



CODE OF ETHICS

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Chairman's Message

Cegedim complies with the laws and regulations applicable to the economy and conducts all its business honestly and with integrity, in accordance with the highest ethical standards.

Cegedim has therefore made a commitment to comply with the ten principles of the UN Global Compact, the principles of the 1948 Universal Declaration of Human Rights and the International Labor Organization's fundamental conventions.

The fight against international corruption has intensified in recent years. Governments are undertaking sweeping reforms of their legislative systems and some countries, such as the United States and the United Kingdom, have implemented laws that apply extraterritorially. Judicial cooperation is being strengthened and binding preventive standards for companies are being introduced.

At the same time, financial penalties have been increased substantially in cases of anti-competitive practices, corruption, insider trading, fraud, and security breaches mainly involving personal data.

In addition, the anti-corruption approach has shifted toward an obligation to prevent the risk of corruption and the rationale for the relevant measures and policies adopted.

We have updated our Code of Ethics to take all these developments into account.

This new version of the Code of Ethics reaffirms our ethical commitment and factors in new laws and regulations on business conduct. It is also meant to be easier to use and more educational as it now includes concrete examples.

If you have any doubts about an ethics-related question, you should talk about it and seek advice from your superior or your Human Resources manager, or contact the Ethics Committee.

Every one of us needs to make a commitment to ethics to ensure lasting growth and balanced development.

Jean-Claude Labrune
Chairman & CEO

Introduction

In addition to regulatory requirements and legal sanctions, compliance with the law has an ethical dimension. Ethics involves the behavior of all Cegedim Group employees around the world, at all levels of the company, with no exceptions, as well as that of trainees, work-study participants and interns performing their professional duties no matter where they are located (hereinafter the "Employees").

It also applies to all corporate officers and members of the executive and management committees of Cegedim Group and its subsidiaries worldwide.

This Code aims to inform and protect Cegedim's Employees by setting out the Group's standards in these areas and the related codes of conduct.

No document can anticipate or address every situation that may arise. Therefore, whenever you think you are facing this type of decision, ask yourself the following questions:

- Is it consistent with the Code of Ethics?
- Is it legal?
- Is it in line with our values?
- How would my actions affect our stakeholders and can I justify my decision?
- Would I feel comfortable if my decision were made public internally and externally?

If the answer to one of these questions is no or if you have any doubts, you should consult the appropriate people before you act, namely your superior, the legal department or the Ethics Committee.

This Code of Ethics does not replace existing policies and you should continue to refer to all the rules and standards that apply to your workplace. This Code was designed to provide a framework for these policies and standards and to help you better understand the rationale behind them and their purpose.

We are each responsible for adopting this Code and applying its principles.

The Ethics Committee

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The Ethics Committee is composed of five permanent members:

- The Director of Group Communications: Aude Labrune, who chairs the committee;
- The Director of Group Human Resources: Anne-Louise Senne;
- The Chief Financial Officer of the Group: Sandrine Debroise;
- The General Counsel: Christelle Vivet;
- The Director of Financial Communications: Jan Eryk Umiastowski.

You can reach the Ethics Committee at the ethics@cegedim.com email address or contact one of the members individually.

Dissemination of the Code of Ethics

This Code is provided to all new Cegedim employees. Updates to the Code of Ethics are sent electronically to each Employee in French and English and in hard copy to each Activity Director, to the members of Cegedim's Board of Directors and to the Group's senior executives.

These executives promote the values and commitments resulting from this Code among their Employees and monitor their implementation.

Cegedim Group encourages its suppliers to adhere to its values. To that end, they are asked to comply with the principles included in this Code.

Lastly, the Code is made available to the public online in French, Romanian and English on the www.cegedim.fr and www.cegedim.com websites.

Cegedim, a Group with Values

An attention to innovation, quality and investment lies at the heart of the Group's growth strategy and is based on strong values. Respect for these values ensures our future success.

Cegedim's values are based on a continuous drive to innovate and to optimize the quality of its products and data to meet the business needs of its clients' markets.

Cegedim a Group with values

Innovation

Cegedim is dedicated to creating products using the most advanced technologies and to spurring its **talented employees to develop innovative products and services.**

Ethics

Respecting current regulations and acting ethically are integral to the **development** of the company and all of its individuals.

Customer satisfaction

Our company is highly nimble and quick to adapt to changes because of its efficient communication channels and rapid decision-making.

Synergy

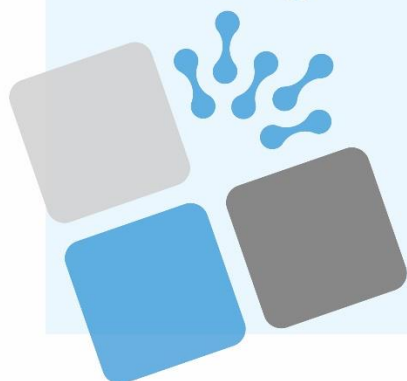
The Group encourages the **share of skills, experiences, knowledge, expertise and resources** between its activities.

Respect

Cegedim employees work in an atmosphere of **mutual respect, equality and recognition, caring** for each other and the environment.

Personal and professional development

Cegedim's management style is based on measuring individual and group performances. **dynamic and personalized career management, an active training policy, and potential for mobility both in France and abroad.**



Let's Talk)))) internal alert system

When in doubt, talk it out!

Employees might have concerns about certain practices and need help or advice to resolve them. We will make sure that any inappropriate behavior within Cegedim, by one of its Employees or even by a third party with which the Group has dealings, is examined in detail and that appropriate measures are taken, no matter who is implicated.

The usual way to raise any such concerns is by notifying your superior. You can also contact your Human Resources manager. In certain countries, you may have access to additional resources, such as employee representatives.

If, under exceptional circumstances, your concern cannot be addressed through the usual channels, you can contact one of the members of the Ethics Committee.

Employees who use the alert system must act in good faith. Good faith means that the alert is reported without malice or consideration of personal benefit and that the Employee has a reasonable basis to believe that the statements and information reported in the alert are true.

Misuse of the system may subject the person making the report to disciplinary action and/or legal proceedings.

Conversely, as long the system is used in good faith, such person will not face any penalties even if the facts are not substantiated after they have been processed and investigated.

Direct or indirect retaliatory measures against an Employee who reported an alert will not be tolerated and will result in disciplinary actions as defined in the bylaws.

If Cegedim's Ethics Committee conducts an investigation, the principles of confidentiality and of the presumption of innocence will be respected.

All parties must cooperate fully with an ethics investigation and provide all information and documents when first requested.

The person implicated will be informed of the nature of the allegations against him or her. He or she may not be informed immediately if, for example, there is a need to verify facts, preserve evidence or refer a matter to the competent authorities.

Any information communicated will be shared only with those individuals who have a legitimate need to know in order to ensure the concern is addressed and/or appropriate measures are taken.

Anyone who raised a concern will be informed of the results of the investigation, to the extent that this is appropriate and that the information can be provided without violating the law or breaching other duties of confidentiality.

Disciplinary action

Employees who fail to comply with this Code could be subject to disciplinary action.

Disciplinary action will be taken in compliance with legal and contractual provisions, and in particular in accordance with the disciplinary procedure set out in Cegedim's bylaws.

In addition, Employees are reminded that acts of corruption and influence peddling are subject to criminal prosecution.

The concept of corruption generally encompasses all acts in which a person (the bribe-taker, or the corrupted) solicits or accepts, on his or her own behalf or for third parties, a gift, a promise or any benefit with the aim of performing, failing to perform or delaying the performance of an action in the exercise of his or her office, duties or responsibilities in order to benefit a third party (the bribe-giver, or the corrupter).

Active corruption is when the person who corrupts instigates the corruption. Passive corruption is when the act of corruption is instigated by the person who is corrupted.

The concept of influence peddling applies when a person abuses his or her real or supposed influence with a view to obtaining an honor, a job, a contract or any other favorable decision from an authority or public administration for a third party in exchange for an advantage.

Influence peddling is also described as active or passive depending on who instigates the act.

A distinction should also be made between influence peddling to direct the action of an official of a public international organization, influence peddling of individuals, influence peddling with a view to obstructing the course of French justice and influence peddling with a view to obstructing the course of international justice.

In France, significant sentences may be imposed on anyone convicted of corruption or influence peddling.

Corruption:

Individuals are punishable by up to 10 years in prison and a maximum fine of €1,000,000. This fine may be increased to twice the proceeds of the offense.

Legal entities are punishable by a maximum fine of €5,000,000. This fine may be increased to twice the proceeds of the offense and additional penalties can be applied, such as exclusion from public procurement.

Influence peddling:

Individuals are punishable by up to five years in prison and a maximum fine of €500,000. This fine may be increased to twice the proceeds of the offense.

Legal entities are punishable by a maximum fine of €2,500,000. This fine may be increased to twice the proceeds of the offense and additional penalties can be applied, such as exclusion from public procurement.

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Meeting
our commitments as a
company

SELECTION AND FAIR TREATMENT OF SUPPLIERS

Cegedim attaches great importance to the fair selection of its suppliers.

Cegedim asks its suppliers to comply with the ethical principles set out in this Code and to ensure that their own suppliers and sub-contractors uphold these principles. Otherwise, Cegedim reserves the right to reevaluate and ultimately to terminate the business relationship in accordance with the law.

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WE SHOULD

- Select suppliers on the basis of open competitive calls for tenders, and ensure that all bids are compared and considered fairly and on the basis of objective criteria.
- Demonstrate transparency in the bidding process. Notify the successful and unsuccessful bidders individually by providing them with a report based on objective factors.
- Maintain balanced business relationships with our suppliers.
- Pay our suppliers on schedule and according to the agreed terms, unless there are legitimate reasons not to do so, such as the failure to deliver the ordered goods or to provide a service.
- Protect our suppliers' confidential information as though it were our own.

WE SHOULD NOT

- Impose abusive terms on suppliers (mainly with respect to payment, deadlines, etc.).
- Continue to work with a supplier that repeatedly fails to meet our expectations or that does not comply with our Ethical Principles, in particular with respect to human rights and/or the fight against corruption.

ETHICAL OR NOT?

I am looking for a new office supply company. The first one that I contacted offers high-quality but expensive products. The second one's products are not as good but they're cheaper (mainly because we were offered a significant discount so the supplier could count Cegedim among its clients). Can I tell the first supplier about the prices offered by the second to try to get a lower price?

You can say, very generally, that another supplier has offered you better prices, but without revealing the prices or the identity of the other supplier. Otherwise, you would be communicating confidential information about a competitor, which would be unethical and, in many countries, unlawful.

I found an excellent supplier; however, it has just started up its business and, for the time being, Cegedim is its only client. Can I use its services?

Yes. There is no reason not to help a company get off the ground. You should nevertheless enter into a temporary contract and inform the supplier that it will have to find other clients by a certain date. If it is proactive, this shouldn't be a problem. If, at the end of the contract, the supplier has not found other clients, you should consider changing suppliers.

Let's Talk)))

Who should I contact? If you have any doubts about supplier selection and treatment, don't keep them to yourself. Talk to your superior, your Purchasing Manager or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
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COMPETITION

Cegedim is concerned about preserving free and undistorted competition, in compliance with current laws and practices, without infringing the rules of competition.

For example, Cegedim prohibits any abuse of dominant position, concerted practice or unlawful agreement through understandings, projects, arrangements or behaviors that have been coordinated among competitors with regard to prices, territories, market shares or customers, among others.

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WE SHOULD

- Preserve free and undistorted competition, in compliance with current laws and practices, without infringing the rules of competition.

WE SHOULD NOT

- Be in contact with our competitors about any confidential matters.
- Establish or accept exclusivity or non-competition clauses (that is, contracts requiring that a company only sell to or buy from Cegedim) before consulting with our legal advisors.
- Agree on prices with our competitors.
- Allocate markets with our competitors.
- Disparage our competitors, including making false statements about their products or services.

ETHICAL OR NOT?

As luck would have it, the top manager at one of our competitors is a long-time friend. Instead of starting a price war, which does not seem very efficient, we were thinking of conferring with each other and agreeing on prices by setting them within the average of market prices to avoid being accused of conspiracy. Is this illegal?

All actions whose purpose or effect is to distort competition are illegal, including the mere exchange of information on prices among competitors.

Let's Talk)))

Who should I contact? If you have any doubts about competition, don't keep them to yourself. Talk to your superior, the Legal Department or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
company

CONFLICTS OF INTEREST

Employees may face situations where their personal interests conflict with those of the company. However, anything that might give the appearance of a conflict of interest can create problems and damage the Group's reputation.

To prevent even potential conflicts of interest, Employees must be alert to any situations in which the objectivity of their business decisions could be impaired. Group Employees likely to find themselves in such a situation are required to report it to their superiors or the Ethics Committee as soon as the conflict arises.

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WE SHOULD

- Inform our superior of any actual or potential conflict of interest that could influence or appear to influence our judgment and actions (for example, if a family member works for a supplier) or if we hold a position, office or financial stake in any organization that is one of Cegecim's competitors, customers, suppliers or business partners if our responsibilities at Cegecim allow us to influence the relationship.
- Comply with the laws and regulations applicable to conflicts of interest.
- Politely but firmly refuse any gift or entertainment that is offered and that could make us feel beholden.
- In certain countries and cultures, refusing a gift from a business partner may be taken as a slight, or even damage our future business relationship with that partner. In that case, you should speak to your superior about how to handle the gift.

WE SHOULD NOT

- Conceal information about any conflict of interest.

ETHICAL OR NOT?

My brother runs a company that prints promotional materials and that has been recognized for the high quality of its services. As the manager responsible for organizing an information campaign about a new product, can I offer him this project, given that his company had the best bid?

You can make the offer. However, you should still tell your superior about your family connection to this potential business partner so that an objective and informed decision can be made, and you should refrain from participating in the decision-making process. You need to inform your superior about any situation where a close relative works for a supplier or another current or potential business partner. He or she can then take steps to avoid putting you in an uncomfortable position.

My wife works for one of Cegedim's competitors. We don't talk about work at home, and I don't see what her job has to do with our Company. But some of my colleagues have suggested that I might be in a delicate position. What should I do?

This could create the appearance of a conflict of interest. To protect yourself and Cegedim, you should discuss this with your superior or your Human Resources Manager. You and your wife should also take steps to ensure that information that is confidential or belongs to either company is protected.

Can a Cegedim Employee also have a personal blog about health informatics?

It would be difficult for a Cegedim Employee to contribute to such a blog because he or she cannot review our products for reasons of fairness and cannot review our competitors' products as this could be interpreted as unfair competition. These blogs are only of value if they reflect customers' actual point of view and we should not invite criticism or leave ourselves open to accusations of influencing the discussion or lacking transparency.

Let's Talk)))

Who should I contact? If you have any doubts about conflicts of interest, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
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GIFTS AND ENTERTAINMENT

Gifts and entertainment can play an important role in developing and maintaining strong business relationships but can also create conflicts between personal interests and professional obligations.

Gifts and hospitality are acceptable, if they are offered openly and transparently, and if local law or customs in the country allow this practice. Their purpose is to convey respect and appreciation. They must not be offered with any expectation of any benefit in return and must not change the nature of the business relationship by making the recipient feel beholden. Their amounts should be reasonable and appropriate to the position, profession and status of the person for whom they are intended. Reasonableness is determined on a country-by-country basis, depending on the laws, culture and economic environment.

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WE SHOULD

- Ensure that the gifts and hospitality that we offer are appropriate and in line with the Ethical Principles set out in this document.
- Politely but firmly refuse any gift or entertainment that is offered and that could make us feel beholden.
- In certain countries and cultures, refusing a gift from a business partner may be taken as a slight, or even damage our future business relationship with that partner. In that case, you should speak to your superior about how to handle the gift.

WE SHOULD NOT

- Accept gifts or hospitality unless they are of reasonable value and appropriate to our position and status. Reasonableness is determined on a country-by-country basis, depending on the laws, culture and economic environment.
- Accept a gift at home.
- Offer gifts or hospitality during a tender procedure.
- Accept or give gifts in the form of cash, cash equivalents, value (capitalization bonds in bearer form, Treasury bills, bearer bonds, money orders, gift cards, gift certificates, etc.), checks or by bank transfer.
- Make the supplier/service provider feel indebted or expect them to do something for us in return.

ETHICAL OR NOT?

Can I offer one of Cegecim's customers tickets to a concert that I cannot attend?

Someone from Cegecim must be present and able to perform his or her professional duties during this outing. The same rule applies when a supplier invites you. The entertainment must be reasonable and customary based on the work that you do and the person extending the invitation must attend in a professional capacity.

In order to sell off obsolete products, a supplier just offered me an exceptional 15% personal discount. Can I accept?

Except in special cases where Cegecim arranges for discounts with certain suppliers, you must let your superior know if a supplier offers you any discounts.

Part of my job is to organize numerous trips, conferences and meetings. The hotel where I often book rooms for Cegecim Employees has offered me an all-expense-paid weekend for my parents' wedding anniversary. This was very nice of them. Can I accept?

No. Even if you do not benefit directly from this type of gift, accepting it will make it more difficult for you to remain impartial when you have to make new reservations for Cegecim. The mere appearance of a conflict of interest is unacceptable; you should politely decline this offer and clearly explain why.

Let's Talk)))

Who should I contact? If you have any doubts about gifts and hospitality, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
company

CORRUPTION AND "FACILITATION PAYMENTS"

Cegedim has a zero-tolerance policy with respect to corruption. Corruption is unacceptable, harmful and damaging to the company.

Corruption is prohibited in all countries in which we operate, particularly when representatives of the public authorities are involved. We have a zero-tolerance policy with respect to corruption, including "facilitation payments," which are payments made to carry out or speed up certain administrative procedures.

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WE SHOULD

- Comply with the laws and conventions on the fight against corruption and bribery and ask service providers to do the same.
- Immediately inform our superiors if we become aware of any actions likely to conflict with our anti-corruption policy.
- Immediately inform our superiors of any extortion or attempted extortion, that is, the payment of a sum of money or anything else of value to avoid immediate bodily harm to a Cegedim Employee or Cegedim representative, and thoroughly document the demand for payment.

WE SHOULD NOT

- Offer, promise or give money, including a facilitation payment or anything else of value (gifts, entertainment, etc.) to a representative of any public authority, to a political party or politician, to a trade union or to a person involved in union activities.
- Offer, promise or give money or anything else of value (gifts, entertainment, etc.) to an Employee or representative of another company that could cause them to breach their duty of loyalty to their company.
- Accept or solicit money or anything else of value (gifts, entertainment, etc.) that could cause us to breach our duty of loyalty to Cegedim or to be perceived as influencing a business relationship.
- Use intermediaries to do anything that we are not allowed to do or that we prohibit ourselves from doing directly. This means that we must carefully select and closely monitor our consultants, sub-contractors, agents and other business partners.

ETHICAL OR NOT?

I was advised to hire a local "consultant" to help me get the necessary permits from certain foreign authorities. This consultant asked me for a large advance and said that he would use the money to "expedite the processes." Since we don't know where the money is really going, should we be concerned?

Yes. If you suspect that an intermediary is acting improperly, do not pay the advance or any other amount before ensuring that no bribe has been paid or is being considered.

I am in negotiations to provide a new customer with our products. A consultant who works for this customer contacted me and told me he could help me by providing me with confidential information about this customer. Can I accept?

You have to refuse this offer and inform your superior. You will likely also have to warn your customer that a third party is trying to sell its confidential information.

I fully understand that Cegedim can't offer gifts to a public official. But can I give a gift, if I buy it with my own money, to an official to thank him for his help in winning a contract with a government agency?

Whether such a gift is given to a public official by you, paid for out of your own pocket, or by Cegedim, it is always a crime. In fact, it is illegal to give such a gift. Doing so could put both Cegedim and yourself at risk. Moreover, due to increased cooperation between states that have ratified international anti-corruption conventions, such as the 1997 OECD convention, acts of corruption committed abroad may also be criminally prosecuted in your home country.

Let's Talk)))

Who should I contact? If you have any doubts about corruption and "facilitation payments," don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
company

CONFIDENTIALITY AND PROTECTION OF SENSITIVE INFORMATION

Any information that is not public must be protected, even where there is no formal obligation of secrecy, whether this information concerns Cegedim, its Employees or third parties.

This information is very valuable to the company and its inadvertent or accidental disclosure may not only affect the Group's competitiveness but also result in malicious acts or unfair competition. We all need to protect internal information by strictly following the Group's rules in this area. Moreover, disseminating this information may violate the confidentiality commitments Cegedim has made to third parties or lead to an insider trading incident. See also the "Privacy and personal data" section on page 24 of this document.

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WE SHOULD

- Limit the disclosure of internal information to only those individuals who have a legitimate need to know in the furtherance of Cegedim's best interests.
- Securely retain all confidential data relating to customers and suppliers, whether this information is in hard copy or electronic form, and carefully review any situation in which it might be disseminated outside Cegedim, even for business relationships that have already been established with third parties.
- Always ensure compliance with the rules on document dissemination, reproduction, retention and destruction.
- Report to our superior or the IT Department any anomalies that might indicate that the protection or confidentiality of sensitive information may have been affected (missing documents, unusual requests for information, indications of possible manipulation of the IT systems, etc.).
- Be discreet when having conversations in public spaces (trains, planes, restaurants, seminars, etc.).
- Follow the specific rules on IT security and on safety by referring in particular to the Guidelines for the Use of Information Systems, also available on the intranet.

WE SHOULD NOT

- Discuss or work on internal information in public spaces where conversations might be overheard and the security of the data might be compromised.
- Directly or indirectly disclose confidential information to individuals outside the Group or to other Cegedim Group Employees whose duties do not require them to have such knowledge.
- Keep any internal information (including any copies) if we leave Cegedim.

ETHICAL OR NOT?

I was walking a potential customer to a meeting and we passed by a colleague's office. His door was wide open, and he was talking to a customer about our pricing policy on speakerphone. He was offering special rates and my customer overheard every word!

Everyone must take the necessary measures to protect the confidentiality of information, even in the workplace, for example by cleaning our desk at night before we leave, locking up our documents, regularly changing our passwords and being careful when we use speakerphones. You never know ahead of time who might be dropping by. Commercially sensitive information should not be shared, even among CegeDIM Employees, without legitimate reason.

A colleague who left CegeDIM told me he just realized he still has internal CegeDIM documents at home. What advice should I give him?

If these are copies, you should ask him to destroy them. If they are originals, they should be sent to a CegeDIM employee who is authorized to receive this information. Talk to your superior to make sure that the right steps are taken.

Let's Talk)))

Who should I contact? If you have any doubts about confidentiality and protection of sensitive information, don't keep them to yourself. Talk to your superior, the Legal Department or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
company

ADVERTISING AND MARKETING

Cegedim provides its customers with clear and honest information about its products and services, and is careful not to make any misleading statements or allegations.

Cegedim is committed to the highest degree of vigilance in its marketing and advertising communications, by promoting responsible behavior.

Cegedim is committed to holding marketing events for opinion leaders and sales forces, such as seminars, receptions, etc., that are appropriate to the position, profession and status of the individuals that they target.

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WE SHOULD

- Adhere to the internal validation processes for communications, promotions and advertising.
- Only use promotional and other information materials that comply with existing internal procedures.
- Design our sales promotions and direct marketing campaigns so that our customers can easily understand the terms of the offer.
- Protect our consumers' personal data. See the "Confidentiality and protection of sensitive information" section on page 18 of this document.
- Refrain from disparaging our competitors, including making false statements about their products or services.

WE SHOULD NOT

- Deliberately overstate any characteristics of our products or services in our communications, including environmental and social characteristics.
- Use information or figures other than those included in the Group's Registration Document unless the data are accurate and verifiable.
- Collect information for behavioral advertising purposes, such as the use of cookies, without first informing Internet users.

ETHICAL OR NOT?

I am working on a new presentation of our products and services for a call for tenders and my manager asked me to significantly round off our key financial and HR figures. I am concerned because I don't think this reflects Cegedim's situation. What should I do?

You should definitely use only the figures provided by the Communications Department. If you have any doubts about the figures you should check with the Communications Department. Cegedim will not, under any circumstances, tolerate the use of incorrect or unjustifiable figures in its communications.

We are getting ready to launch a new offer. I don't have enough room on my flyer to include the very specific terms of the offer. I don't think it matters that much, we need to attract customers!

It does matter and Cegedim does not approve of such practices. You should not mislead the customer by neglecting to specify the particular terms of the promotion. Contact the Communications Department, which will be able to advise you on how to include these terms in your flyer. Please also feel free to check with the Group's Legal Department to make sure you have in fact included all the necessary details in your advertisement.

We are getting ready to launch a new offer and I would like to specify that the service is accessible in just one click. Can we use this catchy term even if it actually takes five or six clicks?

No, you cannot mislead the customer; that would be false advertising. If the service is not actually accessible in just one click you should not use that expression. Contact the Communications Department, which will be able to advise you. Please also feel free to check with the Group's Legal Department to make sure you have in fact included all the necessary details in your advertisement.

Let's Talk)))

Who should I contact? If you have any doubts about advertising and marketing, don't keep them to yourself. Talk to your superior, the Communications Department or the Legal Department, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
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REPRESENTING CEGEDIM

Cegedim is deeply committed to protecting its image and reputation, in particular when it comes to Employees' professional or personal use of social media.

These include blogs, wikis, forums, media-sharing sites (e.g., YouTube, Flickr) and social networks (e.g., Facebook, LinkedIn, Twitter). Cegedim's reputation depends on the way we all behave. Only Employees designated to do so are authorized to communicate, on behalf of the Group, on its activities, products, partners or suppliers, whether the audience is traditional media (press, websites, radio, etc.) or social media.

Comments made about Cegedim, by Employees, including in a private setting, could not only be attributed to the Group but also reflect negatively on its reputation and image. Employees must therefore be responsible and respectful in their use of social media.

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WE SHOULD

- Act with Cegedim's best interests in mind.
- Comply with applicable laws and regulations, in particular those concerning the disclosure of financial information (the company is listed on the stock market and subject to strict disclosure rules) and respect for copyrights, trademarks, privacy, publicity rights, business secret and confidentiality.
- Ensure there is no confusion between our personal opinions or interests and those of the Company.
- Always identify ourselves as Cegedim Employees when we use social media in a professional capacity.
- Always make sure that any draft communication about Cegedim or one of its brands has been adequately prepared and approved by the Communications Department.
- Choose our language and words carefully in all communications.
- Be especially vigilant about taking positions on the Internet; in particular, make sure that the information is not binding on Cegedim, show restraint, respect others and ensure confidentiality and professional secrecy.
- Report any discussion on the web or any negative comments about Cegedim or a Cegedim product to the Communications Department.

WE SHOULD NOT

- Express ourselves in the name or on behalf of Cegedim unless expressly authorized to do so.
- Speak, write or make any commitments in Cegedim's name unless designated to do so.
- Create accounts, pages or blogs on social media in the name or on behalf of Cegedim unless designated to do so.
- Use Cegedim's letterhead, logo or email address for personal matters or to express our personal points of view.
- Reuse visuals, content or photos without authorization and without expressly acknowledging the source.

ETHICAL OR NOT?

Our team attended a conference at a hotel, where we had dinner and spent the night. One team member had a little too much to drink and behaved badly, telling stupid jokes and acting aggressively toward the hotel staff. What should I say to him?

Even though this incident took place in the evening, your colleague was still on assignment for Cegedim. The hotel's other guests still viewed him as a representative of Cegedim. His behavior was clearly unacceptable.

I attended an international conference and during the welcome cocktail hour, I discussed my work at Cegedim with another attendee. Later that night, I realized that the person next to us was a journalist covering the conference. Even though I didn't say anything highly confidential, I would not like to see my comments on the front page.

When you are in public, you should always remember that your words are likely to be quoted whenever you are in a professional or personal situation with a journalist present. Contact the Communications Department, which will be able to advise you.

If sometimes seems like there's a lot of false information about Cegedim on the Internet. Don't I have a duty to correct it?

No. If misinformation is being circulated, inform the Communications Department, which will take the necessary measures. In any event, no unauthorized Employee should publish information or statements in Cegedim's name on the Internet or elsewhere.

Can I post on my personal blog some very funny pictures I took of some of my colleagues at a party organized by Cegedim?

Not only do you need to ask those colleagues for their permission but you should also ask yourself the following question: what image will I be projecting, of myself, my colleagues and my company, if I post these photos online?

Can I repost on the social networks posts published by Cegedim?

Yes. Cegedim's Twitter, Facebook and LinkedIn accounts are managed by the Communications Department and their content complies with the rules (of confidentiality, copyright, etc.) set out above.

Please also refer to Appendix 4: Guidelines for disseminating information to the press and Appendix 5: Guidelines for communicating on social media.

Let's Talk)))

Who should I contact? If you have any doubts about representing Cegedim, don't keep them to yourself. Talk to your superior, the Communications Department or the Legal Department, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
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PRIVACY AND PERSONAL DATA

Cegedim acts transparently to protect personal data and respects the privacy of its business partners and Employees.

Cegedim collects and retains only the data needed to carry out its activities. Cegedim Group has always been particularly vigilant about the security of personal data, which have been its core business for a number of years. Cegedim is an authorized health data host and is ISO 27001 certified for its data centers.

Cegedim Group's target date for compliance with the General Data Protection Regulation (GDPR) is May 25, 2018. For more information on this subject, see Appendix 2 on page 40 of this document.

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WE SHOULD

- Collect only the personal data that is necessary and use minimization processes (pseudonymization or anonymization, as applicable).
- Correct inaccurate or incomplete data and comply with data retention periods.
- Ensure that data are collected in accordance with existing regulations. Don't hesitate to contact the Group's Legal Department.
- Ensure that personal data are stored securely.
- Make sure to transmit this information, within Cegedim, only to authorized individuals who have a legitimate need to know.
- Comply with regulations applicable to international data transfers. Don't hesitate to contact the Group's Legal Department.
- Guarantee our colleagues' right to privacy.
- Ensure that any service providers we may hire to collect or use personal data comply with these principles.
- Collect "sensitive" data only in strict compliance with applicable regulations. If you have any doubts, please contact the legal department.

WE SHOULD NOT

- Communicate personal data to individuals who are not authorized and/or have no need to know.
- Retain this information for a longer period of time than is necessary or required by the contract or existing regulations.
- Access personal data collected by Cegedim for personal reasons; we should only do so for the purposes of the Group.

ETHICAL OR NOT?

I have to transfer some of our business partners' data to an entity in another country. Who should I ask for advice?

It would be best to contact the Legal Department. In fact, the complexity of the issue varies depending on the country, the data in question and the agreement with the customer.

Customer service just received an email from a user who no longer wants to be contacted for marketing campaigns. Do I have to honor his request?

Yes, we have to respect requests from users who do not want us to use their personal data for marketing purposes. We need to make sure that the lists are updated on a regular basis. In certain countries, users can ask to be put on lists if they do not want their personal data to be used. Ask the Legal Department for help on how to best respond to this user's request.

I would like to send one of my colleagues a surprise birthday present to his home. I asked Human Resources for his home address but they said they couldn't give it to me because it would be an "invasion of privacy"! Isn't that a little extreme?

The response from Human Resources was entirely appropriate: Employees' personal data must remain strictly confidential. Human Resources cannot make any exceptions.

Let's Talk)))

Who should I contact? If you have any doubts about privacy and personal data, don't keep them to yourself. Talk to your superior, the Legal Department or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
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USE OF CEGEDIM'S ASSETS

Cegedim's assets are meant to help Employees achieve the Group's business goals. Each Employee is held accountable for Cegedim's resources in order to avoid any losses, misuse, deterioration or waste.

These resources include, among others, equipment, goods, financial resources and any other Group asset.

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WE SHOULD

- Preserve and protect the Group's resources and prevent them from being lost, damaged, misused, wasted, loaned, transferred or sold without authorization.
- Use the Group's resources responsibly and for appropriate, lawful and professional purposes, in order to meet the goals established in the context of its mission, and with the aim of contributing to the development of the Group's activities by refraining from any form of waste or abuse, in particular in the use of any benefits granted.
- Remember that all of the Group's assets and documents belong to Cegedim. They are provided on a temporary basis and remain the property of the Group.

WE SHOULD NOT

- Use Cegedim's resources for private purposes. The personal use of communication tools such as email, telephones, the Internet, etc. is acceptable provided it is infrequent, does not interfere with the employee's work, does not incur additional costs for the company, complies with applicable laws and does not damage Cegedim's reputation.
- Use resources that belong to third parties (photos, films, articles, etc.) without verifying that Cegedim has the right to do so.

ETHICAL OR NOT?

I suspect that one of my team members is doing his own consulting work during office hours and that he's using his Cegedim laptop and email to do so. I mentioned this to one of my friends in the IT department. He can access my colleague's email account and offered to help me look around a little to see what's really going on. Is this acceptable?

No. If you suspect anything, you should talk about your concerns directly with your superior. There are specific procedures covering access to Employees' email accounts, in particular as part of an investigation for disciplinary reasons. Even if your friend in the IT department is able to access your colleague's account, he should not do so unless specifically authorized by Cegedim.

My home printer is broken but my wife needs to send out her résumé for a job immediately. Can I type it up and print it at the office?

You can use your computer for personal documents as long as such use is infrequent and reasonable, does not interfere with your work and is done on your own time.

One of my friends who works in another department regularly emails me a "joke of the day," which is sometimes very funny. I would like to forward some of them to my colleagues to cheer them up on Monday mornings, but I am not sure how my manager would feel about this. What should I do? Should I not include him on the mailing list?

You should not forward these types of messages. Remember, not everyone has the same sense of humor. In particular, Cegedim's email systems and Internet access should never be used to access, retain, send or publish documents that are not consistent with Cegedim's values – specifically those that concern respect for individuals. This obviously concerns pornographic or sexually explicit images, political or religious texts, comments with racist or sexist overtones or anything that could promote violence, hate or intolerance.

I regularly have lunch with a colleague in the Group so we can discuss our strategy. Can I expense these meals?

No, you should not expense them, unless they happen infrequently and if truly the only time you can schedule a work meeting is during lunch. You can expense a lunch for team-building purposes or to thank an Employee for his or her contribution. Don't hesitate to talk about this with your supervisor. Please also refer to the expense policy.

Let's Talk)))

Who should I contact? If you have any doubts about the use of Cegedim's assets, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
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FINANCIAL AND BUSINESS DOCUMENTS AND ANTI-MONEY LAUNDERING

Cegedim accurately reflects its transactions in its financial statements.

Cegedim communicates independently and transparently on its performance. The Group is committed to the simultaneous, effective and full disclosure of relevant, accurate, specific and honest financial and non-financial information, disseminated in a timely manner and consistent with prior publications. Only a limited number of individuals identified within the Group are authorized to disclose information to the financial markets in accordance with the relevant applicable requirements.

Lastly, we need to ensure that our activities are not used to launder proceeds from criminal activity.

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WE SHOULD

- Help ensure that the information included in the financial and business documents, including in financial and non-financial reporting, is always accurate.
- Disclose accurate, specific and honest financial information.
- Inform the public in a timely manner of any event likely to affect Cegedim's share price. However, as some of the decisions that have to be made are complex, only General Management, the Audit Committee, the Director of Communications and the Director of Investor Relations are authorized to make decisions about the information to be published and the date of publication.
- Store these documents securely and comply with the guidelines on archiving and confidentiality.
- Follow the internal verification procedures to ensure that we work with customers whose activities are lawful and whose funds do not come from criminal activity.
- Cooperate with internal and external auditors.
- Maintain comprehensive and accurate books and records that comply with applicable standards and regulations.
- Prohibit all forms of tax fraud.

WE SHOULD NOT

- Sell, transfer or assign any asset belonging to Cegedim without the necessary documents and authorizations.
- Accept cash transactions. Such transactions may be made if there are no other options and provided they do not exceed the authorized legal amount. They must be expressly authorized and be properly recorded and documented.
- Conceal payments through the use of third parties.
- Deliberately help Cegedim evade its tax obligations.

ETHICAL OR NOT?

I was asked to check the sales reports that my manager prepared for the year-end closing. I think I found an error that no one else seems to have noticed. I'm not sure I should point it out because I'm afraid it will damage my relationship with my manager. What should I do?

The reason you were asked to check the sales reports was specifically to make sure there were no mistakes. If you keep this error to yourself, you are not doing your job properly and not serving Cegecim's interests. You should tell your manager what you found. He or she would have no reason to find fault with you; on the contrary, you would be doing the right thing by preventing the reporting of inaccurate information.

My days are sometimes kind of hectic and I am not always able to find receipts for my expenses. Can I claim a few fictitious expenses that are less than the amount requiring a receipt, to get to the right total? There would be nothing dishonest about this because the total wouldn't be higher. I just want to get back what I'm owed.

No. This is unacceptable. This would mean that the expense reports are inaccurate and therefore that the account books are also inaccurate. You are responsible for keeping all your receipts. That is the only way you can be sure you will be reimbursed for your expenses.

One of our customers asked to pay us from different accounts, by both check and cash. Is this acceptable? What should I do?

Be very careful with this type of transaction. This could be a money-laundering technique, a way for proceeds obtained illegally (e.g., drug trafficking, corruption, prostitution, etc.) to be concealed or transformed into seemingly legal transactions. You should take all possible steps to ensure that it is a lawful transaction. These payments may be accepted only under exceptional circumstances and after obtaining the approval of your superior.

I was contacted, in my role as marketing manager, by a business journalist who wanted to interview me so he could write an article about our new products/services. One of these new services will be offered by a company we are in the process of acquiring. Can I give him information about these services?

No. As the acquisition has not yet been made public and this could have an impact on Cegecim's share price, you should postpone the interview at least until after Cegecim's acquisition has been announced. You should also obtain approval from your superior and the Communications Department.

For more information about anti-money laundering as it relates to the insurance activities and the activities carried out by Cegecim SRH, please refer to the guide titled "Anti-money laundering and counter-terrorist financing procedure."

Let's Talk)))

Who should I contact? If you have any doubts about financial and business documents and anti-money laundering, don't keep them to yourself. Talk to your superior, the Communications Department, the Legal Department or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
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INSIDER TRADING

Cegedim has no desire to restrict its Employees' ability to make their own investments. However, we should always keep the rules on insider trading in mind.

Insider trading is when a person with knowledge of material information that has not yet been made public and is likely to influence the value of the shares of a company buys or sells these shares.

The rules on insider trading apply to Cegedim securities and to the securities of third-party companies with which the Group is in negotiations or in a legal dispute and concern all employees without exception.

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WE SHOULD

- Be aware that the use of inside information to make investments could be covered by the laws on insider trading.
- Maintain the confidentiality of all inside information to which we might have access to avoid any inadvertent disclosure.
- Limit the transmission of confidential information to those individuals who have a need to know (be careful with email chains and conversations in public spaces such as trains, planes, restaurants, seminars, etc.).
- Make sure that Cegedim's third-party partners respect the confidentiality of the information entrusted to them, primarily through agreements or clauses concerning respect for confidentiality.
- Check with our superior or with the Financial Communications Department if we have any doubts before trading in any securities.

WE SHOULD NOT

- Buy or sell shares of Cegedim or any other company about which we may have inside information at the time of the transaction.
- Disclose this inside information to anyone inside or outside of Cegedim.

ETHICAL OR NOT?

What exactly does "inside information" mean?

"Inside information" is defined by law. It is information that has not yet been made public and that a reasonable investor is likely to use as part of his or her investment decisions. The inside information could relate to Cegedim Group, its activities, its customers, its suppliers or any company in contact with Cegedim Group. Examples of information that may be considered inside include but are not limited to: financial results; planned acquisitions or disposals; the release of a new product or service; the gain or loss of a major market; and ongoing lawsuits or disputes.

I just learned that Cegedim is about to acquire another company. It looks to me like the right time to buy shares in one or both of these companies, since their value will go up once the news is announced. Can I do that?

No, you cannot. As a Cegedim Employee, you will very likely be considered an "insider"; you must therefore not buy or sell shares of Cegedim or of the other company as long as this transaction has not been made public.

At lunch, I heard some colleagues sitting at the next table talking about a sharp increase in our Company's earnings in the last quarter which was set to be announced publicly two days later. Based on this information, I was thinking that I could buy Cegedim securities before the news was announced and then sell them later at a profit. Can I do that?

No, as explained above, being in possession of this information makes you an insider and therefore prohibits you from trading in Cegedim shares, as long as this information is not public.

I get that I can't buy Cegedim shares myself because I have inside information. But what if I "suggested" to my girlfriend that now might be a good time to buy Cegedim shares. Would that be acceptable?

No, that would be just as unacceptable as if you bought them yourself. Also, even if your girlfriend doesn't take your advice, just passing along a rumor is also unethical and illegal.

Let's Talk)))

Who should I contact? If you have any doubts about insider trading, don't keep them to yourself. Talk to your superior, the Communications Department or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as an
employer

HEALTH, HYGIENE AND SAFETY

Everyone who works for or with Cegedim has the right to a healthy, safe and risk-free work environment.

Workplace safety depends on each and every one of us.

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WE SHOULD

- Comply with Cegedim's rules on health, hygiene and safety.
- Take all reasonable precautions to maintain a safe and healthy work environment.
- Make sure that our actions do not put ourselves or others at risk.
- Make sure we know what to do if there is an emergency in the workplace.
- Immediately report any accident, no matter how minor, as well as any behavior, facility or situation likely to compromise the safety of our work environment to our site's safety officer or to our superior.

WE SHOULD NOT

- Ignore the rules on occupational health, hygiene and safety.

Let's Talk)))

Who should I contact? If you have any doubts about health, hygiene and safety, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as an
employer

RESPECT FOR INDIVIDUALS

Cegedim seeks to promote and maintain a respectful work environment for all Employees and partners.

The Group ensures its innovation, image and competitiveness by developing talent and boosting Employee motivation and performance. Everyone is entitled to respect and human dignity. In particular, all forms of bullying and sexual harassment are unacceptable.

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WE SHOULD

- Ban all forms of discrimination and harassment for reasons related to gender; disability; family status; sexual preference; age; political and philosophical opinions; religious belief; union activity; or ethnic, social, cultural or national origin.
- Treat everyone who works at Cegedim or is applying for a job fairly.
- Promote equal opportunities for all Employees and applicants with respect to hiring, access to training, compensation, social protections, internal mobility and career development. Only skills, experience and individual abilities should be taken into consideration.
- Support and promote Cegedim's commitment to a workplace free of all forms of bullying and sexual harassment.
- Prohibit any behavior that could undermine the dignity of the individual and in particular any act of harassment regardless of its form, any forced or child labour.

WE SHOULD NOT

- Knowingly seek to hurt, offend, or pressure someone into making a mistake.
- Continue any behavior that we have been told is unwanted.

Let's Talk)))

Who should I contact? If you have any doubts about respect for individuals, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
corporate citizen

POLITICAL AND COMMUNITY ACTIVITIES

Cegedim prohibits the payment of money to political or union parties or organizations.

Cegedim respects the right of all Employees to participate, in their personal capacity, in political activities and to play an active role in their communities, as long as it is clear that, in doing so, they do not represent the company.

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WE SHOULD

- Make it clear that we do not represent Cegedim in any way when participating in personal political activities.
- Inform our superior if our participation in political activities could prevent us from fulfilling our duties at Cegedim or create any confusion between our personal political positions and Cegedim's. See the "Conflicts of Interest" section on page 12 of this document.

WE SHOULD NOT

- Use Cegedim's funds or resources (including our work time, phones, paper, email or any other Cegedim asset) to conduct or support personal political activities.
- Bring politics into the workplace.
- Imply that Cegedim supports our personal political activities.
- Pledge our financial support for political parties, politicians or candidates in Cegedim's name.
- Require Employees or business partners to contribute, through gifts or funds, to political or community-based projects.

ETHICAL OR NOT?

I volunteer for a local candidate whose values I think are very closely aligned with Cegedim's. Can I use the copy machine to make a few flyers?

No. Do not use your work time or any other Cegedim resource to support any political activity.

My supervisor suggested that I donate to his daughter's municipal election campaign. Was that appropriate?

No. Even if your manager isn't forcing you to do it, this type of request, however innocent, is not appropriate and could be viewed as putting you under intolerable pressure.

I would like to run for political office at the city level. I plan to say on my posters that I work for Cegedim.

This is not appropriate since it could be taken as Cegedim's endorsement of your candidacy.

Can Employees share their political opinions and commitments in the workplace?

Cegedim respects the right of all Employees to participate in political activities but the workplace is not the right place to talk politics.

Let's Talk)))

Who should I contact? If you have any doubts about political and community activities, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Meeting
our commitments as a
corporate citizen

ENVIRONMENTAL POLICY

Cegedim respects the environment and strives to minimize its ecological impact.

Certain activities required for the provision of our services have a direct impact on the environment. We all have a responsibility to work toward lessening this impact whenever possible. When it comes to the environment, every little bit counts.

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WE SHOULD

- Reduce travel and use alternative solutions that are less polluting, without sacrificing the quality of the service we provide to customers.
- Save energy and water.

WE SHOULD NOT

- Fail to consider the environment in the day-to-day management of our activities.

Let's Talk)))

Who should I contact? If you have any doubts about environmental responsibility, don't keep them to yourself. Talk to your superior or your Human Resources manager, or contact the Ethics Committee; they will provide you with assistance and support (see also the "When in doubt, talk it out!" section).



Appendix

Annexe 1 : Business relationships with suppliers and service providers38

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Annexe 4 : Guidelines for communicating on social media42

Appendix 1

Business relationships with suppliers and service providers

Throughout this document, Supplier refers to suppliers or a service provider, it being understood that sub-contractors and digital services companies (or IT services companies) are included in the supplier category.

Only a limited number of people identified within the Group are authorized to establish and manage business relationships with a Supplier. Contact your supervisor to find out which employee has this authority for your department.

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The employee with this authority must ensure that, before a new business relationship is established with a Supplier, at a minimum the following principles have been applied:

- Verify whether a procurement process is applicable to the proposed purchase. If so, the process must be applied and all its provisions must be implemented.
- Ensure fairness in tendering when bidding is announced, during the bidding process, and when the final selection is made.
- Make sure there are no personal conflicts of interest. Refer to the "Conflicts of Interest" section on page 12 of this document.
- Collect the following information before establishing a new business relationship with suppliers or service providers:
 - **for a sole proprietor:** last name and first name, date and place of birth, place of business, SIREN number or equivalent identification number in a foreign country, financial information; verify the URSSAF (social security) registration and payment;
 - **for a legal entity:** a K-bis extract or equivalent incorporation document for a foreign company containing all information relevant to Cegedim (name, registration number, head office, identity of the senior executive, identity of board members), financial information, share ownership.
- Ensure the confidentiality of the interactions, as well as the traceability and archiving of the entire procurement process. The Employee responsible for the business relationship should maintain a specific folder containing all the information that led to the procurement decision and should email a copy to the Ethics Committee at supplier@cegedim.com.

If, over the course of the business relationship, the Employee notices that the product delivered or service provided does not conform to the purchase agreement or the order, he or she must inform his or her superior so that together they can approach the Supplier to remedy this breach.

Certain factors in Supplier relations call for caution and require an appropriate analysis and potentially the assistance of the Ethics Committee prior to any approval of a new business relationship or its continuation. These factors are defined as **Warning Signs** that might emerge when conducting due diligence prior to establishing a new relationship with a Supplier or at a later date over the course of the relationship. **The existence of a Warning Sign does not in and of itself prevent the establishment of a new business relationship or its continuation.** However, if any of the Warning Signs listed below present themselves, the Employee should contact the Ethics Committee (ethics-supplier@cegedim.com) to decide jointly on an appropriate response.

It goes without saying that you can act immediately if people, goods or the activity are in danger by simply informing the Ethics Committee.

- The Supplier operates out of a country with a high risk of corruption or that is subject to international economic sanctions. For a country evaluation, you can refer to the corruption perceptions index on the website and select the countries in red.
https://www.transparency.org/news/feature/corruption_perceptions_index_2016
- The Supplier has a bad reputation and its integrity is questionable or it has received negative press.
- The Supplier does not wish to disclose full information or has refused to respond to requests for information.
- The Supplier refuses to accept the anti-corruption clause in the contract.
- The Supplier was recommended to an Employee by someone who holds public office.
- The Supplier alludes to the need to make payments in the form of donations or contributions to a political party.
- The Supplier has expressed concerns about the questions asked in connection with its anti-corruption measures or has said it cannot represent or warrant that it has not violated and will not violate the applicable anti-corruption laws and regulations.
- The Supplier requests payments in cash, to a third-party account, or a transfer of an unusual nature (for example, a bank transfer to a bank account or a bank located in a country with no connection to the Supplier).
- The Supplier is assisted by "sub-agents" or sub-contractors who are concealed or do not seem to have the skills or resources required to provide the services offered.
- The transactions are in dollars, outside of the USA.
- The request for the payment of a commission or a fee seems unusually high and disproportionate to the corresponding services.
- When an additional service is requested, the fees or payments requested are unusually high.

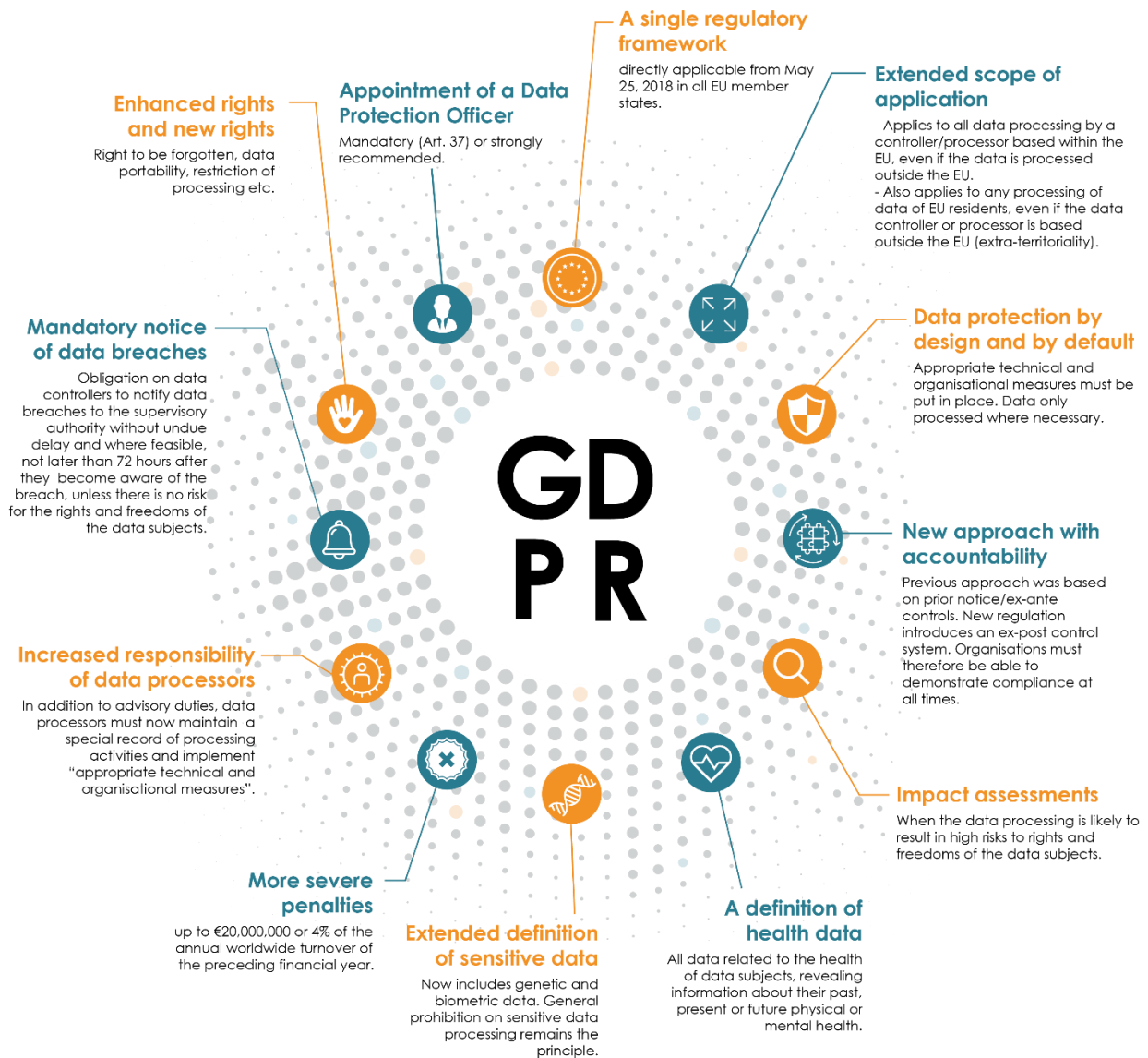
Appendix 2

GDPR

GENERAL DATA PROTECTION REGULATION

TWELVE KEY POINTS

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Appendix 3

Guidelines for disseminating information to the press

Because Cegedim SA is a listed company, Cegedim Group's external communications must be centralized, monitored and consistent with the official information that is included, in particular, in its registration document. Cegedim could be subject to sanctions for inadequate communication.

That is why certain rules must be followed within the Group regarding communication with the media regardless of form (website, print press, TV, radio, etc.), in particular with respect to strategic information (signature of contracts, partnerships, acquisitions, results, etc.).

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If the Group Communications Department does not help you draft and disseminate press releases, **you must follow the process set out below:**



Appendix 4

Guidelines for communicating on social media

Cegedim is deeply committed to protecting its image and reputation, in particular when it comes to Employees' professional or personal use of social media. These include blogs, wikis, forums, media-sharing sites (e.g., YouTube, Flickr) and social networks (e.g., Facebook, LinkedIn, Twitter). Cegedim's reputation depends on the way we all behave.

Only Employees duly designated to do so are authorized to communicate, on behalf of the Group, on its activities, products, partners or suppliers, whether the audience is traditional media (press, websites, radio, etc.) or social media.

Comments made about Cegedim, by Employees, including in a private setting, could not only be attributed to the Group but also reflect negatively on its reputation and image. Employees must therefore be responsible and respectful in their use of social media and take care to protect Cegedim's image and reputation.

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✓ We should

- Act with **Cegedim's best interests** in mind.
- **Comply with applicable laws and regulations, in particular those concerning the disclosure of financial information** (the company is listed on the stock market and subject to strict disclosure rules) and respect for copyrights, trademarks, privacy, publicity rights, business secret and confidentiality.
- **Ensure there is no confusion between our personal opinions or interests and those of the Company.**
- **Always identify ourselves as Cegedim Employees** when we use social media in a professional capacity.
- **Always make sure that any draft communication about Cegedim** or one of its brands has been adequately prepared and approved by the Communications Department.
- **Choose our language and words carefully** in all communications.
- Be especially vigilant about taking positions on the Internet; in particular, make sure that the information is not binding on Cegedim, show restraint, respect others and ensure confidentiality and professional secrecy.
- **Report any discussion on the web or any negative comments** about Cegedim or a Cegedim product to the Communications Department.

✗ We should not

- **Express ourselves in the name or on behalf of Cegedim** unless expressly authorized to do so.
- **Speak, write** or make any commitments **in Cegedim's name** unless designated to do so.
- **Create accounts, pages or blogs** on social media in the name or on behalf of Cegedim unless designated to do so.
- **Use Cegedim's letterhead, logo or email address for personal matters** or to express our personal points of view.
- **Reuse visuals, content or photos** without authorization and without expressly acknowledging the source.

For more information

Consult the Code of Ethics or contact the Head of Communication :

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Limited Company
with share capital of 13,336,506.43 €

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RCS Nanterre: 350 422 622
Code NAF: 6311 Z

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www.cegedim.com

