



Code of Ethics

HR_POL_01_V02



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Pierre Pigeon
President

President's message

APLUSA is a service company that operates around the world, through its employees and partners, to provide its clients with vital information for their marketing and strategic operations.

We are respected around the world, not only for our work, but above all because we are trustworthy. Our ambition is to build a strong company centred on shared values.

We are proud to have obtained ISO 20252 certification, which embodies more than 30 years of passionate commitment to support our clients, healthcare industries and institutions, and through them, to serve healthcare professionals and patients worldwide.

Integrity and Respect are two of the core values embedded in our culture. They are essential elements of our activities and are illustrated throughout our Code of Ethics. Ethical conduct is essential inside and outside the company. Each APLUSA employee, wherever they are in the world and whatever position they hold, must embody these values and apply them to serving all our clients and partners. Each partner appointed by APLUSA must also undertake to act in compliance with these rules of conduct.

This Code of Ethics is our framework. I know that I can count on each one of you to respect it and ensure it is respected, to share and transmit the ethics of our company, and thus guarantee our development and reputation.



Our purpose

Our mission is to contribute to better patient care and to improve the well-being of individuals.

Our job is to help healthcare manufacturers and practitioners make the best decisions by supporting them with reliable data and information.

To this end, we collect health data around the world and process them using our technologies and talents, to give our clients strategic and operational advice in order to improve the relevance of their choices.

Taking responsibility for our ecosystems and social systems, we carry out this mission by offering our employees the opportunity to flourish in useful and rewarding work.

Our values

Our DNA: professional elegance

In our attitude and in the simplicity and consistency of our choices and solutions

- **To strive for excellence:** through our integrity, rigour and flexibility, we are committed to providing the best service to our clients. This ethic guides our choices and our behaviour.
- **To cultivate diversity and explore:** celebrating the richness of our diverse backgrounds, cultures and origins, we are committed to constantly exploring, improving our know-how and innovating, in order to meet new health challenges.
- **To grow and flourish:** we are committed to and take pride in our work, which we perform with passion and generosity. In accomplishing their missions, everyone can develop their talents, share and transmit in order to flourish.
- **To be ambitious together:** We are ambitious in our projects. We carry them out together much better than the most talented of us could alone. We are guided by respect and responsibility.





Introduction to our code

Our Code of Ethics is the foundation of our culture. The provisions of the code reflect our values and express APLUSA's commitment to respect professional practices in accordance with all the laws and regulations, conventions or internal standards that govern our activities and all our employees. The code is a key element of APLUSA's governance. However, it does not cover and does not claim to cover all possible situations. It provides guidance and sets out principles that should inspire our internal practices and guide the way we interact with our partners, whoever they may be.

The principles of respect, fairness and honesty must govern everyone's conduct. It is the responsibility of each individual employee to examine each situation with which they are confronted in light of these principles. Each employee must take the time to reflect, exercise common sense and good judgement in order to ensure that they act in accordance with this code.

We urge you to read it carefully. It is important to take the time to understand it, to determine how it should be applied in your professional life and to ask for any necessary clarifications.

If this code proves to be incomplete or imprecise in dealing with certain situations, if you or one of your employees have any doubts about how to act in a particular situation, please check with your superiors and/or the legal department or human resources department.

By doing so, you will be contributing to our culture of excellence and success.

Application of our code

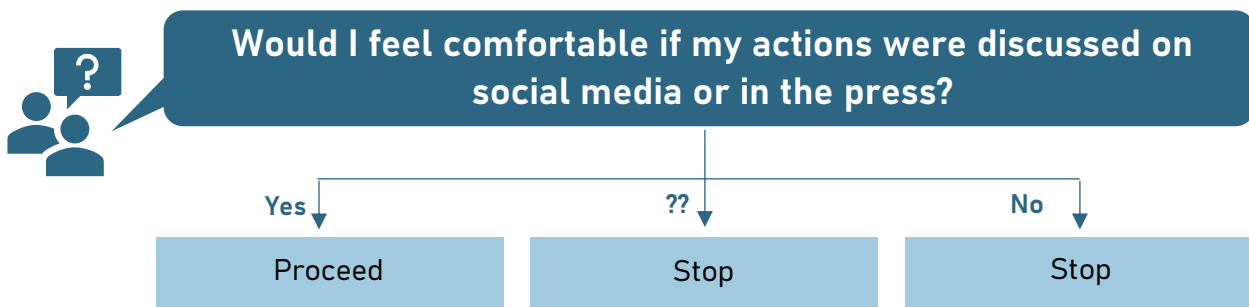
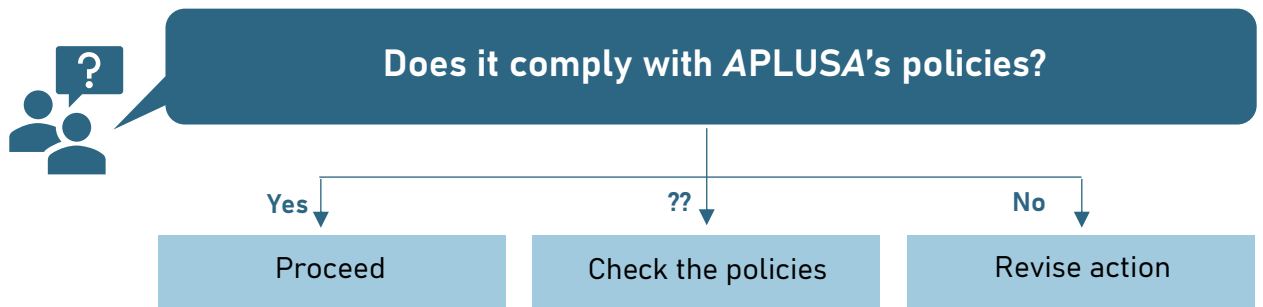
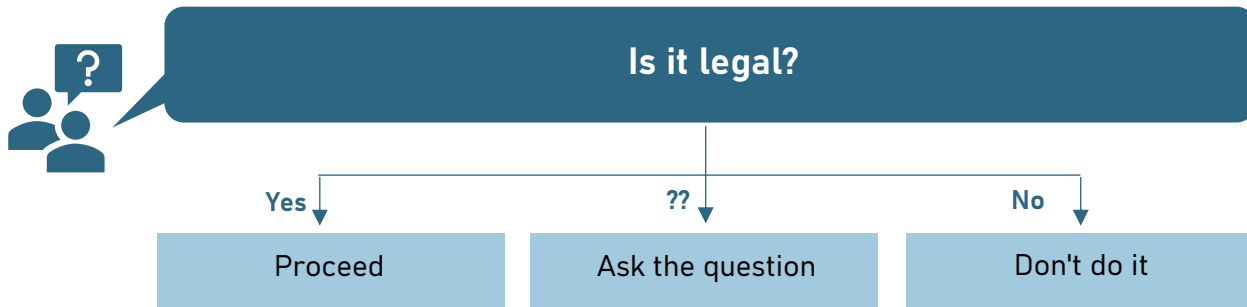
Our Code applies to all employees worldwide, as well as to any APLUSA representative and subcontractors or suppliers. This means that each of us bears responsibility for complying with our Code, APLUSA's policies and the law in all of our daily activities, without exception. We are all expected to make ethical decisions and to respect not only the letter, but also the spirit of the laws, regulations and guidelines that govern our work.

While we are all expected to comply with our Code, some of us have additional responsibilities. This applies in particular to managers, who must set an example for other employees by adopting an irreproachable conduct. If you are a manager, you must create and maintain a work environment in which employees understand what is expected of them and are comfortable enough to raise their concerns and report any inappropriate behaviour to you. Regardless of your position at APLUSA, you should always lead by example and integrate the application of the Code into your daily work.

APLUSA expects total commitment to compliance with this code by all its subcontractors or suppliers.



Making the right decisions means asking the right questions: :





Promote and maintain a stimulating, creative and non-discriminatory work environment for all employees and partners, while respecting diversity and the dignity of the individual.

In practice

In all countries where APLUSA is present, comply with the national legal and regulatory provisions applicable to individual rights and employment law.

Be open-minded and unbiased about the opinions, appearance and attitudes of colleagues.

Respect others and conduct yourself with others as we would all like others to conduct themselves with us.

Do not hesitate to approach your superiors or the Human Resources Department if the principles laid down in this chapter are violated.

Promote respect for employees and their professional development.

We must be a united team and pursue the same objectives for APLUSA. We recognise that each member plays a unique and important role, and we create a positive and productive work environment where our employees can perform at their best.

Working conditions

Relations between employees must be based on trust and mutual respect, ensuring that everyone is treated with dignity and fairness. We therefore make sure that everyone has harmonious and law-abiding working conditions.

- We forbid any form of forced or compulsory labour as well as any undeclared work.
- We forbid child labour. Regardless of the country, even if the legal limit is set at a lower age, we do not hire employees under the age of 18.
- Given the diversity of our locations and local working time regulations, we aim not to exceed 40 hours for the standard weekly schedule and 50 hours including overtime. All employees have at least two days off per week, except in exceptional circumstances.



Health and safety

We implement a health and safety policy which applies in every country where we operate and aims to guarantee each of us a safe and healthy working environment. Each of us must integrate this health and safety dimension into our behaviour by respecting instructions and alerting us to any possible risk that we may have identified.

APLUSA undertakes to:

- Be attentive to the working conditions of employees and prevent any situation or event likely to expose them to physical or psychosocial risks
- Ensure that employees are not subjected to sexual or moral harassment, or physical or psychological violence at work
- Help employees to achieve a work-life balance as well as possible by monitoring workload and working conditions
- Protect workplaces: Not allowing any unauthorised person to enter the premises

Equity, diversity and inclusion

We are committed to ensuring equal treatment and equal opportunities for our employees. For their recruitment, remuneration and development within APLUSA, only their professional skills are considered.

We make no distinction between people based on their social or ethnic origin, sex, age, family situation, sexual orientation, genetic characteristics, nationality, surname, political opinions, trade union activities, religious beliefs, physical appearance, health, disability or pregnancy.

We promote the professional development of our employees based on appraisal interviews which are based, for managers, on globally standardised guidelines and documents. We ensure that internal job offers are open to as many people as possible in order to facilitate geographical and professional mobility.

We consider diversity an asset for APLUSA. We promote initiatives that help develop team diversity in all its components: gender equality, mix of ethnic and social origins, place given to young people and seniors, integration of people with disabilities.

Social dialogue

APLUSA engages in an active dialogue with employee representative bodies, respecting independence and freedom of expression. We encourage individual expression by employees through various interviews (annual, professional) and adopt a listening attitude towards them.

APLUSA is committed to conducting collective negotiations in order to build a solid social base.

Training and skills development

APLUSA attaches great importance to training as an essential factor in the development of skills and the professional development of our employees. New recruits or employees who change jobs benefit from training to facilitate their integration into their new environment. A welcome booklet is given to all new arrivals.



Questions & Answers



One of my colleagues keeps talking disparagingly about a foreign member of our team and openly shows a lack of consideration for them. Beyond the negative impact of this behaviour on our working environment, I feel embarrassed by his attitude. What should I do?

- Your colleague's attitude does not promote team spirit and is also contrary to the company's ethical principles regarding the fight against discrimination of employees (as of any third party) based on their origin, race, gender or religious affiliation.
- Do not hesitate to report this situation to the Human Resources department, which will be able to quickly check the facts and take the appropriate corrective measures, if necessary.

In the car park, people sometimes drive their cars recklessly, ignoring the traffic rules. Do these rules only apply on public roads?

- Regardless of road safety rules, driving with caution (whether in a Company vehicle or your own vehicle) is the minimum respect that everyone owes to their colleagues and to the property made available to them by the Company. The Company does not tolerate any lack of respect for traffic rules, as it is responsible for providing a safe working environment for everyone employed at its sites. In the event of injury or damage, the repercussions can be serious for anyone who has failed to comply with the regulations.



Personal interests of employees and Group interests

In practice

Comply with the legal and regulatory provisions applicable to conflicts of interest, the codes of international (ESOMAR, EphMRA, etc.) or local (ASOCS, BHBIA, Intellus, MRS) professional associations of which APLUSA is a member.

Politely but firmly refuse any gift or invitation that may be offered and that may make you feel indebted.

In some countries, refusing a gift from a professional partner may be culturally frowned upon, or even harm future professional relations with the latter. In this case, you should discuss with your superiors how the gift will be treated.

Assess situations to identify the risks of conflicts of interest when they arise.

In situations where risks of conflict of interest are identified, speak to your superiors before any decision is made.

All employees may be confronted with situations where their personal interests may conflict with those of the company. Anything that may appear to be a conflict of interest can generate problems and harm APLUSA's reputation.

Personal interests must be understood in the broad sense of the term, since they include the interests of the employee as well as those of any natural or legal person around them. In order to prevent situations of conflict of interest, employees must be alert to situations in which the objectivity of their professional decisions could be impaired. This is particularly the case for:

External undertakings

Any investment in a competitor, a supplier or a customer, whether it is an acquisition of interest (unless it involves acquiring securities of listed companies) or a professional activity, must be the subject of a prior declaration to superiors. Indeed, this type of situation can alter the objectivity incumbent on all employees when they commit the company.

While all employees are entitled to participate in association activities in a personal capacity, they must ensure that they involve no conflict of interest with the company.

APLUSA respects the political convictions and personal commitments of its employees, but they must be pursued on a personal basis, that is to say outside working hours and at the personal expense of the employees. Consequently, APLUSA employees are strictly forbidden from engaging the Company in political support or political demonstration activities by mentioning the name of the Company, or by using its letterhead, funds or resources. Similarly, the premises and equipment of APLUSA cannot be used for or to accommodate personal political activities.



Personal relations

Employees may have relatives whose private interests are linked to the company's business. Where this link is identified and the objectivity of the company's decision might be challenged, the employee must inform their superiors of the existence of this link before any decision is taken and refrain from any interference in the decision-making process.

Gifts or any other benefits other than symbolic ones*

** The nature of a symbolic gift is assessed in each country, depending on the legislation, culture and economic environment*

Gifts and invitations are **never trivial** in business life: while these practices help to strengthen business ties and create a climate of trust, they can also influence your behaviour and challenge your **impartiality**.

It is forbidden in principle to give or receive gifts or invitations except for customary acts of courtesy or hospitality and if they:

- Are not likely to render the acceptor indebted or dependent on the giver;
- Do not occur during a period of negotiations or decision-making that may benefit the giver company;
- Are part of a professional framework and are granted or received transparently;
- Have a very reasonable value. In this respect, gifts or invitations, depending on their amount and frequency, must be reported to and/or authorised by the line manager.

When it involves people collaborating or wishing to collaborate with the company, this type of practice can also create a conflict of interest. Indeed, such action can give its beneficiary the feeling of being indebted and therefore call into question the objectivity of their decisions.

Conflicts of interest have consequences for both the employee and APLUSA. As far as the employee is concerned, these consequences are of a disciplinary nature and lead to a loss of personal credibility. With regard to APLUSA, the range of consequences includes financial sanctions and fines, legal proceedings, investigations decided by the authorities involved and the deterioration of the company's image.

For further information, see [our anti-bribery training \(RG_GUID_06\)](#)



Questions & Answers



My brother runs a promotional document printing company known for the quality of its services. In my capacity as a manager in charge of organising an information campaign, can I offer him this project, given that his company is the most attractive offer?

- You can put forward this offer. However, you must inform your superior of your relationship with this potential professional partner so that the decision is made in an objective and informed manner, and you must refrain from participating in the decision-making process.

I am in charge of recruitment. A vacancy has been advertised, and one of the applicants who I believe meets the criteria for the position is a close relative. What should I do?

- You must disclose your ties to the applicant, refrain from participating in their interview, and not seek to influence your colleagues in their favour. You must refrain from participating in their evaluation.

The service provider I work with regularly suggests that we extend our discussion over lunch. However, this is the third time this month. How should I respond?

- I must refuse these repeated invitations. Beyond their monetary value, regular invitations from my partner impair my judgement and might influence my decision-making. If in doubt, I should ask my line manager.



Banning corruption in all its forms

In practice

Respect legal and conventional provisions on the fight against corruption and illicit payments (such as the 1997 OECD Convention or the Foreign Corrupt Practices Act (FCPA) in the United States) wherever APLUSA conducts business, and ask service providers to do the same.

In the context of relations with health professionals, comply with the rules and procedures in force in the company, and in accordance with the Anti-Gift Law/DMOS/Bertrand Law and any local regulations having the same purpose.

In the context of relations with service providers, certain warning signs may be indicators of a risk of corruption on their part. Particular attention must be paid to:

- the service provider's reputation in the country;
- contracts, which must precisely describe the missions of the parties;
- methods of payment of commissions within the framework of agreements with agents and consultants: beware of large, unjustified down payments;
- invoices, which must detail the services;
- fees, which must correspond to market prices for equivalent services.

If in doubt, check with your line manager, the Legal Department and/or the Quality Department or Management before making any decision.

In all the countries where it operates, APLUSA is fully committed fighting corruption in all its forms. It expects all its employees, in performing their functions, not to offer, neither directly nor indirectly, any money, gifts, services, or advantages of any kind to civil servants, politicians, political parties or any other natural or legal persons, to convince them to perform or refrain from performing any act which falls within, or which is facilitated by their activity or their function.

For several years now, the fight against corruption has intensified and become more globalized thanks, in particular, to the establishment of a stronger legislative framework resulting from international conventions and national legislation. These regulations, which aim to prevent and punish corruption in international trade but also in private relations, incriminate:

- Acts of active corruption, i.e., situations in which an undue advantage (money, gift, service, etc.) is offered or promised with a view to obtaining from a public official, or from any person, that they perform or refrain from performing any act which falls within, or which is facilitated by their office or mandate;
- Acts of passive corruption, i.e., situations in which a public official or an individual solicits or accepts offers, promises of money, gifts, services, or advantages to perform or refrain from performing any act that falls within or is facilitated by their office or mandate.
- Influence peddling, which is an offence similar to corruption, is also punished. It consists of offering or promising an undue advantage to a person exercising a real or supposed influence on public authorities to guide their action.



The regulations punish both “direct” and “indirect” corruption, i.e., corruption carried out by third parties acting in the name or on behalf of companies or individuals.

Penalties, for companies and individuals, can be civil and criminal in nature and take the form of heavy fines and imprisonment.

Furthermore, acts of corruption committed in one country may lead to **civil and criminal proceedings** not only in that country but also in another country, given the extraterritorial application of certain rules.

Finally, acts of corruption expose their perpetrators, in particular companies, to **significant negative business consequences** (loss of contracts) and in terms of reputation and image.

For further information, see [our anti-bribery training \(RG_GUID_06\)](#)

Refusing and preventing fraud

Fraud is the intention to deliberately deceive others in order to obtain an illegitimate benefit or to evade a legal obligation. It translates into an action (false report) or an omission (not recording an accounting transaction or recording it in a deliberately inaccurate manner) in order to allow the misappropriation of funds, equipment, or information.

The following therefore constitute fraud:

- Falsifying accounting documents to allow financial flows to be diverted for the benefit of oneself, third parties or the company
- Forging cheques for respondents

Any fraud, whatever its objective, always harms the company. It can affect its financial situation or expose it to sanctions (e.g., falsification of financial statements, deception regarding the quality of services). It can constitute a criminal offence, punishable by fine and/or imprisonment.

All forms of fraud are prohibited. All transactions carried out by the company involving tangible or intangible assets, and the resulting financial flows, follow precise procedures based on accounting standards and internal control.

In practice, all employees must ensure that the following commitments are fulfilled:

- The operations and transactions carried out within the company are honestly and faithfully recorded in the books, in accordance with the regulations in force and internal procedures;
- When making accounting entries, it is essential to be accurate and honest and to ensure that documentation exists for each entry;
- Any transfer of funds requires special vigilance, in particular as to the identity of the recipient and the reason for the transfer;
- Any granting of a commercial advantage to a customer requires strict compliance with the instructions put in place within APLUSA

Furthermore, employees who have company means of payment in their possession must take special precautions to avoid any risk of misappropriation of these means of payment for fraudulent purposes; keeping cheques under lock and key...



Questions & Answers



I understand that the Company cannot offer a gift to a public official. However, can I offer this official a gift out of my own funds to thank them for their help in obtaining a contract with a government organisation?

- In all cases, whether such a gift is made to a public official by yourself, out of your own funds, or by the Company, it still constitutes an offence. It is in fact illegal to make such a gift. By doing this you would be putting the Company and yourself at risk. Furthermore, within the framework of increased cooperation between States that have ratified international anti-corruption conventions, such as the OECD convention of 1997, acts of corruption committed abroad can also be criminally prosecuted in your native country.

I have noticed that an accounting or supporting document has disappeared, has not been provided or does not reflect the reality of the transactions. What should I do?

- A situation such as this may constitute fraud. I will immediately notify my manager as well as the financial department.

Protecting personal data: a fundamental right

In practice

Process personal data in accordance with data protection regulations, in particular in accordance with the European General Data Protection Regulation (GDPR), and respect the rights of the natural persons concerned, whether they are employees, clients, business partners or other stakeholders.

Store this data only for the time needed to fulfil the purposes of the processing, in compliance with applicable local laws.

Ensure the security of the data processed.

Only collect, use, disclose or store personal data for a specific, legitimate and necessary purpose.

Protect these data during its collection, processing, use, communication, storage and international transfer.

Make sure the people whose data are collected are informed and allow them to exercise their rights.

If in doubt, check with your supervisor or the DPO.

APLUSA develops and maintains relationships with its clients, employees, and other partners (doctors, patients, service providers, representatives of the scientific community, etc.). In this professional context, APLUSA needs to collect, store and use personal data that concern them.

Through this Code, we wish to describe and remind people of our professional ethics and our commitments regarding the protection of personal data.

Personal data are information that directly or indirectly identifies a natural person (e.g., name, date of birth, social security number, photograph, e-mail address, computer identifier, etc.).

These data must be collected in an explicit, lawful and transparent manner. These data must be used for legitimate purposes only, kept according to measures that protect their integrity, and for a period that cannot be longer than necessary.

In addition, and in accordance with the principle of minimisation, APLUSA only processes the data it needs to fulfil its mission.

Measures must be taken to allow data subjects to exercise their rights. Requests can be sent to dpo@aplusaresearch.com.



If APLUSA needs to outsource the processing of European Personal Data and/or transfer the European Personal Data outside of the European Union, the selected subcontractors must comply with data protection laws as well as APLUSA's instructions and contractual conditions on data protection. In particular, the latter state APLUSA's requirements relating to data breaches and to how the rights or complaints of data subjects are handled, as well as the ban on the use of non-approved subcontractors.

Where applicable, the international transfer of data is strictly regulated and subject to the regulations in force.

For further information, see [our GDPR policy and commitments \(RG_POL_01\)](#) and our [GDPR training \(RG_GUID_05\)](#)

Questions & Answers



A friend who does not work at APLUSA asks me for the email addresses of my colleagues for professional use. Can I send him this list?

- Any time we send information containing personal data, we must think about its protection, because it can be circulated to other people. In all cases, the agreement of the persons concerned must be obtained before information concerning them is disseminated.



Protecting sensitive and confidential information

In practice

Ensure compliance with:

- Rules for the distribution, reproduction, preservation and destruction of documents or any other information medium
- Specific rules for IT security and safety
- The requirement not to disclose confidential information to people outside the Company, always striving to be vigilant during conversations in public places (e.g., train, aeroplane, restaurant, seminar, etc.).

Before communicating sensitive information to third parties, check with Management about whether a confidentiality agreement needs to be signed in order for any specific protective measures to be taken.

Report to your line manager or Management any anomaly which may indicate that the protection or confidentiality of sensitive information may have been affected (disappearance of documents, abnormal request for information, clues suggesting the manipulation of information systems, etc.).

Any information that is not public must be protected, even in the absence of a formal duty of confidentiality, whether it is information concerning the Company, its Clients, its Employees or Third Parties. Furthermore, we are formally bound to protect our clients' data under the framework contracts we sign.

All necessary measures must therefore be taken to ensure their protection, whatever their medium, as well as their storage in a safe place. Indeed, the dissemination of such information may constitute a breach of confidentiality undertakings given by APLUSA to its clients, as well as a violation of business secrecy.

It is essential therefore to ensure that this sensitive information is protected and to carefully assess any situation where its distribution outside the Company may be envisaged, even in the context of business relations already established with third parties.

Examples of confidential information include, in particular, information relating to:

- Our know-how, our methodologies, or our commercial data (prices, etc.)
- Financial results
- Strategic plans of our clients
- Upcoming promotional campaigns of our clients
- Personal Data of our employees

We know it can be difficult not to talk about our work and what you learn about in the course of your duties, but it is essential for our business. Don't forget: think before communicating any information.

For further information, see [our IT Charter \(CS_POL_02\)](#)



Questions & Answers



During a meeting, a person who I don't know introduced himself to me as being the marketing manager of an agency selected for a campaign that we have been commissioned to test for one of our clients' products, but he was not introduced by our client. Can I go ahead and provide this person with confidential information sent by our client and the study material?

- Until this person has been formally introduced by our client, we must refrain from providing him with the information received from our client or relating to our work for this client. If our client agrees, a confidentiality agreement must be signed.



For fair and honest exchanges within the framework of free competition

In practice

Comply with legal and regulatory provisions, both national and international, relating to competition law.

At forums, seminars or any other type of meeting, avoid informal contact with competitors so as not to discuss subjects likely to violate the antitrust laws in force. If, however, one or more competitors address the subject, express your discomfort about continuing the conversation. Do not hesitate to express your disagreement with the subject of the discussion and to put an end to it.

Check with your line manager, the Legal Department and/or the Quality Department or Management if you have questions or doubts.

APLUSA complies with applicable regulations prohibiting unfair commercial conduct, excessive trade restrictions and monopolies.

Violating antitrust and competition laws can result in fines and may harm the company as well as the individuals involved. Furthermore, in some countries, serious violations, such as unlawful price-fixing agreements or market allocation among competitors, are punishable by imprisonment. Problems related to competition and antitrust activities may arise both from contacts between APLUSA and its competitors, and from its relations with its suppliers and clients. APLUSA is extremely vigilant on this subject and has implemented a number of measures intended to prevent and avoid anti-competitive acts taking place.

Contacts with competitors known as “horizontal agreements”

The following topics in particular must never be discussed with our competitors:

- **Prices:** rates, pricing methods, discounts, promotion and invoicing conditions, margins, rebates
- **Information about products and services**
- **Market distribution:** by geographical area or customer, or by field of treatment
- **Financial information:** costs of goods and services purchased, profits, margins
- **Whether or not to take part** in a call for tenders
- **Existing agreements or contracts with suppliers or clients**

Relations with suppliers and clients known as “vertical agreements”

In the context of relations with both suppliers and clients, in most countries, any implementation of discriminatory practices or boycotts constitutes a violation of competition law.

Furthermore, any information that we may collect about the competition must only be collected by ethical and legal means.



Questions & Answers



I received an invitation to a conference that will be attended by a friend who holds a position equivalent to mine at one of our competitors. Before this conference, I found out that our two companies are going to take part in a call for tenders from the same client. Can I discuss this call for tenders with him, whether at the conference or not?

- First of all, you must be very careful about discussing any price or cost-related matter with any of our competitors. It is therefore advisable to avoid discussing this call for tenders with your friend, whether in a professional context (conference) or in your personal relations. Bear in mind the principles stated in this chapter, and do not hesitate to check with Management to make sure there is no risk of you violating applicable competition laws.

I would like to know the sales volume or the new offers being made by my competitors. Is it wrong to try to get this information from the sales manager of one of my competitors?

- This is strictly forbidden and likely to constitute (to be interpreted as) an agreement. It is essential to refrain from seeking, obtaining or collecting such information, which is considered sensitive. You can however make use of public information and surveys carried out regularly by survey organisations.



Obtaining service provider compliance with the Group's ethics

In practice

Research the service provider's reputation ahead of time.

Ensure that service providers comply with legal and contractual provisions.

Check with your line manager if you have any questions or doubts.

Comply strictly with current regulations forbidding any discrimination against suppliers. Strive to promote the diversity of suppliers used by applying fair, honest and non-discriminatory selection criteria.

APLUSA requires all the service providers it works with to respect the highest ethical standards and the principles set out in this code, in all of their activities.

In the field of human rights and working conditions

APLUSA is keen to ensure that its service providers respect the fundamental principles set out in the International Labour Organization Convention, particularly those relating to child labour, forced labour, working hours, remuneration conditions, freedom of expression, equal opportunity.

In matters of conflict of interest

APLUSA expects its service providers and suppliers to inform it of any conflict of interest that could affect the performance of the missions or services entrusted to them by the Group.

In the field of anti-corruption

APLUSA requires the company's service providers to comply with national and international anti-corruption laws and regulations, in particular by including specific anti-corruption clauses into contracts and ensuring permanent compliance with them.

APLUSA requires the company's service providers to respect and apply the rules and principles of APLUSA regarding the prevention of corruption and is particularly vigilant when these service providers may have to act on behalf of APLUSA.

For further information, see [our anti-bribery training \(RG_GUID_06\)](#)



Diversity of service providers

As part of its activities, APLUSA may work with various service providers. Service providers are chosen in strict compliance with the regulations in force, using honest and relevant criteria. Any form of discrimination (even positive) is strictly ruled out.

APLUSA supports the use of virtuous service providers, which has a positive impact on society, people or the environment.

APLUSA values the relationship it has with a large number of suppliers of varying size, structure and governance.

APLUSA has a supplier qualification process that takes into account key criteria such as:

- Respect for the international protection of human rights
- Non-discrimination in recruitment
- Sustainable development criteria (environment, social, ethics, health, etc.)
- Absence of corruption in all its forms

Questions & Answers



As an APLUSA employee, what is the right thing to do if your manager offers you the opportunity to work with a subcontractor but you accidentally discover that the latter has already been convicted for corruption which was reported in the specialised press?

- You must immediately inform your manager of this conviction and refuse to subcontract to the said company. The aim of this refusal to preserve the interests and reputation of APLUSA.



For a responsible use of new communication networks

In practice

Comply with the applicable legal and regulatory provisions, in particular regarding the communication of financial information, respect for copyright, privacy, business secrecy and confidentiality.

Unless expressly authorised, do not speak for or on behalf of APLUSA.

Carefully consider your vocabulary and the words used in the context of any communication. These must not contain insults, nor be of a political, religious, sexual or racist nature.

Do not comment on any words spoken by other Group employees or concerning Group partners (suppliers, healthcare professionals, competitors, etc.).

Report to the Management any discussion occurring on the web or any negative comment concerning APLUSA.

Social media, new communication tools

Our employees love talking about APLUSA. We encourage this enthusiasm but ask that you bear the following guidelines in mind:

- **Communication ground rules:** we are aware that individuals who communicate with third parties in the course of their work at APLUSA may share APLUSA-related information on social media. We are glad to know that you are proud of your work and that you want to share it. However, please remember never to share confidential information or personal information that could identify any APLUSA employee.
- **Refer any enquiries:** Certain people are authorised to speak on behalf of APLUSA. They will ensure that the right messages are communicated to protect our information and our reputation, avoiding:
 - Inadvertently disclosing confidential information
 - Making promises that APLUSA may be unable to keep
 - Making statements contrary to our Code or our values and damaging our reputation
 - Implying the existence of unethical or illegal activities

Use social media following certain rules:

- **Protect our reputation:** Anything you post on social media is public information and what you say may have an impact on APLUSA. You must therefore ensure that your messages respect our code and our values.
- **Speak on your own behalf:** You can express yourself on social media as long as you respect data confidentiality. An inaccurate or inappropriate message could create a negative perception of APLUSA or expose us to legal jeopardy.



- Be polite: You are responsible for the content of your messages. Think of social media as a conversation that should be kept friendly and helpful. Avoid overly tense discussions and never post anything insulting.

For further information, see [our IT Charter \(CS_POL_02\)](#)

Questions & Answers



Can I post some very funny photos of some of my colleagues taken during the end of year party organised by the company on my personal blog?

- You should not only ask for permission from the people concerned in advance, but also ask yourself the following question: what image will I give of myself, my colleagues and my company by posting these photos online?

I work for APLUSA and have identified myself as such in my LinkedIn account. Am I entitled to do this?

- Yes. Some tools like LinkedIn are intended for the development of professional networks so it is acceptable to identify yourself as an employee of the company. Make sure your messages on this tool are factual and professional.



In practice

Integrate sustainable development issues into APLUSA's strategy so as to contribute to reducing our consumption.

Develop and integrate CSR-related issues at the highest level of the company.

Engage and involve employees in social and environmental issues.

Developing while respecting the environment

Meeting the needs of the present without compromising the ability of future generations to meet their own needs, such is the challenge of sustainable development.

APLUSA takes this approach by integrating protection of the environment and natural resources into its strategy and processes, using the best technology, considering and consulting with third parties (suppliers, service providers, clients, etc.) in decisions affecting the company.

This approach is embodied in a set of rules and an action plan drawn up in compliance with the regulations and which must be respected by every employee.

APLUSA is developing its production by aiming to limit the environmental impact of its products and services.

Staff mobility is essential, as it is required to visit group offices or partners. APLUSA is adapting its operation to allow its staff to work remotely, guaranteeing a high level of service for our partners, while reducing the carbon footprint associated with these journeys.

At the group's various sites, APLUSA ensures compliance with environmental regulations, optimising the energy consumption of buildings and the recovery of waste (paper, computer equipment, etc.).

APLUSA includes a clause in customer/supplier contracts requiring compliance with regulations on the environment, human rights and working conditions.

This approach, which is shared through multiple gestures and individual or collective initiatives, now makes it possible to structure APLUSA's ambition to propose and deploy a concrete roadmap that is more readily understandable to its employees and partners.



A corporate citizen

In practice

Respect the laws and regulations regarding people's freedom of association and the right to participate in public life.

Do not engage APLUSA in any activity that supports any kind of political party or any of their representatives, under mandate or not.

APLUSA respects the commitments of its employees who, as citizens, participate in public life. But it intends to remain politically neutral.

Therefore, all employees must exercise their freedom of opinion and political activity outside their employment contract, at their own expense and on an exclusively personal basis.

No employee or representative of APLUSA is authorised to engage the Company directly or indirectly in any activity in support of a political party or to boast of belonging to APLUSA in their political activities.

Any use of APLUSA's resources or granting of donations or financial contributions to support, in any way whatsoever, whether directly or indirectly, activities or political parties, candidates for political office, at local, national or international level is **strictly forbidden in France**.

In other countries such contributions are authorised and/or subject to legislation. APLUSA's general policy is not to contribute directly or indirectly to the financing of parties or politicians.

Contributions to charity and sponsorships are authorised if they are actually in the interest and contribute to the civic action defined by APLUSA. They are subject to prior written approval by the Chairman and are duly recorded.



Rights and duties of employees

In practice

Respect the laws and regulations as well as the principles set out in the Code of Ethics.

Refer to the Code and the company's values to ensure you behave ethically in all circumstances.

Identify and analyse, in good faith, without intent to harm, any situations and actions that appear to contravene the rules set out in the Code or pose undue risks to the Company.

If you have any questions or doubts, contact your line manager and/or management.

If an employee or a third party believes, in good faith, that a law, regulation or one of the principles set out in this Code of Ethics is or is about to be violated, they may, in compliance with the rules applicable to the country where they live and work, report their concerns through the channels made available to them.

To make a report, first speak to your line manager or your usual APLUSA sales contact. If you are not comfortable with that, you can send an email to alertaplusa@gmail.com

Regardless of the reporting system used, the person(s) who receives the alert is required to respect the anonymity of the whistle-blower.

For further information on the whistleblowing system in place at APLUSA, refer to the following procedure: [HR_PROC_11_Whistleblowing_System](#)



Formalities and Filing

This Code of Ethics is established for an indefinite period after prior consultation with staff representatives.

This Code of Ethics cancels and replaces any previous agreement or practice, whether written or verbal, whatever its form, from its date of entry into force.

It was communicated on 17 April 2023, in duplicate, to the relevant employment inspectorate at 8-10 rue du Nord, 69625 VILLEURBANNE CEDEX, and filed on 17 April 2023 with the relevant Employment Tribunal Secretariat at 20 Bd Eugène Deruelle - 69003 LYON.

This Code of Ethics will be communicated individually to all staff members and posted on the Management notice board. It will come into force one month later, on 17 May 2023.

Lyon, 14 April 2023

For the AplusA Group
Pierre PIGEON
Chairman

For the Works Council
Marie-Christine NARBONNE
Secretary



HEALTHCARE MARKET
RESEARCH WORLDWIDE