



# The Eurofins Group Code of Ethics

All our activities rely on and require the ethical and compliant conduct of our leaders, employees, and partners in all aspects of our company's businesses.

*Message from Eurofins Board of Directors*



**Ethical and compliant behaviour is a core value of our business. Our clients, suppliers, employees and other stakeholders have to be able to rely on absolute integrity from our part. As such, it is non-negotiable. All our activities rely on and require ethical and compliant conduct of our leaders, employees and partners in all aspects of our companies' business.**

*Compliance statement issued by the Board of Directors on 24 October 2019*

## OUR COMMITMENT

Eurofins<sup>1</sup> is committed to conducting business in a responsible and ethical way. Eurofins' mission, vision and values set out the conditions for our long-term success and are core parts of the way we expect everyone involved with the Eurofins Group to conduct themselves. This includes acting ethically, with integrity, and demonstrating professionalism at all times. Our Group's motto 'Testing for Life' illustrates our commitment to use our work and talent for contributing to the health of all and protecting the environment and sustainability.

## HOW THE CODE WORKS

The Eurofins Group Code of Ethics (further referred to as the **"Code of Ethics"** or the **"Code"**) serves as a standing guideline for all people working for, or with, the companies belonging to the Eurofins Group. It is designed to set out a series of ethical conduct principles which support Eurofins' values of Customer Focus, Quality, Competence & Team Spirit and Integrity. It is not intended to be limited to the areas which it addresses specifically and it should be interpreted in accordance with the general principles stated in [Eurofins Values](#).

Leaders<sup>2</sup> and directors of all companies belonging to the Eurofins Group are expected to comply with this Code of Ethics and implement it by adopting formal policies and procedures specific to the company(ies) they are in charge of in line with this Code of Ethics and [Eurofins Values](#), taking into account local legislation and customs, as well as appropriate business practices.

Eurofins expects its leaders, directors and employees (referred to in this Code as **"Eurofins Members"**) and other persons acting for, or on behalf of, any Eurofins Company (referred to in this Code as **"Associates"**) to:

- follow all legal obligations applicable to the company/country in which they are active; and
- behave in accordance with the principles laid out in this Code of Ethics, [Eurofins Values](#), [Eurofins Leadership Charter](#) and related [Group policies](#).

Eurofins leaders and directors must ensure that these obligations and principles are adhered to by all employees and Associates in their area of responsibility and develop policies within the practices and laws of the jurisdictions they fall under to implement the principles laid out in the Eurofins recommendations and policies referred to above. Local Compliance Officers<sup>3</sup> support them in this effort.

We work with our suppliers, service providers and customers to ensure that they are aware of, and whenever possible support, the objectives set out in this Code of Ethics.

We expect Associates working for, or on behalf of, Eurofins to act consistently with these principles. Where this Code of Ethics requires an Associate to behave in a certain manner, appropriate provisions shall be included in the relevant contract.

<sup>1</sup> Eurofins or Eurofins Group or "we" means Eurofins Scientific SE and any entity directly or indirectly controlled by it, each individually referred to as a "Eurofins Company".

<sup>2</sup> The terms leader, director, employee, Eurofins Member, Associate and any other terms designating persons or groups of persons as well as the terms "he" or "she" in this Policy are not meant to specify any gender and are to be read as being strictly non-discriminatory.

<sup>3</sup> A Local Compliance Officer is (i) the Financial Director of the relevant National Service Centre, or (ii) any other individual nominated by the Financial Director of the relevant National Service Centre, or (iii) the Compliance Manager nominated by the Legal Representative of the Eurofins Company concerned, provided in each case that these individuals are approved in writing by the Group Compliance Officer.

## RESPECT FOR OUR CUSTOMERS AND BUSINESS PARTNERS

We are committed to dealing fairly with our customers, suppliers, service providers and competitors.

### CUSTOMERS

We regard mutual trust and confidence between our company and our customers as very important. We require Eurofins Members to strive consistently to deliver high levels of service, surpassing customer expectations, and meeting their changing requirements. Eurofins Members shall personally commit to offering our customers the highest level of quality of services that can be achieved with the technical means and the fees provided by the customer.

### SUPPLIERS AND SERVICE PROVIDERS

We ensure that all of our suppliers and service providers (further jointly referred to in this Code as “suppliers”) are treated fairly and responsibly, in accordance with our agreed terms of trade. All potential suppliers will have a reasonable opportunity to win business with us. We expect that all our suppliers conduct their activities in accordance with the values and principles laid out in this Code of Ethics.

### COMPETITION

Companies in the Eurofins Group aim to compete vigorously with their competitors, but in a fair and ethical way. We strive to ensure that our success is built upon providing excellence and never based on unfair practices such as inappropriately accessing competitors’ confidential information.

Eurofins, its Members and Associates shall comply with national and international competition laws and regulations, such as those relating to pricing strategies, market divisions or abuse of dominant position. We will not undertake any arrangements or practices in violation of applicable competition laws. Eurofins, its Members and Associates will not discuss pricing strategies with competitors, nor undertake any arrangements or practices that may conflict with the laws applicable to the conduct of our business.

We will not accept details of other competitors’ bids during a tender process, unless such information is lawfully available in the public domain or disclosure is permitted by law.

All individuals working for, or on behalf of, a Eurofins Company are expected to adhere to the [Eurofins Group Fair Competition Policy](#) as made available in their Company in the form of local policies.

### CONFLICTS OF INTEREST

Eurofins Members are responsible for avoiding conflicts between their personal interests and the interests of companies forming the Eurofins Group. This includes any situation that could appear to present the potential or risk of a conflict of interest even if such conflict of interest does not actually arise.

A conflict of interest arises when an individual permits the prospect of a personal gain or benefit to improperly influence the manner in which he or she conducts business. Eurofins Members must be free of any interest that could adversely influence their judgment, objectivity or loyalty to Eurofins. Whenever Eurofins Members have, or anticipate, dealings with a business, in which they or a family member or a relative are interested, they need to disclose such dealings to the President or Managing Director of the Eurofins Company that they work for or to a member of the Group Operating Council (GOC) if they are themselves the leaders or directors of a Eurofins Company.

During negotiation of contracts with customers or suppliers, Eurofins Members are prohibited from improperly influencing the terms of a contract with the company for the personal gain of one or several Eurofins Members or their family or relatives.

When engaging an Associate, Eurofins will ensure that no conflict of interest arises between Eurofins and the Associate or between the Associate and any other party with whom the Associate may deal on behalf of Eurofins.



## RESPECT FOR OUR PEOPLE

### FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

We support the four fundamental principles contained within the International Labour Organisation (ILO) Declaration:

- Effective abolition of child labour
- Elimination of discrimination in respect of employment and occupation
- Elimination of all forms of forced or compulsory labour
- Freedom of association and the effective recognition of the right to collective bargaining.

Eurofins will respect freedom of association and the right to collective bargaining.

### EQUALITY

We value all of our people, for their contribution to our business. The relationships with and between them must be respectful, honest, safe and professional.

We recognise achievement and create equal opportunities for all Eurofins Members at all levels of our businesses. In dealing with our Members we act in compliance with national and international requirements and laws.

### DIVERSITY AND NON-DISCRIMINATION

Eurofins promotes diversity and inclusion. Opportunities for advancement will be equal, and not influenced by considerations other than performance and aptitude. Eurofins Members are provided with the opportunity to develop their potential and, where appropriate, to develop their careers further within our group of companies.

We do not tolerate discrimination based on age, gender, race, ethnicity, sexual orientation, religion, disability or any other legally protected status.

### NO BULLYING OR HARASSMENT

All Eurofins Members must be treated with respect and made feel safe within the workplace. Eurofins does not tolerate any form of abuse, harassment or bullying of its people in the course of their engagement. Eurofins will investigate any claims of harassment, bullying or other forms of abuse.

### OCCUPATIONAL HEALTH AND SAFETY

Health and safety is a natural priority and a core element of all of our activities. As such, we strive to:

- Protect the physical health of all of our Members while in the workplace, by seeking to prevent accidents and work-related ill health;
- Consult with our Members on matters affecting their health and safety;
- Maintain a safe workplace and equipment/systems across all of our operations and provide information, training and supervision in safe working methods and procedures;
- Ensure that our laboratories and offices are comprehensively evaluated and tested and meet applicable legal and regulatory requirements;
- Ensure that emergency procedures are in place in cases of fire or other major incidents and that Eurofins Members are properly trained to follow/execute them; and
- Ensure that all Eurofins Members report all health and safety related concerns or incidents, including accidents or injuries, to the President or Managing Director of the Eurofins Company they work for.

All individuals working for, or on behalf of, a Eurofins Company are expected to adhere to the [Eurofins Group Equal Opportunities and Fair Employment Policy](#) and the [Eurofins Group Health and Safety Policy](#) as made available in their Company in the form of local policies.



## RESPECT FOR OTHERS

### UNIVERSAL DECLARATION OF HUMAN RIGHTS

Eurofins supports human rights in line with the stipulations contained within the Universal Declaration of Human Rights, and we remain committed to upholding these principles through the conduct of our activities throughout the world.

### CHILD LABOUR, MODERN SLAVERY AND HUMAN TRAFFICKING

All child labour laws are adhered to, and we have a zero tolerance approach to any form of slavery or human trafficking.

### POLITICAL INVOLVEMENT

Eurofins values political debate and Eurofins Members and Associates are free to engage in political activity in their private capacity. However, as a company Eurofins does not (directly or indirectly) participate in party politics, nor do we provide financial support to political parties or politicians.

### CONFIDENTIALITY

Eurofins respects confidentiality. Those duties may arise by law, pursuant to an agreement or because of the relevant circumstances.

Eurofins Members and Associates must never keep or use non-public information,<sup>4</sup> unless either:

- it is specifically protected by a confidentiality agreement, in which case the terms of the relevant agreement must be observed;
- it has been provided or legally obtained with the intention that it be used by the Eurofins Members concerned; or
- it is Eurofins proprietary information that they need to know or use.

Eurofins Members and Associates are expected to ensure immediate destruction or return to its legitimate owner of any physical or electronic piece of information that is not addressed to them or that they do not need to know or use. Wherever possible this will take place before they have even been read or opened.

Eurofins Members and Associates must avoid forwarding or disclosing confidential information, unless they are duly authorised to do so.

We will not make improper attempts to acquire competitor trade secrets or other confidential information.

### INTELLECTUAL PROPERTY

Eurofins respects the intellectual property rights of third parties. Inappropriate use of others' intellectual property may expose Eurofins and its Members to criminal and civil fines and penalties. Therefore, Eurofins Members should seek appropriate legal advice and formal authorisation from their direct supervisors before they solicit, accept or use proprietary information from others. The appropriate licences should be acquired if developing a product or service that uses intellectual property not belonging to Eurofins.

### DATA PROTECTION AND PRIVACY

Eurofins is committed to treating information with respect and protecting personal data from unauthorised disclosure. We respect privacy by collecting, using, retaining, sharing and disclosing personal data fairly, transparently, securely and in accordance with legal requirements. We share information on a strict need-to-know basis only. We shall protect information about, or belonging to, our customers, suppliers, Members, Associates or our business and, unless strictly necessary for the conduct of our business, we shall not transmit such data outside of the Eurofins Company which acquired it or beyond the Members of that Company who absolutely need it to perform their work.

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<sup>4</sup> In this context, "information" refers to any data, application or document, whether physical or electronic and whether it comes from a Eurofins Company, customer, competitor or any other third party.

## RESPECT FOR OUR WORLD

### COMMUNITIES

We always strive to ensure that our relationships with our neighbours and local communities are conducted sensitively and with mutual respect. We aim to promote sharing of the economic value created by our activities, through the conduct of our community relationships.

We respect the different cultures, traditions, laws, and employment practices of the communities we do business in. We will share common goals in this matter and are committed to good company values and ethical behaviour.

### ENVIRONMENT

We strive to prevent or otherwise minimise, mitigate and remediate harmful effects of our operations on the environment. We promote, encourage and prioritise re-use and re-cycling methods throughout our business, as well as conservation of energy.

We comply with all laws designed to protect the environment such as those governing storage and disposal of chemicals and other materials.

### SUSTAINABILITY

We strive to contribute positively to global sustainability through the operations of our business and the conduct of our relationships with all of our stakeholders.

## RESPECT FOR OUR GROUP OF COMPANIES

### SAFEGUARDING COMPANY ASSETS AND FUNDS

Eurofins Members and Associates are expected to utilise company assets and facilities with care and frugality and solely for their intended purpose. Appropriation of any Eurofins' funds or property by its Members for anything other than official company business is strictly prohibited unless prior written authorisation has been granted by the President or Managing Director of the Eurofins Company they work for or as permitted by Eurofins policies.

Eurofins Members and Associates shall seek to protect Eurofins' property (whether tangible or intangible) from loss, damage, misuse, theft, fraud, embezzlement or destruction.

Every Eurofins Member should seek appropriate legal advice and formal authorisation from their President or Managing Director of the Eurofins Company they work for before he or she lets others use or have access to Eurofins' proprietary information.

### KEEPING RECORDS AND ACCOUNTS

All records, accounts and financial statements must be completed in a timely manner and accurately and fairly reflect the nature of the transactions recorded. All records must conform to both the applicable legal and accepted accounting principles and Eurofins' internal policies.

### CONTRACTUAL ARRANGEMENTS

Eurofins Members who are authorised to enter into an agreement for the supply of products or services to Eurofins must obtain an appropriate number of bids so as to ensure the best possible quality and quantity of goods and services for the most reasonable price is obtained by the contracting Eurofins Company.



## INDEPENDENCE OF INDIVIDUAL COMPANIES

Eurofins is structured as a network of independent companies and values the freedom of action and entrepreneurship of the leader of each of the companies belonging to the Group. Eurofins Members shall never commit a company other than their own nor act as if their company formed one with another Eurofins Company. Eurofins leaders and directors that have responsibility over multiple Eurofins Companies or an activity that covers a whole country shall behave only as shareholders towards these companies and never give direct orders to these companies' leaders, directors or employees. National or Group Service Centres are at the service of Eurofins Companies and, unless otherwise agreed as part of specific services contracts (for example regarding IT security), their leaders, directors or employees shall give no binding instructions to the leaders, directors or employees of operating companies. The terms "Corporate" or "Headquarter" shall not be used at Eurofins to refer to common or shared services, only the term "Service Centre" (National or Group).

## EXTERNAL COMMUNICATION

Eurofins Members and Associates must not speak on behalf of Eurofins, discuss or disclose any information regarding Eurofins or issue any public statements on behalf of Eurofins to: the media; financial analysts; current or potential investors; or other recipients without specific written authorisation.

Eurofins Members and Associates must not express personal opinions with regards to religion, politics or any other objectionable content on Eurofins branded letterhead, in emails or in any other context where such opinions or materials could appear to be attributable to Eurofins.

Eurofins Members and Associates must not post on any social media sites comments that may be attributed to Eurofins. They may use social media in their personal capacity provided that any such communication or activity does not violate any law or otherwise disparage or insult Eurofins, its customers, suppliers or competitors. Eurofins Members and Associates may only publish or share documents related to Eurofins or its business activities, clients or technology that have been already published on Eurofins' website or duly approved for public communication by authorised directors.

## RESPECT FOR THE LAW

### BRIBERY AND CORRUPTION

We are resolutely opposed to bribery and corruption regardless of its form.

Sales of the company's products or services, and purchases of goods or services from suppliers, shall be made solely on the basis of price, quality, performance, value, and for the benefit of Eurofins. Business decisions, sales or purchases must never be made as a result of inducements from third parties such as: gifts; money; entertainment; or favours in any other form.

Gifts or entertainment may only be offered to, or accepted from, third parties if they:

- are consistent with usual business practice and applicable laws in the relevant territory;
- are modest in value; and
- cannot be interpreted as a form of inducement.

All individuals working for, or on behalf of, a Eurofins Company are expected to adhere to the [Eurofins Group Anti-Bribery Policy](#) as made available in their Company in the form of local policies.

## INSIDER TRADING

Eurofins Members and Associates who are in possession of inside or privileged information are prohibited, for as long as this information has not been made public lawfully, from entering into (or recommending others to enter into) any transaction involving the financial instruments of Eurofins to which the inside or privileged information relates. They must not disclose such information to third parties.

Inside information is information of a precise nature which has not yet been made public and which relates directly or indirectly to one or more issuers, or to one or more financial instruments, and which if it were made public would be





likely to have a significant effect on the prices of the financial instruments in question or on the price of related derivative financial instruments.

All individuals working for, or on behalf of, a Eurofins Company are expected to adhere to the Eurofins Group Insider Dealing Policy in its current version available on the Group internal Document Management System (DMS).

## **FACILITATION OF TAX EVASION**

Eurofins has zero tolerance towards the criminal facilitation of tax evasion and we are committed to rejecting the facilitation of tax evasion.

Involvement in facilitation of tax evasion may expose Eurofins and the person facilitating the evasion to penalties and criminal prosecution. Tax evasion will also damage our reputation and the confidence of our customers, suppliers and business partners.

## **TRADE COMPLIANCE AND EXPORT CONTROLS**

Any transactions or import, export and re-export activities must be conducted in full compliance with all applicable import and export control laws, regulations and policies as well as, governmental trade restrictions and international sanctions.

Consequences of violating trade controls can be severe for Eurofins and for individuals involved and can result in disciplinary action, substantial fines and/or imprisonment.

## **SEEKING FURTHER GUIDANCE**

### **RELATED GROUP POLICIES**

The principles and guidelines in this Code of Ethics are further detailed in related Group policies, which should always be read in conjunction with this Code of Ethics. The full list of such policies can be found via the following link:

<https://www.eurofins.com/about-us/corporate-sustainability/governance/eurofins-core-compliance-documents/>

### **COMPLIANCE QUERIES**

Individuals are encouraged to communicate any questions about this Code of Ethics and its application to their direct supervisors or the relevant compliance officer or Eurofins legal department. If you are unsure who to speak to, or if you would prefer to communicate questions beyond the Company that you work for, please contact Compliance Helpline on the Company's intranet site (DMS). For more information on whistleblowing, please see the Company's intranet site (DMS) and the Company's website: [Whistleblowing Contact](#).

## **WHISTLEBLOWING**

For concerns relating to misconduct at work, breaches of this Code of Ethics or other illegal activities within the Eurofins Group, Eurofins Members and Associates are encouraged to raise concerns in the knowledge that their action will be viewed positively and that they will be protected from victimisation which may result from their reporting of these facts.

Actual or suspected criminal offences, failure to comply with legal obligations, serious health and safety risks, modification or falsification of test results, serious breaches of authorised quality requirements on the basis of which a Eurofins Company is accredited or authorised, damage to the environment, financial and procedural irregularities as well as deliberate suppression or concealment of any of these should be reported to the [Whistleblowing Point of Contact](#).

On behalf of the Eurofins Board of Directors

Dr. Gilles Martin  
Chief Executive Officer

