



# The Eurofins Group Equal Opportunities and Fair Employment Policy

The Eurofins Group promotes equal opportunities and believes that a diverse workforce, representing a range of perspectives and experiences, is best for everyone.

*Message from Eurofins CEO, Dr. Gilles Martin*



## THE EUROFINS STANCE TOWARDS EQUAL OPPORTUNITIES AND FAIR EMPLOYMENT

The Eurofins Group<sup>1</sup> is committed to providing a safe working environment, free from harassment, bullying and discrimination. The Eurofins Group promotes equal opportunities and believes that a diverse workforce, representing a range of perspectives and experiences, is best for everyone. All of our people should be treated, and treat others, with dignity and respect, as described in the basic commitment in the Eurofins Group Code of Ethics:

***“We value all of our people, for their contribution to our business. The relationships with and between them must be respectful, honest, safe and professional.”***

Based on this commitment, this Policy sets out Eurofins’ approach to:

- a. Equal opportunities and fair employment (Section A); and
- b. Harassment and bullying (Section B).

This Policy also sets out who should be contacted in connection with harassment, bullying or discrimination concerns (see Reporting below).

### HOW THIS POLICY WORKS

This Policy applies to all aspects of employment, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

As employment matters are governed by local laws, this Policy has to be read as recommendations and guiding principles, not as a legally binding document committing any Eurofins Company. It needs to be implemented in local policies, rules and processes by each Eurofins Company according to the locally applicable laws.

Eurofins expects its leaders, directors and employees (referred to in this Policy as **“Eurofins Members”**)<sup>2</sup> to:

- follow all legal obligations applicable in the country/company in which they are active; and
- behave in accordance with the principles laid out in this Policy and related Group policies, the [Eurofins Group Code of Ethics](#), [Eurofins Values](#) and [Eurofins Leadership Charter](#).

All senior leaders and directors have a specific responsibility to operate within the boundaries of this Policy, implement locally valid documents to enforce the recommendations laid out in this Policy in their companies, and ensure that all employees understand the standards of behaviour expected of them and to take action when behaviour falls below the requirements of this Policy.

The Eurofins Group Operating Council is responsible for this Policy and may amend or update it from time to time.

The Eurofins Group Operating Council recommends and will ensure that all companies belonging to the Eurofins Group adopt formal policies and/or recommendations in line with the objectives of this document and Eurofins Values, taking into account local legislation and customs, as well as appropriate business practices. If there is a conflict between this Policy and applicable laws in a particular region or country, applicable laws will prevail. If there is a conflict between this Policy and local policies, please speak to the Eurofins Head of Legal to determine the best course of action.

This Policy should be read in conjunction with the [Eurofins Group Code of Ethics](#).

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<sup>1</sup> Eurofins or Eurofins Group or “we” means Eurofins Scientific SE and any entity directly or indirectly controlled by it, each individually referred to as a “Eurofins Company”.

<sup>2</sup> The terms leader, director, employee, Eurofins Member and any other terms designating persons or groups of persons as well as the terms “he” or “she” in this Policy are not meant to specify any gender and are to be read as being strictly non-discriminatory.



## SECTION A: EQUAL OPPORTUNITIES AND FAIR EMPLOYMENT

### OUR GUIDING PRINCIPLE

All employment-related decisions in any of the companies of the Eurofins Group, anywhere in the world, must be based on job-related or legitimate business considerations. Legally protected characteristics such as age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, or any other characteristic protected by law must not be taken into account when making such decisions.

### RECRUITMENT AND SELECTION

Recruitment, promotion, and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination and must comply with local laws. Recruitment procedures should be reviewed regularly to ensure that individuals are treated on the basis of their skills, experience and abilities.

Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

Job applicants should not be asked questions which might suggest an intention to discriminate. For example, applicants should not be asked about their age, disability, health status or whether they are pregnant or planning to have children.

### TRAINING, PROMOTION AND CONDITIONS OF EMPLOYMENT

Training needs should be identified through regular appraisals. Eurofins Members should be given appropriate access to training to enable them to progress within the organisation.

All promotion decisions shall be made on the basis of merit.

Conditions of service and benefits provided to Eurofins Members should be reviewed regularly. It needs to be ensured that any benefits are available to all those who should have access to them and that there are no unlawful obstacles to accessing them.

### DISCIPLINARY MATTERS AND TERMINATION OF EMPLOYMENT

Disciplinary procedures and penalties should be applied without discrimination, whether they result in disciplinary warnings, dismissal or other disciplinary action.

### DISABILITIES

Eurofins Members who experience difficulties at work because of a disability should be provided with appropriate support, including a discussion of adjustments that might help overcome or minimise the difficulty.

## SECTION B: HARASSMENT AND BULLYING

### WHAT ARE HARASSMENT AND BULLYING?

Legal definitions of harassment and bullying differ in different countries.

For the purposes of this Policy, “**harassment**” includes any unwanted conduct that creates an intimidating, humiliating, hostile, degrading or offensive work environment for any person, or which violates the dignity of any person. It can be physical, verbal and non-verbal conduct. It includes unwanted sexual conduct.

A single incident can amount to harassment.

Harassment could be related to a particular characteristic such as age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation. These are examples only. Eurofins Policy is that harassment is unacceptable even if it does not fall within any of these categories.



Harassment may include, for example:

- a. sending or displaying material that is pornographic or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the Internet);
- b. unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- c. racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group, nationality, origin or gender;
- d. outing or threatening to out someone as gay, lesbian or bisexual;
- e. sharing offensive e-mails, text messages or social media content; or
- f. mocking, mimicking or belittling a person's disability.

For the purposes of this Policy, “**bullying**” includes offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- a. physical or psychological threats;
- b. overbearing and intimidating levels of supervision; or
- c. inappropriate derogatory remarks about someone's performance.

Bullying and harassment are not tolerated in any work-related situation, whether in the workplace and/or during working hours or not.

Legitimate, reasonable criticism of someone's performance or behaviour, or reasonable instructions given to Eurofins Members in the course of their employment, will not amount to bullying on their own.

## REPORTING

### IF YOU ARE BEING HARASSED, BULLIED OR DISCRIMINATED AGAINST OR IF YOU WITNESS HARASSMENT, BULLYING OR DISCRIMINATION

Any Eurofins Member who witnesses bullying or harassment must report it in accordance with the applicable local guidance, Policy or process, or, if no such guidance, Policy or process exists, in writing to the President or Managing Director of the Eurofins Company that he or she works for (as defined in the Compliance Queries section of Eurofins Group Code of Ethics) to allow appropriate support and investigation.

Any Eurofins Member who:

- a. experiences bullying or harassment at work or who witnesses such conduct; or
- b. who believes that he or she has suffered discrimination, or that someone else is being discriminated against,

is strongly encouraged to report this. The local human resources function can provide confidential advice and assistance in resolving the issue. In some serious cases, or where one may be afraid of retaliation, it may be appropriate to report such concerns to the Eurofins Whistleblowing Point of Contact. The Eurofins Whistleblowing Point of Contact – hosted by external professionals bound by confidentiality - will give an opportunity to report any breaches in situations where reporting to local leaders or functions may be difficult or impossible. For more information on whistleblowing, please see the Company's intranet site (DMS) and the Company's website: [Whistleblowing Contact](#).

Whilst reporting these matters may be difficult or embarrassing, doing so helps the relevant Eurofins Company to make sure that prompt and effective action is taken.

The decision whether to progress a complaint is ultimately up to the individual, but Eurofins has a duty to protect all Eurofins Members and may in some circumstances decide to pursue the matter independently if, in all the circumstances, it is considered appropriate to do so.



## **INVESTIGATIONS**

Eurofins will investigate complaints in a timely and confidential manner. Investigations should be thorough, impartial and objective, and carried out with sensitivity and due respect for the rights of all parties concerned, and in accordance with applicable laws.

## **ACTION FOLLOWING THE INVESTIGATION**

Eurofins takes a strict approach to breaches of this Policy. If it is considered that harassment, bullying or discrimination has occurred, prompt action will be taken to address it including appropriate disciplinary action. The matter will be dealt in accordance with applicable laws and policies.

## **PROTECTION AND SUPPORT FOR THOSE INVOLVED**

Eurofins Members who make complaints or who participate in good faith in any investigation into bullying, harassment or discrimination must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to appropriate disciplinary action.

## **GENERAL QUERIES**

Individuals are encouraged to communicate any questions about this Policy and its application to their direct supervisors or relevant Eurofins legal department. If you are unsure who to speak to, or if you would prefer to communicate questions beyond the Company that you work for, please contact Compliance Helpline on the Company's intranet site (DMS).

On behalf of the Eurofins Group Operating Council

Dr Gilles Martin  
Chief Executive Officer

