



CODE OF BUSINESS ETHICS	QCS LLC	Doc No: QMS-POL-003 Issue Date: 01.03.2019 Revision No: 0 Last review date: n/a
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CODE OF BUSINESS ETHICS

Approved by	Anar Ahmedov
Reviewed by	Aysel Mammadova
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**CONTENT**

1.0	Introduction	Page 3
2.0	Compliance to local and international laws, regulations, conventions & other rules	Page 3
3.0	Relations with clients and suppliers	Page 3
4.0	Respect for rules on competition	Page 3
5.0	Promote ethic norms	Page 4
6.0	Conflict of interests	Page 4
7.0	Impartiality	Page 4
8.0	Maintain Confidential Information	Page 5
9.0	Compliance to restrictive measures in relation to international trade (embargos)	Page 5
10.0	Compliance to anti-corruption laws, conventions, codes & rules	Page 5
11.0	Gratuities, Gifts or Benefits	Page 5
12.0	Promote Human Rights	Page 5-6
13.0	Non-discrimination	Page 4
14.0	Against Forced Labor and Human Trafficking	Page 6-7
15.0	Reporting	Page 7
16.0	Liability	Page 7



1. Introduction

This Document records our beliefs and values and sets down our commitment to honesty, integrity and the promotion of an open and diverse business culture. It also sets down the key commitment that we must at all time maintain high ethical standards wherever we conduct our business.

This document sets out both what you can expect from QCS LLC – our values and also what our organization expects from you as a company partner and/or client – our code of business conduct.

The code applies to every one of us and following the code is mandatory for everyone working for QCS LLC with no exceptions.

This document supports our efforts to create an open, constructive, professional and efficient working environment where all parties feel confident to raise concerns and to seek advice.

Should you have any questions after reading this document please don't hesitate to contact company management for details or send written email to info@qcs.az

2. Compliance to local and international laws, regulations, conventions & other rules

QCS LLC fully acknowledges and accepts its obligation to comply with all applicable Azerbaijan and international legal and regulatory requirements and the compliance requirements of our Clients in this matter where they go beyond the Azerbaijan country requirements.

We also comply also with the rules laid down by supranational and international organizations, particularly the European Union and the United Nations.

We realize that some laws may in some cases be less restrictive than the principles set forth in this Code. In those situations, our staff and related parties should comply with the Code, even if the conduct would otherwise be legal under applicable laws. On the other hand, if local or international laws are more restrictive than the Code, then our staff and related parties should give priority and comply with applicable laws.

3. Relations with clients and suppliers

Our organization treats all clients and suppliers fairly, with integrity and deal with them all without distinction. Our company endeavors to do the best to meet the expectations of our clients and ensure, in particular, the quality, safety and effectiveness of the services provided. Our goal is to achieve a high level of clients satisfaction at all times. We deal fairly with all customers, suppliers, competitors and other interested parties and never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

4. Respect for rules on competition

We always act within the rules of competition law. Competition rules exist to ensure that competition takes place on a level playing field and with fair play. We aim to perform a successful business and believe that it can only be achieved through fair competition on professionalism, content, quality, safety, impartiality and price – and by ensuring that all these and other applicable issues are well balanced.



5. Promote Ethics norms

We always conduct our services honestly and expect our partners to do the same. Our company expects partners to conduct themselves in a businesslike manner. Examples of ethical behavior include but are not limited to the following:

- Act in an honest and truthful manner,
- Treat other interested parties fairly and with respect,
- Be accountable for actions taken and avoid financial burden or other obligation to outside individuals or organizations that might influence the performance of official duties,
- Comply with this code and the procedures underlying its provisions as condition of contract agreement.

6. Conflict of interests

Our organization has a processes to identify, analyse, evaluate, treat, monitor, document and control the risks related to conflict of interests arising from provision of certification including any conflicts arising from its relationships on an ongoing basis.

A conflict of interest may occur when employee's interests or activities affect their ability to make objective decision for an organization. Different types of conflicts of interest at workplace can occur, such a:

- Outside jobs and affiliations with competitors, customers or suppliers
- Consulting works for client organizations who applied to our company for certification
- Working with close relatives, especially those who are employed by client organizations or government
- Serving as a board member of another organization
- Investments, including those of close relatives, which might influence or appear to influence your judgment.

Our organization encourages its employees to disclose situations that might create a conflict or even an appearance of a conflict.

7. Impartiality

QCS LLC understands the importance of impartiality in carrying out of certification activities. Our management is committed to provide impartiality in all types of certification processes and will ensure that all audits and inspections are carried out impartially and objectively - and are perceived as such by the interested parties - in compliance with the relevant requirements.

We request the personnel, internal and external, to reveal any situation known to them that can present them or our organization with an impact to impartiality. We will record and use this information as input to identifying threats to impartiality raised by the activities of such personnel or by the third party organizations that employ them, and shall not use such personnel, internal or external, unless they can demonstrate that there is no threats to impartiality.

We do not provide certification in cases of unacceptable threat to impartiality.



8. Maintain Confidential Information

Confidential client, process, project information and intellectual property is one of the company's most valuable assets and should be treated accordingly. Our organization is committed to keep client related information in confidentiality. We expect our employees and partners will not, without the prior written permission of the company either disclose or allow to be disclosed or use any confidential information concerning the business dealings, affairs or conduct of QCS LLC or any of its employees, client or business partners nor to allow intellectual property to be compromised.

9. Compliance to restrictive measures in relation to international trade (embargos)

Sanctions and embargoes are political trade tools, mainly put in place by the United Nations (UN) and the European Union (EU) against target countries with the aim of maintaining or restoring international peace and security. Those restrictions may also be imposed to uphold respect for human rights, democracy and the rule of law. UN and EU uses different types of embargos - arms embargoes; imports or export bans; financial sanctions; travel bans and others.

Our organization complies with all of the sanctions and embargos approved by the European Union and the United Nations and will not do business with any country, organization or person which covered by requirements of the restrictions.

Our organization will monitor availability of business of its clients, suppliers and sub-contractors with countries or organizations under sanctions and violations identified will be resulted with termination of business relations.

10. Compliance to anti-corruption laws, conventions, codes & rules

Our staff and related parties are required to comply with anti-corruption laws, conventions, codes & rules. Each person or organization, which works for or with QCS LLC, shall accept zero-tolerance approaching to acts of any type of corruption; facilitation payments; kickbacks; bribes and anti-money laundering. We accept that the bribery, corruption and anti-money laundering are criminal offences and punishable for individuals by imprisonment and a fine, and if the Company is found to have taken part in corruption and money laundering we could face an unlimited fine, be excluded from tendering for any contracts and face damage to our reputation. Our organization takes its legal responsibilities very seriously and expect all our staff members and partners to do the same.

11. Gratuities, Gifts or Benefits

Our employees shall not receive any gratuities, gifts or benefits from client organizations in return for any compromises in audit execution and certification process.

Our partners shall not offer to company employees any gratuities, gifts or benefits in return for improved service or other issue. Such behavior will result in termination of contract agreement.

12. Promote Human Rights

We accept that all human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood. All peoples have the right of self-determination. By virtue of that right they freely determine their political status and freely pursue their economic, social and cultural development.

All peoples may, for their own ends, freely dispose of their natural wealth and resources without prejudice to any obligations arising out of international economic co-operation, based upon the



principle of mutual benefit, and international law. In no case may a people be deprived of its own means of subsistence.

13. Non-discrimination

Our organization provides to its employees and partners equal opportunities in terms of recognition irrespective of their origins, religion or gender. Our company does not tolerate any form of discrimination or harassment. Any action of a discriminatory nature is strictly prohibited, especially as regards nationality, gender, ethnicity, religion, and sexuality or immigration status for all of our workforce and/or partners. The same attitude we expect from our business partners.

14. Against Forced Labor and Human Trafficking

Our organization accepts that no one shall be held in servitude or be required to perform forced or compulsory labor. Each person has the right to work, to free choice of employment, to just and favorable conditions of work and to protection against unemployment. Everyone, without any discrimination, has the right to equal pay for equal work.

Everyone who works has the right to just and favorable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection. Everyone has the right to form and to join trade unions for the protection of his interests. Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

15. Reporting

As part of its commitment to ethical and lawful conduct, we strongly encourage our employees and all partners promptly report any suspected violations of this Code or applicable laws. Our partners must notify QCS LLC director immediately, if they believe or suspect that a conflict with requirements of this has occurred, or may occur in the future.

If reporter does not feel comfortable stating his/her name – he/she can make report confidentially. In this case no attempt will be made to identify the individual. Information provided by the individual, or obtained in the course of investigation, will be treated as confidential to the extent permitted by law. Reports may be submitted in a language, which is most comfortable for reporter: Azeri, English or Russian. Our management will accept and consider all reports regardless of the language used for reporting.

16. Liability

Violation of the requirements of the Code and /or laws applicable to work performance may incur liability in the cases stipulated by the Labour Code, Civil Code, the Code of Administrative Offences and the Criminal Code of the Republic of Azerbaijan.

Anar Ahmedov. Director

25 January 2019

I confirm that I've read, understood and accepted the requirements of this Code of Business Ethics:

(name, surname)

_____ " " 2019
(signature)