



# AFNOR GROUP ETHICS POLICY adopted by the Board of Directors on 17 December 2024

The AFNOR association is vested with a mission to serve the general interest. Together with its subsidiaries, it forms an international group that works to foster sustainable development<sup>1</sup>.

Since 1926, the Group has been designing solutions based on voluntary standards that are the architects of trust and progress. It is focused on its mission of supporting organizations and individuals in spreading this trust. The Group delivers guidance through four areas of expertise, namely standardization, publishing, training and certification.

The AFNOR Group's expertise is aimed at promoting a common language and strengthening trust between economic players in France and abroad, thereby helping build a safer, more prosperous and more supportive world.

Driven by the four core ethical values championed by its employees - Quality, Trust, Responsibility and Teamwork - the AFNOR Group, as a socially responsible company, is committed to demonstrating the highest level of ethical conduct and loyalty in its governance, practices and decisions, which encompasses all its activities.

Such is the purpose of this ethics policy.

## WHO IS CONCERNED BY THE AFNOR GROUP'S ETHICS POLICY?

Published on the AFNOR Group's websites, the ethics policy applies to:

- AFNOR's directors;
- AFNOR Group **employees** in France and abroad, since the policy is appended to the internal regulations of the Group, which is organized as an economic and social union (ESU), and referenced in all employment contracts;
- The AFNOR Group's contractual partners, including its training subcontractors, auditors and controllers, as well as its suppliers, since the ethics policy is referenced in all purchasing agreements.

#### Did you know?

The <u>Sector-Based Standardization Bureaus</u>, which act under AFNOR's delegated authority following approval from the French Ministry of Industry, are subject to the ethical requirements set out in the <u>NF X 50-088</u> standard, the <u>CEN-CENELEC Internal Regulations - Part 1</u>, and <u>ISO/IEC Guide 59:2019</u>. Similarly, the <u>certification bodies appointed by AFNOR</u> to issue the NF mark apply the ethical provisions in the ISO/IEC 17000 series of standards. Experts involved in standardization (commission members, chairpersons, facilitators, delegates and members of European and international working groups, etc.) are subject to their own ethical requirements. In France, these requirements are described<sup>2</sup> in the <u>Vademecum on Standardization</u> as well as in the <u>Rules for French Standardization - Part 1</u>. In Europe, they are defined in the <u>CEN-CENELEC Code of Conduct</u> and the <u>ETSI Code of Conduct</u>, and internationally in the <u>ISO Code of Ethics and Conduct</u> and <u>IEC Code of Conduct</u>.

<sup>1</sup>ISO 26000 defines sustainable development as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development is about integrating the goals of a high quality of life, health and prosperity with social justice and maintaining the earth's capacity to support life in all its diversity. These social, economic and environmental goals are interdependent and mutually reinforcing. Sustainable development can be treated as a way of expressing the broader expectations of society as a whole.

<sup>&</sup>lt;sup>2</sup>The order of priority for the different documents is established in the foreword of the Rules for French Standardization - Part 1, page 5, which lists the various applicable rules in descending order of precedence.

#### AFNOR ETHICS COMMITTEE

The Ethics Committee of AFNOR's Board of Directors, whose composition and missions are enshrined in AFNOR's <u>articles of association</u> and <u>internal regulations</u>, drafted the ethics policy. AFNOR's Board of Directors, executive office and top management, and the statutory bodies of AFNOR's subsidiaries may refer matters to the Ethics Committee whenever necessary.

## WHAT ARE THE OBJECTIVES OF THE AFNOR GROUP'S ETHICS POLICY?

The ethics policy is designed to describe the commitments that the Group has taken to:

- Prevent any situations representing a conflict of interest;
- Prevent all forms of bribery;
- Collect and respond to whistleblower reports;
- Ensure the security of our customers' and partners' information;
- Choose suppliers who share our sustainable values.

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The AFNOR Group's activities are built upon trust. This is the very trust capital that the Group's directors, employees, subcontractors (auditors, trainers, controllers, etc.) and suppliers strive to preserve and reinforce in performing their activities.

Several measures have been taken to limit and control the situations where AFNOR's directors, employees or partners would need to choose between the duties and requirements of their position and their private interests, or where they could be at risk of being both judge and jury, so that the AFNOR Group's independent judgement and objectivity are not impaired when delivering its activities and services.

#### → Special provisions for AFNOR's directors

AFNOR is administered by a <u>Board of Directors with no more than 30 members</u>, who are appointed in such a way that the different interested parties are widely and fairly represented. The Group's governance is organized to prevent all forms of conflicts of interest. Each director has a directors' charter<sup>3</sup> and signs a declaration of interests<sup>3</sup> every year with the aim of preventing and managing any real, potential or apparent conflict that could exist between AFNOR's interests and the director's personal or professional interests.

#### → Special provisions for standardization activities

All new AFNOR Standardization employees, in accordance with <u>French Regulation</u> 2009-697 and the <u>NF X50-088 standard</u> on standardization activities, and in alignment with this policy, are required to sign a declaration of interests<sup>3</sup> upon joining the Group and a commitment<sup>3</sup> to conduct standardization work in an impartial manner.

<sup>3</sup> Strictly internal document

### Did you know?

The NF X 50-088 standard specifies that standardization work is carried out in an impartial manner when no stakeholder is favoured over another.

Impartiality, as far as normative work is concerned, is the ability to take into account the opinions and interests expressed by each of the stakeholders, to explain the latter, to examine each of the contributions without giving preference to or omitting any one, to see to it that the positions of the standardization commission are loyally represented within the European and international bodies.

As part of their onboarding process, AFNOR Standardization employees also receive legal training to help them carry out their activities, with particular emphasis on competition law and how to control the associated risks.

#### Special provisions for training and certification activities

The co-existence of consulting and assessment / certification activities within the Group presents or may be perceived as presenting a risk of a conflict of interest.

This risk is mitigated by complying with the rules that are defined in line with this ethics policy and clarified in a conflict of interest management procedure<sup>4</sup>, which complies with the accreditation requirements in terms of impartiality (ISO 17021, ISO 17024, ISO 17065, etc.).

An analysis<sup>4</sup> into any conflicts of interest is also carried out by each <u>Group certification</u> body, documented, and regularly audited by the relevant accreditation bodies.

Employees at AFNOR Certification, other certification bodies, AFNOR International and the support entities involved in certification processes sign a non-disclosure and impartiality agreement<sup>4</sup>, which may prompt them to withdraw from the activities of a given case if there is a potential conflict of interest.

The same applies to partners, such as auditors and controllers, who sign a code of conduct<sup>4</sup> in which they agree to report any conflict of interest and refrain from accepting an assignment if they have previously advised the customer.

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AFNOR Group employees and partners must carry out their activities in accordance with the provisions of French anti-bribery law and the applicable legal provisions relating to such subject matter in France and the foreign countries where the AFNOR Group operates through its subsidiaries and distributors or, more generally, where it is required to provide services.

The AFNOR Group condemns and prohibits all forms of bribery and corruption.

The AFNOR Group's anti-bribery code of conduct<sup>4</sup> is designed to inform and guide all Group employees and partners on the risks and the prohibited types of behaviour, so that they acquire the right habits and know the applicable procedures to ensure that the Group's activities comply with anti-bribery rules.

This code has been incorporated into an anti-bribery compliance programme<sup>4</sup>, which is inspired by <u>ISO 37001</u>. Employees are bound by the programme through the internal regulations of the AFNOR ESU, while suppliers and distributors are bound by contract.

Business ethics training is also provided for people in positions facing the greatest exposure to the risk of bribery.



<sup>&</sup>lt;sup>4</sup> Strictly internal document



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With the aim of simplifying procedures and improving efficiency, the AFNOR Group has set up a <u>unique whistleblowing system</u> for reporting acts and incidents occurring during the course of professional activities and concerning a breach of the ethics policy or a code of conduct, such as offences (including an unlawful taking of interest, sexual and gender-based violence in the workplace, acts of bribery, favouritism or harassment, etc.), crimes, threats to the public interest, and violations (or an attempted violation) of regulations or legislation.

This system is an essential resource for preventing, addressing and remedying serious incidents that are reported to our Group during the course of professional activities.

The whistleblowing system is available to:

- Internal stakeholders, including AFNOR Group employees, natural persons who are members of the AFNOR association, directors and members of the executive committee;
- External stakeholders, such as former AFNOR Group employees and job applicants, external and occasional employees (temporary employees, interns, etc.), any employee or manager of a company bound by a contract with an AFNOR entity (service provider, customer, etc.) and any employee or manager of a subcontractor engaged by a contractor of an AFNOR entity.



## ENSURE THE SECURITY OF OUR CUSTOMERS' /////////// AND PARTNERS' INFORMATION

Guaranteeing the confidentiality, integrity and availability of the information belonging to our entities, partners and customers is key to building trust. Therefore, an Information Security Policy<sup>5</sup> defines the security rules that all managers and employees within the Group must know and apply.

The information security policy has three clear ambitions:

- Protect information assets at all times and guarantee the necessary conditions for the Group to perform its activities;
- Maintain trust between the Group and its customers, employees and partners:
- Ensure that the AFNOR Group's infrastructures comply with the applicable statutory, regulatory and contractual frameworks.

AFNOR holds <u>ISO/IEC 27001</u> certification, and an IS user policy<sup>5</sup> appended to the ESU's internal regulations provides AFNOR Group employees with the rules for using its IT and communication resources, including AI best practices.



<sup>&</sup>lt;sup>5</sup> Strictly internal document



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The AFNOR Group has set up a sustainable procurement policy<sup>6</sup> that aligns its procurement practices with its values and the principles in the voluntary <u>ISO 20400</u> standard, and which is available to both employees and suppliers.

The aim is to build relationships of trust with our suppliers, while taking account of our sustainable development objectives.

For example, we periodically check that our suppliers are not economically dependent on our Group and that our payment times are honoured, and we provide all companies with access to our purchases without any discrimination in accordance withthe principles of equal treatment of applications.

#### **REVIEWS AND CHECKS**

Ongoing awareness-raising actions are frequently implemented for all stakeholders (employees, directors, accountants, suppliers, partners, etc.) to ensure responsible behaviour and an appropriate response in all circumstances (bribery, fraud, etc.).

In addition, internal or external reviews and checks are regularly carried out to assess whether best practices or specific rules are properly applied and determine their effectiveness, as well as identify any necessary improvements:

- Audits of AFNOR's standardization activities, as part of <u>ISO 9001</u> certification. AFNOR's activities are also regularly evaluated by the <u>Audit and Evaluation</u> Committee (CAE);
- COFRAC accreditation assessments for AFNOR Certification according to <u>ISO/IEC 17021</u>, <u>ISO/IEC 17024</u> and <u>ISO/IEC 17065</u>, for example;
- Certification audit of AFNOR's Information Systems Department according to <u>ISO/IEC 27001</u>.

In addition to these external audits, AFNOR continually monitors its internal control and risk management activities (including the risks of ethical violations), which is reviewed by the General Economic and Financial Control Department and the statutory auditors, and validated by the Board of Directors.

Finally, AFNOR regularly benefits from other external control missions.

#### **HOW TO REPORT A BREACH OF THE ETHICS POLICY?**

In case of doubts or suspicions about a breach of the provisions of this policy, we would advise:

- **Group employees** to contact their direct manager, department manageror any other employee representative body, so that the case can be referred to the Ethics Committee through top management;
- **Group employees or any external parties** to use the whistleblowing system (<u>alerte@afnor.org</u>) to report any actions that are likely to constitute an act of professional misconduct or a breach of the AFNOR Group's ethics policy or codes of conduct.

In the event of an established infringement of the provisions set out in this policy, sanctions may be applied, including disciplinary measures in the case of employees, or termination of contract in the case of business partners.

