



BUREAU VERITAS GROUP ANTI-HARASSMENT POLICY

**Group HR 003-PO – Anti-Harassment
July 2020**

Title:	Group HR 003-PO – Anti-Harassment	Version :	1
Code number:	Group HR 03 -PO	Version date :	July 2020

Group Anti-Harassment Policy

Purpose and Introduction

Bureau Veritas' success is dependent upon providing its people with a workplace that is positive, inclusive and dignified, where individual differences are valued and recognized. This Group Anti-Harassment policy aims to help provide such a workplace and reinforce the Bureau Veritas Values to ensure all our people are respected and treated with dignity.

There is no place for inappropriate behavior at Bureau Veritas and such behavior, including any form of harassment will not be tolerated. The Group's zero tolerance in this regard is reinforced by its Absolutes, Values, Leadership Expectations, Inclusion Policy, Human Rights and Labour Policy, Code of Ethics, and by any contractual terms, policies, rules, conditions, regulations, etc. between employees and Bureau Veritas.

Scope

This policy applies to all employees of the Group holding any position (permanent, fixed/short term assignments, trainees, etc.), as well as (sub) contractors engaged through third party agents. It applies to any behavior in the physical and virtual (cyber) workplace. It also applies regardless of location (including business trips, team/client events, homes of employees) and regardless of time/day (including after-hours/weekend events).

This policy is supplemented by any applicable local policies if the local policies create greater restrictions and is subject to mandatory provisions in applicable local laws, if any.

Definition

Harassment includes any unwanted and/or inappropriate behavior that has the **purpose and/or effect** of violating someone's dignity and/or creating an environment for the individual that is:

- intimidating or humiliating (bullying)
- hostile
- degrading
- offensive
- malicious
- insulting

It is important to note that **harassment includes behavior that creates such an environment, even if there is no intention to do so.** Conversely, harassment can also arise where an offender's behavior shows that the offender has the intention of creating such an environment, even if such an environment does not end up being created.

Harassment may or may not involve an abuse or misuse of power, and while it is often repeated, harassment can occur as a one-off event for seriously inappropriate behaviour that affects another individual.

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Examples include:

- isolation (lack of inclusion, such as “silent treatment”)
- offensive language
- sabotage of work
- threats
- coercion
- cyber-bullying
- jokes/humor/banter that are directly or indirectly at someone’s or a group of people’s expense
- unwanted and/or inappropriate sexual behavior (that is, sexual harassment) such as:
 - proposals except if there is immediate consent and except if there is no explicit or implied workplace favor in return for the consent: what is intended as flirting by a person who takes such action, may be experienced as harassment by the person to whom the flirting is directed
 - sexual connotations and implications, such as pet names
 - requests for favors, implied or direct, in return for favorable workplace treatment, such as a promotion, greater bonus, etc.
 - communications with offensive words and/or images
 - leering, sexual gestures (such as whistling at a colleague)
 - physical contact, such as touching a body part, kicking under a table, etc.

Responsibilities

Every employee at Bureau Veritas is responsible for his or her own behavior. In addition, employees who are managers have additional responsibilities.

All Employees:

All employees are expected to behave according to the BV Values and Absolutes, and comply with the BV Code of Ethics, creating a positive workplace where people can succeed and work effectively.

Depending on the purpose, effect and severity of the inappropriate behavior, this behavior could be raised directly with the offender. This might be most appropriate in situations where there is no intention to offend someone else and gives the offender the opportunity to change and/or stop their behaviour. Otherwise, employees are strongly encouraged to raise any inappropriate behavior they observe or experience with others, such as with their managers, and/or Human Resources.

All Managers:

Managers have the same responsibilities as employees, however managers are also responsible for acting in accordance with the Leadership Expectations of Bureau Veritas. This includes Leading through our BV Absolutes & Values – including our BV Value: “Open & Inclusive”. This therefore means that managers have the added responsibility to implement this Anti-Harassment Policy effectively.

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Managers are specifically responsible for stopping any harassment in situations whether there is or not a complaint, and reporting any harassment immediately to Human Resources. They are also responsible for preventing any retaliation against employees if a complaint is made.

Bureau Veritas considers these manager responsibilities so important that disciplinary action may be taken, including possible termination, in situations where a manager does not carry out these responsibilities.

Offenders:

The investigation of any claim of harassment that finds that harassment did take place will be regarded as a disciplinary offence committed by the offender and disciplinary action will be taken. This specific action will depend on a number of factors, including the severity of the offence, whether the offence has been repeated, and the local applicable laws. Termination of employment of the offender is possible. In addition, offenders and managers may also carry personal criminal and/or civil liabilities depending on local laws.

Formal Complaints

Any employee can file a formal complaint by contacting his or her local Human Resources department, and/or (when that person exists) a locally-designated person who is the formal contact person for filing harassment complaints. Alternatively, any employee can contact Bureau Veritas' external and confidential Alert Line by:

- completing an online form at:
 - www.expolink.co.uk/bureauveritas-bureauveritas@expolink.co.uk
- calling Expolink on:
 - one of these toll-free numbers found at:
<https://www.expolink.co.uk/whistleblowing-hotline/PDF/International-Freephone-listing.pdf>.
 - +44 1249 661 808 from any country in the world.

An investigation of the alleged harassment will then follow according to any applicable local legislation and the employee will be kept informed of the investigation and next steps. Anyone who files a complaint will be protected against retaliation to prevent any form of victimisation. If an employee wishes, a formal complaint can be filed with the assistance of an employee representative.

Bureau Veritas will deal with any allegations quickly and seriously and hold an investigation if appropriate (investigations are appropriate in most situations); such investigations will also comply with the due process principles. Confidentiality will be maintained as much as possible, including only talking with different witnesses as required to complete a thorough investigation.

It is presumed that all complaints are made in good faith. However, if it is determined that a complaint is made with malicious intent, there may be disciplinary action taken against the employee making the complaint. Complaints with malicious intent include those whose aim is to cause harm, such as to defame a colleague, where an investigation shows the complaint is without foundation and/or where the complainant knowingly lied in the investigation.