NSF International
Code of Ethics

A Message From Kevan P. Lawlor:

Dear Colleagues,

Thank you for your efforts in establishing NSF International as a highly trusted, independent organization that positively impacts human health in almost every continent in the world. As we look to the future, it is vital that we never veer from the core values that have earned us our reputation for integrity, trust and confidence:

- We demand the highest ethics and integrity.
- We operate using sound scientific principles.
- We respect and care for one another.
- We promote personal and professional growth.
- We foster innovation and creativity.
- We demonstrate social and environmental responsibility.
- We are committed to winning and being the best.

This Code of Ethics reflects our continued commitment to these core values and includes instructions we must all follow if we are presented with ethical questions or observe conduct we suspect may be unethical or illegal.

Our Board of Directors and our senior leadership team are committed to this Code of Ethics and to ensuring each of us continues to follow the principles and guidelines set forth here as we perform our day-to-day activities at NSF International. I am confident I can count on each of you to join me, the board and the leadership team in this commitment. Together, we will continue to demonstrate to our customers, our suppliers and other business partners, our employees and each other that NSF International is truly a leading organization.

Kevan P. Lawlor
President & Chief Executive Officer
NSF International

July 2, 2018
Introduction

NSF International, along with its global subsidiaries (collectively, “NSF” or the “Organization”), recognizes that a reputation for integrity, trust and confidence is of paramount importance and is dependent upon the personal and professional conduct of its officers and employees. Persons who represent NSF are expected to:

- Adhere to the highest personal and professional standards in their dealings with customers, the public and other employees
- Comply with all laws and regulations applicable for the region, country, province state and/or local area
- Assure the advancement of NSF’s interests
- Remain free from influences that could impair, or appear to impair, impartial, objective judgment or action

Compliance with the requirements of NSF’s Code of Ethics (also referred to herein as the “Code of Ethics” or “Code”) is a condition of continued employment or further work on behalf of the organization. Each person must avoid activities and interests that actually conflict, have the appearance of conflicting or could lead to conflicting with the best interests of NSF.

NSF’s mission to protect and improve human health is the guiding principle of this Code of Ethics. Those covered by this Code are expected to do their utmost to advance NSF’s interests and to recognize they represent NSF directly and indirectly each day in their personal and professional dealings. This Code is a statement of key principles for individual and business conduct; it is not a substitution for the Organization’s other policies and procedures.

Scope

This Code of Ethics applies to all employees, officers, directors, independent contractors, contract or temporary employees, agents of NSF and those persons who act on behalf of NSF; for ease of reference only, these persons shall be referenced in this document as “employees”, “you”, “your” or the “Covered Persons”. Nothing in this Code shall create an employment relationship with NSF where one does not exist. As used herein, “NSF” shall mean NSF International, along with all of its direct or indirect subsidiaries, affiliates and related companies.

Meeting Our Shared Obligations

Each of us is responsible for knowing and understanding the policies and guidelines contained in this Code, and for reporting any suspected violations. If you have questions, ask them; if you have ethical concerns, raise them. The General Counsel, who is responsible for overseeing and monitoring compliance with this Code, and the other resources set forth in this Code are available to answer your questions and provide guidance and for you to report suspected misconduct. Our conduct should reflect the Organization’s values, demonstrate ethical leadership and promote a work environment that upholds the Organization’s reputation for integrity, ethical conduct and trust. Reports of violations of this Code should be made according to the procedures set forth below.
Compliance With Laws, Rules and Regulations

NSF conducts all aspects of its business honestly and in compliance with all applicable laws. NSF is subject to laws and regulations in all of the countries in which we operate. Violation of governing laws and regulations is unethical and subjects both the individual involved and the Organization to significant risk of fines, penalties and damaged reputation. Obeying the law, both in letter and in spirit, is the foundation on which this Organization’s ethical standards are built. All Covered Persons must respect and obey the laws of the cities, states and countries in which we operate. Although not all Covered Persons are expected to know every law that is applicable to the Organization, it is important to be familiar with those laws that apply to your areas of responsibility and to know enough to determine when to seek advice from the Organization’s General Counsel.

Conflicts of Interest

While NSF does not wish to interfere with personal affairs or control time away from work, it does expect vigilance to recognize situations that give rise to potential, perceived or actual conflicts between personal interests and those of NSF. Your position with NSF is never to be used to promote or advance personal interests, directly or indirectly.

You should refrain from engaging in outside employment or other activities (personal or financial) that conflict with your duties and responsibilities to NSF. You should report to your supervisor, or responsible person, any outside employment or other activity that may lead to such a conflict, and discontinue such conflicting outside employment or activity upon request of NSF. Contractors must disclose any potential, perceived or actual conflicts prior to engaging with NSF.

Your position with NSF should not be used directly or indirectly for private gain, advancement or personal interest, or to obtain benefits for yourself, customers or suppliers. You should avoid direct or indirect dealing on behalf of NSF with any person or firm with whom you or members of your immediate family have any financial interest. You should not be involved with any aspect of the evaluation or certification of a product or management system if you or members of your immediate family have been involved in the previous two years in activities outside of NSF with the organization being evaluated. As promptly as possible upon learning of a potential, perceived or actual conflict of interest, you must such potential, perceived or actual conflict to the attention of the appropriate responsible person, which may be your supervisor or the NSF General Counsel. Acceptance of any business or employment activity at any time which would conflict with NSF’s interests is discouraged.

Positions of Leadership Outside of NSF

NSF encourages interest and participation in all levels of government and public policy. However, care should be exercised so that political activity or participation does not reflect on or cause
embarrassment to NSF. Any efforts on behalf of NSF must be coordinated and under the direction of the executive leadership of the Organization.

NSF recognizes the value of having you serve as a director or member of outside boards of not-for-profit corporations or business entities where there is no conflict of interest with NSF. NSF also encourages you to become and remain active in community/charitable organization and activities. As a corporate citizen, NSF recognizes the importance of supporting organizations and activities that enhance the community, encourage growth and provide assistance to those in need.

Prior to accepting a position on a board of directors or other managing body of any organization that does or seeks to do business with NSF, you must obtain the consent of NSF. You must disclose all positions referenced in this section to NSF on an annual basis.

This Code of Ethics does not preclude and is not intended to interfere with employees engaging in legally protected activities protected by state or federal law, including the National Labor Relations Act or any country equivalent.

**Competition and Fair Dealing**

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, not through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, inducing such disclosures by past or present employees of other companies, or engaging in conduct that would violate applicable antitrust laws, is prohibited. Each Covered Person should endeavor to respect the rights of, and deal fairly with, the Organization’s customers, suppliers, competitors and employees. No Covered Person should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other intentional unfair-dealing practice.

**Discrimination and Harassment**

NSF will recruit, hire, train, promote, administer policies, base decisions and conduct all personnel activities without regard to race, color, religion, age, national origin, sex, disability (to the extent an undue hardship is not imposed) or veteran status. Further, the Organization commits to maintaining a professional work environment free of intimidation or harassment or workplace bullying of any kind. Therefore, harassment, whether based upon sex, age, race, color, religion, national origin, disability or any other characteristic, is a violation of this Code of Ethics.

Harassing conduct includes epithets, slurs, negative stereotyping, threatening, intimidating or hostile acts, or the display of written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age or disability.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature where submission to such conduct is imposed as a condition
of employment or the basis for decisions affecting employment or where such conduct creates an intimidating, hostile or offensive working environment.

NSF believes that it is the responsibility of all Covered Persons to ensure that the workplace is free of discrimination or harassment, including behavior which is disruptive or which interferes with productive work relationships and job performance. Employees who have a complaint about work-related discrimination or harassment by anyone — supervisors, co-workers, visitors or customers — should, as promptly as possible, bring the incident to the attention of their immediate supervisor, their Human Resources representatives, the General Counsel, or any manager with whom they feel comfortable talking.

The Organization will investigate each claimed incident of discrimination or harassment and, if it is determined that the complaint is valid, will take immediate and appropriate corrective action up to and including immediate discharge, regardless of any other Organization policy that sets forth a process of graduated warnings prior to termination. Employees making complaints of conduct they reasonably believe to violate this policy will be protected against retaliation.

**Conditions of Employment; Human Rights**

NSF greatly respects the rights of all humans. We will not use child labor; in no event will NSF employ any person below the age of 15, unless as part of a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.

NSF will promote its employees’ material well-being by providing compensation and benefits that are competitive and that comply with applicable laws. We will not use forced labor in any form and will not tolerate physically abusive disciplinary practices. We will comply with applicable laws regarding hours of work. NSF recognizes and respects its employees’ right to associate freely and bargain competitively. The Organization will work constructively with recognized employee representatives to promote the interests of its employees. In locations where there are not recognized employee representatives, the Organization will provide opportunities for employee concerns to be heard.

**Modern Slavery and Human Trafficking**

NSF is committed to understanding more about modern slavery and improving our practices to ensure that slavery and human trafficking are not present in our business or supply chain. We will not condone human trafficking or slavery in our operations or our supply chain.

**Health and Safety; Use of Alcohol and Drugs**

NSF strives to provide each employee with a safe and healthy work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following health and safety rules and practices and promptly reporting accidents, injuries and unsafe equipment, practices or conditions.
Violence and threatening behavior are not permitted. Employees should report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol. The consumption of alcohol or the use of illegal drugs in the workplace will not be tolerated.

**Anti-Corruption / Gifts, Meals and Entertainment**

NSF strictly prohibits any form of corruption and/or commercial or governmental bribery as those terms are or may be defined in your local jurisdictions. In no case does NSF permit, sanction or endorse, either directly or indirectly, any gifts to local or national governments that would expedite or secure approvals on behalf of NSF International.

Material gifts of any kind, from current or potential customers or suppliers must be courteously and tactfully declined. Material gifts include (1) gifts over US$250 in value, (2) entertainment with an aggregate estimated value in excess of $250 (3) gifts of any value that would be perceived by the general public as intended to undermine an employee’s fiduciary duty to NSF. Employees may accept gifts or entertainment with a value of less than US$250 from customers and suppliers if they are unsolicited and it is clear that the customer or supplier is not trying to influence the employee in connection with a transaction. Acceptance of cash, commissions, fees, discounts, side agreements or other propositions involving personal gain are strictly forbidden. In all relationships and transactions with customers or vendors, good judgment and high ethical standards are the expected NSF standards.

**Recordkeeping**

NSF requires honest and accurate recording and reporting of information in order to make responsible business decisions. All of the Organization’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Organization’s transactions and must conform both to applicable legal requirements and to the Organization’s accounting policies and related system of internal controls.

**Confidentiality**

All information obtained from the relationships among NSF and its customers, prospective customers and suppliers is confidential and must be used solely for NSF business purposes. Covered Persons must not disclose confidential information entrusted to them by NSF or its customers, prospective customers or suppliers, except when disclosure is authorized by such customer, prospective customer, supplier, or the Legal Department or is required by laws, regulations or accrediting bodies. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Organization or its customers, prospective customers or suppliers if disclosed. The obligation to preserve confidential information continues even after employment ends.

**Use of Organization Equipment**

You should use information, equipment and software that is assigned to you or that you have access to in a professional, responsible, ethical and legal manner. You are granted access
privileges by the Organization for business purposes only and you should not conduct personal business on Organization time or use its assets to further any business or personal interests, except as reasonably necessary. Non-business use of the Organization’s environment or assets may subject you to disciplinary action up to and including termination.

The obligation of employees, officers and directors to protect the Organization’s assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information violates Organization policy. It could also be illegal and result in civil or criminal penalties. Where permissible under applicable local law, any work product that is created using Organization assets is the sole property of NSF.

**Environment and Sustainability**

NSF conducts business in a manner that provides for the protection of the environment. We will, as practicable, continue to reduce and minimize the environmental impact of our operations in the short term, and work toward the development and implementation of environmentally-sustainable strategies and technologies in the long term.

**Community Engagement**

As a corporate citizen, NSF recognizes the importance of supporting organizations and activities that enhance the community, encourage growth and provide assistance to those in need.

**Social Media, Speaking to the Media**

Only designated NSF spokespersons are given permission to communicate with the media on behalf of NSF. This includes media in any form, including social media. No NSF employee, officer, director or representative should speak to the media on behalf of the organization, or post any statement on any form of social media on behalf of the organization, unless expressly authorized. All media inquiries should be directed to the NSF Communications Team.

NSF recognizes that social media is an important tool for business engagement and that those employed by or in association with NSF may use social media in a personal or professional capacity. Such use is permitted as long as there is no express or implied indication that the individual is speaking on behalf, or representing the views, of NSF. If such personal use of social media leads to media inquiries or information requiring a position or response from NSF, you must contact the NSF Communication Team, who will coordinate a response. This is to preserve your professional reputation as well as NSF’s, and ensures consistency of all public statements relating to NSF. Additionally, if any of your social media profiles (i.e., LinkedIn, Twitter, Facebook, etc.) identifies you as an NSF employee, please take care to conduct yourself on such sites in a manner that is professional and befits NSF’s values.

Any content posted to social media that is deemed as derogatory or in violation of this Code of Ethics, the NSF International Social Media Guidelines and Policy, or any other NSF policy, will
be considered a violation of NSF’s values and this Code of Ethics, and employees responsible for such content will be subject to disciplinary action by the company, up to and including termination of employment.

**Reporting any Illegal or Unethical Behavior**

If you know of, or suspect, a violation of applicable laws or regulations, the Code, or any of the Organization’s policies, you must immediately report that information as set forth below, and a failure to do so will itself be considered a violation of this Code of Ethics. *No one will be subject to retaliation because of a good faith report of suspected misconduct.* Employees, officers, directors and suppliers are expected to cooperate fully in internal investigations of misconduct. All reported violations will be promptly investigated and treated confidentially to the extent possible, given the need to conduct an investigation. It is imperative that reporting persons not conduct their own preliminary investigations. Investigations of alleged violations may involve complex legal issues, and acting on your own may compromise the integrity of an investigation and adversely affect both you and the Organization.

**Reporting Procedure**

NSF is committed to creating a culture of open and honest communication. We have created a global ethics website and hotline—called EthicsPoint—through which any employee, customer, supplier or other person may confidentially report ethics-related issues, including a suspected violation of any of the topics covered in this Code of Ethics.

**To submit a confidential, anonymous report online**, go to nsf.ethicspoint.com.

**To submit a report by telephone**, use one of the following toll-free numbers, available 24 hours a day, 365 days a year:

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<tr>
<td>Belgium</td>
<td>0-800-100-10</td>
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<td>Brazil</td>
<td>0800-892-0705</td>
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<td>Canada</td>
<td>French 1-855-883-2428</td>
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<td>English 1-855-350-9393</td>
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<td>United Kingdom</td>
<td>0808-234-2785</td>
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<td>United States</td>
<td>1-855-883-2428</td>
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**No Retaliation; Code of Ethics Administration**

NSF strictly prohibits any form of retaliation against any employee as a result of a report of a potential violation of this Policy or as a result of cooperating in an investigation of a suspected violation of this Policy.

The General Counsel is responsible for the administration of this Code of Ethics under the governance of the Audit Committee of NSF’s Board of Directors.