

BUREAU VERITAS

BUSINESS PARTNER CODE OF CONDUCT

(BPCC)

VERSION	DATE
VERSION 02	SEPT 15, 2020

PUBLIC

INTERNAL

RESTRICTED

SECRET



**BUREAU
VERITAS**

<i>Business Partner Code of Conduct</i>	Revision:	<i>Sept 15, 2020</i>
<i>Corporate & External Affairs</i>	Date done:	<i>June 2019</i>

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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 its organization, for all its operations and in all countries Bureau Veritas is committed to support Corporate Social Responsibility and to act with priority on Human Rights and Labour Principles, Health and Safety at work, Environment protection and Anti bribery.

The present Business Partner Code of Conduct (BPCC) is a declination of the Bureau Veritas Code of Ethics and Human Rights policy for Bureau Veritas Business Partner as defined hereinafter.

It defines the requirements that all Bureau Veritas' Business Partners shall comply with, in addition to:

- Applicable local, national and international laws and regulations,
- Bureau Veritas Code of Ethics,
- Contractual provisions.

BPCC is based on international standards and regulations.

In case of contradiction or inconsistency between the provisions of this BPCC on the one hand and the Code of Ethics or applicable laws on the other hand, the latter will prevail.

Specific laws and contractual provisions with a higher standard supersede these general requirements.

Scope of Application

BPCC applies to all Business Partners of affiliates of the Bureau Veritas Group, being companies or individuals such as Joint-Venture Partners, sub-contractors, service providers, suppliers and commercial agents (each, a "Business Partner"), regardless of where they operate.

Our Business Partners are expected to comply with all laws and regulations applicable to the business they conduct for Bureau Veritas. They are expected to apply the principles laid down in this BPCC or apply equivalent principles.

If any part of this BPCC is unclear, they should ask their Bureau Veritas contact for explanation. Non-compliance with this BPCC may lead to measures, including termination of the business relationship.

Implementation

Bureau Veritas asks its Business Partners to acknowledge and agree to abide by the BPCC in our contracts with them. BPCC is accessible online at <https://group.bureauveritas.com/>. It is provided to all new Business Partners and then progressively to existing ones.

We try to engage with our Business Partners from an early stage of our relationship with them to ensure that the BPCC is implemented in practice, including through our selection and monitoring processes, the use of questionnaires and, in certain cases, targeted audits.

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

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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.

We expect Business Partners to agree in writing to comply with the present BPCC and any other terms that Bureau Veritas may require or provide evidence that they have equivalent policy in place.

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

INTEGRITY

1. Fighting Bribery, Corruption, and Influence Peddling

This section is without prejudice to the content of the Code of Ethics.

Bureau Veritas is fully committed to fighting all forms of bribery and corruption, including influence peddling, in every country in which it operates and to complying with relevant local and international anti-bribery and anti-corruption laws in all jurisdictions within which Bureau Veritas is established or performs services.

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).

In the course of their work for or with Bureau Veritas, Business Partners shall be committed **to 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.

Certain Business Partners could 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 the Business Partner’s principal Bureau Veritas point of contact at the earliest opportunity.

Business Partners must have internal controls designed **to detect, prevent and respond to fraud and** money laundering. They 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 and subject to review.

Any invoices issued to Bureau Veritas by a Business Partner must be accurate and 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.

Business Partners shall comply with **anti-corruption laws**, including those that prohibit influence peddling, in all jurisdictions in which they operate.

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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

2. Conflicts of Interest

Business Partners should 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 in regards to Bureau Veritas business transactions may not be influenced by personal or private interests.

Personal or friendly relationships with a Bureau Veritas employee may not be used to influence the employee's business judgment. If an 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, Business Partners must promptly disclose this fact to their principal Bureau Veritas point of contact or ensure that the Bureau Veritas employee does it.

3. Economic Sanctions and Anti-Money Laundering

Business Partners must comply with all sanctions, export control, and anti-boycott laws, regulations, orders, directives, designations, licenses, and decisions of the European Union, the United Kingdom, and the United States, as applicable, and 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 Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. All information received in the course of providing services shall be treated as, and shall remain, strictly confidential, subject to authorisation prior to any release.

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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.

Business Partners shall in particular respect Bureau Veritas Global IS-IT Charter, Bureau Veritas Personal Data Protection Policy for Users as well as Bureau Veritas Security Insurance Plan.

They shall also implement action plans to mitigate the risks identified in the Data Protection Impact Assessment conducted by Bureau Veritas.

In the event of a potential or actual data breach, Business Partners shall inform Bureau Veritas contacts as soon as practicable (and in no event later than 72 hours after discovery), and take all reasonable steps, defined jointly with Bureau Veritas, to mitigate its effects

5. Fair Competition

Bureau Veritas is committed to the principles of lawful and free competition based on the merits of our services. We abide by all applicable anti-trust and competition laws in all countries in which we operate and we expect our Business Partners to have a similar level of commitment to fair competition and compliance with applicable anti-trust laws.

6. Trading in shares

Our Business Partners may 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

We expect our partners to respect intellectual property rights, including those of Bureau Veritas. There must be appropriate measures to prevent disclosure or unauthorized use of Bureau Veritas confidential information made available to them.

Factual and timely communication to us is essential to a strong relationship. Our Business Partners will not disclose our confidential information without permission.

They consider business communications carefully and ensure that they meet high standards. They will not issue press releases about us, our services or our business relationship without our approval.

SUSTAINABILITY

8. Environment protection

Business Partners shall observe all applicable laws and regulations concerning the environment and take steps to ensure the protection of the natural environment.

They shall 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. They should be engaged to preserve the biodiversity and more extensively to reduce their environmental impact and to act against the climate change.

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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.

They 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. Business Partner 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.

- **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 extraction, 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.

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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.

- **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.

SAFETY

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. Detailed instructions are provided in the Bureau Veritas Safety & Security handbook for subcontractors.

Subcontractors must report to Bureau Veritas without delay any accident that occurs during a mission performed on behalf of Bureau Veritas.

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11. Whistleblowing Policy

Bureau Veritas supports a policy of encouraging its people and Business Partners to “speak out”, giving their name or not as they choose, if they witness anything that happens within our business that they believe goes against the present BPCC.

This is supported by an external Alert line enabling people to report issues online, via e-mail or by telephone. Business partners shall have systems in place enable grievance reporting by workers and external individuals.

The objective of any grievance mechanism should be seek to understand allegations, mitigate any negative consequences, and provide some form of remediation, where appropriate.

Business Partners should ensure that workers know how to use the grievance mechanism and explain the process for handling any issues that are raised. Issues should be dealt with in a timely manner.

Business Partners should also prohibit retaliation against workers and other stakeholders who lodge good faith grievances or concerns

12. Reporting

In the event a Business Partner becomes aware of any breach of this BPCC by itself or a third party, or in case of he has any concerns of potential breaches of the BPCC, he should promptly notify its principal Bureau Veritas point of contact or inform Bureau Veritas ‘Legal and compliance’ or ‘Corporate and External Affairs’ contact. All reports raised by Business Partner or Customers or communities are investigated and addressed according to the existing processes set forth in the Bureau Veritas Code of Ethics, maintaining confidentiality to the extent reasonably practicable and as required under applicable law throughout any such process.

13. Consequences for Violations

Breaches to the BPCC will be assessed by Bureau Veritas and according to the seriousness of the breach, Bureau Veritas may:

- Take into account similar policies used by the Business Partner
- Give a delay to solve the breach
- Restrict, suspend or terminate its business relationship with the Business Partner

To do so, Bureau Veritas will consider factors including whether the breach was transparently disclosed and whether appropriate remedial action has been taken within the Business Partner’s organisation. Bureau Veritas also may report any unlawful activities to government enforcement authorities.

14. Referenced documents

The following Bureau Veritas documents are supporting the present BPCC:

- Bureau Veritas Code of Ethics
- Bureau Veritas Human Rights and Labour policy
- Bureau Veritas Inclusion policy
- Bureau Veritas Safety and Security handbook
- Bureau Veritas Global IS-IT charter
- Bureau Veritas Personal Data Protection policy for users
- Bureau Veritas Security Insurance Plan

Title:	<i>BV HSSE Requirements Handbook for Subcontractors and Non-Exclusives</i>	Revision:	2019.7
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They can be obtained from the Business Partner principal Bureau Veritas point of contact.

15. Bureau Veritas Contacts

Bureau Veritas 'Legal and compliance' EVP
Beatrice Place-Faget - +33 1 5524 7608 – Beatrice.place-faget@bureauveritas.com
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