



The Eurofins Group Supplier Code of Ethics

Our customers expect us to be exemplary in our integrity in rendering our services and carrying out our business, and so untainted integrity is one of our most important assets.

Message from Eurofins CEO, Dr. Gilles Martin



Integrity is at the heart of the business of all companies belonging to the Eurofins Group.¹ Our customers expect us to be exemplary in our integrity in rendering our services and carrying out our business, and so untainted integrity is one of our most important assets.

We at Eurofins take pride that integrity, impartiality and independence form an integral and unalienable part of our Group culture. Eurofins has always been taking a strong and clear stance against any unethical behaviour. With this Eurofins Supplier Code of Ethics, which is based upon the principles laid out in the Eurofins Group Code of Ethics, we are providing advice and recommendations on how our suppliers may identify and avoid improper behaviour in their day-to-day decisions when carrying out business for Eurofins.

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TO WHOM THIS CODE APPLIES

This Eurofins Group Supplier Code of Ethics (further referred to as “**Code**”) is applicable to all suppliers and service providers, including their employees² and agents (jointly referred to in this Code as “**Suppliers**”), who provide goods or services to Eurofins Companies. Eurofins’ direct Suppliers must ensure that any sub-contractors, agents or third parties engaged by them in support of Eurofins’ business also comply with this Code.

HOW THE CODE WORKS

This Code supports Eurofins Companies in upholding the highest ethical and professional standards in their business dealings and relationships with Suppliers wherever they operate. It is designed to set out a series of conduct requirements, principles and practices which promotes Eurofins’ Values of Customer Focus, Quality, Competence & Team Spirit and Integrity.

Eurofins is committed to working with Suppliers who are aligned to these same values.

This Code formalises the requirements, principles and practices (“**Minimum Standards**”) that any Supplier doing business with any Eurofins Company is expected to comply with, taking into account local legislation and customs, as well as appropriate business practices. Eurofins Suppliers should also ensure that these Minimum Standards are adhered to by all their employees and other persons acting for, or on behalf of, them.

We recognise that our Suppliers operate in different cultural and legal environments. Therefore, this Code outlines only the Minimum Standards that Eurofins Suppliers are expected to adhere to. At the same time, we strongly encourage Suppliers to exceed these Minimum Standards, and to promote best practice and improvement throughout their own supply chain and to comply with all legal obligations on them wherever they operate.

This Code forms part of the Eurofins General Terms and Conditions of Purchase.

GOOD BUSINESS PRACTICES

COMMITMENT TO ETHICAL CONDUCT

Eurofins expects its Suppliers not to engage in any improper or illegal conduct in the course of acting for, or on behalf of, Eurofins as well as maintain confidentiality about their business dealings with Eurofins.

Eurofins Suppliers must have in place systems and procedures that are designed to assist them in upholding high standards of integrity, honesty and ethics in all their activities.

¹ 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”.

² The terms leader, director, employee, Eurofins Member, Associate, Intermediary and any other terms designating persons or groups of persons as well as the terms “he” or “she” in this Code are not meant to specify any gender and are to be read as being strictly non-discriminatory.



CONFLICTS OF INTEREST

Eurofins Suppliers must avoid any interaction with any Eurofins leader, director or employee (referred to in this Code as “**Eurofins Members**”) or any other person acting for, or on behalf of, any Eurofins Company (referred to in this Code as “**Associates**”) that may conflict or appear to conflict with that Eurofins Member or Associate acting in the best interests of Eurofins. For example, Suppliers must not employ or otherwise make payments to any Eurofins Member or Associate during the course of any actual or contemplated transaction between the Supplier and Eurofins (other than pursuant to the contract).

If a Supplier employee has a family relation to any Eurofins Member or Associate, or if a Supplier has any other relationship with a Eurofins Member or Associate that might represent a conflict of interest, the Supplier must disclose this fact to Eurofins in writing.

COMPETITION

Eurofins Companies 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 anti-competitive agreements or practices such as inappropriately accessing competitors’ confidential information. We expect our Suppliers to adopt the same approach. As such Eurofins Suppliers are expected to comply with all international and national competition laws and regulations across the jurisdictions in which they interact with Eurofins Companies.

Eurofins Suppliers must not participate in any anti-competitive agreements or practices (including, but not limited to, cartels, pricing, resale pricing, market sharing, bid rigging, terms of trading, purchase or supply and joint ventures) which may be considered to be a breach of competition laws or an abuse of a dominant or monopoly market position or may harm Eurofins or its customers.

Suppliers must not share with Eurofins Companies, Members or Associates any non-public information they have about Eurofins’ competitors.

BRIBERY AND CORRUPTION

Eurofins takes a zero tolerance approach to any form of bribery and corruption, and we expect our Suppliers to adopt the same approach. Eurofins Suppliers must never give, offer, promise, request, agree to receive, authorise receipt or accept a bribe in connection with Eurofins business or any other business they conduct.

Eurofins Suppliers are required to familiarise themselves, and act in compliance with all international and national laws and regulations applicable to their activities, including, but not limited to, the Foreign Corrupt Practices Act 1977 (“**FCPA**”) in the U.S., the Bribery Act 2010 (the “**UK Bribery Act**”) and the Modern Slavery Act 2015 in the UK, the French Criminal Code as amended and supplemented by the Law No 2016-1691 of 9 December 2016 on transparency, the fight against corruption and modernisation of economic life (“**Loi Sapin II**”).

Suppliers should be aware of the local laws relating to gifts and hospitality that apply in the jurisdictions in which they interact with Eurofins, its Members or Associates.

Suppliers should also be aware that Eurofins Members and Associates are required to comply with the provisions on gifts and hospitality contained in the [Eurofins Group Anti-Bribery Policy](#). The policy provides that gifts may only be accepted if they are promotional or advertising articles of very modest value (and in any case not exceeding EUR 5 per item, per instance, and EUR 20 in aggregate for all such gifts received by a beneficiary per year or lower limits as may be set by Eurofins locally).

Suppliers must not interact with a Eurofins Member in such a way as to put him or her at risk of breaching the [Eurofins Group Anti-Bribery Policy](#).



GOOD FINANCE PRACTICES

ACCOUNTS, BOOKS AND RECORDS

It is a requirement that Eurofins Suppliers maintain accurate records, accounts and financial statements that fairly reflect the nature of the transactions recorded. All records must be completed in a timely manner and conform to all applicable laws, regulations, and accepted accounting principles.

Eurofins Suppliers must cooperate with all third party/supplier audits as carried out by Eurofins from time to time. Eurofins Suppliers must cooperate in a timely manner and produce any documentation or records requested by Eurofins.

FRAUD, MONEY LAUNDERING AND TAX EVASION

Eurofins Suppliers must not engage or assist in any activity whatsoever relating to fraud, money laundering or tax evasion in connection with Eurofins business or any other business they conduct.

The fundamental elements of fraud are deception and dishonesty. Examples of prohibited activities include (non-exhaustive list):

- stealing from Eurofins, a customer or any third party;
- any kind of misappropriation of property;
- any kind of misreporting of time or costs;
- inflation of invoices;
- engaging or assisting money laundering.

Eurofins has a policy of only making payments to Suppliers if there is a valid legal basis to do so.

Eurofins Suppliers must have a zero tolerance approach to criminal facilitation of tax evasion, and commit to rejecting any facilitation of tax evasion.

TRADE COMPLIANCE, SANCTIONS AND EXPORT CONTROLS

Eurofins Suppliers must conduct all transactions or import, export and re-export activities in full compliance with all applicable international and national import and export control laws, regulations, policies and governmental trade restrictions.

It is Eurofins policy to comply with sanctions laws (“**Sanctions**”) implemented in the countries in which Eurofins Companies operate, including, but not limited to, those administered and enforced by the European Union and its Member States, the UK, the U.S., and China. Eurofins expects its Suppliers to adopt the same approach.

Consequences of violating trade controls and Sanctions can be severe for Eurofins and the Suppliers involved, and can result in disciplinary actions, substantial civil and criminal fines and penalties, including imprisonment of individuals, as well as termination of contracts, exclusion from tenders, debarment from government contracts and other consequences.

KNOW YOUR CUSTOMER (“KYC”) REQUIREMENTS

Suppliers must cooperate with Eurofins in respect of Eurofins’ Know Your Customer (“**KYC**”) checks and third-party due diligence. In addition, Eurofins Suppliers must be able to demonstrate, at Eurofins’ request, that they have carried out reasonable and proportionate KYC checks on any sub-contractors whom they engage.

FAIR TREATMENT AND EQUAL OPPORTUNITY

FUNDAMENTAL PRINCIPLES AND RIGHTS AT WORK

Eurofins supports the four fundamental principles contained within the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work:



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

We expect our Suppliers to adhere to the same principles.

DIVERSITY AND INCLUSION

Eurofins promotes diversity and inclusion, and we expect our Suppliers to adopt the same approach. Employment - including recruitment, payment, benefits, promotion, training, termination and retirement - must be based on ability and merit, not on personal characteristics, and equal employment opportunity must be provided to all regardless of age, gender identity, race, ethnicity, sexual orientation, religion, nationality, disability or any other characteristic.

HARASSMENT AND BULLYING

Eurofins is committed to promoting a work environment that is free from discrimination, harassment, bullying or any other forms of abuse. Harassment (both overt and subtle) is a form of misconduct that is demeaning to another person. Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Eurofins Suppliers are expected to strictly oppose any form of harassment, bullying or any other forms of abuse.

SLAVERY, HUMAN TRAFFICKING AND 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. We expect our Suppliers to adopt the same approach.

Eurofins Suppliers must have in place adequate procedures to ensure they are not directly or indirectly, through their supply chain, involved in any slavery or human trafficking or any other form of human rights abuse.

Eurofins Suppliers must comply with all local laws relating to forced and child labour, wages and benefits, and freedom of movement and association. Where such local laws are of a lower standard than the ILO principles and standards (where applicable), Eurofins Suppliers must comply with the ILO principles and standards as basic requirements.

HEALTH AND SAFETY

Eurofins is committed to ensuring a safe, hazard-free environment for its people and all those on its premises and to complying with all applicable health and safety laws and regulations. We expect our Suppliers to adopt the same approach.

Eurofins Suppliers must ensure they have appropriate health and safety policies and procedures in place in relation to all aspects of their work and that adequate training, monitoring and auditing is in place in order to ensure compliance with those policies and procedures.

ENVIRONMENT AND SUSTAINABILITY

Eurofins Companies strive to prevent or otherwise minimise, mitigate and remediate harmful effects of their operations on the environment, and we expect our Suppliers to do the same.

Eurofins Suppliers must comply with all applicable environmental laws and regulations and seek to operate in a manner which maximises sustainability of resources and limits, to the extent possible, their impact on the natural world.



DATA PROTECTION AND PRIVACY

Eurofins recognises its duty to respect personal information, ensure it is protected and handled correctly and only used for the purposes for which it is provided. As part of this obligation, we require that our Suppliers manage personal information in accordance with all applicable laws and regulations, and in accordance with the following key principles:

- personal information will be processed in a fair, lawful and transparent manner;
- personal information will be obtained for specified purposes and will not be processed in any manner incompatible with those purposes, except where permitted by law;
- personal information will be adequate, relevant and not excessive in relation to the purpose(s) for which it is processed;
- personal information will be accurate and, where necessary, kept up to date;
- personal information will not be kept for longer than is necessary;
- appropriate measures will be taken to safeguard personal information against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

INTELLECTUAL PROPERTY

Eurofins respects the intellectual property rights of third parties. Inappropriate use of others' intellectual property may expose Eurofins to criminal and civil fines and penalties.

Eurofins Suppliers should protect and treat with respect Eurofins' intellectual property rights and those of third parties.

Suppliers should seek formal authorisation from Eurofins before they solicit, accept or use proprietary information belonging to Eurofins. The appropriate licences should be acquired if the Supplier is developing for Eurofins a product or service that uses intellectual property not belonging to the Supplier or to Eurofins.

WHISTLEBLOWING

For serious or sensitive concerns about any form of malpractice or wrongdoing, including breaches of this Code or any other Eurofins' policy or other illegal activities within the Eurofins Group, Suppliers are encouraged to contact the relevant Eurofins compliance officer or legal department or the Whistleblowing Point of Contact ("**Whistleblowing Contact**") in the knowledge that their action will be viewed positively and that they will be protected against any detrimental treatment by Eurofins which may result from their reporting of these facts.

The following are examples of serious or sensitive concerns about malpractice and wrongdoings, whether actual or soundly suspected, which should be notified to Eurofins immediately upon becoming aware (non-exhaustive list):

- criminal activity;
- failure to comply with legal obligations;
- miscarriage of justice;
- danger health and safety;
- damage to the environment;
- financial malpractice or impropriety or fraud;
- modification or falsification of test results;
- serious breaches of authorised quality requirements or test procedures on the basis of which a Eurofins Company is accredited or authorised;
- attempts to conceal any of the above.

For more information on whistleblowing, please see the Eurofins website: [Whistleblowing Contact](#) as well as [the Eurofins Group Whistleblowing Guidelines](#).

On behalf of the Eurofins Group Operating Council

Dr. Gilles Martin
Chief Executive Officer



OUR VISION

Our long-term aspiration

To be the Global Leader in Testing for Life.

OUR MISSION

Why we are here - the cause/purpose of our business

To contribute to a safer and healthier world by providing our customers with innovative and high quality laboratory, research and advisory services whilst creating opportunities for our employees and generating sustainable shareholder value.

OUR VALUES

What we stand for/what is important for us

Customer focus

- Delivering customer satisfaction by listening to and exceeding customer expectations
- Adding value for our customers through our services
- Seeking innovative solutions to help our customers achieve their goals

Quality

- Delivering quality in all our work; providing accurate results on time
- Using the best appropriate technology and methods
- Seeking to improve or change our processes for the better

Competence and Team Spirit

- Employing a team of talented and competent staff
- Investing in training and creating good career opportunities
- Recognising and encouraging outstanding performance

Integrity

- Behaving ethically in all our business and financial activities
- Demonstrating respect towards our customers and our staff
- Operating responsible environmental policies

