

# Code of Conduct for the QS Scheme

**Compliance (last revised: 28.08.2012)**

Since it was launched in 2001, *QS. Quality scheme for food.* has become successfully established in the food sector. Today, the activities of QS in the market comprise the cross-stage coordination of standards for the production and marketing of food and the implementation of these standards by a growing number of scheme participants. In this process, it is the commitment of the industry and the credibility of its representatives that have made QS a strong organisation.

*QS. Quality scheme for food.* depends on trust in the performance and integrity of the scheme. This trust depends largely on the conduct of the employees and management personnel in the QS scheme.

With this Code of Conduct, QS defines the ethical and moral framework in which QS employees and management personnel want to act within the QS scheme and maintain trust in the scheme. It outlines fundamental principles and rules of conduct for joint work activities in the QS scheme and in dealings with scheme participants and the public at large. The objective is to prevent situations that can call the integrity of employees, management personnel and the QS scheme as a whole into question.

This Code of Conduct applies to the employees and management personnel of QS Qualität und Sicherheit GmbH, the QS-Fachgesellschaften companies, the certification bodies and laboratories as well as other service providers involved in the operation and implementation of the scheme.

This Code of Conduct does not apply to the employees and management personnel (hereafter called *employees* for short) of the companies who participate in the QS scheme as scheme participants in the production or marketing of food.

## **1. Integrity and compliance**

The employees in the QS scheme will comply with the laws applicable to their working environment as well as the rules and guidelines within the scheme. They will not allow themselves to be involved in illegal processes, nor will they tolerate illegal acts in connection with the QS scheme.

In their working environment, the employees in the QS scheme are duty-bound to behave honestly and fairly, with integrity and decency, and to avoid conflicts between private and business interests. They also take care not to damage the good reputation of the QS scheme through their actions in the private sphere.

## **2. Exclusion of all forms of discrimination**

Discrimination or harassment in the working environment, be it due to disability, gender, sexual orientation, skin colour, origin, language, age, religion, political opinion or physical appearance are not tolerated by the employees in the QS scheme.

## **3. Disclosure of conflicts of interest**

Conflicts of interest can raise doubts over the integrity of the QS scheme. Potential sources of conflict should therefore be identified and disclosed at the earliest possible stage. If a conflict of interest cannot be avoided, the employees in the QS scheme will take suitable measures to ensure objective and fair handling of the matter at hand.

## **4. No connection between private and job-related interests**

Consulting activities or secondary employment must not impair the integrity of the QS scheme and the employees active in the QS scheme.

Employees who hold or would like to acquire a material financial interest in a business enterprise will disclose this interest if it might result in a conflict of interest with their responsibilities in the QS scheme. This also applies if the financial interest is held or acquired by a person with whom they have a close relationship (such as their spouse, registered civil partner or dependent children).

If employees receive fees or other benefits for presentations, publications or public appearances in connection with their employment in the QS system, they will also disclose these payments and benefits in a suitable manner.

## **5. No corruption**

The employees in the QS scheme do not tolerate any kind of corruption. If situations arise that do not constitute corruption as such but that may call their ability to make objective judgements into question, they will take the following into consideration in their conduct:

- 5.1 Up to a certain degree, presents, benefits or invitations from business partners are compatible with standard business practices. They can, however, lead to conflicts of interest and call the integrity of the QS scheme as well as the employees in the QS scheme into question. The employees in the QS scheme will therefore not accept any presents, benefits or invitations if they could negatively impact the interests of the QS scheme or pose a risk to the independence of employees. Employees will always refuse to accept monetary benefits (such as cash, money transfers, loans, unjustified credits) or items of value of any kind. In the case of invitations to events that are not primarily of a business nature - such as theatre performances, concerts and sporting events or conferences and seminars with programmes that are chiefly geared towards entertainment - employees in the QS scheme will make a judgement as to whether their participation in the event is in keeping with standard business practices. The criteria for this are that such participation does not occur on a frequent basis, that travel or logistics expenses are not borne by the business associate extending the invitation and that the host is also present at the event.
- 5.2 Up to a certain degree, the giving of presents, benefits or invitations is a means of developing or cementing business relationships and is in line with standard business practices. It can, however, call the independence of employees into question. The employees in the QS scheme will take care to avoid even the appearance of conflicts of interest or the possibility of damage to the reputation of the QS scheme. In particular, they will not give any presents, benefits or invitations with the intention of obtaining an improper business advantage. They will ensure maximum transparency when giving presents, benefits or invitations. The employees in the QS system will not grant any monetary benefits. Officials - including civil servants or public service employees, delegates or candidates for public office, representatives of political parties, representatives of international organisations, companies owned by the state or one of its authorities, private persons exercising public functions and persons in comparable positions - may only receive presents, benefits or invitations that do not call into question the appropriate respect for the public office and its independence with regard to business interests.
- 5.3 Donations to political and non-profit organisations may only be made within the framework of the respective legal system.

## **6. Protection of confidential data**

The protection of confidential data and in particular compliance with the relevant data protection regulations form an important basis for trust-based cooperation in the QS scheme. The employees in the QS scheme will protect confidential data, in particular data collected in the QS scheme, and will always take suitable measures to safeguard this data against access by unauthorised third parties.

## **7. Appropriate communication**

The employees in the QS scheme will take care to ensure that their statements regarding the QS scheme are always balanced, appropriate, accurate and comprehensible.

Where they act as representatives of the scheme or participate in an event in such a way that they might be perceived as representatives of the QS scheme, the type and content of any statements they make will always be based on this Code of Conduct.

This Code of Conduct for the QS scheme came into effect on 28 August 2012 by resolution of the shareholders' meeting of QS Qualität und Sicherheit GmbH.

Upon submission of a declaration of consent, the Code of Conduct becomes the personal code of conduct for employees in the QS scheme. The declaration of consent can be submitted using the attached form or in other suitable manner – as part of a contractual agreement, for example.

Bonn, 28. August 2012

QS Qualität und Sicherheit GmbH