



2022 Vigilance Plan

V.6. - Group Compliance Plan

The Maisons De Famille Group is drawing up its vigilance plan to meet the requirements of the French law (2017-399) of March 27, 2017 on the duty of vigilance of parent companies and principals.

This plan includes reasonable vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, personal health and safety, and the environment.

It applies to the Group's parent company, Groupe Maisons De Famille S.A., as well as to subsidiaries controlled directly or indirectly by this company within the meaning of Article L. 233-16 of the French Commercial Code, and to suppliers and subcontractors with whom the various Group companies have an established commercial relationship.

It is structured around the following measures:

1. risk mapping ;
2. regular assessment procedures for subsidiaries, subcontractors and suppliers;
3. appropriate risk mitigation or prevention actions;
4. an alert and reporting mechanism ;
5. a system for monitoring the measures implemented and evaluating their effectiveness.

This plan is conşu with purchasing, medical, IT, human resources, CSR, quality, operations, real estate, legal departments, facility managers in conjunction with general management and the governance bodies of the Group and its subsidiaries.

Group risk mapping

The Maisons De Famille Group is working on a consolidated map to assess the risks of serious violations of human rights and fundamental freedoms, personal health and safety, and the environment.

To achieve this, the methodology used is based on :

- A review of the results of existing mapping, particularly in the areas of HR, quality and CSR;
- interviews with company stakeholders (directors, compliance officers, purchasing managers, human resources managers, quality managers, etc.);
- monitoring the social, economic and regulatory context of the countries in which the Group's facilities are located;
- analysis of key regulatory documents (United Nations and OECD guidelines, Défenseur des droits report on EHPAD, ILO conventions, etc.).

To date, the exercise has identified 21 risks. These are divided into four distinct themes : (i) human rights of residents, (ii) human rights of employees, (iii) health and safety, and (iv) the environment. Examples of appropriate actions to prevent and mitigate these risks are presented in the following tables:

Residents' human rights

Denomination	Examples of measures taken within the Group and its subsidiaries
Risks of intentional or unintentional abuse	<ul style="list-style-type: none"> • Regular training for employees on good treatment • Adverse event reporting process
Medication risks	<ul style="list-style-type: none"> • Procedure for integrating the resident, with assessment of all health-related risks in order to adapt personalized care for the resident, leading to a personalized care plan and the drafting of personalized care objectives based on the personalized project. Reassessment at least once a year • Daily monitoring of all risks and care through a multidisciplinary meeting
Risks associated with not taking complaints into account	<ul style="list-style-type: none"> • Satisfaction survey for residents and their families • Complaints management procedure
Risk of loss and theft of residents' belongings	<ul style="list-style-type: none"> • Insurance in the event of theft or fault on the part of the establishment in the disappearance of the goods • Secure rooms
Risks of not respecting residents' private and family life	<ul style="list-style-type: none"> • Restricted access rights management for medical data • Dealing with ethical issues in the context of multidisciplinary meetings
Risks of abusive restraint for a resident	<ul style="list-style-type: none"> • Procedure and best practices for the use of physical restraints only on medical prescription • Monitoring of restraint rate indicators implemented in the home
Risk of the company losing residents' medical data and information	<ul style="list-style-type: none"> • Backup servers are located in separate areas of the main center • Emergency software system • Business continuity plan

Workers' human rights

Name	Examples of measures taken within the Group and its subsidiaries
Risk of discrimination	<ul style="list-style-type: none"> • Code of conduct • Gender equality plans
Risks of failure to respect workers' freedom of association or demonstration	<ul style="list-style-type: none"> • Annual negotiations with union representatives
Risks associated with not respecting work-life balance	<ul style="list-style-type: none"> • Flexible working time models on request • Right to disconnect (charter)
Risks of loss of employee data and information by the company	<ul style="list-style-type: none"> • Backup servers are located in separate areas from the main center. • Emergency software system • Business continuity plan

Health & Safety

Denomination	Exemples de mesures prises au sein du Groupe et de ses filiales
Risk of epidemics and infections	<ul style="list-style-type: none"> • Procedure for preventing epidemic risks • Mandatory reporting to supervisory authorities
Risks of shortage or lack of qualified personnel	<ul style="list-style-type: none"> • Actions to improve the employer's image and make it attractive • Salary increases for staff concerned
Food safety risks	<ul style="list-style-type: none"> • Medical inspection of kitchens • Alert on medical records of residents affected by identified food safety risks
Psychosocial risks	<ul style="list-style-type: none"> • Psychosocial risk prevention training • Regular employee turnover
Risk of workplace accidents	<ul style="list-style-type: none"> • Occupational accident risk prevention training • Department in charge of this specific risk
Safety risks for buildings and equipment	<ul style="list-style-type: none"> • Certifications (e.g. BREEM) • Regular site inspections
Health and safety risks employees of business partners	<ul style="list-style-type: none"> • Mandatory documents required for business relationships • Including a compliance clause in the contract

Environment

Name	Examples of measures taken within the Group and its subsidiaries
Risks associated with medical and non-medical waste management	<ul style="list-style-type: none"> • ISO 14001 certification • Internal procedure for waste management
Risks associated with the intensive use of natural resources (energy, etc.)	<ul style="list-style-type: none"> • Installation of a renewable energy system (e.g. panels solar) • Evaluation of energy consumption per house
Pollution risks	<ul style="list-style-type: none"> • Carbon footprint assessment (scopes 1 and 2)

The Group is currently in the process of analyzing its risks, which will subsequently lead to their prioritization.

Regular assessment of the situation of subsidiaries, subcontractors or suppliers and control of the system

The regular analysis of risks, the monitoring of the implementation of mitigation or prevention measures and the evaluation of their effectiveness are carried out by a coherent group of both internal and external players.

The activities of both Group entities and business partners are assessed and monitored.

Regular risk assessment and control of the system within Group entities are carried out by :

- facility managers, in liaison with operational departments, notably Quality and Medical Affairs, on their business risks through regular controls and audits. (e.g. self-assessment questionnaire, satisfaction questionnaire, etc.);
- **General managers, assisted by their compliance and CSR advisors**, on the deployment and effectiveness of the system within their respective entities (e.g.: compliance of the plan with regulatory requirements);
- **Group and subsidiary governance bodies**, which oversee implementation of the plan. Compliance issues are discussed at *least* twice a year by the Board of Directors, the Audit, Risks and *Compliance* Committee and the Executive Committee. These meetings provide an opportunity to present the annual update of local mapping, to draw up subsequent action plans and to assess their effectiveness.

This assessment is supplemented by the results of external internal control and audit assignments carried out on the activities of the Group and its subsidiaries by authorized **external bodies** (supervisory authority, audit office, independent bodies).

A regular risk assessment and control of subcontractors and suppliers is carried out. Before entering into, continuing or renewing a business relationship, a risk analysis is carried out, notably using an integrity questionnaire.

This is a vigilance measure designed to identify potential risks to business ethics, human rights, health and safety or the environment, as well as risks associated with international sanctions programs. This initial assessment or

"Due diligence is carried out internally by the purchasing department teams.

If necessary, an additional analysis, provided by the *Compliance* referent, will clarify and reinforce the assessment.

Depending on the information obtained, it may be decided not to initiate or interrupt the relationship, or to continue it, subject to the implementation of appropriate preventive measures: protective contractual clauses, requests for guarantees, reinforced controls.

Mechanism for alerting and collecting reports on the existence or occurrence of risks

A whistle-blowing system is available to all employees and stakeholders (e.g. suppliers, residents, residents' families, etc.) to enable them to report such breaches.

Groupe Maisons De Famille guarantees the strict confidentiality of the identity of the whistleblower, the person who is the subject of the alert and the facts that are the subject of the alert.

Reports are treated confidentially, subject to applicable legal obligations and any administrative or legal proceedings.

No disciplinary or discriminatory measures may be taken against employees who have reported a problem, even if the facts are not proven, as long as these employees have acted in accordance with the criteria set out above.

However, misuse of this device may be subject to disciplinary sanctions or even legal action.

The professional alert system and its instructions for use are available at the following address: <https://groupemaisonsdefamille.whistleblownetwork.net/frontpage>