

# VIGILANCE HANDBOOK

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*GBH strives to promote gender equality.  
However, to simplify writing and make it easier to read,  
This Code of Conduct avoids repetition in job titles  
by choosing the most commonly practiced gender.*

# GBH

LET'S NURTURE THE ENTREPRENEURIAL SPIRIT...

# TABLE OF CONTENTS

<b>PREAMBLE</b>	<b>3</b>
<b>A. RISK MAPPING PRESENTATION</b>	<b>4</b>
1. HUMAN RIGHTS & BASIC FREEDOMS	4
2. HEALTH - SAFETY & THE ENVIRONMENT	5
<b>B. REGULAR UPDATE OF THE RISK MAPPING PRESENTATION</b>	<b>8</b>
1. HUMAN RIGHTS & BASIC FREEDOMS	8
2. HEALTH - SAFETY & THE ENVIRONMENT	8
3. EVALUATION OF SUPPLIERS & PROVIDERS	8
<b>C. ACTIONS FOR IMPROVEMENT &amp; RISK CONTROL</b>	<b>9</b>
1. COMMITMENTS TOWARDS HUMAN RIGHTS & BASIC FREEDOMS	9
2. COMMITMENTS FOR HEALTH, SAFETY & THE ENVIRONMENT	10
<b>D. WARNING MECHANISM &amp; COMPILATION OF REPORTS</b>	<b>12</b>
1. ALERT ACTIVATION OR REPORT	12
2. TREATMENT OF ALERTS & REPORTS	12
3. PROTECTION OF THE WHISTLE-BLOWER	13
<b>E. FOLLOW-UP OF IMPROVEMENT MEASURES &amp; EFFECTIVENESS MEASURES</b>	<b>14</b>
1. FOLLOW-UP OF COMMITMENTS TOWARDS HUMAN RIGHTS & BASIC FREEDOMS	14
2. IMPROVEMENT MANAGEMENT & MANAGEMENT OF SAFETY & ENVIRONMENT PERFORMANCE	14
3. LABEL HSE GBH	15

# Preamble

According to law n° 2017-399 voted March 27, 2017 concerning the duty of care of parent companies and ordering companies, GBH undertook the elaboration of its vigilance plan through the consolidation of the data of all its subsidiaries.

GBH Vigilance plan integrates the principles and instructions issued from:

- the International Labour Organization conventions,
- the ten principles of the United Nations Global Compact,
- the 1948 Universal Declaration of Human Rights,
- and the 2016/679 (EU) Regulation from the European Parliament and from the Council of April 27, 2016 concerning the protection of private individuals regarding the treatment of personal data and the free flow of personal data called DPR.

The present Vigilance Handbook from GBH consists in 5 chapters corresponding to the 5 duties imposed in law n° 2017-399 from March 27, 2017.

# A. Risk mapping presentation

One of the main principles of the so-called Vigilance law, is based on the realization of a risk mapping presentation according to the 3 following topics:

- Human Rights & Basic Freedoms,
- Health & Safety of people,
- Environment.

This Risk Mapping Presentation consists in the identification, the evaluation and the ranking of the risks identified for GBH and all its branches.

## 1. HUMAN RIGHTS & BASIC FREEDOMS

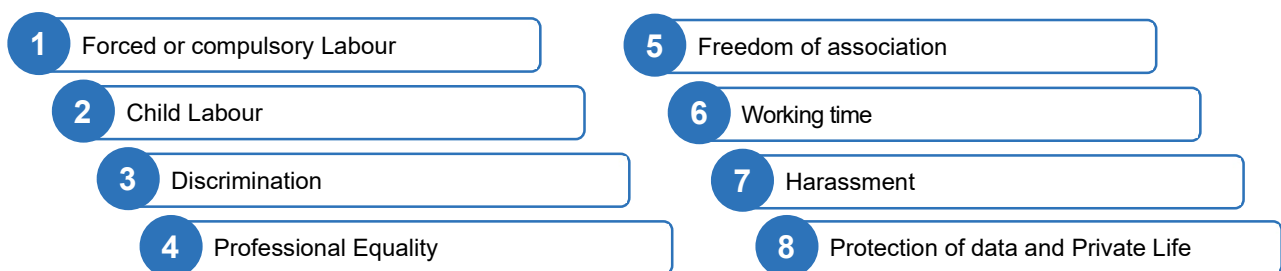
### METHOD

The risk mapping presentation was established based on:

- The United Nations Guidelines dealing with businesses and Human Rights;
- The fundamental Conventions of the International Labour Organisation, (ILO);
- The laws, principles, standards and national and international regulations applicable in all the countries where GBH and its branches operate (direct activities or via its trade relations) and which are applicable to them.

### SYNTHESIS OF THE RESULTS

8 serious \* risks of serious harm towards Human Rights and Basic Freedoms have thus been identified:



*\* No hierarchy between these risks has been put in place voluntarily- All these risks must be dealt with and fought against with the same level of priority within GBH and its branches.*

## 2. HEALTH - SAFETY & THE ENVIRONMENT

### METHOD

The Risk Mapping Presentation was established from the data produced by the Evaluations of Professional Risks (Single Documents) & by the Environnement Analysis from the different branches of the Group.

A common methodology was used for risk scoring and their ranking.

Scoring of Criticality (C) (residual risk after considering the prevention and protection measures) lays on 3 criteria:

- 1. Seriousness (S):** this criterion allows to measure the importance of the impact in case a risk occurs.
- 2. Occurrence (O):** this criterion defines the probability for the risk to happen.
- 3. Limitation (L):** this criterion characterizes the efficiency of the measures taken to limit the consequences of the impact in case a risk happens.

SERIOUSNESS		
	HUMAN BEINGS	THE ENVIRONMENT
10	<ul style="list-style-type: none"> <li>Fatal accident</li> <li>Occupational fatal disease</li> </ul>	Irrevocable effect
7	<ul style="list-style-type: none"> <li>Serious accident (<i>partial or complete disability...</i>)</li> <li>Proven and systematic occupational disease</li> </ul>	Impact out of site, reversible
3	<ul style="list-style-type: none"> <li>Accident with reversible damage (<i>with or without sick leave...</i>)</li> <li>Possibility of foreseen occupational disease (limited or « randomized » impact)</li> </ul>	Limited effect to the site, reversible
1	<ul style="list-style-type: none"> <li>Low human damage (pain, <i>without care...</i>)</li> </ul>	No impact

Concerning this risk mapping presentation, we mainly concentrated on the risks creating a major impact that is to say with a level of **Seriousness of 7 or 10**.

	OCCURRENCE	LIMITATION
10	<ul style="list-style-type: none"> <li>High probability of occurrence <i>Risk already produced in the same conditions (equal organization, equal means...)</i></li> </ul>	No countermeasure
7	<ul style="list-style-type: none"> <li>Average probability of occurrence <i>Risk already produced in different conditions Never produced, but high probability that the problem occurs</i></li> </ul>	Underperforming countermeasure
3	<ul style="list-style-type: none"> <li>Low probability of occurrence <i>Never produced but remains likely</i></li> </ul>	Quite efficient countermeasure
1	<ul style="list-style-type: none"> <li>Never occurred and unlikely to occur</li> </ul>	100% efficient countermeasure

$$\text{Criticality} = S \times O \times L$$



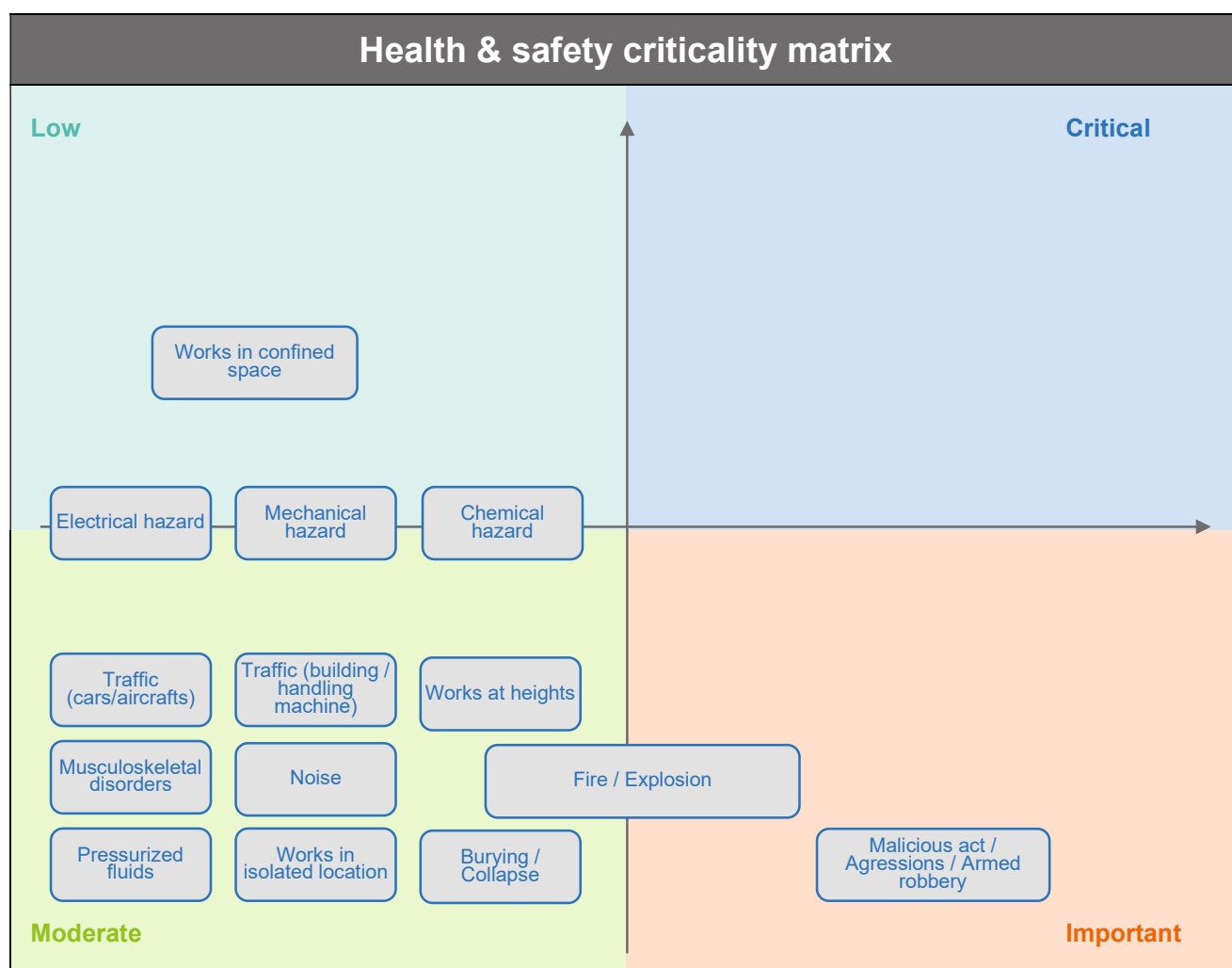
Criticality: Global Level of Risk	
1 to 49	Low
63 to 100	Moderate
147 to 300	Important
343 to 1 000	Serious

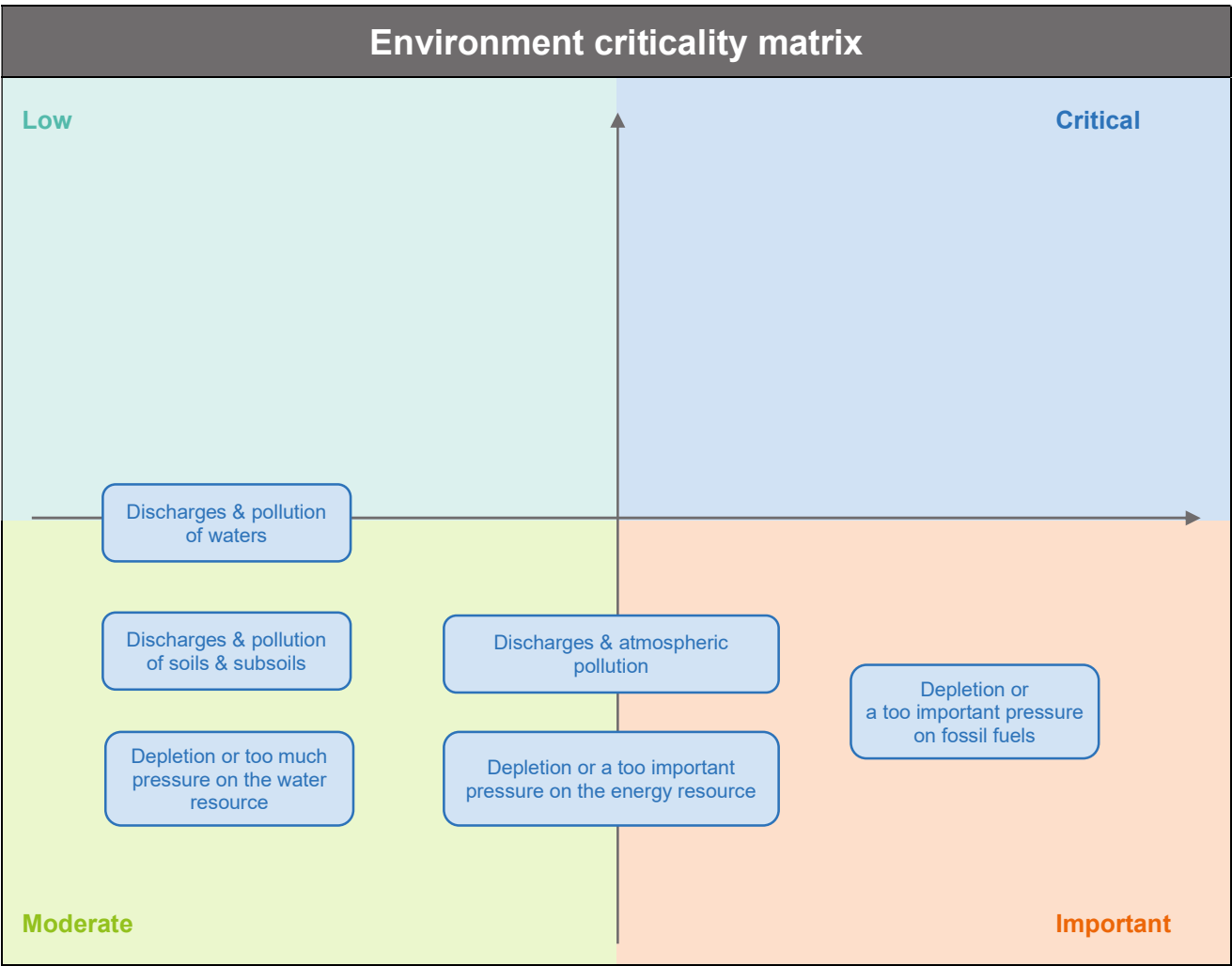
The risks identified concern as well the risks generated by the activities of the branches of GBH as those created by the subcontractors working in the branches of the Group.

## SYNTHESIS OF THE RESULTS ON HEALTH-SAFETY & THE ENVIRONMENT:

The results are presented in Criticality thematic Matrices.

*Nb: All the details are available in the source file « Safety and Environment Risks Analysis ».*





# B. Regular update of the risk mapping presentation

In order to ensure a regular update and a regular evaluation of the risks, GBH chose a collaborative voluntary and constructive approach with its branches and subcontractors.

Each year, each branch from the Group ensures that the necessary information for this update is routed up.

## 1. HUMAN RIGHTS & BASIC FREEDOMS

Each year, all the reference material related to Human Rights and Basic Freedoms (United Nations Guiding Principles related to companies and Human Rights, The International Labour Organization conventions and the existing international and national regulations) is analysed again by the Human Resources Department for the Group in order to update, if needed, the list of identified risks.

## 2. HEALTH - SAFETY & THE ENVIRONMENT

The Risks linked to the operational activities of the branches of the Group are routed up towards the Head of EHS & QSA for the Group through the Evaluations of Professional Risks (Single Documents) & the Environment Analysis revealed by each branch.

The data related to subcontracting activities are, as for them, yearly updated through the realization of Prevention Plans by each of the branches. The evolutions are directly integrated in the Risk Analysis of each branch and are therefore compiled by the Head of Safety & Environment Department for the Group yearly.

## 3. EVALUATION OF SUPPLIERS & PROVIDERS

Each year, the GBH Suppliers & Providers Charter is sent to all the suppliers and providers of GBH and its branches.

The Covenant of integrity attached, this Charter must be sent back to GBH or the relevant branch, dated and signed by the supplier or the provider.

This Covenant of integrity aims at guaranteeing the commitment and the acceptance of the supplier or provider to the Ethic Principles of GBH detailed in the Suppliers & Providers Charter from GBH and in the Code of Conduct from GBH.

The Code of Conduct as well as the GBH Supplier & Provider Charter are made available and for free consultation on <https://www.gbh.fr/en/charte-ethique>.



# C. Actions for improvement & risk control

## 1. COMMITMENTS TOWARDS HUMAN RIGHTS & BASIC FREEDOMS

At all times, all collaborators from GBH and its branches are committed towards:

### 1. THE ELIMINATION OF ANY FORM OF FORCED OR COMPULSORY LABOUR

Referring to the definition of forced labour in Convention n° 29 of the ILO, forced labour is defined as being « all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily »

Thus, all forms of work done under a physical constraint or a threat is strictly forbidden.

### 2. ABOLITION OF CHILD WORK

GBH and all its branches have decided to set the minimum age for employment at 16, that is to say a minimum age superior to the one required by the Conventions n°182 of the ILO. Likely, night work and dangerous works are forbidden for collaborators under 18.

### 3. NON-DISCRIMINATION

Discrimination linked to the sex, the disability, the family situation, sexual orientations, the age, political & philosophical opinions, religious convictions, trade-union activities or linked to ethnic, social, cultural or national origins is not permitted.

Discrimination because of pregnancy is also forbidden.

### 4. PROFESSIONAL EQUALITY

GBH as well as all its branches are committed to the respect of Professional Equality Women/ Men by ensuring a balanced and mixed representation in all the jobs and functions within the Group and its branches through a recruitment policy, an egalitarian career and wage management policy.

### 5. FREEDOM OF ASSOCIATION

The Freedom of association and the employees' right for collective negotiations must be respected.

The Representatives of the employees must be elected without interference from the employer. They must have access to the working areas within the limits of safety and/or potential confidentiality restrictions.

There shall not be discrimination towards employees having trade-union activities.

In the countries and territories where the Freedom of Association and the right for collective negotiation are limited or forbidden, GBH hopes for the development of other types of expression and dialogue with the employees allowing them to express their potential preoccupations.

### 6. COMPLIANCE WITH THE WORKING TIME

GBH and all its branches determine a working time complying with the national local laws and with the ILO Conventions, by always applying the one which offers the best protection in terms of health, safety and well-being of the employees.

Broadly speaking and particularly because of an increased risk of work accident, the working time (including extra hours) must comply with the applicable regulations in the territory involved and the employees must have at least 1 day off every 7 days, or 2 consecutive days off every 14 days.

## 7. PROHIBITION OF ALL FORMS OF HARASSMENT

GBH and all its branches forbid all forms of moral harassment and sexual harassment.

## 8. DATA PROTECTION AND THE RESPECT OF THE PRIVATE LIFE OF EMPLOYEES

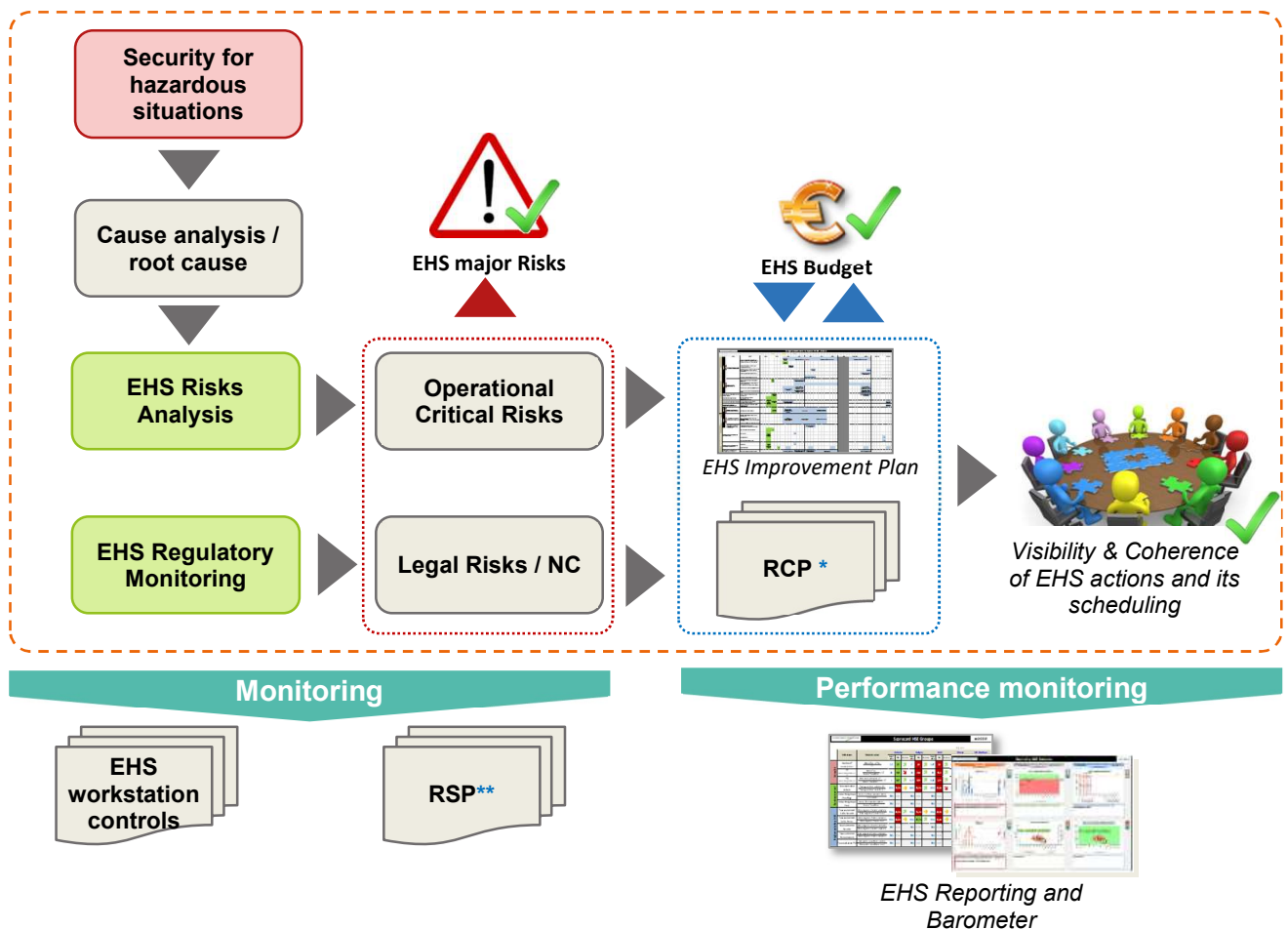
The right for respect of private life of each employee must be respected within GBH and all its branches. In order to guarantee this, GBH and all its branches have deployed all necessary and required actions by the General Data Protection Regulation (GDPR).

The only restrictions which might be brought to this right must be made strictly necessary for the proper functioning and success of the company and must be proportional to the stakes.

# 2. COMMITMENTS FOR HEALTH, SAFETY & THE ENVIRONMENT

## EHS IMPROVEMENT PLANS

To ensure the risks control on Health – Safety & the Environment, each branch determines each year a EHS improvement plan as well as a Regulatory Compliance Plan according to the following logic:



\* RCP: Regulatory Compliance Plan

\*\* RSP: Regulatory Surveillance Plan

Therefore, each branch controls its improvement through a yearly EHS Improvement Plan and a Regulatory Compliance Plan allowing both the monitoring of their operational risks as much as their legal risks.

## GBH EHS CHARTER– « LET’S NURTURE THE WISH TO BE RESPONSIBLE »



Fully aware of the stakes and its responsibilities in this area, GBH has decided to establish by the end of 2018 a EHS Charter in which the Group is committed, with all its branches, to ensure the health and safety of its collaborators, to preserve the environment and respect the EHS regulations.

This Charter reinforces the daily actions led for many years by GBH in favour of the prevention of risks, for the health of its employees and in favour of the reduction of the environmental impact of its activities.

In this respect, GBH wishes to pursue its important role as an actor for sustainable development in all the territories where it is implanted, in France as well as internationally through 3 basic Commitments:

1. Health & Safety of our collaborators
  - A daily preoccupation
2. Preservation of the Environment & Eco-responsibility
  - A societal & economic necessity
3. Respect of the existing EHS regulation
  - A highlight

As early as 2019, after the deployment of the EHS Charter towards the branches of the Group, each branch, each managing direction and each collaborator was asked to act as a responsible and committed actor in this ongoing EHS process of improvement.



## GBH EHS EXCELLENCE BASELINE

In order to reinforce its control over Safety & Environment subjects, an internal EHS excellence baseline for the group was written in 2018 by the Head of Safety & Environment for the Group.

This baseline of good practices creates a set of norms (as much from an organizational as from an operational point of view) which will be deployed within the branches of the Group to aim at excellency in the fields of EHS.

# D. Warning mechanism & compilation of reports

GBH constantly encourages a climate of dialogue and trust as much with all its collaborators as with its external stakeholders but also with its suppliers. To do so, different warning mechanisms and reports of non-respect of the obligations have been put in place.

## 1. ALERT ACTIVATION OR REPORT

Alerts must be directly routed up towards the Head of Ethics for the Group either directly by e-mail or postal mail.



### HEAD OF ETHICS FOR THE GROUP

✉ : [ethics@gbh.fr](mailto:ethics@gbh.fr)  
📄 : GBH - C/O Head of Ethics for the Group  
Acajou – BP 423  
97292 Le Lamentin Cedex 2 Martinique

For the persons wishing to make a report in writing and wanting to remain anonymous, a specific and multilingual internet site is available 24 hours a day, 7 days a week: <https://ethicsgbh.whispli.com/accueil>.

In order to ensure an appropriate and proportionate treatment, each alert shall be fully detailed and motivated.

## 2. TREATMENT OF ALERTS & REPORTS

Only facts, data and information objectively explained, directly linked to the areas in the scope of the alert mechanism and strictly necessary for the checking operations will be considered.

Any fact out of the scope of the alert mechanism will be destroyed without delay by the Head of Ethics for the Group. As an exception, such elements might be re-routed towards the relevant persons of the hierarchy within the company involved if the vital interest of the company or the physical or moral integrity of the employees is at stake.

In case of serious or repeated breach, an Audit could be launched by the Head of Ethics for the Group. The possible investigations led by the Head of Ethics for the Group lay on the presumption of good faith of his interlocutors.

If, after this investigation process, the Head of Ethics for the Group decides to follow up an alert, the persons involved are primarily informed. In this case, the Head of Ethics for the Group sends a report to the Executive Management along with all the original documents.

The potential outcome complies with the legal provisions, rules and proceedings of the Group after consultation and approval of the Group Ethic Committee.

The Head of Ethics for the Group cannot forward to anybody the contents of the requests or alerts which have been notified without primarily hearing the persons accused who have in this situation a sufficient period to give explanations and defend themselves.

If serious facts necessitate to file disciplinary or legal proceedings, they will be held by strictly respecting the rights of the persons involved, the internal rules and proceedings.

In all cases, the persons accused will be heard beforehand by the Head of Ethics for the Group. The persons accused will be able to acquaint themselves and receive a copy of all the elements concerning them which will be put at the disposal of the Head of Ethics for the Group.

### **3. PROTECTION OF THE WHISTLE-BLOWER**

The identity of the collaborators who will use this mechanism, as well as the identity of the persons accused in the alert are treated as confidential information.

The information exchanged and collected during the interviews or through the mails with the Head of Ethics for the Group go along with a privacy guarantee, especially regarding the management and the personal environment of the interested parties.

The identity of the whistle-blower shall be divulged only to the judicial authorities or with their consent. The identity of the person accused after a report shall be divulged only to the judicial authority or only when the alert is established.

The use of the alert mechanism remains optional. No action or sanction shall be taken against a collaborator who would refuse to use this mechanism.

Likely, the use of the alert mechanism bona fide, even if the facts would turn out to be false or would not lead to any pursuit, would not result in an action or sanction towards the whistle-blower. Conversely, an abusive use of the alert mechanism can expose its author to possible sanctions or pursuits.

# E. Follow-up of improvement measures & effectiveness measures

## 1. FOLLOW-UP OF COMMITMENTS TOWARDS HUMAN RIGHTS & BASIC FREEDOMS

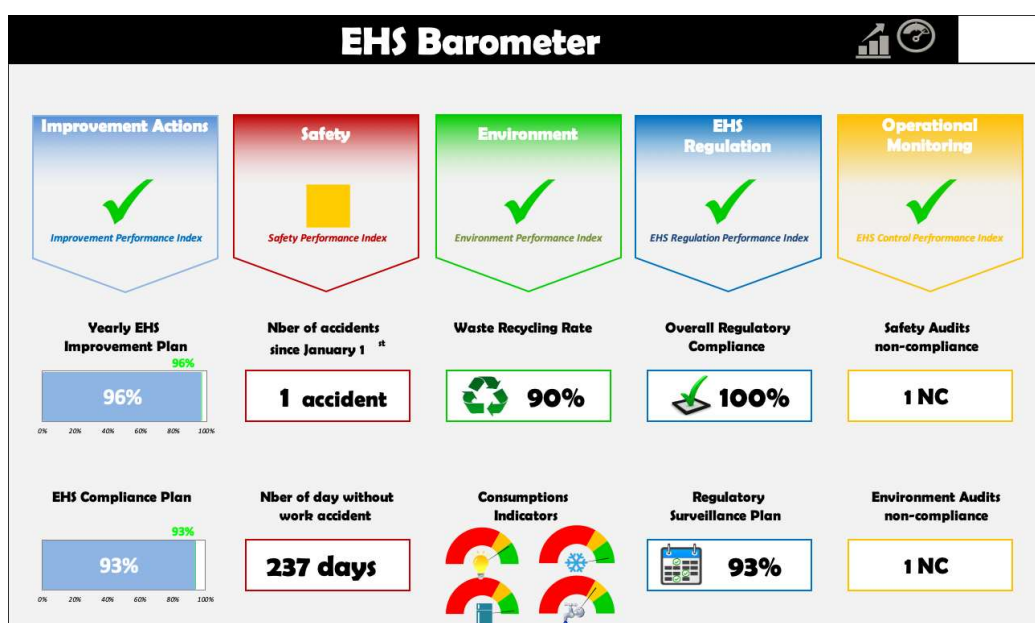
In order to guarantee the respect of the commitments in terms of respect of Human Rights & Basic Freedoms, the Human Resources Departments (local ones and within the Group) regularly follow different indicators through the social reports of the subsidiaries of GBH (ex : the age pyramids, the women/men ratio, the rate of disabled persons, the distribution by types of work contracts and by types of time schedules...).

Meanwhile, an annual report of all the alerts and reporting which might have been routed up to the Head of Ethics for the Group in connection with the Human Rights & Basic Freedoms is realized and analysed in collaboration with the Human Resources Department for the Group.

## 2. IMPROVEMENT MANAGEMENT & MANAGEMENT OF SAFETY & ENVIRONMENT PERFORMANCE

In order to define the guidelines of the EHS policy for the Group and to measure the efficiency of the improvement actions taken, GBH is undergoing the development of a new system with a EHS Barometer (launch as early as January 2019).

This tool allows to compile and consolidate qualitatively and quantitatively the data about Safety & the Environment of the subsidiaries through different performance indicators in connection with the stakes of health, safety & environment of the branches and of the Group.



Each month, these indicators are routed up by each branch towards the Head of Safety & Environment for the Group. The data are then analysed and compiled per territory and per core business before release towards the Executive Management of GBH.

### 3. LABEL HSE GBH

Along with the release of GBH EHS Charter and the launch of the approach « Let's nurture the wish to be responsible », a system with labels (development since 2019) will allow to control the level of compliance of the branches with the EHS standards of the Group which are issued from GBH EHS Excellence framework.

Every 2 years, following the evaluation realized by the Head of Safety & Environment for the Group, each subsidiary will be assigned a Label to reward their level of compliance with the Standards of the Group. This certification approach also aims at generating internal benchmarking and at putting forward the most virtuous subsidiaries on issues like Safety & the Environment.



*4 different Labels awarded depending on the level of maturity and commitment of the subsidiary.*

# GBH

LET'S NURTURE THE ENTREPRENEURIAL SPIRIT...