



INTEGRITY
PROGRAM

Impartiality and conflict of interest policy





IMPARTIALITY AND CONFLICT OF INTEREST POLICY

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1. OBJECTIVE

The objective of this policy is to highlight the importance for IRAM to guarantee the impartiality and independence of its staff in the performance of their tasks, since these conditions are vital to ensure the professionalism that distinguishes the work developed by our Institute, as well as establishing action principles aimed at ensuring the necessary impartiality and independence.

2. SCOPE

This procedure applies to all those who interact with third on behalf or in the interest of IRAM, irrespective of their level, hierarchy or their links to IRAM.

3. DEFINITIONS

- Conflict of interest: an objective situation in which our particular interests - whether economic or not - interfere or may interfere with our objectivity and impartiality. In other words, this scenario includes cases of real conflict of interest as well as apparent conflicts, which occurs when someone might suspect or reasonably think that a conflict may exist even though it does not actually exist.
- Corruption: any undue advantage promised and/or given to a public official (in accordance with the definition of bribery), as well as any action intended to directly or indirectly influence a person to commit a misconduct or give an undue advantage.
- Family member: includes spouse or partner, children, stepchildren, parents, stepfather/stepmother, siblings, grandparents, grandchildren, cousins, and/or any person sharing housing with an IRAM staff member.
- Public official: any person holding a legislative, administrative or judicial office, by appointment, election or as a successor, or any person exercising a public function, even for a public body or public company, official or agent of a local or international public organization, or any candidate for a public office. This concept should be interpreted broadly and includes all persons acting or purporting to act on behalf of the State at any of its levels (national, provincial and municipal) and powers; it also includes persons acting or purporting to act on behalf of foreign States or international bodies.



- Gifts or presents: gifts, benefits or advantages of any kind given free of charge as liberality, courtesy or attention
- Hospitalities, accommodation, transport, entertainment, events, food.
- Bribery: an offer, promise, delivery, acceptance or request of an undue advantage of any value (whether or not of a financial nature), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or fail to act in relation to the performance of his/her duties.

4. CONTEXT

IRAM is committed to carrying out each and every one of the actions it promotes with: integrity, excellence, commitment and independence. All of these values are essential and equally important.

However, this procedure addresses some issues that should be avoided as they affect the ability to act with self-control, free of external conditioning, with neutrality and impartiality.

In other words, guidelines will be established to avoid situations of conflict of interest and guarantee impartiality, as well as a disclosure and abstention procedure to be applied when this type of situation arises.

5. SITUATIONS THAT COULD LEAD TO A CONFLICT OF INTEREST.

Although it is not feasible to list all the situations of conflict of interest that might arise, the following are some of the situations that most commonly affect our objectivity and impartiality



However, in all the situations where there is doubt as to whether such a situation exists, the worker is expected to (a) make the relevant consultation and (b) refrain from intervening preventively, in accordance with chapter 7 of this procedure.



5.1. Gifts and hospitalities from suppliers

5.1.a. General action guide

Those who act on behalf of or in the interest of IRAM may give or receive gifts or hospitalities as part of IRAM's activities. However, they are not allowed to give or receive them if there is any improper purpose, in the expectation of receiving something in return or in a manner that could be perceived as having an improper purpose.

5.1.b. Guidelines

Gifts may only be received from a third party with whom IRAM has commercial and/or other links, provided that they meet the following requirements:

- a) They do not violate any applicable law;
- b) Do not imply or appear to imply an expectation of receiving something in return and/or unduly influencing IRAM's decision;
- c) Are not cash or cash equivalents;
- d) Are of small value and are given as a matter of courtesy or similar reason.
- e) Are not frequently given to the same beneficiary and/or are given to several persons of the organization in such a way that their sum implies a significant expenditure by the third party.

Gifts will be considered to be acceptable when their value does not exceed U\$S 100.

If a gift is received from a third party that does not comply with this policy, the recipient shall inform the gift giver the guidelines of this policy and, in addition:

- If the gift is not food, it shall be returned.
- If the gift is food (e.g., chocolate or wine) it may be accepted and shall be submitted to the Human Resources Management for its proper disposition.



5.1.c. Use of funds or resources unrelated to IRAM

None of the persons covered by this policy shall use their personal funds or those from any other source unrelated to IRAM to carry out any of the prohibited actions in the name or the interest of IRAM.

5.1.d. Gifts and hospitalities to public officials

When the recipient of the gifts or hospitalities is a public official, in addition to adhering to these guidelines, prior approval must be obtained from the Integrity Committee, except in cases where a nominal reception is given (e.g. non-alcoholic beverages such as coffee, tea, soda, water or light snacks of nominal value that are usually available at no cost at IRAM as a part of its activities).



If the gift is offered by a public official or a by person connected to a public official, even if it is in compliance with the above guidelines, the Integrity Committee shall be consulted. If you are not sure of the value of a gift or are concerned about the frequency of gifts from a third party, the Integrity Committee should also be consulted.

See also Policy for the Prevention of Unlawful Acts within the Framework of Interactions with the Public Sector.

5.2. Business decisions involving an IRAM staff member

No person acting on behalf of or in the interest of IRAM is permitted to make decisions or participate in deliberate ways that would be of benefit to the decision maker, a family member or a friend of the decision maker, unless he or she a) Informs the Integrity Committee about the nature of the relationship from the beginning and b) He or she refrains from intervening in both the selection process and the execution and payment process.

An interest is deemed to exist when the decision maker, a family member or a friend of the decision maker:

- a) Has some kind of direct or indirect shareholding and/or is the owner of a supplier or competitor company of IRAM.
- b) Has been or is an employee of said company.



- c) Engages in any type of commercial activity with the company.

5.3. Restrictions on work relationships with relatives

Although it is possible for people with family ties to work for IRAM, no member of IRAM staff shall be allowed to:

- a) Hire, supervise or be supervised by a family member.
- b) Participate in making decisions about the performance, remuneration and/or promotion of a family member.

5.4. Participation in activities external to IRAM

It shall not be allowed to carry out and/or participate in any activity, association or external employment that compromises or may compromise the loyalty to IRAM or that interferes or may interfere with our ability to carry out the work entrusted to us with the utmost objectivity and independence.

6. IMPARTIALITY IN CERTIFICATION AND INSPECTION PROCESSES

Additionally, it is expected that IRAM staff members will respect the procedure of impartiality in certification and inspection processes, according to which those who carry out certification and inspection activities shall commit themselves to:

- a) Not to offer or provide consultancy services.



- b) Not to offer or provide internal audits to their licensees.
- c) Not to sell or offer activities related to a consultancy organization and act accordingly to correct inappropriate statements by a consultancy organization.
- d) Take measures to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.
- e) Ensure that all personnel involved in certification and inspection services act impartially and without commercial, financial or other pressures that might compromise their impartiality.
- f) Manage all certification and inspection processes within the framework of confidentiality, impartiality and security, taking actions to eliminate or minimize any threats to compliance with these principles.
- g) Respect and make others respect the principles of impartiality, responsibility, transparency, confidentiality and trust.
- h) To sign, upon starting their specific activities, the Commitment of Confidentiality, Impartiality, Security and Acceptance of Rules and Procedures for the services to be provided.



In the event of a violation of the impartiality policy, it shall be reported to the Impartiality Safeguarding Committee, as established in the provisions of IRAM's statute and the supplementary rules issued by that Committee, to: integridad@iram.org.ar.

Accordingly the characteristics of the event, an action will be agreed between the above Committee and the Integrity Committee, in order to deliver a consistent and comprehensive response.

7. DISCLOSURE AND ABSTENTION PROCEDURE

When some of the above situations or any other situation that could affect impartiality or put it reasonably in doubt arise, the following measures shall be taken:

- a) The situation shall be immediately reported to the immediate hierarchical superior of the concerned person, with a copy to the Integrity Committee. An institutional email will suffice for this purpose.



- b) As a preventive measure, refrain from intervening in the situation. Abstention shall cover all actions linked to the selection process, such as execution and payment.
- c) Decision-making power shall be transferred to a person with higher rank than the person concerned in an actual or potential conflict of interest. In all cases, the Integrity Committee shall ratify who will be the intervening person. In those cases where the reporting person does not have a hierarchical superior, the Committee will designate another staff member of IRAM with whom the latter has not a direct work relationship.

8. VIOLATIONS

Failure to comply with this policy could result in serious consequences for IRAM. Therefore, failure to comply with this policy will also result in serious consequences for those who violate it and/or fail to respect the disclosure and abstention procedure.

9. VALIDITY

This document shall be effective from the day immediately after the date of its approval by the Directive Council, until it is amended or superseded by a new one.

10. RELATED DOCUMENTS

- Code of Conduct
- Policy for the prevention of illicit activities in the framework of interactions with the public sector.
- IRAM's Statute and Policy of impartiality approved by the Certification Directorate.
- Commitment to Confidentiality, Impartiality, Security and Acceptance of Rules and Procedures (DC-FG 007)
- Commitment to Confidentiality, Impartiality, Security and Acceptance of Rules and Procedures for Inspection Services (DC-FG 374)



INTEGRITY
PROGRAM

Policy for interaction with public officials





POLICY FOR INTERACTION WITH PUBLIC OFFICIALS

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1. OBJECTIVE

The purposes of this policy are:

establishing clear principles to guide the actions of all IRAM staff members, regardless of their position or role, as well as the actions of those who act on behalf of or in the interest of IRAM - whether or not they are linked to the Institute - and in the fulfilment of their task must interact with public officials at any level and in any jurisdiction, in order to prevent the perpetration of illicit acts;

defining the guidelines to be followed in order to ensure the interactions are appropriate, ethical and transparent and are perceived as such.

2. SCOPE

All kinds of interaction carried out by all persons acting on behalf of or in the interest of IRAM

3. DEFINITIONS

- Conflict of interest: an objective situation in which our particular interests - whether economic or not - interfere or may interfere with our objectivity and impartiality.
- Political contributions: goods, funds, services or advantages provided to finance, support or sustain a party structure or an election campaign of any political force in any national or foreign jurisdiction
- Corruption: any undue advantage promised and/or given to a public official (in accordance with the definition of bribery), as well as any action intended to directly or indirectly influence a person to commit a misconduct or give an undue advantage.
- Public official: any person holding a legislative, administrative or judicial office, by appointment, election or as a successor, or any person exercising a public function, even for a public body or public company, official or agent of a local or international public organization, or any candidate for a public office. This concept should be interpreted broadly and includes all persons acting or purporting to act on behalf of the State at any of its levels (national, provincial and municipal) and powers; it also includes persons acting or purporting to act on behalf of foreign States or international bodies.



- **Hospitalities:** meals and refreshments, as well as cultural, entertainment or sports events, in which at least one IRAM collaborator acts as a host and participates.
- **Public official interaction or dealings:** these include oral conversations, written exchanges, meetings or any other situation in which subjects that are of interest to the company are dealt with or discussed, involving members or representatives of IRAM (which also includes third parties who are performing services on behalf of IRAM) on the one hand and officials on the other.
- **Facilitation Payments:** are payments to officials to expedite routine public acts or procedures, such as visas, permits, authorizations, etc.
- **Gifts or presents:** gifts, benefits or advantages of any kind given free of charge as liberality, courtesy or attention.
- **Bribery:** an offer, promise, delivery, acceptance or request of an undue advantage of any value (whether or not of a financial nature), directly or indirectly, and regardless of location, in violation of applicable law, as an inducement or reward for a person to act or fail to act in relation to the performance of his/her duties.

4. CONTEXT

All of IRAM's activities are guided by the values of ethics, integrity, transparency and compliance with the law.

Everything that happens in the context of a task or service performed for the Institute shall be considered as an activity that is directly performed by IRAM or in its behalf or interest. The same will apply when the person performing an activity or service is a professional or a company working for or together with IRAM. This entire universe must act in accordance with the guidelines and principles arising from the Code of Conduct, as well as the guidelines set out in this policy. In this context it is clear that IRAM has zero tolerance for bribery and corruption, which means that any act of bribery, influence peddling and/or corruption is strictly forbidden, and that, when faced with a demand or request of this nature, it is expected that IRAM's refusal to act in such a way will be informed to the applicant and that the situation will be immediately reported to the relevant hierarchical superior, the ethical channel, or any member of the Integrity Committee.



4.1. IRAM has zero tolerance for bribery and corruption

This means that any act of bribery, influence peddling and/or corruption is strictly prohibited and that, upon such a request or requests, it is expected that IRAM's refusal to act in such a manner will be conveyed to the applicant and the situation will be immediately reported to the relevant hierarchical superior, to the ethics channel or to a member of the Integrity Committee.

4.2. IRAM forbids making gifts and donations to public officials

With the exception of inexpensive gifts intended as a courtesy or similar purpose and not intended to influence business decisions in bad faith or appear to serve an improper purpose.

4.3. IRAM has zero tolerance for anti-competitive practices

IRAM will not tolerate participation in any type of practice that is contrary to fair and free competition in the market; whether in actions involving potential competitors of the Institute or involving third parties with whom IRAM interacts in the framework of its institutional activity.

4.4. IRAM forbids making political contributions

IRAM forbids making political contributions of any kind in its name, benefit or interest, without this implying any kind hindrance or limitation to the political or social militancy of its staff members.

4.5. Obligation to report

All the persons covered by this policy have an obligation to report any violations of the Code of Conduct, this Policy and/or any irregularities within the operational scope of IRAM of which they become aware, through the channels established for such purposes.



5. GUIDELINES FOR INTERACTION WITH PUBLIC OFFICIALS

Without prejudice to the general guidelines that arise from the Code of Conduct (some of which were set out in the previous point) which must be respected by all and at all times, interaction with a public official may take place in different scenarios.

Depending on the context in which it takes place, the following guidelines shall be followed:

5.1. Interaction with public officials outside IRAM premises

Within what is perceived as normal, customary and reasonable in the context of the services provided by IRAM, these guidelines shall be followed:

- a) As a general rule, interaction with public officials shall take place within the public offices where they work.
- b) Where this is not possible and the interaction takes place outside public offices, unusual, suspicious, infrequent or disreputable locations shall be avoided.
- c) Whenever possible, and when it does not represent a logistical or bureaucratic inconvenience, meetings shall be attended by more than one representative of IRAM.
- d) Meetings which are deemed to be of particular importance or sensitivity for the body shall be notified in advance to the relevant hierarchical superior.
- e) Meetings with public officials shall be reported in the "My Activities" system (or any subsequent replacing system), where the content of the interaction and the place where it took place shall be briefly indicated.
- f) Where any spontaneous interaction with public officials takes place in the context of activities carried out for IRAM, this shall be loaded in the system "My Activities" system (or any subsequent replacing system) only if a subject directly related to the interests of the public entity has been discussed.
- g) If any questionable, unusual or unlawful behavior has taken place in the course of the meeting or any other kind of interaction, it shall be reported to the immediate hierarchical superior and/or the Integrity Committee.



5.2. Interaction with public officials within the framework of product certification processes and/or management systems

In those cases where certification services for products and/or management systems of public entities are to be provided, it is expected that those who participate in such processes on behalf of IRAM will be particularly mindful of the obligations arising from this policy and that, in addition, they will :

- a) Reject any hospitality and/or benefits eventually offered to them, except for matters strictly inherent to the purpose of enabling the task to be carried out (such as, in some cases, food).
- b) Consider that, as far as possible, it is desirable that two persons participate in these processes on behalf of IRAM.
- c) Inform IRAM before starting the task if they find themselves in a situation of conflict of interest (see Policy on Impartiality and Conflict) of Interest).
- d) Remember that they have an obligation to report any irregularities that may have occurred.

5.3. Interaction with public officials within IRAM

Persons covered by this policy who interact with public officials in the context of some of the activities they carry out at IRAM or on its behalf and/or in its interest, shall observe the following:

- a) They shall not grant them any type of hospitality and/or benefit, except those strictly necessary, such as meals, as long as the nature of the interaction so requires.
- b) They shall be particularly careful not to discuss issues on which the public officials have to decide and which have a direct impact on IRAM.
- c) In the case of an audit or inspection by members of an inspection body, the person(s) who interacted with them shall record this in writing and inform his/her/their superior, taking into account the frequency of the activity and the reason for the interaction, giving an account of the main subjects that have been reviewed, stating the name and position of the public official(s) with whom the interaction took place, the persons who participated, the reason for the meeting and the subjects discussed, as well as the place and date.



5.4. Non-presential interaction with public officials

When a request for information or clarification from a public official is received via e-mail, the reply shall, in all cases, be made by the same means and sent to the public official, with a copy to a hierarchical superior.

When a telephone call is received from an official on a subject directly linked to the operational activity of IRAM, the provisions of Article 5(1)(e) shall apply.

5.5. Training grant policy

Considering IRAM's commitment to the community and society, IRAM may award training grants to public bodies, provided that they are not granted for the purpose of influencing a specific decision of the public body and/or the public office awarded with the grant.

Likewise, and in order to guarantee the social purpose of the training grant, those who actually benefit from the grants awarded by IRAM, shall sign a commitment through which they commit themselves to use the knowledge they will acquire for the benefit of their organization and therefore, for the benefit of society as a whole.

5.6. Gifts and hospitalities

Whatever the context of an interaction with public officials, they shall not be given hospitalities or gifts in violation of any applicable rule or implying, or appearing to imply, an expectation of receiving something in return and/or of improperly influencing them. Facilitation payments shall not be made under any circumstances.

In this cases, prior approval shall be obtained from the Integrity Committee, except in cases where a nominal reception is given (e.g. non-alcoholic beverages such as coffee, tea, soda, water or light snacks of nominal value that are usually available at no cost at IRAM as a part of its activities).



See also Impartiality and Conflict of Interest Procedure

6. PROCEDURE

6.1. Communication mechanism

In order to comply with the above guidelines, all IRAM staff members involved in an interaction with public officials shall:

- a) Use the system "My Activities" (or a subsequent replacing system).
- b) Inform the Integrity Committee, via email (integridad@iram.org.ar) when any sensitive or relevant issue arises from the interaction that could imply a breach of the Code of Conduct and/or the other policies that make up IRAM's Integrity Policy.

6.2. Specially important meetings

Except in those cases where a meeting with a public official is necessary to deal with an issue of special relevance to IRAM's interests, IRAM staff members may interact with public officials, without it being a condition to request the authorization from the direct supervisor and/.or have the express authorization from the Integrity Committee.

7. VALIDITY

This document shall be effective from the day immediately after the date of its approval by the Directive Council, until it is amended or superseded by a new one.



8. RELATED DOCUMENTS

- Code of Conduct
- Impartiality and Conflict of Interest Procedure
- IRAM Statute