



Anti-corruption code of conduct

Preventing and fighting against bribery
and influence peddling

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Foreword

Message from the CEO

Foreword

The ORPEA Group Compliance Program



Message from the CEO



The nature of our mission and our professions confers a great responsibility upon us. It is crucial that we earn and maintain the trust of residents, patients and their families, as well as that of public authorities and the third parties with whom we do business.

Taking on this responsibility, and ensuring we remain worthy of this trust each day, means we must pay strict attention to ensuring our quality standards are complied with throughout the Group. At the same time, it means adhering to our core values and the ethical principles set out in our Ethics and Corporate Social Responsibility Code of Conduct.

To support our global development, we must always remember that integrity knows no limits or boundaries. We must systematically strive to achieve the highest ethical standards in all of our business activities, in order to ensure the long-term future and viability of our company.

With this in mind, our Anti-Corruption Code is a key tool that will help everyone in the company conduct themselves in an irreproachable manner in terms of business ethics.

Moreover, I would like to underline the zero-tolerance policy that we have towards any form of corruption (bribery and influence peddling). I know that I can trust each of you to adopt these principles and make them a fundamental part of our corporate culture and I thank you for this.

Laurent Guillot

We must systematically strive to achieve the highest ethical standards in all of our business activities, in order to ensure the long-term future and viability of our company

Foreword

The foreword to the 2004 United Nations Convention against Corruption defines corruption as *«an insidious plague that has a wide range of corrosive effects on societies. It undermines democracy and the rule of law, leads to violations of human rights, distorts markets, erodes the quality of life and allows organised crime, terrorism and other threats to human security to flourish.»*

This Code, which is intended to be an element of the ORPEA Group's anti-corruption program, applies to all entities controlled by ORPEA worldwide, as well as to the employees, directors and officers of these entities. Each person has a duty to be aware of and comply with the applicable anti-corruption laws. With this in mind, this Code is attached to the Group's Rules of procedure (or equivalent country-specific document) and communicated to all ORPEA employees.

The ORPEA group is committed to fighting bribery and influence peddling as a French Group by applying the requirements of the French law on transparency, the fight against bribery and the modernisation of economic life (the so-called «Sapin 2» law). Moreover, due to its international scope, the Group must pay strict attention to ensuring compliance with foreign laws that also have extraterritorial effects, such as the Foreign Corrupt Practices Act («FCPA»), the UK Bribery Act and all other laws applicable in the countries in which the Group operates.

ORPEA has made a public commitment in this regard by joining the United Nations Global Compact in 2020, whose tenth principle states: *«Businesses should work against corruption in all its forms including extortion and bribery.»*

Therefore, the purpose of this Code, which is linked to the Group's bribery and influence peddling risk map, is to put in place measures that can help our employees, managers and administrators, regardless of the country, to adopt the right conduct when faced with a difficulty.

Failure to comply with this Code may result in legal and administrative sanctions for the Group, its officers and employees. Any failure to comply may result in disciplinary sanctions, up to and including dismissal, as well as legal proceedings against the perpetrator.

Finally, the countries in which ORPEA operates may have regulations and legislations on preventing and fighting bribery and influence peddling that are more or less restrictive. However, ORPEA considers that the rules of this Code are part of good business ethics practice. In the event that local regulations are more restrictive than the provisions of this Code, the more restrictive local regulations will prevail. Conversely, if local regulations are less stringent, this Code shall prevail.

The ORPEA Group Compliance Program

General overview

In order to effectively fight bribery and influence peddling, the Group has set up a compliance program. The roll-out of this program is underpinned by a strong commitment from the management team, which has provided ORPEA with the necessary resources. Its roll-out is also supervised by the Audit and Risk Committee of the Group's Board of Directors.

As stated in the foreword to this Code, signed by the Group's Chief Executive Officer, **ORPEA has a zero-tolerance policy towards corruption (bribery and influence peddling).**

This compliance program is mainly structured around eight components, all of which contribute to the fight against bribery and influence peddling, namely:



Key concepts - prohibited behaviour

Corruption: bribery and influence peddling

Facilitation payments

Conflicts of interest



This Code does not claim to provide an exhaustive description of all the risk situations that each Group employee may encounter. It does, however, aim to present the situations identified as being at risk as a result of the corruption risk map.

Faced with a potentially risky situation related to bribery or influence peddling, no employee should remain isolated and should immediately discuss or refer the matter to their line manager as well as to their Cluster Compliance Officer and/or to Group Compliance.

The following section sets out the main types of prohibited behaviour and illustrates these with practical examples.

Corruption: bribery and influence peddling

In this Code, corruption refers to bribery and influence peddling which are two forms of corruption. There are two types of bribery, namely active bribery and passive bribery:

- > **Active bribery:** when a person uses gifts or donations to obtain, or try to obtain, promises or advantages [whether for himself/herself or for a third party] from another person who holds a public or private position, with the result that the latter carries out, delays or omits to carry out an act that falls within the scope of his/her position or that may be facilitated by it. **This person is then referred to as the bribing party.**
- > **Passive bribery:** when a person exercising a public or private function takes advantage of their function by soliciting or accepting, at any time, gifts, promises or advantages with a view to performing or refraining from performing an act within their function. **This person is then referred to as a bribed person.**

These two offences, although complementary, are distinct and autonomous. Their perpetrators can be prosecuted and tried separately.



Public bribery refers to act in which the bribed person is a public official (a person holding public authority, entrusted with a public service mission or an elected official) or a member of the judicial system (judge, magistrate, court clerk, juror, assessor/auditor, arbitrator), whether in France or another country, or within an international organisation. **Private bribery** refers to a situation in which the bribed person is a person who does not hold a public office.

Note that the mere fact of **promising** an undue advantage already constitutes an act of bribery.

Influence peddling is very close to bribery, it consists, for a public or private person, in soliciting or accepting, at any time, directly or indirectly, offers, promises, gifts, presents or advantages of any kind for themselves or for others in order to use their actual or supposed influence to obtain distinctions, jobs, contracts or any other favourable decision from an authority or a public administration.

As with bribery, influence peddling can be active or passive, but also private (if the intermediary is a private person) or public (if the intermediary exercises a public function).

In practice

Dealing with a case of direct public bribery.

Within the framework of a development operation, you have been alerted to the fact that one of your employees, who recently joined the company, considered offering a luxurious gift to a public official during an internal preparatory meeting, in order to be favoured with the purchase of a well-located plot of land to build a facility. What should you do?



You should intervene immediately and explain to the employee that such practices are not tolerated within the Group and that public bribery is subject to very severe criminal penalties.

— and —

You should immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document.

In practice

Dealing with a case of influence peddling.

Following an incident in your facility, a public committee needs to meet to decide on possible sanctions. One of the members of this commission informs you that in exchange for a reduced price for a relative in your facility, he or she would be able to convince other members of the commission so that your organisation would not be subject to administrative sanctions.



You should refuse this proposal, which falls under the definition of influence peddling. This offence is very similar to the offence of bribery. Your acquaintance seeks to obtain an advantage - the price reduction - in exchange for the supposed influence he or she would have on other members of the committee.

— and —

You must immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document. You must also cease all dealings with the third party.

Dealing with a case of passive private bribery.

You are a facility director and during negotiations with a local supplier, the latter offers to overvalue invoices in exchange for providing you with gift vouchers for major brands. What should you do?



You should firmly refuse the proposal, pointing out the Group's ethical values and reiterating its zero tolerance towards bribery.

— and —

You must immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document. You must also cease all dealings with the third party.

— and —

To the extent possible, and in agreement with the Compliance and Legal Departments, no longer use this local supplier.

Facilitation payments

Facilitation payments are generally small unofficial payments offered or requested by public officials or private sector employees to facilitate or secure the completion of simple procedures or necessary acts that the payer has a right to expect or to speed up their completion, such as the issuance of an administrative authorisation.

Although facilitation payments are tolerated in some countries, the Group prohibits any form of facilitation payment.

In practice

Dealing with a request for a facilitation payment.

A local public electricity supplier offers to speed up the process of supplying electricity to a facility acquired abroad in exchange for a small amount of money. What should you do?



You should politely refuse to pay, since this is a facilitation payment. The local electricity supplier offers to speed up a process to which you are entitled, namely the supply of electricity. You can give them a copy of this Code and tell them that ORPEA forbids facilitation payments.

— and —

You should immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document.

For more information

Please refer to the document «Rule for facilitation payments».

Conflicts of interest

Conflicts of interest arise when an employee's personal interests are likely to conflict with the Group's interests.

Conflicts of interest can lead to situations of corruption, particularly because they can place employees in a situation where they are personally liable to third parties or where their personal interests could influence their professional decisions.

The Group wishes to avoid any form of conflict of interest, which is why it has set up a declaration form for all employees, with an obligation to declare for the most exposed persons, whether or not they are in a conflict of interest situation.

Conflicts of interest that are reported are investigated and followed up if necessary.

In practice

Dealing with a case of conflict of interest.

You are in charge of purchasing medical devices and are organising a call for tenders to list a new product. You have a friendly relationship with one of the contacts of a competing company. What should you do?



If you find yourself in a conflict of interest situation, you must inform your line manager and Compliance of this situation by fill-in the conflict of interest declaration form.

— and —

You must follow the action plan put in place by your line management and Compliance to deal with the situation. In this situation, there may be a question of you being replaced on this tender, or of you not having a say in the final selection of the service provider.

— and —

If possible, it would be appropriate to cease all dealings with the person you are close to until the call for tenders is completed, and a provider selected.

For more information

Please refer to the document «Guide for the prevention and management of conflicts of interest» and the form for the declaration of conflict of interest.

Anti-corruption program

Gifts and invitations received or offered

Assessment and management of third parties

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Donation and sponsorship

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ORPEA whistleblowing system

Sanctions



Gifts and invitations received or offered

As a general rule, ORPEA employees must ensure strict compliance with the applicable laws and regulations when giving or receiving any gifts or invitations. Such gifts or invitations must be entirely transparent, occasional, reasonable and justified by a professional and unambiguous purpose [i.e. not intended to influence the recipient's judgment or decision making].

It is forbidden to give or receive gifts as part of our dealings or relations with public officials. An invitation may be extended to a public official in a professional context, but the invitation must be justified and recorded in a register.

Gifts or invitations may be given or received as part of our dealings or relations with private parties, as long as the principles set out above are complied with.

Before offering or accepting a gift or invitation, it is essential to consider the stage of the business relationship and the position of the person concerned [public/private]. For example, during a call for tenders, a contract renewal or pending the outcome of an administrative process involving public officials, accepting/offering a gift or invitation is strictly prohibited.

In practice

Invitation to a public official.

A local authority is due to attend the opening of a new facility for which you are responsible. After the opening, you would like to invite the public official in charge of the local authority to a restaurant in the town. What should you do?



You should first make sure that:

- > inviting public officials is legal in the country concerned,
- > we are not waiting for an administrative decision from the local authority in question.

Under these conditions it is possible to invite the public official.

— and —

However, the choice of restaurant should be reasonable, not too expensive and should comply with the Gifts and Invitations Policy.

— and —

The invitation must be justified and noted in a register.

For more information

Please refer to the document «Gifts and invitations policy».

Assessment and management of third parties

The term «third party» refers to all legal and natural persons that have entered into or may enter into a business relationship with ORPEA (suppliers, service providers, business partners, intermediaries, etc.), as well as any public officials with whom ORPEA is likely to interact.

The ORPEA Group is committed to selecting third parties who adhere to its values and respect ethical rules. To this end, a third-party assessment and management system has been implemented within the Group.

Not all third parties represent the same level of risk in terms of corruption. Below, we specify the categories of third parties that may represent a greater risk during our interactions or our business rela-

tionships with them. In this respect, particular attention should be paid to third parties involved in development operations as well as construction and maintenance companies.

However, it should be borne in mind that corruption can occur with any third party. Each employee must be aware of the warning signs and behaviour mentioned in Part 4 (Warning signs and behaviour to adopt).

The Group provides compliance officers with compliance databases and a due diligence questionnaire that can also be sent to third parties depending on their risk level. Finally, for high-risk third parties, a due diligence survey can be carried out.



Public officials

The term «public official» designates a person who holds a position of public authority, a person who is responsible for a public service mission, an elected official, or a member of the judicial system (judge, magistrate, court clerk, juror, assessor/auditor, arbitrator), whether in France or another country, or within an international organisation.

In the course of their duties, some of the Group's employees have contacts with public officials, such as representatives of health authorities and supervisory authorities or elected local officials. In terms of potential risk, these relationships can become particularly sensitive when we have submitted administrative requests/applications or in the context of public calls for tenders.

In their relations with public officials, each employee must:

- > Respect the legal framework of the country in question;
- > Have a clear and unambiguous discourse, which does not suggest at any time that we could resort to bribery or influence peddling;
- > Be accompanied, when possible, by another Group employee;
- > Use, when possible, the dematerialised services offered in the countries.

Particular care must also be taken as regards any relationships we may have with former public officials, who sometimes create their own consultancy firms and take advantage of their influence with current public officials. This type of advice can only be used after consultation with the Compliance and Legal Departments.

In practice

Soliciting a former public official to use their influence.

A public official from a health authority tells you that he is going to leave his post and set up his own organisation to provide consultancy services. He tells you that by using his influence with other existing public officials, he will be able to provide you with confidential information that could give ORPEA a competitive advantage. He suggests that you sign a contract to govern the relationship. What should you do?



You should refuse this proposal. This public official is seeking an advantage - remuneration as a consultant - in exchange for the supposed influence he or she would have on other public officials.

— and —

You must immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document. You must also cease all dealings with the third party.

— and —

If you are going to use consultants who have left the public sector, the contract should include expectations in terms of deliverables as well as remuneration, which should be linked to the service provided. In addition, an anti-bribery and anti-influence clause should be included. Such a contract must be validated by the Compliance and Legal departments.

Intermediaries

Intermediaries are natural or legal persons who act in the name of and on behalf of the ORPEA Group, their role being to facilitate interaction between the parties. They may interact with both private and public parties.

As such, they are **considered to be particularly at risk** because they engage ORPEA's responsibility, particularly when they carry out administrative procedures or any other assignment with public officials.

The intermediaries with whom we are likely to enter into business relations are in particular real estate **brokers, investment banks, lawyers, architects, business providers, etc.**

In this context, for each of them it is necessary to:

- > **Identify them and report them** to Legal and Compliance;
- > **Carry out a compliance check by the person in charge of compliance** [Cluster Permanent Controller];
- > **Remind them of the Group's zero tolerance of bribery and influence peddling**, provide them with the Ethics and CSR Code of Conduct;

- > **Provide a contractual framework** for services by clearly indicating the deliverable(s) or service expected as well as the follow-up reports on the actions carried out;
- > **Provide a contractual framework for their remuneration**, which must be reasonable and within the amounts usually charged for the service, including controls on any additional expenses incurred by the intermediary and paid by the Group (disbursement costs, expense accounts and other allowances);
- > **Include an anti-corruption clause in the contract.**

We may also deal with intermediaries who have not contracted with ORPEA but with **a seller** or **a buyer** for example. These third parties must also be identified and reviewed by Compliance [Permanent Cluster Controllers], particularly in the context of development operations.



In practice

An intermediary who suggests that he or she could bribe a public official.

During contract negotiations with an architect in charge of submitting a building permit application to a public authority, the latter indicates that he/she wants ORPEA to cover the costs of gifts and invitations that he may have to spend to ensure that the permit is obtained. What should you do?



You must refuse to accept the payment of incidental expenses for gifts and invitations. The architect who is going to act as an intermediary seems to indicate that he may be using undue advantages in order to obtain the permit, and therefore resorting to corruption.

— and —

Remind him of the zero-tolerance principle applied by the Group which rejects all forms of corruption.

— and —

You must immediately inform your line manager and at the same time alert Compliance following the process mentioned on page 28 of this document. You must also cease all dealings with the third party until you have clarified the request.



Joint ventures

For the purposes of its business, ORPEA may enter into joint ventures with partners. These alliances can result in certain risks, notably if ORPEA is a minority shareholder in the new structure and cannot implement an anti-corruption program, or cannot monitor the effectiveness of such a program.

Consequently, the entry into a relationship with third parties in the framework of a joint venture is particularly regulated. It is necessary to:

- > Perform thorough due diligence;
- > Enter into a contract that provides for the implementation of a compliance program by the joint venture partner and a targeted audit clause in relation to corruption or performance indicator reporting.

Incorporating compliance clauses into the contract

Compliance clauses, and more specifically anti-corruption clauses, are systematically included in contracts with third parties. Anti-money laundering and

anti-terrorist financing clauses may also be added depending on the third party concerned.

Accounting controls

All accounting transactions must be correctly recorded in the accounts. Accounting controls aimed at ensuring that accounting entries do not hide bribery or influence peddling are carried out.

In particular, they are intended to detect transactions without cause or justification and must be established in connection with the anti-corruption risk map.



Donation and sponsorship

A donation consists of financial, skills or material support provided by ORPEA, without seeking direct financial return, to an organization or association carrying out a non-profit activity and which is of general interest.

Sponsorship is a communication technique that consists of providing financial and/or material support to an event (cultural, sporting, etc.), to an individual or to an organization, with a view to obtaining a direct benefit in terms of reputation.

Sponsorship is different from donation because it aims to promote and strengthen the Group's brands.

The ORPEA Group oversees all sponsorship activities. The following rules must be applied to all sponsorship actions:

An approval system based on the amounts involved (Management, Compliance, Donation and Sponsorship Committee);

- > For all operations greater than or equal to 2,500 euros:
 - > A compliance check of the third-party beneficiary under the supervision of Compliance (Cluster Permanent Controller);
 - > A contractualization via the signature of an agreement;
 - > Systematic reporting to Group Compliance;
- > A record of all operations in a centralized file at Cluster level;

The agreement signed between a Group entity and the beneficiary of the sponsorship or donations must at least detail the use that will be made of the donation and include the obligation to report on the use of the funds to ensure that the money has been used for the purposes set out in the contract.

In practice

Using sponsorship to obtain an undue advantage

You are waiting for the approval of a building permit for the extension of a facility; at the end of a meeting, the public official in charge of approving the permit in question mentions that her husband is looking for funding to support the association of which he is the Chairman, and which works with the elderly. What should you do?



You are waiting for a decision on a building permit and since it is impossible to finance the association of the decision-maker's spouse in this context, this could be considered as public bribery.

— and —

You should explain to the public official why it is not possible to fund the spouse's association and remind him or her of the ORPEA Group's zero tolerance rule.

— and —

You should immediately inform your line manager and at the same time alert Compliance by following the process mentioned on page 28 of this document.

For more information

Please refer to the document «Donation and sponsorship policy».

Lobbying / interest representation and support for political organisations

The ORPEA Group's lobbying or interest representation activities must comply with the legal and regulatory requirements in force in each country, and in particular with legislation relating to the prevention of bribery and influence peddling.

If it is decided to use a lobbying consultancy or a company that carries out lobbying activities on behalf of ORPEA, it is imperative to have a due-diligence carried out by Compliance and to formalise contractually:

- 1) the obligation to trace and inform ORPEA at a given frequency of all actions undertaken by the third party, who must be able to justify them,
- 2) the incorporation of compliance clauses, particularly to fight bribery and influence peddling, and
- 3) a remuneration in line with market standards.

In addition, the ORPEA Group maintains a very clear line in terms of support for political organisations and parties by formally prohibiting them regardless of the geographical area concerned.



ORPEA whistleblowing system

A whistleblowing system has been set up, which allows a report to be made concerning a breach of the Ethics and CSR Code of Conduct or a violation of the legal framework, including in particular a suspicion of corruption or influence peddling.

The system can be accessed at the following address: www.orpea.signalement.net

All reports transmitted through the platform will be addressed and treated in complete confidentiality. In accordance with ORPEA's values and the law, any report made in good faith will not be subject to retaliation against the whistleblower.

You can also report a suspicion of corruption through your line manager or through Compliance. If you cannot use the channels described above, you can contact the Group Compliance team (compliancecorporate@orpea.net)



For more Information

Please refer to the document «Procedure for collecting and processing reports».

Sanctions

The ORPEA Group is committed to the principle of zero tolerance for bribery and influence peddling.

Criminal sanctions can be severe (fines and imprisonment), both for the employee(s) at fault and for the ORPEA Group in the event of non-compliance with this Code of Conduct.

Any failure by an employee to comply with this Code of Conduct would consti-

tute misconduct and could be subject to appropriate sanctions and prosecution, in accordance with the law applicable to the employee concerned and the rules of procedure applicable or equivalent within the company. Such sanctions could include, in accordance with applicable law, the dismissal of the employee concerned and claims for damages at ORPEA's initiative.

Warning signs and behaviour to adopt

The ability of each employee to identify the warning signs of bribery and influence peddling enables the right behaviour to be adopted.

Bribery and influence peddling red flags

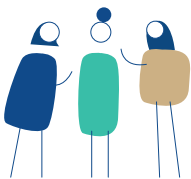
**Behaviours to adopt when faced
with an alarm signal**



Bribery and influence peddling red flags

If any of the following occur, increased caution should be exercised:

- > The use of unusual payment methods or financial arrangements. For example:
 - > A request to make payments to a bank account in a country other than the country where the services were performed and other than the country of the recipient;
 - > A request to make a payment to an account not mentioned in the contract;
 - > A request to make the payment in cash;
- > A third party reluctant to provide information in the context of due diligence;
- > Difficulties in formalising the business relationship with a third party in a contractual manner, as well as in the integration of compliances, particularly with regard to anti-corruption and anti-money laundering;
- > Repeated invitations and gifts or gifts of an unusually high amount;
- > The use of a third party who does not appear to have the necessary skills or resources to perform a service;
- > The specific use of a third party recommended or imposed by a private or public party;
- > Unjustified use of the services of a third party directly or indirectly linked to a public official;
- > The use of a third party for whom little information or references are available;
- > Use of a third party who promises unusually fast results, or who says he can manage everything by himself.



The identification of a red flag should be immediately followed up with further and more detailed checks if necessary.

Behaviours to adopt when faced with an alarm signal

The first thing to do is to analyse the situation by asking simple questions:

- > Does the situation seem legal to you?
- > Does the situation seem to you to be in line with the Group's principles and values?
- > Would you feel comfortable talking about this situation with your colleagues or relatives?
- > Would you be comfortable if this situation was made public within the Group or in the media?



If the answer to any of these questions is «no», the matter should be referred to your line manager and to Compliance Department.

In addition, there are certain behaviours that can protect against the risk of bribery:

- > Never make a decision in haste;
- > Never take a decision alone without first discussing it with your line manager or colleagues;
- > Favour meetings with third parties in the presence of at least one other Group employee;
- > Never make a firm commitment during a meeting and never promise anything;
- > Never accept external meetings that are too repetitive and have no specific purpose.

How to alert and escalation of the alert



If you are faced with an attempt of corruption or are aware of an act of corruption in the course of your duties, you should alert Group or Cluster Compliance as a matter of priority:

Either by direct contact on the phone or by email:

Group

compliancecorporate@orpea.net

France Cluster

conformitefrance@orpea.net

Germany Cluster

compliance@orpea.de

Northern Europe Cluster

compliance.northerneurope@orpea.net

Central and Eastern Europe Cluster

compliance@senecura.at

Iberian Peninsula Cluster

compliance.iberica@orpea.net

Latin America Cluster

complianceLATAM@orpea.net

New Countries Cluster

compliance.cnc@orpea.net

Or through the ORPEA whistleblowing system (see page 23)

orpea.signalement.net

All alerts received by Cluster Compliance, regardless of the channel, must be forwarded to Group Compliance, which informs the Group Management Committee.

Updates and revisions

The appropriateness of updating the Code of conduct is reviewed regularly and in particular after an update of the bribery and influence peddling risk map.

Modifications may be made at any time, particularly to take account of regulatory changes or to incorporate new risks identified, particularly following the updating of the risk map, the receipt of alerts, audit recommendations, etc.

Date of entry into force of this Code: 20 december 2022.

Contacts

If you have any questions about this Code or if you encounter any difficulties, you can contact the Group's Compliance Department at

compliancecorporate@orpea.net,

or the person in charge of Compliance in your Cluster.



Private hospitals - Nursing homes - Assisted-living facilities - Home care services

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