

BUREAU VERITAS

BUSINESS PARTNER CODE OF CONDUCT

(BPCC)

VERSION	DATE
VERSION 04	JANUARY 01, 2023

PUBLIC INTERNAL RESTRICTED SECRET

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**BUREAU
VERITAS**

<i>Business Partner Code of Conduct</i>	Revision: 04	01.01.2023
<i>Corporate & External Affairs</i>	Date done:	June 2019

Bureau Veritas conducts its business based on the following core principles: Integrity, Sustainability and Safety. We expect our Business Partners to do the same.

At all levels of our organization Bureau Veritas Group ¹ (hereinafter, “Bureau Veritas”, “our”, “we”) is committed to support high standards of Corporate Social Responsibility (hereinafter, “CSR”), including Human Rights and labour principles, health and safety at work, environment protection and anti-corruption & bribery.

The present Business Partner Code of Conduct (hereafter, “BPCC”) is a bridge to Bureau Veritas’ Business Partners (as defined hereinafter) of relevant principles contained in both Bureau Veritas’ Code of Ethics (applicable to Bureau Veritas and its staff) and our Human Rights Policy.

The BPCC defines minimum common requirements that all Bureau Veritas Business Partners shall comply with.

Applicable laws that are more specific and contractual provisions with a higher standard shall supersede these general minimum requirements.

Scope of Application

Bureau Veritas considers all contracting parties whether they are companies or individuals such as suppliers, service providers, sub-contractors, independent contractors, consultants, commercial agents or joint-venture partners to be our business partner (each a “Business Partner”). To shape better business practices, better workplaces and a better environment Bureau Veritas expects that each of its Business Partners regardless of where they operate to comply with the this BPCC.

Business Partner shall be bound to the BPCC either by reference in the contract entered with the Business Partner by a Bureau Veritas affiliate, or in separate acknowledgment (statement or certificate) signed by such Business Partner’s representative.

However, Business Partners may already have in place a compliance program or standalone corporate policies whereby they commit to comply with CSR principles that are equivalent to the ones set forth in the BPCC (hereinafter, “Business Partners’ Compliance Program”). Where such equivalent principles exist, such principles shall become binding terms in the contract with the Bureau Veritas affiliate. Bureau Veritas will not mandate the separate endorsement of our BPCC but will acknowledge such Business Partner’s Compliance Program as a valid equivalent, requiring the Business partner to be accountable for its enforcement at all times.

Implementation

The BPCC is a cornerstone of Bureau Veritas’ corporate duty of care and risk management process. The BPCC sets the minimum requirements that Bureau Veritas expects from its Business Partners with respect to their CSR.

Bureau Veritas’ teams engage with Business Partners from an early stage in the business relationship to ensure that the BPCC will be implemented in practice, including through Business Partners’ selection, onboarding and performance monitoring processes. This may include the use of questionnaires and, in certain cases, targeted audits.

In certain instances, we may assist our Business Partners with training and help raise awareness of the steps they can take to meet the standards contained in the BPCC.

We require Business Partners to either agree in writing to comply with the BPCC or provide evidence of an effective Business Partner’s Compliance Program embedding equivalent but not less demanding commitments.

We expect our Business Partners to communicate the content of the BPCC to their employees and to cascade these directions to their own business partners.

¹ Bureau Veritas Group means Bureau Veritas S.A., its subsidiaries and affiliates.

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We further expect our Business Partners to conduct self-assessments against the BPCC to understand and close any gaps.

Non-compliance with these requirements may lead to corrective measures, including termination of the business relationship.

Before assessing your own compliance program or relevant standalone policies and thereafter committing on the below principles, please **ensure that you have in hand the most current version of this document**. The latest version is accessible online among Bureau Veritas' Corporate Policies & Statements at: <https://group.bureauveritas.com/>

The principles

Business Partners must comply with the principles set forth in this BPCC or shall enforce the equivalent principles set forth in their Business Partner' Compliance Program. In addition to complying with the BPCC we expect our Business Partners to comply with all applicable laws and regulations.

SHAPING BETTER BUSINESS PRACTICES

1. **Fighting Bribery, Corruption, and Influence Peddling**

Bureau Veritas has a **zero-tolerance policy toward bribery and corrupt conduct in any form**. Bribes, kickbacks, influence peddling and any other improper inducements or arrangements involving public officials, customers, suppliers or any other counterparties are strictly prohibited. This prohibition includes political contributions and "facilitation" payments (*i.e.*, small payments made to ensure that a government official performs official duties).

Bureau Veritas requires that all its Business Partners comply with both relevant local and international anti-bribery and anti-corruption laws in all jurisdictions where Business Partners are established or conduct business and operations whether directly, through or with the support of third parties.

In the course of their work for or with Bureau Veritas, Business Partners shall be committed to **actively fight bribery, corruption and influence peddling**. They shall ensure that their directors, officers, employees and business partners do not give or accept bribes in any form or enter into any other improper arrangements.

Specifically, Business Partners shall NOT:

- offer, promise, or authorise the giving of any money, advantage, or other thing of value to any third party in order to secure an improper advantage for Bureau Veritas or the Business Partner;
- solicit, accept, or agree to accept any money, advantage, or other thing of value from a Bureau Veritas employee, director, officer, or any third party in exchange for an improper payment to Bureau Veritas or any of its employees, directors, officers, or third parties;
- offer or accept anything of value with an intention of improperly influencing a business or government decision, or where the person may not be permitted by their employer or local law to receive it;
- pay or provide anything of value to a third party where there is reason to suspect that all or part of the payment or thing of value may be provided to a public official or other third party for improper purpose; and
- offer or provide anything of value to a third party for the purpose of inducing such third party to influence a public official to take any action or abstain from taking any action; and
- do anything to induce, assist or permit someone else to violate these rules

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Business Partners can be asked to disclose any personal or professional connections with public officials during our due diligence process. Any such connections that did not exist during the due diligence process, or that have for any other reason not yet been disclosed to Bureau Veritas, must be disclosed to your Bureau Veritas point of contact at the earliest opportunity.

Business Partners must have internal controls designed to **detect, prevent** and **respond** to corruption, conflict of interests, fraud and money laundering.

Business Partners shall keep accurate and up-to-date records of matters related to business with Bureau Veritas and ensure that their books and records accurately reflect the nature, extent, and value of any transactions relating to their relationship with Bureau Veritas. Transactions must be properly recorded.

Any invoices issued to Bureau Veritas by a Business Partner must be accurate, itemised in reasonable detail and adequate supporting documentation shall be provided to justify any fees or disbursements paid on behalf of any Bureau Veritas affiliate or joint venture.

Any potential fraud that may have an impact on Bureau Veritas must be reported immediately.

2. Conflicts of Interest

Business Partners shall take steps to avoid conflicts of interest, whether of a personal, activity or organisational nature, that may jeopardise the ability of any party associated with the Business Partner, or of any Bureau Veritas employee, to act in the best interest of Bureau Veritas and/or its clients. Decisions our Business Partners take regarding Bureau Veritas business transactions shall not be influenced by personal or private interests.

Personal or friendly relationships with a Bureau Veritas employee shall not be used to influence Bureau Veritas employee's business judgment. If a Business Partner employee is related to a Bureau Veritas employee, and this may represent any actual or potential conflict of interest in a transaction or business relationship, then the Business Partner must promptly disclose this fact to their principal Bureau Veritas point of contact.

3. Economic Sanctions and Anti-Money Laundering

Business Partners must comply with all sanctions, export control, and anti-boycott laws, regulations, orders, directives, and decisions of the European Union, the United Kingdom, and the United States or any other relevant jurisdiction, as applicable.

Business Partners must further comply with anti-money laundering laws and regulations in all applicable jurisdictions.

Business Partners must not take any action, or refrain from taking any action, that may cause Bureau Veritas to violate or otherwise become exposed to penalties under those laws and regulations.

4. Personal data Privacy and Security

Business Partners who collect and/or process personal data on behalf of Bureau Veritas must comply with all applicable laws and regulations relating to the collection, processing, use and transfer of personal data, notably covered by the EU Regulations.

Business Partners shall also implement appropriate technical and organisational security measures to safeguard themselves and Bureau Veritas against unlawful processing of personal data and against loss, theft, accidental or fraudulent deletion, alteration or destruction, or damage, or unauthorized disclosure, use or access to personal data.

In the event of a potential or actual data breach, Business Partners shall inform Bureau Veritas' Data Protection Officer as soon as possible and, if practicable given the circumstances of the case, within a period not exceeding 72 hours (<https://personaldataprotection.bureauveritas.com>). Business Partners shall further take all reasonable steps, defined jointly with Bureau Veritas, to mitigate its effects

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5. Fair Competition

Bureau Veritas is committed to the principles of lawful and free competition based on the merits of our services. The same is expected from our Business Partners. Business Partners shall comply with applicable anti-trust and competition laws in all countries where they operate.

6. Trading in shares

Our Business Partners shall not trade in Bureau Veritas securities, or encourage others to do so, using confidential information received from Bureau Veritas.

7. Intellectual property and confidential information

Business Partners shall respect and enforce intellectual property rights, including Bureau Veritas'.

Business Partners shall implement appropriate measures to prevent disclosure or unauthorized use of Bureau Veritas' confidential information made available to them. Business Partners shall not disclose Bureau Veritas' confidential information without permission.

Bureau Veritas requires from its Business Partners a factual and timely communication to secure a strong and trustworthy relationship. Business Partners shall not issue press releases about Bureau Veritas, our services or the business relationship they have with Bureau Veritas without our prior approval.

SHAPING A BETTER ENVIRONMENT

8. Environment protection

Our Business Partners shall comply with all relevant applicable environmental laws and regulations everywhere they operate. Furthermore and beyond, we expect them to take proactive steps to ensure the protection of the natural environment in everything they do.

Business Partners shall be committed to preserve the biodiversity and more extensively to reduce their environmental impact and to act against the climate change.

SHAPING A BETTER WORKPLACE

9. Human Rights

Our Business Partners recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights.

Our Business Partners shall take responsibility for avoiding infringement of human rights and for remediating the impact, if any, on human rights resulting from activities performed for us and from services provided to us.

Our Business Partners shall be committed to maintaining and improving systems and processes to identify, prevent and mitigate any human rights abuse of their operations, including, where relevant, the following:

- **Child labor**

Business Partners must prohibit the employment and exploitation of children under the age of 16 within their operations and not engage in or support the use of child labour (defined by the International Labour Organization to include work that is mentally, physically, socially or morally harmful to children, or work that deprives children of their childhood, potential or dignity, for example by interfering with their schooling). Workers under the age of 18 are not asked to work on dangerous jobs that may affect their health and safety.

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- **Forced labor, human trafficking and freedom of movement**

Business Partners must prohibit and must not benefit from any forms of forced or compulsory labour, including, without limitation, confiscating worker identity documents or holding workers in debt bondage or using military, prison or slave labour. All work must be conducted on a voluntary basis. Business Partners shall operate in compliance with all applicable laws relating to working hours, wages including those related to minimum wages, overtime and benefits. Their employees shall be free to withdraw from any employment relationship, subject to previous notice with reasonable length.

- **Freedom of associations and right to collective bargaining**

Business Partners shall support the right of all workers to choose whether to form or join lawful trade unions and other organizations of their choice, and to bargain collectively in support of their mutual interests, in accordance with local laws. They shall apply a non-discriminatory policy in respect to union membership and activity in areas such as employment, promotion transfer or dismissal. In countries in which a national legal system prohibits or severely restricts the right of freedom of association, Business Partners support, within the framework of applicable laws and regulations, the establishment of alternative means to facilitate the effective representation of workers interests and communication between workers and management.

Business Partners encourage open and honest communication in their workplaces where employees can speak with their managers about their ideas, concerns or issues and to work together to deal with work condition issues.

- **Discriminations and harassment**

Business Partners must prohibit all forms of discrimination and harassment against employees based on, but not limited to, personal characteristics such as race, color, religion, gender, age, political opinion, national origin, social origin, pregnancy and maternity, disability, medical condition, marital status and sexual orientation.

- **Working hours and compensation**

Business Partners shall operate in full compliance with all applicable laws relating to working hours, wages including those related to minimum wages, overtime and benefits.

Business Partners decisions on recruitment, placement, training, compensation and advancement are exclusively based on qualifications, performance, skills and expertise, all without regard to race, color, religion, sex, national or social origin, age, sexual orientation, marital status, medical condition, disability, political opinion, gender reassignment or any other status protected by applicable local laws.

- **Support to diversity and inclusions**

Business Partners shall support and promote diversity and inclusion in all of its workplaces.

- **Protection of privacy**

Business Partners shall be committed to the right of privacy and freedom of expression and shall take all reasonable measures to endeavor to protect employees against unauthorized access, use, destruction, modifications or disclosure of their personal information and data. Business Partners shall process employee personal data in accordance with applicable local laws and regulations. Security safeguards for employee data are provided as needed and are maintained with respect for employee privacy and dignity.

- **Security**

Business Partners should have in place measures to ensure workers, premises and equipment are secure. Any security measures in place must not harm the safety or security of local community members or other third parties, or undermine respect for the human rights of workers and third parties.

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- **Land rights**

Business Partners must follow all applicable national laws relating to the rights of land and national resources and take steps to ensure that any land acquisitions or changes of use respect the rights of impacted individuals and communities.

10. Health and Safety at work

Business Partners shall be committed to providing a safe and healthy workplace, free from violence, harassment, intimidation and other unsafe or disruptive conditions, to minimize the risk of accidents and injury and to reduce exposure to health and safety risks, for all its employees. Their Health and Safety program shall comply with applicable laws and regulations. It includes provision of appropriate personal protective equipment to workers, establishing safety procedures and training programs on workplace hazards and ensuring policies and procedures are in place to deal with any emergency situations.

All works performed on behalf of Bureau Veritas must strictly be done complying with Bureau Veritas safety policies and processes. Subcontractors must report to Bureau Veritas without delay any accident that occurs during a mission performed on behalf of Bureau Veritas. Detailed instructions are provided in the Bureau Veritas Safety & Security handbook for subcontractors.

ENFORCEMENT RULES

11. Whistleblowing Policy

Bureau Veritas supports a policy of encouraging its employees and Business Partners to “speak out” (giving their name or remaining anonymous), if they witness anything that happens within our business that they believe violates the BPCC. This is supported by an external ethics line enabling people to report issues online or by telephone in some countries.

Business partners shall have systems in place that enable grievance reporting by employees and external third parties. Business Partners shall ensure that employees know how to use such grievance systems and shall explain the process for handling any issues that are raised. All issues should be dealt with in a timely manner.

Business Partners shall also prohibit and prevent retaliation against employees and other stakeholders who lodge good faith reports on concerns either to Bureau Veritas or through their own grievance systems.

12. Reporting

In the event a Business Partner becomes aware of any breach of this BPCC, or has any concerns of potential breaches, the Business Partner shall promptly notify the principal Bureau Veritas point of contact.

Alternatively Business Partners’ staff or other stakeholders witnessing such a breach can inform Bureau Veritas’ compliance team using Bureau Veritas’ ethics line:

Ethics line - <https://ethicsline.bureauveritas.com/>

All admissible reports raised are investigated and addressed according to the existing processes set forth in the Bureau Veritas Code of Ethics. Bureau Veritas maintains confidentiality to the extent reasonably practicable and as required under applicable law throughout any such process.

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13. Consequences of BPCC violations

Breach allegations of the BPCC will be assessed by Bureau Veritas and based on the seriousness of the breach, Bureau Veritas may take the following actions:

- Rely on grievance policy used by the Business Partner for mitigation and remediation
- Investigate itself (including through audits) or request that the Business Partner investigate and report on the alleged breach
- Instruct the Business Partner to mitigate, remediate, cure or solve the breach
- Restrict, suspend or terminate its business relationship with the Business Partner

Bureau Veritas will consider factors including whether the breach was transparently disclosed and assess whether appropriate remedial action has been taken within the Business Partner's organization.

Bureau Veritas also may be required by law to report any unlawful activities to government enforcement authorities or may decide to take proactively any similar steps in respect of any serious allegations or imminent threat of occurrence.

14. Bureau Veritas Contacts

Group Compliance Officer: compliance.officer@bureauveritas.com

Chief sustainability officer & Public affairs' EVP

Marc Boissonnet - +33 1 5524 7712 – marc.boissonnet@bureauveritas.com

If any part of this BPCC is unclear, Business Partners should ask their Bureau Veritas contact for explanation.
