Ecovadis
Code of Ethics 2017
# Table of Contents

1. Why code of ethics? .................................................. 3
2. Scope of application .............................................. 4
3. Implementation ..................................................... 4
4. Quality of csr rating ................................................ 5
5. Transparency of csr rating ....................................... 5
6. Integrity of csr rating ............................................... 5
7. Corruption & bribery ............................................... 6
8. Conflict of interest .................................................. 6
9. Anti-competitive practices ........................................ 7
10. Diversity, discrimination & harassment ...................... 7
11. Intellectual property, confidentiality & information security ....................................................... 8
12. Stakeholder Relations ............................................ 9
13. Non-exhaustiveness & respect for the law .................. 10
14. Speak up & disciplinary action ................................ 10
15. Non-retaliation assurance ....................................... 11
16. Contacts .......................................................... 11
1) WHY CODE OF ETHICS?

EcoVadis was founded with the belief that businesses can make a huge positive impact on improving environmental and social practices globally, through their supply chains. We envision a world where businesses are measured and rewarded not only by their financial performance but also by their sustainability. A world in which businesses understand their impacts around the globe and grow ethically, without causing any undue harm. We are confident that, with the implementation of this Code, we will continue our growth as a company committed to corporate social responsibility, while improving our performance and exceeding our customer’s expectations.

Thank you for your commitment,

Pierre-Francois Thaler       Frederic Trinel       Sylvain Guyoton
2| SCOPE OF APPLICATION

Our code of ethics establishes expectations for employee conduct. As a ratings company, our business ethics focus is on quality, transparency and integrity. This code builds on these values by detailing the expected behavior as a member of EcoVadis’ global team. All employees and contractors working for EcoVadis are expected to fully comply with this Code.

3| IMPLEMENTATION

The latest version of this code is published on the EcoVadis website (www.ecovadis.com) and on the EcoVadis Intranet. An Ethics Officer has been appointed by the Executive Committee. To support the Ethics Officer in EcoVadis’ different locations, Ethics Referents have also been appointed.

All new EcoVadis employees must sign the acknowledgement of the Code. While twice a year, all employees are asked to confirm their compliance with the Code during their performance appraisal.

Senior managers and the Ethics Officer may require any member of the EcoVadis team to undertake training on ethics and compliance with this code, without delays.

Reporting on the implementation of this Code is included in the EcoVadis annual Global Compact Communication on Progress.
4 QUALITY OF CSR RATING

The EcoVadis rating methodology evolves with the fast-changing corporate social responsibility field. Our clients rely on our ratings to make business decisions; therefore, we are committed to delivering a product that meets and exceeds client expectations. Anything less than this commitment carries significant reputational risks for our company. In order to maintain the quality standards and guarantee a steady level of customer satisfaction, we are committed to quality at all levels of the company services. EcoVadis maintains a quality management system compliant with ISO 9001 (“Quality Management Systems – Requirements”) and certified ISO 27001 (“Information Security Management Systems – Requirements”). Our Quality and Information Security mission, vision and objectives are communicated/disseminated to employees through the Quality Policy and in the Information Security Policy—each of which are reviewed annually.

5 TRANSPARENCY OF CSR RATING

For EcoVadis, ratings methodology is directly linked to quality, which requires us to balance transparency, intellectual property protection, and the needs of our clients carefully. As part of our commitment to transparency, we share the details of our rating process on a need-to-know basis, primarily to engage stakeholders and provide continuous support to clients after scorecards are published.

6 INTEGRITY OF CSR RATING

As a rating company, we face unique risks that could compromise the integrity of our work if not managed appropriately. We recognize these risks and are committed to maintaining effective processes designed to ensure objectivity. The following principles are essential to safeguarding the integrity in our rating system and protecting our reputation:

• Integrity guidelines for ratings analysis
• Information firewalls between Evaluation Services and other departments.
7| CORRUPTION & BRIBERY

Corruption and bribery are the abuse of entrusted power for private gain, through either implicit or explicit offers or promises of undue advantage in order to obtain or retain business or other improper advantage. Accepting gifts or favors from a business contact can cloud employee judgment when making decisions on behalf of EcoVadis. Thus we expect employees and business partners to act in EcoVadis’ best interest by following our Code of Ethics and Gifts and Entertainment Policy. In order to ensure that employee respect these principles, EcoVadis implemented the following measures:

• Anti-corruption training for all employees.
• Guidance on expense reporting through our Gifts & Entertainment Policy.

8| CONFLICT OF INTEREST

A conflict of interest arises when employees’ personal interests or activities interfere with their ability to act in the best interests of the Company. It is EcoVadis’ policy that personal relationships must not result in preferential treatment for suppliers, clients or any other external stakeholders. We recognize that employees have personal relationships with suppliers, clients, and other external stakeholders. In case of potential conflict of interest, employees must disclose this to their business unit managers. The following measures were implemented to address potential conflicts of interest:

• Business ethics training for all employees.
• A hiring process that recognizes that relationships can influence the judgment of merit.
• Employee remuneration structure that enables independency of supplier analysis.
9 | ANTI-COMPETITIVE PRACTICES

Most suppliers we analyze are required to do so by their buyers, and frequently pay for the evaluation using their own resources. EcoVadis is committed to fair-market integrity by respecting all applicable antitrust laws and not exploiting our position in the CSR ratings industry through coercive price-fixing. We implement fair sales and marketing practices when dealing with clients and suppliers to ensure that our market position is not perceived as predatory. Internal measures to prevent anticompetitive practices include:

- Sales & Marketing (SAM) training regarding membership pricing and process
- The establishment of a committee decision-making body that decides when to allow price adjustments

10 | DIVERSITY, DISCRIMINATION & HARASSMENT

EcoVadis’ diverse workforce is a valuable asset because it provides us with a wide range of perspectives necessary to interact with global stakeholders. In order to retain this asset, we are committed to hiring, training, promoting and compensating employees based solely on merit, without consideration of race, color, religion, gender identity, national origin, disability, veteran status, genetic characteristics, political opinion, trade union affiliation, pregnancy, sexual orientation or physical appearance. We are also committed to providing a work environment free of harassment. Our commitment to providing a culture free of discrimination and harassment is enhanced by the following measures:

- Training of all employee on diversity, anti-discrimination and anti-harassment
- Secure communication channel for employees to seek advice or voice concerns on discrimination and harassment through an Ethics reporting procedure. Confidentiality and non-retaliation are guaranteed.
INTELLECTUAL PROPERTY, CONFIDENTIALITY & INFORMATION SECURITY

Due to the technical nature of our product, we rely heavily on IT security and employee engagement to ensure that data is properly secured. Our reliance on IT requires a firm commitment to managing information security risks. For this purpose, we implemented a comprehensive Information Security Management System certified to ISO27001 standard. It enables us to systematically operate and maintain information security in our business processes and services, and to determine and apply the necessary security measures based on our risk assessment. We have a security incident management process in place to detect and remediate security incidents and future risks. Penetration tests are performed on a regular basis in order to evaluate our IT infrastructure and identify vulnerability and improvement areas.

We recognize that there are limitations when relying solely on policies and IT measures; therefore, we also implement the following support measures:

- Information Security training.
- Information firewall that limits access to each department determined by what is necessary.
12 | STAKeHOLDeR RElATIoNS

EcoVadis strives to promote the principles of corporate social responsibility globally. As part of this commitment, we engage with a wide variety of organizations and professionals to keep up-to-date with the fast-changing world of CSR, and invest time in community causes that we support. It is our responsibility to clarify our relationship with our stakeholders, which is as follows:

360 sources
As part of our assessment, we incorporate information (when available) from qualified sources regarding news related to the company's CSR performance. We do not receive any financial compensation from the sources we use. To safeguard our independence, we do not promote on behalf of EcoVadis the actions of any organization, including those that we use as 360 sources.

Trade associations
We engage with trade associations on a regular basis to discuss CSR issues and strategies relevant to their sectors. This cooperation has no impact on commercial aspects or assessments scores for the association's members.

Companies
We often engage with companies on CSR in order to learn more about their internal organizations, processes and needs. These companies can eventually be our clients or be assessed as suppliers. Our collaboration with them on CSR issues has no impact on commercial aspects or assessments scores.

Community involvement
As part of our commitment to CSR, we invest time and resources into community projects. The recipient organizations or groups are selected carefully and their names can be communicated upon request.

Employee representatives
Employee representatives have an important role in management/labor relations and in the resolution of potential disputes. We encourage dialog and consultation with employee representatives and ensure they can carry out their duties and responsibilities effectively.
**13| NON-EXHAUSTIVENESS & RESPECT FOR THE LAW**

The principles in this code are not meant to be exhaustive, but rather consultative. It does not aim to address each and every situation that the company or individual employees may face. If and when a situation, not addressed in the code, arises, the code should be used as a guidance tool to enable informed judgment. When in doubt about the ethical nature of a situation, consult an Ethics Officer (see contact at the end of this document).

A lack of knowledge will not be considered as an acceptable excuse. If any provision of this code violates the regulations that apply to you, employees must comply with the Law and report any situations of this nature to an Ethics Officer.

**14| SPEAK UP & DISCIPLINARY ACTION**

When ethical compliance concerns or doubts arise, employees must report them to a senior manager and/or the Ethics Officer.

If an employee, in good-faith, reasonably believes that another employee and/or EcoVadis has engaged in illegal conduct, has failed to comply with this code and/or EcoVadis values, the employee shall promptly raise the issue to a Senior Manager and/or the Ethics Officer. Reports will be managed in a timely and confidential manner via an independent investigation to establish full details related to the situation.

Reports should be factual and contain as much specific information as possible to allow the Ethics Officer to adequately investigate the report. To contact the Ethics Officer, please send an email to ethics@ecovadis.com.

Disciplinary actions will be considered in the event an employee of EcoVadis fails to comply with the Code of Ethics. More information regarding disciplinary measures is available in regional Employee Handbooks.
15 NON-RETALIATION ASSURANCE

EcoVadis prohibits retaliation against anyone who raises an ethical concern or cooperates in a company investigation. The Company will not permit any sanction against employees for raising concerns in good faith, regardless of the findings or disciplinary results.

16 CONTACTS

Ethics officer

Bettina Grabmayr ethics@ecovadis.com

Regional Ethics Referents

Vidushi Bonomaully, Nadisha Gangoo, Bettina Grabmayr

Ethics Advisor

Julia Moshkin, Michael Smith

Senior Managers

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Versions

Version 1.0 - March 2011.
Version 3.0 – June 2017