

SCS Anti-Corruption and Bribery Policy

SCS Global Services (SCS) is fully committed to complying with anti-bribery and corruption laws in every country in which it operates. No SCS employee, director, contractor, affiliate or subsidiary shall promise, offer or pay, whether directly or indirectly, anything of value to any person in order to obtain an unlawful or unethical benefit for SCS or its client (a “bribe”). No SCS employee, director, contractor, affiliate or subsidiary shall receive or solicit to receive payment of money, money equivalent, gifts, loans, hospitality, services, discounts or anything else of value from any person or company in connection with the performance of services on behalf of SCS other than the contractually established fee for services rendered and legitimate expenses to be reimbursed in connection with the performance of such services. Customary, small, token, infrequent gifts of nominal value that are not provided with any expectation of return favor fall outside the scope of this policy.

The promise, offer, solicitation, payment or acceptance of any bribe, or other act that would constitute a corrupt act or practice, is a violation of SCS policy and will result in appropriate disciplinary action, up to termination. For example, an SCS Auditor engages in a corrupt act or practice if the Auditor requests, solicits, or accepts a benefit (payment, service) from the Client as an inducement for the auditor to conduct the audit in a manner favorable to the Client. All SCS employees, directors, contractors, affiliates, and subsidiaries must report to the SCS VP of Global Quality Assurance any incident when a bribe is offered to them or solicited from them, or any other incident that the SCS personnel believes constitutes a corrupt act or practice. For example, a client offers a bribe when a client offers or gives some benefit to an SCS Auditor as an inducement for the auditor to not issue non-conformities, not visit some sites, or not interview certain workers.

Audit fraud is committed when an auditee/client alters documents or otherwise misrepresents evidence of compliance. A client committing audit fraud is in contractual noncompliance with SCS. SCS shall investigate instances of alleged fraud or fraudulent behavior in accordance with its investigation procedure and protect the identity of stakeholders should they wish to remain anonymous and/or to prevent retaliation. The client investigated for fraud is responsible for the cost of the investigation.

Stakeholders may contact SCS to report activities where corruption may be taking place via SCS’ website or via e-mail to: complaints@scscertified.com

Or to: 2000 Powell St., Ste. 600
Emeryville CA 94608 USA

For further information you may call: +1 510 452-8000

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Signature

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Name (block letters)

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Date