



# CODE OF CONDUCT

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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. Therefore, it seems 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 based in particular on the degree of confidence of the stakeholders in the issuing body. Therefore, our priority is to be impartial about any type of decision and professional in each of the missions 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 describes our values. It is part of EuroCompliance's statutes and is signed by each of its partners and auditors.



Céleste Cornu  
*Présidente*



Philippe Lesoing  
*Directeur Général*

# OUR PRINCIPLES

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EuroCompliance, its partners, business associates and subcontractors are all committed to working in accordance with the values of corporate social responsibility as stated in the UN Global Compact and the OECD guidelines for multinational enterprises.

This commitment is enforced through a series of principles and measures to ensure compliance

## COMPLIANCE WITH LAWS AND REGULATIONS

**EuroCompliance is committed to complying with the laws and regulations applicable in the countries where it does business.**

In this capacity it is held responsible to be duly informed about the laws and regulations applicable before carrying out any project and to ensure its understanding by its partners, business associates and subcontractors.

## 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 and subcontractor shall undertake to take part in agreements between competitors that have the intent or effect of fixing prices, distorting the bidding process, sharing a market, limiting free competition or boycotting a customer or supplier.

## PREVENTION OF CORRUPTION

**EuroCompliance applies a 'zero tolerance' policy in its fight against corruption, whether active or passive, within its business transactions with partners or clients in France or abroad.**

EuroCompliance's partners, associates and subcontractors shall resist all attempts to influence them or their decisions especially as regards audit certification. In that capacity, partners, associates

and subcontractors shall report all attempts of influence or corruption to EuroCompliance's President or General Director, so as to decide whether the commercial relationship must be terminated or if it may continue satisfactorily after applicable regulations and EuroCompliance's Code of Conduct have been reminded to the Client.

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

EuroCompliance prohibits any and all facilitation payments without exception since they are direct acts of corruption.

## IMPARTIALITY AND PREVENTION OF CONFLICT OF INTERESTS

**EuroCompliance's clients expect to be treated without any form of prejudice. Partners, associates and subcontractors are committed to making their decisions in an independent manner and without any conflict of interest.**

In particular EuroCompliance:

- prohibits all forms of self-assessment, where the company would assess its own work pursuant to consulting services.
- prevents all conflicts of interests, situations where 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 the organization. To do so, partners, associates or subcontractors:
  - must hold no direct or indirect interests in the business of a supplier, customer, competitor or any other party likely to influence their business decisions in the name of EuroCompliance;
  - must ensure, with every new task, that their personal situation does not show any conflict of interest. When it does, they must inform EuroCompliance's officers immediately so that the best decision can be made.

- must not undertake any task or work offered by a client or competitor likely to impinge on their performances or judgement while carrying out their duties for EuroCompliance. In particular subcontractors must inform an officer of EuroCompliance if they are led to conduct missions on a private basis for a EuroCompliance customer so that any situation of conflict of interest can be analyzed and managed with
- prohibits offering or receiving gifts and invitations to/from clients or partners, excluding promotional items (like pens or notebooks) and occasional small courtesy gifts – maximum twice a year per person- (less than €60.00 worth). Any exception must be agreed upon by a EuroCompliance officer, so that a decision can be made
- does not make donations to political parties or organisations;
- reviews sponsorship or sponsorship projects in the Executive Committee to ensure that they are not intended to favour business partner. EuroCompliance is mainly committed to organisations and projects related to the fight against corruption.

## CONFIDENTIALITY

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

In order to conduct their mission in good conditions EuroCompliance's partners, associates and subcontractors have access to confidential information. They must undertake not to disclose any confidential information, to retain the documents necessary only to the ongoing tasks (audit or training) and to destroy them at the end of the agreed statutory period of retention of clients' data.

In particular EuroCompliance's partners, business associates and subcontractors are committed to not releasing any information about EuroCompliance's clients, partners or clients' internal procedures.

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

As a rule EuroCompliance is committed to not releasing any information about them without the express permission of its clients.

## KINDNESS

**EuroCompliance is committed to respecting the fundamental rights of its partners, subcontractors and clients.**

Auditors need clients to be cooperative and transparent to carry out audits in good conditions, especially for the access to key people and internal documents. Auditors are committed to treating all and every auditee in a non-intrusive and respectful approach, even in case of a major problem.

Anticorruption management system assessment should not be investigative but based on attentiveness and continual improvement.

EuroCompliance's partners, business associates and subcontractors shall inform their clients about the documents they retain and present them a draft copy of their reports for accuracy control.

# IMPLEMENTATION PRINCIPLES

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## TO IMPLEMENT THESE COMMITMENTS:

- each EuroCompliance's partner, business associate and subcontractor expressly undertakes to comply with this Code of Conduct when contracting with EuroCompliance.
- each EuroCompliance's partner, business associate and subcontractor is duly and clearly informed about EuroCompliance's ethics and compliance programme in the course of their integration and training processes.
- EuroCompliance has procedures for dealing with alerts relating to:
  - failure to comply with this Code by one of its partners, business associates and subcontractors
  - complaints against organizations certified ISO37001 by EuroCompliance

## ALERTS

Alerts can be reported directly to EuroCompliance's officers or at [alerte@eurocompliance.eu](mailto:alerte@eurocompliance.eu).

Alerts about credible events will be investigated in an impartial manner internally or externally, within compliance rules and in accordance with the rules concerning the processing of personal data.

euroCompliance

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76 rue de la Pompe  
75116 Paris, France  
[www.eurocompliance.eu](http://www.eurocompliance.eu)

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