



TIC Quality Control Pvt. Ltd. CONFIDENTIALITY AND ETHICAL CONDUCT

1.0 Purpose

The policy establishes TICQC's expectation to uphold its rigorous standards of integrity, confidentiality, and accountability, as well as to ensure transparency in its certification and organizational operations. It encompasses TICQC's management, committees, board members, employees, relationships, and individuals who act on behalf of the company to ensure compliance with this policy. TICQC endeavours to operate its business in a manner that is both ethical and transparent, and that is consistent with all relevant local, national, and international laws and regulations.

2.0 Responsibilities

Top management, quality manager, and scheme product manager are responsible for the proper implementation of this policy. This policy shall cover all TICQC's personnel and clients.

3.0 References:

- ISO/IEC 17065, Conformity Assessment - Requirements for bodies certifying Products, Processes and services.
- ISO/IEC 17021-1, Conformity Assessment — Requirements for bodies Providing audit and Certification of Management Systems.
- ISO/IEC 17000, Conformity Assessment — Vocabulary and general principles.
- ISO/IEC 17020, Conformity Assessment— Requirements for the operation of various types of bodies performing inspection.
- ISO/IEC 17025, General requirements for the competence of testing and calibration laboratories.
- All controlled QMS records-Please refer to TIC-QP-11/F01 - Document Master List.

4.0 Abbreviations

QAM: Quality Manager
P: Quality Procedures
MR: Management Representative
QM: Quality Manual
QMS: Quality Management System
SOP: Standard Operating Procedure
DML: Document Master List
F: Format

5.0 Confidentiality

- I. TIC QC personnel are required to give importance to the interests of TICQC and refrain from engaging in any interactions with related service partners that may appear to conflict with those of TICQC This includes, but is not restricted to, the provision of payments, employment or business opportunities, or other Favors to any TICQC employees, including their families (immediate blood relations, spouse, and close relatives), by any related service partners.
- II. TIC QC will treat it as a conflict of interest if its personnel have a financial interest in the applicant's production or handling operation or have provided consulting services to the application within 2 years of certification.



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- III. The staff members/freelancers who are involved in the certification process are required to sign a contract that guarantees confidentiality, impartiality, and adherence to TICQC's Integrated Management System (IMS). He/She shall sign a “*Declaration of impartiality and confidentiality and conflict of Interest*” (TIC-MIC-01) and Confidential and *Non-Disclosure Agreement* (TIC-AG-02) at the start of employment/contract activities and annually.
- IV. TIC QC personal shall not during the term of this contract and for a period of 5 year after the expiration or termination of this contract for any reason, directly or indirectly to be employed by another notified body or to engage in services done by or to another notified body TIC QC responsible to monitor the implementation of these conditions during and after the employment or to ensure/remind that the employee is aware of its commitment to safeguard the confidentiality or impartiality either during or after the employment. Any allege breach to confidentiality or risk to impartiality or any unethical issues which are equivalent to breach of confidentiality and impartiality shall be reported to relevant scheme owner.
- V. Information obtained during the certification process, as well as knowledge and information generated by, originating from, or associated with TICQC, are considered privileged and highly confidential under the Conflict-of-Interest Agreement and Disclosure. All personnel/contractors/freelances/committees and subcontractors are mandated by confidentiality
- VI. TICQC is responsible for managing all information acquired or generated during certification activities, except for client-public information or shared information agreed upon with the client for complaint responses. This responsibility will be achieved through legally enforceable commitments.
- VII. TIC QC provides the client with advance notification of the information it intends to publish in the public domain. The TICQC will inform the client that it is required to provide information to the Scheme Owner or accreditation body. In this respect, TICQC has a clause in the certification agreement (TIC-AG-01) with Client that serves as the client's written consent.
- VIII. When TIC QC is required by law or authorized by contractual arrangements to release confidential information, the client or person concerned will be notified of the information provided.
- IX. TIC QC has arrangements to secure information through:
 - restricted access to the files stored in the certification section;
 - All computers used by officers have passwords to avoid unauthorized access.
 - All cabinets containing files and information are kept under lock and key.
- X. In compliance with the regulations, TICQC, provides the requisite security in the required amount and under the circumstances mandated by law or regulation to protect the rights of production and handling operations that have been authorised by it.

6.0 Ethical Conduct

- I. **TICQC considers the following offences to be Unethical.**
 - a) Providing, promising, or offering a bribe to compensate an individual for performing a pertinent function in an improper manner
 - b) Requesting, agreeing to accept, or receiving a bribe as a reward for improperly conducting a relevant function
 - c) TICQC does not distinguish between bribes offered, promised, or given directly or indirectly. Furthermore, it makes no difference whether an employee, or agent requesting, agreeing to accept, or receiving the bribe is aware of or believes that the



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function will be performed improperly, or whether this person asks another person to perform the improper function on their behalf.

II. Ethical Policy Management

In the context of this policy management is applicable to personnel, Subcontractors, committees, organization that TIC QC might use during its certification procedures.

- a. In order to gain or keep TIC QC business, a client, business partner, or any third-party person or company may not offer incentives or engage in any kind of commercial bribery. The local, national, international, or otherwise applicable rules and regulations pertaining to the bribing of public officials must be followed by employees and agents.
- b. Is not permitted to give, promise to give, or offer a cash, gift, or hospitality in the hope of receiving a business benefit or in order to reward one that has already been granted;
- c. Will not accept payment from a third party that is known or suspected to be offered with the expectation that it will obtain a business advantage for them;
- d. Will not accept a gift or hospitality from a third party if it is known or suspected that it is offered with the expectation that TICQC will provide a business advantage in return;
- e. Must not have any un-reported business relationship with any enterprise that supplies, benefits from, or competes with TIC QC
- f. Not have any business relationship with TIC QC Customers.
- g. An employee must disclose the particulars of any material interest(s) of which he or she is aware relating to : Any commission or fee, or any other benefit or advantage, whether monetary or not, direct or indirect, that the person giving the advice, or an associate has, will or may receive in connection with the advice; and Any other monetary or other interest, whether direct or indirect, of the person giving the advice or an associate, that may be capable of influencing the representative.
- h. Non-disclosure is a breach of the law. If disclosure should have been made and wasn't made, the person giving the advice is directly liable for any damages or losses suffered as a consequence of the client acting on the original advice.
- i. From time-to-time Employees may be offered gifts, benefits or corporate entertainment. These gifts or benefits may influence or could give rise to a sense of obligation, which may conflict with their duties to TIC QC or our other clients and
- j. At no time should any Employee give or receive any gift/benefit or accept an invitation that would in any way cause TIC QC embarrassment (e.g. attending adult entertainment venues with a client or potential client) or do anything that could alter the employees' member's performance of his or her duties or influence decisions.
- k. Under no circumstances should employees accept any invitations to events other than lunch or breakfast research / company briefings, from an organization that is tendering for TIC QC business.
- l. If employees are unsure of their position in this regard, they should consult their direct Manager or Quality Manager before attending the briefing.
- m. TIC QC recognizes that there are certain circumstances where the giving or receiving of nominal gifts by employees may be acceptable where the value or the nature of the gift would not be regarded by an observer as improper.
- n. If employees are unsure of their position in this regard, they should consult their direct Manager or Quality Manager before attending the briefing.



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- o. TIC QC recognizes that there are certain circumstances where the giving or receiving of nominal gifts by employees may be acceptable where the value or the nature of the gift would not be regarded by an observer as improper.

III. Breach of ethical Policy:

Any violation of the Ethical policy may result in harsh disciplinary action, such as the immediate termination of the offending personnel and the termination of a service partnership contract related to sales. If a service partner violates any of the following policies, TICQC retains the right to end their partnership and to pursue additional legal action against them for damages and other expenses (such as legal fees).



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Revision History

The following is a summary of the recent revisions to this document.

Date	Revision No.	Amended By	Description of Changes