

## Code of Ethics

This Code of Ethics applies to all ELEVATE employees and contractors. We call this wider team our “Associates.” This Code is designed to support the effective, transparent and rigorous delivery of all ELEVATE products and services in all countries worldwide. As the assessors, advisors and partners of client sustainability programs, it is our responsibility to ensure integrity and ethics are an integral part of everything we do.

The following sections outline our collective commitment to exceptional ethical conduct in our “ways of working” and across our value chain. Violations of this Code of Ethics **are not tolerated**.

### Illegal payments & gifts

- ELEVATE Associates must never offer or accept bribes or commissions and must not participate in or facilitate corruption activities of any kind.
- No matter the benefit is received or not at last, in order to avoid any unnecessary dispute, Associates must stop to get involved into any discussion related to 'benefit'. Associates must only drive firmly the conversation to requirements of ELEVATE Code of Ethics & Integrity Policy. Associates found to be soliciting or accepting any commission, payment, gift, service, favor or any other benefit related to their work from a client will be in breach of their contract under terms of gross misconduct. This is grounds for immediate dismissal within the confines of the law.
- In validated cases of gross misconduct, the ELEVATE policy is to commence criminal and / or civil proceedings as deemed appropriate.
- In event of any confirmed violation of Code of Ethics, Integrity Policy, and / or all professional requirements provisioned at Employee Handbook, ELEVATE will file a report to APSCA as deemed appropriate.
- Any argument that the receipt of benefit was not understood as being in breach of this policy will **NOT** be accepted. If, after reading and acknowledging this Code of Ethics, ELEVATE Associates remain in doubt, it is their responsibility to ask for clarification from their supervisor.

### Guidance for external interaction

#### **Who is offering the bribe / gift?**

Any gift or benefit, received or offered, from or to a vendor, factory, or any other party doing business with ELEVATE or any of its clients should be questioned. Such gifts or benefits offered or provided must be immediately reported / disclosed to the appropriate supervisor and / or recorded via the EthicsPoint hotline.

#### **What is the nature of the benefit / gift?**

Benefits may take many forms. Some not always obvious. Acceptance of any of the following is always strictly forbidden.

- Money or physical gifts (e.g. jewelry, items of commercial value) of any form
- Merchandise including sample of products, mobile phones, laptops, electronic gadgets and accessories
- Paid lodging of any kind, including vacations
- Paid transport including air-tickets, railway tickets, boat tickets
- Gambling tokens, meal tokens, discount coupons
- Entertainment involving nightclubs, hostess clubs, or gambling
- Loans of any kind, including loans to family members
- Any ownership or other beneficial interest in any vendor, factory, or entity that receives compensation from ELEVATE or its clients. Said ownership restriction extends to any family member
- Employees may not enter into any other paid employment without prior written authorization of ELEVATE

The following benefits may at times be accepted, subject to ELEVATE management’s approval and authorization:

- Meals offered by worksite management that come from the factory cafeteria. It is ELEVATE’s policy that all Associates should pay for their own meals when on ELEVATE business and claim in accordance with ELEVATE expense allowances. If meals offered by worksite management in social compliance service, Associates must pay for their portion as far as practicable and in such cases, retain a receipt if possible.
- Ground transportation provided by vendors / factories to visit remote and / or inaccessible worksite locations or locations to which the use of public transport is not deemed prudent for reasons of safety may be accepted. However, if possible, pre-approval from the appropriate supervisor must be sought.

## Guidance for internal interaction

ELEVATE values its Associates above all else and is committed to empowering these representatives with the tools and support to conduct their jobs effectively. We work together as one team representing ELEVATE to our clients. ELEVATE Associates are placed in positions of trust and power which must not be abused, disrespected or dishonored.

The following are guidelines for internal ethical practice.

- Honesty and transparency must be practiced at all times
- No confidential ELEVATE or client information must ever be revealed to third parties
- All Associates must respect the workplace and private property of their colleagues
- No Associates may enter the private working domain of others (desktop, desk drawers, email, and computer documents) without the expressed permission from ELEVATE
- No employee should withhold knowledge where the withholding of that knowledge will allow another employee to fail or otherwise suffer individual harm
- ELEVATE property must never be taken for personal use

## Reporting unethical practices

Our EthicsPoint hotline enables any person to report possible illegal, unethical or improper conduct of any Associate either through a secure website or a toll-free multilingual hotline. Callers may choose to remain anonymous. Those who choose to leave their name will have their identity protected to the extent provided by law. Please ensure you either have access to the website at [www.elevate.ethicspoint.com](http://www.elevate.ethicspoint.com) or have the appropriate local telephone number for your country available at all times.

All knowledge of any ELEVATE Associate soliciting, discussing, or accepting any payments, gifts, fees or compensation of any kind, should be reported to your regional management representatives directly or via the hotline within 24 hours. Failure to report this information may result in you being seen as complicit in such activities and will be subject to disciplinary actions.

## Conflict of interest

No Associates or any of their relatives may have any financial interest, direct or indirect, in any business which competes with ELEVATE or with which ELEVATE has business dealings, unless that interest and/or relationship has been declared to ELEVATE and a written waiver received from the Head of Global Quality and Integrity. ELEVATE shall not conduct social compliance services when ELEVATE Associates have a business interest in the outcome of the service. This includes, but is not limited to, fees or other business contingent on the outcome of the service.

Social compliance services shall be undertaken independently. All ELEVATE Associates who could influence social compliance services shall act independently and shall not allow commercial, financial, or other pressures to compromise their independence and service delivery quality.

## Additional information

Disclosure	Public
Version No.	V3.0
Date of Publication	7 May 2021
Date of Last Review	7 May 2021
Approved by	Ian Spaulding, CEO