KORIAN GROUP

GROUP ETHICS CHARTER
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The Korian group is built on four key values derived from its work in serving to the elderly and most vulnerable:

> **Benevolence**
Ensuring that consideration for others is a pillar of our business;

> **Responsibility**
Working together to guarantee ageing well for our residents and our patients;

> **Transparence**
Developing trust by communicating clearly and honestly;

> **Initiative**
Developing everyone’s ability to take action.

In accordance with these values, the Korian group gives special importance to the fact that the actions of all are carried out with integrity and ethics. For this reason, this ethics charter (the “Charter”) reiterates the essential behaviours expected from all Group employees during the course of their work, in all circumstances.

Each day, our duty is to act fairly, consistently, and with integrity, while complying fully with the regulations that govern our activities in every country of operation.
The purpose of the Charter is to help every person adopt the proper conduct when faced with difficulties.

I trust that you will take the time to read this Charter, and understand all the procedures and instructions it contains, in order to ensure the highest standards of service for our residents and our patients, while acting ethically and with integrity.

Furthermore, I encourage you to share your concerns, especially regarding ethical matters, and to notify your superiors or the Human Resources Department of any situation that seems abnormal or risky in your opinion.

However, for situations that cannot be handled using the standard procedure, the Group has set up an alert system, to be used by all Group employees to report behaviours they consider as unacceptable or as going against the ethical principles set out in this Charter.

This alert system is described in section 7 of this Charter.

I would like to thank you for everything you do on a daily basis to serve our residents and our patients. Your efforts make it possible for the Korian group to accomplish its mission and respect its values.

Each day, our duty is to act fairly, consistently, and with integrity.
The Korian group Ethics Charter covers a wide range of practices and procedures, from how the Group operates its businesses and cares for residents and patients, to its management methods and relations with third parties.

The Charter defines the Group’s expectations of its employees when making decisions on a daily basis and interacting with other stakeholders.
To whom does this Charter apply?

This Charter applies to all employees, whether salaried or otherwise (hereinafter the “Employees”), of the Korian group and its subsidiaries worldwide, as well as to people working for or with the Korian Foundation for Ageing Well.

It also applies to all company agents and all executive and management committees of the Korian group and its subsidiaries worldwide.

The Korian group also expects its partners to adopt ethical behaviours in line with the spirit of this Charter, particularly in the areas of human rights and working conditions, by adhering to the international laws in force.

How to use this Charter?

The Korian group Charter may apply to a range of situations.

The Charter does not replace the different policies and procedures already in place, notably regarding the security and quality of care or human resources, but provides a general framework for the policies and work rules that have been defined in line with the Charter.

It will be updated regularly, to account for changes to the Group’s businesses and environment.
1.

COMPLIANCE WITH LAWS AND REGULATIONS
All Korian employees must comply with the laws and regulations of the country in which they work. They must understand the laws and regulatory provisions that regulate their professional activity. In particular, these laws and regulations apply to the fields listed below (non-exhaustive list).

**Anti-corruption**

Corruption means requesting, offering, or accepting, directly or indirectly, any offers, promises, donations, gifts, or advantages of any kind, for oneself or for others, to carry out, delay, or fail to carry out a duty required by one's function, mission or mandate.

The Korian group strongly condemns all forms of corruption, whether direct or indirect (through a third party), active or passive, both within the framework of its relations with the public authorities and of its private relations with our different partners (suppliers, healthcare professionals, residents, patients). Agreeing to or receiving any undue advantage, bribe, or illegal payment is therefore forbidden.

For instance, it is forbidden to:

- Receive money or any advantage in exchange for services provided to residents, patients, or families;
- Receive money or any advantage from a supplier or partner in exchange for awarding or renewing a contract;
- Pay money or provide any advantage to a public officer or any other partner with the aim of facilitating the issuance of an operating authorization.

*The situations cited above are only examples and are not meant to be exhaustive.*
Competition

The rules on competition are intended to ensure free exchange on the market and to prevent practices that could distort or hinder free competition. For instance, this may include abuse of a dominant position, pricing agreements, or market-sharing agreements with competitors.

An infringement of competition law may result in serious penalties for the Group and for the employee that committed the forbidden act.

Consequently, employees must ensure compliance with the applicable rules of competition in all circumstances, and make known any action likely to infringe them.

Money laundering

Group employees must remain vigilant regarding large payments in cash or payments made by an individual or a legal entity different from the person with which the contract was established. Such actions could mask attempts to launder money related to criminal activity or tax fraud.

Insider trading

The Korian group is a publicly traded company listed on the Euronext Paris, subject to stock exchange regulations. Every employee with access to insider information is personally obligated to ensure the utmost confidentiality of such information. Insider information relates to specific, non-public information, on the Group or any other company, which is likely to have any influence on the price of Korian’s shares. This information may be financial, strategic, technical, etc.
Furthermore, it is strictly forbidden to use this information for personal purposes and specifically in order to buy or sell (or incite a third party to buy or sell) shares as long as the information has not been made public, under penalty of criminal prosecution and disciplinary sanctions.

**Authenticity of accounting, financial, and tax information**

Employees who, in the scope of their employment, record accounting or financial data, calculate or transmit indicators, or manage and disseminate any other form of information, must provide reliable and accurate information.

In particular, the income and expenses of Group companies must be recorded in accordance with the accounting standards of each country, as well as with the Group accounting standards.

In addition, the Korian group undertakes to complete and archive all the tax declarations necessary for its business, and to cooperate in the event of an audit or investigation from the tax authorities or regulatory authorities.
2. RESPECTING HUMAN RIGHTS AND THE DIGNITY OF INDIVIDUALS
The Group is committed to respecting the fundamental human rights and the principles of the fundamental conventions of the International Labour Organization, in particular the ban on child labour and forced labour, as well as human dignity.

All our residents, patients, and their families, but also our suppliers, partners, and all other stakeholders must be treated with dignity, justice, and respect.

**Promoting diversity and fighting discrimination**

Diversity of talent is an asset for any Group. Non-discrimination and equal opportunity are key values for the Korian group. For this reason, the Group does not tolerate any discriminatory behaviour against an employee, applicant, supplier, resident, patient, or any third party on account of that person’s skin colour, ethnic origin, sex, age, nationality, disability, or sexual orientation.

Every employee is responsible for reporting any discrimination to his or her superior or to the Human Resources Department, or via the alert system.

**Sexual or psychological harassment**

Every person has the right to have his or her human dignity respected, and this principle is a fundamental part of how we work. The Korian group does not tolerate any form of sexual or psychological harassment or offensive behaviour, whether verbal or physical, that could create an intimidating, offensive, or hostile environment in the workplace.

Every employee is responsible for reporting any harassment to his or her superior or to the Human Resources Department, or via the alert system.
Health and safety

Every person working for or with Korian, as well as residents and patients at our facilities and their families, have the right to a healthy, safe, and risk-free workplace or living environment.

All Group employees and third parties are required to comply with the safety procedures in place within our facilities and in any other places where they work. If employees notice any practices that go against the safety procedures, they must report them to their superior or to the local facility director.
Well-being of our residents and patients

The well-being and care of our residents and our patients are at the heart of our priorities and form the foundation of our values.

Korian does its utmost to prevent and limit the health and safety risks that are inherent to dependency care and to the care of elderly people (risk of epidemic disease, climate risks, risk of falls or accidents, etc.).

To guarantee their well-being, Korian asks all employees to respect the preferences, choices, and desire for autonomy of our residents and patients by providing personalised services adapted to their abilities. Additionally, in our facilities, non-drug procedures and therapies are used whenever possible to treat cognitive, functional, or behavioural impairment in individuals with Alzheimer’s or related diseases.
3.

AVOIDING SITUATIONS OF CONFLICT OF INTEREST
As a Korian employee, you are required to safeguard the interests of the Group and of its stakeholders in all circumstances, in compliance with laws and regulations. You must avoid any situation of conflict of interest, meaning any situation in which your action as a Korian employee could be influenced by, or seem to be influenced by, the personal interest that you or your friends and family might otherwise gain.

Each employee is responsible for identifying any situation that runs the risk of placing him or her in a conflict of interest and reporting it to his or her superiors as soon as possible.

The areas that are particularly likely to lead to a situation of conflict of interest are described below.

**Personal investments**

Any personal investment in any of Korian’s suppliers, business partners or competitors could place the person making the investment in a situation of conflict of interest. Any such business ties must be reported to the employee’s superiors.

**Board membership**

Before accepting a board position at another company, employees must consider the potential risk of conflict of interest with respect to their position at Korian and refer the matter to their superiors and to the Human Resources Department.
**Political office**

Employees that engage in political activities must do so in a private capacity, outside the workplace and outside working hours, and avoid getting involved in any cases or areas that may be connected to Korian.

**Family relationships within the Group or with a supplier**

Any family relationships or intimate relationships within a department or with a supplier may create the appearance of a situation of conflict of interest, especially if there is a hierarchical relationship between the two parties. Employees with such relationships must consider whether the situation affects their impartiality and refer the matter to their superior or to the Human Resources Department.
Gifts

Gifts that may lead to a potential or ascertained conflict of interest must never be offered or accepted. As such, Korian employees must comply with internal rules on the acceptance of gifts and on the set monetary limits.
4. MAINTAINING CONFIDENTIALITY
It is of paramount importance that the confidentiality of the information held by Korian be maintained. All employees (salaried or otherwise) must maintain the confidential nature of the information to which they have access throughout their professional career with Korian. It is also essential not to discuss or work on internal Korian information in public places where conversations may be overheard and where the safety of data may be compromised.

This information may relate to:

• The personal data of our residents and our patients;
• Financial information, analyses, and any document on acquisitions, divestments, mergers, commercial leases, or any other transaction;
• Commercial data (price, margins, etc.);
• Strategic information (development plans, strategic guidelines, etc.);
• IT security.

Revealing confidential information in violation of the law or Korian’s internal procedures may result in disciplinary action against the person that revealed the information. Employees will continue to be bound by this confidentiality undertaking after termination of the employment contract or partnership agreement with the Korian group.
**Answering questions from the media**

Only certain individuals are authorised to respond to requests from the media. Any question about Korian, its businesses, its results, or its latest news must be submitted to each country's Communications Department, which will be able to take the necessary action.

The Communications Department in each country must contact the Corporate Communications Department when dealing with data on the Group (Group strategy, financial results,...) and/or sensitive questions.

This provision does not call into question, for each employee, the broader freedom of individual expression within and outside the Group, as long as such remarks do not harm the company's reputation.

This provision does not constitute a hindrance to the freedom of expression of staff representatives.
5. PROTECTING KORIAN’S ASSETS
The purpose of Korian’s assets is to enable employees to perform their duties in order to achieve Korian’s economic objectives.

All employees must use the Group assets responsibly and help protect these assets from theft, destruction, or fraudulent use.

Wasting or improperly using these resources undermines Korian’s operational and financial performance and is contrary to the interests of the Group.

**Use of computer equipment**

Computer equipment is allocated for professional purposes. Although intermittent use of these resources for personal purposes is tolerated, such use must be reasonable and not excessive. It is strictly forbidden to use Korian equipment in an illegal manner.

**Other assets, including medical equipment and pharmaceutical products**

Medical equipment, medicines, and miscellaneous pharmaceutical products represent a significant cost for the Group and therefore must be used correctly to avoid breakage or waste.
6. ACTING AS A RESPONSIBLE CORPORATE CITIZEN
Respect for the environment

The Group’s activities can have a direct impact on the environment (for instance, management of natural resources, waste management). The Korian group respects the environment, and endeavours to reduce its ecological footprint. Every person is responsible for reducing his or her impact on the environment whenever possible (by avoiding unnecessary travel, sorting waste correctly, reducing energy consumption, etc.).

Contributing to the local community

Korian is a corporate citizen, a socially responsible group, and is committed to the communities in which it operates. Group employees are encouraged to play an active role in their communities, in accordance with the ethical principles set out in this Charter.

Responsible purchasing

Korian treats its suppliers fairly, is transparent in the supplier selection process, and strives to build healthy, balanced business relationships.

It is our duty to ensure that our suppliers adhere to our ethical principles, especially with regard to respect for human rights, human dignity, and combating corruption.
7.

ALERT SYSTEM AND QUESTIONS
The purpose of the Charter is to provide broad guidelines on ethics within the Korian group and the proper conduct that is expected in a certain number of situations.

If you have any doubts about proper conduct, or concerns for yourself or another employee about this Charter or the law, you can discuss them openly with your direct supervisor or department manager, your Human Resources director, or submit them through the alert system.

In addition, employees that encounter situations that may violate the principles set out in the Charter, and particularly any employees that encounter cases of corruption, can report the suspected violation through the alert system.

Accordingly, any Korian group employee who knows of a situation or action that violates or may violate any accounting, financial, internal control, competition, anti-corruption or influence-peddling rules under the Sapin 2 Act, or any rules regarding discrimination, harassment in the workplace, or health, hygiene, workplace safety, or environmental protection rules, can report such violations at the following website:

https://korian.integrityline.org

Reporting violations is not mandatory, and abstaining from doing so is not reprehensible. The reporting procedure is not anonymous and must be carried out “in good faith”. By contrast, the Group will not tolerate any retaliatory action taken as a result of a question or report submitted to superiors, the Human Resources Department, or through the alert system.

The Korian group is committed to taking all disciplinary measures and pursuing all judicial procedures in order to prevent or stop any violation of the provisions of this Charter.