



# Bureau Veritas

## Corporate citizenship & philanthropy Policy

GROUP CSR-001-PO V2  
September 2020



Title:	Group CSR 001-PO Corporate Philanthropy	Version :	2
Code number:	Group CSR 001-PO	Version date :	September 2020

The present policy purpose is to define Bureau Veritas Corporate citizenship & philanthropy vision and ambition. It is aligned with our four Corporate values:

- TRUSTED – “We are here to create trust”
- RESPONSIBLE – “We leave our mark responsibly”
- AMBITIOUS AND HUMBLE – “We demonstrate ambition with Humility”
- OPEN & INCLUSIVE – “We believe in the strength of diversity”

The present policy applies to all Bureau Veritas operational entities and subsidiaries. It gives guidance for local policies.

## 1 - Definition

Charitable giving is the act of giving money, goods or time to projects of general interest requiring support, either directly or by means of a charitable trust or other worthy cause.

Charitable actions are based on corporate and employee engagement to support communities.

## 2 - United Nations Sustainable Development Goals (UNSDG)

At the global level, the UNSDG serves as a high-level forum for joint policy formation and decision-making. It guides, supports, tracks and oversees the coordination of development operations in 165 countries and territories (<https://undg.org/>).



The results of the UNSDG are organized according to the **UNSDG strategic priorities** and **strategic approaches**, capturing what we do and how we do it.

Title:	Group CSR 001-PO Corporate Philanthropy	Version :	2
Code number:	Group CSR 001-PO	Version date :	September 2020

### 3 - Bureau Veritas CSR program is aligned to the UNSDG

Bureau Veritas has chosen to act in accordance with the United Nations Sustainable Development Goals (UNSDG). Its 2023 CSR strategy focuses on 5 SDGs, among the 17 existing ones, which are the most meaningful considering the Group vision, mission and values. These 5 SDGs are:

- SDG #3: Good health and well-being
- SDG #5: Gender equality
- SDG #8: Decent work and economic growth
- SDG #13: Climate action
- SDG #16: Peace, justice and strong institutions

The present Corporate citizenship and philanthropy policy is naturally aligned with the Group strategy and it consequently focuses on these 5 SDGs.

The Group recommends all its entities to focus its charitable and community actions on 3 major topics:

- **HEALTH**, corresponding to SDG #3: Good health and well being
- **INCLUSION**, corresponding to SDG #5: Gender equality
- **ENVIRONMENT**, corresponding to SDG #13: Climate actions

**80% of Operating Group charity spending shall be dedicated to these 3 major topics** and the 20% remaining spending can be allocated to any other sustainable topics that are locally relevant.

### 4 - Types of charity actions

Group charity can be done through 2 approaches: Donations and Volunteering.

#### 4.1 - Donations

A donation is a gift for charity, humanitarian aid, or to benefit a cause. A donation may take various forms, including:

- cash donation,
- in-kind service or product giving.

Donations are given without return consideration. They can only be done to charitable associations, such as NGOs (Non-Governmental Organizations) and NPOs (Non-Profit Organizations).

#### 4.2 - Volunteering

Volunteering is a voluntary act of an employee or group of employees freely giving time and labour for community service. To be considered as a company initiative, volunteering shall be done during working time, without any salary deduction.

Volunteering can be organized in 2 ways in Bureau Veritas:

- Option 1: entities define skills-based volunteering program, leveraging specialized skills, and propose their employees to participate to these programs, and/or
- Option 2: entities select volunteering actions proposed by their employees

Bureau Veritas encourages its Operating Groups to organize and offer volunteering that is undertaken by its employees; the group recognizes that such activities reinforce our employer brand, help meet the expectations of many stakeholders of the company and contribute to demonstrating its commitment to Corporate Social Responsibility. Each Operating Group decides the most appropriate volunteering programs that may or may not leverage the specialized skills of our people:

Title:	Group CSR 001-PO Corporate Philanthropy	Version :	2
Code number:	Group CSR 001-PO	Version date :	September 2020

#### Examples of volunteering actions:

- Participating to Non-Profit Organizations (NPO) actions such as tree planting, food collection, support to disable persons, waste collection, education ...
- Helping NPOs or small companies to raise their QHSE awareness
- Providing first level QHSE training or technical assistance to small companies
- Mentoring to NPOs

## 5 – Approbation process

It is recommended to each entity (Operating Groups, Regions or Countries) to review and approve all proposed sustainable projects to ensure that they are aligned with this policy, the other Group policies, the Code of Ethics and the entity objectives.

Prior approval of the Group Compliance Officer is mandatory for all Charitable donations and sponsorships. The request for authorisation shall be sent through the Webrisk IT Tool to the Group Compliance Officer (see chapter 9).

## 6 - Group reporting

Charitable actions must be recorded and reported by each Operating Group in 4 categories:

- Donations: Cash contribution
- Donations: In-kind service or product giving
- Volunteering: Employee Time during working hours
- Management overhead of charitable actions

For each charitable action, the following information must be recorded:

- The Category (see above list)
- The SDG the action is attached to
- The organization that received the charity
- The explicit description of the action
- The date of the action
- The value of the action (cash given, or cost of in-kind service and product given)
- Number of working hours for volunteering
- Webrisk request reference

## 7 - Tax deduction

In some countries, contributions made to certain relief funds and charitable institutions can be claimed as tax deduction. All donations, however, are not eligible for deductions. Only donations made to prescribed funds qualify as a deduction.

It is recommended to claim tax deduction whenever it is possible according to local tax laws. Tax deduction rules and application process must be investigated in each country where the donation is supposed to take place.

## 8 - Communication

All charity actions shall be branded “**Be part of it**” using the present logo.



## 9 - Code of Ethics applicable policy and procedure

Charitable donations and sponsorships present corruption risk insofar as they can be used to channel improper payments to public officials or other third parties. Even where they are not used to mask bribery, corruption, or influence peddling, such payments risk giving rise to conflicts of interest or an appearance of impropriety. Bureau Veritas has thus developed a procedure to control and monitor charitable donations and sponsorships.

"Charitable donations" are payments made for the benefit of society for charitable, education, social welfare and similar causes. "Sponsorships" are transactions in which the enterprise makes a payment or provides a benefit in kind, to associate its name with an activity or organization and receives, in consideration for the



Title:	Group CSR 001-PO Corporate Philanthropy	Version :	2
Code number:	Group CSR 001-PO	Version date :	September 2020

sponsorship fee, benefits such as advertising credits in media, events and publications, use of facilities, and opportunities to promote its name, products and services. It is a business transaction and part of promotion and advertising. Any other type of donation or sponsorship are prohibited.

Charitable donations and sponsorships must never be offered or provided in circumstances in which an impartial observer could reasonably conclude that the Charitable donation or sponsorship was aimed at creating a duty of gratitude, influencing the recipient to misuse his or her position, or to gain any advantage in an improper way.

Care must be taken to identify any relationships between the recipients of charitable donations or sponsorships (including their officers, directors, owners, trustees, and other closely affiliated parties) and any Public Officials or other individuals in a position to influence decisions relevant to Bureau Veritas.

Wherever possible, charitable donations should be made in kind to reduce the risk that funds will be diverted to improper or unintended uses. Items provided in kind must be obtained through the Procurement Department and follow Bureau Veritas' procurement procedures. Where a monetary donation is proposed, the requester must justify in the Request for Approval of Charitable Donations and Sponsorships form (Appendix 2 of Bureau Veritas code of Ethics Manual) the reason for providing a monetary donation.

The payment of any charitable donation or sponsorship is subject to the fulfilment of the five following tasks which are mandatory and will be audited. This requirement does not apply to volunteering actions provided to non-profit organizations.

#### [1. Step 1: Due diligence](#)

A due diligence process including diligence on the recipient entity, a risk and remuneration analysis, and the other items in the due diligence checklist, shall be performed before any Charitable donation or sponsorship is offered or paid.

#### [2. Step 2: Prior approval for all Charitable donations and sponsorships](#)

Prior approval of the Group Compliance Officer is mandatory for all Charitable donations and sponsorships. The request for authorisation shall be sent through the Webrisk IT Tool to the Group Compliance Officer. Any approved Charitable donation or sponsorship must be made in a manner consistent with the documentation submitted to Compliance and any risk mitigation recommendations the Group Compliance Officer makes. Such risk mitigation measures include, for example, written agreements, transparency measures, audits to verify that donated funds or items are used for intended purposes, a milestone-based payment schedule, or enhanced payment monitoring, among others.

#### [3. Step 3: Accounting](#)

All charitable donations and sponsorships must be recorded in a specific ledger account in the local entity's accounting records: 62383.

#### [4. Step 4: Filing](#)

Records shall be maintained locally of all Charitable donations and sponsorships and the progress of such donations and sponsorships shall be monitored to ensure that the items or funds provided have been used for their intended purposes.

Documentation concerning the payment of any Charitable donations and sponsorships paid in a country must be recorded in a file in order to be able to justify, at the request of the Group Compliance Officer or of the external or internal auditors, the validity of such payment and the correct implementation of the present procedure. Consequently, each payment must be accompanied by a file containing the name of the recipient(s) and where applicable their relationship to Bureau Veritas or the Bureau Veritas individual acting as the proponent of the donation, and proof of the steps taken to obtain the authorisation of the Committee.

#### [5. Step 5: Written contract](#)

Sponsorship agreements and when possible, Charitable donations shall be in writing. The written agreement shall include at least the consideration offered if funds are offered, the use of these funds in detail and an opportunity to check on their use.



Title:	Group CSR 001-PO Corporate Philanthropy	Version :	2
Code number:	Group CSR 001-PO	Version date :	September 2020

## 10 – Review and Control Process

The Group Statements, Policies and Procedures are reviewed annually or if a significant change occurs. This document is uncontrolled once printed.

Validation and communication are ensured according to the Group documents management process. QHSE Managers remain responsible for integration of this policy into their management system.

Compliance with this policy is ensured through:

- Group, Divisional, Operating Group, Regional, Country internal reviews
- External audits

## 11 - Document Validation and History

**Validation:**

	Proposal	Verification	Approval
<b>Name</b>	Marc Boissonnet		
<b>Function</b>	EVP Corporate & External Affaires	CSR Leaders	Executive committee
<b>Date</b>	29/11/2019	30/12/2019	15/01/2020
<b>Date</b>	15/09/2020	20/09/2020	20/09/2020

**Revision History:**

Version	Date	Comments
1	Jan. 2020	Creation of the document
2	Sept. 2020	Alignment with new 2023 CSR strategy

