



**ETHICS &
CONDUCT CODE**

ETHICS & CONDUCT CODE



To all RSJ Stakeholders:

RSJ's core values are integrity, impartiality, confidentiality, commitment & transparency. Company's reputation and customer relations are built on these values. Business growth and improvement drives are always in correlation with these values. Placing these values at core & high intensity level, Ethics & Conduct Codes are structured.

Ethics & Conduct Code principles facilitate all associates, stakeholders & business partners to ensure alignment with the RSJ values, vision and mission. It is shared with stakeholders & business partners to create awareness about our work culture; hence the relation starts on sturdy foundation & last eternally. For associates it is obligatory to follow Ethics & Conduct Code supported by Code of Conduct which provides framework of simple Do's and Don'ts.

RSJ expectation is that the ethics & values to reflect in all RSJ business associations and in our associate's work & behaviours.

We have an Ethics Committee which is composed of internal and external representatives to govern the Code of Conduct, questions or queries or violations of code by any of associates or stakeholders or business partners can be addressed directly to compliance officer at yuvraj.jambhale@rsjqa.com or contact details mentioned on last page.

Thank you in advance for your strong support to make our Code of Conduct values.

Sincerely yours,
Sarath Chandran
Director – Admin

E-Mail: contact@rsjqa.com	Document no RSJ_HR_FT_04A	Revision No 09
Website: www.rsjqa.com	Effective from: 02/04/2019	Page 2 of 15

ETHICS & CONDUCT CODE



➤ INTRODUCTION

RSJ Inspection, a professionally managed conformity assessment body having Head Quarters in Noida (Delhi NCR), India. Established in 2009, RSJ's third-party conformity services are deemed to be among the most credible & reliable by a large portfolio of international buyers in the consumer goods segment. RSJ has been accredited by NABCB, India's IAF MLA member as per ISO 17020:2012 as well as for the ZED certification programme of the Ministry of MSME, Government of India. The promoters and the Senior Management team have wide experience in manufacturing & conformity assessment in the consumer goods segment.

➤ MISSION

To be in the business of verifying and evaluating products, processes, systems and organisations.

➤ VISION

To be a highly respected, innovative and quality service provider in conformity and maturity assessments.

➤ VALUES

Integrity, Impartiality, Confidentiality, Commitment, Transparency.

➤ Quality Policy

RSJ is committed to excellence in Quality Control Inspection, Audit, Assessment service & Product certification in consumer goods industry, in Asia, by providing the world class independent, customized services.

We strive to perform best service through the concentrated teamwork of competent personnel by adopting best industry practices to become the most respected Conformity assessment service provider.

We strive to deliver exceptional service & values to our stakeholders by innovative and best industry practices.

E-Mail: contact@rsjqa.com	Document no RSJ_HR_FT_04A	Revision No 09
Website: www.rsjqa.com	Effective from: 02/04/2019	Page 3 of 15

ETHICS & CONDUCT CODE



➤ RSJ CULTURE

RSJ Way	Not RSJ Way
Open & Transparent Culture <ul style="list-style-type: none"> ✓ People are free & Open ✓ Acceptance – allowing differences/failures ✓ Be in communication ✓ Promptness 	<ul style="list-style-type: none"> x Withholding / Dominating x Forcing/humiliating x Compromising x Unnecessary delay
Energetic & Active Culture <ul style="list-style-type: none"> ✓ Genuine Interest ✓ Value creation ✓ Resourceful ✓ Team work / Supportive 	<ul style="list-style-type: none"> x Taking granted x Un resourceful x Resistance / Low energy
Innovative Culture <ul style="list-style-type: none"> ✓ Thinking out of the box/Stretching your limits ✓ Making extra effort ✓ Learn from mistakes ✓ Continuous improvement ✓ Deliver good & Consistent experience 	<ul style="list-style-type: none"> x Limiting one self x Working in comfort zone x Repeating same mistakes
Impartiality <ul style="list-style-type: none"> ✓ Treating everyone equally ✓ Confidentiality 	<ul style="list-style-type: none"> x Discriminating x Loose talks/Gossips

Version-6

➤ PURPOSE

Maintaining high standards of Ethics & Compliance is the core component of RSJ’s strategy. Further to its Vision, Mission & Values, RSJ management team has elaborated this ethics and conduct code. This code describes the Ethics and Compliance in operations process for Inspection, Audit Assessment and Product Certification (IAAC) activities to maintain impartiality, independence, confidentiality, conflict of interest, competency and integrity.

➤ APPLICATION OF THE CODE

➤ As mentioned in the definitions of associates, these codes are applicable to all Associates of ‘RSJ’. For management & employee (s) all the codes are obligatory; however, all the codes may not be applicable for all Associates of ‘RSJ’, same is mentioned wherever it is required.

ETHICS & CONDUCT CODE



➤ CONTENTS

Sr. No.	Topics	Page no.
Section A: Compliance Principles		
1	Impartiality	6
2	Independence	6
3	Conflict of Interest	6
4	Integrity	7
5	Anti-Corruption / Anti-Bribery	7
6	Legal Requirements & Regulations	8
7	Safeguarding confidential business information and Data Protection	8
8	Competency	9
9	Fair Business Conduct	9
Section B: Employee Relations		
10	Fair labour	11
11	Anti-Discrimination	11
12	Prevention and prohibition of Harassment (including Sexual Harassment)	12
13	Health & Safety	12
Section C: Communication		
14	Raising Concerns	13
15	Acknowledgement	14
16	Establishment & Revision History	15

Section A: Compliance Principles

1.0 Impartiality

RSJ is committed to being honest & to ensure impartiality in providing Third Party Inspection, Audit, Assessment and product certification services by,

- 1.1. Identifying and evaluating the probable risks to impartiality.
- 1.2. Imparting appropriate measures to eliminate or minimize the potential risk.
- 1.3. Preventing Organizational, Commercial or other pressures from impartiality.
- 1.4. Inculcating impartiality as a culture among associates.
- 1.5. Periodically reviewing the risk and the mitigation to keep them up to date.

2.0 Independence

RSJ maintains its independence of judgment and does not surrender to pressure and inducements to misrepresent findings or alter the results of its activities (inspections, audits & assessment, product certification) by -

- 2.1. Being neutral and financially/commercially independent.
- 2.2. Being independent of the parties involved and is not linked to any party directly involved in design, manufacture, supply, installation, purchase, ownership, use or maintenance of the items inspected, or similar competitive items or facilities audited and assessed by
 - Common ownership
 - Contractual arrangements, informal understandings or other means that may have an ability to influence the outcome of any services.
- 2.3. Remunerating associates independent of the activities.

3.0 Conflict of interest

Definition: A conflict of interest (COI) is a situation in which a person or organization is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. Typically, this relates to situations in which the personal interest of an individual or organization might adversely affect a duty owed to make decisions for the benefit of a third party.

- 3.1. RSJ and its associates are committed to act as a faithful service provider and not engage in any activity that presents an unacceptable conflict of interest and avoid any perception of the same.
- 3.2. Company has an efficient system in place to avoid/neutralize/mitigate any actual or apparent conflict of interest.
- 3.3. RSJ and its associates shall never engage in any conduct which is, or could potentially be, harmful to its reputation.

ETHICS & CONDUCT CODE



3.4. In case conflict of interest arise while dealing with family member, personal investments etc. has been addressed in the Code of Conduct for Associates in the relevant sections.

4.0 Integrity

- 4.1. RSJ is committed to conduct its business and govern itself with integrity in a manner that is ethical, transparent and accountable.
- 4.2. RSJ and its associates shall perform their work being honest, diligent, responsible and not tolerate any deviation from its approved methods & procedures.
- 4.3. RSJ and its associates shall take due professional care to reflect actual findings in the report which must remain confidential & not be improperly changed on anyone's pressure, threat, favour etc.
- 4.4. All associates are required to abide by the company's code of conduct, policies and procedures.
- 4.5. All associates shall take decisions based on material facts in good faith and best professional judgment. No misleading or untruthful reports or certificates to be issued.
- 4.6. RSJ and its associates shall engage themselves in those services for which they have the necessary competence.
- 4.7. RSJ and its associates shall maintain accurate records, reporting and accounting of all financial transactions.

5.0 Anti-Corruption / Anti Bribery

- 5.1 We at RSJ have adopted and implemented a zero-tolerance anti-corruption and anti-bribery policy.
 - 5.2 RSJ associates must never, directly or indirectly through intermediaries, offer or promise or accept or give or solicit.
 - a) any personal or financial or non-financial benefits
 - b) tangible or intangible favours
 - c) accommodations and free transportation (except contractual agreements)
 - d) Gifts, expenses, inducement, reward
 - e) other advantage
- In order to
- i) obtain or retain a business or other advantage
 - ii) return or receive preferential treatment
 - iii) impair or be presumed to impair its professional judgment
 - iv) person acting, or refraining from acting, in relation to the performance of that person's duties
- 5.3 RSJ and its associates shall not indulge in any Act of utilizing, either directly or indirectly, one's access to a position of power or knowledge to demand unmerited cooperation or compensation as a result of coercive threats.
 - 5.4 RSJ shall account all its charitable contributions or sponsorships in a separate ledger and

E-Mail: contact@rsjqa.com	Document no RSJ_HR_FT_04A	Revision No 09
Website: www.rsjqa.com	Effective from: 02/04/2019	Page 7 of 15

ETHICS & CONDUCT CODE



consolidate all such payments made by any of the operations that form part of its organisation.

- 5.5 RSJ and its all associates will ensure that charitable contributions and sponsorships are not being used as a subterfuge for bribery.
- 5.6 RSJ consider making facilitation payments as bribe and prohibit them.
- 5.7 RSJ and its associates are prohibited to make any offer of bribe or inducement to any authority or agency acting on its behalf for securing any advantage to the company.
- 5.8 No employee will be penalised or face any adverse consequences for refusing to pay a bribe or for refusing to engage in corrupt practices or refusing to make a facilitation payment.

6.0 Legal Requirements & Regulations

- 6.1. RSJ is committed to fully complying with National & International regulations and laws, including anti-corruption and anti-bribery. Where appropriate, RSJ cooperate with law enforcement authorities on suspected or actual offenses against these laws.
- 6.2. Committing fraud is severely punished by national laws; RSJ does not tolerate it in any form.
- 6.3. RSJ and its associates shall not be knowingly a party of any illegal activity or indulge in acts that are detrimental to the profession or to the organization.

7.0 Safeguarding confidential business information and Data protection

As the nature of business that we are in, requires our customers to share with us their confidential business information, we understand the importance of such information. The unauthorized disclosure, while you are employed by the Company and thereafter, of any of the Company's confidential business information or intellectual property such as financial data, formulae, processes, advertising methods or prospective transactions, to any other person, firm or corporate is prohibited. The use - directly or indirectly - of confidential Company business information, while you are employed by the Company and thereafter, for your personal benefit, for the benefit of your immediate family or for the benefit of any other person, firm or corporate is prohibited. The use of such information generally to the possible detriment of the Company also is prohibited.

- 7.1. RSJ shall treat all information received in the course of the provision of its services as commercial-to-confidence to the extent that such information is not already published or made generally available to third parties or otherwise in the public domain. RSJ protects clients and their factory's confidential information including details of the factory, shipment, etc...

E-Mail: contact@rsjqa.com	Document no RSJ_HR_FT_04A	Revision No 09
Website: www.rsjqa.com	Effective from: 02/04/2019	Page 8 of 15

ETHICS & CONDUCT CODE



- 7.2. RSJ is committed to maintain confidentiality and to ensure that all the information in our database remains accurate and complete and are protected from unauthorized access and use.
- 7.3. RSJ has efficient systems in place to safeguard all collected data is stored & transferred in compliance with applicable law, is secure & is only accessible by authorised persons.
- 7.4. RSJ associates shall handle, with utmost diligence and care, any sensitive information that is brought to their notice through dialogue or observation and ensure that there is no attribution of the information to specific persons while communicating the findings to the client / factory management.

8.0 Competency

- 8.1. Personnel: RSJ is committed to provide reliable services to its client by allocating competent person in desired services.
- 8.2. Supervision: The associates allocated for the services have been well trained in-house and onsite training, verified for their competency by witness audits, appropriate supervisory checks and proficiency testing to ensure all work is performed as directed and supports the conclusions reached.
- 8.3. RSJ provides equal opportunity to associates to continue their professional / ethical development in their careers.

9.0 Fair Business Conduct

- 9.1. RSJ is committed to conduct itself with the highest standard of business ethics and integrity.
- 9.2. RSJ Respects the interest of all its stakeholders, by understanding their expectations and concerns, and ensuring that they benefit fairly from the value generated by the mutual business.
- 9.3. RSJ is committed to engage and provide value to its customers in responsible manners.
- 9.4. RSJ is committed to build its professional reputation on the merit of services and to compete fairly with competitors / within Team.
- 9.5. At RSJ, we believe in free competition and strive to outdo our competitors through honest and fair business practices. The management, all employees and associates are committed to make only factual claims and not provide any misleading or incorrect information about our competitor, their operations and their services.
- 9.6. RSJ is committed to adhere to Fair competition & anti-trust provisions and their compliance in accordance with the "*Compliance Manual for Enterprises under the competition act 2002*" This applies to services provided in India as well as to overseas client. Additionally, specific Fair competition & anti-trust provisions of overseas market are studied for ensuring compliance.

E-Mail: contact@rsjqa.com	Document no RSJ_HR_FT_04A	Revision No 09
Website: www.rsjqa.com	Effective from: 02/04/2019	Page 9 of 15

ETHICS & CONDUCT CODE



RSJ is committed not to indulge in any malpractice relating to obtaining unauthorized information about its competitors when participating in tenders.

- 9.7. RSJ is committed to adhere to the revised National Guidelines on Responsible Business Conduct (NGRBC) recently released by the Ministry of Corporate Affairs, Govt. Of India and is taking steps for its full adoption in due course.
- 9.8. The fair business policy includes a strict prohibition to all employees, especially those engage in contractual activities not to obtain any information that is confidentially held by client, competitors through any act of incitement or inducement. RSJ does not support obtaining any information through commercial espionage and/or data theft.
- 9.8.a RSJ presents itself & conducts marketing in an ethical manner that is truthful & not deceptive or misleading, including any comparisons / references with its competitors and their services.
- 9.8.b RSJ does not pay or offer improper incentives in any form for securing RSJ's business.
- 9.9. RSJ shall not make any contribution in cash or in any kind, to support a political, religious cause as a way of obtaining advantage in business transactions. Examples include gifts of property or services, advertising or promotional activities endorsing a political party, and the purchase of tickets to fundraising events. But any such contribution made on a personal basis, not on behalf of the Company and reimbursement must not be sought from the Company, directly or indirectly.



Section B: Employee Relations

10.0 Fair labour

- 10.1. RSJ is committed to promote the wellbeing of all employees including external associates.
- 10.2. RSJ prohibits any forced / bonded / prisoned labour and human trafficking/modern slavery.
- 10.3 RSJ is committed to:
- Ensure that remuneration to all associates including contractual associates meets applicable laws and prescribed limits of minimum wages at all times.
 - provide freedom to all their associates to choose their employment
 - fair recruitment and prohibits forced or bonded labour
 - make the terms and conditions of employment available to all associates before their employment is started - no forced or coerced labour shall be tolerated as part of disciplinary measures
 - not to use any form of prison labour
 - provide an opportunity to associates to continue their professional / ethical development in their career.
 - protect associates who, in good faith, make reports, seek advice or ask questions.
- 10.4. RSJ shall not engage in business with or cease business with any client (or its supplier/s) or business partner if it gains knowledge that client/ business partner is in violation of applicable child labour, forced/bonded labour or any other form of non-voluntary labour, in relation to services provided by RSJ.

11.0 Anti-Discrimination

Each associate is required to respect the rights and cultural differences of individuals. RSJ is committed to following the applicable labour and employment laws wherever it operates. These include laws pertaining to freedom of association, privacy, child labour and employment discrimination.

- 11.1. RSJ strongly believes it has the responsibility to engage in employment practices that meet the highest legal and ethical standards, ensuring that no associate will suffer undue harm because he or she raises an issue, reports a Code violation or cooperates with an investigation.
- 11.2. RSJ ensures equal employment opportunity (Examples are hiring, compensation, access to training, promotion, termination or retirement) without discrimination or harassment based on race, colour, religion, caste, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, union membership, political affiliation or any other characteristic protected by law.
- 11.3. RSJ prohibits any such discrimination, harassment.

12.0 Prevention and prohibition of Harassment (including Sexual Harassment)

RSJ is committed to providing a safe environment for all its associates free from discrimination on any ground and from harassment at work including sexual harassment. RSJ requires its associates to respect everyone they work with and does not tolerate abuse, bullying or harassment in any form.

13.0 Health & Safety

- 13.1. RSJ is committed to provide its services in a manner that is sustainable and safe.
- 13.2 Associate(s) safety is the first priority than anything else. RSJ holds paramount the safety, health, and welfare of the public in the performance of professional duties.
- 13.3. RSJ is firmly committed to a policy enabling all work activities to be carried out safely, and with all possible measures taken to remove (or at least reduce) risks to the health, safety and welfare of associates and anyone else who may be affected by our operations.
- 13.4. Associates have been advised to immediately terminate their work when there is threat to their own safety.
- 13.5. In case the conditions at the work place amounts to inflicting injury or threat to their personal safety, or serious health hazard, RSJ Associate has been advised to tactfully extricate themselves from the immediate situation, make themselves safe and subsequently report the full details of the incident to the management.
- 13.6. The induction training imparted to all fresh recruits includes specific modules on health and occupational hazards including safety risks during on site work.
- 13.7. RSJ encourages its associates to report any of the health and safety incidences through normal channels.

Section C: Communication

14.0 Raising Concerns

- 14.1. RSJ is customer focused organisation and customer satisfaction is the utmost priority for us. RSJ is committed to provide best of services and to handle the customer / stakeholder concerns (complaint / feedback / appeal / observation, etc.) in an appropriate way. Both anonymous and non-anonymous concerns shall be treated equally.
- 14.2. RSJ views concerns as a tool for improvement in terms of systems, process and skills of internal resources.
- 14.3. The information provided will be kept confidential. Your name will not be disclosed in any situation if you choose to be anonymous. The case will be handled with due respect and actions will be taken appropriately.
- 14.4. It is highly appreciated to suggest / communicate to us, if you find any of RSJ's or its associates activities are not aligned to our commitment to this code, feel free to express through below contact.
- 14.5. **Grievances Mechanism:** Please refer below weblink that contains detailed complaints and appeals procedure. <http://www.rsjqa.com/social-responsibilities/complaints-appeals>
- 14.6. **Contact**

Kindly do not hesitate to contact;

Integrity related issues	For any Feedback/ Compliant/ Queries
RSJ INSPECTION SERVICE LIMITED B-58, 2 nd Floor, Sector – 60, Noida (UP) 201307. Tel: +91 120 4118300, +91 120 4559205 Email: integrity@rsjqa.com	Mr. Yuvraj Jambhale Compliance Officer Mobile: +91-9819621121 Email: Yuvraj.jambhale@rsjqa.com

ETHICS & CONDUCT CODE



15.0 Acknowledgement- Part A (RSJ Associates)

I certify that:

- I have read the RSJ's Ethics and Conduct Code.
- I will comply with RSJ's Ethics and Conduct Code requirements, laws and regulations which are applicable to my work / association / conduct.
- I certify that, to the best of my knowledge, I have not violated, and I am not violating any of the codes or policies and commit not do so in the future.
- I will immediately report possible code violations of any associate if observed to appropriate contact
- I am not aware of any unreported violations

Associate's signature

Name of Associate and title

Date

Acknowledgement- Part B (Business stakeholders – Client / Factory etc)

a) We acknowledge that:

- We have read the RSJ's Ethics and Conduct Code.
- We will immediately report possible Code violations of any associate if observed to appropriate contact.
- We are not aware of any unreported violations.

Stakeholder's/ Business partner's signature

Name of signatory and title

Date

ETHICS & CONDUCT CODE



Establishment and Revision History

Rev No.	Page Affected	Effective date	Revised content	Prepared by	Reviewed by	Approved by
00	-	February 18,2015	Establishment of basic documents -for associate on 18/02/2015 -amended with Ethics and conduct code for RSJ on dated 27/05/2017	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
01	All	February 23, 2018	All clause	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
02	5	May 09, 2018	Clause 8.3 & 8.4 newly added	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
03	1,2,3,4,5		-Clause "Introduction" of company clause has deleted -in clause "Purpose" has added with assessment and product certification -clause Mission word" client " replaced to " stakeholder" -Clause 1: added product certification -cl4.1 word "responsibility" replaced with "responsible" -cl 6.1.-modified -cl 9.2 added "any form"	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
04	02	June 01,2018	In RSJ culture word "RSJ Not way" changed to "Not RSJ way"	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
05	1,5	June 12, 2018	Cl.6.4 has restructured Quality policy has added	Saravana Kumar	Yuvraj Jambhale	Sarath Chandran
06	All	Nov 23, 2018	Aligned with IFIA compliance program	Sudarshan Mane	Yuvraj Jambhale	Sarath Chandran
07	1 & 3	Feb 14, 2019	Update in Mission, Vision & Values	Sudarshan Mane	Yuvraj Jambhale	Sarath Chandran
08	All	March 27, 2019	Aligned with IFIA/ TIC-Council compliance program	Sudarshan Mane	Yuvraj Jambhale	Sarath Chandran
09	All	April 02, 2019	Formatting and setting changes	Sudarshan Mane	Yuvraj Jambhale	Sarath Chandran