPONSIBLE USE OF TECHNOLOGY

CSA Group provides electronic and computer technology to employees for use on the job. As employees, we recognize that information created, received or disseminated through these systems is not private and authorized company representatives may monitor these systems without notice.

RECORDS MANAGEMENT & DISPOSAL

CSA Group's policy is to retain and destroy records in accordance with applicable laws, CSA Group's records management policies and accreditation requirements. As employees, it is our responsibility to familiarize ourselves with and follow retention and destruction requirements for all documents used in the course of our work.

ACCURACY OF TECHNICAL & OTHER BUSINESS RECORDS

Transparency requires that accurate records are kept, both in paper and in electronic form. CSA Group requires honest, accurate and timely recording and reporting of information in order to make appropriate business decisions. As employees, we are responsible for the integrity and accuracy of CSA Group's documents, records and business information. We must never falsify documents, records or business information including test reports, procedures, personnel records and communications.

FINANCIAL ACCOUNTING, INTERNAL CONTROLS & AUDITING PRACTICES

CSA Group has a duty to ensure that all financial books and records present an honest and accurate accounting of the company's financial position. In particular, this means that CSA Group must accurately report all of its revenues and expenses, follow all internal control procedures, and never make false or misleading statements with respect to financials.

All CSA Group's books, records, accounts and financial statements must be maintained in sufficient detail, appropriately reflect CSA Group's transactions, be promptly disclosed in accordance with any applicable laws or regulations and conform to both applicable laws or regulations and to CSA Group's system of internal controls. All transactions must be properly authorized, completely and accurately recorded on CSA Group's books and recorded in accordance with generally accepted accounting principles.

INTELLECTUAL PROPERTY

CSA Group's intellectual property rights require strict legal protection and enforcement. Each of us is responsible for protecting CSA Group's intellectual property which includes, but is not limited to, trademarks, copyrights, patents, graphics, multimedia and written materials.

Aside from CSA Group's valued employees and members, the certification mark is CSA Group's greatest asset. CSA Group employs a zero tolerance policy with respect to the unauthorized use of the certification mark. As employees, we are required to immediately report any known infringements or counterfeit use.

EXTERNAL COMMUNICATIONS

It is important that any public statements, including disclosures to the media or the general public, are accurate, consistent across divisions and in accordance with CSA Group policies. Employees are not permitted to communicate with the media or to publish news using any media regarding CSA Group's business without express permission from the CSA Group Corporate Affairs department. All media inquiries shall be directed to CSA Group's Corporate Affairs department who will work with the appropriate technical, business and Corporate Legal Affairs personnel as necessary to prepare a response.

BRIBERY & OTHER CORRUPT PRACTICES

CSA Group conducts its business with honesty and integrity. CSA Group does not give or accept gifts or favours, regardless of their perceived nominal value, in exchange for any type of favourable treatment. Bribes or kickbacks in any form are not tolerated, and there are serious consequences associated with such behaviour including potential criminal prosecution of both individuals and organizations. Bribes can include cash, fees, commissions, credits, gifts, services in kind or anything of value. Also, CSA Group will not tolerate or retain third parties that engage in corrupt practices on its behalf.

CSA Group operates globally and in doing so, respects local business customs and market practices. CSA Group requires its employees, members, suppliers and agents to comply with applicable anti-bribery and anti-corruption laws regardless of cultural norms and does not allow, condone or participate in corrupt business practices. Under no circumstances will CSA Group employees, members, suppliers or agents, directly or indirectly, bribe or attempt to bribe a public official, employee or associate, at any level of government, including political candidates or employees of businesses that are owned by governments.

GIFTS & ENTERTAINMENT

While gifts and entertainment and other forms of hospitality are commonly provided in the business context, CSA Group must be careful to maintain its independence and integrity. CSA Group believes in competing for clients based on the merits of its services and not by using inappropriate gifts or entertainment to influence clients or potential clients.

Employees may give CSA Group promotional materials to others, provided these gifts are lawful and nominal in value, and cannot be interpreted as seeking a special favour for CSA Group or for its employees. If you have concerns about giving or receiving something of value in the course of performing your duties, please contact to the Executive Vice President, General Counsel & Corporate Secretary.

There are strict rules that apply when dealing with government or public officials. For more information, see the Conducting Business with Government Section and the International Business Dealings Section.

CONFIDENTIAL INFORMATION

In the course of its business, CSA Group routinely gains access to the confidential information of its clients. This includes business processes and procedures, trade secrets, intellectual property, test reports and records among other types of information. CSA Group protects client confidential information, except where disclosure is necessary to perform CSA Group's work and as permitted by contract. When an employee leaves CSA Group, he or she must return all copies of confidential information and continue to keep information confidential.

FAIR MARKETING & ADVERTISING

CSA Group competes for business fairly and honestly. CSA Group gains competitive advantages through technical expertise and superior performance and does not exaggerate, mislead, omit or lie in marketing and advertising. While in some countries it is fair to compare ourselves to our competitors, we do not criticize or misrepresent their qualifications or services.

While CSA Group will jointly promote various activities such as public safety or sustainability with other organizations, suppliers, companies and stakeholders, it will not favour or promote the services or products of one company over another and shall remain neutral except where public safety may be at risk.

CONDUCTING BUSINESS WITH GOVERNMENT

CSA Group is independent of government. CSA Group abides by all laws, rules and regulations that apply when doing business with different governments, including the U.S. *Foreign Corrupt Practices Act* (FCPA), the *Canadian Corruption of Foreign Public Officials Act*, and the U.K. *Bribery Act*. There can be severe penalties associated with violating these laws, rules and regulations.

Government officials may be prohibited from accepting gifts, regardless of value. Government officials includes members of boards, commissions, corporations or other bodies established to perform or performing a duty or function on behalf of a state and includes officials or agents of public international organizations.

CSA Group employees who interact with government officials should never offer anything of value to a government official in the course of doing business.

LOBBYING

CSA Group may engage in lobbying around the world. Employees are required to report all lobbying activities in accordance with applicable lobbying legislation to the Executive Vice President, General Counsel & Corporate Secretary.

POLITICAL ACTIVITIES & CONTRIBUTION

CSA Group is a politically neutral organization and does not make political contributions anywhere in the world, whether in cash or in kind.

CSA Group employees have a right to engage in political activities on their own time and at their own expense. However, employees are not permitted to speak on behalf of CSA Group or give the impression that they are representing CSA Group in their personal political activities.

REGULATORY COMPLIANCE

Aspects of CSA Group's business are regulated and CSA Group is committed to complying with all applicable regulatory requirements, including those of its accreditation bodies.

WITNESS TESTIMONY

CSA Group may receive legal requests for documents or for testimony related to CSA Group business. It is CSA Group policy that employees may not testify as witnesses on behalf of CSA Group, except as authorized by the Executive Vice President, General Counsel & Corporate Secretary. Please forward any requests for testimony or documentation to the Executive Vice President, General Counsel & Corporate Secretary.

INTERNATIONAL BUSINESS DEALINGS

CSA Group is proud to have a global presence and to promote safety around the world. When operating in foreign countries, it is important to respect the customs, manners and cultures of these countries while complying with the local laws and regulations. For example, many countries have laws that govern business dealings in foreign countries, such as the FCPA. This legislation generally prohibits the bribing of foreign officials, either directly or indirectly or through a third party. The FCPA imposes criminal and civil liability on both individuals and organizations for violation of its anti-bribery provision. CSA Group may face significant penalties for violating the FCPA and other similar laws.

CSA Group complies with similar Canadian legislation including the Corruption of Foreign Public Officials Act (CFPOA) which implements Canada's international obligations under the OECD Anti-bribery Convention as well as the U.K. Bribery Act.

EXPORT COMPLIANCE

CSA Group provides services around the world and, therefore, is subject to international trade laws. Certain transfers of technology and technical information are restricted depending on the nature of the item, country of origin, destination, end use and end user. Transferring these technologies or information without the appropriate government licenses and permits can result in serious penalties for CSA Group and for individual employees. For more information, please contact the Executive Vice President, General Counsel & Corporate Secretary.

TRADE SANCTIONS

Before engaging in business with a company located in a foreign country, it is important to ensure that the company or its factories are not located in a country with which CSA Group is prohibited from doing business. Sanctioned and embargoed countries change from time to time so it is important to seek guidance from the Executive Vice President, General Counsel & Corporate Secretary before doing business in a new country.

DEALINGS WITH OTHER STANDARDS DEVELOPMENT & CERTIFICATION BODIES

CSA Group seeks competitive advantages through superior performance; never through unethical or illegal business practices. CSA Group is firmly committed to free and open competition and does not engage in any activities with competitors or suppliers that would restrict fair competition. Our commitments include treating customers, competitors and suppliers fairly and honestly and avoiding deceptive business practices.

ENVIRONMENTAL COMPLIANCE

CSA Group strives to be a leader for responsible environmental management and the conservation of resources and is firmly committed to the protection and sustainability of the environment. CSA Group, therefore, complies with applicable environmental laws, rules and regulations. In order to safeguard natural resources and promote a sustainable world, we are committed to being responsible environmental actors.

MAKING A POSITIVE DIFFERENCE IN OUR COMMUNITIES

CSA Group believes that good, corporate social responsibility provides for better communities and a better planet and it encourages the support of charitable, educational and community service activities. We promote corporate social responsibility by supporting select organizations. While we encourage our employees to take part in other charitable activities on a personal level, employees must obtain prior management approval if they wish to do so on company time or as a representative of CSA Group.

OUR VISION

“Create a better, safer, more sustainable
world where standards work for people &
business”



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