



CODE OF CONDUCT



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MORE THAN COOKIES...

I. PREAMBLE

The Bouvard Group is committed to conduct its business in an ethical and responsible way.

This code of conduct is based on the values of the company:

- ambition
- expertise and professionalism
- openness and humility
- the pleasure of sharing
- sustainable development

The purpose of the Code of Conduct is to ensure internally that all Bouvard Group employees act in accordance with these values and principles towards the environment and in their relations with stakeholders.

This code is intended to provide understanding and commitment to the expected behaviour of all employees, regardless of their position in the company.

This code of conduct is applied to all group companies but is subject to the various local regulations in force.



II. APPLICATION SCOPE

The code of conduct applies to all Group companies. It defines and illustrates the different types of behaviours to be prohibited as being likely to characterise acts of corruption or influence peddling.

For each company, compliance with the commitments is guaranteed by the management, which must apply and ensure the application of this code.

Any employee can notify his or her manager or a human resources representative of what he or she considers to be a breach of this code. The application of the code is ensured by the implementation of adequate procedures, structures and tools.

An internal alert system has been set up to collect reports from employees concerning any behaviour or situations that are contrary to the company's code of conduct. The person to contact is the Group Human Resources Director, who can be contacted at this number: +33 (0)4 74 30 00 09 to collect such information.

As a consequence, the code of conduct is attached to the Rules of Procedure. It has also been the subject of the consultation procedure with employee representatives and the related submission procedure.

The Group is also committed to promote these principles as part of its relations with stakeholders.



III. COMPLIANCE WITH LEGAL REQUIREMENTS AND GOOD PRACTICES

3.1 General layout

The Group and each of its companies are committed to complying with the legal requirements applying to all of their business activities.

In addition, the Group is particularly eager to the rules of good conduct, which are essential to the proper team functioning and a good working climate.

As a consequence, a charter of good practice in professional relations has been drawn up and sets out all the expected behaviour, both individual and in teams: respect, commitment and sharing, consideration, etc.

Everyone is therefore asked to be vigilant for signs of uneasiness and to react if necessary.

3.2 Fight against corruption

Biscuits Bouvard is eager to ensure compliance with laws and regulations relating to the fight against corruption and influence peddling. Furthermore, in the conduct of its commercial relations, the company takes into account the significant recommendations of national or international bodies in this area, both within the context of the tender procedure and in all commercial contracts conducted with our clients.



As a consequence, all employees must behave with integrity in all business relations.

Biscuits Bouvard is eager to ensure compliance with laws and regulations relating to the fight against corruption, influence peddling and the fight against money laundering (in particular the 1997 OECD Convention). Furthermore, in the conduct of its commercial relations, the company takes into account the significant recommendations of national or international bodies like the FOCA in terms of economic sanctions.

Within this framework, Biscuits Bouvard acts to prevent from any form of corruption and money laundering. This rule is particularly important when negotiating with government agencies or public institutions representatives. No employee may behave in a complacent manner towards active (offering a counterpart) or passive (accepting a counterpart) corruption.

Biscuits Bouvard only allows appropriate and licit gifts, services and entertainments which are offered as part of business relations.

Any offer made by an employee on behalf of Biscuits Bouvard of gifts, entertainments or free services may only be made if it is proportionate and in accordance with current legislation and common practices.

When an employee's personal, social, financial or political activities influence or are likely to influence his or her objectivity and loyalty to Biscuits Bouvard, a conflict of interest may arise and must be appropriately handled.



3.2.1 Risk mapping

A risk map presented as a documentation is created and updated on a regular basis. It is intended to identify, analyse and prioritise the risks of exposure of the company to external solicitations for the purpose of corruption, based in particular on the business sectors and geographical areas in which the company operates.

3.2.2 Assessment procedures

There are procedures for the assessment of the situation of clients, first-tier suppliers and intermediaries concerning risk mapping which applied in each call for tenders, and as part of an annual assessment.

3.2.3 Accounting

The bookkeeping is under strict control. In addition to internal controls, the financial statements are reviewed twice a year by independent accounting firms and audited by Statutory Auditors or similar bodies depending on the country. The Group's General Management also regularly conducts ad hoc control assignments.



3.2.4 Training

A training programme has been set up for managers and employees who are most exposed to the risks of corruption and influence peddling.

3.2.5 Sanction in case of breach to the code of conduct

In addition, as this document is attached to the Rules of Procedure, its provisions are mandatory. The breach to these provisions will lead to disciplinary sanctions.

3.2.6 Monitoring and internal assessment

Finally, an internal monitoring and assessment of the measures implemented is carried out once a year.



IV. PROHIBITION OF DISCRIMINATION AND HARRASMENT

The Group and each of its companies prohibit discriminatory practices.

By discrimination we mean any distinction, exclusion or preference which is likely to limit equality or opportunities for equal treatment, both in recruitment and in employment, and which is based on origin, skin colour, gender, religion, age, political opinion, national or social origin, sexual orientation, disability, family obligations or any other such consideration.

The Group and each of its companies are committed to promoting a work environment free of all forms of harassment.



V. GOOD PRACTICES WITH STAKEHOLDERS

The same rules of conduct are expected in dealings with third parties, Partners, Suppliers and Customers, and with any representative of the societal environment.

The Group and each of its companies contribute to the economic and social development of the regions in which it operates.

The company will strive to maintain balanced relationships in a positive influence and interaction, within the process of development.

Attention will be paid to ensure that there is no conflict of interest or personal interest unrelated to the general interest of the company. Hidden, direct or indirect payments or benefits are strictly prohibited.

Each employee will take care to give the appropriate image of the company in its external dealings and will commit to protect the group's reputation.



VI. INFORMATION, COMMUNICATION, STAFF INVOLVEMENT AND PROFESSIONAL DEVELOPMENT

The Group and each of its companies promote dialogue and employee information on economic and social issues and goals.

The Group and each of its companies are looking for the development of every employee and access to training all along the career.

Human resources management procedures are in place to formalise the various processes (recruitment, training, skills management, etc.).

Every employee shall ensure the protection and respect of the confidential nature of all information held in the professional context, unless this transmission is strictly necessary for the fulfilment of his or her mission.

Any communication with the press must be authorised by the General Management.



VII. SOCIAL RELATIONS: CONSULTATIONS AND NEGOTIATION

The Group and each of its companies take into account contextual changes and support these changes through a process of social dialogue, consultation and negotiation with employee representatives.

VIII. HEALTH AND SAFETY AT WORK

The Group and each of its companies ensure that the workplace and its environment meet the requirements of a vision focused on health and safety of people.

Training and information on health and safety at work are carried out, both to ensure regulatory compliance and to ensure that employees are continually aware of the issue. Employees can also propose improvements in working conditions that will be studied for possible inclusion in the action plans.

All employees are jointly responsible for safety at work. They must respect the Quality, Health, Safety and Environment protocols defined by the company.

Particular attention is paid to the well-being of employees, especially regarding social facilities.



IX. ENVIRONMENT

Biscuits Bouvard is committed to making a significant contribution to respect for the environment, in particular through its performance, its economic and social responsibility and a reasonable use of resources combined with the optimisation of its production processes in its facilities in all the countries where Biscuits Bouvard operates.

In the agri-food market, Biscuits Bouvard works to promote and implement high quality standards and industrial norms that comply with European and international legislation.

The Group and each of its companies are committed to promoting the development of international environmental standards. The control of waste, emissions and effluent treatments comply with the legal requirements in place.

The Bouvard Group acts in compliance with the environmental regulations of the countries in which it operates.

The Group provides the information, communication and training required to ensure a good internal understanding of its commitment.



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