



Homecare Alliance
GROUP

-ETHICS CHARTER - INTERNAL AND EXTERNAL

To employees, partners, customers, suppliers and service providers

In Toulouse, Oct 18, 2023 - created by the CSR department and management, the Chairman Validated
by the law firm Sicard "Toulouse".

I – Purpose :

The present Code of Ethics (also called Code of Conduct) of Homecare alliance group defines its values and practices within our group. It complements the group's internal regulations DV-001.

The charter will be implemented once the commitments of both parties have been validated by signature of the document. On the one hand, it serves primarily to set the rules for social and environmental responsibilities between several parties.

Message from the Chairman Thomas Leonarc Ducluzeau.....	2
ARTICLE I. Integrity	3
ARTICLE II. Respect for human rights.....	4
ARTICLE III. Environmental Responsibility	5
ARTICLE IV. Fair Trading	6
ARTICLE V. Anti-Corruption Commitment.....	6/7
ARTICLE VI. Social Commitment	8
ARTICLES VII. Confidentiality	9
ARTICLES VIII. Commitment and sanctions	9
Signature / signature	10

II- Scope of application :

All internal stakeholders (employees, managers, trainees, temporary staff) and external stakeholders (customers, suppliers and partners) are covered by this code of ethics, without restriction or reservation.

Message from the Chairman Thomas Leonarc Ducluzeau

Dear colleagues and team members,

As Chairman of the Homecare Alliance Group, I am delighted to present our new Code of Ethics. This charter is a strong commitment on our part to our core values and to conducting our business in a responsible, honest and ethical manner.

The Ethics Charter is based on the following principles:

- I. **Integrity:** We are committed to acting with integrity in all our business activities. We reject all forms of corruption, bribery or fraudulent behavior. We comply with all applicable laws and regulations, and strive for complete transparency.
- II. **Respect for human rights:** We recognize and respect the fundamental rights of all those with whom we interact, be they our employees, customers, business partners or the communities in which we operate. We fight against all forms of discrimination and harassment.
- III. **Environmental responsibility:** We are aware of the impact of our activities on the environment and are committed to adopting sustainable, environmentally-friendly practices. We promote the efficient use of resources, the reduction of waste and the prevention of pollution.
- IV. **Fair business relationships:** We believe in fair and balanced business relationships. We respect our commitments to our customers, suppliers and business partners. We avoid conflicts of interest and undertake not to take unfair or improper advantage of our market position.
- V. **Commitment to anti-corruption:** We are fully committed to the values of integrity and intellectual honesty, in addition to the HUMAN.es values we have always embraced and which have accompanied us throughout our growth. We apply a "zero tolerance" policy towards corruption and fraud.
- VI. **Social commitment:** We are proud to contribute to the well-being of our employees and society as a whole. We promote a safe and healthy working environment, offering opportunities for development and growth for all. We also support social and community initiatives that have a positive impact.

I encourage you all to read this Code of Ethics carefully and to adopt it as a guide for our daily actions. Together, we can build a company that succeeds economically, socially and environmentally, while preserving our reputation and integrity.

Thank you for your commitment to our ethical values and for your contribution to our collective success.

Yours sincerely,

Thomas Leonarc-Ducluzeau

Article I. Integrity

I-1 : To avoid any harassment or discrimination, and to prevent and deal with any situation of physical or moral violence, intolerance or injustice in the workplace.

I-2 : Avoid any discriminatory, racist or offensive behavior towards another person.

I-3 : Listen attentively and empathetically to the points of view of others, even though they may differ from our own.

I-4 : Recognize our responsibilities to the community and commit to acting ethically and responsibly in all our dealings.

3

I-5 Practice zero tolerance of all forms of fraud, corruption and unfair competition.

In accordance with article L1132-1 of the French Labor Code (discrimination)

https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000042026716/

According to article 433-1 of the penal code (corruption)

https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000039113360/2019-09-20/#:~:text=sommaire%20du%20code-,Article%20433%2D1,-Version%20en%20vigueur

Article II. Respect for human rights

II-1 Respect the dignity of each individual, recognizing his or her value and unique contribution to society.

II-2 Respect everyone's political, trade-union and religious opinions, provided their expression does not infringe laws and regulations.

II-3 Respect the rights of the child which, according to article 32 of the International Convention on the Rights of the Child, "States Parties recognize the rights of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development".

II-4 Respect employees as individuals and their rights, and base our professional relations within the Group on listening, dialogue, trust and team spirit. The Group's values are : Listening (family spirit), Strength (surpassing ourselves together) and Growing together (serving one another together).

4

<https://archive.crin.org/fr/accueil/les-droits-de-lenfant/la-convention/articles/article-32-travail-des-enfants.html>

Article III. Environmental responsibility

III-1 Applying local regulations on the storage and use of chemical substances and reducing our impact on the environment (energy consumption, waste sorting and pollution control).

III-2 Identify the Group's environmental and social responsibility issues and manage the environmental impact of our activities.

III-3 Assess all the costs and impacts of a product's life cycle

III-4 Report any abnormal situation that could affect the local environment

III-5 Be responsible for our waste production in order to achieve recovery or elimination.

5

III-5 Stakeholders undertake to respond to the Group's requests to assess carbon footprint calculations and data requirements for the sole purpose of a CSR approach.

<https://www.legifrance.gouv.fr/affichCodeArticle.do?idArticle=LEGIARTI000006444056&cidTexte=LEGITEXT000006070721>

In accordance with article 1833 of the "Loi Pacte"

In accordance with Article L225-35 and Article L225-64 of the French Commercial Code.

Article IV. Fair business relations

IV-1 Our approach is based on active listening and impartial action, guided by the principles of fairness and transparency, towards all the stakeholders who make up our ecosystem: customers, suppliers, partners, shareholders, associations and public authorities.

IV-2 We are committed to ensuring the fluidity of the settlement processes linked to our business model, while making our suppliers aware of the need to submit their settlements within reasonable deadlines, in order to avoid any surcharges or organizational difficulties.

IV-3 We maintain a solid and constructive relationship with our 120 registered suppliers, in which compliance with all contractual terms and conditions is of paramount importance.

IV-4 We make it a point of honor to share with all our stakeholders, on a daily basis, information deemed relevant and verifiable in our mission.

Our relationships with suppliers, partners, service providers and the Homecare alliance group are based on listening and trust.

Article V- Anti-Corruption Commitment

6

V-We have always demanded rigorously ethical conduct from ourselves, and will continue to apply the same standards in the future. And because we believe in the future and in our development plans, we vow never to give up, and always to demonstrate the same integrity to our customers and partners.

V-1-LD MEDICARE, including Homecare alliance Group, undertakes to proscribe all forms of corruption and influence peddling in its relations with customers and suppliers.

V-2 It is strictly forbidden to offer gifts in the hope of obtaining a more favorable agreement, to accept gifts from a supplier or customer wishing to influence a commercial decision, or to use one's influence to obtain an advantage or a favorable decision.

V-3 Gifts can take various forms, such as: material goods, services, promotional offers, product discounts, or even invitations to events or holidays.

In practice:

- Refuse any gift whose value seems excessive, or whose reciprocity you cannot assume.
- Refuse any benefit or gift which, because of its nature, value and/or frequency, could lead to an ethical dilemma.
- Refrain from offering a gift that could give the impression that you are trying to influence a business decision, or whose value could appear excessive.
- It is strictly forbidden to offer or accept gifts consisting of a sum of money, particularly cash.
- Inform your referent of any gifts you offer or receive.

Explanation:

Gifts offered or received from customers, suppliers, service providers or partners are not in themselves reprehensible, provided :

- they are of low value,
- they are non-recurring
- they do not in any way influence or give the impression of influencing a commercial decision.

Providing a third party with a service free of charge or at a significantly reduced rate in exchange for the promise of a future assignment may constitute bribery or influence peddling.

7

In detail:

- BRIBERY :

- Active bribery is the act of granting or agreeing to grant an advantage to a person so that he or she performs or refrains from performing an act of his or her function with a view to furthering the briber's interests.
- Passive bribery consists in accepting or soliciting such an advantage.

- INFLUENCE PEDDLING :

Influence peddling consists in asking a person, in return for payment, to use his or her real or supposed influence over another person in order to obtain an advantage or a decision (active influence peddling), or to agree to use his or her influence or to solicit payment in order to influence (passive influence peddling).

Any act of corruption committed in France or abroad is strictly prohibited.

The functions of the bribe-taker may be public or private, but their public nature will entail a heavier penalty than that laid down for private bribery. It is also a punishable offence to be aware of actual or possible violations and to do nothing to verify their existence, or to put a stop to them.

Article VI. Social Commitment :

V-1 Acting for the community and promoting social cohesion within the Group.

V-2 Promote access to knowledge and the transmission of knowledge within the Group.

V-3 Ensure the health, safety and personal development of those involved in our activities.

8

V-4 Protect tangible and intangible assets, handle sensitive information responsibly and safeguard personal data.

V-5 Promote social dialogue to ensure fair and equitable treatment of all employees.

Article VII- Confidentiality

No personal or private data shall be disclosed.

No commercial data may be divulged.

All information concerning the HOMECARE ALLIANCE GROUP and its associated entities is strictly confidential and may not be divulged in any way whatsoever.

Article VIII- Commitments and sanctions :

After reading and understanding the ethical charter as a code of conduct between stakeholders, each party undertakes to apply it without reservation.

Means may be implemented to verify compliance with the commitment entered into.

Sanctions may be taken if breaches are observed.

- Internally: in line with internal regulations (DV-001)
- Externally: suppliers, partners, service providers, customers

VIII-1 Scale of sanctions :

- 1st failure to comply with the charter: We require you to implement corrective actions and provide proof of their effectiveness.
- 2nd failure to comply with the charter: if other agreements have failed: non-renewal of the agreement with the supplier, partner, service provider or customer concerned.
- Persistent failure: may lead to termination of the contractual relationship, accompanied by an action for payment of damages.

Partners / Suppliers (company name, date) / Signature

"Undertakes to apply the ethical charter of the Homecare alliance group in its entirety"

Employees (company name, date) /signature

"Undertakes to apply the ethical charter of the Homecare alliance group in its entirety"

10

HOME CARE ALLIANCE GROUP management, date / signature

"Undertakes to apply the ethical charter of the Homecare alliance group in its entirety".

SAS HOME CARE ALLIANCE GROUP
7 RUE JEAN DE GUERLINS
31100 TOULOUSE
SIREN : 327 958 109

LD MEDICARE
11 rue du Crieu - ZA GABRIELAT
09100 PAMIERS
Tél: 05 67 44 70 80
SIRET : 818 127 938 000 46

