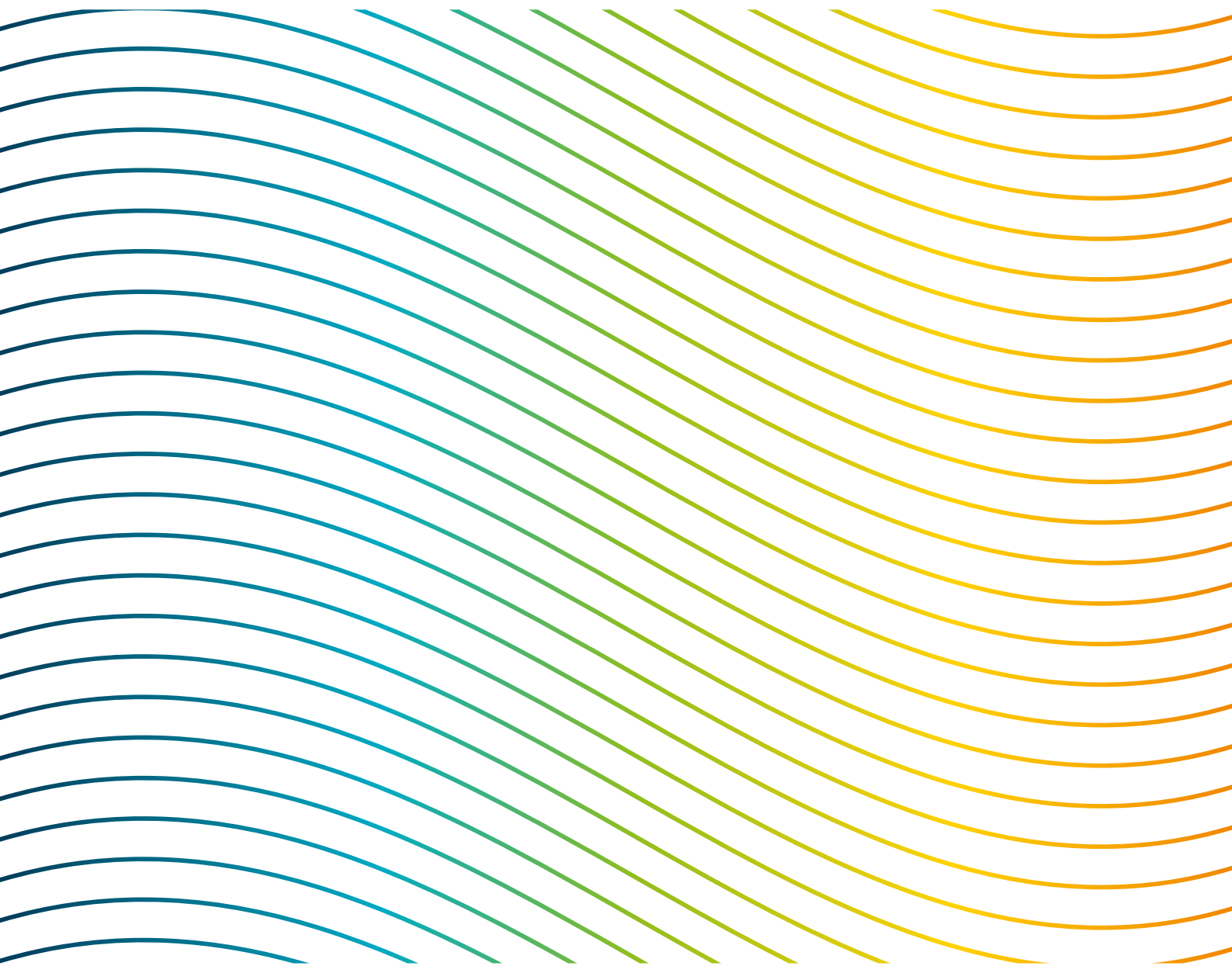


clariane

Our ethics charter





Trust

Responsibility

Initiative

Foreword

We, the women and men of Clariane, whatever our profession and wherever we work, are all utterly dedicated to our purpose «Take care of each person's humanity in times of vulnerability».

This mission, which underpins the professional commitment shown by each of us, is reflected in our Group's three values of Trust, Responsibility and Initiative. It nurtures our corporate culture.

I want every one of us to be able to uphold these values with pride and embody them in our daily lives through the "Clariane attitudes". These attitudes are our common good, the essential condition of the quality of the support and care we provide to those who entrust themselves to us. They express what we are and the commitment we make to all our stakeholders. They carry the future of our Group.

Our Ethics Charter illustrates these Clariane attitudes in a very concrete way to help us to live up to them and keep them alive. This document, put together from many testimonies and contributions from Group employees across Europe, is our reference text to inspire and guide our daily actions and help us when faced with complex ethical situations.



It is everyone's responsibility to comply with this Charter.

I invite you to take ownership of this Charter and refer to it regularly, alone or as a team.

I know that you care deeply, just as I do, about the dignity of the patients and the people we support, and I thank you for the commitment you demonstrate day after day. Together, we are helping to meet the vital healthcare needs of our fellow citizens.

Sophie BOISSARD,

Chief Executive Officer of the Clariane Group

Foreword

Our Clariane Ethics Charter

An Ethics Charter, or Code of Ethics, is a document in which an organisation officially sets out its values, ethics policy and corporate culture. Our Ethics Charter helps us to carry out our purpose «Take care of each person's humanity in times of vulnerability».

This Charter, which is aligned with Clariane's three values, sets out our social and societal responsibility towards all our stakeholders which we reaffirm through our status as Purpose Driven Company. Our Charter allows plenty of leeway for individual consideration and promotes trust and independence. It provides bearings that can guide our decisions, particularly when dealing with complex situations.

Clariane's DNA is based on the three fundamental VALUES that underpin our strategy: Trust, Responsibility and Initiative. In the Charter, each of these values is illustrated by three attitudes, which are translated into guidelines and examples of specific situations. The guidelines reflect the attitudes that we want to promote in our work practices every day. They reflect the standards that our Group and our employees agree to meet when dealing with all our partners.

In our line of work, we often face delicate situations, particularly because of the fragile nature of the people in our care. Some of these situations will be used here to illustrate our guidelines. Because every decision we make occurs in a specific context, we all need to adopt the ethical mindset intended by this

Charter. This will enable each of us to do the right thing at all times as part of our job and our role within the company. This will also help to reinforce the strong organisational culture that we all share.

Keeping within the framework of this Charter will allow us to provide better service, safeguard our actions, and consolidate the relationships we have among our teams and with our partners. This framework is intended to help all of us to thrive in our work.

This is mentioned in their employment contracts. In order to formalise their commitment to having read and to comply with it, each employee signs a document entitled "Our Values and Ethical Commitments", which summarizes the guidelines set out in the Charter. presented and given to all Group employees during their induction.

The Charter is also available on the websites of the Clariane Group and its subsidiaries.

We are always open to suggestions on how we can make it better based on any suggestions that we may receive which you can send us through your Human Resources or Compliance contacts or by sending an email to compliance@clariane.com.

The Ethics Charter's Scope of Application

Our Ethics Charter is a reference document for all employees within the Clariane Group and its subsidiaries. Everyone is required to read it and follow it.

We share it with all our partners, regardless of their position or status, to help them better understand our vision and culture, and so that they may apply it in any dealings they have with Clariane.

The Ethics Charter is presented to all Group employees on their induction.

All the principles in this Charter are in line with the laws and regulations of the countries in which the Clariane Group operates. More specifically, these principles are taken from the following international agreements:

- the Universal Declaration of Human Rights of 1948;
- the International Labour Organization's Fundamental Conventions;
- the OECD Guidelines for Multinational Enterprises;
- the United Nations Global Compact;
- the United Nations Convention against Corruption;
- the World Health Organization (WHO) Principles;
- the OECD Convention on Combating Bribery of Foreign Public Officials;
- the European Charter of Fundamental Rights (18-12-2000) ;
- the European Charter of Patients' Rights (22-10-2009);
- recommendation Rec(2004)10 of the Committee of Ministers of the Member States concerning the protection of the human rights and the dignity of persons with mental disorder ;
- the European Charter of the rights and responsibilities of older people in need of long-term care and assistance (June 2010).

Finally, this Ethics Charter has been drawn up in accordance with the Clariane Group's principal frames of reference, which are:

- our corporate social and environmental responsibility (CSR) strategy;
- our ISO 9001 standards;
- the Charter of Reciprocal Commitments, where applicable;
- the Management Charter produced by care home managers on the S.Keys training course;

Foreword

The Company's Expectations

We expect everybody, regardless of their job, title or rank in the organisation, to:

- read the Ethics Charter and our ethical commitments;
- sign the “Our Values and My Ethical Commitments” document to confirm that they adhere to Clariane’s ethical approach;
- apply the Ethics Charter daily and ensure that others in the workplace do the same;
- always strive to set a good example, even more so for those in charge of a team;
- swiftly report any situations they are concerned about by any of the channels available, starting by informing their line manager;
- help to address ethical issues as a group;
- undertake a continuous improvement and communication process when dealing with ethical issues.

The Company's Commitments and Implementation Methods

To help ensure that our Ethics Charter is implemented, the Clariane Group:

- encourages its employees and partners to voice their thoughts about the services provided and the way they are delivered in our care homes, and to speak up if they feel that any of the principles set out in this Charter have been breached;
- will acknowledge and act on any information or situations reported in this regard, and inform the persons concerned;
- if a person feels that they may incur negative consequences because of reporting a situation, the Group undertakes to:
 - reassure and protect the person, if necessary;
 - ensure they remain anonymous if they so wish.

By voicing our worries and concerns, we can protect the people we care for, our colleagues, and our Group as a whole and help to ensure that we carry out our mission as required. That’s why Clariane has introduced a whistle-blowing system that can be used to report any type of behaviour that goes against the rules of good conduct that underpin our values and commitments.

If you have any concerns, it is important to contact the following people immediately, depending on the nature and seriousness of the issue:

- your manager, HR officer, or workers' representative;
- the Department in charge of managing the whistleblowing system;
For the Group: Security, Ethics & Crises Department – Clariane alert@clariane.com or by post at: 21-25 rue Balzac, 75008 Paris, France;
- **For France:** France Legal Department – Compliance Division alerte@clariane.fr or by post at: 21-25 rue Balzac, 75008 Paris, France;
- Group Compliance Department compliance@clariane.com or by post at: 21-25 rue Balzac, 75008 Paris, France;
- report the matter using the Group's online whistle-blowing system accessible by following the QR Code:



The platform is open to all.

In particular, a procedure for collecting and processing alerts is available to all employees.

All flags received will be dealt with confidentially, whether anonymous or not. We take a zero-tolerance approach to reprisals against whistle-blowers. Any type of retaliation would be grounds for disciplinary action that may result in the dismissal of the person that conducted or instigated it. Reporting an incident is not compulsory and will not be sanctioned. It is a serious process which must be undertaken with full awareness and in good faith

All managers must ensure that the employees they supervise are aware of all these resources.

Foreword

The Clariane Group Ethics Charter is underpinned by our three cardinal values and the attitudes inherent to them. It establishes a strong and clear connection between the values, the ethical behaviour expected, and the guidelines to be followed in our daily work.



TRANSPARENCY P12

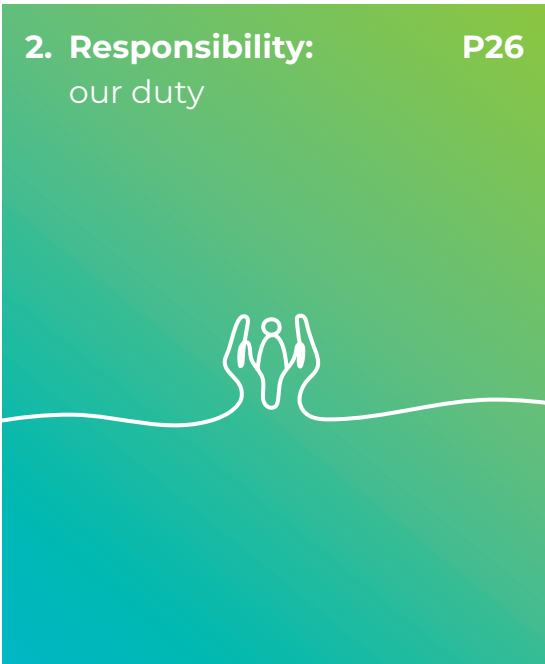
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1. Trust: our connection

TRUST means being able to rely on other people. We need to have trust in all our relationships.

By saying what we do, doing what we say, and setting a good example, we build trust over time. Trust is based on sharing the same values and

attitudes. It makes us feel secure, gives us peace of mind, and motivates all of us to give our best.



TRANSPARENCY

Being transparent means saying everything that can and must be said, clearly and accurately.

People trust us because we are transparent.

However, that trust also requires us to keep sensitive information confidential and respect the privacy of our patients, residents and employees.

BENEVOLENCE

Benevolence means wanting what is best for other people. It is the very essence of our profession and our positive care approach.

Being benevolent means being there for the people we care for and responding quickly to their needs. It requires us to always be attentive, kind, available, and often patient. It is easier to be benevolent if we have good self-esteem, a healthy work environment, and are part of a positive and supportive team.

Benevolence also applies to managers and relationships with other professionals.

EMPATHY

Empathy means putting yourself in another person's shoes to understand them better. It enables you to imagine how they are feeling, what they want or need, or simply understand why they feel the way they do.

Empathy helps us to act in the most appropriate and effective manner when supporting or caring for people. It also improves the way we communicate with the families and our colleagues.

TRANSPARENCY



Honest and proactive communication

We provide honest, reliable, accurate and understandable information.

✓ I will:

- Initiate and promote constructive dialogue in all circumstances and share this information regularly with everybody I deal with.
- Use clear language and check that the other person has fully understood the information.
- Always communicate accurately and in good faith.
- Encourage others to say what they really think.
- Express my point of view, expectations and queries clearly, and share my feelings.
- Inform residents, patients, and their families about any changes or events that could impact the services provided, even if only temporarily.

✗ I will not:

- Lie or embellish the truth.
- Put off providing information or conceal a dysfunction to protect a colleague.
- Ignore critical comments from patients, residents or their families.
- Use hurtful words or communicate in a hurtful way.
- Breach patient confidentiality or privacy guidelines.



Honest and proactive communication

• Dealing with patients, residents and their families

Due to the unexpected absence of one of the care assistants, the morning rounds are taking longer than usual. One resident's daughter has just arrived and is complaining that her mother is still not ready, because she usually is by now. The daughter is quite aggressive. How should I react?

It is important to always tell the residents and their families the truth. Telling the truth shows that they can trust us and have faith in us. We do everything we can to provide the highest level of care. There may be occasions, however, when we need to deal with logistical issues. You should explain to the resident and her daughter what the team is doing to make up for your colleague's temporary absence.

One of my colleagues forgot to give a patient their medicine. I checked with the patient's doctor, who said that this oversight won't have any consequences on the person's health. The patient is not capable of realising that this happened. A relative who has been given consent to discuss the patient's health has come to visit today and, as usual, has asked me if everything is okay. Should I mention this matter?

Yes, of course. To not mention it would be lying by omission, which does not fit with our commitment to being honest and our value of trust. You must tell the family about it and at the same time reassure them. If necessary, you can invite them to contact the doctor

directly. This information should also be recorded in the appropriate software and an adverse event report should be written up.

Somebody calls the facility to ask about a patient's health. She says that she is calling on behalf of the patient's family. Can I give her this information?

Regulations state that information about the health of anybody living or staying at one of our care homes cannot be disclosed to a third party without express permission from the patient. Therefore, you can only answer the enquiry if the patient has agreed that information may be shared with that person, or if they agree when asked.

The test results of a resident with cognitive impairment have revealed a new and quite serious condition. We don't know whether he will be able to understand this information, nor how he might react to the bad news if so. Should I tell him anyway, even though he may have difficulty understanding??

This information will be given to him by a doctor. Our duty to inform the person is the same for everybody we treat or care for, and their right to such information is upheld whatever the condition of their health. However, they will be told in a way that is appropriate to their level of comprehension.



Honest and proactive communication

• Dealing with colleagues

My boss has just assigned me a new task. He was in a rush and didn't take the time to explain exactly what I must do or when it needs to be done. I'm also not sure what resources I can use for it. Should I go back to him to ask for more details?

Yes. Everybody, especially managers, must provide a clear explanation of any jobs that need to be done or any projects a team is assigned to work on. The explanation should include the purpose of the request, the end goal, how it should be done, the resources provided, and the timeframe expected. These details are essential for duties to be carried out properly.

Listening to and supporting their teams is an essential part of a manager's role. It is important to talk to your manager about any difficulties you might experience.

The annual appraisal is an opportunity to have a more in-depth conversation about the quality of the work done over the previous year and objectives for the year ahead.

I notice that the care assistant in charge of a resident has not provided the help requested (being changed, a glass of water, moved to a chair, etc.), despite repeated requests. How should I react?

This sort of attitude is unacceptable. Tell your colleague what you think of his behaviour and take care of the resident yourself, making sure to apologise to her. Then report it as an adverse event so that your superiors are aware of it.

• Dealing with public or regulatory authorities and internal or external auditors

As I was getting a resident out of bed, I noticed quite a large bruise. Nothing was reported in the verbal handover or in the care management software. The colleagues I asked said they hadn't seen or heard anything. What should I do?

Inform the nursing manager straight away and report it as a serious adverse event. This sort of thing must be looked into so that the necessary preventive measures can be taken.

The authorities are conducting an inquiry at my care home due to a patient's complaint. I have been asked to provide a set of regulatory documents. I notice that some of them are missing or have not been updated. What should I do?

Submit the documents that you have, as they are. We are always fully transparent when dealing with public authorities or inspection bodies. You should also report the non-compliance issues to your manager, along with an action plan for rectifying the matter.



Reliability and traceability

All the documents, reports, and declarations we produce and send out are kept up to date in a reliable and accurate manner.

✓ I will:

- Thoroughly trace any information that needs to be traced.
- Pass on information that has been verified.
- Always use the company's software solutions.
- Take the time required to write up information properly so it can be easily understood.
- Be honest when declaring any type of information, particularly concerning working hours or business expenses.
- Be vigilant about the quality and legitimacy of any accounting documents produced or used.

✗ I will not:

- Note down any information "off the cuff" just to get it out the way.
- Hold back any information because it would lead to doing extra work, such as providing an explanation.
- Alter any information to benefit personal interests.
- Confuse the reporting of something that's not right (with the intention to improve) with denunciation (with the intention to harm).

TO LEARN MORE ABOUT THIS: you can read the Group's procedures for dealing with adverse events and complaints.

I travelled a lot last month but seem to have misplaced some of the receipts I need to claim back my expenses. Can I declare some fictitious expenses for amounts small enough to not require a receipt, to make up the total amount?

No, this would not be acceptable, even if you're not asking to be reimbursed for more than you spent. It would mean that the expense report is not accurate, so our account books would not be accurate either. Everybody is required to keep their receipts and submit legitimate reports.

A family told me that they were very happy with the way their relative is being cared for at our home. I'd love for them to post this positive review on the internet. What can I do?

We understandably feel great satisfaction and pride when our work is appreciated by our residents, patients and their families, and we like people to know about it. You can suggest that the family post a positive review on the internet, as long as you don't put any pressure on them, help them, or do it for them. Reviews are only credible if people write them of their own accord and if they accurately reflect the person's experience. All opinions expressed must be received and considered. The quality of the care we provide is what will ensure that our clients are satisfied and recommend us.

BENEVOLENCE



Respect and dignity

We are respectful and dignified when working with patients, residents, families, our colleagues, and anybody we are in contact with. We treat them in the way we would like to be treated ourselves. We show the same level of respect when we talk about them in their absence.

✓ I will:

- Respect all people equally, regardless of their social status, rank, culture, personal situation or lifestyle choices.
- Be kind, polite and punctual, which are the basic forms of respect.
- Be attentive to other people's needs and try my best to fulfil them.
- Be understanding, tolerant, constructive and accept that everybody has the right to make mistakes.
- Respect the habits and routines of the people we care for.
- Always respect the privacy of our residents and patients.
- Talk to my colleagues and/or my superiors if I experience any difficulties or am not shown due respect.

✗ I will not:

- Criticize the patients, residents, their families or my colleagues.
- Make fun of people because of their personality or difficulties.
- Leave a resident or patient waiting when they need care.
- Provide personal care where other people can see.
- Use overly familiar language with a resident or patient without their consent.
- Ignore a colleague when asked a question.

At the home I just started working at, several residents talk to me in a very familiar way and some of them have even given me an affectionate nickname. Can I do the same with them?

No. You should always be professional and respectful while still showing kindness. This means not speaking to residents and patients in an overly informal manner and maintaining a professional boundary.

Two workers are in conflict and cannot talk to each other without being hostile or aggressive. Some days it's worse than others. I have just watched them have another argument and insult each other. What can I do?

You should intervene and report the situation as an adverse event. Tension between colleagues has a negative effect on the team and on the quality of care and support we provide. The management needs to be aware of this so that it can be resolved, for everybody's benefit.



Respect and dignity

The children of a resident, who is in a protected unit because she has severe cognitive impairment, have complained to my team about their mother being dressed in jogging bottoms. They say she has never worn trousers in her life, let alone jogging pants. However, this lady never complains when we dress her like that. We feel that these clothes are comfortable for her and easy to put on. Yet her children are saying that this clothing is disrespectful to her. Are they being unreasonable? What should we do?

No, the opinion of this lady's children is not unreasonable and must be taken into account. As their mother is unfortunately no longer able to express her own choices or opinions, they are simply trying to explain her preferences and her style of dress to maintain her image and dignity. You and your colleagues should respect the family's request if the clothes the resident wears are appropriate to her state of health, do not hinder her movements, and are comfortable.

While going down the hallway of the clinic where I work, I pass an open door and see a post-op patient lying on her bed partly undressed. She is obviously unable to cover herself up without help. This lady is not my patient. What should I do?

You should certainly help the patient immediately, regardless of your role. Respecting the privacy and dignity of the people in our care is paramount.





Treating people well

We will not tolerate any form of abuse, violence or harassment.

Treating people well, with respect and consideration, is at the heart of any care relationship. These relationships are developed every day, in everything we do.

✓ I will:

- Show kindness in my words, attitude, facial expressions and actions.
- Report any psychological or sexual violence, abuse, harassment, or any inappropriate behaviour that I witness.
- Use non-medicinal therapies and approaches whenever possible to treat cognitive, functional, or behavioural impairment among patients with Alzheimer's or similar diseases.
- Be willing to help and support people in difficulty.
- Adopt an attitude that is conducive to creating a sense of well-being in the workplace.
- Talk to my manager if I feel exhausted or am about to reach a breaking point.

✗ I will not:

- Use underhand methods such as threats, intimidation or insisting to the point of harassment to achieve an objective or complete a task.
- Used veiled jokes to hurt or stigmatise people.
- Display impulsive behaviour, inappropriate or insulting verbal outbursts, or brutal movements.
- Protect somebody who intentionally wrongs another person, whether actively or through neglect.

TO LEARN MORE ABOUT THIS: you can read the Clariane ISO 9001 standards for your sector.



Treating people well

I regularly get calls from a man who looks after his mother-in-law, whose health is failing. He is very aggressive. His constant and unjustified criticism of the team and his claims that they “don’t know what they’re doing” are very upsetting. Actually, we are doing everything we can to offer this lady comfort and relief. What should I do?

Try to establish a benevolent form of communication by inviting this person to meet with the multidisciplinary team that cares for his mother-in-law, to clarify the situation and explain everything that is being done for her. Confrontation will not help anything in this type of situation. However, it is important to emphasize encouraging mutual respect to build a trusting relationship.

In meetings, my boss frequently criticizes the work of one employee in front of the whole team. This colleague doesn’t reply to my boss’s remarks, but it seems to really upset him. Should I do something, even though it’s not my problem?

This type of managerial behaviour is neither constructive nor justifiable. Managers must set an example.

The role of a manager is to unite, support and motivate their team so that they can do their jobs well. While the manager is entirely within her rights to assess the employee’s performance or to comment on it, she must also treat her team with respect and act in an appropriate manner.

You should invite your colleague to talk to your boss or the appropriate HR person about it. If he doesn’t and the situation arises again, then you should report it to HR yourself.

The Group regularly talks about benevolence and a zero-tolerance approach to violence, abuse, sexual harassment and bullying. It is not always clear what bullying means. So, what does the term bullying cover exactly?

Each of the countries where Clariane n operates has its own legal definition of moral harassment or workplace bullying, and its own sanctions and remedial procedures which our Group complies with.

Although these laws are specific to each country, they all set out to prevent the following behaviours from happening or reoccurring in the workplace. The behaviours on this non-exhaustive list are inappropriate and go against our values, whether or not there is a line of command or a functional relationship between colleagues:

- Words and actions intended to hurt or upset someone;
- Any form of humiliation or intimidation;
- Any form of reprisal, such as being: physically or socially excluded or overlooked; demoted or prevented from progressing in your career; denied access to training or meetings;
- Willingly causing someone to make a mistake by putting them under duress, giving them contradictory instructions, or moving the goalposts for no reason.



Non-discrimination

We promote diversity and inclusiveness among our staff and those we care for.

Every person is unique, which is what makes interpersonal relations so rich. We ensure that diversity and equal rights are respected. We will not tolerate any form of discrimination.

✓ I will:

- Report any instances of discrimination that I observe.
- Intervene if I witness any discriminatory remarks or attitudes towards our residents or patients, their families, or our staff, no matter who makes the remarks.
- Demonstrate support and solidarity towards anybody on the receiving end of discriminatory remarks or attitudes.
- Hire staff purely based on their skills, experience and personal abilities.
- Ensure that employees receive equal opportunities and equal pay throughout their career.

✗ I will not:

- Pick and choose who I give time to, based on non-work-related criteria.
- Think or speak based on prejudices.
- Spend all my time with a group of people who are like me.
- Form judgements of people based on their origin, appearance or a minority group they belong to.
- Make inappropriate comments about people in public because of their origin or background.



Non-discrimination

I am dealing with a patient who says that he refuses to be treated by a person of colour. How should I react?

This situation is not acceptable as a matter of principle. You should talk to your manager, who will decide on the appropriate action to take, particularly regarding this patient's discernment and his comments.

A new care assistant has just been hired for my team. My male colleagues say that he is "effeminate". Because of this, they imitate him when he is not around, don't include him in their conversations, and sometimes make it clear to him that he doesn't belong. How should I react?

This attitude is disrespectful and is not in line with our values. Tell your colleagues that you don't agree with it. Talk to your line manager so that she is aware and can act to stop this type of behaviour, and so that your colleague can work in a comfortable environment.

At a residence for the elderly that is made up of shared units, one of the tenants has asked to move to a different apartment. She can't stand sharing with a person with a disability while she is still able to get about and perform various activities of daily living on her own. What should I tell her?

We try to accommodate the needs, lifestyles and personal preferences of our residents. However, the very notion of shared accommodation means that everybody must value and demonstrate tolerance. Granting her request may not solve the underlying issue.

One of my male patients refuses to be washed or dressed by a woman. He says that it is goes against his religious beliefs. Should I take his preferences into account?

Everybody's religious beliefs should be respected as far as possible within the limits of our resources and work methods. Therefore, if a male attendant is available, it would be best to comply with the patient's wishes. However, if there are no male attendants available, then it is entirely justified to tell him that he cannot be assisted if he refuses to be washed or dressed by a female attendant. This type of intervention should never be imposed unless it is a life and death emergency.

EMPATHY



In Caring Hands

We take care of everyone.

Taking care of people means:

- Striving to satisfy the wants and needs of residents, patients, and their families, in a way that is specific to them alone.
- Developing dialogue and unity within our teams and having a management team that supports our employees.

✓ I will:

- Be attentive to other people's needs by using active listening skills and giving them my time.
- Always be willing to discuss things.
- Pay special attention to help new residents, patients or colleagues to settle in.
- Offer support to colleagues who need it – for example, if they need to change their work hours for family reasons.
- Let a manager know if it seems that a colleague isn't very well.

✗ I will not:

- Be detached or contemptuous of workers who do other jobs.
- Require people to work under conditions that do not suit them, if I can help it (e.g., shift times).
- Talk to a colleague or answer the phone while I am attending to a patient or resident.
- Exclude new workers or leave them out.

TO LEARN MORE ABOUT THIS: you can read our in-house documents and look into training courses on positive care and non-medicinal interventions .

While attending to a patient/resident, one of my colleagues asks me how my children are. Can I answer her?

No, wait until you have finished caring for the patient/resident and have left the bedroom. Not paying attention to the person while attending to them in a 'mechanical' way without really engaging with them is not aligned with our positive care ethos. This would be missing the point of the job-an insidious form of neglect that is not obvious.

A patient always wants to sit in a certain place at mealtimes, but it is complicated because he gets quite agitated. Also, the place he wants to sit is in the main aisle, which means that he is in the way. When I told him that he couldn't sit there, he insulted me. What should I do?

It is essential to respect the habits and wishes of our residents and patients. However, if it is not possible to satisfy their request and if a behavioural disorder means that they are unintentionally difficult, then it is important to stay calm and try to understand what they need. You can also get your manager involved if needed.





Respecting and maintaining independence

We strive to help our patients and residents maintain their abilities, independence and lifestyle choices.

Dialogue with patients, residents and their families is essential. We must respect their wishes and always try to obtain their informed consent, even if we don't necessarily agree with their views or their decisions. We ensure that patients and residents preserve their abilities as much as possible.

✓ I will:

- Ask a person (or their family) about their habits and desires..
- Use the means available to gain a better understanding of a person's abilities (such as the patient abilities matrix).
- Ask for and obtain patients' informed consent, bearing in mind their right to refuse care.
- Encourage residents' freedom to move around and avoid using straps wherever possible.
- Ask residents about their wishes and instructions in advance.

✗ I will not:

- Do things for people that they can do themselves.
- Not bother explaining a care procedure to a patient because I assume they won't be able to understand.
- Impose a care procedure or activity on anybody.
- Think I know better than a resident what is good for them.
- Treat dependent people like children.

We have a lady who used to wander about a lot. Her health has declined, and she doesn't have the strength in her legs to walk. Her doctor initially prescribed a wheelchair with a harness to prevent her from trying to walk and falling over. However, she found the harness distressing. She kept trying to get up and sometimes managed to do so, putting herself at risk of falling over. So, the wheelchair was changed to a comfort wheelchair for added safety. But now she tries to "escape" by sliding under the tray on it, or by removing the tray. When she succeeds, she also falls. What is the best course of action?

This situation raises a dilemma between respecting her freedom to come and go, by limiting the use of straps, and ensuring her safety. The use of straps and harnesses is to be avoided as far as possible, especially if it causes mental distress or anxiety. Using a comfort wheelchair will avoid this and requires more vigilant supervision. In some cases, the family may be able help with the extra supervision if they are available. In any case, you should see what the medical team (her appointed nurse or coordinator, doctor) recommends to find the best solution, which is likely to change over time and should be decided with the team who look after the resident.



Respecting and maintaining independence

I have just started working at the care home and I help to serve meals. This is my first job. I've noticed that some residents who are still able to use a knife and fork are fed by the staff, even though they haven't asked for any help. What should I do?

We organise ourselves the best we can to do things 'with' residents without doing those things 'for' them, because being active helps to maintain their abilities. In this case, you should let the residents eat by themselves, take their time, and invite your colleagues to do the same. You could also suggest discussing the matter as a team, with your manager.

I care for a person whose health is rapidly failing. She tells me that she just wants to be left alone and doesn't want to leave her room. Her family is worried about her being so inactive and keeps asking us to stimulate her and to get her to join in the activities. Should I go along with the family's request?

We can understand the anxiety experienced by families when a relative nears the end of their life. However, the elderly person's well-being takes precedence over everything else. A meeting between the family and the GP, with input from a psychologist, should help the family to understand the situation and help them to focus on the needs of the elderly person.

I have found out that two consenting residents are having a sexual relationship. They often ask us for help to get to each other's rooms and then to be left alone. The staff are unsure about how to deal with this and whether they should inform the families of the two residents or not. Should I try to reason with them and tell them to stop it due to their age? Should I inform their families?

We must respect their feelings and use our discretion. The private life of the residents concerned must be respected, and you need to make sure that the team does so. There is no need to inform or consult their families.



2. Responsibility: our duty

Clariane's mission is to care for and accompany elderly or vulnerable people and their loved ones, and to contribute to their dignity and quality of life. This puts our responsibilities and ethical obligation at the heart of the work we do every day.

RESPONSIBILITY implies two things:

- **ACTING** responsibly, feeling involved, and engaging voluntarily;
- **TAKING ON** responsibilities, which means accepting the consequences of our actions.

Responsibility requires us to think about the impact of our decisions and our actions.

It encompasses the notion of professionalism, both as an individual and as a group. Every member of a team is responsible for ensuring that things go smoothly.

Finally, our responsibility is multi-fold. It encompasses our social, societal, environmental and economic responsibility.



INTEGRITY

We act with integrity.

Having integrity means being honest and loyal and delivering on our commitments. Integrity is matching what we do with what we say.

We undertake to comply fully with the laws and regulations that govern our work, in all the countries we operate in. By having integrity, we protect Clariane, its brand, its reputation, and all its stakeholders.

QUALITY OUR SERVICES

We always provide the very best service.

The quality of our services is paramount, because this is what generates people's trust in our Group. Quality is based on continuous improvement and vigilance in fulfilling the needs of those we care for as best we can. It translates as caring about the other person: their well-being and overall happiness, above and beyond practical care and treatment.

Quality and ethics go hand in hand: Together, they can help us to achieve care excellence and to implement our *positive care* approach.

SUSTAINABILITY OF OUR ACTIONS

We conduct our business in a sustainable manner and are mindful of our economic, social, societal and environmental responsibilities.

Ensuring sustainability means making decisions that achieve a fair economic, social, societal and environmental balance now, but more particularly in the future. We do this by adopting a virtuous approach to guarantee the stability and continuity of our business. Our stakeholders depend on us to be solid and reliable.

INTEGRITY



Gifts and influence

We strive to prevent and stamp out all forms of corruption and/or fraud. Corruption impedes economic growth and breaks down trust in companies and people.

Fraud can occur in different forms, such as corruption, influence peddling, fraudulent labelling, theft, money laundering, tax evasion, and falsifying accounting documents. Should Clariane learn of any commissions gained from such practices, disciplinary measures will be taken and a case will be filed with the relevant national authorities if warranted.

✓ I will:

- Strictly abide by Clariane's rules concerning the prevention of corruption, particularly the hospitality and gift policy, by only accepting gifts or invitations of symbolic value.
- Abide by the rules for charity donations and sponsoring.
- Be transparent about any lobbying I do on the Group's
- behalf and ask for permission before doing so.

✗ I will not:

- Accept any cash or gifts of value such as entertainment, accommodation and meals, trips or loans.
- Make facilitation payments (i.e., pay to accelerate a standard procedure performed by the authorities) or pay large sums in cash.
- Use my position at the Group to obtain undue personal gain or use my influence to benefit a third party.

TO LEARN MORE ABOUT THIS: you can read our Group's Gift and Hospitality policy, and the Clariane Code of Conduct - Anti-Corruption Guide.



Gifts and influence

I manage a Clariane care home and the mayor of the town has asked me to sponsor a big community event. He implied that if I did, he would make sure that the planning permission for our new care home was fast-tracked. Can I accept?

We have a zero-tolerance policy when it comes to corruption. No public authority representative can ask for sponsorship in return for speeding up a permit or an administrative decision. This type of request should be politely declined with an explanation about Clariane's policy in this regard. In this type of situation, you should contact your local Compliance department or the Group Compliance department.

I manage a care home and when I arrived at my office this morning, I found a box full of expensive cosmetics on my desk that a pharmacy had sent as a thank you for our orders. I have worked with this pharmacy for more than ten years and they have never sent this type of gift before. Then I remembered that the pharmacist had mentioned that his son is a nurse and is looking for a job. Should I accept the gift?

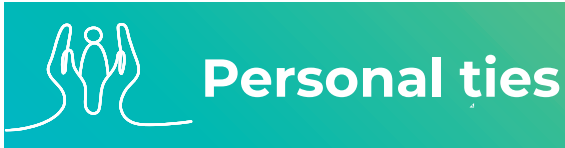
In this case, you should call the pharmacist to thank him, politely explain that you cannot accept his gift and return it to him. That way, if you later receive a CV from his son, you will feel quite at liberty to reject his application and hire somebody who is a better fit, should this be the case.

The director of a company that the Group has worked with regularly for several years offers me a leisure trip with my wife, if I wish, saying that it is to thank me for our good business relationship, which he hopes will continue for a long time to come. Can I accept his offer?

No, you must definitely refuse this type of offer which breaches the Group's anti-corruption policy and the rules about gifts and invitations. You should also inform your line manager and compliance officer so that any measures necessary can be taken regarding this service provider.

The son of a resident who passed away dropped off an envelope with some money in it to thank the team for the care they gave his father. He said that it was also what his father wanted, and it was important to him to respect his father's wishes. He suggested the team use it to go out for a meal together. Should I accept it?

You should refuse any gift or cash donation from residents, patients or their families.



We prevent and deal with any situations where a conflict of interest could or does arise.

A conflict of interest is a situation where the objectivity or neutrality of a Clariane employee or anybody representing the Group could be skewed when making a decision due to personal ties.

✓ I will:

- Declare any personal ties I have with any Clariane suppliers, business partners or competitors if my role at Clariane allows me to influence that relationship in any way.
- Report any direct line of reporting I have with a member of my family or a friend.
- Inform my line manager and my local compliance officer about any real or potential conflict of interest that could influence or appear to influence my judgement or actions.

TO LEARN MORE ABOUT THIS: you can read our Group's Conflict of interests policy.

✗ I will not:

- Get involved in any affairs or matters that could involve Clariane if I have any political or volunteering links outside of work.
- Take part in a selection or recruitment process involving a member of my family or a friend.

I am the manager of a care home. I have received a new resident application that has been backed by a senior manager at Clariane, although our waiting list is very long. Should I prioritise this application by moving it up the list?

In this situation, you have clearly been asked for a favour in the form of offering preferential treatment. Clariane values honesty, courage, equality, trust and responsibility. Going along with this request would compromise these values. You must not comply with the request and simply add the person to the waiting list.



Personal ties

My nephew recently opened a bakery near my care home. His products are reputed for their quality. I eat them myself at home and his prices are similar to those of other local bakeries. I have to choose a new service provider to supply bread to the care home. Must I rule him out on principle?

If the products meet the quality and price criteria, it may be acceptable to use this supplier. However, you must not be involved in the selection process because you clearly have a conflict of interest. In situations where a close relative works or could potentially work as a supplier, for a supplier or for another business partner, you must let your manager know. The management team will then take the necessary steps to avoid putting you in a delicate situation.

I have heard increasingly widespread rumours that a manager on my team has been going out with one of her subordinates for a few months now. What should I do?

While fully respecting our employees' private life, we have a legitimate interest in ensuring harmonious workplace relations, especially when one employee has a level of managerial or functional authority or control over another. For the case in hand, if the situation turns out to be true, there is a conflict of interest which would make it difficult for the manager to remain impartial regarding the person they are in a relationship with. Therefore, this situation needs to be clarified with the parties concerned and Human Resources should be notified so that it can be handled appropriately.





Strategic and sensitive information

We must handle strategic and sensitive information with the utmost vigilance. By protecting this type of information, we protect ourselves.

Just like any employee, we may be in a situation where we have access to or handle strategic company information. Such information must be protected so as not to jeopardise our competitive advantage.

What's more, as the Clariane Group is a listed company, we have to comply with specific rules regarding the use of sensitive information to prevent stock fraud.

✓ I will:

- Keep informed about the Group's rules on managing information.
- Maintain the confidentiality of strategic and sensitive information that I have access to as part of my job and share it only on a need-to-know basis, as required by my general duty of loyalty to Clariane.
- Keep confidential data safe (e.g., data concerning employees, clients or suppliers) in both electronic and hard copy format.
- Treat inside information (specific information about Clariane that has not been made public and which could affect the share price) with total confidentiality.
- Contact the legal or compliance department if I am unsure of the nature of a particular piece of information or how it will be used.

✗ I will not:

- Disclose any confidential or sensitive information on social media, with friends or family, on public transport or in a public place.
- Disclose any inside information about a previous employer.
- Keep any inside information (including copies) if I leave the Group.
- Use inside information for personal or professional gain, for myself or anybody else.

TO LEARN MORE ABOUT THIS: you can read the Group's Confidentiality policy and data protection policy and the Stock market ethic charter.



Strategic and sensitive information

I heard from a colleague that the Group is planning to buy out a fast-growing competitor and that its share prices are likely to go up over the next few weeks. Can I use this information to make a personal investment?

No. Doing so is strictly forbidden and can be sanctioned under laws on insider trading. You are not allowed to use information that has not been publicly disclosed, which you have become privy to as part of your job, to generate gain for yourself or for a third party. We must preserve our integrity. You should explain this to your colleague, who has shown a lack of discretion..

Regarding insider trading, the following information is considered sensitive (this is a non-exhaustive list):

- the financial situation of the Group, a subsidiary, or a facility (turnover, net revenue, occupancy rate, average accommodation price, etc.);
- planned acquisitions or divestments/disposals;
- issuance of an operating permit;
- the loss or gain of a big contract;
- expansion into a new country;
- a list of the Group's public and private partners.

My family often ask me questions about my work. They want to know how the Group is doing financially, what big projects are in the pipeline, and if we are going to be building new facilities, offering new services, or opening up in new countries. I am delighted that they are interested in my work and my company, and I love talking about what I do, but how much can I tell them?

Any information (written, electronic, verbal or in any other form) that is not available to the public and that you have had access to as an employee of the Group should be considered as inside information. You are not allowed to reveal it, even to members of your family or close friends because it could harm Clariane's interests.

Similarly, it is essential to always exercise caution and discretion when discussing confidential matters in a public place (e.g., a train station, airport, restaurant, hotel, public transport or in a car) to avoid accidentally disclosing confidential information.



Free competition and ethical standards

As a responsible company, Clariane strives to comply with rules on free competition and to work with partners who share our ethical standards, in the interest of all our stakeholders.

We pledge to support free and fair competition by offering the best possible solutions to our patients, residents and their families, at the fairest price.

✓ I will:

- Report any action that could violate applicable competition rules, whether it is performed by us or by a stakeholder.
- Put potential suppliers in competition for services valued over a certain amount, to avoid relying too heavily on any one supplier and for the sake of equality.
- Protect sensitive business information.
- Ensure that the supplier selection process is carried out with integrity, equality, impartiality and discretion.
- End any business relationship that breaches our ethical standards.
- Develop business relationships and partnerships with SMEs and other local providers as often as possible.

✗ I will not:

- Directly or indirectly communicate certain information about the Group to competitors, such as:
 - our pricing schedules or methods;
 - the cost of our supplies, services or products;
 - our invoicing, re-invoicing, and promotion conditions;
 - our margins and profits;
 - plans for future extensions.
- Abuse a dominant position or form an agreement on prices or market share with the competition.
- Talk to competitors about subjects that may contravene antitrust and competition law, especially at industry talks, conferences or meetings.

TO LEARN MORE ABOUT THIS: you can read the Sustainable Procurement Charter and our Group's Procurement policy and Third-Party evaluation policy.



Free competition and ethical standards

My care home works with a very efficient maintenance company. The contract requires them to ensure fast callout times, no matter what time you call them. The technicians do a good job, but one of them seems to be a bit put out. I offer him a coffee and have a chat with him. In conversation, he tells me that his callouts aren't paid as overtime, as they should be. What should I do with this information?

Contractors' staff payment conditions and compliance with labour laws are a determining factor for fair competition among them. You should inform the contractor if this is a temporary situation. If this is the contractor's standard practice, then the contract should be put out to tender, and this company banned from bidding. Inform the Group legal department so that they can take any further action required.

The occupancy rate at our care home isn't at its highest, but I know that a competitor has better facilities for a patient that has been referred to me. What should my priority be?

While it is important to consider the financial implications for your care home, the patient's well-being is paramount and takes precedence over a purely economic benefit. Working with other care home providers, even though they are our competitors, can lead us to make mutual referrals to serve the interest of the patient, with nothing in return.

I met a competitor's rep at a seminar who told me that his company was going to increase the price of some of their services. This seems like valuable information. Should I tell someone?

You are not allowed to share or swap any information with competitors regarding our prices, service offering, pricing policies, discounts and promotions, or our sales terms and conditions. If a competitor happens to mention this type of information, you should end the conversation quickly and tactfully, and inform your boss. Even though the information wasn't disclosed deliberately, it could appear to be an unethical illegal agreement, or a rigged proposal. Even though the information wasn't disclosed deliberately, it could appear to be an unethical illegal agreement, or a rigged proposal.

QUALITY OF OUR SERVICES



Professionalism

We are professional in our work and meet our quality standards.

Our quality process is underpinned by rules, naturally, but also a mindset and ethos that reflect wanting to do the right thing, respecting others and being considerate of our colleagues, patients and residents.

The ISO certification process implemented across the Group genuinely contributes to the professionalisation of our jobs.

✓ I will:

- Know and meet the quality standards that apply to my job.
- Do the mandatory training provided by the Group.
- Talk to my colleagues about the best way to follow a procedure in a specific situation if I am unsure.
- Take care of the hygiene and well-being of residents and patients and the cleanliness of the premises.
- Always do my best, whatever the circumstances.
- Adopt the appropriate posture and maintain professional boundaries.

✗ I will not:

- Suddenly decide not to follow a procedure or quality standard.
- Do things just for the sake of it, but rather be fully present in my actions and attitudes.
- Do jobs that I have not been trained for.

TO LEARN MORE ABOUT THIS: you can read the Clariane ISO 9001 standards that apply to your job.



Professionalism

I noticed that one of my colleagues had forgotten to take his jewellery off during his shift, which is a basic hygiene requirement. When I mentioned it to him, he refused to take it off. Should I speak to my line manager?

Yes, because this affects the health and safety of the people in our care and everybody else. It is important to adhere to hygiene rules at all times.

A resident's family has come to me complaining that their mother is badly dressed, saying that she is wearing too many mismatched colours. This lady chooses her outfits herself and wants to wear colourful clothes to brighten up her life. What should I say to her family?

We must remember that our residents are free to make their own choices. In this case, it is important to let them choose what to wear. We can advise them from a health-related standpoint – to make sure they dress appropriately for the weather, for example – but not regarding their personal tastes.

A resident's family points out to me that their father's wardrobe is a mess again and that he can't find his red jumper. They think it is our fault. However, we folded everything up neatly this morning. What do I say to the family?

You should remind them that we always take good care of our residents' belongings. We consider this extremely important for their well-being. It plays a big part in the image of quality we want to convey. However, it can happen that a resident rummages through their clothes and undoes the neatly folded piles. Demonstrating benevolence and patience in this instance tangibly demonstrates the quality of our services.

I am a nurse and have just started working at a Clariane n care home. I've been told that I'll have a buddy with me as I do my rounds. I believe I am a responsible professional and don't need to have someone tagging along to keep an eye on me. Am I right in thinking this?

Clariane is very attentive to the quality of the services we provide. We use a buddy system to help you get off to a good start because we believe it fosters team spirit, peace of mind and professionalism. Your buddy will be able to introduce you to the residents, give you some tips and fill you in on how we work at the home, and ensure that the residents are welcoming and cooperative. Your buddy is there as a facilitator, not a supervisor.

2. Responsibility: our duty



Security

We are always vigilant about security matters. Security is a top priority in the elderly care and support sector.

It is essential for us to safeguard the mental and physical safety of our patients, residents and colleagues. It is also crucial to ensure that our homes, activities and information are safe and secure.

✓ I will:

- Know the security protocols (physical and computerised) for my own benefit and that of others.
- Report any practices that violate the safety and security procedures to my manager.
- If nothing is done, I will escalate the matter to HR or via the INTEGRITY whistle-blowing system.
- Know what to do or who to turn to in an emergency.
- Ensure that all treatment procedures and any incidents can be traced.
- Balance residents' and patients' safety and freedom as best I can.

✗ I will not:

- Treat security matters as an afterthought (e.g., leave a fire door held open to create a breeze in hot weather, block an emergency exit with boxes that are waiting to be put away, leave my computer login or passwords where they can be seen).
- Put off sourcing accurate information or checking the correct way to implement a procedure.
- Shirk my responsibility: everybody is responsible for safety and security.

TO LEARN MORE ABOUT THIS: you can read the Group's crisis management policy.

It's the end of the day and I've already done an extra 15 minutes. I left a resident's tablet (medication) on her bedside table because she didn't want to take it straight away. I said that she could take it herself if needed, but I didn't take the time to write it in the logbook. My colleague on the morning shift saw the tablet when she arrived and asked what had happened.

If I had taken the time to document the conversation I had with the resident, my colleague wouldn't have been surprised to find the tablet on the bedside table. For the well-being of our residents, it is important to write everything down to make sure that information can be traced..



Security

One of the residents we look after left the home this morning without the staff noticing. I'm still in shock thinking about what could have happened to him. What did we overlook?

Zero risk doesn't exist, so you mustn't feel guilty about it. Instead, take the time to discuss it with your team to work out what happened.

Generally, we must always be incredibly vigilant. If a resident does leave the home unnoticed, you should inform the care home manager straight away because this constitutes a serious adverse event. More importantly, you should also inform the police. The person's safety takes precedence. The key is to communicate and inform. Whatever you do, do not hide the incident and report it immediately.

One of my colleagues regularly behaves in an unsuitable manner. He falls asleep easily and often has trouble speaking clearly. I wonder whether he is under the influence of alcohol, drugs, or medicine. What should I do? I know that he has some personal problems at the moment, and I don't want to make things worse for him.

It is important to inform your manager of any type of behaviour that could put anybody in danger, not least your colleague, and jeopardize the safety of the people we look after or other employees. If necessary, your colleague could be referred to HR and put in touch with the counselling services provided for Clariane employees to help him to cope with his problems.

A patient had a medical assessment when she arrived at the home which has revealed that she has depressive tendencies. How can we provide the best care for her and ensure her safety?

The intake assessment is one of the first things that will help us to put in place a heightened level of supervision for people with suicidal and depressive tendencies. Then we will take preventive measures, like putting the patient in a room on the ground floor, for example. We will also take precautions, such as limiting access to sharp objects like razor blades or scissors. Finally, we will alert the whole staff about the specific risk for this patient to ensure that everybody helps to provide increased supervision.

2. Responsibility: our duty



Privacy and personal data

We have a duty to protect the privacy and personal data of our patients, residents and staff.

Our patients, residents and staff place their trust in us by giving us personal and confidential information.

We must honour that trust.

✓ I will:

- Collect, process and use as little personal data as possible, and only ever for a valid professional reason.
- Scrupulously manage access to files that contain personal data.
- Do everything I can to avoid losing or accidentally destroying any information.
- Report any security flaws detected in our information systems or company procedures.
- Tell our patients and colleagues about the type of data that we collect, how we use it, and how they can contact us if they have any questions.

✗ I will not:

- Communicate any information about patients, residents or staff to an unauthorised third party.
- Use professional data for personal purposes or use health data for business purposes.
- Access data that I am not authorised to access, even if I am able to.
- Talk about a patient, resident or colleague by name in the public sphere.

TO LEARN MORE ABOUT THIS: you can read the Clariane IT Charter and the GDPR regulations for your line of work. You can contact your Data Protection Officer (DPO) if you have any questions.



Privacy and personal data

My care home has formed a new partnership with a home-based care provider. Their marketing and sales department would like to offer their services to all our patients and their families. Can we use the emails in the Clariane database to do this?

Before doing anything, you need to check whether the people you want to contact have agreed to receive sales offers from all our partners.

I manage a care home and I've had a call from a patient who wants me to delete her data. I'm trying to convince her that it's not a good idea and that we would like to keep in touch with her. You never know, she might need our help or our services at a later date. Am I right?

The General Data Protection Regulation (GDPR), stipulates that every person has a right to access his or her data, a right to rectify and delete his or her data, but also a right to object, under certain conditions, to use of that data. Requests from clients, job applicants, staff members and leads must be handled in accordance with this clause by following the process applicable, within no more than 30 days. If in doubt, contact your Data Protection Officer.

One of my residents has got a skin rash. I want to show the rash to my colleagues to get their opinion about the best way to treat it. The easiest way to do this would be to send the photo to our WhatsApp group. I don't think this raises any confidentiality or privacy issues because it's only among us. Is it allowed?

No. Personal data must not be sent to social media platforms or to non-secure messaging services like WhatsApp. If you think there might have been a data breach (a breach of the integrity, availability, or confidentiality of the data), you should contact your local Data Protection Officer.

A friend who doesn't work for Clariane has asked me to send him the email addresses of some of my colleagues who are also my friends so that he can contact them for work purposes. Am I allowed to do this?

No. It is important to remember that the right to privacy applies to all Group employees. You must get express permission from the people concerned before giving out personal data.

SUSTAINABILITY OF OUR ACTIONS

Use of Clariane's assets

We take care of Clariane's assets as we would take care of our personal belongings.

Clariane owns various types of assets, both tangible (e.g., computers, medical equipment and medicines, buildings, furniture) and intangible (trademarks, client databases, website, software developed in-house, etc.).

Our shared goals are to ensure that all these things are safe for everybody, and to prevent any type of wastage or stockouts.

✓ I will:

- Protect Clariane's assets from theft, damage and misuse.
- Ask my colleagues for help and advice if I am unsure how to use equipment correctly.
- Read the user guide for equipment used.
- Keep furniture and buildings clean and regularly maintained.
- Explain to colleagues, patients and residents how to use any equipment provided.

✗ I will not:

- Use Clariane work equipment for illicit or abusive purposes.
- Use medical equipment for anything other than the use designated in the protocols without first discussing and debating it with a qualified person.



Use of Clariane's assets

I use the car for work purposes and have to stop off at a garage. I take my handbag with me and leave my laptop on the backseat in plain sight. Is this responsible?

You must look after equipment provided by Clariane in the same way you would look after your personal belongings. Follow the golden rule: "look after other people's belongings as you would like them to look after yours".

I am the chairman of a well-known local sports club. I dedicate a lot of my time to this role, which is good for the company's image because everybody knows what my job is. Occasionally, I want to borrow the care home's company car to get to an event that my sports club is taking part in, at a time when the car is not needed for work purposes, of course. Is it alright to do this?

No, nobody has the right to decide of their own accord to use work time, or any other resource belonging to the Group, for a political, sports or non-profit organisation, for their own personal needs, or to help a family member or a friend. This would require the company to become an official sponsor.





Community cohesion and inclusion

Part of our societal responsibility is to engage with local stakeholders by developing well-balanced, long-term relationships with them.

We encourage our care homes to get involved in the local community and be a part of the care and support network in the regions where our facilities are located.

We aim to foster social relationships in our work that benefit the residents and patients in our care, and everybody in the local community.

✓ I will:

- Open my facility to the wider community, by inviting our partners to the activities we run, for example.
- Encourage partnerships with local organisations in our sector, such as other healthcare or social facilities, charities or clubs.
- Strive to ensure a seamless healthcare journey for local patients and residents.
- Welcome people who have become detached from the job market at our facilities.
- Encourage intergenerational relations and, more widely, a social presence in the community.
- Inform my superiors of my involvement in any political or community organisations that could prevent me from fulfilling my role or blur the lines between my own political and/or trade union involvement and that of Clariane.

✗ I will not:

- Focus solely on what happens inside my care home.
- Think that the patient's care journey outside my facility is not my concern, or consider other healthcare providers purely as competitors.
- Hire staff without giving priority to the local labour market.
- Support a political party on behalf of the Group or give rise to any confusion between my own political opinions and allegiances and those of Clariane.
- Use the Group's financial or material resources to benefit a political party or non-profit organisation (unless I have express permission from a manager).
- Influence or attempt to influence a resident or patient regarding an election.

TO LEARN MORE ABOUT THIS: you can read the documents outlining our CSR strategy available on our corporate websites.



Community cohesion and inclusion

I am a care home manager. The local seniors club in our town has been disbanded. Am I allowed to invite some of the local elderly people to take part in the activities we run at the home?

We welcome any initiative that aims to invite and include people that are part of our ecosystem. You simply need to make sure that it is in line with legal requirements. In this case, for example, you could sign an official agreement with the organization in question.

As a care home manager, can I sign agreements with local partners myself or do I need to go through the area manager or head office?

We strongly encourage anything that can help to promote excellence in the care and well-being of our patients and residents. We believe in growing regional networks to ensure the fluidity of the patient journey and avoid breaking the chain of care.





Protecting the Environment

Environmental responsibility isn't a nice-to-have; it's a non-negotiable that Clariane takes very seriously as a responsible corporate citizen.

We work within the framework of our five CSR commitments and in alignment with the UN Sustainable Development Goals number 12, Responsible Consumption and Production, and 13, Climate Action.

✓ I will:

- Adopter le réflexe « vert » dans tous les actes du quotidien, même les plus petits ou les plus insignifiants.
- Réduire les gaspillages et notre empreinte carbone en optimisant notre consommation énergétique et en privilégiant les produits éco-labellisés ou à usages multiples.
- Être force de propositions auprès de mes collègues (covoiturage, gestion responsable des énergies et des fluides...). Les sensibiliser à notre responsabilité environnementale.
- Réduire les volumes de déchets produits par mon établissement et participer à leur tri et recyclage.
- Favoriser la sobriété digitale en encourageant de meilleures pratiques en matière de stockage de données.

✗ Je m'engage à ne pas :

- Laisser mon ordinateur allumé quand je ne m'en sers pas.
- Laisser le chauffage lorsque les fenêtres sont ouvertes.
- Laisser la lumière allumée lorsque je sors d'une pièce.

TO LEARN MORE ABOUT THIS: you can read the documents outlining our CSR strategy available on our corporate website.



Protecting the Environment

I have noticed that some of my colleagues regularly leave doors or windows open when the air-conditioning is on. The manager has also reminded us about this several times. What should I do?

Close doors and windows when they are left open and remind colleagues yourself that it is important to watch out for this so as not to waste energy. If everybody does this and reminds others of it, it will make a difference.

I am a technical manager at a clinic and I have noticed that my manager, the head of the clinic, often forgets to turn off the light when she leaves her office. Should I say something?

We must all do our part for the environment and contribute to saving natural resources. We can all overlook the little things, like turning off the lights. You should mention it to your manager.

Understandably, we use a lot of single-use products at our facilities, like PPE, disposable medical equipment, and continence pads, which create a huge amount of waste. How can we reconcile the unavoidable use of these items with our endeavours to be more environmentally friendly?

This is an important point that we should all be very aware of. The Clariane Group has already started to replace single-use products by alternatives that can be washed and reused wherever possible, and we will continue to do so. However, there are times when this simply isn't possible, often for hygiene reasons. When single-use products cannot be avoided, it is important for everybody to use the right amount and to use them correctly to limit the quantities used and not produce unnecessary waste.

3. Initiative: our strength

INITIATIVE means acting or making decisions without being asked, in order to meet the needs of our patients or residents, improve the way we carry out our work, or support our colleagues.

Taking initiative may mean doing things differently or going outside of our comfort zone.



INNOVATION

We encourage Innovation.

Innovating means adapting, reviewing, assessing, and looking at our daily routine differently to simplify and improve it.

Innovating can require us to question our practices and procedures to do better.

No innovation or ideas are too small: everyone can suggest better ways of doing things and share their best practices.

SHARED COMMITMENT

We are committed to working together in unison.

This means being fully engaged in our work, understanding its meaning and being proud of what we do.

This Commitment drives us to move forward together, support each other and push our boundaries.

COURAGE

We act with courage.

Being courageous means not being afraid to deal with difficulties or feelings.

We stand by our beliefs and speak out when something is not right.

We acknowledge our limits, weaknesses and failings.

That's what helps us grow and build trust-based relationships within and outside of our company.

INNOVATION



Open-mindedness

We are curious and open-minded.

Being open-minded means being able to question our views and beliefs and being willing to listen to new ideas or those that are different to our own.

“If you want to go fast, go alone; if you want to go far, go together”: we can achieve more by sharing our knowledge.

Being open-minded also means accepting change whenever it is useful or necessary.

✓ I will:

- Keep abreast of changes in my industry and do as much training as I can.
- Try to find new solutions or ways of doing things by regularly reviewing the way I work.
- Ask new recruits to provide feedback on their first impressions.

✗ I will not:

- Think that doing a training course is a sign of lacking skills.
- Always think I'm right.
- Be defensive or aggressive towards someone who questions the way I work or does not agree with me.
- Stick rigidly to the duties listed on my job description.

TO LEARN MORE ABOUT THIS: you can go to the Clariane University portal to read the training catalogue via C-Talent, for those who have it.



Open-mindedness

At the home I work at, the residents are usually washed and dressed by the day shift staff. I do the night shift, and a resident has asked me to wash her now, even though there's an hour to go until the handover. Should I get her to wait?

No, you should change your routine to comply with the resident's request.

I have a newly trained physiotherapist in my department who qualified in another European country. A few days after his induction, he told me that he wasn't taught to do things the way I showed him. He believes that my method is not the best and seems quite sure of himself. How should I react?

Training standards evolve and so do work methods. While you might initially be offended by his attitude, which questions your way of doing things, it's worth listening to your colleague and discussing work methods. You might benefit from some of his ideas while he may benefit from your experience.

I've been asked to swap my shift because we are overstaffed on Sunday and understaffed on Monday. However, this will affect my personal plans. Do I have to accept?

It is quite understandable that you want to stick to your schedule, especially if you have asked to work certain hours. However, everyone is encouraged to accommodate occasional rota changes to ensure that we can meet the care needs of patients and residents with the most stable staffing arrangements possible.



Competencies and talent

We are always expanding our skills and talent and we all contribute suggestions and new ideas.

Our differences produce a wealth of different skills and boost our capacity to innovate.

We believe diversity is a great thing when it comes to recruiting and supporting our employees along their career path.

✓ **I will:**

- Talk to people from different backgrounds.
- Focus on each person's actual skills.
- Keep listening even if I don't understand a colleague's work method or point of view.
- Enable everyone to grow their own skillset.
- Share my ideas and best practices.

✗ **I will not:**

- Only talk to people with a similar background to mine.
- Base my esteem of others on their social or professional status.
- Judge people on their job titles or qualifications.
- Criticize new or different ways of doing things because I am afraid of change.

TO LEARN MORE ABOUT THIS: you can read the Group's Human Resources policy and talk to your Human Resources person to find out about our training and qualification opportunities.



Competencies and talent

The kitchen assistant I've worked with for almost two years has told me that he wants to further his career and become a chef, but he doesn't know how to go about it. Objectively, he is very good at what he does and has all the qualities required, and I know there is a labour shortage for this type of position. However, it won't be easy for me to find a replacement who is reliable and that I get on with. It's neither in my best interest nor the facility's for him to leave. What should I do?

We must recognise our employees' talent and career aspirations and help them to achieve a fulfilling career that they can be proud of.

I'm the lead person for a technical area that I know inside out. A colleague who does not have my experience or qualifications came to me to say that the way I do things isn't the best. Should I accept his opinion?

It is always interesting to talk through things that seem obvious to us. Even if it seems surprising, a new perspective that challenges and requires us to explain ourselves can lead to a change for the better. You should thank this colleague for his input that opens up a wider conversation.



SHARED COMMITMENT



Team spirit

We are a close team and all work towards the same goal.

Our job is all about ensuring the care, safety and well-being of vulnerable people. We are proud to put people first and proud of the role we play in the community, which anchors our business and our motivation.

✓ **I will:**

- Show gratitude for my colleagues' work.
- Always be available for my colleagues and the team when necessary.
- View our profession in a positive light and try to stay in a good frame of mind at work.
- Make time to celebrate the wins and positive outcomes we achieve.

✗ **I will not:**

- Criticize my work environment.
- Say that what we do is useless.
- Give up when things get tough.
- Dwell on my problems.
- Feel smug if I see that a colleague is struggling more than me.



Team spirit

A gentleman I have been looking after for six years has just passed away. I must inform his family. I had grown very close to him, and I'm afraid I won't be able to manage my emotions appropriately. Can I ask someone else to do it?

Yes, of course. We understand these situations which can feel like a failure, although that's not the case at all. Anybody can offer to step in on behalf of a colleague who is upset. It can be discussed with the team, who will together decide the best course of action.

In this type of case, it may be helpful to use the support and counselling services that are provided at your care home or in your department (counsellor/psychologist).

One of my colleagues is always going on about how fed up she is with her job. She has a negative mindset and is forever complaining. It's become a habit and it's really annoying to listen to her gripes. It doesn't seem to be doing her any good either. Should I talk to her?

It is normal that things get to us at times and that we can't just get on with it. But a permanently negative attitude can eat away at the atmosphere within the team. And it's not helpful for the person who is complaining either. You need to have a chat with this person and, if warranted, Human Resources advise her to use the counselling support that HR can arrange for her.

During a meeting, a colleague I work closely with, who has never caused any problems, started showing signs of annoyance and became extremely rude, by interrupting, constantly contradicting me and come across as aggressive. Should I address this behaviour during the meeting?

No, in this type of situation, you should stay calm, let the person express themselves, use active listening and regularly steer the meeting back to the initial agenda. You should talk to him straight after the meeting to try to understand the reasons for his behaviour and give him your feedback.



3. Initiative: our strength



We try to set a good example by always embodying our company's values in the relationships we have both inside and outside the company.

We always take pride in our work. By demonstrating this, we help our organisation to grow.

We demonstrate our values through our words and actions.

✓ I will:

- Embody and reflect the Group's values in my personal behaviour.
- Always bear in mind that nothing is secret or private on the internet.
- If I post anything about my work on social media or the internet, I will think about whether it is appropriate and the effect that anything I publish may have on the Group's image or reputation.
- Make sure I identify myself as a Clariane employee when using social media for professional reasons (such as LinkedIn).
- Show discernment and subtlety if ever I express a critical opinion about the company.
- Inform the Communication Department about any negative comments or controversies about the Clariane Group, its facilities or its employees.

✗ I will not:

- Post anything on social media that could harm my colleagues or the company.
- Post any photos that residents, patients, their families, or my colleagues appear in without their express permission.
- Behave in a way that reflects poorly on the group or my team.
- Speak on behalf of the Group or one of its facilities unless I have been given permission to do so.

TO LEARN MORE ABOUT THIS: please speak to the department that handles your communication.



Ambassador

I often chat with my colleagues in a chat group that has been set up on social media. However, I've started to notice some people making quite serious allegations about our care homes. What should I do?

We advocate free speech and we believe that constructive criticism can help us to grow. However, denigration is not a constructive attitude. Before posting anything on social media (even in a private circle), ask yourself whether you would be prepared to stand by your comments if they were made public. Any text or images that you post to a social media channel can be shared and copied to other media and become public. So, it is important to be cautious and discerning.

All employees are asked to inform the Group's or their country's manager of any content that could damage Clariane 's or its employees' image.

A local journalist who has been invited to visit my care home asked me about the treatment of our residents and our occupancy rate. What should I reply?

Certain information, like the occupancy rate, should not be given to people outside the company. However, you can talk about the capacity of the home, our Quality policy, and our customer commitments. As a rule, any communication made on behalf of the Group or any of its facilities must be approved beforehand by your superiors and the relevant communications department must be informed.

I often read things about Clariane on the internet or social media that I believe to be untrue or even slanderous, and sometimes about the care home I work for. Can I respond to these articles or posts to correct them and speak up for the Group?

While your intentions are admirable, the answer is no. That is not your role. No unauthorised employee is allowed to publish any statements or information about the Group on the internet or anywhere else.

Whenever you see inaccurate information about Clariane on social media, you should inform the communications department, who will take the necessary measures.

COURAGE



We want everybody to express themselves freely.

We say what we think and flag things that need to be improved or potentially problematic situations.

Communicating with courage boosts self-esteem, the quality of our work and team relations, and creates a climate of trust all round.

✓ **I will:**

- Speak up during meetings to give my point of view, even – and especially – if it is different to the one held by other people.
- Openly discuss situations I am concerned about with my colleagues and superiors.
- Keep the well-being of those we care for and the quality of the care we provide at the forefront of my mind.
- Report any adverse events or situations.
- Reassure and support a colleague who wants to report something but doesn't feel able to.

✗ **I will not:**

- Condone taboo subjects or leaving things unsaid.
- Neglect the difference between reporting/ flagging an issue and denouncing somebody.
- Keep quiet when a situation needs to be reported.
- Ignore complaints or negative feedback from residents or their families.
- Accept any habits or routines that do not meet our standard of care.

TO LEARN MORE ABOUT THIS: you can read the Group's procedures for dealing with adverse events and complaints, along with the user guide for our INTEGRITY whistleblowing system and the procedure for collecting and processing reports.

I have noticed that one of my colleagues treats the residents in an inappropriate manner. He is rude to them and talks to them like children. What should I do?

This type of behaviour is not acceptable. You should react straight away by informing your line manager and reporting anything you have witnessed as an adverse event. The wellbeing of the people we care for takes priority over everything else. You will also be protecting your colleague by getting him to think about his behaviour quickly.



Dealing with difficulties

We are not afraid to make decisions and overcome difficult situations with determination.

The relationships we build as part of our care work bring us a great deal of personal fulfilment and satisfaction, but this also makes some things more difficult, such as dealing with the final stages of life. We approach these situations head on and manage them together in a constructive manner. We are engaged in our work yet keep an appropriate professional distance.

✓ I will:

- Be strong when dealing with difficult situations. Not be afraid to make and uphold decisions I feel are fair.
- Be responsive in solving unexpected issues and remain solution-focused.
- Have the courage to recognise my limits and ask for help from my colleagues or superiors if necessary.

✗ I will not:

- Ignore a problem because I fear the consequences of doing something about it.
- Keep quiet about what I am going through to not show signs of 'weakness'.
- Change my mind at the slightest difficulty or simply agree with whatever the last person said.

TO LEARN MORE ABOUT THIS: you can speak to your Human Resources person to find out about the help and counselling services available and our policies for preventing mental health issues.

Due to exceptional weather conditions, several staff members couldn't get into work this morning. I have been asked to do jobs that I've never done before and aren't part of my job description. How should I react?

These are exceptional circumstances that require everyone to pitch in and pull together to ensure that all the patients and residents are cared for, which is the top priority. This situation is, of course, only temporary.

A patient that I have chatted to a lot has got to know me. He increasingly asks for me and it has become difficult for me to handle this relationship. It is causing me stress and starting to affect my well-being at work. Should I talk to my colleagues about it?

It would be best to ask for support so that you can do your job well and feel comfortable. Handing over a difficult patient to someone else isn't a failure. Quite the opposite in fact: it shows that you want to do the right thing. It takes courage to hand over to someone else.

What should I do if I'm still unsure how to proceed after reading this Charter?

Now you have everything you need!

You can have faith in yourself and our company.

There may still be times when you will need to deal with an unexpected or tricky situation and you won't be sure what you should do.

If that happens, you can use the ethics filter when considering your course of action:

- 1.** Is it legal?
- 2.** Does it fit with the company's Ethics Charter and Quality policy?
- 3.** Is it respectful of the person I am caring for?
- 4.** Does it fit well with the commitments we have undertaken concerning them?
- 5.** Is it respectful of other stakeholders – the family, my colleagues, my manager?
- 6.** Would I feel comfortable if it was made public?
- 7.** If I had to argue my case, could I do it easily?
- 8.** Would I be happy with this decision if it was made for me or my family?

If the answer to any of these questions is no, you should talk to your colleagues, boss, Human Resources or Ethics department, or the Group Ethics department alert@clariane.com, depending on how much is at stake.

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