

It is the policy of QAI Laboratories (QAI) to maintain the Code of Ethics and Integrity as described in the QAI Quality Manual and Quality System Documents. We hereby certify that the Code of Ethics and Integrity as described herein is the core of the QAI culture and business practices.

It is our objective to inspire trust in all testing, inspection, and certification activities which QAI conducts business. We are the custodians of the QAI brand and reputation in the markets in which we operate. We strive to hold ourselves to the following Code of Ethics:

- The QAI Code of Ethics applies to all employees, officers, and directors of QAI. All aspects of the Code must also be adhered to by contractors, consultants, agents, subcontractors, and anyone acting on behalf of, or representing, QAI.
- It is the personal responsibility of each QAI employee to read and understand the Code and commit to upholding its principles.
- QAI shall provide guidance and support to all employees to help them understand the Code and to help them make the right decision when faced with an ethical dilemma.
- QAI ensures that no employee faces retaliation or adverse consequence for having sought advice or for having reported a violation of the Code. Any retaliation against a reporter of a violation will result in disciplinary action for the person(s) involved with the retaliation.
- QAI services will be undertaken professionally and honestly in accordance with agreed standards. QAI maintains its independence of judgment and does not surrender to pressure from internal or external influences to misrepresent its findings or alter the results of its inspections, testing, or certifications.
- All findings are accurately documented and shall not be changed improperly. All findings and opinions issued by QAI are supported by true and accurate documented information and reports maintained in accordance with QAI record control procedures.
- Information recorded in QAI financial records are fair and true, timely and accurate. All transactions shall be properly and accurately recorded and supported by proper documentation issued by bona fide parties.
- Employees will declare all real and potential Conflicts of Interest by the processes defined in the QAI Quality Management System.
- The following activities are forbidden to QAI Employees:
  - Personally offering or participating in any form of professional product consultancy services to a client or potential client of QAI that is in conflict with its accreditation. Product consultancy DOES NOT include advice given which:
    - is not a unique method of solving or resolving a problem but rather one of a number of well-known solutions;
    - is not based on someone else's proprietary information, such as a unique construction seen in a product of another client;
    - Is the advice that would be given to all clients, as may be applicable;
    - The client understands that it is the client's responsibility for choosing any specific service or design and ensuring that the design chosen complies with the requirements.
  - Competing with QAI or working for a competitor of QAI while employed by QAI.
  - Obtaining a personal gain, or procuring a personal gain for a close relative, friend or acquaintance, by abusing a position within QAI or accessing QAI information or information supplied by the clients.

- Engaging the services of a supplier or sub-contractor of QAI in which an employee or close relative directly or indirectly has a significant shareholding or other financial interest, unless:
  - the potential conflict has been disclosed and made transparent to QAI Management;
  - the employee affected does not partake in the procurement process.
- Making a personal investment in a supplier, sub-contractor, competitor or client of QAI unless by way of acquiring shares on a publicly traded stock exchange.
- QAI employees have a duty to safeguard company assets or resources under their control appropriately.
- Company computers, network systems and electronic communication tools must be used for professional services in accordance with QAI policies.
  - All data, information, and/or records, either electronic or hardcopy, obtained by an employee during their employment with QAI remains the sole intellectual property of QAI. Legal or punitive action may be taken in the event an employee deleted, mutilated, and/or damaged the intellectual property of QAI regardless of the intent. Tampering with the accessibility of any intellectual property of QAI, including encryption or other locking system, that result in inaccessibility for QAI may also be subject to legal or punitive damage.
  - The copying or saving of the intellectual property of QAI on an unapproved device, storage system, or storage site (whether through e-mailing or other personal third party service accounts, such as DropBox) is prohibited and may be subject to legal and punitive action. All data, information, and/or records, electronic or hard copy of the intellectual property of QAI must be returned to QAI upon severance of employment.
  - It is the responsibility of the employee to ensure proper management and security of the intellectual property of QAI while within employee's possession. Failure to reasonably secure the integrity and safeguarding of QAI property, electronic or physical, may be subject to disciplinary action, up to and including termination.
- QAI employees involved in purchasing of goods and services or selecting sub-contractors must do so with the sole aim of securing the best overall value, with due regard to supplier quality and reputation, for QAI.
- QAI does not engage in bribery or corruption of any form. Employees or anyone acting on behalf of QAI, must not offer or make payments to government officials, whether directly or indirectly, offer them any gift or entertainment with the aim of influencing their decision, or encourage them to secure an improper advantage for QAI.
- Any employee who receives a demand for a bribe must report the matter immediately to their direct line manager or to the QAI President.
- QAI does not pay or offer any form of incentive for directly securing business.
- QAI does not engage the services of third parties or other entities to offer bribes, illicit commission or kickbacks on its behalf.
- QAI does not use the services of intermediaries, agents, consultants, or contractors in cases where it is suspected that such entities may engage in corruption or illicit trade practices.
- QAI upholds a strict policy of neutrality in the political process of countries in which it operates. QAI shall not allocate or donate funds or resources to any political party, elected official, or candidate for elected office in any country, and do not support any political campaign.

- QAI does not support any religious organisation.
- QAI recognizes to be good neighbours in the communities where it operates it may from time-to-time be prudent to make charitable contributions or to promote employee involvement in charitable giving. Such charities may include, but not limited to, disaster relief agencies, food pantries, and other not-for-profit organizations. Such activities must be approved by QAI Executive Management.
- When QAI is involved in charitable giving or food drive efforts, no employee will be required to participate and no employee shall face retaliation for not participating in such activities.
- QAI recognizes the delicate situation that offering and accepting gifts has on normal business practices in relation to what is culturally acceptable, expected, and reasonable to ensure QAI, and its employees do not intentionally, or unintentionally, offend clients or suppliers. Therefore, QAI requires the following rules be followed by all QAI employees:
  - QAI Employees shall never accept or offer gifts intended to improperly influence, or create the appearance of improper influence on business decisions.
  - Gifts, hospitality, and entertainment shall not exceed what is usual in normal business practices.
  - Any form of entertainment that could be damaging to QAI's reputation shall be avoided.
  - QAI Employees must never accept payments of cash, tips, loans or cash equivalent gifts from suppliers or clients.
  - Employees are required to report and seek prior approval from a member of QAI Executive Management before accepting any gift in excess of \$100 US.
  - Employees accepting any gift, hospitality, or entertainment from clients are accepting them on behalf of QAI, its CEO and Executive Management. Gifts remain the property of QAI, unless management bestows the gift to the employee during normal business practices.
  - A personal gift offered by QAI to clients or business relations in excess of \$100 US requires approval from a member of QAI Executive Management.
  - Offering to pay for travel and accommodation of QAI clients to attend a QAI sponsored event or visiting a QAI facility requires prior approval of the QAI President, or if the QAI President is making such offers, the approval of the QAI CEO is required.
  - Employees involved in decisions of procurement or selection of suppliers must not accept personal gifts offered by suppliers or prospective suppliers. Usual hospitality and entertainment, including participation in trade fairs and similar professional events sponsored by suppliers, is acceptable, subject to reporting and approval obligations.
- QAI conducts its business using competitive and fair market practices. It does not engage in any understandings or agreements with competitors or partners with the intentional effect of biasing or improperly influencing the markets in which it operates.
- QAI does not market its services and capabilities in a deceptive way, and does not make disparaging or untruthful allegations regarding competitors.
- QAI does not allow any marketing or claims that testing, inspection, or certification would be simpler, easier, faster, or less expensive if a specified organization were used, to include those services offered by QAI.

- QAI does not obtain confidential information on competitors by using or soliciting illegal or unethical practices.
- All QAI employees are treated and evaluated solely on their job-related skills, qualifications, behaviour, and performance. QAI bases all aspects of the employment relationship on the principle of equal opportunity, regardless of race, colour, gender, religion, political affiliation, nationality, sexual orientation, social origin, age or disability. Discrimination based on these criteria is not tolerated.
- All forms of abuse, harassment and bullying is prohibited.
- QAI employees only those person(s) who have reached the legal age of majority as adults in the areas in which QAI operates.
- QAI respects and protects the confidential information entrusted by clients in the course of business and takes appropriate actions to prevent disclosure.
- QAI respects and protects the privacy and confidential information of its employees.
- Employees of QAI shall also maintain confidentiality of QAI client information and the information of fellow QAI employees.
- QAI complies with applicable laws in the countries where it operates. Employees are responsible for knowing the rules that apply to QAI and themselves and acting accordingly.
- When the Code or other relevant QAI policies impose more stringent requirements than those mandated by law or regulation, QAI employees shall follow the more stringent Code or policy.
- QAI employees are required to report violations or suspected violations of this Code without fear of retaliation.

This document represents the framework to assure conformance with applicable rules, procedures, acceptance criteria, and other applicable documents defined under the accreditation programs of the Standards Council of Canada, International Accreditation Service, and the Occupational and Safety Health Administration. It is intended to provide objective evidence that QAI conforms to contractual and regulatory requirements.



Kent Adamson, President



Steve Harris, CEO

**Reference Documents:**

Title	Number
QAI Quality Manual	QM0001

**Document History and Change Record:**

Date	Version	Change Description	Created by	Reviewed By	Approved by
07/31/2014	0	New Issue	JJohnson	LGibson	Steve Harris
09/09/2015	1	<p>Reformatted layout and font throughout.</p> <p>¶ 2-Removed "and our employees"</p> <p>Added "QAI Recognizes the delicate situation..."</p> <p>Grouped all gift offering and acceptance rules together to provide more clarity.</p> <p>Added "Employees accepting any gift..."</p> <p>Added "Employees involved in decisions of procurement..."</p> <p>Corrected grammatical and spelling errors throughout</p>	JJohnson	LGibson	Steve Harris
08/04/2016	2	<p>Added ¶ "All data, information, and/or records, either electronic or hardcopy, obtained by an employee during their employment with QAI remains the sole intellectual property of QAI..."</p> <p>Added ¶ "The copying or saving of the intellectual property of QAI on an unapproved device..."</p> <p>Added ¶ "It is the responsibility of the employee to ensure proper management and security of the intellectual property of QAI while within employee's possession..."</p>	JJohnson	K. Adamson	Steve Harris