



ANTI-BRIBERY POLICY

Being the most trusted player recognised for the quality of its care and services.

Helping everyone live a more enjoyable, fulfilling and inclusive life.

Reasons for an anti-bribery policy

"Our Group aspires to become the most trusted player recognised for the quality of its care and services, enabling every person to live a more enjoyable, fulfilling and inclusive life.

Achieving this ambition requires us to create sustainable value for our stakeholders, based on balanced development, responsible performance and shared trust.

In caring for vulnerable people, this trust must be constantly nurtured through irreproachable and ethical conduct towards our residents, employees and business partners.

This document reflects the fundamental values that guide our organisation: *"People, ethics, optimism and high standards"*. It demonstrates not only our commitment to our stakeholders, but also our high standards for ourselves. It acts as a compass, helping us to carry out each of our actions ethically, whatever the circumstances.

We therefore call on all our employees to act with absolute rigour in upholding our values and ethics, because it is up to each and every one of us to be the guardians of these essential principles".

Chairman of the Board of Directors



Chief Executive Officer,
Maisons de Famille



Chief Executive Officer, Amavir



Group Chief Executive Officer



Chairman of the Board and
Chief Executive Officer, La Villa



Chief Executive Officer, Dorea



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01 Reasons for an anti-bribery policy

The anti-bribery policy in six key points:

1. It contributes to the **company's aspiration** to "*become the most trusted provider of quality care and services that enable people to live more enjoyable, fulfilling and inclusive lives*" and reflects one of our key values, ethics. **(pages 7 and 8).**
2. It **explains and illustrates** what fraud, bribery and influence peddling are, using definitions, examples and diagrams, and sets out the **main warning signs**. **(pages 10 to 13)**
3. It presents some of the **everyday situations** in which we may be confronted, such as in our dealings with business partners or when we receive a gift or invitation. **(pages 14 to 20)**
4. It sets out the **resources available** within the company to deal with these situations and the people to contact to **protect** yourself, such as the **whistleblowing procedure**. **(pages 22 to 23)**
5. It is intended to **apply to all company employees and managers**. It is included in the **internal regulations** and any breach of its content could lead to disciplinary action.
6. If you have any **questions, doubts or comments** about this policy, please do not hesitate to discuss them with your colleagues, your manager, your director, Human Resources, the Compliance Officer or your staff representatives.



01 Reasons for an anti-bribery policy

The strength of the Maisons de Famille Group lies above all in the day-to-day commitment of all its employees, in all their activities, to promoting shared values that help to preserve the bonds of trust, transparency and responsibility that are essential to ensuring its long-term future.

This culture of integrity is part of our strategy to create sustainable value for our stakeholders, based on balanced development, responsible performance and shared trust. It also resonates with our values of *"People, Ethics, Optimism and High Standards"*.

The Group is committed to actively combating bribery and influence peddling, which are unethical practices with a serious economic and social impact.

At European level, the annual cost of bribery could amount to €990 billion, or 6.3% of European GDP.

A culture of integrity is essential to ensure the sustainable performance of the Maisons de Famille Group and everyone is called upon to promote it.

▶ **What are the obligations of the Maisons de Famille Group in terms of combating bribery and influence peddling?**

All the companies under the control of the Maisons de Famille Group, in France and abroad, must comply with the French "Sapin 2" law on transparency, the fight against bribery and the modernisation of economic life, as well as other anti-bribery laws and regulations applicable to them.

The Sapin 2 law requires the implementation of a plan for the prevention and detection of bribery and influence peddling structured around the following eight measures:

- an anti-bribery policy
- a whistleblowing procedure
- a bribery risk map
- procedures for assessing third parties
- anti-bribery accounting control procedures
- a training and awareness programme

- a specific disciplinary system
- monitoring and evaluation of programme implementation.

▶ **What are the risks for the company and its employees?**

FOR THE MAISONS DE FAMILLE GROUP

For the company, significant fines accompanied by publicity measures, bans on operating establishments in its countries of operation, and significant consequences for its reputation, business and financial situation (e.g. inability to take out bank loans, loss of customers and partners, etc.).

FOR MANAGERS AND EMPLOYEES

The Maisons de Famille Group wishes to point out that any form of bribery or influence peddling is strictly prohibited and constitutes a violation of the law, as well as of the ethical and professional standards in force within the company.

Any manager or employee who engages in these practices is liable to disciplinary action, as well as imprisonment, fines and confiscation of their assets.

It is important to emphasise that these punishable acts can in no way be considered as being perpetrated in the interest or on behalf of the Maisons de Famille Group or any of its companies.

FOREIGN LAWS

In addition, certain acts of bribery or influence peddling may also be sanctioned by foreign laws with extra-territorial scope.

This means that an act of bribery or influence peddling committed by a Maisons de Famille Group manager or employee, wherever they may be, could constitute an offence under foreign laws. It could therefore constitute an offence under several different laws.

▶ **What are the objectives of this anti-bribery policy?**

The Maisons de Famille Group has a code of conduct that describes the company's commitments to combating bribery and promoting an ethical culture.

This anti-bribery policy explains what bribery is, what is at stake, what forms it takes and what the risks are. It also gives examples of situations in which bribery may occur and warning signs to help identify it. This document also shows the behaviour and procedures that employees should follow to prevent bribery or remedy it if they witness it. Finally, it sets out the detailed procedures and specific people who can help if in doubt.

This anti-bribery policy cannot cover every possible situation, but it is a practical tool to help make decisions appropriate to the circumstances. If employees have difficulty understanding this anti-bribery policy, they can discuss it with their colleagues, line manager, director or the company Compliance Officer.

The anti-bribery policy is important for the Maisons de Famille Group as it helps to safeguard the company's ethical culture and ensure that all employees work together to combat bribery and promote trust and transparency.

▶ **Compliance with the anti-bribery policy**

This anti-bribery policy applies to all persons bound by a contract of employment with the Maisons de Famille Group or one of its subsidiaries, whatever their hierarchical level, geographical location or reporting entity.

Its content has been approved by the Group's Board of Directors and the managers of each country of operation.

▶ **Local anti-bribery regulations**

This anti-bribery policy cannot take account of all the requirements of local legislation; these only apply where they are more restrictive than the rules imposed by the company.

If necessary, employees can ask their local Compliance Officer about the scope and consequences of these local specificities.



02 . Types of bribery

Preventing and detecting bribery requires knowledge of the main offences that give rise to this risk.

► What is a bribery offence?

The offence of bribery is only one aspect of breaches of probity. It can take many forms, such as influence peddling, which will be discussed later.

BRIBERY CAN BE PASSIVE OR ACTIVE

Passive bribery occurs when a person uses their position to obtain gifts, money or benefits in exchange for doing or not doing something in their job to benefit themselves or someone else. When this happens, the person is considered a bribe-taker.

Example: A public official asks me to recruit one of his relatives in order to give a favourable opinion to the company in the context of a safety committee.

Active bribery is when someone offers or promises gifts, money or benefits to someone to make them do or not do something in their job, in order to benefit themselves or someone else. The person who does this is called the briber.

Example: I invite a regional councillor to a prestigious sporting event to persuade him to support a legislative amendment favourable to the company.

BRIBERY CAN BE PUBLIC OR PRIVATE

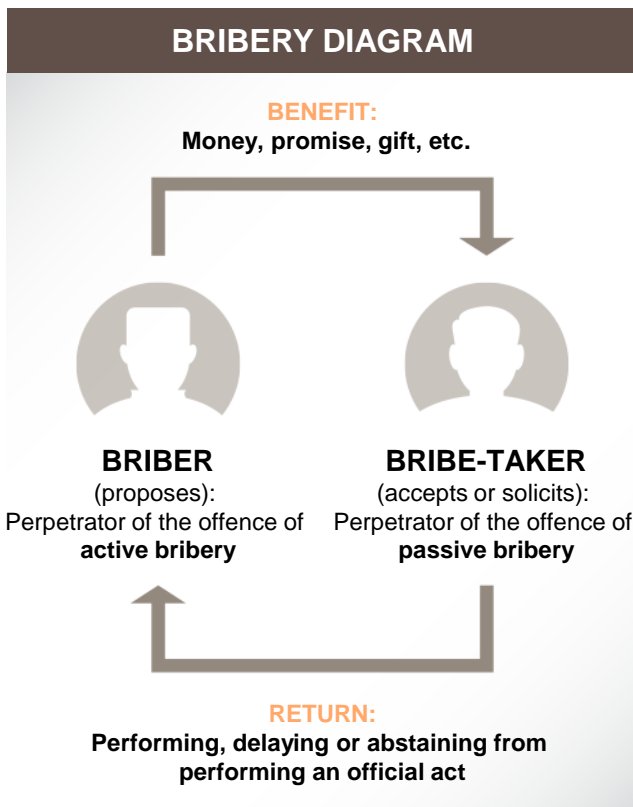
Bribery is said to be public when the bribe-taker is a public official, i.e.:

- any person vested with public authority (State official or official of a local or regional authority – e.g. an official of the Ministry of Health);
- any person entrusted with a public service mission (in particular a person employed by a public establishment or by an association mainly financed from public funds – e.g. a health agency official);
- any person holding a local elected office (mayor, member of parliament, etc.);
- any person employed by a public international organisation;
- any company in which a State or public entity holds shares or an interest.

Under certain circumstances, bribery of a public official may also be considered to be an act of giving a benefit to persons acting on behalf of a public official or a person close to them.

Private bribery occurs when the bribe-taker is not a public official.

Example: I take care of the holidays of a prescriber and his family in exchange for the promise to encourage the referral of new residents to the Group's homes.



► **What is influence peddling?**

Some laws, for example in France, Italy and Spain, make a distinction between the offence of bribery and that of influence peddling. Other laws, such as Germany's, make no such distinction.

LIKE THE OFFENCE OF BRIBERY, A DISTINCTION SHOULD BE MADE BETWEEN ACTIVE AND PASSIVE INFLUENCE PEDDLING

Passive influence peddling is when someone accepts a benefit in order to use their real or supposed influence, directly or indirectly, to help someone obtain a favourable decision.

Example: A consultant, a former official of a health agency, asks me for money by promising to use his connections to obtain an operating licence.

Active influence peddling is when a person offers or gives a benefit to another person so that they can use their influence, real or supposed, to obtain a favourable decision.

Example: A third party offers me a case of wine in order to influence me regarding the renewal of a medical equipment contract for his cousin's company.

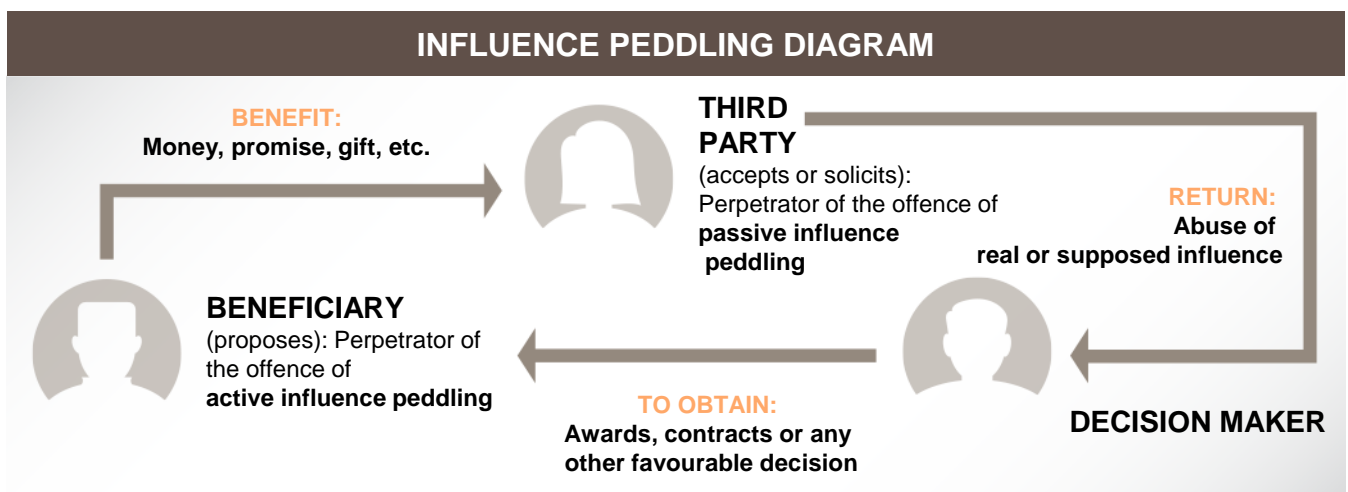
DIFFERENCE BETWEEN BRIBERY AND INFLUENCE PEDDLING

The essential difference between bribery and influence peddling lies in the number of people involved in the commission of the offence.

Bribery involves a briber and a bribe-taker. The briber abuses his power for the benefit of the bribe-taker.

Influence peddling involves a third party abusing their influence with a decision-maker, to the benefit of the beneficiary of the decision.

IMPORTANT:
Bribery and influence peddling are strictly prohibited without direct or indirect benefit to the employee.





03. Warning signs and high-risk situations

There are warning signs that should raise our awareness when we encounter them in our working lives and call for vigilance.

▶ Warning signs

The practices and behaviour described below should be considered abnormal in any business context. If you come across any of them, you must be vigilant and report the situation immediately to your line manager:

any lack of transparency and traceability in transactions, expenses and statements of operations;

any request to cover costs in cash and/or insufficiently documented, payments without reference to an invoice or order;

any method of payment that is not provided for contractually or that is unusual, such as a request for a transfer to a third party or to a third country, a request to modify certain payment terms, etc;

any proposal to use **intermediaries unnecessarily or without explanation**;

any offer of a benefit and/or request for a gift in cash or in kind for the provision of a service;

any business partner who provides **false invoices or other false documents**;

any employee of a company or public official **who gives the impression of acting alone**, outside the structure or organisation to which they belong;

any request for **commissions / fees / provisions that are high** in relation to market practice, without an objective reason;

any **refusal by a third party to certify in writing** that it complies with anti-bribery legislation;

any request for a **job**, outside the company's official recruitment system, **for a friend or family member**;

any request to make a donation to a **charitable organisation** in exchange for a benefit;

any **negative information relating to the reputation** of the natural or legal person with whom the business relationship is established (incriminating article in the local press, previous conviction for breaches of probity, etc.).

▶ Situations likely to encourage acts of bribery

While the risk of bribery can occur at any time in one's working life, there are circumstances in which it is more likely to occur.

In the context of the activities of the Maisons de Famille Group in France and internationally, these situations have been identified using the bribery risk map.

There are seven of them:

- conflicts of interest;
- offering and accepting gifts and invitations;
- facilitating payments;
- lobbying action;
- relations with business partners (including sponsorship and image partnerships);
- accounting records;
- mergers and acquisitions.

These situations are described in detail below, together with practical advice to help you protect yourself and your company against the risks of bribery and influence peddling.

The occurrence of these situations may depend on a number of factors, such as geographical location and the nature of the business relationship.



1 CONFLICTS OF INTEREST

In order to protect ourselves and preserve the reputation of the Maisons de Famille Group in the eyes of its stakeholders, we must all avoid situations where our private interests could conflict with those of the company.

Recognising a conflict of interest situation is not necessarily easy. A good way to do this is to ask yourself:

- Do I have a close family, friendly or professional relationship with the business partner with whom I am discussing, negotiating or working?
- Can this situation affect my judgement, or appear to affect the decisions I take on behalf of the company?
- Do I feel a sense of obligation because of this relationship with the third party?
- Would I be uncomfortable if one of my colleagues knew? What would I do if I learned that someone in my team was in such a situation? How might this situation be perceived by someone outside the Maisons de Famille Group?

Being in a conflict of interest situation is not in itself illegal and can occur several times in the course of one's working life. However, even a potential conflict of interest can make it difficult for us to carry out our duties impartially and independently.

It is therefore essential to declare any conflict of interest, even a potential one, so that it can be analysed in depth and we can avoid getting into trouble. This approach will lead to a confidential handling of the situation with the line manager and the Compliance Officer.



EXAMPLE OF MISCONDUCT:

I would like to involve a cleaning service company in a call for tenders whose quality and price are among the best on the market. However, the company is run by one of my family members.

There is nothing wrong with offering the services of a company with an established reputation. However, in this case, you should declare your family ties to your manager or Compliance Officer and not take part in the selection process.

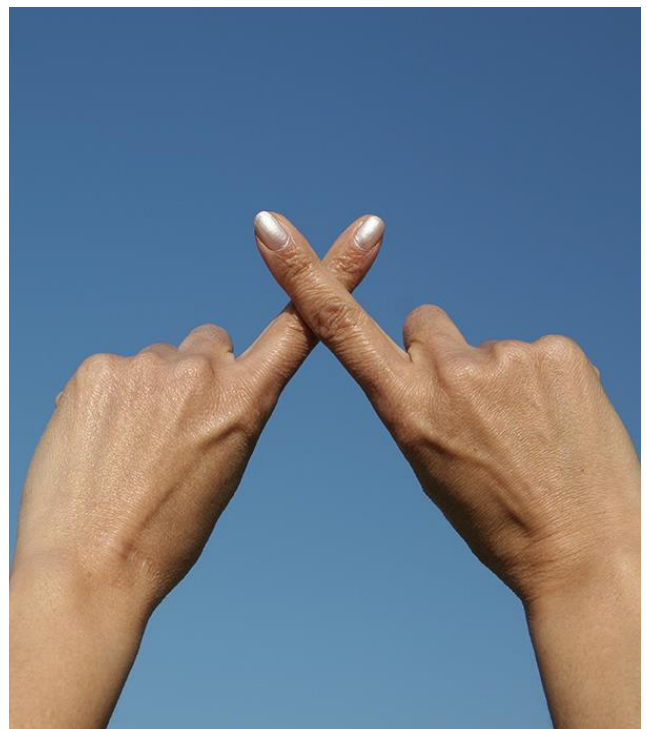
FURTHER INFORMATION:



Your Compliance Officer is available to answer any questions you may have regarding this matter.



Procedure for managing conflicts of interest



2 GIFTS AND INVITATIONS

We may offer or receive invitations or gifts to strengthen our business relationships, but it is important to respect the rules and principles established by the Maisons de Famille Group and the law in order to avoid any form of bribery.

A gift may include any type of payment, gratuity, benefit, present or service, such as the payment of business travel expenses, free services or the loan of premises.

Invitations may take the form of events, entertainment (sporting or cultural), travel, accommodation or meals offered or received.

▶ Prohibition

As a matter of principle, it is always prohibited to offer or receive a gift or invitation:

- with the aim of influencing the behaviour of or obtaining consideration from a third party;
- in the form of cash or cash equivalents (e.g. gift vouchers);
- in the form of a facilitating payment (see. 3 – Facilitating payments);
- during a sensitive period such as a tender or contract renewal period.

In addition to the above-mentioned prohibitions in principle, the following rules must be observed depending on whether the person we are dealing with is a public official or a private individual:

▶ Public official

All legislation condemns bribery of public officials. In this context, any offer intended for them is **prohibited**.

Exceptionally, a token of courtesy may be offered if it meets the following conditions:

1. it is for a symbolic amount;
2. it complies with the applicable legislation;
3. it is not made with the aim of influencing them or obtaining consideration.

EXAMPLE OF MISCONDUCT:

I would like to offer an official in charge of auditing my home to take his son on a work placement in exchange for a positive assessment.

You should not make this offer as it is tantamount to bribing a public official.

EXAMPLE OF MISCONDUCT:

The son of a resident regularly offers me gift vouchers so that his father can enjoy preferential treatment.

You should politely refuse these regular solicitations, especially when they are made in the form of cash or cash equivalents.



2 GIFTS AND INVITATIONS

▶ Private individuals

For people who are not public officials, the gift or invitation, in order to be acceptable, must comply with the following criteria:

1. The gift or invitation must be offered or received in a professional context (not including family members or close friends) and comply with the legislation and ethical rules of the Maisons de Famille Group;
2. it must be occasional;
3. it must not exceed a maximum unit value of €60 (or a lesser amount).

If the value of the gift or invitation exceeds the aforementioned amount, prior written authorisation must be obtained from the Chief Executive Officer, who will ensure that it can be traced.

▶ Gifts and invitations as part of a commercial, promotional or communication event organised by the Maisons de Famille Group

The Chief Executive Officer may approve a request for exemption for invitations to commercial, promotional or communication events organised by the Group or one of its entities (e.g. inauguration of new establishments).

These operations may be subject to internal regulations specifying, in particular, the purpose, timetable and content of the events, the terms and conditions for welcoming and accommodating guests, the value of the gift package to be offered to guests, the invitation criteria for external and internal guests, the number of guests, the total budget allocated to the operation, etc.



EXAMPLE OF MISCONDUCT:

I am a receptionist and my manager has asked me to look for a florist near our premises. After a bit of research, I decided to suggest two florists to my manager. One of them has just sent me a ticket for a Céline Dion concert, which I am a big fan of. Should I accept it?

You cannot accept this concert ticket. This would put you in a situation of conflict of interest, corruption, or dependence on this supplier.



EXAMPLE OF MISCONDUCT:

I am organising an event to present the opening of a new home to potential customers and local politicians; at the end of the event, each guest is invited to the nearby Michelin-starred restaurant.

It is not permitted to offer invitations for such a large amount, as this practice does not comply with the Maisons de Famille Group's procedure for managing gifts and invitations.

Any employee wishing to be reimbursed for professional expenses must ensure that they only claim compensation for amounts strictly related to their work.

In the case of a trip abroad and/or the normal activity of the department, it is advisable to follow the "Expense Claim" policy in the country which governs the payment of expenses incurred for travel.

FURTHER INFORMATION:



Your Compliance Officer will be happy to answer any questions you may have regarding this matter.



Procedure for managing gifts and invitations

Local expense claim policy

3 FACILITATING PAYMENTS

It is strictly forbidden to make even small, unofficial or illegal payments to a public official to speed up or facilitate administrative procedures relating to their duties, such as the issue of authorisations or approvals.

To avoid such situations, it is crucial to follow administrative procedures to the letter and to pay mandatory administrative fees online whenever possible.

If you are asked for a suspicious payment or if you have any doubts about the nature of a payment request, you must absolutely consult your manager or your Compliance Officer before taking any decision.



EXAMPLE OF MISCONDUCT:

A civil servant demands that he be paid a sum of money in order to fast-track the issue of planning permission for the extension of an establishment.

This proposal must be refused as it would constitute a prohibited facilitating payment.



EXAMPLE OF MISCONDUCT:

In preparation for upcoming safety commissions, a public servant is asking us to pay him a sum of money in order to give us a favourable opinion. Is it in line with the Group's values to give him this money? What should I do?

No, it is forbidden to give in to this situation. What's more, if you give in, you risk disciplinary action and being prosecuted for bribery. Therefore, if such a situation arises, speak to your Line Manager or Director. The behaviour of the public official could be reported.

FURTHER INFORMATION:



Your manager or Compliance Officer is on hand to answer any questions about facilitating payments.



4 LOBBYING ACTION

Lobbying can be defined as a legal and regulated activity designed to influence a public decision, in particular the content of a law or regulation.

When used in a clear and transparent manner, lobbying can contribute to a company's performance and positive reputation.

Consequently, any person who, as part of their duties, is required to represent the interests of the Maisons de Famille Group must comply with the following rules:

- refrain from inciting any person to contravene the standards of conduct applicable to them;
- refrain from taking any steps to obtain information or decisions by fraudulent means;
- refrain from disposing of documents not officially published by the institutions for valuable consideration or for any other consideration;
- enter their names in the institutions' interest representation registers, where these exist.

All lobbying action must be carried out in compliance with legal procedures.



EXAMPLE OF MISCONDUCT:

A partner lawyer is asking me to pay him a substantial financial commission to influence the decisions of a civil servant in charge of renewing licences.

Even if this request is in the interests of the company, it should be refused as it constitutes influence peddling.



EXAMPLE OF MISCONDUCT:

My line manager has suggested that I make a donation to his daughter's football club. Is this appropriate?

No. Even if your manager is not forcing you to do so, such a request, even if innocent, is not appropriate and could be considered as putting intolerable pressure on you.

FURTHER INFORMATION:



Your Compliance Officer is at your disposal to answer any questions you may have regarding this matter.

5

RELATIONS WITH BUSINESS PARTNERS 19

The Maisons de Famille Group ensures that its relationships with its business partners (suppliers, service providers, prescribers, etc.) comply with its ethical and compliance rules.

To this end, the following measures are taken when formalising business relationships and throughout their duration:

- Comply with the procedures and rules in force, particularly with regard to the selection of suppliers, external contractors, donations, sponsorship, image partnerships, etc.;
- Include anti-corruption clauses in contracts with third parties, enabling agreements to be terminated and all relations to be interrupted.

In the event of recourse to an intermediary, i.e. any independent person (lawyer, consultant, representative, etc.) acting on behalf of or on the orders of the Maisons de Famille Group to conclude, develop, maintain or bring to a successful conclusion business by means of contacts or information, it is advisable to ensure in addition to the above:

- that any remuneration granted is transparent and corresponds to a legitimate and effective service rendered to the Maisons de Famille Group;
- that the service provided is precise in terms of both its content and the means of achieving it. Proof of the services provided by this intermediary must be subject to appropriate checks to ensure the reality of the service.



EXAMPLE OF MISCONDUCT:

A certifier suggests that I pay him for part of the work on his main residence in exchange for the renewal of a quality certification.

This must be rejected as it constitutes an act of bribery.

FURTHER INFORMATION:



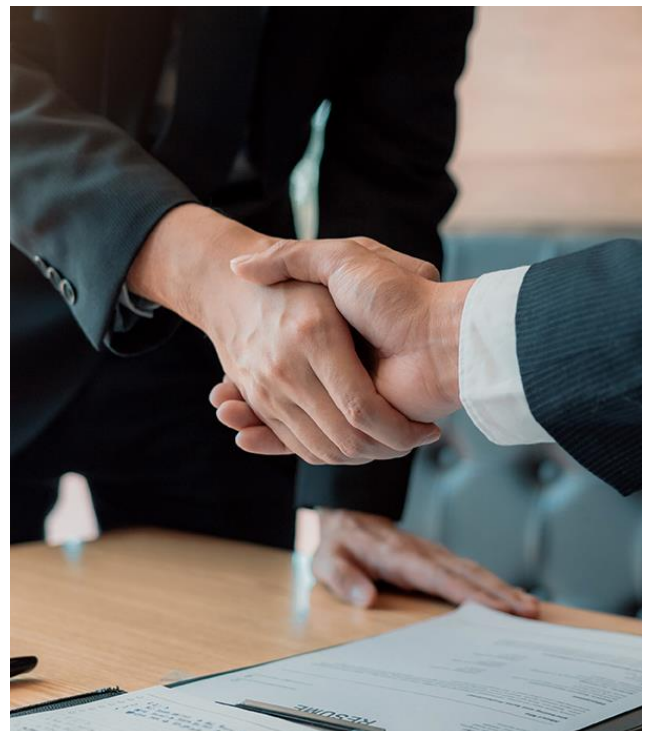
Your Purchasing Department is available to answer any questions you may have regarding this matter.



EXAMPLE OF MISCONDUCT:

I am looking for a new office supplies distributor. The first one I contacted offers quality but expensive products. The second distributor's products are not as good, but they are cheaper (mainly because he is offering us a substantial discount in order to count the Group among his Customers). Can I tell the former the prices offered by the latter to try and get him to lower his prices?

You can tell them, in very general terms, that another supplier is offering you better prices, but without revealing the prices or the identity of the other supplier. Otherwise, you would be passing on confidential information about your competitor, which would be unethical and, in many countries, against the law.



6 ACCOUNTING RECORDS


The Maisons de Famille Group has accounting and financial control standards and procedures designed to ensure that records, books and accounts are not used to conceal bribery or influence peddling.

In fact, documents that are not accurate or that have been manipulated can constitute incriminating evidence against a company prosecuted for these offences.

To ensure that they are accurate, reference should be made to the accounting controls in place.

These appropriate controls apply in particular to mission and reception expenses, purchases of services, etc.


In any case, it is the responsibility of any employee who, in the course of their duties, agrees to the payment of a service or the delivery of goods, to ensure that the service has actually been provided or that the goods have actually been supplied.

 **EXAMPLE OF MISCONDUCT:**

My days are sometimes a bit hectic and I sometimes have trouble finding the receipts for my expenses. Can I declare a few fictitious expenses, of less value than the sums requiring a receipt, to arrive at the right total? There would be nothing dishonest about it, as it would not be more than the correct amount. I just want to receive what I am owed.

No. That is not acceptable. It would mean that the expense reports are not accurate, and therefore the accounts will not be accurate either. It is your responsibility to keep all receipts. This is the only way to be sure of being reimbursed for your expenses.

FURTHER INFORMATION:

 **Your Accounts Department will be happy to answer any questions you may have regarding these rules.**

7 MERGERS AND ACQUISITIONS

Mergers and acquisitions are complex strategic operations which may have significant financial, legal and operational implications.


The Maisons de Famille Group may be held liable for any criminal acts committed by the companies it has acquired.

It is essential to carry out anti-corruption audits and checks on target companies before any merger or acquisition is undertaken.

These necessary checks can be understood as steps taken to:

- Determine whether the target company has been involved in any breach of probity or, if it has been sanctioned for such acts, find out what sanctions have been taken against it;
- Ascertain the existence and, if possible, assess the quality and effectiveness of its anti-bribery procedures.

FURTHER INFORMATION:

 **Your Compliance Officer is always at hand to answer any questions you may have regarding this matter.**



04. DEALING WITH HIGH-RISK SITUATIONS

In order to manage these high-risk situations and ensure that you have the right attitude to deal with them, the Maisons de Famille Group provides a range of tools to help you make the best decision.

Whistleblowing

A whistleblowing procedure is accessible to all employees as well as to the company's stakeholders (e.g. suppliers, residents' families, etc.) to enable them to report incidents.

It complements the internal reporting channels, i.e. the manager, the facility director, human resources, the Compliance Officer and staff representatives.

► Conditions for obtaining whistleblower status

To qualify for whistleblower status, a number of criteria must be met:

1. report **facts contrary to the law or to this policy**;
2. act in a **disinterested manner**, i.e. without financial consideration;
3. be acting in **good faith**, i.e. sincerely and legitimately believing in the reality of the facts being reported.

When the information has not been obtained in the course of a professional activity, an additional condition must be met:

4. you must have personal knowledge of the information you are reporting, i.e. you must not be passing on rumours or "gossip".

For further details, please refer to the procedure for managing whistleblowers.

► Protection of whistleblowers

The Maisons de Famille Group guarantees the strict confidentiality of the identity of the whistleblower, the person to whom the whistleblowing relates and the facts covered by the report.

Whistleblowers are treated in complete confidentiality, subject to applicable legal obligations and any administrative or legal proceedings.

No disciplinary, discriminatory or retaliatory measures may

be taken against employees who have made a report, even if the facts are not proven, insofar as these employees have acted in accordance with the criteria set out above.

However, misuse of this system may result in disciplinary action or even legal proceedings.

► How can I access the procedure?

The whistleblowing procedure can be accessed at: <https://groupemaisonsdefamille.whistleblownetwork.net/fr/ontpage>



EXAMPLE OF MISCONDUCT:

An external consultant offers to overcharge me for a service, passing on the overcharged amount and asking me to retain him for a future assignment without issuing a call for tenders.

I must refuse this proposal and report it through the whistleblowing procedure or to my line manager.

FURTHER INFORMATION:



Your Compliance Officer will be happy to answer any questions you may have about this procedure.



Procedure for managing whistleblower alerts

Third-party assessment process

Third-party assessment process Before starting, continuing or renewing a business relationship, it is important to check that the person or company you are going to work with has integrity and is not likely to cause you problems.

To do this, you can use a checklist to assess the risk of corruption, fraud or other unethical offences by your business partner.

This checklist can be obtained from your purchasing department or your compliance officer.

If necessary, this assessment can be completed with the help of your Compliance Officer.

Depending on the results, it may be decided not to work with the person or company, or to continue by taking preventive measures to protect yourself, such as specific contractual clauses, guarantees or reinforced controls.

FURTHER INFORMATION:



The Purchasing Department is available to answer any questions you may have regarding this policy.

Training & Communication

Communications on business ethics (anti-bribery, ethics, conflicts of interest, etc.) are regularly sent to Group employees.

Mandatory face-to-face training is also provided for certain positions.

These go into more detail on the issues addressed in this code, in particular by presenting the resources to be implemented to detect and prevent the risks associated with all the situations described.

Dedicated compliance network

The Maisons de Famille Group has a structured network dedicated to managing the compliance system.

Each of the company's subsidiaries has its own compliance officer, whose primary duty is to implement a compliance policy adapted to his or her area and help his or her colleagues to apply it correctly.

So if you would like a recommendation, advice or to report a difficulty in applying this policy, or for any other compliance-related request, you can confidentially ask your company's Compliance Officer for help.

Contacts

For any information about this policy, please contact alexis.pons-tisserand@maisonsdefamille.com

No changes or updates to this policy may be made without the agreement of the Group General Secretariat.

APPENDIX

