



euroCompliance



COP-2022

GLOBAL
COMPACT



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COP 2022 GLOBAL COMPACT



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EDITORIAL

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We are very pleased to update our Communication on Progress and describe how we concretely translate our values into practice and commitments on a daily basis to support the 10 principles of the Global Compact - as a follow-up to our membership that began in April 2017. As many companies we faced challenged during the pandemic; we are also experimenting a growth of our activities in the private but also in the public sector for the last 2 years. Indeed, the interest for antibribery and compliance management systems certification is continuously expending. Adopting a sustainable behaviour has always been a compass to accompany our decisions in that context.

We are a "small company" and our impact can be perceived as limited. However, our governance and the agility of our structure allow us to have an immediate capacity to influence. **As such, it seemed essential to us, from the creation of EuroCompliance, to integrate human rights, labour law, environment, and anti-corruption aspects into each of our decisions and actions.** This is linked to our business, which is entirely dedicated to promoting ethics and fighting corruption. It is also the expression of our personal convictions and values, which we are committed to deploying within our company.

In this way we hope that our choices will contribute to a positive imprint on our ecosystem and a more widespread awareness.

Céleste Cornu

CEO

A handwritten signature in blue ink, appearing to read 'C. Cornu', with a long horizontal flourish extending to the right.

Philippe Lesoing

General Manager

A handwritten signature in blue ink, appearing to read 'P. Lesoing', with a complex, scribbled flourish extending to the right.

THE 10 PRINCIPLES

OF THE GLOBAL COMPACT



HUMAN RIGHTS

cf. pages 14 to 16

- 1.** Businesses should support and respect the protection of internationally proclaimed human rights ; and
- 2.** Make sure that they are not complicit in human rights abuses.



ENVIRONMENT

cf. pages 7 to 9

- 7.** Businesses should support a precautionary approach to environmental challenges ;
- 8.** Undertake initiatives to promote greater environmental responsibility; and
- 9.** Encourage the development and diffusion of environmentally friendly technologies.



LABOUR

cf. pages 17 to 19

- 3.** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining ;
- 4.** The elimination of all forms of forced and compulsory labour ;
- 5.** The effective abolition of child labour; and
- 6.** The elimination of discrimination in respect of employment and occupation.



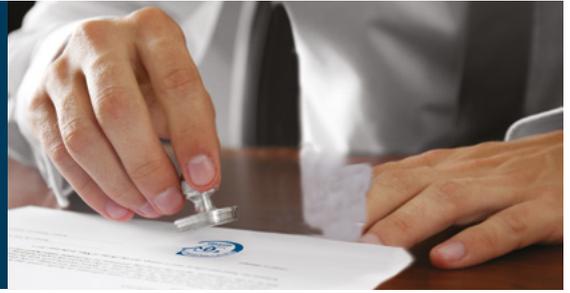
ANTICORRUPTION

cf. pages 10 to 13

- 10.** Businesses should work against corruption in all its forms, including extortion and bribery.

PRESENTATION

EUROCOMPLIANCE




euroCompliance

AFFIRMING SHARED VALUES



AUDIT

EuroCompliance is a body carrying out **compliance audits and in particular certification audits according to the ISO 37001 and ISO 37301 standards.**

The certification enables our customers to :

- encourage a **continuous improvement process** ;
- **assess the quality of their systems** - in compliance with applicable laws and regulations (such as FCPA, UKBA, Sapin 2 etc.) - ;
- **mitigate the risk** in their organization ;
- **communicate** to their stakeholders on their commitments and maturity.



TRAINING

EuroCompliance is also **a training organisation, Qualiopi certified**, which offers face-to-face and on-line sessions :

- **intra-company**, adapted to the specificities and expectations of its customers related to ethics and the fight against corruption ;
- **inter-companies** on anti-bribery and compliance management systems or other specific themes (handling of internal alerts, mapping of corruption risks, etc.).



EXPERTISE

Having an activity dedicated to the fight against corruption, **we benefit from specialisation and expertise** in the field.

We offer services such as :

- **Tailor-made**, adapted to the risks and processes of each client;
- **Pragmatic**, considering the constraints of operational staff.



QUALITY

We are committed to operational excellence with the adoption of a demanding management system. As such, we are **the first French organization, one of the first in the world, to have obtained accreditation for our ISO 37001 certification activity.**

Our service offer is inseparable from **the team's personal values, our Code of Conduct (Appendix 1) and our commitment** to adopt procedures to guarantee the impartiality of its decisions and the responsibility of its teams.



accreditation no. 4-0599 ,
available on www.cofrac.fr



ENVIRONMENTAL PRINCIPLES

As a service company, our environmental impact is moderate. However, we have identified **three areas for improvement** : our **travels, purchasing** and **printing**.

COMMITMENT 1

Offset the carbon footprint of our travels

| Statement

Our main environmental impact is related to **our trips to our customers** (training and audit activities).

| Actions

In addition to a travel policy that favours public transport over individual transport, and rail over air, **we have committed to carbon offsetting our travels.**

To that purpose we adopted two specific actions :

- We agreed a partnership with eco tree to support the plantations in eco-forests ;
- Following the lessons learnt from the pandemic, we decided conduct our activity in a hybrid way, mixing on-site presence and on-line services (for auditing as well as training).

We managed to reduce our carbon footprint of 30% compared to 2019.

| Outcomes

After supporting Reforestation association for several years, we have moved to a partnership with Ecotree. The choice was driven by our willingness to have a better view on how the forests we invest in are managed in a long-term perspective. EuroCompliance has planted 120 trees per year since 2020.

We also offer a tree to the major of our inter-company training sessions !



COMMITMENT 2

Favouring the dematerialization of training materials

| Statement

The majority of our printing is for our training materials, and the impact is significant (more than 500 people trained per year)

| Actions

We have invited our customers to **replace the delivery of paper materials with electronic delivery.**

To mobilize them, **we offered a discount on the price of our training courses for those who would opt to stop printing**, so that the approach would result in a reduction in costs for them.

We have been offering **paperless training materials option in** our sales proposals since 2019.

We propose as much as we can dematerialized documents for exercises as well as for sharing courses contents.

| Outcomes

90%

of customers have responded positively to our proposal have switched to electronic media.

COMMITMENT 3

Limiting our environmental impact through our purchases

| Statement

Our purchases mainly consist of **supplies** (stationery, training materials); **marketing materials** (brochures, business cards, pens) and **services**.

| Actions

In order to limit our environmental impact, it has been decided for each purchase, however modest, **to favour local suppliers and to take into account the environmental impact of the product** (based on existing life cycle analyses, supplier labels, etc.).

The choice of local suppliers, in addition to the environmental benefit, aims to have **an economic and social impact within our ecosystem**, by involving local actors.

Even if we loved sending paper cards, it has been decided since Xmas 2020 to **stop printed greetings cards**. The devoted budget is now donated to La Fondation de France. This reduces our environmental impact and allows us to have a positive action towards young people in difficulty.

Finally, we try to **adopt the right reflexes**, daily, in our premises, with a particular emphasis on consumables and recycling. These are

'small gestures' but we try to systematize them by making the choice that limits our impact whenever we can.

| Outcomes

100%

of our printing is carried out by a local printer with PEFC and Imprim'Vert (green) labels (brochures, business cards, notepads, etc.).

EuroCompliance pens are made locally.

Printers - photocopiers have been selected in black and white only (no colour printing possible).

Selection of FSC-certified paper (external use) or recycled paper (internal use).

100%

of waste paper recycled

Tea and coffee are organic and fair trade !

ENGAGEMENT

EUROCOMPLIANCE & ANTICORRUPTION



PRINCIPLES FOR THE FIGHT AGAINST CORRUPTION

Our core business is focused on the fight against corruption. In this respect we feel it is important to set an example in this area.

COMMITMENT 1

Ensuring that our auditors adhere to our ethical principles

| Statement

We must ensure the **impartiality and ethics of our employees and expert partners**. It is a question of principle but also of sustainability: if our clients were to doubt the independence of our assessments, they would simply turn away from EuroCompliance.

| Actions

We have adopted a **Code of Conduct**, incorporated into the company's articles of association, which applies to all persons associated with EuroCompliance's operations.

This commitment is reinforced by the annual signing of a **declaration of compliance** with the requirements of the Code of Conduct.

| Outcomes

The EuroCompliance Code of Conduct is signed by

100%

of staff, 100% of subcontractors and all members of the Certification Committee.

The annual declaration of compliance is signed by

100%

of the employees and subcontractors who have carried out operations with EuroCompliance.

COMMITMENT 2

Ensuring the impartiality of our certification process

| Statement

The greatest risk to our impartiality is **a conflict of interest** that would unduly influence (or appear to influence) one of our evaluations.

| Actions

To try to prevent this risk we have implemented **specific measures**, which complement the Code of Conduct:

- Before the start of each engagement, **stakeholders are required to declare their potential interests with the party to be audited in a systematic and documented manner;**
- **The ISO 37001 Committee** assesses once a year the measures taken by EuroCompliance to ensure impartiality - in particular, it receives a presentation of the register of conflicts of interest

Compliance with these commitments is verified **internally** (via an annual audit of the ethics system) and **externally via EuroCompliance's COFRAC accreditation process.**



accreditation no. 4-0599,
available on www.cofrac.fr

| Outcomes

The Committee has yearly met since 2017.

First Accredited body by COFRAC in 2018, EuroCompliance just renewed its accreditation in 2022 for the next 5 years (subject to surveillance visits).



Illustrated with a quote from a member of the Committee "As Legal Director of SGS France, the world's leading inspection, analysis, testing and certification group, I gladly responded to EuroCompliance's request to become a member of their ISO 37001 Committee - a committee made up of various stakeholders (clients, certification bodies and anti-corruption experts). In this capacity, we meet once a year to assess the measures taken by EuroCompliance to prevent situations that could undermine their impartiality. Over the past two years, I have seen a strong commitment by management to prevent any conflict of interest, to adopt procedures aligned with best practices and to work in complete transparency. The mere fact that they submit their methodologies and choices to outside scrutiny is a sign of their determination to constantly improve their ethics policy."

Patrick Schwartz

COMMITMENT 3

Facilitate reporting of discrepancies

| Statement

Given the size of our company, we considered that if a problem were to arise, it would be more easily identified by a customer or other external party than internally.

Hence the choice of **a fairly broad communication of our system for reporting** unethical behaviour.

| Actions

We have adopted **a reporting system that is open to all our stakeholders** - although not covered by the regulatory obligations relating to alert systems.

| Outcomes

The reporting procedures (...) are easily available on our website and in all the commercial proposals issued by EuroCompliance.

To date we have not yet recorded any reports.



"Our clients are mainly large public or private organisations that need to comply with applicable anti-bribery laws and implement our Reporting.Net platform. We were pleasantly surprised to see that Eurocompliance's Managers voluntarily and proactively apply good ethical practice rules to themselves, even though they are not legally obliged to do so. The fact that the platform is also open to external reporting and that, for reasons of integrity, the reporting issuers have been given the possibility to choose to which Reporting Officer to report is a genuine "Leadership by Example".

Olivier Trupiano
Founding President, Compliance Officer, DPO
Signalement.Net



COMMITMENT 4

Showing our determination to prevent corruption

| Statement

In the fight against corruption, **public engagement** makes sense. It makes it possible to share our policy but also to talk about a subject that is sometimes taboo.

| Actions

EuroCompliance wished to support a reference organisation: Transparency International, the main civil society association in the fight against corruption. Supporting the work of the association allows us to contribute to a recognised approach and to benefit from collective intelligence. It is in this context that we joined the Forum des Entreprises Engagées (Forum of Committed Companies).

| Outcomes

Our membership translates into :

- A **public statement** to fight corruption on our website
- Regular participation in **working groups** ;
- A **financial contribution**.



As a member of Transparency International France's Forum des Entreprises Engagées (Forum of Committed Businesses), EuroCompliance supports the association's activities and is committed to rejecting and fighting corruption in all its forms. EuroCompliance is committed to making its best efforts to set up a solid prevention system inspired by the best practices in force in the business world.



ENGAGEMENT

EUROCOMPLIANCE & HUMAN RIGHTS



HUMAN RIGHTS PRINCIPLES

As a company on a human scale, located in France, we are little exposed to the risk of human rights violations in our business. Nevertheless, **we consider that we have an influence on our ecosystem to defend these values in which we recognize ourselves.**

COMMITMENT 1

Demonstrating our commitment to human rights

| Statement

Since the creation of EuroCompliance, our Code of Conduct and internal documents have prioritised **issues relating to business ethics** (prevention of conflicts of interest, impartiality, free competition, etc.). The consequence is that other important subjects such as human rights have never been mentioned.

| Actions

Faced with this situation, we decided **to revise our Code of Conduct**, based on a consultation with our main stakeholders (auditors and the Impartiality Committee) to broaden the principles guiding our actions.

| Outcomes

Version 3 of the EuroCompliance Code of Conduct has been approved and widely communicated.

This update includes the concepts of fundamental human rights, international labour standards and new sections on diversity or occupational health and safety. (see appendix).

Our references now include the Universal Declaration of Human Rights and the ILO fundamental conventions.

COMMITMENT 2

Promote effective and protective alerting devices

| Statement

One of the essential aspects of guaranteeing the defence of human rights is **to enable victims to be able to denounce the human rights violations to which they may be subjected.** In this perspective, one of the means is to promote the right to alert.

| Actions

We have decided **to commit ourselves to the promotion of a right of alert that is protective and as accessible as possible.**

| Outcomes

EuroCompliance is taking part in the standardisation work relating to the adoption of an international standard establishing good practices for setting up an alert system - the ISO/TC309 WG 3 group in charge of drawing up the next ISO 37002 Whistleblowing Management System standard.

COMMITMENT 3

Buying products and services from countries that protect human rights

| Statement

As we do not have any power of influence over our suppliers in terms of purchasing volumes, **we have chosen local suppliers, French or European production.**

| Actions

We target **purchases from suppliers where we have reasonable assurance of their good human rights practices.**

| Outcomes

Purchase of services

100% local

Equipment purchases

100% french or european manufacturing
(except for telephony and computer products)

Vehicle purchases

100% european manufacture

ENGAGEMENT

EUROCOMPLIANCE & LABOUR RIGHTS



PRINCIPLES ON LABOUR STANDARDS

EuroCompliance is made up of two managers and a team of 8 expert partners. **Our top priority is regulatory compliance and we are committed to respecting the various provisions of French labour law.** We apply identical contractual provisions for all our expert partners, regardless of their country of establishment and the countries in which they operate. In addition, we try to offer working conditions favourable to the development of everyone, collective intelligence and good humour.

COMMITMENT 1

Adopt a diversity policy

| Statement

When EuroCompliance was created **in January 2016, it consisted of a single profile** : senior experts from the private sector, male.

| Actions

Our first objective was **to enrich the diversity of the team.**

Three years later, the team has become more feminine, younger and more diversified with profiles from the public sector or the aid sector.

| Outcomes

Breakdown of male/female executives

50/50

Overall male/female distribution

2019 : 40/60



(partial) Team meeting - March 2019

COMMITMENT 2

Fostering sustainable and fair relationships with our subcontractors and suppliers

| Statement

The behaviour we adopt towards our subcontractors and suppliers has an impact on the relationship within the team and therefore on the quality of the work we deliver. Considering each person's constraints, enhancing skills and respecting payment deadlines are all important elements **in guaranteeing a positive climate and quality working conditions.**

| Actions

To improve our impact on our suppliers and subcontractors, **we adopt an attitude of respect for our partners** and make commitments to them.

| Outcomes

In 2019, EuroCompliance signed the Responsible Supplier Relations Charter.

Charte 
**RELATIONS FOURNISSEURS
RESPONSABLES** *Signataire*

COMMITMENT 3

Encouraging team spirit

| Statement

We wish a **united and happy team** to collaborate on our missions.

| Actions

This means promoting well-being at work and team spirit.

An initiative was born with this in mind : **to engage team members who wish to do so in joint sporting events.**

Modest results, explained by the geographical spread of the team, but encouraging. It remains to find a unifying event that is accessible to as many people as possible.

| Outcomes

Participation in the Parisienne race in 2018 and the Salon-de-Provence half-marathon in 2019.



2020 EXPECTATIONS



THE AXES OF DEVELOPMENT

The year 2023 also promises to be rich in projects to continue to demonstrate our commitment.

We wish **to consolidate the actions** we have undertaken and initiate new projects.

In this respect, we have identified a **number of priorities** :

| Social Impact

In order to improve our social impact, we aim to facilitate employee involvement in **volunteer projects**. At this stage, several options are being considered, including skills volunteering or a day of solidarity.

| Safety at work

Expert teams and partners are required to travel internationally, sometimes even to countries that may present health or safety risks. **A process to facilitate and secure these trips will be studied.**

| Diversity

Proud to have a team with varied and complementary profiles, and already engaged in a transfer of skills, through regular interventions in Master 2 or DU or other institutions, the managers plan to integrate a work-study student in order **to open the company to the reception of young talents.**

| Governance

EuroCompliance already submits itself to the ISO 37001 Committee for all questions relating to impartiality and encourages exchanges with its expert partners. The company's development strategy will be reinforced by a reflection on a stronger inclusion of the latter and an opening to an external view on corporate governance.



APPENDIX

euroCompliance

AFFIRMING SHARED VALUES



 CODE OF CONDUCT



The purpose of EuroCompliance is to contribute to business ethics by promoting the deployment of efficient anticorruption management systems through our ISO 37001 certification training and auditing activities.

It therefore seemed essential to us to adopt a demanding ethical policy from the outset and to commit ourselves to our clients, our expert partners and other interested parties.

The credit of a certification is notably based on the level of trust that stakeholders place in the issuing body. Our priority is therefore to be impartial in all decisions and professional in each mission entrusted to us. We are committed to preventing and managing situations of conflict of interest to which we may be exposed.

This Code of Conduct lays down the principles that guide our actions. It is part of EuroCompliance's statutes and is signed by all partners, associates and subcontractors.

Céleste Cornu
President

Philippe Lesoing
General Director

OUR PRINCIPLES

This Code of Conduct contributes to EuroCompliance's commitment to raising its ethical standards in the area of business relations. Without exhaustively covering all the risks of unethical behaviours that we may be confronted with, it indicates the general principles guiding our choices in conducting our missions and in our relations with interested parties (clients, auditees, expert partners, suppliers, etc.).

CLIENT RELATIONS

EuroCompliance places client satisfaction at the heart of its missions.

Partners, associates and subcontractors are committed to improving EuroCompliance's reputation, building trust and client loyalty. They keep the client's best interests in mind in their commercial advice as well as in their assessments and are faithful in the exercise of their missions.

To build this trust, the auditors explain the audit's progression and quickly report any difficulties encountered. They present a draft version of their reports for accuracy control.

BENEVOLENCE

EuroCompliance treats its partners, subcontractors and clients with respect.

Auditors need clients to be cooperative and transparent to carry out audits under good conditions, especially for the access to key people and internal documents. To encourage this atmosphere of trust, auditors treat their contacts with respect in all situations and do not use intrusive methods, even in case of problem.

The assessment of an anticorruption management system entails an approach based on attentiveness and continual improvement.



COMPLIANCE WITH LAWS AND REGULATIONS

EuroCompliance complies with the laws and regulations applicable in France and the countries where it does business.

In this respect, it is responsible for the company's keeping up-to-date with the laws and regulations that apply to its business before carrying out any projects and for ensuring an understanding thereof by its partners, associates and subcontractors.

EuroCompliance emphasizes the importance of respecting fundamental human rights, international labour standards (freedom of association, non-discrimination, prevention of harassment, etc.) and anticorruption laws.

SOCIAL RESPONSIBILITY

EuroCompliance includes social and ecological concerns in the conduct of its business and in its relations with interested parties.

This commitment translates into a number of priority goals:

- A policy of local sourcing – a policy with an overall positive impact (reducing our carbon footprint, local economic development, social bonds, etc.);
- An approach reducing the carbon footprint of EuroCompliance's activities – through reduction or limitation measures and carbon compensation reduction;
- Responsible, sustainable relations with subcontractors and suppliers based on fair choices, transparent communication and meeting our contractual commitments within reasonable timeframes.

Partners, associates and subcontractors are committed to pursuing the goals set by EuroCompliance. They are requested to propose new actions for sustainably improving the company's impact on its ecosystem.

DIVERSITY

EuroCompliance can count on a team that shares extensive expertise in the prevention of bribery, but is made up of widely varied profiles and backgrounds. This diversity contributes to our relevance and the depth of our analyses.

Partners are constantly at work enriching the diversity of our teams.

Partners, associates and subcontractors encourage this diversity through discussions with many stakeholders from a wide range of activities and geographical locations (professional organizations, ISO, NGOs, think tanks on ethics and compliance, etc.).

They are also committed to preventing all forms of discrimination at EuroCompliance and when conducting their missions.

COMPLIANCE WITH COMPETITION LAW

EuroCompliance is committed to conducting its business within the laws and rules of fair competition.

In particular, no partner, business associate or subcontractor may take part in agreements with competitors or other partners that have the intent or effect of fixing prices, distorting the bidding process, sharing a market, limiting free competition or boycotting a client or supplier.



IMPARTIALITY AND PREVENTION OF CONFLICTS OF INTEREST

EuroCompliance's clients expect to be treated without any form of prejudice. Partners, associates and subcontractors make their decisions in an independent manner, selflessly and without any conflicts of interest.

In particular, EuroCompliance:

- prohibits all forms of self-assessment, where the company would assess its own work pursuant to consulting services – and therefore does not perform any such services.
- prevents all conflicts of interests, situations in which a partner, associate or subcontractor has enough private or personal interest to influence or seem to influence the carrying out of his/her duties. For this, partners, associates or subcontractors:
 - must hold no direct or indirect interests in the business of a supplier, client, competitor or any other party likely to influence their business decisions in the name of EuroCompliance;
 - must ensure, with every new mission, that there is no risk of their personal situation's giving rise to any conflicts of interest;
 - must not undertake any mission or job offered by a client or competitor likely to impinge on their performances or judgement while carrying out their duties for EuroCompliance. Subcontractors must notably inform an officer of EuroCompliance if they are led to conduct missions on a private basis for a EuroCompliance client so that any situation of conflict of interest can be analysed and dealt with.
- strictly restricts giving or receiving gifts and invitations. Their purpose or result must not be to influence a decision that would be beneficial to EuroCompliance. They must be symbolic and exceptional in accordance with EuroCompliance's Gifts and Invitations Procedure.
- does not make donations to political parties or organisations.
- reviews sponsorships and patronage operations in the Executive Committee to assess their social impact and to ensure that they do not seek to unduly influence a business partner's decision. EuroCompliance is notably committed to organisations and projects related to the fight against corruption.

PREVENTION OF BRIBERY AND INFLUENCE PEDDLING

EuroCompliance applies a ‘zero tolerance’ policy in its anti-bribery and corruption commitment, whether active or passive, in its business transactions with partners and clients in France and abroad.

EuroCompliance’s partners, associates and subcontractors must resist all attempts to influence them or their decisions, especially as regards certification recommendations. In this respect, auditors must report all attempts of influence or corruption to EuroCompliance’s President or General Director, so as to decide whether the commercial relationship should be terminated immediately or if it may continue satisfactorily after giving a reminder of the applicable regulations and EuroCompliance’s Code of Conduct.

Partners, associates and subcontractors must not directly or indirectly offer, promise, grant or authorize the remittance of any amount of money or any other valuable (tangible or intangible), with a view of obtaining commercial contracts, amenities or any other unjustified benefit.

Likewise, partners, associates and subcontractors must not monetize the position or influence of any person, real or supposed, to affect a decision to be made by a third party in favour of EuroCompliance (influence peddling).

Facilitation payments are acts of corruption and therefore are also forbidden – except in cases of serious, imminent danger to life or physical integrity.



CONFIDENTIALITY

EuroCompliance is committed to exercising the greatest care when dealing with its clients' confidential information.

In order to conduct their mission under the best possible conditions, EuroCompliance's partners, associates and subcontractors have access to confidential information. They must undertake not to disclose any confidential information, to retain only those documents required for their tasks (audit or training) and to destroy them at the end of the agreed statutory period of client data retention.

EuroCompliance's partners, business associates and subcontractors notably must not release any information about EuroCompliance's clients, partners or clients' internal procedures.

EuroCompliance does not communicate in any way about companies undergoing the certification process or which have discontinued the certification process.

As a rule, EuroCompliance formally requests prior authorisation from its clients before releasing any information concerning them (including mentions of them as reference clients).

PERSONAL DATA

EuroCompliance limits data gathering and strictly regulates personal data processing.

In accordance with EuroCompliance's privacy policy, partners, business associates and subcontractors gather, process and keep personal data for specific purposes, for a limited period of time and which has legitimacy for the processing purposes for which said data are gathered and used. The personal data consulted as part of an audit are anonymized or are recorded in the audit reports submitted to the clients for accuracy control when they are saved.

EuroCompliance ensures a right to access and rectify the personal data that it processes and saves.

FRAUD PREVENTION

EuroCompliance works to prevent acts of fraud that the company, its partners, its clients or its business associates may find themselves confronted with.

A multifaceted subject that is constantly evolving, fraud requires never-ending vigilance. EuroCompliance's partners, business associates and subcontractors must comply with the applicable in-house procedures to avoid a wide range of frauds. They are also attentive to all abnormal situations and, when in doubt, inform the management so that a suitable analysis of the situation can be carried out.

EuroCompliance is committed to maximum transparency toward interested parties who could be impacted by any fraud or attempted fraud that EuroCompliance may be faced with.

WORKPLACE HEALTH AND SAFETY

EuroCompliance is committed to taking all necessary measures to ensure the safety and to protect the health of its partners, associates and subcontractors in the context of their responsibilities and missions.

EuroCompliance's partners, business associates and subcontractors regularly travel around the world, including to countries that may present risks considered to be significant in terms of hygiene, health or safety, so increased vigilance is needed in preparing for missions in the field. The audit managers are responsible for ensuring the audit teams' safety and health, insofar as possible. Each one takes protective measures for themselves and for their colleagues and comply with the applicable safety recommendations, including those of their clients, during on-site missions.

EuroCompliance encourages a good work-life balance for its teams and, insofar as possible, takes into account the constraints facing its partners, business associates and subcontractors when planning missions.



OUR REFERENCES

- **Universal Declaration of Human Rights. 1948**
- **International Labour Organisation Conventions, and notably the so-called fundamental conventions :** Freedom of Association and Protection of the Right to Organise Convention (No. 87), 1948; Right to Organise and Collective Bargaining Convention (No. 98), 1949; Forced Labour Convention (No. 29), 1930 (as well as its protocol of 2014); Abolition of Forced Labour Convention (No. 105), 1957; Minimum Age Convention (No. 138), 1973; Worst Forms of Child Labour Convention (No. 182), 1999; Equal Remuneration Convention (No. 100), 1951. Discrimination (Employment and Occupation Convention (No. 111), 1958.
- **OECD Guidelines for Multinational Enterprises, updated in 2011.**
- **Principles of the United Nations Convention against Corruption – 2003.**
- **Principles of the Global Compact – 2000.**

IMPLEMENTATION PRINCIPLES

SO THAT THESE COMMITMENTS ARE A REALITY :

- Each EuroCompliance partner, business associate or subcontractor expressly undertakes to comply with this Code of Conduct when contracting with EuroCompliance.
- Each EuroCompliance partner, business associate or subcontractor is duly and clearly informed about EuroCompliance's ethics and compliance programme in the course of their integration and training processes.
- The policy governing gifts and invitations gives a precise definition of what partners, business associates and subcontractors can accept or give depending on the circumstances.
- Auditors fill out a declaration of interests before the start of each audit or certification mission.
- Every year, each EuroCompliance partner, business associate and subcontractor confirms their compliance with the ethics and compliance policy in their areas of responsibility/in the context of their missions through a Declaration of Compliance.
- This Code of Conduct and the EuroCompliance compliance programme are assessed and updated as often as necessary and at least once a year during a Management Review meeting and an Impartiality Committee.
- EuroCompliance has procedures, in accordance with its privacy rules, for dealing with alerts relating to:
 - failure to comply with this Code by one of its partners, business associates or subcontractors;
 - complaints against organizations certified ISO37001 by EuroCompliance.

PROFESSIONAL ALERTS

Alerts can be reported directly to EuroCompliance's officers at the following address: alerte@eurocompliance.com or through the internet platform: <https://eurocompliance.signalement.net/entreprises>

Alerts about credible events will give rise to an impartial internal or external investigation in accordance with the rules of privacy and the protection of the various persons concerned with the alert (i.e. originators of the alert, persons who are the subjects of an alert, witnesses, etc.).

The persons who receive the alert inform the originators of the alert of the response given to their testimony. They take the appropriate measures to deal with the situation if a real problem is observed. EuroCompliance reserves the right to take legal proceedings against persons who commit fraudulent acts harmful to its reputation or to the quality of its services.

EuroCompliance and its officers agree not to take any form of retaliation against the originators of alerts reporting facts in good faith, but which turn out to be inaccurate.



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