

Ethical **Business Conduct** Charter

Domus 
Group



Domus 

Domus 

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PFLEGE


TRINITY CARE

MARTHA FLORA
De meest persoonlijke demeritweg

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Our profession is certainly one of the most demanding and noble. It is to preserve the well-being and quality of life of people weakened by age and illness, by maintaining an active social life, and to help societies adapt to the demographic challenge of ageing.

Our business therefore calls for responsible and long-term development. It is based on the gradual building up of a reputation for quality and reliability since our creation nearly forty years ago. It is nourished by values that guide the daily actions of each of the professionals in our teams: the know how to care, the pioneer spirit, the people mindedness, the truth of emotions, the shared trust.

DomusVi has always opted for a multi-local and decentralised organisation. In this way, each employee has at their level, the greatest possible autonomy of action and the ability to make decisions on their own. In this way, we are as close as possible to the needs and expectations of the elderly people we serve. The commitment and sense of responsibility of everyone is therefore an essential element of our business operations.

The DomusVi Group's Ethical Business Conduct Charter therefore takes on its full meaning. It aims to help each employee in the exercise of their responsibilities. It states as clearly as possible what is expected by explaining our fundamental principles and illustrating them with practical examples. It is a guide to interacting with others and behaving daily.

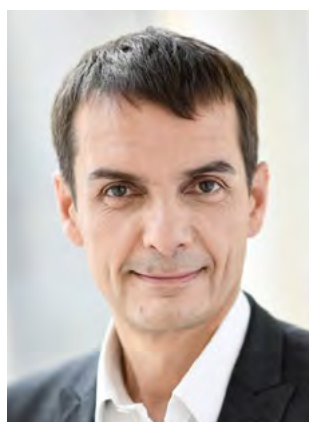
Our mission is people-centred and requires exemplary behaviour. Our demand for professional ethics must be reflected in our business ethics.

Professional ethics committees have therefore been set up. They are intended to answer the ethical questions of our employees in their daily professional practice and are part of our continuous improvement approach to care and services.

This Ethical Business Conduct Charter reminds us that belonging to the DomusVi Group implies compliance with the laws and regulations in force and sets out the ethical principles that must, in all circumstances, inspire our behaviour and our relations with our stakeholders.

I therefore encourage every employee to read, re-read and consult this Ethical Business Conduct Charter regularly and to comply with it in every respect.

Sylvain Rabuel, Chairman of the DomusVi Group





Our mission is to take care of vulnerable people, particularly those made vulnerable by old age. This human-centred mission requires exemplary behaviour, on which the quality of our support and services depends. It is our clients, and this absolute commitment to caring for them, that inspire the values and ethical principles we choose to follow.

Our Ethical Business Conduct Charter sets out our common fundamental ethical principles and the rules and behaviours that result from them. It incorporates our best practices, the day-to-day lessons we learn in the course of our business, and the legislative and regulatory compliance requirements in the territories where we operate.

The primary objective of our Charter is to provide clear guidance and answers to the Group's employees regarding business ethics and corporate social responsibility in their day-to-day activities.

This Charter is part of the Compliance Programme deployed throughout the DomusVi Group. It is a unique document that addresses fundamental and essential issues for the DomusVi Group.

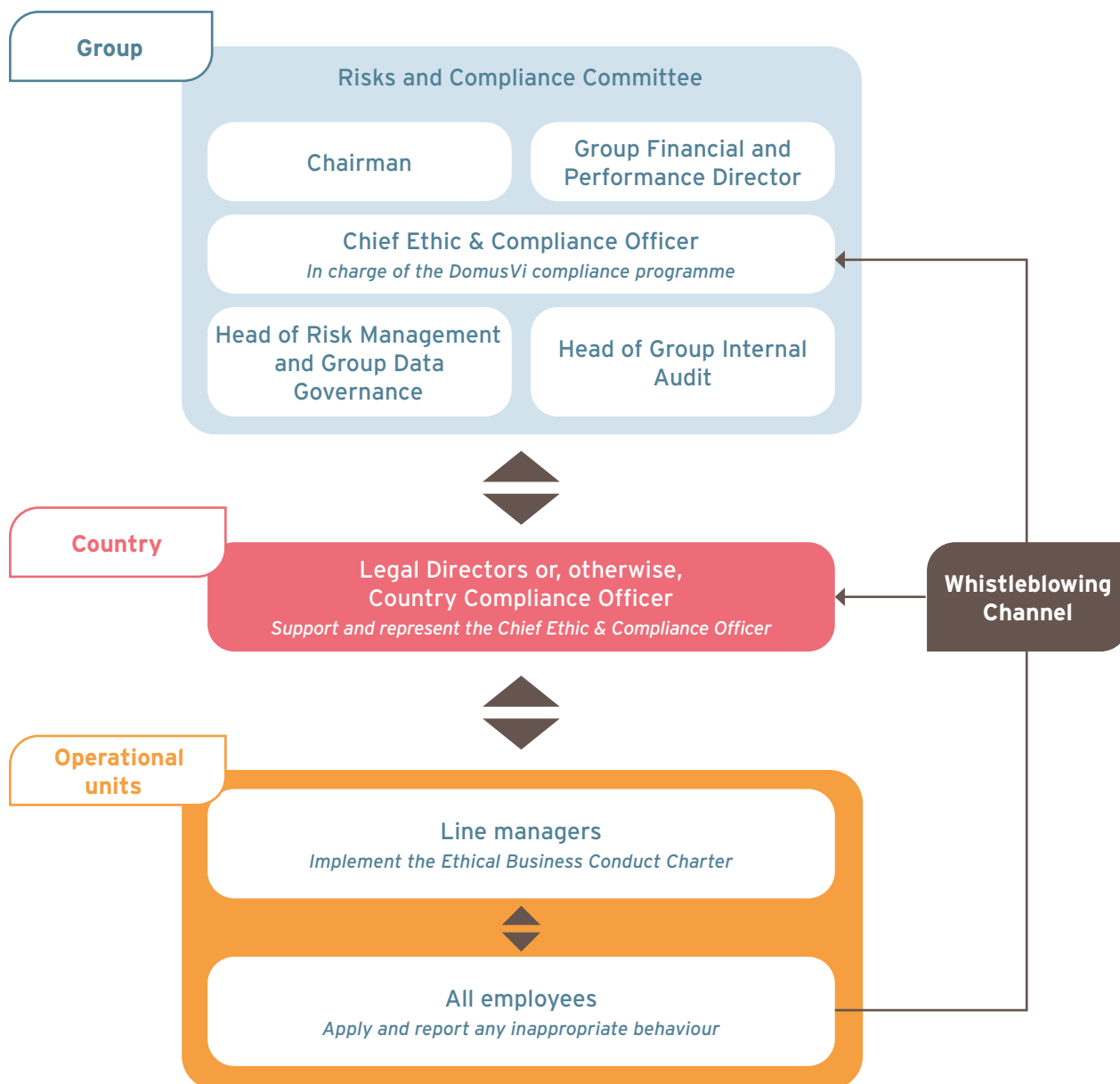
This Charter, these principles and these ethical rules are ours. They are like us because they are inspired by our values, our customers and the quality of our services. We must all implement them, respect them, and preserve them as a fundamental achievement. Any violation of these principles or rules would constitute a serious act that could have harmful consequences for individuals or for the DomusVi Group as a whole and could damage its reputation.



Matthieu Hauw
Chief Ethic & Compliance Officer



The DomusVi Group's compliance organisation.





Ethical Business Conduct Charter : instructions for use.

Why have an Ethical Business Conduct Charter?

Business conduct refers to the way a company conducts its business and interacts with its stakeholders. It seemed important to provide all DomusVi Group employees with an Ethical Charter to guide them in the honest and fair conduct of our activities and the exercise of their daily responsibilities.

What does it contain?

Our Ethical Business Conduct Charter sets out our values and the ethical principles that should guide the DomusVi Group's employees in their decision-making and judgement to adopt appropriate professional behaviour in all circumstances.

These ethical principles are not intended to be a substitute for law, regulations or the policies, procedures, and rules to which each of us must continue to refer in our business. They supplement the rules laid down at the level of the Group's establishments and cannot undermine them.

The following provisions are not intended to present in detail all the legal obligations that may apply, but to draw attention to certain risks that require particular vigilance by all of us.

How to use it?

This Ethical Business Conduct Charter is made up of practical thematic sheets. For each topic, the objective is to understand the ethical issues at stake and to provide guidelines for an appropriate response.

Use this Charter as a guide: our Ethical Business Conduct Charter is also a tool for all of us to resolve questions or find answers to dilemmas. When you think you are facing an ethical issue, you should ask yourself the following questions:

- 1. Is this consistent with what is expected of me in terms of DomusVi's values and business ethics?**
- 2. Does it comply with the law and regulations?**
- 3. What is the impact on our stakeholders (all those involved)?**
How would they react if they were in the same situation?
In particular, is there a risk of physical and/or psychological harm to a staff member or resident?
- 4. Do I still have a doubt?**
If so, seek help from your line manager, your Country Compliance Officer or the Chief Ethic & Compliance Officer as a priority. Each of us may find ourselves in a difficult situation and need help and advice to resolve it. It is a good thing to ask for help at the right time.



How to report a problem: the Whistleblowing Channel.

- On the DomusVi Group website, select the section **THE GROUP / WHISTLEBLOWING ALERT**. You must choose your country of origin, and then follow the instructions.
- On your country's website, click on [the link](#) and follow the instructions.
- On a secondary site (residence, etc.), click on [the link](#) to be redirected to your country website.



Scan this QR Code
to access directly to
the Whistleblowing
Channel

On each site, you can find the instructions in the whistleblowing user guide on each page dedicated to the Whistleblowing Channel. You can also access the guide by clicking on [the link](#) and choosing the document published in your language.

DomusVi encourages dialogue and all employees must be able to express their legitimate concerns, their point of view, defend their opinions and report unacceptable behaviour or requests in complete confidence.

Any concerns expressed in good faith about inappropriate behaviour should be addressed. «In good faith» means that at the time it is expressed, the speaker honestly believed that the information given was accurate, even if it later transpired that this was not or no longer the case. Every effort will be made to provide an appropriate response that respects our values, the law and our commitments.

You can give your identity or choose to remain anonymous. DomusVi guarantees the strict confidentiality of your identity.

The Chief Ethic & Compliance Officer is independent. All communication with the Chief Compliance Officer or your Country Compliance Officer on his behalf is confidential in nature. They are not required to disclose the identity of those who have raised concerns. Information communicated by alerts will be sent to the persons concerned in order to deal with the alert correctly.

Misuse of the whistleblowing mechanism may expose the abusive user to disciplinary sanctions; conversely, use of the system in good faith may in no case expose its user to sanctions. DomusVi is committed to ensuring that no employee suffers a change in status, harassment, or any other form of discrimination as a result of reporting to the Chief Ethic & Compliance Officer or providing information in good faith.

The Ethical Charter commits us!

The principles laid down in this Charter have been validated by the Executive Committee of the DomusVi Group and approved by the Supervisory Board of the parent company of the DomusVi Group. They are binding. No one in the DomusVi Group, whatever his or her hierarchical level, can disregard it.

Any failure by an employee to comply with these rules would constitute misconduct and could be subject to disciplinary action and appropriate prosecution by their employer within the Group, in accordance with applicable law.

Such sanctions could, in particular, in accordance with the applicable law, include dismissal for misconduct.



Our values.

DomusVi was built on deeply humanistic values: its economic success is inseparable from its ambitious human project. Our values guide our actions and behaviour and inspire our management and organisation.



The KNOW HOW TO CARE

Beyond competence, the profession takes on another dimension when our teams combine know-how, expertise and humanitarianism with a single goal: the well-being of our residents and their families.



THE PIONEER SPIRIT

Residents and their families are changing, expecting more than just a minimum service. You have to know how to innovate, to surprise, to offer something in addition to a standard offer.



The PEOPLE MINDEDNESS

To put the Other before oneself, to be always available, to listen, with complete empathy, in a natural way, like a 6th sense: that of a total and authentic humanity.



The TRUTH OF EMOTIONS

As life is organised differently, it is essential to welcome each emotion with simplicity, always in a positive spirit. Because nothing matters more than being true.



The SHARED TRUST

Nothing is possible - when dealing with people - without mutual trust. It must be full, non-negotiable, permanent and reciprocal; the result of an unwavering commitment.



SECTION I

Being a responsible company.

Our responsibility: to act as a company that is integrated in its territories.

Acting as a responsible employer means ensuring a quality working environment.

Respect for people begins with respect for human rights.



Our responsibility: to act as a company that is integrated in its territories.

The DomusVi Group's mission is to preserve the quality of life of vulnerable people, by maintaining an active social life, and to help societies adapt to the demographic challenge of aging. We want to be a multi-local and decentralised company integrated in its territories and concerned about its social and environmental responsibility.



What is Corporate Social Responsibility (CSR)?

CSR is an approach that takes into account the social, environmental and governance issues related to the company's activities. The objective of any CSR approach is to limit the negative impacts on its ecosystem and maximise positive impacts, while preserving its economic viability.

DomusVi is committed to three pillars of responsibility: environmental, social and governance.

DomusVi's CSR approach takes the form of objectives set out in roadmaps that each employee is invited to implement and to which each of them can contribute.

To care for the environment, the Group raises the awareness of each of its employees: it is the daily action of each individual that makes the collective strong.

In support of its CSR approach, the DomusVi Group promotes an open, constructive and transparent dialogue with all its stakeholders.

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Do's

- Minimise the negative environmental impacts of our projects, processes and activities.
- Implement actions that contribute to its preservation: safeguarding natural resources, energy efficiency, waste management and protection of biodiversity.
- Promote, among our employees and stakeholders, all behaviours that are respectful of the environment and of others. Every action counts!
- Respect the commitments of our employees who, as citizens, participate in public life.
- Develop, support or participate in initiatives organised for the benefit of our communities: solidarity projects, intergenerational exchanges, participation in civic life, etc.



Don'ts

- Ignore the social and environmental impacts of our projects, processes, and activities.
- Engage in projects knowingly undermining human rights, human health and safety or the environment.





And in practice, is it ethical?

SITUATION N°1

I am a cook. Every day I notice that the windows are left open while the air conditioning is on. I know it's not good for the planet but it's not my job to manage the temperature and windows in the residence. What do I do?

You are right, this wastes energy resources and has a negative impact on the environment. The use of air conditioning must be controlled to remain reasonable. Even if it does not directly concern your job, we invite you to talk to your colleagues: we are all responsible and every action counts! You can also report the matter to your superiors so that everyone can be reminded of the instructions.

SITUATION N°2

I work in the human resources department in the support services. I notice that the lights in the offices are left on at night, which consumes a lot of electricity. Who should I contact?

Report this to facilities management, which is responsible for managing the premises. If you find that nothing changes, you can also talk to your manager or a CSR ambassador. You are right to be concerned: unnecessary energy consumption wastes resources. Every action counts.

SITUATION N°3

I am witnessing a situation that seems to me to have the potential to jeopardise the safety or health of staff. Who should I contact?

Report this situation to your human resources department, which is responsible for these matters. If you find that nothing changes, you can also talk to your manager and your Country Compliance Officer. You are right to be concerned about this: the safety and health of people are essential concerns for the DomusVi Group.

Acting as a responsible employer means ensuring a quality working environment.

The DomusVi Group respects the conventions of the International Labour Organisation and guarantees each employee the respect of their rights.



What does it mean to be a responsible employer?

It means taking into account the expectations of our employees in order to offer an appropriate organisation and working conditions, it means enabling everyone to achieve professional fulfilment, it means giving meaning to everyone's actions.

DomusVi applies a fair and legally compliant Human Resources policy.

Every employee must be able to work in a suitable, safe, respectful, and caring environment.

Our corporate project includes the ambition to foster the professional development of our employees while respecting fundamental human rights (also see page 17).

We are committed to anticipating the evolution of professions, identifying skill requirements, and developing know-how in the short and medium term. This is why we engage in partnerships with schools and employment stakeholders to develop skills.

We want to promote employment for all, equal opportunities, and gender equality. We are therefore committed to promoting professional integration in a welcoming environment for all. We also create a lot of jobs in each territory where we operate.

Our approach to recruitment and promotion is based on the principles of mutual trust, mutual respect and individual commitment to collective success.



Do's

- Ensure a pleasant and stimulating working environment for all of us.
- Support workers with disabilities so that they also benefit from an adapted working environment.
- Offer all our employees prospects for development that value their skills and their desire to take action.
- Promote an open and active social dialogue with all staff representative bodies.
- Respect the work/life balance of employees.
- Report any situation of harassment to our hierarchy, the Human Resources Department, the harassment contacts, the staff representatives or the Country Compliance Officer.



Don'ts

- Discriminate - even so-called «positive*» discrimination - in any situation whatsoever, i.e. recruitment, training, remuneration and career development.
- Create situations of moral or sexual harassment of our employees.

* positive discrimination is the act of favouring certain groups of people who are victims of systematic discrimination on a temporary basis in order to re-establish equal opportunities (e.g. wanting to hire a person at all costs in order to balance one's team even if other CVs are more promising).





And in practice, is it ethical?

SITUATION N°1

I am IT manager in the support services. I need to recruit for my IT team, which is currently mainly male. In line with the Group's position, I realise that diversity is important. Should I hire a woman first?

No, you cannot discriminate even 'positively' in a recruitment process. You must hire according to the expertise and professional posture you are seeking for the tasks defined in the job description. Furthermore, you may not give any indication of gender in the job offer. Finally, keep in mind that diversity is not only a question of gender, but also of culture, society, disability, etc.

SITUATION N°2

I am a coordinating nurse. A nurse in my nursing home told me she wanted to apply for an internal mobility offer to become a health supervisor. She asks me for training to do this. I hesitate to relay her request because she is very competent and driven: her departure to another home could destabilise the whole team. What do I do?

You cannot refuse to grant her request for such reasons. Our human resources policy is to offer our employees appropriate development opportunities within the Group. We want to train them and support them in their professional development. Do not hesitate to rely on the support functions to organise her departure and replacement and to find the right contacts for your team. Mobility must be anticipated.

SITUATION N°3

I am the director of a nursing home. I received a curriculum vitae from a young woman for the position of maintenance worker. But it is a very physically demanding job. Should I meet her despite my doubts?

If her CV shows the skills and experience required for the job, then yes, you should meet with her and verify that she will indeed be able to perform the tasks required of her. You cannot exclude her from the recruitment process because of gender bias: we recruit without discrimination.



Respect for the dignity of people begins with respect for human rights

Everyone has the right to respect for their person. No situation or status can excuse disrespect for anyone. Psychological or physical violence of any kind has no place within the DomusVi Group.



What are human rights?

Human rights are the universal and fundamental rights that every human being is born with, regardless of ethnicity, nationality, age, gender or religion.

Respect for human rights includes freedom of association, issues of forced labour and the abolition of child labour.

For the DomusVi Group, it is essential that human rights are respected by all.

The following are banned with the utmost severity:

- **Any form of moral or sexual harassment of a person;**
- **Any form of pressure exerted on a person;**
- **Any form of persecution or discrimination, in particular on the grounds of gender, age, disability, origin, sexual orientation, religion, trade union activity or political affiliation.**

Humanity is essential to the achievement of our mission.

Caring for vulnerable people on a daily basis requires that these principles be applied all the more carefully. Respecting the dignity and seeking the consent of the people we care for is an absolute priority.

We must ensure that human rights are respected by our stakeholders in our value chain.



Do's

- Behave in a polite and respectful manner towards our interlocutors, whoever they may be.
- Be tolerant of the particularities, personal choices and preferences of others.
- Listen to and respect the wishes of people in care.
- Report any abusive situation to our hierarchy, the Human Resources Department, the harassment contacts, the staff representatives or the Country Compliance Officer.



Don'ts

- Tolerate abusive behaviour that violates a person's dignity or creates a stressful and hostile environment for them.
- Be abusive in any way.
- Engage in any form of discrimination or harassment.
- Put disproportionate pressure on employees.





And in practice, is it ethical?

SITUATION N°1

I am hospital services employee. I witnessed racist or vexatious comments from a manager towards one of my colleagues. She doesn't want to talk about it, but I find it completely abnormal, and I can see that it is affecting her. What can I do?

This situation must not and cannot continue. You should report the manager's behaviour to your line manager, who will speak with them. No hierarchical position justifies disrespect, and any discriminatory language should be sanctioned. It is up to your hierarchy to establish the precise facts and take appropriate action. Otherwise, you must report the behaviour via the Whistleblowing Channel (see page 7).

SITUATION N°2

I work at the reception of a residence. I am subjected to inappropriate gestures and remarks by my line manager. I am afraid to talk about it because I am on a fixed-term contract, and I don't want to lose my job. Who should I talk to?

Such a report will never lead to dismissal or non-renewal of a contract. If you can, talk to the superior of your line manager. You can also turn to the human resources department, staff representatives, or report the situation via the Whistleblowing Channel.

We condemn all such behaviour and will do our utmost to ensure a safe and respectful working environment for you.

SITUATION N°3

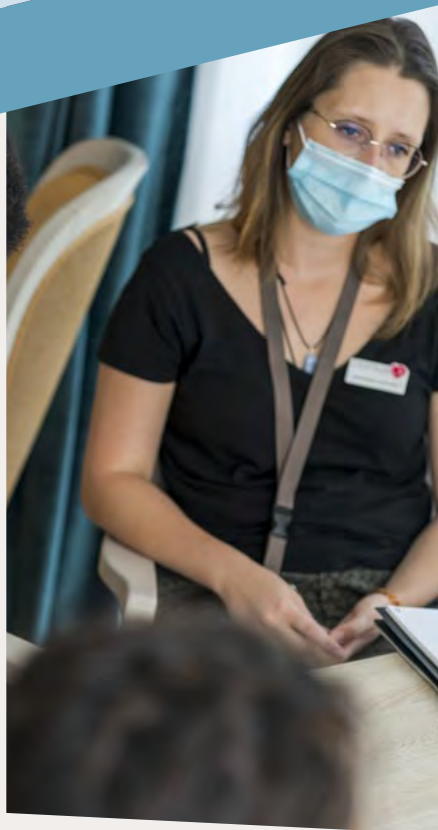
A dependent resident refuses to be accompanied to the toilet but is not able to do it himself. Should I force him?

Before any confrontation, it is important to make every effort to obtain the consent of the person being cared for. You need to analyse the situation as a team, listen and communicate with the resident and their family. Suggestions may become acceptable if the person feels heard. If the situation persists, you can also contact the Professional Ethics Committee.

SITUATION N°4

I am a caregiver. I am witnessing a situation that seems to me to be an act of mistreatment and I can see that it is not voluntary. What should I do?

The right thing to do is to intervene by talking to the person (colleague or family) and offering help or advice. The emphasis should be on listening and dialogue and protecting the resident. If the behaviour continues, you should alert your line manager without delay. Keep in mind that the situation is not necessarily deliberate.



SECTION II

Promoting impeccable business ethics.

Competition law: respect it at all costs!

Ensuring fair trade relations: a guarantee of trust.

Bribery & conflict of interest: zero tolerance!

Preventing conflicts of interest.

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Competition law: respect it at all costs!

When we are in a position to buy a good or a service, we fully appreciate having different offers available to us so that we can compare them. This diversity of offers is possible when each company is committed to respecting competition law.



What is competition law?

Competition law prohibits interference with free competition between players in the same market. This means that every player in this market must have the opportunity to promote its offers freely.

In practical terms, this means that the following anti-competitive conduct is prohibited:

- **Abuse of a dominant position.** It is not allowed to hinder the initiatives of other competitors in order to control the market for one's own profit.
- **Price-fixing.** Whether between competitors or via a network, directly or indirectly, it is not permitted to impose price-fixing in any way.
- **Illicit cartel.** It is also not allowed to form an organisation between competitors, through formal or informal agreements, in order to influence price trends, share markets, etc.

The DomusVi Group is committed to strict compliance with competition law.

It is in the interest of DomusVi, the elderly people it assists and its employees to operate in markets where competition law is respected.

The DomusVi Group therefore asks its employees to respect the regulations related to competition in all situations, especially when they are in a position to make offers on the market.



Do's

- Respect the integrity of the market in both our buying and selling.
- If in doubt when discussing with a competitor, seek advice from the Legal Department in our country.



Don'ts

- Organise a cartel with our competitors and any tender «rigging».
- Take any unlawful action to eliminate a competitor.
- Force business partners to accept unfair business conditions.
- Impose price fixing on our partners.
- Exchange unpublished business data with competitors.





And in practice, is it ethical?

SITUATION N°1

I am the director of a nursing home in a large city. The director of a neighbouring competitor calls me to propose a joint price increase. Can I accept?

No. It is strictly forbidden to make agreements with competitors on such sensitive issues as prices. Such an act would violate competition law and would be reprehensible to the supervisory authorities. In such a situation, you should end the conversation, explain your refusal clearly and explicitly and report the incident immediately to your Country Legal Department.

SITUATION N°2

I am a chef in the kitchen. I have a friend who grows excellent apples. Can I suggest them to my regional catering manager and tell him that I will only cook those apples and no others?

You can suggest to your manager that they list this product, but never impose it. The buyers will examine the product and the offer according to the quality and price criteria applied to all the Group's purchases.

SITUATION N°3

I am a Regional Director and I know my counterpart in a competing group very well. To fill our respective establishments, we divided up the towns and districts to be canvassed and agreed to maintain the bad reputation of the third competitor in the sector. I think I am acting in the interests of the Group; is that right?

Absolutely not. Such a stance could result in the Group being accused of forming an illicit cartel and of denigration of a competitor and be exposed to heavy sanctions. Under no circumstances may you take any action that harms a competitor, nor may you organise a cartel to control the market. Terminate the agreement and explain the reasons to your counterpart: they are certainly bound by similar rules and ethical principles. In addition, you should immediately inform your Country Legal Department.



Ensuring fair trade relations: a guarantee of trust

Every business relationship we have with our partners, suppliers and service providers must be based on objective and fair criteria.



What is a fair-trade relationship?

Establishing a fair and sustainable business relationship means guaranteeing each partner an impartial treatment based on concrete criteria such as quality, cost, transparency, or deadlines.

This fair treatment applies from the outset of the business relationship, regardless of the number of competing partners, suppliers, or business providers.

Business relations are governed by the commercial and competition law. Poor business behaviour can affect the whole company in terms of its image, ethics, reputation and even liability.

As far as business relations are concerned, the DomusVi Group advocates fairness and equity and puts the well-being of its customers first.

Our suppliers and service providers must be selected based on objective and transparent criteria and in the context of prior competitive bidding.

These objective criteria must be explainable and justifiable, and always put the well-being of the elderly and the working conditions of employees first.

The DomusVi Group only uses intermediaries (commercial agents, consultants, business introducers, etc.) when they are able to provide a useful service based on specific professional expertise.

The collaboration with these intermediaries must be compliant with the internal procedures of the DomusVi Group.



Do's

- Select our suppliers and providers after evaluation on the basis of objective criteria (quality, cost, respect for human rights in the value chain, etc.), taking into account their competence and reputation, particularly in terms of business ethics.
- Precisely define the services expected from our suppliers and providers and clearly establish the remuneration owed for these services.
- Ensure the reality and significance of the services provided on both sides. Also ensure that the remuneration is consistent on both sides with the outcome of the service provided.
- Monitor the activities of third parties - particularly when they are acting on our behalf - and ensure that our partners do not compromise the DomusVi Group through unlawful acts.
- Meet the commitments made to our suppliers and providers. And, in particular, ensure payment within the contractual timeframe.



Don'ts

- Use an intermediary to carry out transactions contrary to the law.
- Take advantage of a power imbalance to demand abusive business conditions (prices, deadlines, payment, etc.).
- Maintain an economically dependent relationship with one of our business partners.
- Continue a business relationship with a partner that does not perform to our satisfaction or violates our ethical commitments, including a partner that refuses a clear commitment to fight bribery.
- Engage with a partner whose reputation or past activities create a legitimate suspicion of bribery, questionable or unethical business practices.



And in practice, is it ethical?

SITUATION N°1

I am part of the purchasing department in the support services. A supplier I have never worked with approaches me. I am interested in its products and the prices seem reasonable. Can I enter into a contract with it?

If the volume of purchases and the amounts involved are significant, you should request several quotes from companies offering a similar solution so that you can compare offers. By applying the applicable internal assessment procedures, you will need to ensure that the supplier is aligned with our ethical commitments; respects basic human rights; and respects labour rights in its production chain (textile, food, etc.).

SITUATION N°2

I am a real estate programme manager. For the construction of a new building, I hire an electrical contractor with whom we are used to working. In fact, we make up the majority of its annual turnover. This allows me to negotiate the prices drastically downwards. Is this, okay?

No. We must ensure that we do not create a relationship of economic dependence with our business partners. Furthermore, lowering prices without taking into consideration the economic realities, because we are a major customer, is using an abusive power relationship and could lead your service provider to go bankrupt and incur the liability of the DomusVi Group.

SITUATION N°3

I work in a nursing home. I suspect fraud in connection with a payment to a business partner that may involve an employee. How do I react?

You should report the situation to your line manager without delay, or if this seems complicated, report it to your country financial director or via the Whistle-blowing Channel. Even when in doubt. It is better to be wrong than to let a fraud happen.



Bribery & influence peddling: zero tolerance!

The exercise of our activity must not, under any circumstances, give rise to illicit practices or payments. This is true regardless of the job you do or the position you hold.



What is bribery?

Bribery begins when one agrees to do something - or not to do something - for the sole purpose of receiving a gift or benefit that is not part of the job. A person who solicits or accepts a gift or benefit to perform - or refrain from performing - an act within the scope of his or her duties is in a situation of bribery:

- **Active bribery, on the part of the bribe-giver, consists of giving, suggesting or offering a benefit of any kind to a third party in order to encourage him or her to perform or not to perform an act falling under his or her purview;**
- **Passive bribery, on the part of the bribe-taker, consists of soliciting or accepting a benefit of any kind in order to perform or refrain from performing an act falling under his or her purview.**

It does not matter if the money is actually paid or if the promise is fulfilled. The offence materialises as soon as the bribe-giver proposes and the bribe-taker accepts: this is the pact of bribery.

What is influence peddling?

Influence peddling is the act of soliciting or accepting, without right, at any time, directly or indirectly, a benefit of any kind for oneself or another person in order to abuse or have someone else abuse one's real or supposed influence with a view to obtaining, from a public authority or administration, any distinctions, employment, contracts or any favourable decision.

The crime is constituted by the mere conclusion of the agreement, whether or not it is executed, whether or not the intermediary has influence, whether or not the intended favourable decision is taken.

The DomusVi Group has zero tolerance for bribery and influence peddling.¹

Our sponsorship and patronage activities must comply with the applicable regulations on the fight against and prevention of bribery and influence peddling.



Do's

- Refer to the anti-bribery code of conduct applicable in our countries of operation whenever we have any doubts about a situation we experience or see.
- Immediately inform one's line manager or the Country Compliance Officer via the Whistleblowing Channel when faced with a suspicious situation.
- Evaluate our service providers, subcontractors and partners. If someone puts us in a position of obligation or raises doubts about our integrity, we should avoid them.



Don'ts

- Offer or receive a benefit of any kind (gift, bribe, invitation) in order to perform or refrain from performing an act under one's purview: a business transaction, a decision, a facility or a favour. Promising to offer is already creating a situation of bribery.
- Accept a gift on behalf of a DomusVi Group company, unless the gift is of small or symbolic value.
- Undertake any sponsorship or patronage action that would be in exchange for of any benefit or favour.

1 - Both bribery and influence peddling are subject to criminal prosecution. Employees should refer to the anti-bribery Code of Conduct of the country where they work.



And in practice, is it ethical?

SITUATION N°1

I am caregiver. A family asks me to wash their relative every morning, before any other residents, and offers me a sum of money in exchange. Can I accept?

No. It is not permitted to receive money or any other benefit for services rendered to residents. Every DomusVi employee must take care of the clients without distinction.

SITUATION N°2

I am a nursing home director. I would like to thank a social worker because she recommends our home to people she meets. Can I give her a gift?

In principle, no. However, it is possible to make a one-off gesture of symbolic value. Care should be taken to ensure that the gift is not disproportionate to its purpose. A box of chocolate or a meal at a restaurant once? Yes. A 5-star meal every week? No.



For more information:

- > The anti-bribery Code of Conduct applicable in your country of operation.
- > The gift policy applicable in your country of operation.



Preventing conflicts of interest.

Conflicts of interest, whether potential or actual, endanger the morality, reputation, and proper functioning of the company. It is the responsibility of all employees to prevent any possible interference between their personal interests and the interests of the Group.



What is a conflict of interest?

Conflict of interest refers to any situation of interference between the interests of the company and the personal interests of an employee that is likely to influence the independent, impartial, and objective exercise of his/her job.

The interference may be material (another professional activity or an attachment to another company now or in the past). Personal interests are both those of the employee and those of his/her family.

Even if the conflict of interest is only an assumption or an appearance, it must be declared.

For the DomusVi Group, loyalty is essential.

Each DomusVi employee has a duty of loyalty to the Group.

While respecting the privacy of each individual, the Group expects its employees to undertake to prevent all situations that could lead to a conflict of interest. If in doubt, it is best to come forward.



Do's

- Declare any potential conflict of interest concerning us to our hierarchy, even in case of doubt.
- Immediately alert our hierarchy when we are faced with a risk of conflict of interest. And, as long as a solution has not been found, refrain from engaging in any interference in the relationship between the DomusVi Group and the third party concerned.
- Obtain the approval of the Country Compliance Officer before entering into a transaction on behalf of a DomusVi Group company with a company in which we, or a member of our family, are a significant investor or officer.



Don'ts

- Have an interest in a company - whether it is as a customer, supplier or competitor of the Group - if that investment is likely to influence our behaviour in the performance of our duties within the Group.
- Personally accept an assignment or work offered by a supplier, provider or competitor that is likely to impair our performance or judgement in the performance of our duties in the Group.
- Directly or indirectly engage in any activity or make any statement that would place us in a conflict of interest with the Group.
- Take part in a decision affecting the Group or one of its entities when we contribute - as part of our personal activities - to the decisions of a local authority.



And in practice, is it ethical?

SITUATION N°1

I am an employee in the support services. My brother works for a company that deals in medical devices. Can I suggest working with this company?

You can propose to the Group to list this company. However, you must disclose your relationship and not participate in decisions about this service provider. Furthermore, note that you should only use suppliers listed by the purchasing department and that these suppliers must undergo a pre-contractual evaluation.

SITUATION N°2

I am a nurse, and my mother works for the regional health agency that supervises the nursing home I work in. Do I have to declare it to my hierarchy?

In principle, your mother's position will not affect the performance of your duties. However, as a precautionary measure, you should declare it.

SITUATION N°3

I am a care assistant. I am registered on a candidate electoral list for the municipal elections in my municipality. This is the commune in which I work. Can I put up flyers and posters in my nursing home?

No, political neutrality is important to DomusVi. We respect your political commitment, but it is not possible to associate your nursing home, or any other Group institution, with it in any way.





SECTION III

Acting in an exemplary fashion.

Let's take care of DomusVi's image and equipment together.

To ensure the integrity of our information is to protect our intangible capital!

Respecting the confidentiality of information.

Protecting personal data.

Let's take care of DomusVi's image and assets together.

The assets made available to us by the DomusVi Group - premises, furniture and equipment - enable us to carry out our tasks in good conditions. These assets must be preserved and maintained. The company's know-how, image and reputation are intangible assets that also need to be protected.



Assets: what are goods and intangible capital?

The assets are all that the DomusVi Group makes available to its employees so that they are able to fulfil their tasks.

In physical terms, this includes furniture (desks, appliances, supplies, etc.), buildings and equipment that provide the framework and environment for work.

Intangible capital includes the company's reputation, image and know-how. In concrete terms, this means:

- The working environment and equipment;
- Communication systems and the intranet;
- Procedures, technical or business practices, offers, supplier lists;
- Business secrets, trademarks, domain names, know-how, copyrights and data.

The DomusVi Group is strongly committed to the integrity and preservation of its assets.

Every employee is invited to take care of the assets of the DomusVi Group. They have a duty to protect them and to use them in a strictly professional manner.

The data and information to which each of us has access in the course of our duties are part of the Group's intangible capital, and it is up to each of us to take care of it.

Employees also take care to protect the company's reputation. As a legal entity - and similarly to a natural person - the DomusVi Group is entitled to respect for its reputation and could, if a situation so requires, take action for defamation or denigration.

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Do's

- Take care of the spaces and materials made available to us.
- Report any damage, loss or theft to our hierarchy.
- Carefully read and respect the applicable IT Charter of our country of operation.
- Ensure that our use of the Internet for personal purposes is kept within reasonable limits, justified by the need for a fair balance between private and professional life.
- Check and obtain the necessary authorisations for the use of resources belonging to third parties (photographs, films, articles, logos, brands, etc.).
- Act with the interests, image and reputation of DomusVi in mind and ensure that our views cannot be confused with those of the Group.



Don'ts

- Appropriate any property of DomusVi for our own use, nor make it available to third parties for use for the benefit of parties other than the Group.
- Make illegal copies of software used by the Group or make unauthorised use of such software.
- Use communication systems and intranet networks for illegal purposes, in particular to transmit messages of a racial, sexual or offensive nature.
- Express ourselves and make commitments on behalf of DomusVi without specific authorisation.
- Give out confidential information or information that could harm the Group's image when we express ourselves on social networks.
- Infringe the intellectual property rights of our employees and partners as well as those of third parties.



And in practice, is it ethical?

SITUATION N°1

I am an animator in a nursing home. For an event in my residence, to which I am inviting the families of the residents and the neighbourhood, I would like to create an invitation based on a beautiful photograph found on the internet, to which I have added the DomusVi logo. Can I do it?

Although available on the internet, this does not mean that the photograph will necessarily be free of copyright. Therefore, it is likely that the Group as a whole as well as you personally will be rebuked for its use on a DomusVi document. Before any use, you must make sure that the image can be legally reproduced or ask permission from the author. Do not hesitate to ask the Country Legal Department for advice.

SITUATION N°2

I am a Hospitality Manager in a nursing home. I have a personal dispute with the mayor of my municipality, in which my DomusVi establishment, which provides many jobs, is also located. I write to the mayor using my professional email address so that my complaint carries more weight.

This is forbidden. You may not use the Group's e-mail addresses and letterheads for your personal business.

SITUATION N°3

I am a chef in the kitchen of a residence. I wish to respond to a vindictive review of the establishment where I work that I found on the internet. Can I do it?

No, you cannot respond to this criticism by referring - directly or indirectly - to the fact that you work for this institution. Report the criticism to your line manager, who will take action. You may not speak on behalf of DomusVi without express permission.

SITUATION N°4

I work at the registered office. My son needs a CV for an interview and our family printer is broken. Can I use the one in the office?

Yes, but not systematically. Limited use of the equipment for personal purposes is permitted. It must be reasonable and necessary.

To ensure the integrity of our information is to protect our intangible capital!

Our information is our intangible capital. Ensuring its integrity means preserving its durability and meaning and providing the means for reliable communication, a guarantee of trust and efficiency



What is information integrity?

The quality and reliability of the documents and information produced by the DomusVi Group's employees and which can be provided to our stakeholders (public supervisory authorities, etc.) are part of our intangible capital. Their integrity, i.e. their reliability and intangibility, is fundamental. It is also necessary not to distort them or make them meaningless.

The DomusVi Group is strongly committed to the integrity of its information.

The operations and transactions carried out by the Group are recorded fairly and accurately in the accounts of each company, in accordance with the regulations in force and internal procedures.

All records must be supported by appropriate evidence in good faith. Accounts should never be used to conceal bribes, influence peddling or other improper transactions.

All documents must be kept in accordance with the applicable laws and DomusVi Group policies.

Internal checks have been set up to ensure the quality and reliability of the financial and accounting information and to ensure that the Company's books and records are not used to conceal improper transactions.

Each employee is responsible for the information and documents they produce. Each line manager is responsible for internal checks in accordance with the procedures of the DomusVi Group.



Do's

- Be accurate and honest when making accounting records. And ensure the existence of the documentation corresponding to each entry (contract, estimate, invoice, etc.).
- Be particularly vigilant when transferring funds as to the identity of the recipient and the reason for the transfer.
- Contribute carefully and diligently to internal investigations, reviews and audits, or external audits conducted by our supervisory authorities.
- Ensure the application of all regulations and decisions issued by public authorities applicable to the collection and processing of our information.



Don'ts

- Hinder the proper execution of checks and audits, whether by internal departments, auditors or supervisory authorities.
- Withhold information in the context of checks and audits. This would constitute serious breaches of these rules.
- Damage or destroy our information or data carriers.





And in practice, is it ethical?

SITUATION N°1

I work in the secretariat of a nursing home. One morning, one of the authorities to which my institution belongs is present and wants to review the internal documents and processes. Some of the documents relating to employees' diplomas do not seem to me to be entirely in order. Can I hide them?

No. Even if you think that a document might be harmful to the institution, you are completely prohibited from concealing or destroying documents that are requested from you. We ask you to cooperate fully in this audit, and to engage in a constructive dialogue. We need to make sure that these documents are in order.



SITUATION N°2

I am a regional director. I am informed by one of the authorities responsible for the homes in my sector of a protocol to be implemented. I do not agree with these directives, and so I do not relay them to my staff. Do I have the right to do so?

No. We must relay and ensure the application of decisions issued by public authorities. You can enter into discussions with these supervisory authority - in agreement with the operations management - but you still have to implement the mandatory regulations.

SITUATION N°3

I am an accountant. An invoice that I record seems disproportionate to the service provided. What do I do?

You should contact the establishment concerned by the invoice to check that the amount to be paid corresponds to the estimate in question and the service provided. You should also ensure that the validation process for the specified amounts has been followed. You should not proceed with the payment until these checks have been completed. If there are any inconsistencies, inform your line manager and contact the supplier for an explanation.



Respecting the confidentiality of information.

We have access to a lot of information in the course of our work, every day. It is essential to respect the confidentiality of such information, regardless of its origin.



What is confidential information?

Confidential information means any technical, medical, financial, business and other information, or information referred to as confidential, delivered on any medium and in any form - oral or written, electronic, telephone or telecommunication.

Confidential information should not be disclosed.

The DomusVi Group ascribes great importance to the confidentiality of information.

The principle of confidentiality must be applied to all information. Each employee is responsible for this confidentiality.

For the Group, the following information in particular must be considered strictly confidential:

- To the elderly people accompanied by DomusVi and their families;
- To the employees and human resources of DomusVi;
- The commercial (occupancy rates, prices, promotions, communication, etc.), digital and technological activities of the Group;
- Results, forecasts and all financial and accounting data;
- Acquisitions, disposals, real estate assets and relations with owners and tenants;
- Information concerning the quality, care, new products and services of the Group or its know-how;
- Relations with pricing and regulatory authorities and public authorities.



Do's

- Ensure, with the utmost rigour, the quality and accuracy of the information we transmit within the Group.
- Report any abnormal situation compromising the confidentiality of sensitive information (theft of IT tools, disappearance of documents, hacking, etc.)
- Comply with procedures to ensure the security of information and information systems, particularly by compliance with the internal IT charter. Act with DomusVi's interests, image and reputation in mind.



Don'ts

- Disclose to anyone outside the Group any confidential information that we hold by virtue of our position or, incidentally, by virtue of our membership of the Group.
- Communicate confidential information to Group employees who are not authorised to receive it





And in practice, is it ethical?

SITUATION N°1

I work at the reception of a residence. The IT department asks us to create complex passwords and to change them regularly. To make it easier to remember them, I write them down in my notebook. There is no information that I consider truly confidential in my files. Is this a problem?

Yes. Writing down your password and leaving it easily accessible (a notebook is not very secure) is a real flaw in the security system. This is not allowed. Even if you do not consider your information confidential, a third party could take advantage of it. And access other things, beyond your files, from your login ID or by pretending to be you.

SITUATION N°2

I work in a support department. I was asked to answer an interview on the short-term missions of the DomusVi Group for the Group's internal magazine. Am I allowed to communicate? And how do I know that the reliability of my answers will be respected?

If your manager agrees, you can communicate about your activities in the context of internal content. Check with them what information you can share and do not disclose confidential information. Ask to read your article again before it is published.





Protecting personal data.

Our activity leads us to process data of a personal or even sensitive and medical nature. We must do so in strict compliance with the regulations in force in order to guarantee that all our stakeholders, whether customers, relatives, employees or partners, will have their personal data respected.



What are personal and sensitive data?

Data is said to be «personal» when they relate to a natural person who is directly identified (an e-mail address, a first name) or indirectly identifiable (telephone number, identification code, social security number, etc.).

Personal data are considered sensitive if they reveal «racial» or ethnic origin, political, religious or philosophical opinions, trade union membership, sexual orientation, genetic or biometric information or data concerning the health of the data subject.

The DomusVi Group guarantees the protection of the privacy and personal data of all its stakeholders.

We therefore strictly apply the legislation in force concerning the processing of personal data so that everyone can access, rectify, delete, limit or object to the use of their data.

We also undertake to clearly define and comply with the purposes for which the data are used. Contact your Data Protection Officer (DPO) to find out more about the DomusVi Group's policy on the protection of personal data.



Do's

- Comply with internal procedures for the protection of personal data.
- Inform individuals from whom we collect data of the type of information collected, the purpose of the collection and how to contact them if they have any questions.
- Limit access to data to those who need to use them, specify the frameworks for use and the time limits.
- Implement adequate measures to ensure the security and confidentiality of personal and sensitive data.
- Refer to the country Data Protection Officer (DPO) for each new processing operation (Privacy by design).



Don'ts

- Collect sensitive information without a clearly defined purpose or the consent of the data subjects.
- Disclose to anyone outside the Group any confidential information that we hold by virtue of our position or, incidentally, by virtue of our membership of the Group.
- Communicate personal information outside the Group's entities.
- Communicate personal information outside the Group's entities (unless legally required or in case of formalised subcontracting) without informing the data subjects.
- Communicate confidential information to Group employees who are not authorised to receive it.
- Retain personal data beyond the legal time limits.



And in practice, is it ethical?

SITUATION N°1

I am an executive assistant. A member of staff asks me for the contact details of families who have a relative in our establishment in order to give them a discount offer for the garage her husband runs. Can I pass them on to him?

No. You have access to these data for a specific purpose for which the families have given their consent: monitoring their relative's stay in your establishment. You may only use these data in the context of your duties and may not under any circumstances pass them on to an employee who does not need them in the course of his or her duties.



SITUATION N°2

I am part of the human resources department. The members of the Works Council of a nursing home write to me to get the address of one of their colleagues. They want to throw him a surprise retirement party. I refuse because it would be an invasion of his privacy. Am I right?

Definitely. Even if the intention is benevolent, your response is appropriate: personal data are confidential, and you have access to them for very specific purposes. You cannot use them for any other purpose. Since this is a good idea, suggest to those employees to organise their party in a restaurant or in the residence if the management agrees.

SITUATION N°3

I run a service residence. I can no longer find my USB stick which contained personal data about the residents and prospects of my establishment. It bothers me but I don't really see what can be done with this information if someone gets hold of it. What do I do?

Whether the USB stick is lost or stolen, it is a breach in the security system of personal data used by the company. You should report the incident to your Data Protection Officer (DPO) and specify the type of information lost. He/she will decide on what action to take (declaration, etc.). Furthermore, this information should never have been on a USB stick: it is important to comply with the computer security procedures given to you and not to copy company data onto an unsecured USB stick or external disk.



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MARTHA FLORA
De meest persoonlijke demertheiding