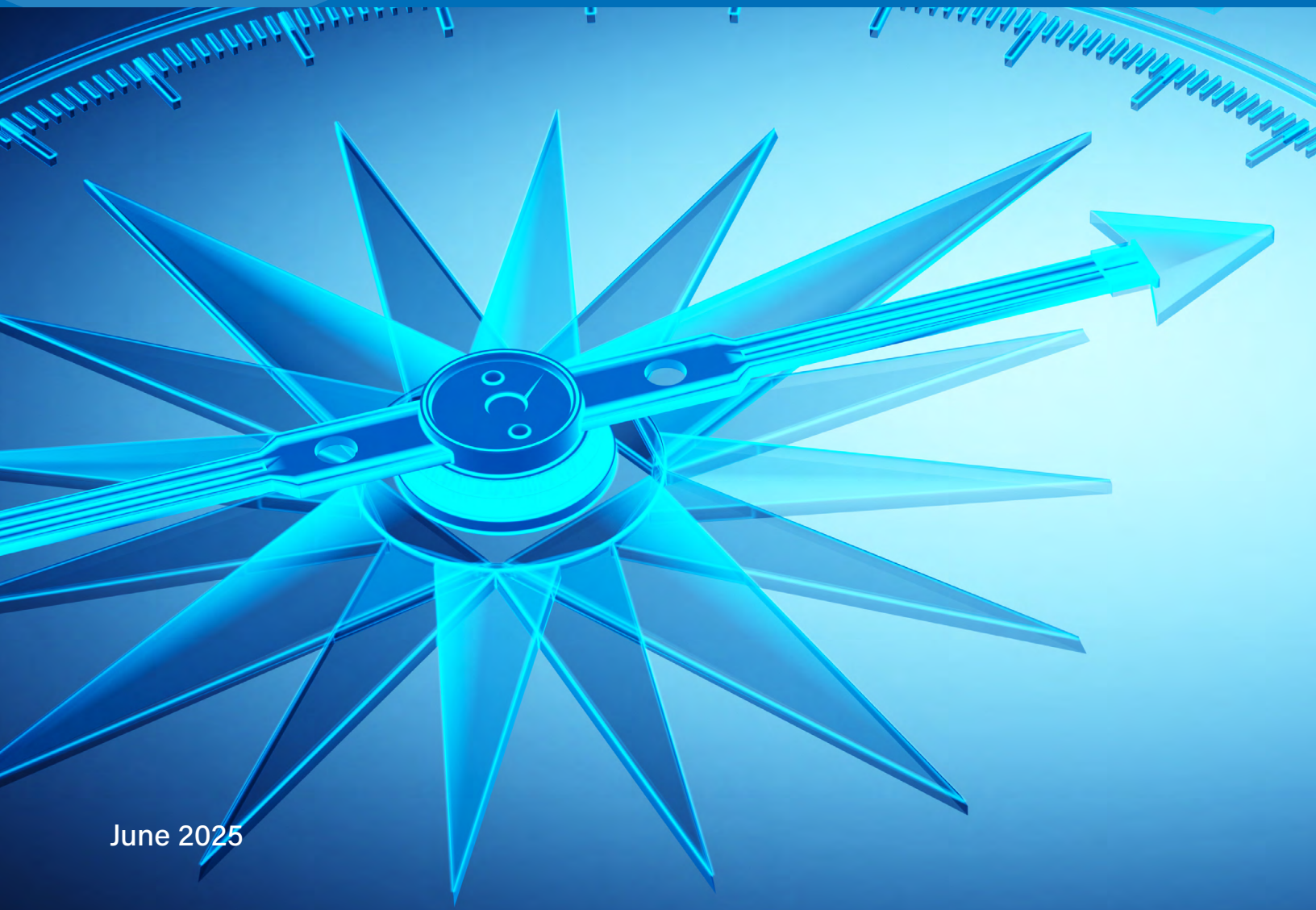
CSA GROUP

Code of Conduct



June 2025

A Message from the President & CEO

A strong commitment to ethics has been an integral part of CSA Group's success for over a century. There is an ethics dimension at the core of our mission, which for our Standards organization is to enhance people's lives through the advancement of standards in the public and private sectors. We are proud to be a leader in standards development, research, education, and advocacy. Our standards make a positive impact every day and help support the quality and safety of innumerable services, products, and systems at home, at work, and at play.

CSA Group's global commercial subsidiaries contribute meaningfully to the public good by providing expert testing, inspection, and certification services that enable manufacturers to demonstrate that their products comply with applicable safety, environmental, and operating performance standards in markets around the world.

This Code of Conduct and a range of compliance policies, procedures, and trainings, outline the principles that guide decision-making and workplace behaviour at all levels of our global organization. Adherence to the Code ensures that we operate lawfully and fairly and demonstrates our support for honest and sustainable trade.

All employees are required to read and adhere to the Code of Conduct. Employees will also be asked to formally acknowledge that they have read and understood its requirements. By adhering to high standards of ethical conduct, we maintain a positive and safe workplace for employees, foster trust in our brand, and enable sustainable business innovation – all of which will support our continued success for decades more.

Sincerely,



David Weinstein
President & CEO, CSA Group

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About the Code



A.1 What is it?

The Code of Conduct ("Code") outlines principles and guidelines for ethical behaviour consistent with CSA Group's core values. The Code provides guidance on how to conduct yourself in all your business dealings and indicates where to find more information when faced with ethical issues. The Code is managed by the Chief Legal, Ethics and Compliance Officer (CLECO), authorized by the Board of Directors and is reviewed annually.

A.2 Who does it apply to?

This Code applies to all employees and directors of CSA Group, including all full-time and part-time employees (both temporary and permanent). You are required to complete annual training and acknowledge that you have read, understood and are in compliance with the Code. Intermediaries, agents, joint venture partners, and third party suppliers and independent contractors with whom you do business should be made aware of the Code and its principles and applicable provisions. Third party suppliers and independent contractors will comply with the Supplier Code of Conduct which is based on the Code principles but is specific to the services they are providing. The Code also applies to CSA Group volunteers: (i) when engaged in CSA Group activities and (ii) when there are no other applicable CSA Group Policies applying to the volunteers which cover any of the topics under this Code.

A.3 How do I use it?

The Code is an integral part of our Business Integrity Training Program and is intended to be used as a reference guide for ethical conduct. While the Code cannot cover every issue that you may face, it does establish a clear set of principles for you to follow in any situation. In addition to using common sense, the following Ethical Decision Tree presents key questions to ask when faced with decisions relating to your ethical conduct:

- Is it legal?
- Does it comply with CSA Group policies?
- Is it consistent with CSA Group values?
- Will it negatively impact our employees, customers, members or stakeholders?
- Does it benefit CSA Group as a whole, not just certain individuals?
- Have I spoken to the right people about any questions or concerns I may have?

A.4 Where do I go for help?

If you have any questions or concerns regarding the Code, please speak with your manager. If you are not comfortable talking to your manager, please contact an HR representative, the CLECO or Legal & Compliance. If you would like to request an exception to a specific Code provision, you must first discuss your request with your manager, who must then request written approval from the CLECO or approved designate.

A.5 How do I report a violation?

Consistent with our core values, each of us has an obligation to report any known or suspected violations of the Code as well as any violations of laws, regulations or company policies.

Violations of the Code may result in disciplinary action up to and including termination for cause, without notice or pay in lieu of notice, in addition to possible civil, criminal, or regulatory action. All reports will be treated with the utmost care and sensitivity. No one may suspend, discharge, discriminate against, harass, threaten in any manner, or otherwise retaliate against you for reporting a violation in good faith, or for assisting with an internal or external investigation of a violation. If you believe that you are being retaliated against as a result of reporting a known or suspected violation of the Code or a CSA Group policy, or for assisting in an investigation, you should immediately contact one of the following:

- Your Manager (or their Manager)
- HR representative
- Chief Ethics & Compliance Officer (CECO)
- Legal Counsel
- Member of the Executive Leadership Team
- EthicsPoint Helpline

EthicsPoint is a confidential tool to report fraud, abuse and other misconduct in the workplace. Reports into the EthicsPoint Helpline can be made anonymously.

The EthicsPoint Helpline service is available 24 hours a day, 365 days a year and can be accessed through the toll-free telephone number or website listed below:

Online: www.csa.ethicspoint.com

Scenario

Is my protection from retaliation only available if I report my concerns through the EthicsPoint Helpline?

Retaliation is unacceptable no matter how you report your concern. If you believe you are being retaliated against, report your concern to the CLECO or through the EthicsPoint Helpline.

Toll-Free Numbers:

Canada	1-855-212-7615
Canada (French)	1-855-350-9393
China (Southern)	4001200349
China (Northern)	4001200349
Germany	0800 1816365
India	022 5017 0396
Italy	800 974 750
Japan	0800-1239345
Korea	00744920
Mexico	800 872 1796
Netherlands	0800 3510020
Singapore	800 852 3075
Taiwan	00801-49-2157
UK	0808 196 8072
U.S.	1-855-212-7615

Our Mission

B.1 Not-for-Profit Standards Development

The mission of CSA Group's Standard Development organization is to enhance the lives of Canadians through the advancement of standards in the public and private sectors. We are a leader in standards research, development, education, and advocacy. The technical and management standards developed with our more than 11,000 members improve safety, health, the environment, and economic efficiency in Canada and beyond.

B.2 Global Testing, Inspection & Certification

CSA Group's commercial subsidiaries provide expert testing, inspection, and certification services that enable manufacturers to demonstrate that their products are in compliance with applicable safety, environmental, and operating performance standards for markets around the world.

We offer deep expertise and industry-leading service delivery across a wide range of current and emerging technologies.

Integrity in the Organization & Around the World

C.1 Acting Ethically & Complying with the Law

Preserving trust and acting ethically are at the core of our organization. Failing to follow the Code, or comply with laws, risks exposing us to serious financial and reputational harm. You have an obligation to act honestly and with integrity at all times, which includes complying with the Code and all applicable laws and regulations.

You must not knowlingly or indirectly engage in, facilitate or benefit from any illegal transaction or activity.

C.2 Respectful Workplace

A respectful workplace positively impacts employee mental and physical health and safety which supports our overall commitment to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion (DEI). CSA Group is committed to a culture that incorporates courtesy, consideration, and compassion and which actively respects individuals by promoting trust and acceptance in the workplace. It is an approach that eliminates bullying, harassing and discriminatory behaviours in the workplace. A respectful workplace is one where all employees are treated fairly, act professionally, difference is acknowledged and valued, communication is open, conflict is addressed early and there is a culture of empowerment and cooperation. It includes courtesy, tolerance, and respect for other points of view.

C.3 Diversity, Equity & Inclusion; Accessibility

We value and respect the diversity of our organization and customers. We are committed to providing an environment of mutual respect and fairness free from discrimination based on age, sex, gender, gender identity and expression, sexual orientation, ethnicity, nationality, family and marital status, religion, belief and association, social and economic background, political backgrounds, veteran status, education, experience, disability, any other applicable legislatively prohibited grounds or any other characteristics that make individuals unique.

We are also committed to creating an accessible workplace for people with disabilities based on the principles of dignity, independence, integration and equal opportunity.

For additional information, please refer to our Diversity & Inclusion Policy and our Accessibility Policy

C.4 Conflict of Interest

Conflicts of interest arise when individuals or organizations have personal interests that may interfere with, or appear to interfere with, the independent exercise of judgment in business dealings. We must avoid having our decisions on behalf of CSA Group influenced, or to even be seen to be influenced, by conflicting interests. In addition to normal conflict of interest requirements; our organization holds accreditations which require more stringent standards of impartiality.

For these reasons, actual, potential and perceived conflicts of interest must be carefully managed. In any situation where there is a potential conflict, it must be brought to the attention of your manager or CLECO.

Conflicts of interest, whether actual, potential or perceived, must be disclosed to your manager immediately prior to engaging in the activities or transactions that could put you in conflict.

Scenario

There is a company that I deal with as part of my role as a Certifier. They asked me if I know of any engineer that they can hire. I know someone who would be qualified for the role. Can I refer this person to this position?

Yes, as long as that person goes through the appropriate hiring process when applying for the role.

C.5 Gifts & Entertainment

Offering and accepting business gifts and entertainment of any value is discouraged. Where required as a customary business courtesy, you must ensure that the gifts and entertainment you give and receive do not influence or undermine your business judgement on behalf of CSA Group or that of another party. In any event, gifts given or received with a value of over $100 (or local currency equivalent) are prohibited without the express approval of the CLECO.

Any gift given or received must be registered on our Gift Registry Form here.

Always avoid gifts and entertainment that appear to be bribes or raise questions about conflicts of interest for you or CSA Group.

Employees should ensure the gift or entertainment:

- Is consistent with reasonable and customary regional business practices;
- Is consistent with the organization's values;
- Cannot be perceived as a bribe or improper payment;
- Is not offered to improperly influence a business relationship;
- Does not violate applicable laws or ethical standards; or
- Would not embarrass the organization or the employee if publicly disclosed.

You must exercise particular care and due diligence when offering any business courtesy to government officials, as they are subject to stricter rules, regulations and laws. To determine the acceptable levels and practices in a specific jurisdiction with respect to engaging government officials, please consult with Legal & Compliance.

If you have concerns about giving or receiving something of value in the course of performing your duties, please contact your manager or the CLECO.

Scenario

A vendor that we are evaluating to provide IT services has asked the team to join them for a theatre show and dinner.

No. Accepting a gift or entertainment like this might be perceived as influencing the team's selection decision.

C.6 Bribery, Corruption & Fraud

As a global organization, we require all our employees, members, suppliers and agents to comply with applicable anti-bribery and anti-corruption laws and best practices regardless of cultural norms in different jurisdictions. Bribes, facilitation payments and kickbacks in any form will not be tolerated and are subject to potential criminal prosecution. Participation in these activities will result in disciplinary action, including termination of employment and potential criminal prosecution. We will also not tolerate or retain third parties that engage in corrupt practices on our behalf.

Under no circumstances are you to directly or indirectly bribe, or attempt to bribe, any party, including a public official, employee or associate. This includes political candidates, their relatives or employees of businesses that are owned directly or indirectly by governments or government agencies. You may not give or accept gifts or favours from any third party, regardless of their perceived value, in exchange for any type of favourable treatment. Bribes and kickbacks can include cash, fees, commissions, credits, gifts, and services in-kind. For additional guidance on CSA Group's governing antibribery and anti-corruption requirements, please refer to our Lobbying and Anti-Bribery policies. For additional information on giving and receiving gifts, please refer to the "Gifts & Entertainment" section of this document.

Scenario

In my role as a Field Inspector, what do I do if my contact at a factory offers me a 'personal payment' to ensure the inspection goes well?

Advise your contact that CSA Group does not accept these types of payments under any circumstances and immediately report this incident to your manager.

C.7 Directorships

You may not engage in any outside activities, including part-time employment or membership on a board of directors, without prior written consent of your manager. External board of director appointments must also be approved in advance by the CLECO. Already existing positions or appointments should be disclosed to the CLECO for information purposes. You may not hold a position with a competitor or client or acquire an interest in a supplier, client or competitor, with the exception of investments made on a public stock exchange where you do not exercise significant influence over the supplier, client or competitor. If you are uncertain as to whether your outside activities could put you in a conflict position, please discuss with your manager or the CLECO. All memberships or associations must be registered on our Board and Association Registration Form here.

Scenario

I have sat on a Board of Directors of a not-for-profit organization for many years. Can I keep my Board position?

You should contact the CLECO to ensure that there are no conflicts of interest between CSA Group and this organization.

C.8 Political Contributions

We are a politically neutral organization and do not make political contributions anywhere in the world, whether in cash or in-kind (i.e. providing services in lieu of cash), nor do we endorse political parties. You have a right to engage in political activities on your own time and at your own expense provided that you don't speak on behalf of CSA Group or give the impression that you are representing CSA Group. For more information, please refer to the Government and Industry Relations policy.

C.9 Fair Competition

We compete for business fairly and honestly in accordance with applicable antitrust laws and gain competitive advantage through technical expertise and superior performance. We are firmly committed to free and open competition and do not engage in any activities with competitors or suppliers that would restrict fair competition. We do not exaggerate, mislead, omit or falsify information in any marketing materials, nor do we criticize or misrepresent the qualifications or services of our competitors. We will not favour or promote the services or products of one company over another, except where public safety may be at issue.

C.10 Lobbying

As part of our global business activities, CSA Group may engage in authorized lobbying activities. You are required to seek approval and report all lobbying activities to the Chief Legal, Ethics & Compliance Officer or their designate. Please report your lobbying activities here.

C.11 Charitable Donations

Any charitable donations made on behalf of CSA Group are evaluated to ensure alignment with CSA Group's strategy, compliance to our Code and with clear definition that the donation does not support illegal activity or provide benefit to government officials or their families.

C.12 Media Relations

Public statements, including disclosures to the media or the general public, must be consistent and accurate, and representative of the organization's position. Please direct all media inquiries to communications@csagroup.org. You are not permitted to communicate with the media or publish any information regarding our business, even incidentally without express permission from the Corporate Communications team.

Social media accounts in the name of CSA Group are considered the property of CSA Group and should not be created or deleted without permission. For more information, please refer to the Global Corporate Communications policy.



C.13 Social Media Posts

All CSA Group Employees are ambassadors of the organization and are responsible for conducting themselves with the highest level of professionalism when using all CSA Group internal and external communications channels (including digital and social media) and all public social media platforms (including LinkedIn, YouTube, Twitter and Facebook). You are encouraged to maintain an online personal image that is coherent with your professional image. Anything you say or do on social media, even on a personal level, can implicate CSA Group. CSA Connect is our internal platform used to share company information and engage employees in conversation. Employees must keep the Code in mind when posting comments or content on CSA Connect.

C.14 Intellectual Property

You are responsible for protecting our intellectual property which includes, trademarks, copyrights, patents, graphics, multimedia and written materials. Our certification mark is one of our greatest assets and we employ a zero tolerance policy with respect to its unauthorized use. You are required to immediately report any known infringements or counterfeit use of our certification mark or other intellectual property to Legal & Compliance.

C.15 Technology & Company Assets

We provide you with access to electronic and computer technology for the purpose of company business. The information created, received, stored, or disseminated through these systems is not private and authorized company representatives may monitor these systems without notice. You are expected to safeguard all company assets and use them responsibly.

Only CSA Group approved devices (such as computers, laptops, tablets), software or generative artificial intelligence tools or solutions ("AI") must be used to process CSA Group information. You must only use electronic messaging channels approved and provided by CSA Group. The use of personal email is prohibited when communicating to customers or members; or for the storage of company related files and data.

You must comply with CSA Group policies and any terms and conditions governing the use of CSA Group equipment, systems, computer networks, software, AI, computers, and portable devices, as well as the information communicated within them.

You must not use these systems to view or communicate inappropriate material. These systems also must not be used to do work on behalf of another business or organization, unless authorized by CSA Group.

C.16 Information Security

You must remain alert to external security threats to CSA Group information and the information entrusted to us. You must comply with CSA Group information security policies, and follow information security best practices in the workplace and when working off-site. When using information resources, always act responsibly to protect CSA Group from intruders seeking to breach our information systems. Retain and dispose of information in the correct manner. Immediately report to CSA Group any actual or suspected data breach, or any information security concern.

C.17 Export Compliance

As a global organization, we are subject to various countries' international trade laws. Certain transfers of technology and technical information are restricted depending on the nature of the item, country of origin, destination, end use and end user. Transferring these technologies or information without the appropriate government licenses and permits can result in serious penalties for you and the organization. For more information, please contact the Chief Legal, Ethics & Compliance Officer. Also, our customers and suppliers are expected not to violate any export or trade law or other economic sanctions.

C.18 Trade Sanctions

Before engaging in business with a company located abroad, it is important to ensure that the organization and its factories are not located in a country; participating in an industry; or owned by an individual subject to trade sanctions. Sanctioned or embargoed countries, activities and individuals change from time to time so it is important to regularly seek guidance from your manager or the Chief Legal, Ethics & Compliance Officer. We expect the same behavior of our customers and suppliers.

Scenario

I have come across a Service Agreement for a new customer. The customer is located in a country that I believe we are prohibited from doing business with. What should I do?

Advise your manager immediately and contact Legal & Compliance for more information on any trade sanctions that may apply.

C.19 Compliance with Labour & Child Protection Laws

In addition to full compliance with all applicable labour and employment laws, CSA Group commits itself to upholding the human rights of workers, to prohibit and refrain from any kind of forced or child labour and treating employees with dignity and respect. We expect this of our customers and suppliers.

It is important to ensure that suppliers and contractors:

- Respect and comply with the fundamental rights granted to all employees and apply at a minimum the labour standards outlined by the International Labor Organization (ILO), as well as applicable laws and regulations
- Prohibit and refrain from any kind of child or forced labour within their organizations and throughout the supply chain
- Provide compensation to employees in compliance with applicable wage laws
- Respect the right of employees to form and join trade unions, to bargain collectively and engage in peaceful assembly

Scenario

You want to engage a supplier who refuses to acknowledge whether they prohibit forced or child labour in the Ethics and Compliance Checklist. Should I engage this supplier?

No. All suppliers are expected to comply with applicable laws and regulations pertaining to human and fundamental rights.

C.20 Privacy & Confidentiality

During the course of your employment, you may have access to a wide variety of confidential and proprietary information about CSA Group, and our clients, members and stakeholders. You have a duty to safeguard confidential information at all times. Confidential information includes personal information, which is defined as any information that can be associated with an individual. Personal information may refer to any information that can lead to either the direct or indirect identification of an individual. You may only access and use information about CSA Group, our employees, clients, members, and stakeholders in accordance with CSA Group instructions and strictly for the purpose for which it was provided. You must ensure that personal information is protected at all times in accordance with our Confidentiality and Privacy policy. Your obligations with respect to confidentiality continue even after your employment with us has ended.

Any unauthorized retention or disclosure may cause irreparable harm to the parties involved and may also result in serious penalties, including regulatory, civil and criminal. You have a responsibility to ensure that you are authorized in advance to disclose CSA Group information to third parties and that they are aware of, and contractually bound to comply with, confidentiality and data security safeguards.

Scenario

Is it acceptable to send certification documents to my personal home email address so that I can work on them from home?

No. Never send or forward any CSA Group related information to or from your personal email account. These documents may contain confidential information and should not be transferred to any external email servers.

Scenario

I travel often in my current role. Can I use my CSA Group laptop to check my bank account online while I'm travelling?

Yes. As long as it does not interfere with your work performance.

C.21 Investigations & Legal Proceedings

In the event you are contacted by a regulator, enforcement agency, or outside lawyer for information regarding CSA Group activities you must immediately, prior to responding, notify CSA Group's Legal & Compliance Department. You are required to cooperate with all internal and (as authorized by Legal & Compliance) external audits, investigations and inquiries. You should always be truthful. You may not testify as a witness on behalf of CSA Group or provide documents in response to legal requests without the prior authorization of Legal & Compliance.

C.22 Third Parties

As part of your job, you may be required to work with outside organizations. These third-party organizations may include agents, joint venture partners, representatives, consultants, subcontractors, or independent contractors. We may be held accountable for the actions of third parties who are acting on our behalf. You have a responsibility to ensure that the third parties you engage are properly qualified for the job and are contractually bound to abide by all jurisdictional legal requirements and applicable CSA Group policies, including this Code.

C.23 Insider Trading

Securities legislation prohibits trading when you have material information about a public company (e.g. a CSA Group client) that has not been publicly disclosed. It is against the law for you or anyone else to: (i) buy or sell securities based on undisclosed material information you obtained through your work with us; or (ii) pass this information on, whether intentionally or not, to someone who may then buy or sell the securities (called "tipping").

Scenario

We are testing a really innovative prototype for one of our top customers, a well-known publicly-traded company. This product is going to be a game-changer within its respective market. The company hasn't made a public announcement yet about the product. I'm thinking of investing in the stock and telling my family and friends to invest as well since I'm sure the stock is going to increase in the coming weeks. Is this okay?

No. If you buy shares in the company based on information that isn't publicly available, it would be considered 'insider trading' which is illegal. Telling your family and friends to invest would be considered 'tipping' which is also considered a criminal activity.

C.24 Financial & Business Records

You are responsible for the integrity and accuracy of our documents, records and business information. You must never falsify, tamper with or destroy, or unnecessarily retain documents, records or business information including test reports, procedures, and financial information except in keeping with the Records Management policy and procedure. You must ensure that all financial transactions and records are properly authorized and recorded, and presented accurately and fairly in accordance with International Financial Reporting Standards (IFRS) or other generally accepted accounting principles. You are also required to follow all internal control procedures and to never make any false or misleading statements with respect to any company information. For additional information, please refer to our Records Management policy and procedure.

Health, Safety, Security & Environment

D.1 Workplace Violence, Harassment & Discrimination

We are committed to maintaining a workplace that is free of violence, discrimination and harassment. We support the dignity and self-esteem of every employee and we will not tolerate violence, harassment or discrimination of any kind. We also ensure fair working conditions that comply with all applicable labor and employment laws. For more information, please refer to our Workplace Violence, Harassment and Discrimination Prevention policy and our Diversity, Equity & Inclusion policy. If you or someone else is in immediate danger, contact local police before reporting through internal channels.

Scenario

In the lunch room, another employee called me a disrespectful name associated with my cultural background. What should I do?

Immediately report the incident to your manager, HR or through the EthicsPoint Helpline.

D.2 Health, Safety, Security & Environment

Maintaining a healthy and safe work environment is one of our core values. We have a collective responsibility to create and maintain a healthy and safe work environment. We organize the work environment and working hours to reduce the risk of occupational accidents and support the health of the employees. We strive to be a leader in responsible environmental management and are committed to the protection and sustainability of the environment. This includes complying with all applicable environmental laws, rules and regulations. Creating a better, safer and more sustainable world is accomplished through maintenance of a healthy and safe working environment for our employees and taking the measures to reduce our impact on the environment and implementing continuous improvements as applicable. For more information, please refer to our Health, Safety, Security & Environment policy.

Scenario

I work in the lab and other employees are consistently placing samples and equipment in front of emergency exits and electrical panels. I reported this to my manager who said it was fine and told me to get back to work. Is this an issue?

Yes. Blocking emergency exits endangers employees, contractors and visitors in our buildings. In addition, we may face potential fines and liabilities for these safety hazards. It is crucial that emergency exits be accessible for immediate use in the event of a fire or other emergency. You should immediately report the incident to a senior level manager, your HSSE Site Representative/ Manager or through the EthicsPoint Helpline.

Scenario

I'm preparing for a test that will require the addition of chemical substances to test water. My manager advised me that the waste water from the test can be dumped down the storm drain. I'm not sure if this is allowed. What should I do?

Chemicals should never be released into the environment without confirmation that they are within the legal limits. Releasing chemicals into a storm sewer may be considered a spill. Consult with your HSSE Site Representative/Manager.



D.3 Substance Abuse

We maintain a workplace that is free from the effects of illegal use or misuse of drugs and alcohol. Such activities threaten our ability to provide a healthy and safe work environment for our employees. CSA Group will not tolerate the sale, distribution, illegal use or misuse of drugs or alcohol while conducting CSA Group business or when working on our premises.

Continuous Learning

We are committed to your ongoing development through learning and education. As part of your commitment to continuous learning, you have a responsibility to keep abreast of changes impacting our business in your area of expertise and to communicate these changes in a timely manner.

Disclaimer

Nothing contained in or implied by this Code creates or constitutes a legal obligation on the part of CSA Group. The provisions of this Code are subject to change from time to time, which will be posted on our website at www.csagroup.org

CSA Group

CSA Group is a global organization dedicated to safety, social good and sustainability. We are a leader in Standards Development and in Testing, Inspection and Certification around the world including Canada, the U.S., Europe and Asia. Our mandate is to hold the future to a higher standard.

CSA GROUP™

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