

SOCOTEC

CODE OF ETHICS SOCOTEC GROUP

MARCH 2024



SOCOTEC

CONTENTS

A word from the Chairman

- 1** SOCOTEC Group Values and Principles
- 2** Code of Ethics - Rules in Detail
- 3** Code Implementation

A WORD FROM THE CHAIRMAN



Hervé Montjotin
CEO of SOCOTEC Group



Our geographical expansion and the strengthening of our expertise is central to our international leadership ambition. Embodying strong leadership in our construction, infrastructure and industry segments requires everyday rigour and discipline with regard to compliance with our professional Code of Ethics and the transposition of our values in everything that we do for our teams, our customers and our partners.

I want this Code of Ethics to embody our values and commitments and to be our code of conduct.

Being a trusted third party means respecting shared, collective and individual ethical values that are part of a proactive approach.

Sustainably embarking our Group in an approach of impartiality as regards compliance, excellence in the quality of our actions and a respectful approach to individuals and sustainable development in our relations with all of our stakeholders requires acceptance by all, wherever we are located.

This Code of Ethics is a tool that must guide our actions, a vector of consistency and cohesion, and a code of good conduct including the principles set by the Group and the applicable laws.

Each manager must inform new hires about the code and give meaning to these principles that are central to the success of our leadership project, the promotion of our brand and its purposeful use for international outreach.

These ways of behaving that are central to our code of good conduct should enable us to confirm our positioning as a key player if each one of us ensures compliance with all its principles and adopts the appropriate working methods. We must be irreproachable.

I am counting on you and your commitment to make SOCOTEC Group the leading player that builds trust with all of our stakeholders.





SOCOTEC

1 VALUES AND PRINCIPLES GROUP

VALUES GROUP

To define our Group's values is to define the spirit that drives us, the philosophy that brings us together. They constitute a heritage and an identity that we share. Throughout the world, our values help to build our professional approach and permeate the relationships we maintain with our clients, our employees and our partners.



COMMITMENT & EXCELLENCE

- **Acting in an exemplary way.**
- **Commitment** emphasises our employees' pledge to uphold standards in their everyday work, to go the extra mile for clients in minimising risk, to cooperate with and support colleagues, and to act responsibly to build a safer and more sustainable world.
- **Excellence** reflects our constant quest to improve our skills and knowledge, anticipating future needs so we are always at the forefront of our profession as a **trusted third party**.



AUDACITY & INITIATIVE

- **Taking risks with an entrepreneurial spirit: agile and reliable at all times.**
- Know how to question the everyday life at the heart of our activities. And by teaming up across disciplines and combining our energies, we open up new possibilities, developing **innovative solutions** that make for differentiation and **added value**. Through audacity, we enable our clients to go faster and further, thereby enabling them to anticipate future developments.



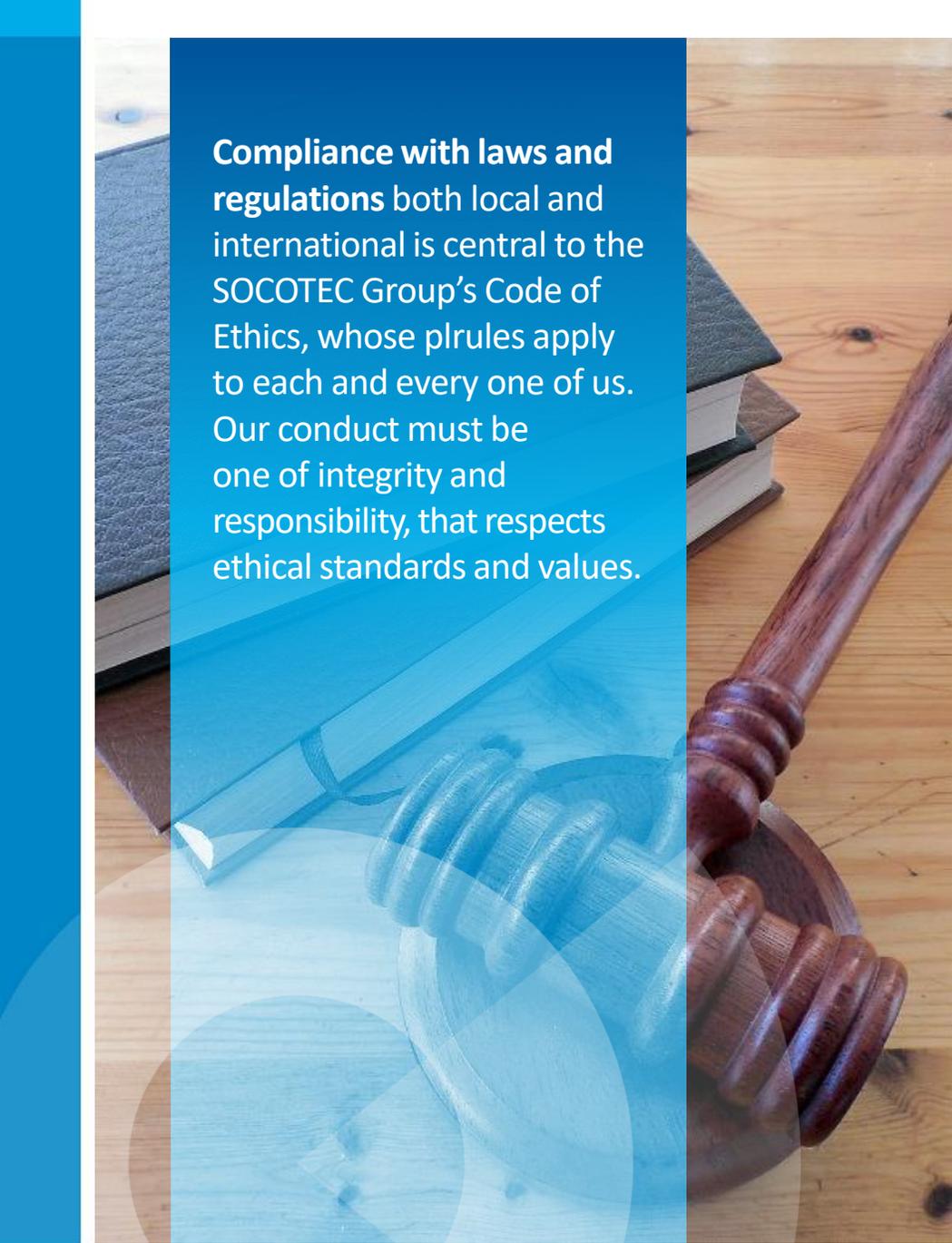
RESPONSIBILITY & SOLIDARITY

- **Being a solution provider: risk management, green transition, urban development and cities of the future, sustainable development.**
- At SOCOTEC, professionalism is a personal challenge measured both by clear, individual objectives owned by each team member, and by common objectives that are shared company-wide. For our clients, this spirit of responsibility is a pledge of our teams' **quality and professionalism**.
- Coupled with **societal responsibility**, it conveys our purpose and how each of us is pledged to safeguard people's safety, and the challenges related to the City of the future.

2

CODE OF ETHICS DETAILED RULES

- 2.1** Compliance with Laws and Regulations
- 2.2** Respect for people
- 2.3** The Group's interests
- 2.4** Vigilance - Anti-corruption
- 2.5** Environment and sustainable development



Compliance with laws and regulations both local and international is central to the SOCOTEC Group's Code of Ethics, whose principles apply to each and every one of us. Our conduct must be one of integrity and responsibility, that respects ethical standards and values.

COMPLIANCE WITH LAWS AND REGULATIONS

This fundamental principle must guide the day-to-day work of SOCOTEC Group employees.

This requirement guarantees the integrity and the reputation of our Group and all of us individually.

Our strength is our presence worldwide which implies compliance with all the standards applicable in each of our platforms and subsidiaries, both locally and internationally.

Any breach of laws and regulations may result in the civil and/or criminal individual liability of every employee in each country.

These breaches can tarnish the Group's reputation and damage our ambitions, which is why we insist on zero tolerance towards infringing behaviours.

We work together to achieve exemplarity.



Defending the integrity of individuals and human dignity in all Group companies, the unconditional compliance with human rights is the main vector of our everyday activities.

RESPECT FOR PEOPLE

This requirement revolves around our actions to help our employees and our stakeholders to comply with applicable standards both in France and abroad.

Integrity and respect for people are central to the SOCOTEC Group's values.

The SOCOTEC Group complies with the principles of:

- of the [United Nations Universal Declaration of Human Rights](#);
- The eight fundamental conventions of the [International Labour Organisation \(ILO\)](#), particularly regarding forced labour or child labour;
- and the principles of the [UN Global Compact](#).

Human capital constitutes SOCOTEC Group's major asset.

So respect for Group employees is a key value.

Diversity and equal opportunity are values that our Group holds dear, that all employees must comply with and respect wherever in the world they may be.

Diversity enables complementarity and efficiency.



SOCOTEC Group cares deeply about **diversity and equal opportunity** for all our employees, regardless of their level of seniority or where they work across the world.

RESPECT FOR PEOPLE

THE FIGHT AGAINST DISCRIMINATION AND HARASSMENT - DIGNITY

There is no place for any form of discrimination within the Group and any such act will be firmly penalised.

Discrimination arises whenever one or more persons are treated differently or adversely on account of their personal characteristics, their beliefs, their convictions, or for any other reason prohibited by law, including national or ethnic origin, culture, religion, political beliefs, age, gender, sexual orientation, physical condition and mental or physical deficiency.

SOCOTEC ensures that the following forms of behaviour have no place in our Group:

- behaviour leading to an **intimidating or offensive environment** towards any employee, intern or temporary worker within the Group;
- behaviour liable **to offend the sensitivity of others**, i.e. any attitude of a **violent or sexual nature**, most notably but not exclusively any unwanted physical contact, any **act or assertion with sexual connotations, whether written or spoken, and any dissemination of indecent images**.

Any attempt to obstruct the reporting of conduct that breaches these principles will be also penalised. **Only the promotion of skills and the rewarding of work and commitment can dictate the assessment and advancement of the Group's employees.**



Our Group was already safeguarding data protection through compliance with the regulations issued by the French Data Protection Authority (CNIL).

The application of **GDPR*** led to the deployment of a project to bring Group subsidiaries into compliance with this system.

The Group also had deployed a specific policy on cybersecurity to which applies a specific process on crisis management with a dedicated governance.

RESPECT FOR PEOPLE

PROTECTION OF PERSONAL DATA - GDPR

We guarantee the confidentiality of personal data relating to our employees, and also of the data we exchange as part of our internal business relations within our Group or with our stakeholders.

As employees of the SOCOTEC Group, we will comply with this confidentiality as part of our duties.

Accordingly, **we will make sure that data is never collected, copied or used without the prior consent of the data subject and without due necessity.**

We will ensure that no data is ever distributed to any third party, whoever they may be, or to any other person unless duly authorised.

The Data Protection Officer can be contacted at: dataprotection@socotec.com

* GDPR = the General Data Protection Regulation (ER No. 2016/679)



The SOCOTEC Group depends on the **loyalty and reliability of its employees**, who promote the image of the Company to its partners and suppliers.

THE GROUP'S INTERESTS

PRIDE IN BELONGING

The Group's reputation is based on the integrity of its employees and their dedication to SOCOTEC.

As a result, we are at all times duty-bound to never disparage the company or its leaders in public, or through statements to the media.

It is also our duty to **respect the confidentiality** of sensitive or internal information, in particular the know-how and commercial and technical strategies developed within the Group.

Personal ethics, the Group's values and good sense in the use of the SOCOTEC brand are the principles that should guide our actions.

Acting with rigour, consistency, integrity and independence in the use of our skills is essential to our image and the spirit of cohesion that should unite us and make us proud to do our job.

As the Group's employees, we are duty-bound to protect and not harm the SOCOTEC brand or any of the brands that are the Group's intellectual property.

THE GROUP'S INTERESTS

INTELLECTUAL PROPERTY

Our brand, consisting of our logo and the SOCOTEC name, is registered and protected trademark throughout the world.

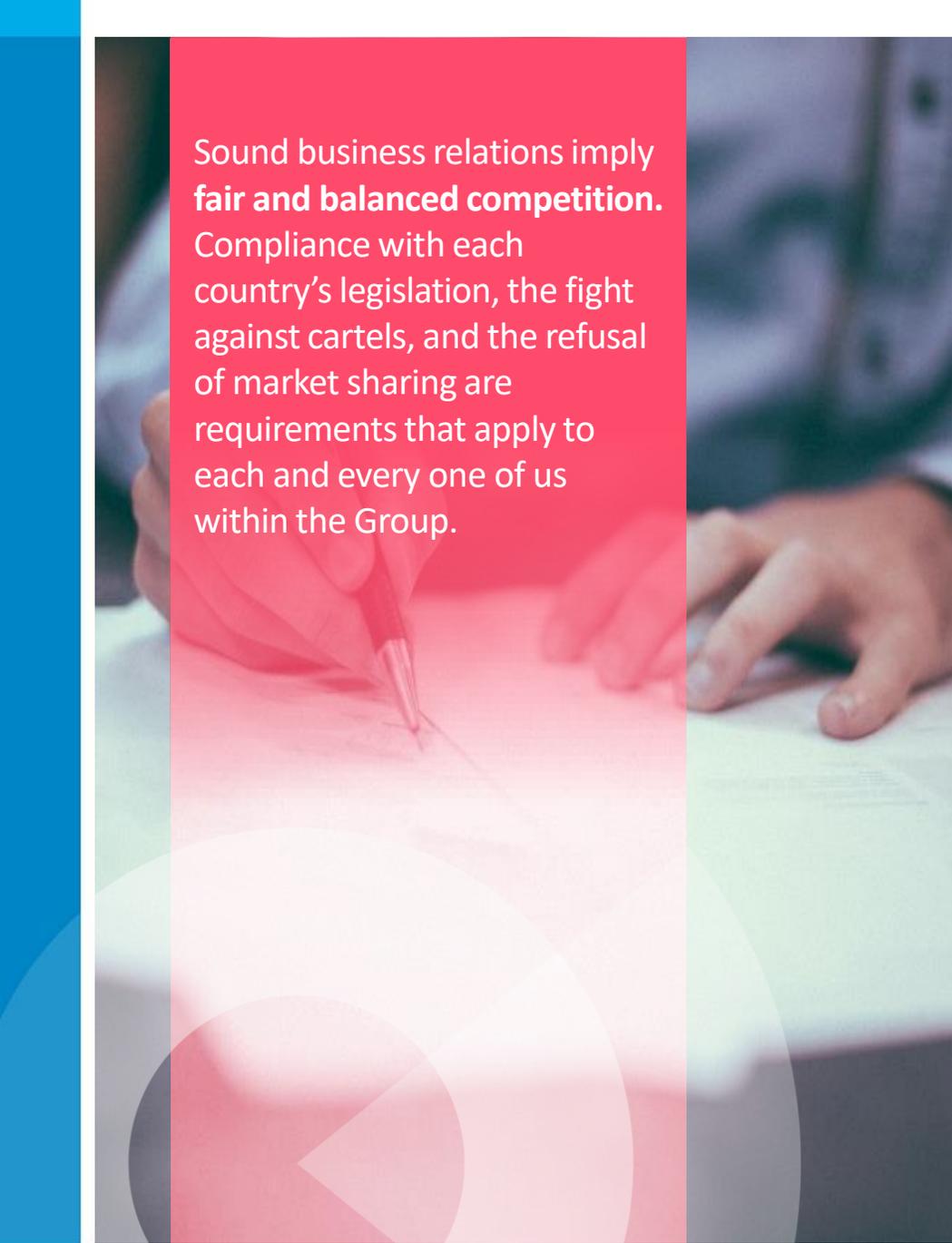
The "SOCOTEC Certification International" certification mark, derived from the SOCOTEC trademark, is also the Group's intellectual property. Their use complies with specific rules that are formally presented in dedicated graphic guidelines.

Respect for our visual identity and the compliant use of our logo, as stipulated in the graphic guidelines provided by the Communication & Marketing Department, are mandatory in order to guarantee the integrity and influence of our brand.

No creation of a new brand or domain name, or use of our brand name by third parties can be made without prior approval from the Communication & Marketing Department (cf. Partnership Procedure).

The use or reproduction of SOCOTEC brands by the Group's employees is totally prohibited outside the scope of their functions and would be seen as tantamount to counterfeiting. Any intellectual creation, derived from confidential information acquired by an employee within the scope of his or her functions and activities with the SOCOTEC Group, also belongs to the Group, even if this creation has been produced outside the scope of the employee's functions.





Sound business relations imply **fair and balanced competition**. Compliance with each country's legislation, the fight against cartels, and the refusal of market sharing are requirements that apply to each and every one of us within the Group.

THE GROUP'S INTERESTS

CONFLICT OF INTEREST AND COMPETITION

We must pay particular attention to conflict of interest situations, i.e. any situation where personal interests clash with the interests of the Company.

Actual conflicts of interest arise whenever the objectivity, independence or judgement of a person is jeopardised by a divergence between personal interests and the professional or public interest. Potential conflicts of interest arises whenever there is a reasonable likelihood of a conflict of interest occurring. Apparent conflict of interest arises whenever an observer may reasonably conclude that a conflict of interest could exist, even if this proves to be untrue.

Line management should be informed without delay by any employee in the event of potential conflict of interest and persons should refrain from any action in suspected cases.

The SOCOTEC Group respects the right of employees to proceed with investments or businesses outside their working environment, providing that any such activity is legal and compatible with the Group's own interests.



Relationships with clients and business partners require a climate of **collaboration, mutual respect and trust based on integrity and honesty.**

A suppliers' Charter is available within the Group

THE GROUP'S INTERESTS

RELATIONS WITH THIRD PARTIES: CUSTOMERS AND BUSINESS PARTNERS

These relations require a climate of **collaboration, mutual respect and trust based on integrity and honesty.**

With all our clients, we have to aim for excellence by endeavouring to guarantee quality and professionalism through clearly established relationships negotiated in good faith.

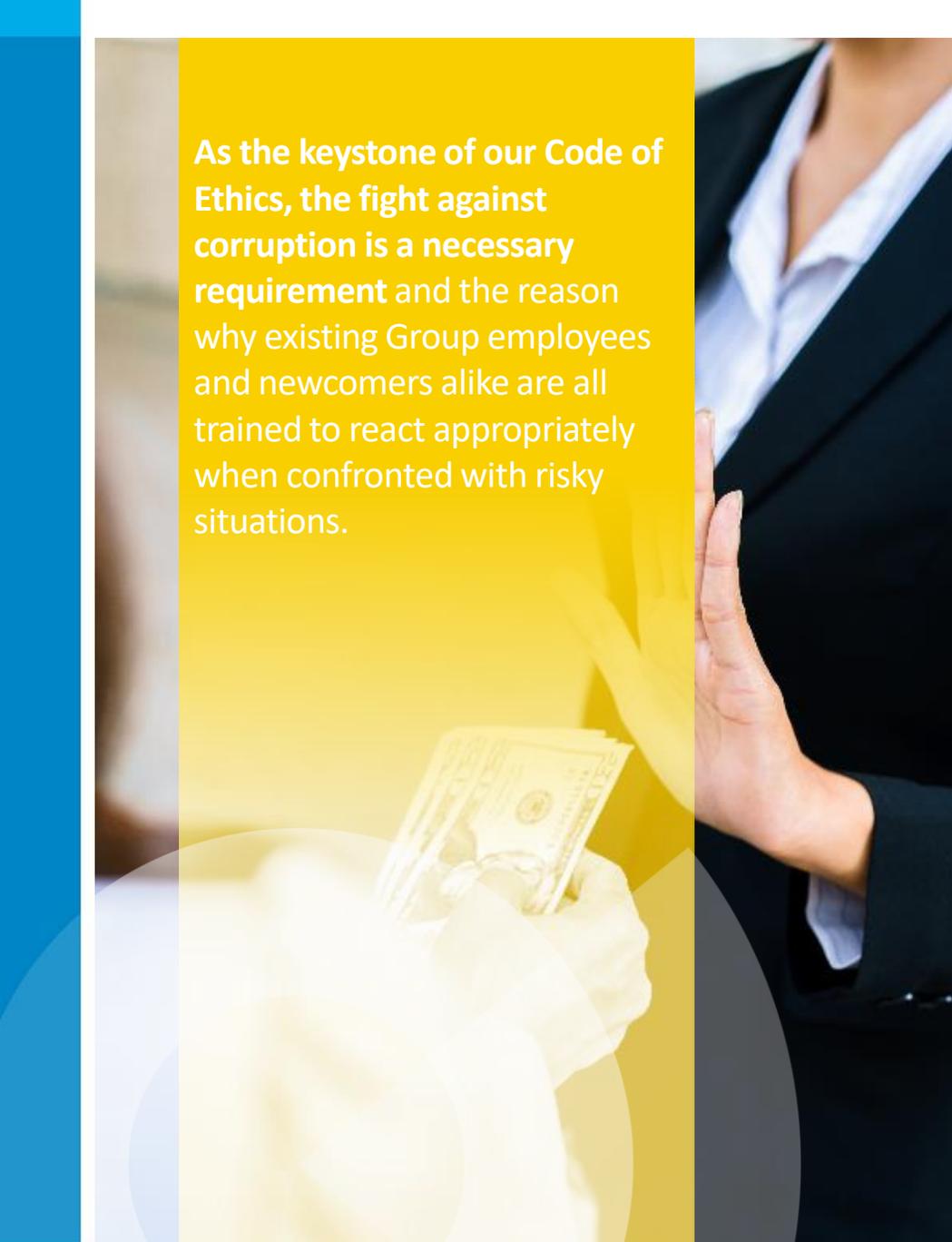
Balanced and sound relations with our third parties : suppliers, subcontractors and consultants, are essential for the Group's success and development.

To this end, the Group's procurement procedures must be strictly respected both when selecting reliable and honest operators and monitoring contractual relationships.

Accordingly, the implementation of a due diligence* process must also be observed by all. The Due Diligence and selection process for third parties is available on the intranet. In this respect, our third parties, and trusted partners, may be required to complete statements of compliance.

For any questions, employees may contact the Group Compliance Officer or the Local Compliance Officer.

** Due diligence is a prior analysis of the context of any transaction with a third party (clients, first-tier suppliers and intermediaries) with whom the company wishes to enter into a contract.*



As the keystone of our Code of Ethics, the fight against corruption is a necessary requirement and the reason why existing Group employees and newcomers alike are all trained to react appropriately when confronted with risky situations.

VIGILANCE - ANTI-CORRUPTION

FIGHT AGAINST CORRUPTION

Corruption

Corruption is committed when a person holding a given function (public or private sector) **requests or accepts any form of gift or benefit with a view to carrying out, or failing to carry out, an act that falls within the remit of his or her functions.**

Distinction is made between:

- **active corruption:** offering any form of gift or benefit to the person holding the given function, and;
- **passive corruption:** when the person holding the given function accepts the gift or the benefit.

In France, these offences carry a 10-year jail sentence plus a fine of up to a million euros, the amount of which may rise to twice the monetary value of the offence.

If in doubt, please contact the Ethics Committee.

All acts of corruption or unethical behaviour must be reported using the Group's internal whistleblowing procedure.



Gifts and invitations must be of reasonable value and frequency, be granted in good faith, be adapted to the circumstances, be given to one single commercial contact and be recorded in a transparent manner. **The ceiling for any gift received or given is set at €100 in Europe and adapted to the local lifestyle in the subsidiaries.**

VIGILANCE - ANTI-CORRUPTION

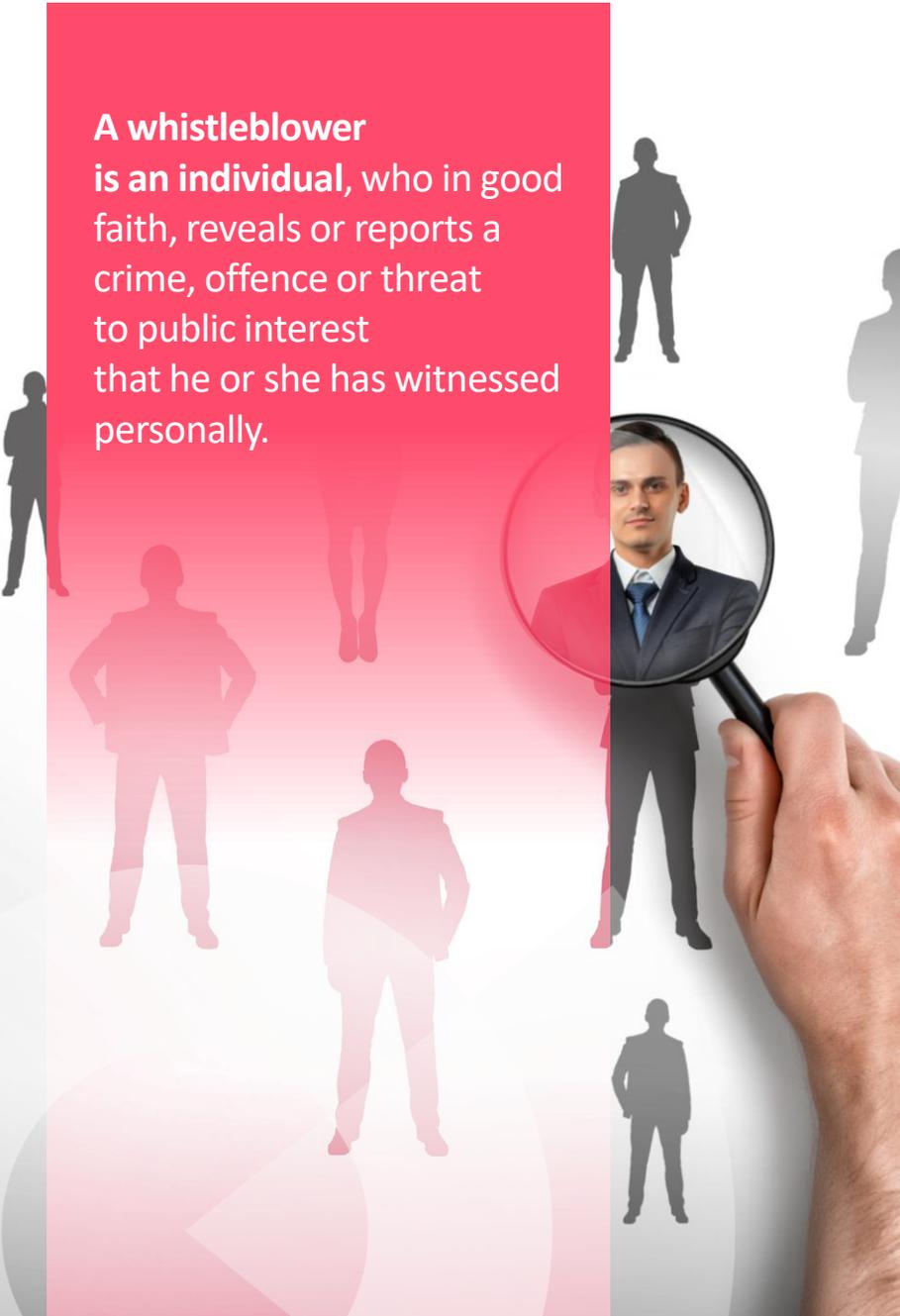
FIGHT AGAINST CORRUPTION

Gifts

Gifts and invitations must not be used, or give the impression of being used, for purposes of corruption. **In every case, they must comply with the Group's gift procedure and with the general principles as follows:**

- **Comply with both local and international laws and regulations**
- Made only **on the occasion of a special event** (festive seasons, holidays season, New Year...) or **in connection with a legitimate objective** linked to the company's business (signing of a contract, meetings, visits to facilities...)
- Adhere to the **social and cultural practices** of the country concerned
- Always **be appropriate to circumstances**, and specifically **prohibited in the event of a major ongoing business transaction** (tender, drafting of riders, etc.)
- **Never be in cash**
- **Be reasonably valued**, matching the status of the recipient, including repeat gifts
- Be made only to the **business contact and be given in a transparent manner**
- Always **be recorded in a transparent manner** in the company's accounting records or declared to the line manager.

The gift procedure for SOCOTEC Group employees is available on the Intranet or from line managers.



A whistleblower is an individual, who in good faith, reveals or reports a crime, offence or threat to public interest that he or she has witnessed personally.

VIGILANCE - ANTI-CORRUPTION

FIGHT AGAINST CORRUPTION - RAISING THE ALARM

When you are faced with a case of corruption or unethical behaviour, you may raise the alarm.

If in doubt, any Group employee may contact his or her line manager or the Group's Compliance Officer or the Ethics Committee, who will advise as to further action.

Every whistleblower will benefit from the most extensive protection, both inside and outside the firm, to avoid any harassment when and after reporting, regardless of the outcome. He or she may remain anonymous.

All reports from whistleblowers will be processed with complete confidentiality, and they will be safe from any form of reprisal, discrimination or retaliation.

Apart from situations of serious and imminent danger, whistleblowers must comply with the procedure presented on our websites.



A whistleblower may use the dedicated page on the [socotec.com](https://www.socotec.com) website, or the email address for the Ethics Committee: ethics.committee@socotec.com



Money laundering and the misuse of corporate assets are crimes.

VIGILANCE - ANTI-CORRUPTION

FINANCIAL VIGILANCE TRANSACTIONS AND TRANSFERS OF FUNDS

Money laundering consists in concealing funds from illegal activities. **The misuse of corporate assets** consists in knowingly using assets, credit, powers or the corporate voice for direct or indirect personal purposes.

The Finance Department systematically checks the origin of the funds and financing as well as all transactions taking place via the Group. It frequently sends KYC forms to the banking partners.

As employees of the SOCOTEC Group we are all duty-bound to remain vigilant when it comes to making payments, particularly through partners or to suppliers.

If any part of a proposed transaction appears inappropriate or likely to breach any applicable law or regulation or the Group's policies and procedures, the Finance Department, the Ethics Committee or the Group Compliance Officer must be informed immediately.

The Treasury Charter is available on the Intranet and on request for Group employees.



The Code of Ethics runs in parallel with the SOCOTEC Group's authorisation guide.

VIGILANCE - ANTI-CORRUPTION

INTERNAL AUDITS - CONTROL BODIES

The Code of Ethics runs in parallel with the **SOCOTEC Group's Managers' Authorisation Guide**. It also covers ethical behaviour and good conduct.

The Ethics Committee is responsible for the application of the Code of Ethics, the receipt of alerts relating to unethical behaviour, and the monitoring of the application of provisions from anti-corruption laws. It is made up of three members*. It may be contacted via the socotec.com site or by email at ethics.committee@socotec.com

The Commitment & Investment Committee is responsible for all questions relating to the SOCOTEC Group's rules of commitment assigned to it. To contact it, the referral file is available on the Intranet*.

The Risk Committee is responsible for any sensitive questions relating to the Construction & Real Estate France business line*.

The Socotec Group also has an internal auditor.

** The list of referral topics is available on the socotec.com site or Intranet, as are the contact details of its members for any request.*

ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

The Group undertakes to reduce the impact of its activities on the environment and to comply with international laws in this area. In this respect, we have committed to actions to improve the prevention of environmental risks and pollution.

As SOCOTEC group employees, we are part of this shared effort and contribute in our day-to-day work.

In the conduct of our missions and our business, we aim for maximum standards of respect for the environment.

[A Sustainable Development Charter is available on the Intranet.](#)

Our commitment to the **protection of our environment and to sustainable development** is firmly established through actions such as:

- Reducing energy consumption through the **rational and sustainable use of energy**, specifically in our buildings and works premises;
- Reducing consumption of **paper** together with the application of savings techniques in every entity throughout the Group;
- The sustainable use of **natural resources** on a daily basis;
- The **firm's long-term future** through development and improved economic performance;
- **Sustainable employment** through an active policy of training and qualification for our employees to maintain their employability;
- The **reduction in greenhouse gas emissions**, through the consideration of our organisational methods and use of vehicles;
- The **reduction in waste and the systematic reclamation** of recyclable materials.

“Guaranteeing safety and preserving the health of our employees, through a rigorous prevention approach and an operational risk management approach”

*Extract from the Quality and Safety policy of the SOCOTEC Group's CEO
Hervé Montjotin*



SAFETY

Safety is central to the SOCOTEC Group's concerns:

- Through our businesses and the assignments that we carry out, we are more or less exposed to risks. Our main duty is to make our company a framework for the safety and security of all of our employees both in our offices and when on assignments.
- **For this purpose, we train our teams in the rules of workplace health and safety. We comply with our obligations and responsibilities in this area.**
- As road accidents are our main risk, **we are carrying out a program of reinforced actions on prevention and road safety. We are involving all our managers and their teams in a continuous improvement process.** We are signatories of the French road safety charter with the interministerial delegate.
- The SOCOTEC Group supports our customers in preventing and managing risks in the areas of Quality, Health, Safety and the Environment. Wherever men and women live and work, we work to prevent risks.

This is our purpose. As such, we must be exemplary in our relations with our customers.

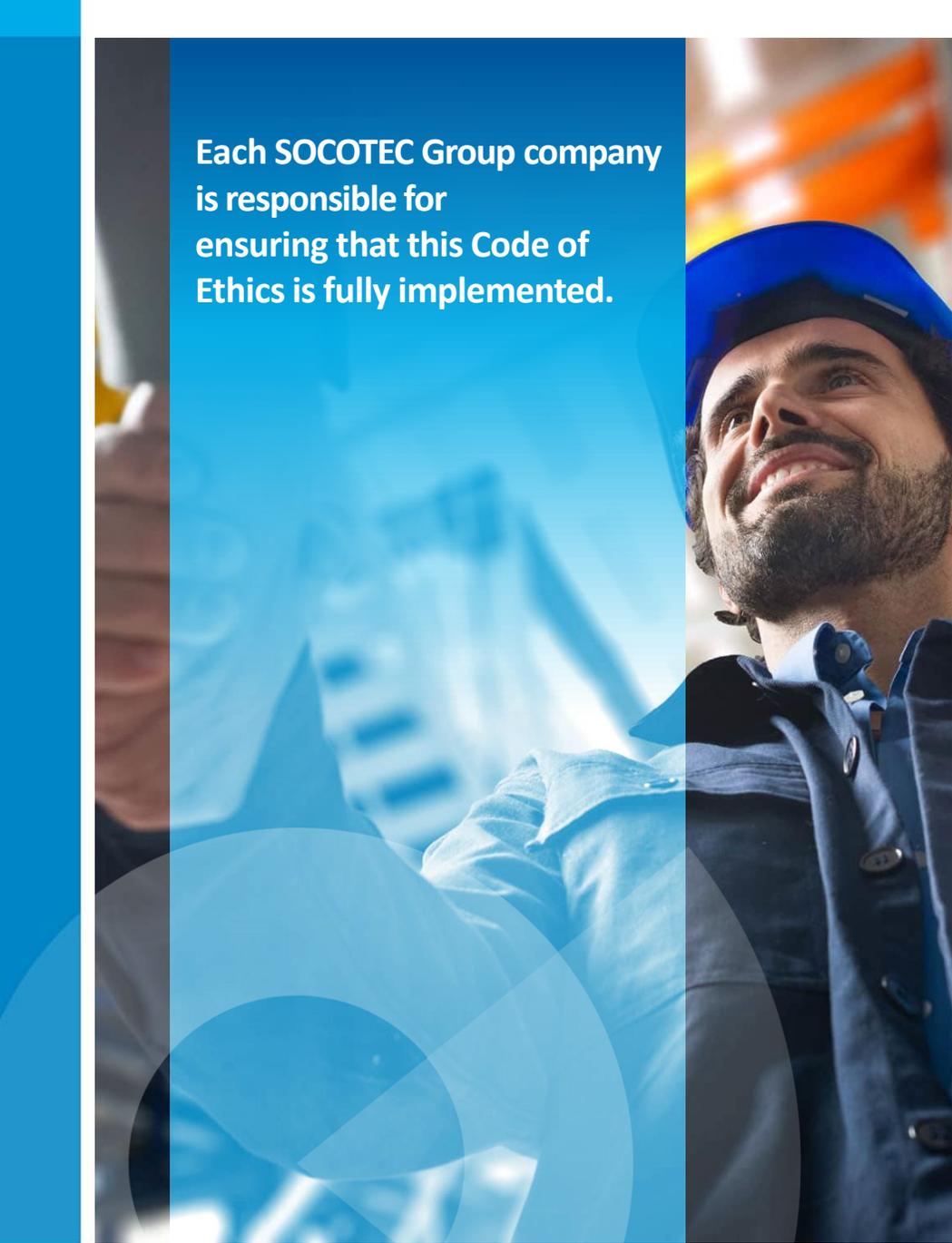
- Our positioning as a trusted third party confers an additional requirement for exemplary behaviour and performance in these areas.



SOCOTEC

3

IMPLEMENTATION



Each SOCOTEC Group company is responsible for ensuring that this Code of Ethics is fully implemented.

IMPLEMENTATION OF THE CODE OF ETHICS

APPLICATION OF THE SOCOTEC GROUP'S CODE OF ETHICS

Each SOCOTEC Group company is responsible for ensuring that this Code of Ethics is fully implemented, according to the restrictions and specifics of its business activity and geographic location.



To this end, we must all remain vigilant in our daily business life, but also with those around us in our teams or with people placed under our responsibility.

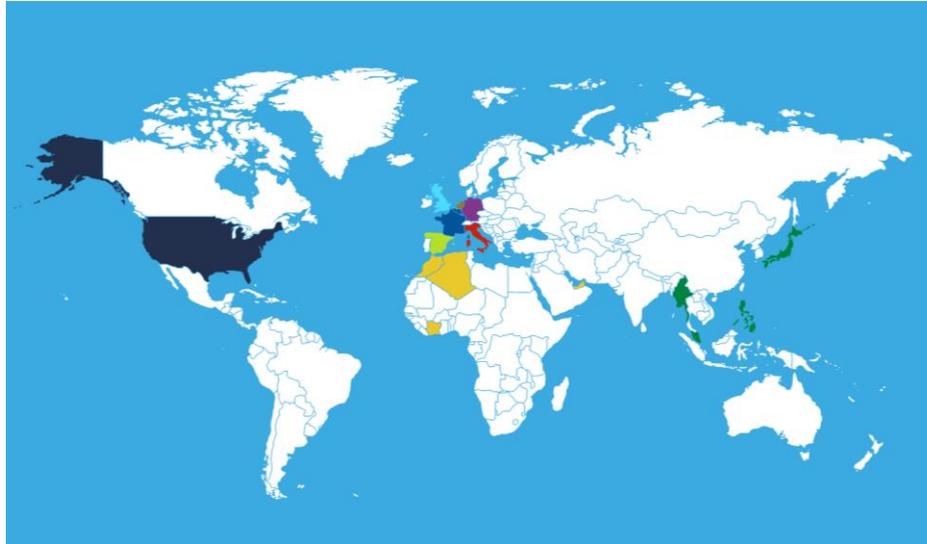
The SOCOTEC Group makes sure that each Group employee has full knowledge of, and has understood, this Code of Ethics. It has been included in the systems that govern collective labour relations (by-laws in France, the Handbook in the UK & USA...).

SOCOTEC Group's Ethics Committee is made up of three permanent members, is responsible for ensuring that whistleblowers are protected:

- ✓ **Sebastien BOTIN**: Group Human Resources Director
- ✓ **Eléonore LARRAMENDY**: Group General Secretary
- ✓ **Charlotte BECQUART**: Group Compliance Officer

The Group Compliance network led by the Group Compliance Officer ensures that our ethical values are widely disseminated throughout the Group.

GROUP COMPLIANCE NETWORK



The Local Compliance Officers assist the Group Compliance Officer in the local dissemination of the Code of Ethics and the training of employees on subjects related to the Code of Ethics in the various Group subsidiaries. They may also be invited to participate in investigations carried out by the Ethics Committee to respond to alerts.

The list, which is frequently updated, is also available on the Internet.

Group Compliance Officer

Charlotte BECQUART

Local Compliance Officers

Platform UK

Jason GOODWIN

Platform USA

Livia CORREDOR

Platform Italy

Marco ILLIANO

Platform Germany

Ludger SPEIER

Platform Netherlands

Charlotte BECQUART

Platform Spain

Gérard COLOMER

Asia Area

Dave Cheng LOON

MENA Area

Charlotte BECQUART



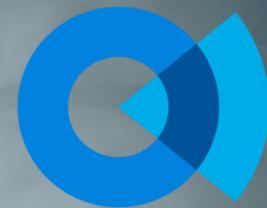
Any person may launch an alert for non-compliance with the rules of the Code of Ethics.

The whistleblower may use:

- the dedicated page on the socotec.com site
- or the email of the Ethics Committee: ethics.committee@socotec.com

The report will remain confidential

Let's work **TOGETHER**
to be **EXEMPLARY**



SOCOTEC