



GROUPE

ETHICS CHARTER





For more than 60 years, the BRL Group has been involved in the development of the Occitanie region, working alongside and serving local players. It also offers innovative solutions, in France and abroad, to meet the challenges of mitigating and adapting to climate change in the water, environment and biodiversity sectors, drawing on all its business lines:

- Concessionaire and project owner for the Occitanie Region's Regional Water Network.
- Consulting engineer, project manager and design office.
- Manager of major hydraulic structures and operator of raw water, drinking water and wastewater services.
- Designer and maintenance provider for green spaces, nurseryman of ornamental plants.

More than 77% owned by the public sector (Region, Départements, local authorities), the Group is developing its regional development mission for the Occitanie region, by carrying out the AQUA DOMITIA programme (€220m investment) to transfer water from the Rhône river to the Hérault and Aude coasts. In addition to its activities in France, the Group is pursuing its international growth, mainly in African countries facing the effects of climate change. Convinced that a company must constantly adapt to its environment, we are developing our business model around today's major transformations: the ecological and energy transitions, as well as the digital revolution, which influence each of our businesses and the future of our regions.

The BRL Group employs 800 people and has sales of €80 million, 20% of which are generated internationally.

Our Group organises its processes to ensure the long-term trust of its shareholders, customers and employees, based on a foundation of fundamental values: a sense of public service, solidarity, fairness, respect for the environment and human relations. We are also the bearers of an ethic that commits us unconditionally: respect for laws and regulations, integrity and honouring commitments, as well as constant concern for the health and safety of our employees, partners, customers and service providers.

These values and ethics are reflected in our governance, internal organisation and operating methods. Through our behaviour and actions, we are all custodians and actors of these values on a daily basis, which defines our commitment to sustainable development and corporate social responsibility.

Wherever the BRL Group operates, it is committed to promoting these values, respecting the legislation specific to each country and the rules of conduct laid down by international organisations, and encouraging employees and partners to adhere to them.

Our management teams ensure that our employees carry out their duties in accordance with these unifying values, which are essential to the long-term future of our Group. They encourage them to behave in the best interests of our stakeholders by developing balanced relationships and providing a transparent account of their professional activities. Adherence to these values and ethical principles is shared with the members of our Board of Directors and our Governance Committees, who ensure that they are properly integrated into the Group's strategy and its deployment.

This Code of Ethics sets out the principles and compliance requirements that each employee must observe in the performance of its duties.



Jean-François BLANCHET
Chief Executive Officer of the BRL Group

January 2022



«*BEHAVE WELL, ACT WELL*»
«*THINK GLOBALLY, ACT LOCALLY*».
«*BEING TRANSPARENT AND ACCOUNTABLE*»

Since it was founded in 1955, BRL has regularly adapted its organisation to meet the challenges of its territory. In 1993, it set up a subsidiary for its main business lines to promote their development and better meet the expectations of its customers.

Today, the **BRL Group** is a multi-skilled, integrated player that offers innovative solutions to **climate change mitigation and adaptation** objectives in the water, environment, biodiversity and regional development sectors, in France and abroad.

In consultation with its stakeholders, the BRL Group develops sustainable solutions that are efficient for the regions and profitable for the greatest number. To achieve this, it mobilises its know-how in the

land, river, coastal and maritime sectors, with skills organised around **4 major business lines**:

- **Concessionaire and Investor-Project Owner** of the Regional Hydraulic Network on behalf of the Occitanie/Pyrénées-Méditerranée Region.
- **Consulting engineer**, design office and project manager.
- **Manager of major hydraulic structures and operator** of raw water, drinking water and wastewater services.
- **Designer and manager of landscaped areas and nurseryman-producer** of ornamental plants, shrubs and trees.

These values and our responsibility to our stakeholders are reflected in our governance, internal operating methods and day-to-day actions.

More than 77%-owned by the public sector (Regions, Departments, Metropolitan Areas), the Groupe BRL defines itself as a player who listens, committed to fundamental values:

- solidarity ;
- fairness ;
- respect for people, the environment and biodiversity.

It therefore has a responsibility towards its stakeholders:

- respecting commitments, laws and regulations;
- a sense of public service;
- promoting the general interest ;
- concern for the health and safety of employees and third parties affected by its activities.

DAY-TO-DAY PRINCIPLES

Trust and moral integrity

The individual actions of each person, in the context of his or her duties, have an influence on the reputation of the BRL Group, but also on the preservation of its reputation, its safety and that of its employees.

Everyone has a duty to **behave in a caring and exemplary** manner in the performance of its duties.

Discretion and confidentiality

The BRL Group endeavours to ensure that all its stakeholders (internal and external) **respect discretion and confidentiality** in the use of data, information, know-how, intellectual and industrial property rights and business secrets relating to its activities.

All employees undertake to respect this obligation of discretion and confidentiality in the performance of their duties and outside their professional activities.

Compliance with laws and regulations

The BRL Group ensures compliance with all legal and regulatory provisions, and prohibits any act contrary thereto.

Procedures are in place to detect legal risks and ensure compliance with laws and regulations. Regular legal monitoring is carried out to this end.

The Legal and Corporate Social Responsibility Department (DJRSE) defines the frameworks to be applied and implemented by the Company and Operational Departments and Services. The Audit and Internal Control Department (DACI) ensures compliance with the applicable frameworks and the deployment of preventive measures.

A culture of integrity and honesty

The BRL Group actively fights corruption and all types of fraud and prohibits any direct or indirect act relating thereto.

Through its compliance policy and procedures, it ensures that not only business relationships but also interpersonal relations and professional practices are conducted with honesty and integrity.

The compliance officer appointed by each company's management ensures that the compliance path driven by the BRL Group is properly applied.

Sustainable development and CSR commitment

The BRL Group is at the heart of the challenges of sustainable development, with a *raison d'être* of **territorial and societal utility**, respectful of the environment and the long-term interests of populations.

Faced with a world facing major changes and upheavals (climate disruption, regional and global population growth, digital transformation, artificial intelligence, health crises, new social expectations, emergence of a new world), the BRL Group has considered the **changes it needs to make to its businesses**, its skills and the organisation of its activities.

The **CAP 2025** strategy defines the framework for the Group's transformation, with the aim of contributing to the sustainable development of the region, with a resolute focus on the ecological and energy transition.

The BRL Group's **Corporate Social Responsibility and Sustainable Development (CSR-SD) policy** sets out the strategic priorities of CAP 2025 around **4 pillars (social, environmental, economic and solidarity, territory and culture)** by integrating **the 17 Sustainable Development Goals of the United Nations Agenda 2030**.

The pillars are described in the BRL Group's Sustainable Development and Corporate Social Responsibility policy available on the BRL Group website - CSR / Sustainable Development section.

An ethical company

The BRL Group's **CAP 2025** strategy, the result of a process of reflection shared with employees, management and the Board of Directors, constitutes a genuine commitment to individual and collective corporate responsibility, supported by a resilient approach to crises with a **"learning culture"** (continuous learning to develop and adjust skills) in order to adapt to a rapidly changing world. In this way, it contributes to a vision of the future based on ethics, collaboration and the quest to **minimise the negative impacts** and **maximise the positive impacts** of its activities.



THE BRL GROUP'S STRATEGIC
PRIORITIES ARE BASED ON
3 GUIDELINES:

A social focus

The BRL Group has put in place a social policy aimed at promoting health in the workplace, equal treatment, career and skills management and "working better together".

"The BRL Group does not tolerate any act of discrimination, harassment, violence or intimidation. The BRL Group does not tolerate any act of discrimination, harassment, violence or intimidation and strongly condemns such practices.

An environmental focus

The BRL Group is an attentive player in the ecological and energy transitions, transforming its model to increase its resilience and accelerate its ability to adapt to environmental, climatic and societal changes. This orientation brings together the various innovative environmental actions carried out by the Group's companies, which support the implementation of various environmental projects.

An economic focus

BALANCED BUSINESS RELATIONSHIPS:

The BRL Group endeavours to identify, within the Group's strategic areas of activity, those based on innovation factors that stand out from the competition, with possible leverage effects in terms of internal and external job creation. This is based on balanced business relationships between the Group and its partners, service providers and suppliers. It is in line with these guidelines that the Group fights against breaches of honesty and has set up appropriate risk management systems within its companies.

RESPONSIBLE PURCHASING:

The BRL Group strives to reduce the environmental impact of its purchases and to strengthen the Group's social and societal contribution. To this end, it shares and disseminates its values with its suppliers and service providers in order to develop a shared vision of a responsible purchasing policy that respects human and children's rights, local and global socio-economic balances (fair trade and solidarity), health (prevention of health risks, working conditions for employees) and the environment (prevention of pollution, waste, pollution of natural resources) and the environment (preventing pollution, environmental risks and the degradation of resources), reducing the ecological footprint, contributing to the fight against climate change and developing a circular economy.



FAIR PRACTICES

The BRL Group implements measures to combat all breaches of probity and all forms of corruption. behaviour of both its employees and its economic partners.

To this end, each Group company implements a Code of Conduct drawn up in compliance with this Code of Ethics.

THE ALERT PROCEDURE

Every employee is involved in risk prevention.

Also, and in accordance with the law on transparency, the fight against corruption and the modernisation of economic life (known as the Sapin 2 Law) of 9 December 2016, the BRL Group has set up a whistleblower collection system for each Group company.

The main purpose of these whistleblowing systems is to strengthen the means for employees to report behaviour that could lead to a serious breach of a law or regulation, an offence or a crime.

The full operation of this system is detailed in the document "Information note on the whistleblower system" appended to the Internal Regulations and available on the BRL Group intranet portal.

Each employee must read, understand and strictly comply with this Charter.

Any contrary behaviour that could damage the reputation of the BRL Group and affect its activities would make the perpetrator liable to compensate for the damages in application of the Code of Conduct and the internal regulations of the Group company concerned.



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