



BUREAU VERITAS CORPORATE CITIZENSHIP & PHILANTROPY POLICY

GROUP CSR-001-PO V3

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**BUREAU
VERITAS**

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	Group CSR 001-PO	Date done:	May 2022

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). Its 2025 CSR strategy focuses on 5 SDGs, among the 17 existing ones, which are the most meaningful considering the Group vision, mission and values. These 5 SDGs are:

- SDG #3: Good health and well-being
- SDG #5: Gender equality
- SDG #8: Decent work and economic growth
- SDG #13: Climate action
- SDG #16: Peace, justice and strong institutions

The present Corporate citizenship and philanthropy policy is naturally aligned with the Group strategy and it consequently focuses on these 5 SDGs.

The Group policy focuses its charity actions on 3 major topics:

- **HEALTH & SAFETY**, corresponding to SDG #3: Good health and well-being.
This priority is at the heart of Bureau Veritas day to day business.
- **INCLUSION**, corresponding to SDG #5: Gender equality.
Inclusion corresponds to one of the major Group engagements of its CSR strategy. It is also aligned with our social audit activities.
- **ENVIRONMENT**, corresponding to SDG #13: Climate actions
Protecting the environment, preserving biodiversity mitigating climate change are activities at the heart of Bureau Veritas mission.

Bureau Veritas citizenship and philanthropy policy follows the Business for Societal Impact (B4SI) model (<https://b4si.net/>) described hereunder¹.



¹ © Corporate Citizenship Limited 2019. The B4SI Framework and the B4SI Guidance Manual are made available for use and licensed under the Creative Commons Attribution-NoDerivatives 4.0 International License.

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4 - Types and categories of charity actions

Bureau Veritas' charity actions and charity expenses are sorted into non-overlapping categories.

Charity expenses are split in 4 types:

- **Donations:** Cash spent on donations, matched employee giving, cause related donations etc.
- **Volunteering:** Cost of employee time spent volunteering in the community during working time
- **In-kind donations:** In-kind products, services and facilities valued at cost
- **Management costs:** Management costs associated with running community programme

Charity actions are split in 3 categories:

4.1 Charitable donations - Intermittent support to a wide range of good causes in response to the needs and appeals of charitable and community organisations.

Examples of charitable donations include:

- *Donations of cash, products, services or equipment to local, national and international charitable appeals*
- *Social 'sponsorship' of causes or arts / cultural events with name recognition for the company that is not part of a marketing strategy*
- *Grants from corporate foundations that are not linked to a core community strategy*
- *Company-matching of employee donations and fundraising*
- *Costs of facilitating donations by customers and suppliers*
- *Costs of employees volunteering during working hours, if not part of a core community strategy*
- *Gifts of products from inventory at cost*
- *Occasional use of company premises and other resources*

4.2 Community investment - Longer term involvement in community partnerships to address a limited range of social issues chosen by the company in order to protect its long-term corporate interest and to enhance its reputation.

Examples of community investments include:

- *Membership of, and subscriptions to, charitable organizations that help to deliver the community engagement strategy*
- *Grants, donations (cash, product, services or equipment) to community partner organizations*
- *Secondments to a partner community organization and other staff involvement, such as technical and managerial assistance to a partner organization*
- *Time spent supporting in-house training and placements, such as work experience*
- *Use of company premises and other resources for partner organizations*
- *Costs of supporting and promoting formal employee volunteering programs*

4.3 Commercial initiatives - Commercial activities are business-related activities to support the success of the company and promote the Bureau Veritas' brand(s). They are usually undertaken

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by departments outside the community function and often involve partnerships with not-for-profits.

Examples of commercial initiatives include:

- *The sponsorship of events, publications and activities that promote corporate brands or corporate identity*
- *Cause-related marketing and activities to promote sales (e.g. making donations for each item bought)*
- *Support for universities, and research and other charitable institutions related to the company's business or aiming to improve the image of the brand or perception of the company*
- *Exceptional one-off gifts of property and other assets*

5 – Governance

Bureau Veritas organization is decentralised in Operating Groups (OG), with 2 vertical OGs (Marine & Offshore and Consumer Product Services), 5 Horizontal OGs (France & Africa, South & West Europe, North America, Latin America and Asia-Pacific & Middle East) and 1 Head Office OG.

Charity actions are selected and financed by each Operating Group.

Operating Groups shall follow 3 Group recommendations when choosing charity actions:

- 1 Charity expenses: 80% of Operating Group charity spending shall be dedicated to the 3 Group priorities (Health, Inclusion and Environment). The 20% remaining spending can be allocated to any other sustainable topics that are locally relevant.
- 2 Charity actions: Operating Groups should give priority to Community investment with long-term involvement in community partnerships to protect BV long-term corporate interest and to enhance its reputation.
- 3 Code of Ethics (see below): Prior approval of the Group Compliance Officer is mandatory for all charity actions. The request for authorisation shall be sent through the Webrisk Tool (<https://webrisk.ventivtech.eu/>) using the “Charitable donations and sponsorships” compliance request form (see chapter 9).

6 - Group reporting

Charity actions must be recorded and reported by each Operating Group in 4 categories (see charity expenses in Chapter 4 above):

- Donations by Cash equivalent contribution
- Volunteering: Employee Time during working hours
- Donations by In-kind service or product giving
- Management overhead of charitable actions

For each charitable action, the following information must be recorded:

- The input
 - The expense category (see above list)
 - The SDG the action is attached to (see Chapters 2 and 3)
 - The organization that is benefiting from the charity action

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- The output
 - The explicit description of the action
 - The date of the action
 - The value of the action (cash given, or cost of in-kind service and product given, number of working hours for volunteering)
 - The Webrisk request reference (<https://webrisk.ventivtech.eu/>)
- The impact
 - Community impact
 - Business impact
 - Environment impact

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.

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.



9 - Code of Ethics applicable policy and procedure

Charitable donations and sponsorships (referred above as “charity actions”) 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 organization 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.

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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 Webrisk request for Approval of Charitable Donations and Sponsorships form 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 organizations.

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 (<https://webrisk.ventivtech.eu/>). 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 registration

All charitable donations and sponsorships must be recorded in a specific ledger account in the local entity's accounting records: 62383.

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 Group compliance officer.

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.

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Validation and communication are ensured according to the Group documents management process. QHSSE 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
Function	CSO	Legal & Compliance	CSO
Names	Marc Boissonnet	Arnaud Douville	Marc Boissonnet
Date	16/05/2022	21/04/2022	21/04/2022

Revision History:

Version	Date	Comments
1	29/11/2019	Creation of the document
2	15/09/2020	Alignment with new 2023 CSR strategy
3	16/05/2022	Alignment with Business for Societal Impact (B4SI) model