

# AGENCY CODE OF ETHICS

# UNDERPINNING OUR CORPORATE CULTURE

**As part of the objectives entrusted to it by the State, Business France and all of its employees undertake to contribute to the international development of businesses in each of its three divisions: Export, Attractiveness and the VIE international internship program.**

Our teams work daily to meet the Agency's public service remit and promote France abroad. The very essence of our business requires employees to conduct themselves to the highest standard, both internally and with our partners and clients, whether they are in France or abroad.

Business France has implemented a comprehensive governance and risk management system based on the following pillars:

- ➔ A risk map updated annually, which includes the corruption risk map.
- ➔ An annual audit plan approved by the Audit and Ethics Committee.
- ➔ A certification of the accounts presented to the Board of Directors.
- ➔ An audit by the Court of Auditors every five years.

This Code of Ethics underpins our corporate culture.

It specifies the rules and principles, which constitute the reference framework for all of our workers, beyond the rules of common law applicable to all employees. Everyone undertakes to respect these rules from as soon as they start work at the Agency. This Code is also intended as a tool for making decisions and resolving any cases encountered, in particular by identifying the right contacts. It is supplemented by an internal Code of Conduct, which is intended to facilitate the application of its rules on a daily basis and to specify the systems put in place.

To make our operating methods as transparent as possible, this Code applies not only to our employees but also to our associates (notably our clients, suppliers, partners, etc.).

Business France has set up a Compliance Team, made up of representatives from our teams in Paris, France's regions and abroad. An Ethics Officer has also been appointed. They may be called upon at any time, internally or externally, to answer any questions relating to the interpretation or application of this Code of Ethics, or in the event of a potential conflict of interest, via the following address: [Referent-Deontologue@businessfrance.fr](mailto:Referent-Deontologue@businessfrance.fr)

A whistleblowing system has also been created, with a special contact email address: [ReferentLA@businessfrance.fr](mailto:ReferentLA@businessfrance.fr). It enables any employee and any third party of Business France to report in a completely confidential manner any act contrary to ethics, regulations and integrity. In compliance with the law, Business France undertakes to protect whistleblowers and respect their anonymity.

*NB: In the text below, the term "client" designates the French businesses that we support for export activities, foreign investors, regions and territories, as well as VIE international internship candidates and talent.*

# BUSINESS CONFIDENTIALITY

Our business activities result in employees, at all levels, holding and having access to information of a confidential nature, relating to the Agency, our partners and our clients' projects (particularly in terms of strategy and export development or investment in France), etc.

This applies, in particular, to any information relating to business confidentiality or the procedures put in place by the Agency for access to its services, economic and financial information held on natural or legal persons and, where necessary, content from the examination of particular files.

Respect for confidentiality is the guarantee of the trust placed in us by our associates. As such, all of our employees must undertake to not disclose outside the Agency any information of which they become aware in the performance of their duties, and to ensure that confidential documents are stored securely.

We also ensure that our databases and information systems are secure. There is a charter for use of the Agency's information systems available for our teams, which details the rules regarding data use, data storage and the procedures for secure access to our systems outside the business premises.



# IMAGE DUTY OF RESERVE LOYALTY

Openness forms an integral part of the values held by Business France. In this context, the promotion of the image of the Agency and its activities is encouraged, so too is the publication of feedback on the suggestions and the perceptions from our associates.

However, the nature of our activity, and the diversity of our associates, both in France and abroad, means that we must be particularly attentive to the type of comments made by our employees. Everyone is aware of the duty of reserve that they must respect and of the duty of loyalty, which requires them to not bring the image of the Agency, its activities and its employees into disrepute.

Employees can refer to the Corporate Press Charter, which defines the approval procedures for all external communication (publications, conferences, interviews or other public interventions).

Given our positioning, we also ensure that the actions of the Agency are consistent with those of French diplomacy, particularly in the areas of Human Rights, Defense and Security, Climate and commitments in sports and digital diplomacy. Employees can obtain information directly by clicking on the following link – [French Foreign Policy - Ministry for Europe and Foreign Affairs \(diplomatie.gouv.fr\)](https://diplomatie.gouv.fr) – or by contacting the Agency's International Network Department.

# PROTECTION OF PRIVACY

Business France is committed to respecting the privacy of its employees and its associates: suppliers, clients, partners, VIE international internship candidates, etc.

As such, and in accordance with the GDPR (General Data Protection Regulation), the Agency has put in place procedures governing the processing and storage of the personal data in its possession. It has also appointed

a Data Protection Officer (DPO), within the Risk and Quality Audit Team.

External requests concerning the management of rights can be sent to the following web address:  
<https://dpo.businessfrance.fr>



# TRANSPARENCY EQUAL TREATMENT

As a recipient of public funding, whether it is a beneficiary or a manager on behalf of the State, the Agency, one of whose key values is integrity, is particularly attentive to the conditions under which it awards its contracts. It has therefore defined procedures applicable by all employees to ensure transparency, equal access and treatment in the selection of its suppliers, in compliance with European law and the French Public Procurement Code.

The Agency hereby undertakes to regularly reopen competition among its service providers in relation to contracts for the supply of goods and services.

It also ensures that they provide guarantees in terms of both integrity and professional ethics. In accordance with the Sapin II Act, the Agency therefore carries out an assessment of third parties, which applies to all its service providers and suppliers.

Furthermore, in the event that clients have conflicting interests, we ensure that our employees systematically respect the principle of fairness.



## CONFLICT OF INTEREST

All of our employees undertake to refrain from any dishonest behavior, and not to find themselves in a situation of conflict of interest.

As such, all employees are informed that they cannot have, directly or through an intermediary, links to a firm related to the Agency that would be likely to compromise its independence. The same applies when a business requests an individual favorable decision

from an Agency employee who has a close relationship, be it through their family or friend, with that particular business.

This rule also applies to the members of the Agency's Board of Directors, who, in November 2017, approved the implementation of a Code of Ethics for Administrators annexed to the internal regulations of the Agency's Board of Directors.

# GIFTS GRATIFICATION INVITATION

Our teams should also be aware of the risks of corruption. In the case of solicitation of third parties, the Agency's policy (detailed in the internal Code of Conduct) is intended to be both sufficiently objective and protective for itself and its employees, while considering the customs and practices of the countries in which the Agency carries out its activities; in which case, details are provided in the organizational memorandum.

All Business France employees hereby undertake to refuse any advantage offered by a third party that could place them under obligation to the donor and harm their objectivity or the image of the Agency. Gifts, advantages, invitations or gratuities must, in any case, remain a symbolic gesture, whose value and frequency must remain reasonable.

Gifts corresponding to usual practices in the context of professional relations, of modest value, without personal aspect, and offered at the time of the end of year celebrations in particular<sup>1</sup> are accepted.

Invitations to lunch that may be of interest to the Agency may be accepted if they fall within the usual practices of professional relations in terms of frequency and cost. The same goes for lunches as part of company site visit programs.

Invitations to participate in seminars or "working breakfasts", or even to speak at them, are acceptable if they present a real interest for the service and there is nothing offered in return.

<sup>1</sup> The Order of June 10, 2016, set the value of a gift at €69 including tax per year and per beneficiary, the value of which is considered "very low" and has no impact, in accordance with the requirements of the General Tax Code (Articles 206 appendix II, 3° of point 2 of IV and 28-00 A of Appendix IV). Beyond that, VAT on gifts is not deductible, and the entity offering the gift must make a declaration.





# PROTECTION OF BUSINESS FRANCE ASSETS



The assets of Business France (tangible or intangible), made available to all of its teams as part of their activities, must be given special attention.

In accordance with the relevant laws and the Charter on the Use of the Agency's Information Systems, each employee must:

- ➔ Refrain from any criminal or abusive use of electronic means of communication.
- ➔ Abstain from any private use of the telephone network, outside the framework of the necessities of everyday and family life.
- ➔ Not seek any reimbursement from the Agency for private expenses.
- ➔ Not appropriate property belonging to the Agency, even of minimal value.
- ➔ Respect the rules laid down within the Agency with regard to procurement, contracts and agreements, so as to obtain optimal conditions.
- ➔ Record accurately and honestly all types of encrypted data for which the employee could be responsible.



# FIGHT AGAINST DISCRIMINATION AND HARASSMENT

Business France is convinced that people are at the heart of the success of any project. It is the diversity of our employees, both in France and abroad, that enables us to offer quality support to our clients on a daily basis.

We are committed to fighting against all forms of discrimination and harassment. Awareness-raising measures are regularly carried out, an alert system has been set up and communicated and harassment

officers have been appointed to be the point of contact for employees on the subject

Any employee who does not respect this commitment, whether with respect to a colleague or a third party, is liable to be sanctioned.

## SAFETY AND QUALITY OF LIFE AT WORK

Our teams are spread over many sites in France and abroad. The status of Agency under the supervision of the French State gives Business France special exposure, particularly in politically unstable countries.

The safety of our teams is our top priority.

We are also keen to provide all our employees with a framework and working conditions that are conducive

to their activities, providing them with a professional and personal balance. We have also set up a career development service, enabling employees to undertake professional courses adapted to the development of the Agency and employees' individual needs and inspirations.



## Business France

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[www.businessfrance.fr](http://www.businessfrance.fr)



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