

Duty of care plan

Group Sustainability
Version n° 6 - March 2023





1. Introduction

Bureau Veritas has put in place a Duty of Care Plan in compliance with French law No. 2017-399 of March 27, 2017 on the duty of care of parent companies and subcontracting companies and the draft revision of the European directive 2019/1937 of 23.02.2022.

This Duty of Care Plan covers all of Bureau Veritas' businesses and all of its subsidiaries, as well as those of its subcontractors and suppliers with which it has long-standing business relationships.

- It includes measures to identify and prevent risks of serious infringements in the following five areas: Ethics and the fight against corruption (hereafter referred to as ethics);
- Human rights and fundamental freedoms (hereafter referred to as human rights);
- Individual health and safety;
- Protecting the environment and biodiversity (hereafter referred to as environment).

The purpose of this Duty of Care Plan is to mitigate adverse human rights, climate and environmental impacts in our value chains and to shape our business decisions with respect to residual impacts.

2. Governance

A Duty of Care and Human Rights Committee (DCHR committee) has been formed at Bureau Veritas Group level, comprising the heads of the Purchasing and Sustainable Development departments and the deputy head of the Legal department. It operates under the responsibility of the CSR department.

Its responsibilities are to:

- Design and uphold the Duty of Care Plan, ensuring it complies with French Duty of Care legislation of March 2017 and with the Sapin II law of December 2016 on transparency, actions against corruption and modernization of the economy;
- Determine the risk analysis methodology for the chain of business partners according to activity and location, in order to review and validate which of the business partners holding an established business relationship with Bureau Veritas are exposed to high risks and are to be included in the monitoring program;
- Verify, with support from the Internal Audit department, that this Duty of Care Plan is implemented throughout the Bureau Veritas organization;
- Determine actions to enable continuous improvement to the Duty of Care Plan.

The Operating Groups are responsible for implementing the vigilance plan within their respective scopes. In particular, they are responsible for the following:

- Within their Operating Groups, identifying and managing those business partners who are exposed to high risks, then designating the people in charge of the implementation of the program within the business partners' respective organizations.
- Putting in place the necessary means to implement the (§ 6), risk assessment (§ 7), risk mitigation (§ 8), alerts management (§ 9), indicators (§ 10) and monitoring (§ 11) of the vigilance plan.

The monitoring plan (particularly the risk assessment) is established through consultation with external stakeholders, via the external CSR committee, and employees via the team of CSR experts.

3. Policies

Applicable undertakings and policies under the Duty of Care Plan are:

- Environmental commitment;
- Health, safety, security and well-being commitment;
- Responsible Purchasing Policy;
- Saving Policy with purchasing categories;
- Human rights Policy



- Code of Ethics
- Business Partner Code of Conduct (BPCC);
- General purchasing terms and conditions, and standard contract templates.

The BPCC covers Bureau Veritas' requirements of its business partners on ethical conduct, human rights, safety and security, environment, and data protection.

It is an application of the Bureau Veritas Group's commitments (such as its Code of Ethics and its environmental commitment), and of its human rights policy. It defines the requirements with which all Bureau Veritas business partners are required to comply, in addition to applicable local, national and international laws and regulations, and contractual provisions.

4. Methodology

The following functions are responsible for risk mapping:

Theme	Person in charge
Humans rights	Chief Sustainability Officer
Health & Safety	Group HSE Vice-President
Environment	Group HSE Vice-President
Ethics	Group Compliance Officer

It covers Bureau Veritas entities and its subsidiaries, as well as its downstream business partners that have an established relationship with Bureau Veritas.

The provisions for monitoring Bureau Veritas entities are described in the Group procedures that are accessible on the Group's website and presented in the Universal Registration Document (URD).

This Duty of Care Plan presents the procedures for monitoring business partners in order to prevent serious violations of human rights and fundamental freedoms, the health and safety of persons, the environment, as well as ethics (hereafter identified as the "subjects").

Risk levels are assessed by subject, identifying sensitive purchasing categories and taking account of potential aggravating factors relating to the countries where the activities are carried out:

- **Human rights**

The mapping of risks concerning serious violations of human rights and fundamental freedoms was carried out by the Duty of Care and Human Rights Committee, drawing upon on its knowledge of the risks in each purchasing category, and upon any instances of non-compliance with the Human Rights Policy within Bureau Veritas itself.

- **Health & Safety**

The mapping of risks concerning serious health and safety hazards is based on Bureau Veritas' accident statistics over a period covering the three previous years (2019-2021).

- **Environment**

The mapping of risks concerning serious environmental damage is based on an assessment of the environmental impact of Bureau Veritas' activities and those of its business partners, carried out by the Duty of Care and Human Rights Committee and reviewed by the QHSE Director.

- **Ethics**

The mapping of serious ethical risks is based on the degree of corruption existing in the countries associated with the categories of purchases from risk-exposed third parties. Bureau Veritas uses the CPI index ⁽¹⁾ and the identification of risk-exposed third parties from its corruption risk mapping.

¹ The Corruption Perception Index is published annually by Transparency International



5. Risk mapping

The risk analysis conducted by the Duty of Care and Human Rights Committee in 2022 concluded that the partner categories listed below represent sufficient potential risks for inclusion in the Duty of Care Plan and require specific monitoring:

Risk mapping 2022 - 2025

		Bureau Veritas	Business partners
Human Rights	Forced labor Children labor		Suppliers
	Freedom of association Discrimination	All activities	Office services suppliers
	Private life protection Diversity & inclusion		
Health & Safety	Health	All activities	Subcontractors
	Safety at work	All activities	Subcontractors
Environment	Pollution	Laboratory activities	Laboratory subcontractors & Laboratory suppliers
	Carbon emission	All activities	Subcontractors
Ethics	Corruption		Intermediaries & Subcontractors

Risk levels	Low risk	Moderate risk	Medium risk	High risk
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6. Duty of Care Plan

The following are included in the Bureau Veritas 2022-2025 Duty of Care Plan:

- **Human rights**
 - Suppliers of office services (cleaning, security and maintenance companies).
- **Health & safety**
 - Subcontractors of inspection and certification services with whom Bureau Veritas has an annual expenditure of more than €600,000.
- **Environment**
 - Suppliers of consumables and laboratory equipment with whom Bureau Veritas has an annual expenditure of more than €1 million.
 - Subcontractors of laboratory testing services with whom Bureau Veritas has an annual expenditure of more than €1 million.
- **Ethics**
 - Administrative services subcontractors in countries with a CPI score of 50 or less and with which Bureau Veritas has an annual expenditure of more than €20,000.
 - Intermediaries and consultants in countries with a CPI score of 50 or less and with whom Bureau Veritas has an annual expenditure of more than €200.



The lists of partners integrated in the Duty of Care Plan are established:

- . By the Group Purchasing department for strategic suppliers⁽²⁾ holding a group contract;
- . By the Operating Group for local partners.

	Permanent follow-up	Reinforced follow-up
Joint Venture partners	Acceptance of the BPCC by each Joint Venture partner Verification, during operations, of compliance with Bureau Veritas Health, Safety and Environment policies	
Subcontractors	Acceptance of the BPCC by each subcontractor Verification, during operations, of compliance with Bureau Veritas Health, Safety and Environment policies	Laboratory tests: Purchases > €1M Inspections - Certification: Purchases > €600K Non-production: Purchases > €20K and CPI countries < 50
Suppliers	Acceptance of the BPCC by each supplier Verification of compliance with Bureau Veritas' Human Rights policy by office service providers (maintenance, security, cleaning) on our sites	Consumables and laboratory equipment: Purchases > €1M
Intermediaries	Acceptance of the BPCC by each intermediary Regular monitoring of activity reports and performance of anti-corruption accounting controls.	Intermediaries and consultants: Purchases > €200K and country CPI < 50

7. Risk assessment

The Duty of Care Plan includes permanent and reinforced monitoring as outlined in the previous chapter.

An in-depth risk assessment using Bureau Veritas' Clarity® application⁽³⁾ will be conducted with all partners under extended monitoring. This is performed using a self-assessment questionnaire (SAQ), completed by the business partner in question. The SAQ includes four sections covering human rights, health & safety, environment and ethics⁽⁴⁾.

Partner assessments are performed to three-year cycles, with one-third of the partners being assessed each year.

² Bureau Veritas' so-called strategic suppliers are defined in the Flex ERP

³ <https://group.bureauveritas.com/markets-services/clarity-by-bureau-veritas>

⁴ N.B. Bureau Veritas' so-called strategic suppliers, as defined in the "Group Purchasing" procedure, are also subject to a self-assessment of various risks, including on the same themes as those covered by the Duty of Care Plan.



Onboarding and distribution of the questionnaire are carried out using Clarity® as follows:

- . by the Group Purchasing department for strategic suppliers holding a group contract;
- . by the Operating Group for local partners.

The assessments appearing on the Clarity® platform are based on business partners' responses, supporting documentation and reviews by specialized teams.

A score based on the evaluation of the supporting documents and questionnaire answers results in the classification of partners into 3 categories according to their level of risk:

- . Low risk: score of 80 to 100.
- . Moderate risk: score between 60 and 80
- . High risk: score below 60

8. Risk attenuation

Low risk: Partners classified as “Low risk” are not subject to any specific follow-up action.

Moderate risk: Partners classified as “Moderate risk” are asked to take corrective actions to reduce the risk level, and are required to repeat the self-assessment the following year.

High risk: Partners classified as “High risk” are asked by the relevant Operating Group to take corrective actions to reduce the risk level, and are required to submit evidence of these actions and repeat the self-assessment within six months of the first one.

The Operating Group's Ethics Committee (or any equivalent organization) may decide to carry out additional assessments to gain a better understanding of a partner. In particular, if it deems it necessary before any final decision or in order to decide on the continuation of business relations, an Operating Group may ask its compliance officer to carry out an independent verification.

The entity that sent the questionnaire is responsible for the follow-up of these actions, under the control of the Operating Group that has recourse to the business partner in question.

The DCHR committee monitors the proper implementation of this process.

The Internal Audit Department verifies, for the entity in question, the presence or absence of partner(s) integrated into the vigilance plan, the completion of the Clarity® assessment and, where applicable, the formalization of action plan(s) with said partner(s).

9. Follow-up

The list of partners to be included in the Duty of Care plan is updated every 3 years. Bureau Veritas will, within its means, help its partners to mitigate their risks.

In their contractual practice, the Operating Groups ensure that Bureau Veritas has the discretion to suspend business partners who present strong risks that could call into question its responsibility and reputation.



10. Indicators

The monitored indicators are:

- The number of breaches of the Code of Ethics
- The number of violations of the Human Rights Policy
- The number of employee and subcontractor accidents
- The rate of coverage of the Business Partner Code of Conduct (BPCC)
- The number of acceptances of the Business Partner Code of Conduct (BPCC)
- The share of accepted Business Partner Code of Conduct (BPCC)
- The number of partner self-assessments of the Business Partner Code of Conduct (BPCC)
- The number of business unit self-assessments on human rights and % of employees covered

These are communicated annually.

11. Whistleblowing system

Bureau Veritas has set up an alert system under the responsibility of the Legal and Compliance Department. This system is accessible to all employees and partners. It allows any case of serious risk or complaint to be reported. It is described in the Business Partner Code of Conduct and in the Group's Code of Ethics.

Based on the monitoring program outlined above, the results of corrective actions taken and alerts received, the Operating Groups' Ethics Committees may decide to suspend commercial relations with a supplier.