

Code of Conduct

Ethics and Corporate Social Responsibility

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Introduction

Message from the Chief Executive Officer

Editorial by the Compliance and CSR departments

All you want to know about the Code of Conduct

Whom is this Code of Conduct intended for?

How is this Code of Conduct used?

Where can I find the documents mentioned in this Code?

Who do you contact in case of questions/doubts?

Who can you alert in confidence about breaches of this Code?

What are the sanctions for non-compliance with this Code of Conduct?



Message from the Chief Executive Officer

Our mission, serving the most vulnerable, represents an immense responsibility. About 270,000 patients and residents choose to place their trust in us each year, putting their health and well-being in our hands and importantly, putting their health and well-being in our hands, and those of our 76,000 employees, 76,000 “forces” to whom we are giving the means to do their jobs well while preserving their health.



Our commitment to them must be wholehearted to honor their trust.

This can only be achieved if all the conditions are in place to carry out our duties in a serene and transparent manner, while respecting the dignity of everyone.

Our jobs are profoundly human. Each of our gestures, each of our actions has a direct impact on the residents and patients we welcome or with whom we interact.

This Code of Conduct has been designed to provide a frame of reference that reaffirms our values, our ethical principles, and our commitment to Corporate Responsibility.

I wish to emphasize the importance I attach to ethics in all aspects of our business. The rigor with which we will apply the strictest principles throughout the world and the respect of our commitments in terms of human, social and environmental responsibility will be key to achieving our ambition and making our Group a reference in the health and senior care sector, in line with the increasingly strong expectations of society.

I invite you to take ownership of this Code, which is designed to guide our daily choices, our decision-making processes, and our interactions with all our stakeholders: residents, patients, beneficiaries and their loved ones, public authorities, professionals, and suppliers. I know that I can count on you to be fully involved in this ethical approach. It is also an evolutionary process, since this code must be based on our practices, evolve with them, and allow us to always aim for the highest level of quality possible.

I would like to thank you for the values and professionalism that you apply every day in your facilities as well as in your departments, for the benefit of the most vulnerable.

It is by moving forward together in this common direction that we will be able to give full measure to our shared mission.

Laurent GUILLOT

Our jobs are profoundly human. Each of our gestures, each of our actions has a direct impact on the residents and patients we welcome or with whom we interact.

Editorial by the Compliance and the CSR departments

As a player in healthcare, the words respect and integrity take on a whole new dimension within the ORPEA Group, and we must always keep in mind that ethics and corporate social responsibility concern each and every one of us, regardless of our position in the company and the situations we may face.

To this end, we have drafted this Ethics and Corporate Social Responsibility Code of Conduct, which will enable each employee of the Group as well as all our stakeholders (patients, families, employees, suppliers, partners, the environment, etc.) to better understand what is expected of them in order to adopt, in all circumstances, a behaviour of integrity and responsibility.

This Code of Conduct has been designed as a practical guide, in which we have gathered the essential principles of good conduct that should be observed by all, as well as concrete examples of everyday situations, in order to guide your reflections in order to make the best possible decision, always with accuracy and objectivity.

This Code of Conduct is essential, both in terms of CSR with the transcription of our commitments, and in terms of ethics and prevention of corruption. Therefore, it is vital that everyone follows the principles set out in it and sets an example in their daily behaviour and actions.

The issues addressed in this Code are complex and fluid, which can lead to uncertainty. Such uncertainties are perfectly healthy and legitimate, and that is why we believe in the local network that is deployed within the Group, in particular via our respective teams, which are at your service, just like we are. Therefore, we invite you, if necessary, to contact the Compliance correspondents who will be able to give you all the necessary advice and assistance.

All you want to know about the Code of Conduct

Whom is this Code of Conduct intended for?

Our position as a global leader in dependency care gives us a great responsibility that we wish to assume on a daily basis.

Taking on this responsibility means that we are extremely vigilant not only in meeting our quality standards across the Group, but also in upholding our values and ethical principles.

The Code of Ethics and Corporate Social Responsibility applies to all Group employees, permanent and temporary, salaried or managerial workers, in all the countries in which the Group is based.

Similarly, we expect all our partners, suppliers and service providers to behave

ethically in accordance with the spirit of this Code, so that our values are unequivocally disseminated beyond the Group.

It is up to each of us, and particularly to managers, to pay the utmost attention to this Code and to take ownership of its principles, so that the values on which our Group was founded continue to contribute to its sustainable development.

It is our duty to live up to the trust placed in us.



A responsibility shared by all

This Code is given to each employee when they join us and is available on the Group's institutional website.

How is this Code of Conduct used?

We recognise that we can always be faced with situations that are not straightforward and that we should regularly question our actions and arbitrate our choices.

The purpose of this Code is to set out the main principles to be respected, to give an outline of the behaviour that we want, in any case, and to be ethical and responsible.

Each of us should therefore be able to read it and refer to it whenever we have a question.

Of course, this Code is not intended to cover all situations that may arise. Therefore, if you are faced with a situation where you are unable to find an answer to your concern in this Code, we encourage you to systematically ask yourself the 5 questions below in order to adopt ethical and responsible beha-

viour in all circumstances. If one of your answers to any of these questions is yes or if you have any doubts, you should immediately refer to the competent persons [see “Whom do you contact in case of questions/doubts”] so that you can be assisted in your choices.

Indeed, it is always the principles of integrity, respect and fairness that must guide the conduct of all of us.

For the strictest application of these principles, when local legislation is stricter than the stipulations of this Code, local legislation must be applied; conversely, when the stipulations of the Code of Conduct are stricter than the local legislation, the Code applies. In the event of any inconsistency between the Code of Conduct and local legislation, local legislation shall prevail.



Questions I need to ask myself

- > Is it illegal?
- > Does it contradict the principles of this Ethics and Corporate Social Responsibility Code of Conduct?
- > Could my action have a negative impact on residents/patients/beneficiaries, employees and any other stakeholder (partner, supplier, community, etc.)?
- > Is my action guided by my personal interest?
- > Would I be uncomfortable if my actions were made public both internally and externally?

Where I can find the documents mentioned in this Code?



The documents mentioned in the inserts entitled “for further information” are available to employees of the Group headquarters in the space dedicated to

the Group Standards. Each cluster must make those documents available to all employees through their own internal communication channels.

Who do you contact in case of questions/doubts?

If employees have any questions or doubts, they can contact their superiors,

Human Resources, Legal Affairs, CSR or Compliance teams.

Who can you alert in confidence about breaches of this Code?

Every employee may use the ORPEA whistleblowing platform (www.orpea.signalement.net), in complete confidentiality, to report any breach of this Code. The system is accessible 24/7. Employees

who report a breach in good faith will not be subject to retaliation. For more information on the system, please consult the procedure for collecting and processing alerts available on the platform.

What are the sanctions for non-compliance with this Code of Conduct?

Failure to comply with this Code may result in sanctions for the Group, its managers and employees. The Group has zero tolerance for breaches of the ethical principles set out in this Code.

Any non-compliance by an employee would constitute a breach and could be subject to appropriate sanctions and prosecution in accordance with the law applicable to the employee concerned and the company’s applicable regulations.

Such sanctions could include, in accordance with applicable law and rules of procedure, dismissal on disciplinary grounds and claims for damages at ORPEA’s initiative, even if the failure to comply with the rules were detected by the Group itself.

With regard to our partners, any breach of a principle of the Code could lead to the termination of all business relationships and claims for damages at ORPEA’s initiative.

Our ORPEA spirit

Our ethics, a condition for sustainable and collective success

People, at the heart of our commitment

Our values

Our frame of reference



Our ethics, a condition for sustainable and collective success

Since its creation in 1989, the ORPEA Group has built its development on a strong culture and shared values.

We are deeply convinced of the need to know, share and unite our teams around these values.

These values are the foundations that define, connect and strengthen us on our way to responsible and sustainable development.

This need is very clear for a Group like ours, which places People at the heart of its identity and vocation.



People, at the heart of our commitment

At ORPEA, we have always taken care of People on a daily basis by putting them at the heart of all our concerns, by placing their development at the centre of all the actions we undertake.

A will that we translate every day into concrete actions, with the aim of acting as closely as possible to the expectations and needs of the people who have chosen to place their trust in us:

- > Our employees, whom we support to enable them to develop both professionally and personally.
- > The residents, patients, families and loved-ones whom we treat with the greatest respect by assisting them towards gaining greater autonomy, by seeing beyond their vulnerability, by giving them the means to share their stories, their desires and their projects.

- > The ecosystem which we are a part of and which we want to be open, lively and communicative, in particular by facilitating interaction with local players, local health professionals, schools, associations, shopkeepers, neighbours, etc.

Furthermore, as a major player in the health sector, we have a responsibility towards the environment in which we operate. To control our impact on the environment, we design and run our facilities as responsible places. We should leave a more virtuous footprint on our planet and allow everyone to live in a more sustainable environment.



ORPEA is a Group that is committed to People on a daily basis

To help change the way people look at those in dependency
To enhance the value of the jobs carried out by our teams
And thus contribute to building a more inclusive society where everyone finds their rightful place.



Our values

OUR TEAM IS 76,000-STRONG!

**A commitment to humanity,
Taste for life,
Thirst to learn,
Spirit of mutual aid...**

These four values are ours: they reflect our origins and lay the foundation for our future. I am proud to share them with you today. These values are the result of a long collaboration and they support our Refoundation Plan. They reflect the community we want to build together to serve our mission: to care for our patients, our residents, our other beneficiaries and their families.



A commitment to humanity

Because we reveal our humanity when caring for the most vulnerable.

- > **Our business is an individual and collective commitment** to the service of those who are weakened. They need all our help to preserve their spirit, their dignity and their individuality.
- > **Each of us takes personal responsibility** for upholding our ethical principles with empathy. Every act of care, every gesture, every word is a testimony to our commitment to others, a sign of our highest respect for who they are.



Taste for life

Because to care for others is to cultivate the desire to live.

- > **To take care of and support a weakened person is to help them get back to their lives or to help them to feel more alive.** It's a path that we take hand in hand with every patient, every resident, every family.
- > **We pass our vitality** to those we care for. We keep their thirst for life going with our positive attitude and by activities or projects that align with each individual.
- > **We can measure the impact of our care through their smile.**



Thirst to learn

Because the more we learn, the better we care.

> **It's a shared state of mind while we practice our trade**

We are always looking for ways to improve our practices, listening to meaningful contributions from the most useful sources: doctors, carers, and all those involved in the hospitality and well-being, as well as patients, residents and their families.

> **It's our collective responsibility as a Group**

Our occupation brings together multiple disciplines that are constantly evolving as new discoveries are made, whether in technology, culture, the human and social sciences, or new initiatives in the field. In every facility and everywhere we operate, our quality of care and support is based on the most advanced knowledge.



Spirit of mutual aid

Because helping others begins with helping each other.

> **It's the way we work**

We make shared resources available between facilities. We help each other in every team. We can count on each other, through trust.

> **Solidarity, a priority in society**

To face the immense challenge of taking care of and supporting our weakest individuals, collaboration between public bodies, non-profits, and the private sector is a must.

We participate in this effort at every level.



Our frame of reference

The ORPEA Group is committed to respecting the laws and regulations in force in the countries where it operates and expects the same commitment from its employees.

The Group is also committed to ensuring that the rules of ethics are respected by the health professionals working with the residents and patients in its facilities, as well as with all the people being cared for by our teams at home.

The principles set out in this Code are based in particular on the principles of the following international Conventions:

- > The 1948 Universal Declaration of Human Rights;
- > The fundamental Conventions of the International Labour Organisation;
- > The OECD Guidelines for Multinational Enterprises;
- > The United Nations Global Compact;
- > The UN Guiding Principles on Business and Human Rights;
- > The UN Convention against Corruption;
- > The WHO Principles;
- > Laws relating to the duty of care;
- > The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- > The French “Sapin II” law of 9 December 2016, which requires the implementation of measures to prevent and detect cases of bribery and influence peddling in all countries in which the Group operates.



Our ORPEA commitments

Ethics, as a company that puts People at the heart of its concerns

Commitments as an employer

Citizenship, as a committed player in territories and society

Integrity in the conduct of business



Ethics, as a company that puts People at the heart of its concerns

Everyone deserves respect for their person and dignity, and should treat others as they wish to be treated themselves.

It is by feeling respected and recognised in our humanity and dignity that each of us gives the best of ourselves and maintains quality relationships with other individuals, whatever their position.



Principle 1

Respecting the rights and dignity of people

Principle 2

Ensuring health, safety and well-being in our facilities

Principle 3

Respecting the privacy of individuals and their personal data

Principle 4

Maintaining trust-based relationships with the families and loved-ones

Principle 1 /

Respecting the rights and dignity of people

We pledge to:

- > **Respect and promote Human Rights;** we refer to the Universal Declaration of Human Rights of 10 December 1948, the United Nations Guiding Principles on Business and Human Rights of 16 June 2011, and also to all the Charters relating to people hospitalised and/or accommodated in facilities for dependent elderly people and/or cared for at home;
- > **Make every effort** to ensure that our activities do not directly and/or indirectly violate Human Rights;
- > **Comply with the law** and diligently ensure that the practices of our suppliers and partners are also compliant with respect to human rights.

Because of our global presence, we pay particular attention to:

- > The subjects covered by the **Fundamental Conventions of the International Labour Organisation** (prohibition of undeclared work, child labour, forced labour, non-discrimination, respect for freedom of association and collective bargaining);
- > The promotion of **diversity**;
- > The fight against all forms of **discrimination**;
- > **Women's rights**;
- > Respect the right of local populations to make use of their **natural resources**;
- > The right to **health**.



We must:

- > **Give the utmost consideration and attention to all persons** regardless of their physical or mental condition, culture, ethnic or social origin, religion, political opinions, sexual orientation or age;
- > **Behave in a respectful, courteous and benevolent manner** towards all our interlocutors, internal or external, whoever they may be;
- > **Consider the resident/patient as an active participant in his/her life and health**, provide him/her with clear and fair information to this effect and respect his/her wishes;
- > **Adopt the principles, procedures and reflections on good treatment/ethics** and, if necessary, discuss them with our colleagues and/or our superiors and/or the facility's ethics/good treatment officer and/or contact the Group's Ethics Committee*;
- > **Scrupulously respect the Charters** to which the Group adheres and also those that the Group has drawn up.

We must not:

- > **Tolerate behaviour that has the purpose or effect of violating a person's dignity** or creating an intimidating, hostile or offensive daily environment;
- > **Have a discriminatory attitude** and/or to refuse to take care of and/or welcome a person because of his/her social origin, culture, disability, religion, etc.;
- > **Perform a medical act and/or treatment without having obtained the free and informed consent of the resident** and/or patient [except in specific cases covered by the regulations];
- > **Leave room for any form of moral, physical, verbal or sexual harassment.**



Practical cases



A dependent resident refuses to receive the hygiene care necessary to maintain their comfort and dignity.

What do you do?

Any situation of refusal of care must be analysed and discussed in a multidisciplinary team. Even if these refusals can be difficult to accept, the team must try to promote dialogue and avoid confrontation in order to always seek the solution that will best guarantee the dignity of the resident. This approach will lead to proposals that are potentially more acceptable to the person if they have the satisfaction of having been heard.

A new carer is mocked by his/her colleagues because of his/her accent.

What do you do?

Such actions should not be tolerated, but rather condemned and those involved should be urged to stop such malicious acts. If the situation does not change, the superiors must be notified. Serious breaches can lead to dismissal.

A young care assistant is subjected to inappropriate remarks and gestures by his/her superior.

What do you do?

This type of behaviour must not be tolerated, furthermore, it must be condemned and those concerned must be encouraged to stop such malicious acts. If the situation persists, the management must be notified. Any breach may lead to disciplinary action as provided for in the rules of procedure.

* The Group's Ethics and Scientific Committee

In 2015, the Group created the International Scientific & Ethics Council (ISEC) with a dual mission:

- To build and disseminate a culture of clinical ethics, in particular by supporting teams in dealing with ethically problematic situations,
- To analyse, evaluate and promote clinical research and healthcare innovation programmes within the Group.

This Committee can be called upon at any time by the teams in the field to support them in their ethical reflection, particularly in terms of good treatment.

Principle 2 / Ensuring health, safety and well-being in our facilities

Health, safety and well-being have always been a major concern in our facilities, whether for the accommodated residents/patients, for the employees who work there, or for the families, loved-ones and partners.

We pledge to:

- > **Deploy a comprehensive quality and risk management approach** within our facilities, based on the most demanding health and safety standards and regulations,
- > **Provide living, care and working environments** that promote the well-being of residents, patients and staff.



We must:

- > **Comply with the written procedures available in our facilities**, which constitute the basis for quality and safe care and a healthy and safe working environment for our staff;
- > **Ensure that our decisions and actions** do not put ourselves or others at risk by weighing the benefits/risks before taking action;
- > **Accept to question our operating practices**, regularly audit our working methods and take part in a continuous improvement process by undergoing the training courses offered by the Group;
- > **Know and control the risks** inherent in our activities or our environment;
- > **Report to our management or staff representatives** any accident or undesirable event or behaviour that poses [or is likely to pose] a significant health or safety risk.

We must not:

- > **Apply a written procedure that we do not understand** [in this case, we should refer to our superiors] and/or ignore an instruction and/or a rule;
- > **Fail to report incidents and/or adverse events**, even if we believe that they do not represent an immediate danger;
- > **Carry out tasks and/or actions that are not within our competence** and for which we are not qualified;
- > **Think that if it is not our responsibility, we are not responsible**: safety and well-being are everyone's responsibility.

It is important that each person who notices a problem can report it via the adverse event form system in place within the facility. The safety of the residents and, more generally, of all the people who are cared for and/or work in the facilities is at stake.

The reporting and analysis of undesirable events – whether proven or narrowly avoided – is an integral part of the safety culture to which we must all pay attention. Transparency regarding errors or problems, a fundamental component of any risk management and quality improvement approach, allows us to learn from our mistakes and, through the sharing of lessons learned, from those of others. Within the Group, we consider mistakes to be positive because they allow us to improve and challenge ourselves. You should not fear that your colleague will be punished unless, of course, they were deliberately trying to do harm.

Reporting undesirable events allows us to work on the causes and prevent the occurrence of any new incident that could have had more serious consequences.

Practical cases



I work nights with a colleague and he/she asks me to give an injection to a patient to catch up on their doses. However, I am not normally authorised to carry out this type of work. What should I do?

It is imperative that you tell your colleague that you are not qualified to carry out this task, that you cannot risk endangering people's safety, and that it is better for him/her to be a bit late, which he/she will be able to explain to the patients, rather than taking a risk.

A colleague wants to enter a work area in our building to retrieve an object. This area is off-limits, but does not appear to be dangerous. What should I recommend?

All employees must strictly adhere to the safety instructions. By violating this prohibition, your colleague would be acting recklessly and putting himself/herself in danger. An alternative solution must therefore be sought with the line manager or site manager.



Principle 3 /

Respecting the privacy of individuals and their personal data

As a result of our activity, we process personal data, some of which are sensitive data (e.g. health data). However, our residents, patients, people assisted at home and their families or our employees have a right to privacy and respect of their personal data we process.

We pledge to:

- > **Ensure strict compliance with existing legislation on privacy** and data protection, in order to guarantee everyone control over their data (access, rectification, erasure, limitation, opposition, portability, etc.);
- > **Respect the confidentiality of the data** and use it fairly for a defined and legitimate purpose and to keep it only for as long as necessary for that purpose.
- > **Review each new processing activity of personal data** to ensure legitimacy and legal compliance;



We must:

- > **Ensure that the individuals on whose behalf we collect personal data are informed** of the type of personal data we collect, how we intend to use it and how they should contact us if they have any questions;
- > **Limit the distribution of personal data to authorised persons only**, to the strict extent necessary and for necessary period;
- > **Secure the transmission or provision of personal data to a third party** [processor, partner, etc.] by means of a contract that includes clauses relating to the protection of this data;
- > **Protect the confidentiality of personal data**, in particular by ensuring that their storage is properly secured [password management, protection of USB keys, encryption of hard drives, etc.].

We must not:

- > **Collect “sensitive” data** [health status, ethnic origin, sexual preference, political opinions, religious beliefs, etc.] without the consent of the individuals [except in case of legal obligations];
- > **Reuse personal data for a purpose other than that or those stated** to the person who provided their data;
- > **Retain information** longer than the legal or professional purpose for which it was obtained.



Practical cases



A friend asks me for the mobile phone numbers of my colleagues and residents/patients in order to send them an offer for his business located near the residence/clinic where I work.

I have access to them, can I provide them?

You have not been given access to such data for this purpose and the processing you may carry out is limited to the strict framework of your missions. You are therefore not allowed to pass on these numbers to your friend.

You may talk to your colleagues outside working hours, but you must not pass on any personal data about residents/patients.

My USB stick was stolen and it contained personal data about patients. It was not encrypted but I don't see what the "thief" could do with it.

Such data should not have been on an unencrypted USB key. ORPEA is exposed to risks (legal/reputation) and the persons mentioned may suffer harm (identity theft, etc.). It is essential to respect internal rules on encryption and, if possible, to anonymise files. If encryption is not possible, no company data should be copied to a key. You must report the facts to your superiors and to IT support, indicating as precisely as possible what data was contained on the key.

I would like to send one of my colleagues a surprise gift. I asked Human Resources to give me his/her home address, but they told me it was impossible because it would be an "invasion of his/her privacy"! Isn't that a bit over the top?

The attitude of HR is quite appropriate: personal data should be kept strictly confidential. HR cannot make exceptions.



Further information

For the use of the Group's IT resources, please refer to the Group's IT Charter.

Principle 4 /

Maintaining trust-based relationships with the families and loved-ones

Because we make the well-being of our residents and patients, as well as those assisted at home, our absolute priority, we are fully aware of the place and role that their families and loved ones can play at this time in their lives when they are temporarily or more permanently weakened or losing their independence.

While respecting the free choice of the resident/patient and each person's position,

We are committed to:

- > **Involving families and loved-ones by collecting their opinions**, taking their wishes and concerns into account and considering them as “full partners” in order to provide the most appropriate care for the residents/patients/beneficiaries;
- > **Maintaining a trust-based dialogue with the loved ones** and ensuring that relevant, clear and accessible information is provided.



We must:

- > **Maintain a constructive and proactive dialogue with the families and loved-ones** of the persons in care, based on mutual listening, respect, benevolence and empathy;
- > **Be open and available** to take into account the richness and diversity of others' points of view;
- > **Implement all means to promote and maintain the quality of exchanges** and to contribute to reassure families and loved-ones while respecting the wishes of the residents or patients.

We must not:

- > **Deny a problem, complaint or claim** from a family, carer or trusted person;
- > **Fail to inform our superiors** if a relationship problem persists;
- > **Refuse to communicate with loved-ones;**
- > **Favour one of the members of the same family** with regard to the patient or resident being cared for.



Practical cases



A family wants to complain about something that doesn't suit me because if the change they suggest is accepted, I will be forced to implement it and I don't want to. What do I do?

You should not prevent a family member from expressing themselves, whatever the subject. As part of our continuous improvement process, we must promote constructive dialogue with the people in our care and their families, who are invited to express themselves and to participate in the life of the facility, for example as part of committees organised with the families or their representatives. This open dialogue will make it possible to assess the request and analyse the possibility of responding favourably or not.



A disoriented and wandering resident had a fall; during the presentation of his/her personalised project to his/her family, the latter asked us to restrain him/her, which we refused after having assessed, as a team, the benefit/risk of setting up a restraint

for a wandering person and the potential risk of falling. As a matter of principle, we should inform the family of this fall, but we fear a strong reaction from them. How should we act?

In all circumstances, we owe fair and transparent information to the families who have entrusted us with their relative

and placed their trust in us. We must therefore call them to inform them of this fall and, at the same time, we must re-examine and reassess the benefit/risk for this resident as a team.

Commitments as an employer

Our employees work in professions that respond to a mission of public utility, to a societal challenge: to take care of the physically and/or psychologically vulnerable.

We want to create a sense of pride in all our employees, driven by doing a job that makes the lives of residents, patients and relatives easier.

We want to help them to develop, to help them, if they so wish, to progress, to increase their skills, to obtain new qualifications and we are committed to building stimulating and rewarding career paths that meet both their professional and personal aspirations.

Our employees are the driving force behind our responsible and societal commitment.



Principle 5

Promoting social
dialogue

Principle 6

Providing training and
support, encouraging
career development

Principle 7

Promoting and
respecting Equality,
Diversity and
Inclusion

Principle 5 / Promoting social dialogue

We know that any organisational change and/or new project can have an impact on the men and women who work in our institutions. Because we care about their well-being,

We pledge to:

- > **Establish and maintain an open and constructive social dialogue** with all employees and their representatives in order to give everyone the opportunity to make their voice heard;
- > **Systematically seek the best consensus** and otherwise limit any potential risk of misunderstanding or even conflict.



We must:

- > **Enable each employee to have access to clear information** on his or her rights, duties and the benefits to which they are entitled;
- > **Conduct an annual interview with each employee** in order to take stock of their professional situation, and discuss potential areas of work, their workload and their aspirations;
- > **Set up regular discussion and information meetings** to enable staff to give their point of view and participate in the life of their facility, particularly when organisational changes are planned.

We must not:

- > **Consider that social dialogue is useless** and fail to create the right conditions for exchanges with employees.

Practical cases



In order to take care of the residents and patients, I decide to modify the working hours and days of my teams.

Although it is possible to change the working days and hours under certain conditions and in particular according to the rules of the labour law applicable in the country, we have to explain to the teams beforehand the reasons which led us to carry out these changes, collect the opinions and concerns of the teams and find the best solution for the residents and patients as well as for the teams.



Principle 6 /

Providing training and support, encouraging career development

We want every employee to feel valued and free to learn and grow within the company.

We pledge to :

- > **Maintain a working environment that is conducive to motivation and the expression of particular talents** so that not only does everyone feel respected with their differences and particularities but they also feel that they are an active participant in their own career and that of their colleagues, by acting on the transmission of know-how, the integration of new arrivals, etc.
- > **Promote the professional development** of all the Group's employees through an HR policy focused on training, apprenticeships and internal promotion.



We must:

- > **Enable everyone to develop their skills** by giving them access to all training tools, by customising these tools to their needs and by systematically mentioning training and development opportunities in the annual performance review;
- > **Encourage collective learning** by inviting each employee to share their experiences and know-how with their colleagues;
- > **Encourage everyone to show initiative, creativity and progress** within the Group, regardless of their initial background.

We must not:

- > **Discriminate in the day-to-day management of employees**, in particular with regard to access to training, remuneration or career development;
- > **Consider that some employees would not have the opportunity to develop** within the Group.

Practical cases

A very successful care assistant told me that he/she wanted to progress within the facility and the Group. However, I am unsure if this is in the interest of the Group as he/she is doing his/her job very well in his/her current position.

What do I do?

The investment and progress of employees should be rewarded through internal promotion, without any predetermined “glass ceiling”. For example, we are proud of the career paths of employees recruited as nurses who have gone on to become Facility Directors and/or trainee helpers who have gone on to become care assistants.



Principle 7 /

Promoting and respecting Equality, Diversity and Inclusion

We are convinced that the diversity of profiles constitutes the richness of the company and it is up to us to recognise and value individual differences for the benefit of better collective performance while respecting each individual.

We pledge to:

- > **Promote diversity** in terms of gender, origin, age, etc.
- > **Promote equal opportunities** for every employee or job applicant and ensure that only personal skills, experience and attitudes are taken into account, particularly in relation to pay [equal pay for equal work].
- > **Encourage all managers and employees to be open-minded** in order to promote the professional integration of people who have difficulty accessing employment, particularly people with disabilities;



We must:

- > **Support and promote the Group's commitment** to diversity and inclusion;
- > **Respect others, fight against bias and reject prejudices** about the opinions, appearance or attitude of our employees.

We must not:

- > **Discriminate in hiring or promotion** on the grounds of age, gender, religion, disability, etc

Practical cases



Does the importance of diversity to the Group mean that I should focus on hiring women or people from ethnic minorities?

No, we hire on the basis of skills, experience and interpersonal skills. You must therefore choose the best candidate for the job. Moreover, diversity is not limited to the examples you mentioned. This also applies to other categories that could potentially be disadvantaged, such as disabled and/or older employees.

I feel uncomfortable when I hear comments about a gay colleague; what should I do?

You cannot tolerate this kind of behaviour: homophobia is totally unacceptable. Each of us has the right to respect for others regardless of their sexual orientation. You should therefore tell your colleagues that their attitude is unacceptable and that they should stop this type of behaviour immediately. Otherwise, you should talk to your superiors and/or the HRD.

Citizenship, as a committed player in local areas and society

We are committed to being a good corporate citizen, socially responsible and engaged with the communities in which we operate.

We are a private Group that serves the general interest by responding to the health needs of local areas and by contributing, through the activity of our facilities, to the economic and social development of these local areas while seeking to reduce our impact to preserve the Planet.



Principle 8

Acting locally and contributing to the development of territories

Principle 9

Limiting our ecological footprint

Principle 8 /

Acting locally and contributing to the development of territories

We want all our facilities to be fully integrated into the local areas in which they are located.

We pledge to play an active role in the community, by:

- > **Participating, directly or indirectly**, in the creation of permanent and non-relocatable jobs;
- > **Participating in the creation of new neighbourhoods** and land-use planning, while limiting the environmental impact;
- > **Cultivating a supportive and inclusive approach** that helps to combat the isolation of the elderly and/or vulnerable;
- > **We are involved in the local community** by supporting general interest projects that promote health and education.

Furthermore, our position on politics is clear and must be scrupulously respected: **the ORPEA Group is apolitical and does not support any party or politician** in the countries in which it operates.

Lobbying is a constructive and transparent contribution to the development of public policy on issues relevant to the Group's activities. **The Group's lobbying activities comply with the legal and regulatory provisions in force** in each country and in particular with **legislation relating to the prevention of corruption**.

We must:

- > **Develop local initiatives** that strengthen social cohesion and links, such as exchanges between children and residents in facilities and/or with associations of carers, patients within our clinics, etc.;
 - > **Open our facilities to the outside world** and allow exchanges with the City; our Group may be global, but our day-to-day actions are local;
 - > **Integrate the local ecosystem** and actively participate in the health-related functioning of the local area in which we are located by signing agreements with care partners;
 - > **Encourage the involvement of the facilities** in solidarity initiatives.
-

We must not:

- > **Remain inward-looking** and keep our institutions closed to the outside world;
- > **Take political sides on behalf of the Group** or allow confusion to arise between our personal political views and commitments and the Group;
- > **Use the Group's financial and material resources** for the interests of a political party;
- > **Force employees or partners** to participate in patronage projects supported by the Group or the facility;
- > **Influence or attempt to influence** our residents, patients and clients as regards local, regional or national elections.



Practical cases



A friend who is involved in a political campaign asks me if the ORPEA Group can support this campaign, and in particular get my facility involved by putting up leaflets and posters in the entrance hall. Is this possible?

The political neutrality applied by the ORPEA Group is incompatible with its involvement in a political campaign. Indeed, our Group's vocation is to provide quality care to all, regardless of their political orientation, which implies remaining neutral.

I was contacted by an association that works in the field of health with disadvantaged people. Is it possible to carry out a patronage action with this association?

Yes, patronage is possible, but you must contact the ORPEA contact person (Foundation, Regional Directorate, Communications, etc.) who will help you set up this patronage action.

A local politician wants to come and campaign in the facility, with residents/patients and employees, in the presence of the media.

The ORPEA Group's policy of neutrality is incompatible with this initiative. Simply state that you must preserve the privacy of life and care / confidentiality of hospitalisation of the patients, as well as a serene atmosphere necessary for the well-being of the vulnerable people you are caring for, and that such a visit with the media is not compatible with these commitments to the residents/patients. On the other hand, you can specify that the doors of the facility are always open to local politicians, outside the electoral context, and that you would be very honoured to receive them for a lunch or an event, as the residents are always happy to welcome and discuss with the local elected representatives.

During the sale of a piece of land belonging to a municipality, one of the public officials in charge suggested that I make a donation to an association chaired by the mayor's wife. Should I accept it?

No, in the context of the sale of land, it is not possible to finance this association. To finance it would be to introduce a quid pro quo for the sale of the land and could be considered as corruption. It should therefore be refused politely and firmly.



Principle 9 / Limiting our ecological footprint

Conscious of our responsibility towards present and future generations, we intend to limit the impact of our activities on the environment, combining economic performance and environmental preservation for both existing and future buildings.

We are particularly committed to the principle of sustainable health: ensuring equal quality of care by using resources in a controlled manner and avoiding waste.

We pledge to:

- > **Use where possible and promote** any device to control energy consumption and reduce CO₂ emissions;
- > **Save water resources;**
- > **Build sustainable facilities** and ensure their integration into their ecosystems, taking into account the preservation of biodiversity;
- > **Reduce the amount of waste** and ensure its proper treatment.



We must:

- > **Ensure that we limit our water and energy consumption** [without compromising the comfort of our residents/patients] and set up regular monitoring;
 - > **Raise the awareness of all players** in respecting the environment and responsible practices by undergoing the training courses on eco-gestures offered by the Group;
 - > **Reduce unnecessary travel** and use alternative means of communication such as video conferencing;
 - > **Propose and report to one's superiors** and/or to the competent department, any project or initiative likely to limit our ecological footprint and/or likely to generate negative environmental impacts;
 - > **Integrate our responsible commitments** in our relations with third parties, particularly in the context of our construction and/or renovation projects.
-

We must not:

- > **Ignore the recommendations** made to us regarding environmental protection;
- > **Deliberately withhold or conceal information** about an action that has had or may have a negative impact on the environment;
- > **Think that what we do on our own scale is useless.** Indeed, it is the involvement of each individual that is the driving force behind collective success.



Practical cases



While the air conditioning is on in the premises, I notice that windows are regularly left open by some of my colleagues. How do I react?

You are rightly aware that this leads to a waste of energy resources. Not only can you alert your colleagues verbally when the opportunity arises, but you can also inform your superior so that he or she can circulate guidelines on the subject.

During the construction or renovation of an ORPEA building, I noticed that the waste from this work was being disposed of in an unauthorised dump. What should I do?

These practices are not acceptable; it is the Group's image and reputation that are at stake. You should verify that contractual clauses on this topic are included in the contract and remind the supplier in writing of its commitments or make an amendment if it is not included. Should the supplier fail to resolve this and behave responsibly, you will have to terminate all business relations with that supplier.



Integrity in the conduct of business

The integrity of the ORPEA Group is based on the integrity of each employee, and also on the actions and resources set up by the Group to promote it. Everyone must demonstrate integrity in their day-to-day work, both internally and towards external parties.

Principle 10

Banning corruption (bribery and influence peddling), regulating gifts and invitations and preventing conflict of interest

Principle 11

Actively collaborating with public authorities

Principle 12

Respecting our suppliers, service providers, partners and competitors

Principle 13

Providing true, accurate and fair information to our shareholders, investors, lenders as well as to the public and preventing insider trading

Principle 14

Using the resources made available by the Group in an ethical and responsible manner

Principle 15

Protecting the image and reputation of the Group

Principle 16

Ensuring / guaranteeing the confidentiality of information



Principle 10 /

Banning corruption (bribery and influence peddling), regulating gifts and invitations and preventing conflict of interest

Corruption is defined as an abuse of entrusted power for private gain. In this Code, corruption refers to bribery and influence peddling which are two forms of corruption. Corruption is contrary to our values and to the respect of the trust placed in us by our residents, patients, clients and their families, on the one hand, and the public authorities with whom we collaborate, on the other. The requirement of probity also makes it necessary to control gifts and invitations and situations of conflict of interest.

Bribery consists in promising, offering, giving (active corruption), soliciting or accepting (passive corruption), directly or indirectly (through a third party or an intermediary), an undue advantage (financial or otherwise) so that a person, public or private, performs, refrains from performing, delays or accelerates the performance of an act in the performance of his duties or in violation of his responsibilities (legal, contractual or professional obligations).

Beware, the mere fact of promising an undue advantage is already an act of bribery.

Influence peddling is very close to bribery; it consists, for a private or public person, in soliciting or accepting an undue advantage in order to use his or her influence, real or supposed, to obtain distinctions, jobs, contracts or any other favourable decision from a public authority or administration.

Similarly, **facilitation payments** are classified as corruption. These are small sums of money paid to public officials to expedite administrative procedures. They are banned by the Group.

In addition, the Group regulates **gifts and invitations** given and received in the context of business relationships with external third parties. Care should be taken, as gifts and entertainment can be a vehicle for corruption or influence peddling if misused.

The Group has also put in place a policy for the prevention and declaration of **existing or potential conflicts of interest**, which arise whenever an employee has personal interests that may conflict with the interests of the Group.

We pledge to:

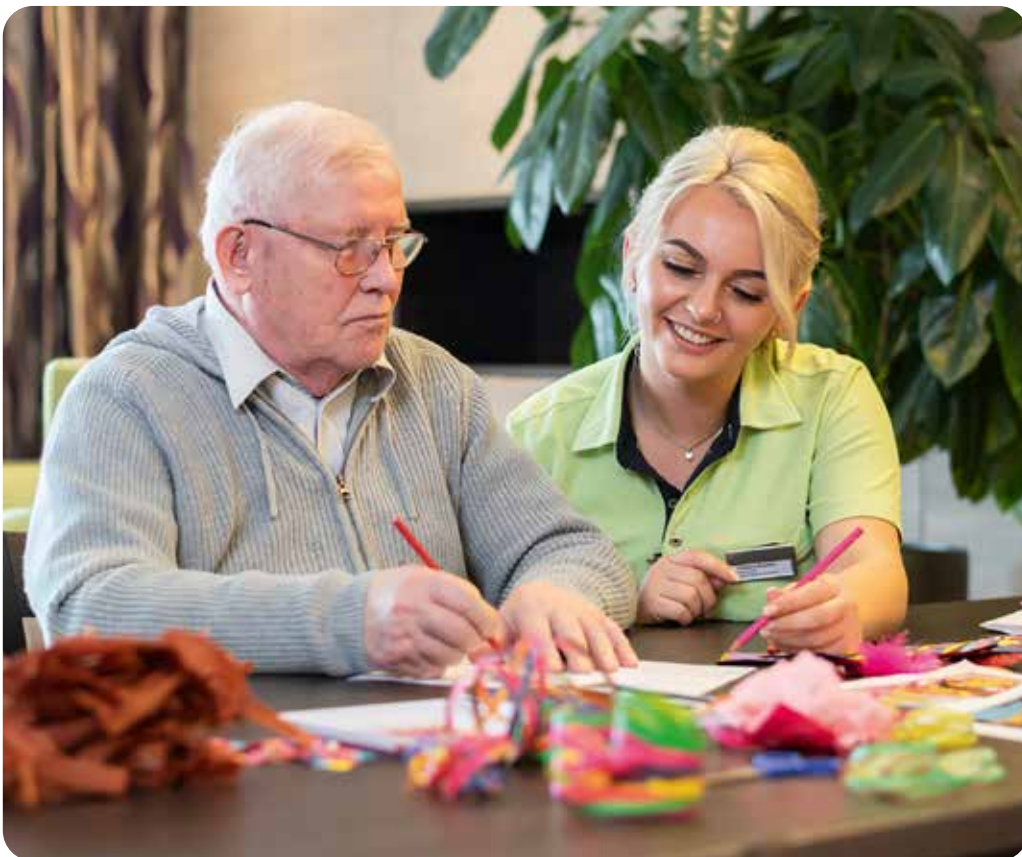
- > **Apply “zero tolerance” to corruption** (bribery and influence peddling), which is unlawful and harmful to communities;
- > **Take all measures to prevent any act of corruption** in the course of our activities.

We must:

- > **Strictly apply the Group's anti-corruption principles;**
 - > **Categorically reject** any pattern of corruption;
 - > **Immediately inform our superiors,** Compliance or Legal Department if we become aware of any corruption;
 - > **Make decisions** in the interest of the Group;
 - > **Declare our conflict of interest situations to Compliance** by filling in the declaration form available with Compliance.
-

We must not:

- > **Promise or give anything of value** (money, gifts, invitations, etc.) in order to influence a decision;
- > **Favour a personal interest** over the interest of the Group.
- > **Leave room for doubt** about corruption;



Practical cases



I need to get a building permit quickly so as not to delay the construction of a retirement home. The public official in charge of the case told me that if I paid him/her a small amount of money, he/she could speed up the administrative process and issue me the building permit more quickly.

Can I pay him/her this amount?

No, paying a small amount of money to get administrative formalities done is a facilitation payment. This is a practice prohibited by the Group and may be considered as corruption.

I have been alerted to the fact that a recent employee of mine, during an internal preparatory meeting, considered offering a benefit to a public official in order to be favoured with the purchase of a well-located plot of land to build a facility. What should I do?

The facts would constitute an act of active bribery of public officials. You should intervene immediately and explain to the employee that these practices are not tolerated within the Group. You should also refer the case to Compliance and Legal. The bribery of public officials is subject to very severe criminal penalties

An acquaintance who is close to the mayor offers to use his/her influence with the mayor to move a case forward. In exchange for this service, he/she asks me to hire him/her for a temporary assignment as a consultant. Is this an illegal practice?

Yes, the acts you are describing characterise the offence of influence peddling. It is an offence very similar to bribery, the difference being that in influence peddling, an intermediary uses his or her influence to obtain an advantage. In this case, a third party will try to influence a public decision-maker in exchange for an advantage.



Practical cases



I have received a box of chocolates as an end-of-year gift from a supplier.

Can I accept it?

Yes you can, if no commercial negotiation is in progress with the supplier. Gifts, regardless of their value, should not be kept individually. Perishable gifts (chocolates, flowers, etc.) must be shared among the team or handed in at the reception desk, break room. Non-perishable gifts (wine, books, etc.) should be handed in for raffle or shared among the team.

I have just put out a tender for the purchase of furniture. During the commercial negotiation with one of the competing suppliers, he/she offers me a bottle of wine.

Can I accept it?

No, when commercial negotiations are in progress, it is forbidden to accept any gift or invitation, regardless of its value.

I need to carry out some work in my home and I want to use an ORPEA supplier because I know that this company is reliable and serious.

Can I hire this company ?

It all depends on your position. If you hold a Management position within the Group, you will not be allowed to do so because of your ability to influence and the reputational risk that may result. If you do not hold a Management position, you may use an ORPEA supplier on the condition that they do not grant you any benefits as a result of your position at ORPEA, such as a negotiated preferential rate for ORPEA. In addition, one or two other quotes should be sought from competing companies.



Further information

Further information is available in the “Code governing the fight against corruption and influence peddling”, the “Guide to the Prevention and Management of Conflicts of Interest” and the “Gifts and invitations policy”

Principle 11 /

Actively collaborating with public authorities

We operate in a regulated environment in which the public authorities play an essential role and are key interlocutors.

We pledge to:

- > **Comply with the regulations and decisions of these public authorities** and consider the remarks, recommendations and requests of our supervisory authorities as opportunities to strengthen/optimize our own audits and continuously improve our performance;
- > **Ensure that all our employees contribute** to maintaining positive and trust-based relations with public authorities, by cultivating a transparent, constructive, collaborative and proactive dialogue with their representatives.

We must:

- > **Exercise the utmost vigilance** with regard to compliance with all legal and regulatory provisions issued by the public authorities in all countries where the Group is present;
- > **Ensure that decisions issued by public authorities** are properly implemented.

We must not:

- > **Obstruct investigations or audits** by public authorities;
- > **Fail to keep our superiors informed** of pending requests from public authorities.



Practical cases



In the context of an unannounced inspection of my facility by a supervisory authority, I have been asked to provide a certain number of documents such as employees' diplomas.

Should I withhold documents that I feel would harm the outcome of this audit for the facility?

You are obliged to cooperate with the authorities in conjunction with your superiors. Thus, even if some documents seem potentially prejudicial,

you are formally forbidden to evade or voluntarily destroy any document requested by the authorities. Keep in mind that an open and constructive dialogue is the best way to proceed.



Principle 12 /

Respecting our suppliers, service providers, partners and competitors

Suppliers, service providers, partners and competitors must be treated fairly and equitably in order to maintain the quality of relationships that are essential for sustained success. These relationships must be within a framework that respects competition law.

We pledge to:

- > **Select suppliers, service providers and partners on the basis of objective criteria** (quality, cost, alignment with the Group's ethical principles and CSR commitments) and based on prior, open and fair competitive tendering;
- > **Ensure that all purchasing activities** comply with the purchasing procedures defined within the Group.
- > **Require our suppliers and partners** at the regional, national or Group levels to sign the ORPEA Responsible Purchasing Charter.



We must:

- > **Respecting the Group's principles** of competitive tendering, in particular through transparent, fair and impartial tendering;
- > **Diligently ensure the integrity of our suppliers, partners and service providers** and their alignment with and understanding of our expectations in terms of ethics (including the fight against corruption, money laundering and terrorist financing) and social responsibility (including the environmental and social impact of the products and services offered);
- > **Respect our commitments** to our suppliers, partners and service providers by keeping the confidentiality of the technical, commercial and financial information communicated and by complying with the payment deadlines.

We must not:

- > **Impose abusive conditions** on our suppliers (delivery time, payment, etc.);
- > **Continue to work with a supplier who does not meet our expectations** or who does not respect our ethical and CSR principles, particularly with regard to human rights, health and safety, the environment and/or the fight against corruption;
- > **Discuss with our competitors** on confidential or non-public matters;
- > **Distort the rules of healthy and fair competition** (abuse of a dominant position, price fixing, etc.).



Practical cases



I am looking for a new supplier of office equipment and have identified 2 companies. The first offers good but expensive products, while the second's products are not as good but cheaper.

Can I tell the former the prices of the latter to get an extra discount?

In the interests of fairness and loyalty to suppliers, you may tell the first company that another supplier is offering more attractive rates, but you should never reveal the prices and identity of that service provider. Otherwise, you would be in breach of this Code and the rules of competition law.

A supplier came to me as part of the launch of their business. I am interested in their service and they are willing to give us a good price.

Can I select them?

Can I select them?

Depending on the amount of money involved, you should go through a call for tenders or competitive tendering and ensure the integrity of the supplier. You should also strive for a balanced relationship of power with this small supplier so that it does not find itself in a situation of economic dependence on ORPEA.



Further information

More information is available in the ORPEA Responsible Procurement Charter.

Principle 13 /

Providing true, accurate and fair information to our shareholders, investors, lenders as well as to the public and preventing insider trading

Our position as a listed Group obliges us to:

- > **Present true, accurate and fair financial information** in order to give a true and fair view of our business to the financial community / investors. In this context, each employee must provide reliable feedback;
- > **Ensure compliance with market rules that must be observed by employees that are likely to hold inside information on the company;** access to inside information can lead to punishable market abuse, and in particular to insider trading by taking advantage of this information for one's own benefit or by communicating it to relatives or third parties. Insider trading is the purchase or sale of a company's securities (e.g. shares), or other similar transactions (exercise of options etc.), by a person with knowledge of sensitive information that is likely to influence the value of these securities and not yet made public.

The communication of accounting, financial or management information to the financial community, public authorities or the media **is the sole prerogative of the General Management, the Investor Relations Department and the Finance Department.**



We must:

- > **Produce accurate and precise information**, in particular concerning accounting and management, financial and extra-financial indicators;
- > **Alert our superiors and/or the Finance Department** in the event of the discovery of an inaccuracy in the accounting or financial information;
- > **Limit the communication of sensitive information** to only those persons who strictly need it in the course of their duties;
- > **Be vigilant and question ourselves before each transaction** in ORPEA shares to ensure compliance with market rules.
- > **Cooperate with internal and external auditors**;

We must not:

- > **Communicate information externally** unless it is within the prerogatives of the position and within the framework of its purpose;
- > **Trade in ORPEA securities** directly or indirectly when we are privy to inside information;
- > **Disclose sensitive and/or confidential information**, even to those around us, or internally to employees if this is not strictly necessary for the performance of their duties;
- > **Suggest to a family member or relative that they buy ORPEA securities** on the basis of inside information, even without a financial gain for themselves.



Practical cases



While preparing a presentation of turnover indicators for the external auditors, I discovered an inaccuracy in a file. How do I react?

It is very important to report such an inaccuracy as soon as possible to your superior, who, if he/she confirm it, will pass it on to the Finance Department so that the error can be corrected as quickly as possible and the regularity and fairness of the Group's accounts can be re-established in consultation with the external auditors.

I invite a local journalist to visit the facility, which has just been moved to a new building. On this occasion, the journalist asks me about the current occupancy rate and the average price of accommodation. What should I say?

This information must not be disclosed externally. You can simply reply that these are internal indicators, and reiterate the public information:

- The authorised capacity of the facility is x beds;
- The accommodation price is € x / day.

I hear about insider trading and inside information, but how do I know if information is “inside information”?

In terms of insider trading, the following information is considered as inside information (non-exhaustive list):

- The financial situation of the Group, a subsidiary or a facility (turnover, results, occupancy rate, average accommodation price, etc.);
- Acquisition or divestment/disposal projects;
- The issuance of an operating licence;
- The loss or gain of a major contract;
- Development in a new country;
- The list of the Group's private and public partners.

If you have any doubts, we recommend that you refrain from any transaction or contact the Group's Investor Relations Department.



Principle 14 /

Using the resources made available by the Group in an ethical and responsible manner

In the course of their duties, employees have access to a set of assets, tools and resources that constitute the Group's tangible (all buildings, furniture, objects of daily use, tools and equipment) and intangible (all information, licences and knowledge) assets.

We pledge to:

- > **Ensure that everyone contributes to the respect and protection** of the company's assets in order to preserve a quality working environment;
- > **Fight against all forms of social abuse** by implementing all prevention and detection measures.

Particular attention must be paid to the use of IT resources, as each link in the security chain has a critical role to play. Thus, the use of emails, USB keys and external hard drives, the Internet, passwords, etc. must be done in strict compliance with the IT rules laid down by the Group.



We must:

- > **Use the equipment made available** to us for strictly professional purposes;
- > **Take care of the materials and equipment** provided as if they were our own;
- > **Report any damage, loss or theft of equipment** to the person in charge;
- > **Please bear in mind that all resources and documents** belonging to the Group may not be lent, transferred or disposed of without permission.

We must not:

- > **Use company equipment for personal use;**
- > **Deface sites and buildings** [intentionally or through negligence];
- > **Make inappropriate use of information systems**, e-mail and the Internet [excessive private use, viewing of risky sites, etc.];
- > **Disclose internal documents to third parties** [memos, internal mail, policies and procedures, etc.].

Practical cases



My wife urgently needs to send her CV for a job and our printer is broken.

Can I type it and print it at the office?

Personal use of the equipment provided is possible as long as it is exceptional, reasonable and does not interfere with your professional activity [done outside your working hours]. In any case, you must notify your line manager.

I am organising a birthday party for a friend and I need lots of glasses, cutlery and plates. We have too much of them in the facility and I have easy access to them.

Can I borrow them and bring them back after the party?

No, this equipment is made available for professional use only in the operation of the facility and not for personal use. Even if you have access to them, you should not borrow them.

Further information

For the use of the Group's IT resources, please refer to the Group's IT Charter.

Principle 15 /

Protecting the image and reputation of the Group, our patients and residents

The image and reputation of the Group and its brands are a valuable asset in the conduct of our business and development, particularly given the sensitive nature of our industry.

In order to continue to enjoy the trust of the residents, patients and families who choose our services, and also of the public authorities and all the stakeholders with whom the Group is in contact, we must collectively preserve this reputation.

We pledge to:

- > **Ensure that employees who express themselves on social networks** on a topic directly or indirectly related to the Group do so in accordance with our values and do not provide confidential information that could damage the Group's reputation.
- > **Obtain prior authorisation** from individuals before any use of a medium containing images, whether of a resident, patient, beneficiary, employee or external person (photo, video, etc.).

We must:

- > **Always act with an eye to the consequences** if our actions become known;
- > **Always question the relevance and impact of our publications** [personal and professional] on the Group's image and reputation [internet and social networks];
- > **Be aware that nothing on the internet is 'secret', 'temporary' or 'private';**
- > **Inform the Communication Department in the event of a request / question** concerning a subject directly or indirectly related to the Group.

We must not:

- > **Express ourselves on behalf of the Group** or one of its facilities without prior authorisation;
- > **Use the Group's business email address** or documents on the Group's letterheads for our personal business or opinions;
- > **Reveal confidential information** [financial results, ongoing projects, etc.] or publish provisional or incorrect information about the company.

Practical cases



At the end-of-year party, I took photos of my colleagues in embarrassing situations.

Can I share them on social networks with my friends via my personal account?

First of all, such photos should not be distributed without the prior consent of your colleagues. Even if such consent is obtained, the public nature of social networks means that we prohibit any publication that could harm the image of the Group's employees and, by extension, the Group itself.

My manager made several remarks about my work that day and I posted a message on my social media account quoting him to share the information with my friends. Among these friends, I also have some colleagues and ex-colleagues who have left the company. On reflection, I am afraid that my words will be spread.

Was I wrong to share this information?

Before you publish anything in writing on social networks (and even internally), you should ask yourself whether you would be prepared to take responsibility for it if it became public. Indeed, what you publish on social networks no longer belongs to you (text, image) and can therefore be shared, republished and even reposted on other media. Thus, you find yourself responsible for information that has become public.



Principle 16 /

Respecting the requirement of confidentiality in the handling of sensitive information

Information about the Group represents an economic and strategic value that is part of the company's intangible capital, which ensures its sustainability and differentiation from the competition.

We pledge to:

- > **Make the Group's employees aware** of the need to exercise caution and common sense when handling and exchanging information that they come into contact with, whether it be with colleagues, service providers integrated into the teams or external third parties;
- > **Ensure that internal information and documents** are only disclosed to those who are authorised to know them, especially if they are sensitive and/or confidential information of a strategic, commercial, financial or organisational nature, for example.

We must:

- > **Communicate internal information** only to those who have a legitimate need to know;
- > **Mark documents as "confidential"** or "internal use only" whenever necessary;
- > **Inform our interlocutors orally** during meetings about the confidential nature of the information and specifying that it should not be disseminated;
- > **Keep confidential information and data secure**, whether in paper or digital format;
- > **Assess the level of confidentiality of information** before any external transmission (contact the custodian of the information in case of doubt) and resort to a confidentiality agreement whenever necessary.

We must not:

- > **Disclose confidential information** to an external third party who does not have a compelling need to know it in the course of carrying out its duties;
- > **Retain and use internal information** in case we leave ORPEA.
- > **Discuss confidential information in public places**, where conversations can be overheard and data security compromised;

Practical cases



I took part in a meeting where the internal speaker made it clear in the introduction that the content of the project and the discussions should remain confidential. There were many of us at the meeting and I want to share the information with my team; can I do this?

No, you should first approach the person who specified that the information provided is confidential in order to verify that you can share it with your team, even if they will be involved later.

In the context of a new strategic project for the Group, I have to contact various internal and external stakeholders. What information can I communicate to the various stakeholders?

It is not necessary to communicate all information about the project to all stakeholders. You must identify the internal or external persons to whom all the information should be entrusted because they have a legitimate need to know it, and those to whom only that part of the information necessary for their mission should be communicated. In any case, you must use confidentiality agreements if the material is transmitted externally.



Consequences of non-compliance with this policy

Any breach of these rules, regardless of the extent of the breach or damage caused, may give rise to the application of the sanctions policy set out in the employment regulations, given the vital importance of compliance with this code of conduct.

Infringements committed by third parties and/or self-employed workers are subject to the sanctions provided for in the service contract binding them to ORPEA Belgium SA or the residential care center concerned.



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

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