



Higg Facility Environmental Module (FEM) Trainer Body/Trainer Code of Professional Conduct

Version 1.1, April 2024

Document #: FEMTBCOC2024041.1

Authorization: Cascale

Acknowledgments

This document is prepared by the Verification Program Manager, Sumerra for Cascale.

TABLE OF CONTENTS

1	Introduction	3
1.1	General Information.....	3
2	Code Professional of Conduct	3
2.1	Integrity.....	3
2.2	Conflict of Interest & Impartiality	4
2.3	Confidentiality	4
2.4	Performance & Professionalism	4
2.5	Data Protection & Intellectual Property Rights	4
3	Document Change Log	5

1 INTRODUCTION

1.1 GENERAL INFORMATION

- 1.1.1 Cascale expects Trainer Bodies (TB) and Trainers vetted and approved through the Training Program Manager to acknowledge and adhere to the principles outlined in this Code of Professional Conduct.
- 1.1.2 Cascale /TPM has sole authority to:
 - 1.1.2.1 *Conduct investigations of potential Code of Professional Conduct violations.*
 - 1.1.2.2 *Determine and enforce any consequences, including suspending or permanently revoking Trainer Body (TB) or Trainer status.*
- 1.1.3 TBs and Trainers acknowledge:
 - 1.1.3.1 *That the integrity of the Higg FEM Training Program is paramount.*
 - 1.1.3.2 *That the ability to provide Higg FEM Training is a privilege, and not a right.*
 - 1.1.3.3 *That TB or Trainer status may be suspended or revoked at any time due to violations of this Code of Professional Conduct.*

2 CODE PROFESSIONAL OF CONDUCT

2.1 INTEGRITY

- 2.1.1 TBs and Trainers shall promote a culture of integrity.
- 2.1.2 TBs and Trainers shall manage and address training integrity risks that may exist before, during and after each Higg FEM Training.
- 2.1.3 TBs or Trainers shall not knowingly be a party to any illegal activity or engage in acts that are discreditable to Cascale.
- 2.1.4 TBs shall manage risks and ensure compliance with all applicable laws related to corruption.
- 2.1.5 The highest standards of integrity shall be upheld in all TB business interactions.
- 2.1.6 TBs shall have a zero tolerance policy to prohibit any and all forms of bribery and corruption.

2.2 CONFLICT OF INTEREST & IMPARTIALITY

2.2.1 Trainers shall not perform FEM Verification services for facilities where they have provided training in the same FEM cadence, except if the following circumstances:

2.2.1.1 *The training was provided to a larger group audience (e.g. attendees from multiple organizations) about general topics; and*

2.2.1.2 *Specific discussions or instruction was not directed to a single manufacturer or group of manufacturers that are owned and/or operated by the same manufacturing group.*

2.3 CONFIDENTIALITY

2.3.1 TBs and Trainers shall maintain confidentiality with respect to information gathered while executing Higg FEM Training.

2.3.2 TBs and Trainers shall take reasonable steps to prevent unauthorized access to information collected during or relating to Higg FEM Training. This includes information available on the Worldly platform.

2.4 PERFORMANCE & PROFESSIONALISM

2.4.1 TBs and Trainers shall execute FEM Trainings in accordance with the Higg FEM Training Protocol.

2.4.2 TBs shall only authorize the provision of FEM Training Certificates for those who have fully attended training sessions and completed all required activities as determined by the trainer.

2.4.3 TBs and Trainers shall facilitate and provide training feedback via TPM platform in a timely manner as outlined in the Higg FEM Training Protocol.

2.4.3.1 *Training feedback shall not be shared with any other entity outside of Cascale and TPM.*

2.4.4 TBs and Trainers shall act in a respectful manner to all training participants.

2.5 DATA PROTECTION & INTELLECTUAL PROPERTY RIGHTS

2.5.1 TBs and Trainers shall have systems in place to ensure all data is collected, stored and transferred in compliance with applicable law, is secure, and only accessible to authorized persons.

2.5.2 TBs and Trainers shall adhere to the following rules to ensure they are protecting information collected during all FEM Trainings:

2.5.2.1 *TBs and Trainers shall ask permission from facility staff when accessing or leveraging information related to facility training.*

- 2.5.2.2 *TBs and Trainers shall not distribute training participant information to third parties unless granted permission by training participants.*
- 2.5.2.3 *TBs and Trainers shall ensure any electronic devices are secured with a password to prevent access to facility information.*
- 2.5.2.4 *TBs and Trainers shall not discuss specific facility information obtained from the training with anyone outside of the facility management staff, Cascale or the TPM, and only as necessary to provide feedback for the training program.*
- 2.5.3 *TBs and Trainers shall respect intellectual property rights.*
- 2.5.4 *TBs and Trainers may come across sensitive information during the course of a FEM Training. Sensitive information may include, innovative designs or processes, price sensitive information, strategy documents, and any other information which differentiates the facility providing them with a competitive advantage.*
 - 2.5.4.1 *Sensitive information shall be considered confidential and shall not be shared with any person or organization.*
 - 2.5.4.2 *TBs and Trainers shall not request or use sensitive information as part of an FEM unless necessary for the training.*
 - 2.5.4.3 *If sensitive information is accidentally provided and is not required for training, it shall be returned immediately.*
 - 2.5.4.4 *TBs and Trainers shall not include specific details about sensitive information in the training or training feedback reporting.*

3 DOCUMENT CHANGE LOG

Date	Section	Summary of Changes
2021-10-29	n/a	<ul style="list-style-type: none"> • Inclusion of Trainer Body as responsible party • Revision of Document Format (including combination of some sections)
2024-04-30	n/a	<ul style="list-style-type: none"> • Updated for Cascale (formerly SAC) rebrand.