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## 1. Purpose

The Code of Ethics aims to present the values and ethics that **Trust CHECK** is committed to respecting and to establish the responsibilities of **Trust CHECK** professionals.

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## 2. Scope

Our Code of Ethics applies to all **Trust CHECK** professionals.

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## 3. Terms and definitions

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| <b>Trust CHECK</b> professionals | <i>Employees and external consultants are hereinafter referred to as "<b>Trust CHECK</b> professionals."</i>                                                            |
| Ethics                           | Adapted from the definition of "Professional Ethics" in the Psychology Dictionary: Standards and rules of conduct that <b>Trust CHECK</b> professionals must adhere to. |
| Values                           | <i>Beliefs to which an organization adheres and the standards it intends to observe. (ISO 22300:2021, clause 3.1.287)</i>                                               |

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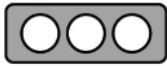
## 4. Introduction

The Code of Ethics represents the values and ethics that **Trust CHECK** is committed to upholding, as it recognizes their importance in the provision of services and customer loyalty. The Quality Manager ensures that **Trust CHECK** professionals comply with this Code of Ethics. In addition, the Quality Manager constantly reminds staff of the need to behave in a professional, responsible, competent, and fair manner when providing services to internal and external stakeholders.

**Trust CHECK** believes that organizational success requires a thorough understanding of the needs and expectations of customers and stakeholders. To achieve this, **Trust CHECK** promotes a culture based on the highest levels of integrity, professionalism, and fairness.

**Trust CHECK** believes that strong ethical values are essential to maintaining healthy and strong relationships. Therefore, it is **Trust CHECK's** primary responsibility to ensure that its professionals behave in a manner that is fully consistent with the principles and values it upholds. All **Trust CHECK** professionals are required to understand and comply with this Code of Ethics when working for, on behalf of, and with **Trust CHECK**.

Each **Trust CHECK** professional is required to understand these principles and ensure that they are successfully implemented in those aspects of their work or procedures that fall within their area of



responsibility. Anyone who is unaware of the existence of a procedure mentioned in this document or who requires further clarification is invited to contact **Trust CHECK**.

**Trust CHECK** understands that success is not possible without mistakes. Organizations cannot improve if they fail to identify and correct these mistakes. That is why **Trust CHECK** has implemented procedures to resolve issues, provide feedback, listen, and find solutions to stakeholder concerns and problems. As part of the continuous improvement process, **Trust CHECK** ensures that all issues are addressed in a timely and responsible manner. Teams can understand and respond to stakeholder concerns and needs. It trains employees in methods and techniques for investigating the root causes of issues raised and taking action to eliminate them. Due to its particular interest in ISO standards, **Trust CHECK** has learned and implemented related best practices. Its teams have the skills to analyze and comply with international standards requirements and have incorporated them into procedures. **Trust CHECK** is aware that any violation of this Code of Ethics will have a negative impact on its reputation. Consequently, it has established an appropriate procedure for handling all forms of complaints. This applies in the event of a complaint or appeal received from any party affected by **Trust CHECK's** rules, policies, procedures, decisions, or general operations.

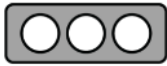
## 5. Responsibility of **Trust CHECK** professionals

**Trust CHECK** professionals are required to:

1. Apply the quality management system established by the verification body in accordance with the requirements of ISO/IEC 17029
2. Behave professionally when providing services by demonstrating honesty, accuracy, fairness, and independence
3. Act at all times in the services they provide solely in the best interests of their employer, their clients, the public, and the profession, in accordance with this Code of Ethics and other professional standards
4. Be competent in their respective fields and strive to continuously improve their skills and knowledge
5. Offer only services for which they are qualified and competent and adequately inform clients of the nature of the services offered, including any relevant concerns or risks (impartiality, conflict of interest, etc.)
6. Inform their employer or client of any commercial interest or affiliation that could influence or alter their judgment
7. Disclose to **Trust CHECK** all commercial ties (including consulting activities<sup>1</sup>, internal auditing<sup>2</sup>, etc.), family ties, and conflicts with companies.

<sup>1</sup> Consulting includes but is not limited to the following activities: On-site training on information security procedures or measures other than generic ones; Engineering of information security policies or measures; Technical assistance from design to implementation of information security policies or measures. Consulting does not include: Use of shared databases; Generic training given to multiple organizations without specific case studies from an organization involved.

<sup>2</sup> Internal auditing is not considered consulting.

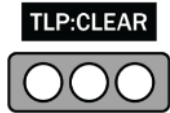


8. Maintain the confidentiality of information relating to any current or former employer or client during and after the provision of services
9. Comply with all applicable laws and regulations in the jurisdictions of the country where the services are provided.
10. Respect the intellectual property and contributions of others.
11. Do not intentionally communicate false or falsified information that could compromise the integrity of the process or a **Trust CHECK** verification program
12. Do not falsely or fraudulently represent yourself as a representative of **Trust CHECK**
13. Do not misuse references to **Trust CHECK** or government entity (Belac) logos, documents, accreditation, or verification notices.
14. Do not act in a manner that could damage the reputation of **Trust CHECK**, its accreditations, or its verification programs
15. Cooperate fully with any investigation conducted following an alleged breach of the Code of Ethics
16. Provide only accurate information. Teams shall ensure that all information shared or disseminated publicly complies with **Trust CHECK's** quality, information security, and data protection policies.
17. If any condition prevents an employee from complying with the above commitments, they are required to inform their line manager immediately.

If **Trust CHECK** professionals find themselves in a situation that could violate this Code of Ethics, they should ask themselves the following questions:

- Do I suspect that the course of action taken may be illegal or unethical?
- How am I involved?
- What principles or rules are being violated?
- Could this action damage my professional and personal reputation?
- Does the proposed course of action involve deceptive and/or dangerous behavior?
- Could the proposed action harm **Trust CHECK** (directly or indirectly) or its reputation?
- Does the proposed course of action have a legitimate business purpose and is there an alternative solution?

If the proposed course of action does not answer any of these questions, **Trust CHECK** professionals must seek advice from the quality manager and reconsider their decision. Under no circumstances should they ignore the existence of a problem.



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## 6. Non-compliance with the Code of Ethics

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Any **Trust CHECK** professional who fails to comply with this Code of Ethics will be subject to disciplinary measures, up to and including termination of the contract/agreement, and in cases where the consequences are serious, legal action will also be taken.

This is why **Trust CHECK** emphasizes the importance of this Code of Ethics, as it aims to encourage its professionals to behave in a professional and exemplary manner when providing services.

## 7. **Trust CHECK's** strategic vision

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### 7.1 Integrity

**Trust CHECK** fully understands the importance of honesty and integrity in the provision of services. That is why **Trust CHECK** is firmly committed to providing services with absolute honesty, accuracy, and integrity.

### 7.2 Respect and Dignity

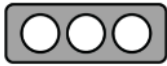
**Trust CHECK** cares about its relationships with its stakeholders. It treats them with respect and dignity. It ensures that no behavior or decision by **Trust CHECK** is offensive or discriminatory towards them, but always complies with fundamental and universal human rights. **Trust CHECK** treats its stakeholders with the utmost respect, without discrimination based on race, gender identity, age, religion, or sexual orientation. **Trust CHECK** does not tolerate any form of physical altercation, harassment, discriminatory or offensive behavior towards a person because of their disability, gender identity, race, religion, or sexual orientation. **Trust CHECK** encourages freedom of speech and the expression of opinions by fostering a work environment that promotes multicultural awareness and tolerance.

### 7.3 Impartiality

When providing services, maintaining complete impartiality is fundamental to **Trust CHECK**. The organization's policies and procedures are designed to guarantee impartiality and ensure that services are provided in an unbiased manner. **Trust CHECK** devotes considerable time to verifying each source of information in order to avoid any potential conflicts of interest and preserve impartiality. The organization's goal is to inspire and maintain complete confidence in the services provided by **Trust CHECK**.

### 7.4 Conflict of interest

**Trust CHECK** encourages all its professionals to report (to [office@trustcheckweb.com](mailto:office@trustcheckweb.com)) any cases that may present a conflict of interest. It is important that all conflicts of interest are identified, mitigated, and managed. In addition, it is mandatory that these conflicts of interest are documented and that additional measures are taken to resolve them.



## 7.5 Confidentiality

All information obtained in the course of providing services must be treated as confidential and protected at all times, regardless of the medium on which it is communicated, shared, or stored.

**Trust CHECK** professionals must never share confidential information without the prior written consent of the other party. **Trust CHECK** professionals must understand the importance of information confidentiality and the consequences of disclosure without prior consent, as they will be held accountable for such actions.

## 7.6 Information Security

Information security involves protecting information from a wide range of threats in order to ensure business continuity, minimize business risks, and maximize return on investment and business opportunities. **Trust CHECK's** priorities in information security are as follows:

- Understand strategic and operational risks related to information security and address them accordingly
- Protect the confidentiality, integrity, and availability of stakeholder information

Here are the 10 golden rules of data protection (source: Belgian Cybersecurity Center):

|                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <b>Protect your accounts with strong authentication!</b><br>Always use multi-factor authentication (MFA) whenever possible! <ul style="list-style-type: none"> <li>• Long passwords are more effective because they are more difficult for cybercriminals to crack, given the many possibilities offered by the number of characters.</li> <li>• Strong passwords are at least 14 characters long, are not easy to guess, and contain: uppercase letters, lowercase letters, numbers, and special characters (&amp;, \$, %, !, =, +, etc.).</li> </ul> |
|  | Use different passwords for work and personal accounts                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|  | Store all your data in a system where backups are performed regularly and centrally.                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|  | Run security updates on all your devices as soon as they become available.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|  | Never leave physical information (e.g., paper documents) or devices unattended on your desk.                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|  | Avoid public Wi-Fi networks and use a "virtual private network (VPN)".                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                     | <b>Avoid phishing by asking yourself the following questions:</b> <ul style="list-style-type: none"> <li>• Is the sender someone I know?</li> <li>• Was I expecting a message on the subject mentioned?</li> </ul>                                                                                                                                                                                                                                                                                                                                     |



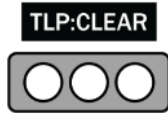
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|    | <ul style="list-style-type: none"> <li>• Does the message ask for information such as a username, password, or bank account number?</li> <li>• Is it urgent?</li> <li>• Where does the link lead? (Place your cursor over the link without clicking.)</li> <li>• Does the message contain a QR code?</li> <li>• Is it addressed to me personally?</li> <li>• Does the message contain spelling mistakes?</li> <li>• Is the message in the Spam/Junk Mail folder?</li> <li>• Is someone trying to arouse my curiosity?</li> <li>• Is a payment being requested?</li> </ul> <p><b>How should I respond to a phishing email?</b></p> <ul style="list-style-type: none"> <li>• Do not reply to these messages, open attachments, or click on links.</li> <li>• Never provide bank details requested by text message or email.</li> <li>• Report the phishing attempt to <a href="mailto:office@trustcheckweb.com">office@trustcheckweb.com</a> and delete the email/text message.</li> </ul> |
|  | <p>Follow these steps when handling internal or confidential information:</p> <ul style="list-style-type: none"> <li>• Lock your computer if you leave it unattended.</li> <li>• Do not leave computers or documents unattended on desks outside of working hours.</li> <li>• Do not leave documents unattended in printers.</li> <li>• Always be aware of your surroundings when viewing or discussing confidential information in public places. Try to isolate yourself as much as possible to prevent anyone from overhearing a conversation.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                             |
|  | <p>Only use official websites and platforms to download applications and software. Avoid downloading software.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|  | <p>Report all information security incidents to <a href="mailto:office@trustcheckweb.com">office@trustcheckweb.com</a>. Always contact us in the following cases:</p> <ul style="list-style-type: none"> <li>• if you have questions or comments about this document;</li> <li>• if you notice anything that contradicts this document;</li> <li>• a suspected or confirmed incident occurs.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

## 7.7 Competence

All **Trust CHECK** employees are competent and qualified in their field. They are also aware of the roles and responsibilities they must assume in order to achieve the organization's objectives and meet stakeholder expectations. In this regard, the strategy is primarily focused on identifying the nature of problems by analyzing root causes and providing solutions with a view to efficiency and satisfaction. **Trust CHECK** continuously trains its employees to increase their knowledge and develop their skills so that they can consistently meet stakeholder demands.

## 7.8 Anti-corruption policy

**Trust CHECK** fully supports the fight against corruption. As such, the organization rejects all forms of corruption, whether direct or indirect, including bribes and the use of funds or assets for unethical purposes. This categorical rejection of corrupt practices also includes the use of other means to obtain undue advantages from or for partners or any other stakeholders. To this end, it is prohibited to offer,



solicit, accept, or grant any undue advantage—financial or otherwise—for the purpose of influencing a decision, obtaining favorable treatment, or distorting the objectivity of an evaluation or verification process.

Gifts, invitations, or benefits may only be accepted or offered if they are:

- of low symbolic value (<€100),
- in line with local professional customs,
- occasional and transparent,
- and have no real or perceived influence on the independence of judgment.

In case of doubt, employees should contact the organization's management or [office@trustcheckweb.com](mailto:office@trustcheckweb.com)

## 7.9 Environmental awareness

**Trust CHECK** is aware of the damage and external effects of unconscious human actions on the natural environment. Consequently, the organization seeks to improve its business processes to achieve an ideal level of environmental protection and operate in the best possible way.

## 8. Contact us

If a stakeholder witnesses a violation of this Code of Ethics by **Trust CHECK** professionals, they are strongly encouraged to contact **Trust CHECK** at the following address: [complaints@trustcheck.be](mailto:complaints@trustcheck.be). **Trust CHECK** is committed to investigating each case to the extent necessary to ensure compliance with the highest ethical standards.

**Trust CHECK** encourages anyone with questions, concerns, or issues regarding this Code of Ethics to contact us.

## 9. Assessment of impartiality risks

The risk of bias is identified and analyzed on an ongoing basis in accordance with the PR2 Bias Management procedure. Staff are required to declare any relationships (business<sup>3</sup>, family, conflicts) by completing the list below annually. Other measures are described in the PR2 Bias Management procedure.

Declaration of contractual relationships and all activities\* carried out in the last five years:

| Company | Type of relationship |
|---------|----------------------|
|         |                      |

<sup>3</sup> Consulting, internal audit, external audit, etc.



Distribution:  
external

*\* By extension, this declaration requires you to declare anything that connects you, your company, and any individuals in your family or circle of friends, as it applies to any company with which you, any member of your family, or anyone in your circle of friends has a contract, an interest-bearing shareholding, bonds or options entitling you to dividends, including real estate or construction companies, and lobbying firms or business circles with which you may be even indirectly linked and which could provide benefits in kind in return for interest.*

Done at, on YYYY

Name:

TLP: CLEAR



Distribution:  
external

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Signature: