

**Caring  
People.  
Improving  
Lives**



## **PARTNER CODE OF ETHICS**



# PARTNER CODE OF ETHICS

A Partner is considered as any individual, organization, or entity that works with Acteon Group to achieve mutual business objectives. This term encompasses a variety of stakeholders, such as suppliers, service providers, dealers, healthcare professionals, strategic partners, public authorities etc...

## 1. Diversity, Respect and Human Rights

**Acteon Group guarantees equal opportunities and encourages diversity at all levels. As such, equal levels of exigence are required from its Partners.**

The Partners are required to meet legal and ethical requirements regarding, without limitation, human rights and Labour Law. Furthermore, the behavior of employees towards Partners, particularly in the extracontractual context, must follow certain rules to guarantee the independence of Acteon Group.

Acteon Group is committed to collaborating with those Partners who agree to comply with the rules specified in the International Labour Organization Conventions, the Universal Declaration on Human Rights and the main principles of the OECD.

More specifically, Partners must, as a minimum, adhere to the Framework Convention and the main principles of the United Nations in relation to companies and human rights, and the Partner shall respect all human rights, amongst which are: the right to freedom of association and collective bargaining, the prohibition of forced labor, the obligation to employ workers in a lawful manner, the prohibition of child labor. Partners shall also ensure, when relevant, they import minerals and metals from responsible sources only (and not from a conflict zone).

## 2. Anti-corruption

**Acteon Group is committed to fighting corruption in all its forms. An activity related to corruption is NEVER acceptable, whether the act is committed by Acteon Group employees or by a Partner operating on Acteon Group's behalf. Partnerships with Partners must ALWAYS be based on ethics and fair trade. Breaching these rules might lead Acteon Group to use any legal means at its disposal.**

### Definition

Corruption is the act of offering, giving, receiving, or requesting gifts, meals, benefits, or favors ("undue advantage") to influence someone's actions or decisions within their duties or responsibilities. Both active and passive corruption are punishable by law. It does not matter whether the item of value comes from Acteon Group, a Partner, or the employees themselves. Simply offering something of value can violate the law, regardless of whether it is accepted or results in any benefit.

## PARTNERS' COMMITMENTS

As part of fostering ethical and transparent business practices, the Partner commits to upholding the highest standards of integrity and compliance with anti-corruption principles. The following commitments outline their dedication to preventing and addressing corruption in all forms:

- Respect all laws and regulations regarding trade (anti-corruption, conflict of interest, competitive regulations, etc.)
- To not offer, give, or accept any bribes, gifts, or undue advantages to influence decisions.
- Maintain transparent and accurate records of all transactions and dealings.
- Implement and enforce internal policies to prevent and detect corruption.
- Report any suspected corruption or unethical behavior to the relevant authorities or Acteon Group.

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- To not use or share Acteon Group's confidential information, or any trade secrets, without prior approval from Acteon Group.

## HEALTHCARE PROFESSIONALS' COMMITMENTS

In addition to the above commitments, Partners that are Healthcare Professionals are subject to specific legislations such as the Sunshine Act (US), the Anti-Gifts and Transparency law (France). The Healthcare Professional commits to uphold the highest standards of integrity and comply with applicable legislation.

### 3. Health Safety and Environment

Partner undertakes:

- That its operational and management systems, as well as its employees, actively contribute to the prevention of injury and illness at work,
- That it respects all currently applicable legislation regarding the environment.

### 4. Audit

Acteon Group reserves the right to evaluate compliance capacity before signing any contract with Partners and perform audits of Partners during execution of a contract, in order to check the conformity of their activity to legal and ethical requirements.

Acteon Group reserves the right to audit the quality of Partners' services (including a "background check" and "due diligence"), and the reality of and the documentation for the services supplied.

### 5. Whistleblower

Acteon Group provides Partners with a whistleblowing system that enables them to express, in a disinterested manner, in good faith and free from rumors, their concerns and report illegal behavior or practices contrary to the Code of Ethics in a secure and confidential manner without fearing for their safety or business relationship.

The whistleblower may solicit Acteon Group's Ethics Committee via email at [comitedethique@acteongroup.com](mailto:comitedethique@acteongroup.com) or contact the competent public authority (defender of rights, judicial or administrative authorities, professional authorities, etc.).

Whistleblowers acting in good faith are protected against any form of reprisal. The perpetrators of reprisals will be systematically punished in accordance with the present Code of Ethics and the sanctions provided for in the internal regulations.