



# ETHICS

Responsible  
*and committed!*

12 RESPONSIBLE CONSUMPTION AND PRODUCTION



• Ensure rational use of natural resources

Questions of Ethics and Compliance have been a priority for Bouygues Construction for over a decade. They are an essential part of the bond of trust we maintain with our customers, employees, investors and shareholders, and, more generally, all our partners. This trust is underpinned by our adoption, in 2006, of rules of conduct that are applicable throughout our operations. Collated in our "Practical Guide to the Implementation of the Code of Ethics and Compliance Programmes", these rules are enshrined at the highest level of the company.

The Group's Code of Ethics calls on each manager and employee to respect the standards of professional ethics set out in the "principles of action" guidelines which must in all circumstances govern the behaviour of managers and employees worldwide.

Because the sharing of established rules is essential to the success of our Ethics and Compliance process, raising awareness, training and involving employees are the focus of particular efforts:

- Group employees (apart from master craftsmen) are trained via our digital module on ethics, "Fair Deal";
- Each Director and Departmental Manager personally pledges to respect the Group's Compliance regulations by signing a letter of commitment.



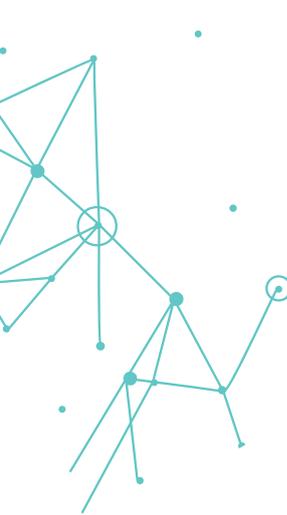
## 2020 AMBITION

100 %

of employees to follow to the Fair Deal online training module

100 %

of directors and departmental managers personally committed to our code of Ethics



## OUR SOLUTIONS

### 1 - FAIR DEAL

Fair Deal is a serious game for online training that involves employees in real-life situations. It is up to each of them to help Fair Dealers make decisions that are in line with the Group's Ethics and Compliance policies. Each situation concludes by giving advice to employees and referring them to the relevant internal memo.

*"As a construction company operating in more than 80 countries, where business practices can sometimes be very different, the implementation of shared rules has allowed us to anticipate regulatory changes, strengthen our rules and procedures, and develop a real culture of ethics and compliance among our 56,000 employees."*

**Jean-Marc Kiviatkowski**

Deputy General Director, with responsibility for legal affairs, insurance, auditing, internal control and compliance.

### 2 - COMPLIANCE TOOLS

The Code of Ethics, risk mapping, third-party management, compliance programmes (anti-corruption, competition, conflict of interest, stock market information), restrictions on commercial intermediation, sponsorship & philanthropy policy, gifts and invitations policy, reporting and handling of alerts - a complete and comprehensive set of tools enforces the relevant rules throughout the Group.

For example, the "PROBITY" digital tool is designed to collect declarations of gifts and invitations received or given, as well as actions representing the interests of each employee.



### 3 - ETHICS IN PRACTICE

Available to each employee, the "Practical Guide to the Implementation of the Code and Compliance Programmes" provides extra details and explains, clearly and concretely, how the principles contained in the Bouygues Group Code of Ethics and Compliance Programmes should be applied.

