



ETHICS CHARTER

JULY 2025





For more than 70 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 more than €100 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: the public interest, equal treatment, solidarity, integrity, respect for the environment and the preservation of biodiversity. We uphold a code of ethics that binds us collectively and individually: 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 BRL Group

July 2025



«**"THINK GLOBALLY, ACT LOCALLY"**
"BEHAVE WELL, ACT WELL"
"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), BRL Group defines itself as a player who listens, committed to fundamental values:

- solidarity;
- equal treatment;
- 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 and the promotion of the common good;
- integrity and the fight against corruption;
- 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 as well as the regularity of practices in relation to established rules. Regular legal monitoring is carried out to this end.

The conformity of acts is under the authority of:

- The Legal and Corporate Social Responsibility Department (DJRSE) which defines the frameworks to be applied and implemented by the Company and Operational Departments and Services.
- The Audit and Internal Control Department (DACI) which ensures compliance with the applicable frameworks and the deployment of prevention measures specified in the mapping of risks of breaches of integrity and corruption and the associated action plan.

A culture of integrity and probity

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

Through its compliance and probity 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 regularity and probity 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 change, regional and global population growth, digital transformation, artificial intelligence, multifactorial crises, new social expectations), 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 which is nearing completion, and the new **VIA 2030** strategy, which is currently being developed, 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 in a context of profound climate change.

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 **VIA 2030** new strategy, which is currently being developed with the Board of Directors, the Executive Committee, and the entire management team of the BRL Group, constitutes a genuine commitment to individual and collective corporate responsibility, supported by a **"learning culture"**. This dynamic of lifelong learning enables the development and adjustment of 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. Together we can make a difference!



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, skills development and career path management. It promotes Quality of Life and Working Conditions (QLWC), enabling quality of life at work.

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 attentive to ecological and energy transition trends, transforming its model in order 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 at the heart of the Group's strategy.



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. As part of its Probity Plan, the Group is committed to fight against breaches of probity by setting up appropriate risk management systems within its companies (risk mapping, associated actions plans).

RESPONSIBLE PURCHASING

The BRL Group strives to reduce the environmental impact of its purchases and to strengthen its 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 (decarbonation, 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.

PREVENTION OF CONFLICT OF INTEREST

The way organizations operate can lead to relationships between individuals with professional or personal ties. Depending on the nature of these ties and the intensity of interactions, they can lead to situations of potential conflict of interest.

BRL's senior management has established rules to be followed by all Group employees in order to detect, prevent, and manage situations of conflict of interest that may arise. These rules are described in each company's Code of Conduct.

Spontaneous disclosure of interests is strongly encouraged within the BRL Group for all its stakeholders (employees, interns, directors, suppliers, etc.).

THE WHISTLEBLOWING 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 behaviour that could damage the reputation of the BRL Group or affect its activities would expose the perpetrator to liability for damages, in accordance with the Code of Conduct and Internal Regulations of the relevant Group company.**



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