

# Code of Business Conduct



**avertim**

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## **CODE OF CONDUCT LIFE CYCLE**

# Our Code Of Conduct

## Principles

Our Code is a guide defining the general principles to live by our Values and help us in making ethical decisions. The Code applies to every Avertim's Group's entities as well as to all their internal & external employees and corporate officers. All are expected to read, understand, and follow its principles.

Avertim is devoted to creating a community of fulfilled employees and partners who are stimulated to drive positive change for our society and our planet. To ensure that the impact of the work of its employees is positive, the Avertim Group upholds high standards of conduct and ethics, that meets our employees' most important sources of motivation: caring, learning and results.

Avertim Managing Board endorses the principles outlined in this Code of Conduct, which applies to all markets where Avertim Group is active. These principles apply to anyone acting on behalf of Avertim, whether company executives, employees or subcontractors.

Likewise, Avertim encourages its vendors to adhere to its Supplier Code of Conduct, derived from the same ethical principles.

Avertim expects its employees to act professionally in accordance with these ethical principles, in all circumstances, regardless of their profession or level of responsibility.

This Code is based, among others, on the United Nations Global Compact, the United Nations Guiding Principles and the fundamental conventions of the International Labour Organization (ILO).

## A word from the CEO

*"With this Code of Conduct, we intend to further embed sustainability and ethics into our culture and strategy. These governing principles will be our compass for the years to come. Together with our teams, let's promote our values and help our clients perform, innovate and comply, in an ethical way."*



# About Avertim

## What We Stand For



### Our mission

Avertim is an Innovation and Management consulting group dedicated to build the bridge between Strategy and Operations. Our mission is to translate client's strategy into actionable projects and enable Business, Technology and Management alignment.

Avertim is advising large multinational companies or public organizations, by helping them on three main challenges:

- How to increase performance?
- How to drive innovation?
- How to leverage compliance?

### Our vision

Avertim development is driven by a strong vision:

- Avertim is a European innovation and management consulting group recognized as a trusted partner by top players in diverse sectors.
- We support our clients in managing their future challenges and achieving their complex transformation programs.
- Avertim unleashes the potential of top talents proud to join an attractive group and live a culture of experience, excellence & diversity.
- We are a community of fulfilled employees & partners committed to drive positive change for our society and our planet.

### Our 7 values

A

**Ambition:** We are ambitious in the way we maximize development growth, effectiveness and efficiency by setting the highest standards.

V

**Value:** We put a strong emphasis on providing value to our clients with quality services, tangible results and measurable benefits.

E

**Experience:** The strong academic background and seniority of our consultants are the best guarantee of the success of your enterprise.

R

**Respect:** We value diversity among people, ideas, beliefs and points of view. It is part of our approach to show respect for our clients, colleagues or any individual we meet.

T

**Trust:** Truth makes mutual trust possible and allows transparency, reliability and stakeholder's involvement at every stage.

I

**Involvement:** We strongly encourage our consultants to take part in internal initiatives and become major actors of the company development.

M

**Mindset:** Our people value high work morale, positive attitude, visible energy and sense of humor.

# The Way We Work Together

## *Equal opportunities & inclusion*

We promote equal opportunities within our teams because we believe our strength lies in our diversity. The Group prohibits all forms of discrimination and promotes respect, i.e., to behave with others as one would like to behave with oneself in accordance with the [ILO's Conventions No. 111](#) on discrimination.

Avertim Group ensures it treats candidates, freelancers, employees pursuant to the principles of equality and non-discrimination from recruitment on. The recruitment criteria are based solely on merit, results, or performance and on skills, professional experience and personal aptitude. Avertim does not discriminate against any employees on any ground including origin, religion, disability, physical appearance, health, age, gender, sexual orientation, political opinions, nationality, or family situation.

## *Protection against proselytism*

Proselytism refers to the act of attempting to convert or persuade others to adopt a particular set of beliefs or practices, typically in a religious or ideological context.

Avertim is committed to providing all Avertimers with a respectful and inclusive environment, regardless of their beliefs.

Therefore, Avertim prohibits any form of proselytism while interacting with colleagues, clients or business partners. This includes, but is not limited to, distributing religious or ideological materials, attempting to recruit religious or ideological believers, or forcing others to attend religious or ideological events.

## *Freedom of speech & Social Media*

Avertim is committed to guaranteeing freedom of thought, conscience, and speech.

In this digital age, Avertim recognizes the power of social media as personal and professional tools. At the same time, Avertim expects its collaborators to make a responsible use of social media, in accordance with Avertim's values, its Code of Conduct and applicable laws. We all are responsible for protecting the reputation of Avertim and its clients.

In case of uncertainties, Avertimers should consult our External Communication department, [marketing@avertim.be](mailto:marketing@avertim.be), solely entitled to publicly represent Avertim.

## *Respect of private life*

Avertim recognizes the right to respect for private and family life. As such, Avertim ensures compliance with the [European Data Protection Regulation](#). The Group handles its employees' personal data with respect and will only collect personal data for specific, explicit, and legitimate purposes, and limit the data collected to only what is necessary for the purpose for which it was collected.



### *What should I do?*

**Q:** I no longer wish my image or name to be used for marketing or commercial purposes by Avertim.

**A:** I should immediately forward a request to exercise my rights to the Data Protection Officer by writing to [privacy@avertim.com](mailto:privacy@avertim.com)

# The Way We Work Together

## Ethical behaviour

Avertim is committed to conducting its business in an ethical way and in accordance with its values.

We therefore encourage employees to report, in good faith, any ethical warning in connection with Avertim collaborators to the Ethics Committee. The latter will ensure that such reports are investigated, and appropriate actions are taken in a confidential, objective and impartial way.

In case of any concerns regarding ethical matters, please refer to Avertim Ethics Committee policy which describes its guidelines regarding its scope, alerts, confidentiality and investigation procedures.

### In practice

If you have any question, please refer to the Ethics Committee policy or send an email to the following email address : [ethics.committee@avertim.com](mailto:ethics.committee@avertim.com)

Read the Ethics  
Committee policy



## People development

We think learning by experience and knowledge sharing with peers are the best ways to develop skills and progress.

Avertim knows that its most valuable asset is the knowledge of its people and gives great importance to the professional development of its Avertimers. Trainings are organized and offered to ensure continuous learning and improvement possibilities.

### What should I do?

**Q:** How should I develop my career path as an employee at Avertim?

**A:** I should :

- Consult the **training agenda**
- Have a look at the **Boost program page**
- Check your emails to not miss out on invitations to future training courses.
- Contact the dedicated team at [training@avertim.com](mailto:training@avertim.com)

## Recruitment process

Avertim is committed to offering a personalized, transparent and efficient recruitment process by being highly proactive, by maintaining contact and by providing feedback as well. The HR team wants to become a privileged point of contact whose primary concern is to provide a pleasant and engaging experience from the first exchange to the integration of the candidate.

# The Way We Work Together

## Health & Safety at the workplace

The Group takes all the precautions necessary to protect the physical or mental health of staff in accordance with the ILO's Convention No. 155 on Occupational Safety and Health. In case of workplace accidents, a procedure is detailed on our Intranet to prevent them and facilitate the life of our employees in case of happening.

Besides, financial team takes care of providing protection services to our employees (e.g., professional insurance, pension, etc...).



### What should I do?

**Q:** I have had an accident on my way to work or at work, what should I do? Who should I tell?

**A:** Please inform your line manager as soon as possible and send an email to [prevention@avertim.com](mailto:prevention@avertim.com) to inform the team in charge at the group level.

## Well-being at work

A key value at Avertim is the respect of the balance between private and professional life. It is crucial that every employee finds his/her balance.

Do you find it difficult to organize your family life? Do you find it difficult to manage your workload? Do you find it hard to disconnect back home? All these points are signs of a lack of a work-life balance. To prevent those signs from happening, we monitor employee satisfaction through a yearly satisfaction survey: the Social Barometer. This survey is a way to express employee's honest and candid opinions and for Avertim to take decisions regarding the survey's results.



### In practice

If you cannot find this balance, it is essential to find a solution as soon as possible. Do not hesitate to contact:

- The Director of Talent Development
- Your Manager or Country Director to help you improve the situation.

Avertim is very sensitive to recognition marks within the organization. Non-financial recognition has been translated into several initiatives such as a yearly award ceremony, oral appreciation, teambuilding activities and the work recognition month. We believe that Avertimers are more engaged and motivated in their work when they are recognized, which leads to better results and encourage team spirit.



# The Way

## We Care for our Society & Environment

### *Violence, harm, harassment*

Avertim does not and will not use corporal punishment or other forms of mental and physical coercion, or verbal, cruel or abusive practices as a form of discipline. The Group intends to provide staff with a workplace that is free from violence, intimidation, hostility or disrespect, to offer effective protection to victims of moral harassment and to witnesses of such situations.

No form of psychological, physical, sexual, verbal, intimidation, threatening or harassment will be tolerated, in accordance with the ILO's Convention No. 190 on Violence and Harassment. Avertim's stakeholders agree to comply with the United Nations Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, which entered into force in 1987.

### Did you know?

Harassment can be sexual or non-sexual in nature. It includes:

- Inappropriate touching
- Requests for sexual favors
- Unwanted advances
- Sexually suggestive comments or jokes
- Inappropriate comments

### *Slavery & forced labor*

Consistent with the guidelines of the International Labour Organization, Avertim does not and will not employ children, prison labor, bonded labor. Avertim encourages all its employees and stakeholders to act in this way and to report to the Ethics Committee any problematic situation within the group or in the environment of our activities.

Avertim ensures that no employee is required to perform forced or compulsory labor in accordance with the ILO's Convention No. 105 on the Abolition of Forced Labor.

As for any ethics related concerns, please contact the Ethics Committee at : [ethics.committee@avertim.com](mailto:ethics.committee@avertim.com)

Read the Ethics  
Committee policy





# The Way

## We Care for our Society & Environment

### *Human right protection*

At Avertim, we have a responsibility to respect human rights, wherever we do business.

This means making sure to prevent, mitigate, and if needed solve adverse impact our business activities caused to our clients, our partners, our employees as well as those living in the communities in which we operate.

### *Involvement in local communities*

We consider as much as possible the social and political impacts associated with our projects. Through their business activities, our consultants contribute to advancing science and improving health and environmental safety.

#### In practice

We encourage our employees to free up time to engage in the pro bono and caritative missions we developed through partnerships. If you want to get involve in local communities' initiatives, you can reach out the CSR team trough [csr@avertim.com](mailto:csr@avertim.com).

We put a strong focus on reorganizing and reinforcing our links with the community. We act for local associations who stand for education, diversity, health and environment. Together, we believe we can have a stronger impact on the collectivity.

### *Protection of the environment*

#### In practice

Avertim's CSR initiatives aim to reduce our environmental impact through mobility transition, waste reduction, and fostering a sustainable mindset.

Avertim makes continuous efforts to prevent pollution. The company is devoted to better manage its resources' utilization. Avertim sets ambitious goals to support its employees in their mobility transition through initiatives to encourage greener ways to commute, such as the Mobility Plan in Belgium. Actions are set to reduce its environmental footprint and builds this awareness in all its employees.

#### What should I do?

1. Feel free to adopt and share eco-friendly practices for the day-to-day work .
2. Keep in mind that each small effort contributes to global improvement.
3. Bring your ideas to the table and initiate positive impact projects.



# The Way

## We Manage our Business Activity

### *Utmost Good faith & Integrity*

Integrity and intellectual honesty must guide the actions of the Group, both in interprofessional relations and in actions involving the personal responsibility of each member.

It is therefore essential that each of the people making up Avertim Group acts with integrity and good faith. Avertim places great value on the exemplary behavior of its employees as well as on respect for human rights, and hence undertakes to report any actions that are in contradiction with these principles.

Hereunder, you will find a non-exhaustive list of work ethic & integrity behaviour Avertim expects from its employees:

1. **Punctuality:** getting projects completed when due, showing up on time, following break-time protocols or informing your supervisors of any setbacks or challenges with as much lead time as you can.
2. **Accountability:** shouldering the responsibility for projects happening or even taking the blame when things go wrong.
3. **Focus:** it is hard to pay attention if you let yourself get distracted by chatter, social media and the like.
4. **Initiative:** Showing initiative is the way to indicate that you value results and are willing to do what it takes to ensure the company's success.
5. **Professionalism & dedication:** Showing up and taking work seriously, treating others with respect and dressing appropriately for the job are all aspects of being professional.
6. **Desire to improve:** Employees who embrace feedback and teaching moments show that they're willing to work to grow in their jobs. This helps management know which employees have the most potential.

### *Serving the client's best interest*

Serving the best interests of our clients is paramount to us, to respond to their specific needs and expectations, adapted to their requirements.

Avertim maintains relationships with all its stakeholders (i.e., clients, suppliers or other business partners) based on honesty and fairness.

Accordingly, the Group is committed to honoring its contractual obligations and spirit of its business agreements. In that case, employees must ensure that they act with professionalism, integrity and fairness.

As a consulting company, our aim is to ensure that our clients are treated fairly, to act in their best interests in accordance with the applicable rules on duty, and to pay particular attention to understand and respond to their needs.



# The Way

## We Manage our Business Activity

### Anti-corruption policy

Avertim Group forbids all forms of bribery, be it active or passive, direct or indirect (by an intermediary, co-contractor, subcontractor, supplier, consultants, advisers, commercial partner) when working with clients and partners, and regardless of the amount involved. At Avertim, the principle of zero tolerance towards corruption is applied.

We are committed to complying with all anti-bribery principles applicable to the following matters: gifts and hospitality, donations, charitable contributions, sponsorship, conflicts of interest, lobbying, facilitation payments, partnerships, mergers and acquisitions. These principles are detailed in Avertim's Anti-Bribery policy.

Avertim commits to never make payments to partners, subcontractors, suppliers, consultants, agents or other intermediaries, if we know, or have good reason to believe, that part of the payment will be used to corrupt or improperly influence a person.



### What should I do?

**Q:** What should I do if I have any doubts about a suspected corrupt practice?

**A:** I immediately inform Avertim Ethics Committee reaching out the reporting manager or sending an email to the following address : [ethics.committee@avertim.com](mailto:ethics.committee@avertim.com)

Offering or receiving business gifts and invitations is often an appropriate way for business associates to display courtesy and respect for each other, provided they are reasonable in value, made in a transparent way and are not likely to create any kind of conflicts of interest.



### In practice

Exchanging small gifts or invitations will generally not be considered a breach of our Code of Conduct when it is :

- (i) Given pursuant to accepted business practices, including this policy.
- (ii) Not intended as an inducement.
- (iii) Consistent with applicable law.

If any doubt, please discuss with your line manager or with the Ethics Committee.

If you have any questions or doubts regarding any anti-bribery principles or about the process of how corruption matters are mitigated at Avertim, please refer to our Anti-Bribery policy hereunder:

Read the  
Anti-Bribery policy

# The Way

## We Manage our Business Activity

### *Client data protection*

We abide by the deontology of our profession and will never use clients' information for personal use nor for the benefit of third parties, make bulk extractions of information or duplicate information for personal use or for the benefit of third parties.

We commit to use clients' information for the sole purpose of the fulfilment of our missions at their side and the development our consultants' expertise to serve them better.

Avertim's employees commit to not exchange information with competitors on matters such as prices, margins, customer information or strategy.

### *Promoting free and fair competition*

Avertim commits not to compete unfairly towards third parties, which includes not seeking nor using confidential information about competitors for whom our employees used to work.



### *Managing conflicts of interest*

Conflicts of interest can arise in different situations when the personal interest of an employee or one of his/her relatives interferes with the interest of Avertim, or its performance, or the execution of its obligations.

Managing conflicts of interest appropriately is essential for protecting the integrity of our company.

The relationship of the company with its employees should be based on mutual trust. As the company is committed to preserve the interests of people under its employment, it expects them to act only its own fundamental interests.

If you would like to know more about how conflicts of interest are handled at Avertim, please read the Anti-Bribery policy.

#### In practice

In case anyone (employee, freelancer, corporate officer, third party...) notices he/she might face a situation of conflict of interest, he/she is expected to inform his/her line manager or the Ethics Committee without delay and refrain from getting involved in the concerned decision-making process.

Read the  
Anti-Bribery policy

# The Way

## We Manage our Business Activity

### *Use of the company's IT resources*

Avertim employees must comply with the Group's IT and Telecommunications regulations.

Information technology (i.e., hardware, software, networks and the information they contain) is a key factor in the success of the business and should be used responsibly and only for legitimate purposes.

E-mails should be written with the same care as any other written communication. More than that, employees are prohibited to use Avertim's IT systems to access, save or send web pages or messages with illegal or defamatory content.

Read the IT policy

### *Freedom of association*

Avertim Group respects the freedom of association by promoting social dialogue and by respecting the right to constitute, to adhere or to refuse to join a non-profit association organization in accordance with the ILO's Conventions No. 87 on Freedom of Association and No. 98 on Collective Bargaining. As part of its CSR program, Avertim offers its employees the possibility to support non-profit associations through a digital platform that allows companies to connect with non-profit organizations.

### *General working rules*

The Group has defined golden rules that apply to all offices, in line with Avertim values:

- Keep a welcoming and professional atmosphere
- Guarantee a positive candidate experience at the office
- Maintain a pleasant & clean working space for all Avertimers
- Be green and conscious
- Secure your data and your confidential documents
- Make sure to comply with your client's health and safety policy & instructions

We expect our employees to commit to those general rules and respect them to the extend possible.

### *To go in-depth*

The working rules are detailed for each of the 4 countries in which Avertim is active. Please find the detailed information on our Intranet.



# Our Code of Conduct

## Life Cycle

### Reviews of the code

Avertim Group is committed to reviewing and updating its policies and procedures on a regular basis. Constantly adapting to a changing society, Avertim Group undertakes to amend this charter whenever necessary.

Should the Code be revised, changed, or amended by the Board of Management, with the different entities that make up Avertim Group, the final updated version will consistently be displayed to our stakeholders.

| Versions | Adopted by               | Date       |
|----------|--------------------------|------------|
| 1.0      | Avertim Ethics Committee | 19/12/2022 |

### Implementation of the code

It involves communicating the policies and guidelines to all Avertim's workers and providing any necessary training to ensure they understand the code.

The code will be released on Avertim's website and posted on our Intranet.

Furthermore, an online training will be conducted to make sure every employee is aware of those principles and understands them properly.

### To go in depth

For further details about conduct regulations, guidelines and policies at Avertim, consult the following documents:

- ✓ Ethics Committee policy
- ✓ Anti-Bribery policy
- ✓ Supplier Code of Conduct
- ✓ IT policy

### Code of Business Conduct endorsement

We, Avertim Ethics Committee, expect everyone acting on behalf of Avertim to comply in accordance with this Code of Business Conduct.

This Code of Conduct has been validated on 19/12/2022 by Avertim Ethics Committee.

Hervé LEFEBURE

Alix d'ABADIE

Bruno TOUZE



# avertim

Perform. Innovate. Comply.



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