



SRAC CODE OF ETHICS

SRAC-R - 11

Approved

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Director General

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	Name	Function	Date	Signature
Elaborated	dr. ing. Cristian Roncea	Technical Director	01.07.2024	

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LIST OF UPDATES

<i>Edit</i>	<i>Review</i>	<i>Content of the amendment</i>	<i>Modified page</i>	<i>Date</i>
1	0	Initial elaboration	-	01.07.2024

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1. General

- 1) The Code of Ethics outlines the commitments of SRAC CERT (hereinafter referred to as the organization) in its relationship with its associates, employees, business partners and other stakeholders and the rules of individual conduct of our employees by which the values of the organization are assumed.
- 2) The Code of Ethics is a guide to professional conduct and how to deal with ethical business issues in order to strengthen the trust of internal and external audiences and to achieve performance.
- 3) The Code of Ethics is binding and applies to all parts of the organization, at all times and irrespective of the position within the organization, both in relations within the organization and in relations with customers, suppliers, civil society, the local community or other stakeholders. The organization's management and staff will comply with it in letter and spirit

2. Values of our organization

In order to achieve the goals of the organization, our employees assume the following values:

1) Performance

The performance of each employee contributes to the value of the organization.

2) Integrity

Through integrity, honesty, fairness and incorruptibility, every employee creates the conditions for a strong and resilient organization.

3) Creativity

The creativity of every employee ensures the future of the organization.

4) Team spirit

Together, employees have the strength to achieve organizational goals.

5) Social responsibility

By understanding and respecting the environment and the social environment in which they live and develop, each employee contributes directly to their own and the organization's well-being.

3. Interests of the members holding shares in the organization


The management and employees of the organization are aware that the interests of the associates must be respected and protected and therefore have as a major objective to increase the value of the organization and maximize the profit obtained, taking into account the principles of sustainable development and social involvement.

The company ensures fair treatment of all associates, regardless of the number of shares held and also ensures equal access to the organization's information, respecting the same rules of transparency and facilitating the exercise of their rights

4. Organizational commitments

1) Recruitment / promotion / training / authorization of employees

- a) The recruitment / promotion of employees shall be done in a transparent manner, taking into account the competence, professional experience required, the obligations / restrictions established by law and the specific risks with regard to the activities to be performed and the

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integrity of the candidates, which shall be verified upon hiring / promotion, in order to avoid situations that may negatively affect the company.

- b) The organization identifies and ensures the training needs of employees so that they perform their activities in accordance with job-specific legal requirements.
- c) Every employee occupying a post for which the necessary visas, authorizations or attestations are required for the exercise of the profession shall ensure that he has such valid visas, authorizations or attestations and shall inform the immediate superior of the period of their validity. If these permits, authorizations or attestations are no longer valid or if the legal conditions for the exercise of the profession are no longer fulfilled, the employee shall immediately inform the immediate superior and the Human Resources Department in writing.

2) Safety and health at work

- a) The organization provides a healthy and modern working environment, in compliance with the relevant labor regulations and which ensures the protection of the bodily integrity and health of employees and collaborators performing activities within the organization.
- b) Appearing at the start of the program under the influence of, possessing, offering, consuming alcohol, illegal substances, drugs and/or other hallucinogenic substances at the workplace, and in other places and/or on other work-related occasions and/or in the course of work-related activities is strictly prohibited. Any employee or collaborator who becomes aware of any such non-compliance is obliged to immediately inform, verbally and in writing (email and/or electronic message), the hierarchical superior of the employee/collaborator in this situation.
- c) All employees must be familiar with and comply with health and safety rules at work, in accordance with the relevant safety, health and fire protection regulations.

3) Protect and efficiently use the organization's assets

- a) Employees are responsible for safeguarding/ensuring the protection of all tangible, financial and other assets of the organization and of the partners they are entrusted with managing. The assets of the organization, partners and other third parties may be accessed and used only for authorized purposes and in accordance with applicable authorizations and conditions.
- b) The improper or unauthorized administration, management and use of assets held by the organization are breaches of obligations to the organization as a result of which its economic interests are harmed.
- c) For the purposes of this document, assets include cash, securities, physical property (assets, inventories, equipment, etc.), business plans, customer and client information, intellectual property and any other personal, copyrighted and confidential information.
- d) The management together with the employees directly subordinated to it develops and implements a system of internal regulations through which it organizes the activities within the organization so that they are carried out efficiently, by allocating the necessary resources, identifying the necessary risks and taking the necessary measures to cancel / reduce them to an acceptable level.

4) Protecting the image and reputation of the organization

4.1 Conduct requirements

- a) Management and staff are expected-both on and off the job-to refrain from expressions that may have a negative impact on the organization's reputation. The organization expects its employees to conduct themselves, even outside the workplace, in accordance with and in a manner consistent with the organization's ethical standards, particularly when their activities or themselves may be associated in any way with the organization or when they appear to be acting or expressing opinions on behalf of the organization.

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- b) Management and staff may participate and express their views in any organization (political, religious or cultural) only as individuals, and must refrain from making references to their association with the organization.
- c) Management and staff will not exercise their right to express themselves in any way that may harm the image and reputation of the organization or its lawful economic or organizational interests.

4.2. Social media

The organization's management and staff must refrain, in the course of their activities in the media, from any expression that may have a negative impact on the organization's reputation. The organization expects them to conduct themselves - during their communications in the media in which they are individuals - in accordance with and in a manner consistent with the organization's ethical standards, particularly when their activities or themselves may be associated in any way with the organization or when they appear to be acting or expressing opinions on behalf of the organization.

4.3. Political involvement

The organization recognizes the right of the organization's management and staff to take on roles in politics and public life, but such activities can only be performed outside the workplace. In the course of their political activities outside the workplace, Management and staff shall not abuse their positions within the Organization and shall refrain from conduct that may have a negative impact on the Organization's reputation.

5. Anti-bribery

The organization's management believes that any form of corruption directly and negatively affects the organization's work and jeopardizes its strategic objectives. The Code of Ethics defines the way of analysis and coordinated implementation of specific legal regulations, SR ISO 37001 Anti-Bribery Management Systems standard on prevention and detection of corruption within the organization.

The management and staff of the Company or any other person acting on behalf of the organization shall never offer, promise or pay money and shall never offer / promise / demand / receive / accept any valuable asset with the purpose of influencing / being influenced for decision making / performance of duties as per legal / internal regulations. Situations that may create the impression/suspicion of such situations should be avoided.

Assets of value include financial or other advantages such as - besides cash - gifts, credit/loans, guarantees, discounts, entertainment, services, benefits, job offers, sponsorships, etc.

5.1 Gifts

- a) Gift giving is often part of local culture and traditions. Giving gifts as part of business relationships can contribute to the reputation of the organization and establish good business relations. The monetary value of these gifts should not exceed 50 euro.
- b) No gifts of any kind - regardless of value - should be accepted outside the organization.
- c) If a gift in excess of the above-mentioned limit is received and it cannot be refused, the Human Resources Department must be notified, specifying the organization or person from whom the gift was received, the nature of the business relationship with the person concerned and its content.
- d) Any form of gift at the expense of the organization must not exceed 50 euro and is clearly not given with the purpose of influencing the existing or to be created business relationship with the organization.
- e) Management and staff should not offer or accept gifts in circumstances that can be interpreted from the outside as likely to influence a business decision or as a case of bribery

5.2 Hospitality

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- a) The extending or accepting of business invitations is permitted strictly in the interest of the Organization. This may include attending events/presentations/receptions or lunch/dinner invitations.
- b) The cost of the invitations borne by the organization must always be within the limits set by the internal regulations in force.
- c) Travel and accommodation expenses generated by the participation in events / presentations / receptions of members of the Management or employees are always fully insured / borne by the organization, within the limits set by internal regulations.

5.3 Facilitation payments (aimed at business relationships)


These payments are informal benefits intended to facilitate and expedite an action or procedure to which the person making the payment is otherwise entitled. The Organization rejects this practice and will not make such a payment when requested to do so.

5.4 Sponsorship

As part of its social responsibility, the organization offers sponsorships to certain organizations and individuals. Sponsorships may only be granted in accordance with applicable relevant legislation, applicable statutory and internal regulatory documents. The organization's management and staff may not directly or indirectly request or accept any monies directly or indirectly in exchange for a sponsorship.

5.5 Conflicts of interest

- a) The organization's management and staff must avoid any conflicts of interest with regard to their position, work and their own person. They must refrain from any activity that is contrary to the interests of the organization and must make decisions in an impartial, equidistant and transparent manner.
- b) The organization's management and staff must report any actual or potential conflicts of interest between the interests of the organization and their own interests or the interests of their relatives/relatives up to and including the second degree (both their own and related to the organizations to which they belong).
- c) In order to avoid conflicts of interest that may negatively affect the image and work of the organization, do not engage or promote (as appropriate):
 - 1) Staff who are married to or in a relationship of kinship or affinity up to and including the second degree of kinship or affinity with an existing employee of the organization in a managerial position and who would have a direct reporting relationship to that employee by virtue of their employment;
 - 2) Staff who are to occupy a management position and who are married to or in a relationship of kinship or affinity up to and including the second degree with an existing employee of the organization who would become a direct subordinate of the organization. In a situation where a post could not be filled repeatedly (at least two successive unsuccessful recruitments) due to the above restrictions, the management of the organization may approve the filling of the post after implementing job-specific measures to avoid the manifestation of a conflict of interest (e.g. an affidavit from both employees that they have not and are not in conflict of interest);
- d) In order to avoid potential negative effects on the organization, each candidate participating in a recruitment in the organization declares prior to employment/promotion:
 - 1) If he/she is married or if he/she is in a relationship of kinship or affinity up to the second degree inclusive with the employee of the organization in a management position (defined according to the Internal Regulations / Rules of Organization and Functioning), with whom he/she would be in direct subordinate relations;

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- 2) If he/she would occupy a management position (defined according to the Internal Rules / Rules of Organization and Functioning), if he/she is married or if he/she is in a relationship of kinship or affinity up to the second degree inclusive with the employee of the organization who would become his/her direct subordinate;
- 3) If he or she has been convicted by a final judgment of corruption, on the basis of which he or she is barred from holding the office for which he or she is running;
- e) The organization monitors through the Human Resources Department the relationships of marriage, derudence and deity up to and including the second degree between employees, in order to prevent situations that may generate conflicts of interest. The identification of such situations will be communicated to the management, which must decide on the measures necessary to clarify the situation.

5.6 Identifying / Assessing corruption risks and implementing corruption prevention measures

- a) A bribery risk assessment is carried out to prevent corruption
- b) In view of the negative effect of the manifestation of an act of corruption, each member of the Management and each employee must constantly analyze his or her activity from this point of view and, when he or she notices that such an act is possible, must report this situation to his or her superior.
- c) At the beginning of each calendar year, by February 15, each member of Management and employee completes a statement of compliance with the requirements of the Code of Ethics, which is submitted to the Human Resources Department.

6. Mutual respect

The organization ensures the identification and compliance with legal regulations on the prevention and sanctioning of all forms of discrimination and failure to respect equal opportunities and unequal treatment between women and men through the Human Resources Department.

6.1 Discrimination


The organization seeks to create a work environment where individual differences are accepted and valued. Appositive or negative discrimination of any kind based on a person's actual or presumed attributes - including, but not limited to, skin color, gender, nationality, sexual or ideological belief, gender identity, ethnicity, disability, sexual orientation, political or other views, marital status, and so on - is prohibited.

6.2 Harassment

- a) The organization prohibits and does not tolerate unprofessional language and abusive, discriminatory, threatening behavior based on intimidation or physical or psychological harassment of employees, especially if by its use, employees are forced to perform actions that are not in compliance with the organization's normative documents or applicable legal regulations.
- b) Any verbal, non-verbal or physical form of behavior which is intended to or results in injury to the dignity of the person concerned or which creates a humiliating and offensive environment is prohibited.
- c) If an employee feels that he or she has been the victim of harassment in any of the above forms, he or she will notify the Human Resources manager, who will then investigate the case and propose to the management that appropriate action be taken.

7.Financial reporting

The organization prepares, presents and publishes its financial reports in accordance with generally accepted accounting principles and applicable legal regulations. The reports shall contain the Organization's financial position and the results of its operations in all material respects, thereby ensuring the provision of accurate information.

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8. Competition

- a) The organization promotes competition, with the conduct of contractual relationships in an honest and lawful manner, based on efficient and fair practices, with a long-term perspective.
- b) The organization shall refrain from any conduct that could lead to the restriction of competition on the market or abuse of its economic position. Such conduct may include, among others, entering into unfair economic competition (in a way that violates or endangers the legitimate interests of customers, competitors and/or partners), making or accepting proposals aimed at agreeing to price overcharges, exchanging marketing information that affects competition or divides the market and customers (cartel agreement) and discussing issues relevant from the perspective of restricting competition (e.g. prices, costs, marketing strategies) in meetings of professional organizations representing commercial interests.
- c) Employees must conduct themselves in their day-to-day activities involving competitors and business partners of the organization in full knowledge of their responsibilities under the conditions imposed by competition law.

9. Insider trading

- a) Management and certain employees of the organization may obtain inside information in the course of their day-to-day activities, which they must not use in any way. The Organization sanctions the use of inside information.
- b) Insider trading is subject to regulations formulated in the applicable legislative framework including but not limited to: Criminal Code, the Capital Market Law, the relevant legislation adopted by the European Union, as well as the organization's internal regulatory documents.
- c) In accordance with its internal regulatory documents, the organization takes all necessary measures to prevent and prohibit the use of inside information.

10. Confidentiality

- a) One of the essential requirements for the confidential relationship between the organization and its customers/partners is the strict protection of business secrets and confidential information relating to customers/partners. The organization shall at all times maintain the confidentiality of data, information and documents related to its clients/partners and the relationship between them and the organization.
- b) The employees of the organization must respect the obligation of confidentiality, even after the termination of their positions or the termination of their employment or collaboration relationship, for a period of 2 years.
- c) Employees must refrain from formally or informally sharing any information about the organization's activities when this is not necessary for business relationships, nor about the employee's duties and matters involving persons who are not employees or business partners of the organization.
- d) The protection and preservation of business secrets must take place in accordance with the relevant provisions of the Civil Code, the Criminal Code, company law, as well as the organization's internal regulatory documents.
- e) The obligation of confidentiality shall continue to exist even after the termination of the employment or cooperation relationship for an unlimited period of time.