



Bureau Veritas

Corporate citizenship & philanthropy Policy

GROUP CSR-001-PO V1
January 2020



Title:	Group CSR 001-PO Corporate Philanthropy	Version :	1
Code number:	Group CSR 001-PO	Version date :	January 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.

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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).

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

- **Health**, corresponding to UNSDG:
 - Goal 1: No poverty
 - Goal 2: Zero Hunger
 - Goal 3: Good health and well being
- **Education**, corresponding to UNSDG:
 - Goal 4: Quality education
 - Goal 5: Gender equality
- **Environment**, corresponding to UNSDG:
 - Goal 6: Clean water and sanitation
 - Goal 7: Affordable and clean energy
 - Goal 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.

Group charity can be done through 3 approaches:

- Donations
- Volunteering
- Services

5 - Volunteering

Volunteering is directly linked to CSR, providing support to communities that are one of the company stakeholders.

Volunteering is also renowned for skill development and is often intended to promote goodness or to improve human quality of life. Volunteering may have positive benefits for the volunteer as well as for the person or community served.

It is recommended to all Bureau Veritas entities to organize a volunteering program involving employees during their working time.

Volunteering can be organized in 2 ways in Bureau Veritas:

- Option 1: entities define volunteering programs with selected beneficiaries and offer their employees to participate to these programs, and/or
- Option 2: entities let their employees identify volunteering actions that they want to support and authorise them to participate to them.

Each Operating Group decides the most appropriate skills-based program.

For option 1, Bureau Veritas entities set a skills-based volunteering program, leveraging the specialized skills and the talents of individuals.

For option 2, Bureau Veritas entities encourage its employees to participate to volunteering actions in relation with their expertise and activities. The employee willing to apply shall send his/her requests to his/her manager indicating the beneficiary identity, the work to be done, the place and the duration. If the application is accepted by the management, the employee will be authorised to do this volunteering action during his/her working hours without deduction of salary nor leave day. Application, authorisation and reporting processes will be defined and followed locally.

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Examples of volunteering actions:

- Participating to Non-Profit Organizations (NPO) actions (tree planting, food collection, support to disable persons, waste collection, education ...)
- Helping NPOs raise their QHSE awareness and/or build and sustain their capacity to successfully achieve their missions.
- Mentoring
- Raising awareness of small companies towards Normalization, Health & safety, Environment or Quality through training sessions
- Providing first level training or technical assistance to small companies on:
 - Safety management (defining policies, selecting cardinal safety rules, structuring a safety management system, performing safety assessments ...)
 - Environment protection (structuring an environment management system, training on energy saving, calculating and reducing CO2 emissions...)
 - Quality control (explaining standards, designing a quality management system, auditing quality control activities ...)

4 - Donations

A donation is a gift for charity, humanitarian aid, or to benefit a cause. A donation may take various forms, including money, alms, services, or goods such as clothing, toys, food or vehicles.

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).

6 - Services

Bureau Veritas operational units can also offer services. It can only be done to charitable associations, such as NGOs and NPOs (Non-Profit Organizations).

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.

Usually, tax reduction mechanism applies to cash donations, in-kind donations, as well as services and skill-based sponsorship.

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.



10 - CSR steering committees

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.

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11 - Donations and sponsorships: 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 organisation and receives, in consideration for the 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 organisations.

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.

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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.

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
Name	Marc Boissonnet		
Function	EVP Corporate & External Affaires	CSR Leaders	Executive committee
Date	29/11/2019	30/12/2019	15/01/2020

Revision History:

Version	Date	Comments
1	Jan. 2020	Creation of the document