



**TOTAL**  
INTERNATIONAL

## Supplier & Contractor Ethics Policy

### Introduction

Total International is firmly committed to principles of Integrity, Conflicts of Interest, Confidentiality, Anti-bribery and Fair Marketing.

Total International's dialogue with its suppliers and contractors is fundamental for setting up relationships based on transparency and honesty, creating a bond of collaboration that reports mutual benefits. Together with our other stakeholders, our suppliers provide us with extremely valuable information that helps us improve our activities and optimize our service processes.

Total International has a high undertaking to transmitting its corporate principles and values to its suppliers and contractors seeking to foster in them lines of behavior that are both ethical and responsible. Accordingly, Total International has drawn up this code of ethics to lay down an undertaking with its suppliers and contractors, where both parties declare their respect for and fulfillment of the principles outlined below.

### Our Principles

*Integrity* - Total International operates in a professional, independent and impartial manner in all its activities.

Total International carries out its work honestly and does not tolerate any deviation from its approved methods and procedures. Where approved test methods make provision for tolerances in results, we ensure that such tolerances are not abused to alter the actual test findings.

Total International reports data, test results and other material facts in good faith and does not improperly change them, and only issues reports and certificates that correctly present the actual findings, professional opinions or results obtained.

*Conflicts of interest* - Total International avoids conflicts of interest with any related entity in which it has a financial or commercial interest and to which it is required to provide services. We avoid conflicts of interest between our companies and/or divisions engaged in different activities but which may be providing services to either the same client or each other. We ensure that our employees avoid conflicts of interest with all activities that are conducted on behalf of Total International.



*Confidentiality* - Total International treats all information received in the course of the provision of its services as business confidential to the extent that such information is not already published, generally available to third parties or otherwise in the public domain.

*Anti-bribery*- Total International prohibits the offer or acceptance of a bribe in any form, including kickbacks on any portion of a contract payment. We prohibit the use of other routes or channels for provision of improper benefits to, or the receipt of improper benefits from, customers, agents, contractors, suppliers or employees of any such party or government officials.

*Fair Marketing* - Total International only presents itself and conducts marketing, including comparisons with, or references to, competitors, or their services, in a manner that is truthful, not deceptive or misleading or likely to mislead.

## **Our Employees**

Total International requires that these principles are accepted and held to the highest of standards by all of its employees. As a commitment to the success of this program all employees are required to review and sign a declaration of the acceptance of these terms and apply them in all aspects any of business transaction. Individual compliance is evaluated on an annual basis or as a potential violation is investigated.

A copy of the employee “Business Conduct, Code of Ethics & Compliance Policy” (TI-000038) can be requested from the Compliance Officer. Please request to the contact information provided below.

## **Our Expectations**

Total International expects that all of our suppliers and contractors uphold and adopt these same principles and business conduct. The implementation of the principles throughout our organization, with our suppliers and contractors will result in success and compliance in all business transactions.

Further definition of the principles and conduct that we expect our suppliers and contractors to review and comply with can be found in International Federation of Inspection Agencies Compliance Code. This document is located on the International Federation of Inspection Agencies (IFIA) website ([www.ifia-federation.org](http://www.ifia-federation.org)). It can also be issued upon request to our compliance officer.

## **Top Management**

Total International's top management is committed to the success of this compliance program and has taken appropriate measures to ensure the continual improvement of its policies and procedures that govern all business transactions. Through implementation of our ISO9001:2008 quality management system and IFIA's Compliance Code we have laid a foundation to optimize and benchmark all of our policies and procedures. Both of these recognized organizations are notified of any and all findings that may be observed during



the annual external audits required to be performed by an independent third party. Our top management just like our staff, suppliers and contractors make this same commitment and declaration to abide these principles and business conduct.

### **Acceptance of the Code of Ethics for Suppliers**

In the present and future commercial relations between Total International and its suppliers and contractors, the latter will be asked to accept and sign a written commitment to the principles provided in this code of ethics.

### **ACCOUNTABILITY FOR VIOLATIONS**

If the Company or its designee determines that this Code has been violated, either directly, by failure to report a violation, or by withholding information related to a violation, the offending supplier or contractor may be disciplined for non-compliance with penalties up to and including loss of contract and removal from Approved Supplier List. Violations of this Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending Company. All suppliers / contractors are expected to cooperate in internal investigations of misconduct.

Total International has appointed a Compliance Officer to review violations and provide an open line of communication to Top Management for employees to report any observations. These observations will be reviewed for violation and integrity.

### **TOTAL INTERNATIONAL**

#### **SUPPLIER / CONTRACTOR ACKNOWLEDGMENT**

I HEREBY ACKNOWLEDGE THAT I HAVE READ AND I UNDERSTAND THE TOTAL INTERNATIONAL CODE OF BUSINESS CONDUCT AND ETHICS.

I AGREE TO CONDUCT ALL TRANSACTIONS IN A MANNER CONSISTENT WITH THE POLICIES AND PRACTICES SET FORTH IN THIS CODE.

\_\_\_\_\_  
(Name, Please Print)

\_\_\_\_\_  
(Company Name)

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

### ***Please return completed forms to:***

Contact Information

Joshua Boldra (Compliance Officer)

[Joshua@totalint.co](mailto:Joshua@totalint.co)

Phone: (213) 365-5504