



CODE OF CONDUCT

*for all Mériex Foundation
employees*





A WORD FROM THE DIRECTOR GENERAL

"The Mérieux Foundation is committed to the fight against infectious diseases in countries with limited resources, by strengthening local capacities in a collaborative dynamic since its creation in 1967 by Dr. Charles Mérieux.

Because it has always given priority to action in the field, as close as possible to the communities the Mérieux Foundation's projects are carried out in complex environments, particularly affected by security, economic or political crises.

In order to ensure that the Foundation's mission is carried out with vulnerable populations, it is crucial to implement the activities in compliance with the rules and with our values. The management team is fully committed to this approach and expects all its staff to be part of this ambition of integrity, equity and respect.

This Code of Conduct aims to present the values of our Foundation: it illustrates, in a practical and concrete approach, the fundamental principles to be respected and sets the framework for our daily interactions.

It should guide us in our commitment to public health with our beneficiaries, but also in our relationships with our partners.

I thank you for your involvement and count on your commitment to embody the culture and key values of the Mérieux Foundation."

Jean-Pierre Bosser,
Director General of The Mérieux Foundation



Introduction

The Mérieux Foundation, set up in 1967, aims to contribute to global health by strengthening local capacity in developing countries to reduce the impact of infectious diseases on vulnerable populations. This includes the following activities:

- Increasing access to diagnosis for vulnerable populations by strengthening clinical biology laboratories in national health systems;
- Reinforcing local applied research capacity by setting up Rodolphe Mérieux Laboratories and handing them over to local entities, training researchers and developing collaborative programs;
- Developing the exchange of knowledge and public health initiatives with the Les Pensières Center for Global Health;
- Supporting mothers and children as part of a global healthcare approach.

The Foundation has been active in more than 20 countries worldwide.

It works with national governments and administrations to respond to local needs, ensuring it prioritizes development aid. As a result, the Foundation works with Politically Exposed Persons in these countries.

In this context, the Foundation is aware that administrative, legislative, and cultural differences

are likely to generate difficulties in the application of the principles and guidelines established by French, European and international authorities and world organizations on a global scale.

As a result, the Foundation is highly exposed to several kinds of risk because of the missions it fulfills, the funding it receives, and its necessary interactions with key intermediaries such as public decision-makers, government agencies and public officials, as well as with various partners and providers.

Without well-defined preventive measures, the Foundation would remain highly exposed.

This Code of Conduct is an indispensable guide, designed to help each of us make the right choices, at the right time, in an increasingly complex environment. In our daily work, observing and respecting rules of ethics and integrity are paramount. They should guide us in our commitment to public health in our role as a non-profit organization.

Our commitment is essential in enabling us to represent the Foundation's core values and its culture.

WHY A CODE OF CONDUCT?

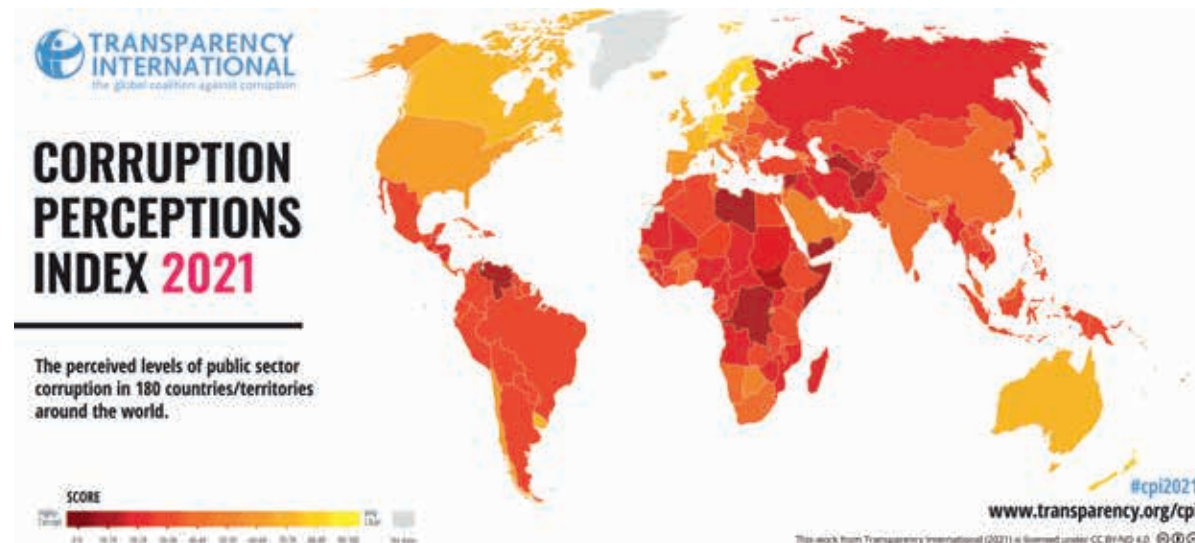
The Foundation is a legal entity under French private law exercising non-profit activities for the common good, in the form of a Foundation with Public Interest status, subject to strict regulations and controlled by the authorities.

First, the Sapin II law of 9 December 2016 requires several actions to be taken with the aim of preventing the risk of corruption in business, including I) establishing a corruption risk mapping, II) setting up a code of conduct so that each employee knows a) the

applicable rules and b) the sanctions enforced in the event of a violation, and III) setting up a whistleblowing system so that everyone can report any doubts about whether certain behavior is compatible with the law.

Furthermore, the Foundation has a high level of exposure due to its missions and locations, for which prevention measures are essential.

Indeed, its projects take place mainly in countries whose rating on the Transparency International index is poor or very poor.



Corruption Perceptions Index 2021 by Transparency International
<https://www.transparency.org/en/cpi/2021> January 25, 2022, Transparency International

ETHICS AND COMPLIANCE ARE EVERYONE'S BUSINESS

Unethical or immoral behavior by any of the Foundation's French or foreign employees could be enough to cause significant damage, result in costly fines or legal proceedings and potentially ruin one of the Foundation's most valuable assets: its reputation.


Managers must set a good example when it comes to ethics and morality. As the leaders of other employees, they must embody the values of the Code by demonstrating ethical behavior and impeccable management. Managers are therefore expected to consider compliance as a determining factor in their decision-making.

All managers are thus responsible for organizing and supervising the employees in their teams. They must ensure that their teams are familiar with the principles of the Code and apply them.

They must be able to answer their questions, even though this duty of responsibility does not relieve the employees of their own responsibility. Managers should refer any questions, serious concerns or breaches of the Code to the Legal & Compliance Department.

The Compliance strategy therefore includes mandatory training sessions, which can be attended either remotely or in person. These training sessions

are necessary to enable everyone to identify and avoid any risks that could harm the image of the Foundation or its employees.

 *If you are a manager, you must ensure that all the employees reporting directly to you attend every training course assigned to them and report back to you.*

USE OF THE MÉRIEUX NAME AND OUR REPUTATION

The name "Mérieux" is used in the corporate name of the Foundation. It is also used by the Institut Mérieux and by the other organizations affiliated to the Institut Mérieux (bioMérieux and Mérieux Nutrisciences, for example).

The name is also used by the laboratories built, renovated or supported by the Foundation, the LRM (Rodolphe Mérieux Laboratories), the CICM (Charles or Christophe Mérieux Centers for Infectious Disease) and other independent organizations such as the Fondation Christophe et Rodolphe Mérieux.

This means that any risk relating to an organization bearing the name "Mérieux" could impact the reputation of the Foundation or other organizations bearing the same name. We therefore owe it to ourselves and to the other organizations bearing the name "Mérieux" to be irreproachable.

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This Code of Conduct is specifically designed to guide us and help us integrate the Foundation's values into our daily work.

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1.

THE OBJECTIVES OF OUR CODE OF CONDUCT

THE CODE APPLIES TO EVERYONE

The Code of Conduct applies to all employees, affiliates, managers, and directors of the Foundation. We also expect our service providers and our partners to comply with the principles set out in this Code.

By following the principles of the Code, we can ensure that we abide by the law and we avoid the potentially harmful consequences of non-compliance. The application of this Code is the responsibility of everyone in the Foundation, as our daily actions have a direct impact on the Foundation and on its programs, activities, and projects, as well as on our partners and the beneficiaries of our actions.

The application of this Code is the responsibility of everyone in the Foundation, as our daily actions have a direct impact on the Foundation.

HOW TO USE THE CODE

This Code of Conduct is specifically designed to guide us and help us integrate the Foundation's values into our daily work. The Code is available in English and French. It is up to each and every one of us to read it carefully so that we understand the expectations of our organization and to refer to it whenever we have doubts or concerns.

The Code is annexed to the Foundation's internal regulations and has strictly the same legal validity.

WHAT IF MY COUNTRY'S RULES DIFFER FROM THE CODE?

Where local legislation sets a higher or additional level of requirement than the Code, that legislation should apply. Conversely, if the Code sets a higher standard, the Code takes precedence over local legislation. However, if there is a conflict between local legislation and the Code, please report it to the Legal & Compliance Department, as indicated in the Help and Contact section.

WHAT HAPPENS IF THE CODE IS VIOLATED?

No unethical or unlawful behavior will be tolerated. All employees are expected to adhere strictly to the principles of this Code. Any employee who violates the Code, or who encourages or permits a violation of the Code, will be subject to disciplinary action up to and including termination of employment.

No unethical or unlawful behavior will be tolerated.



In case of conflict between local legislation and the Code, please report it to the Legal & Compliance Department:

→ **by e-mail: compliance@fondation-merieux.org**

→ **anonymously via the Whispli platform**



Help and contact


The Foundation encourages every employee to express themselves freely. This freedom of expression is essential to the effectiveness of the Compliance process and the application of the Code. Without this freedom of expression, unreported issues are not corrected.

We are counting on all of you to maintain the Foundation's Compliance strategy at the highest possible level. Since you are actively involved in the Foundation's operations, you have the best vantage point for preventing violations of the Code.

By sharing any issues you are concerned about, we will help you to solve them.

HOW TO REPORT INTERNALLY ANY SITUATIONS THAT APPEAR TO VIOLATE THE CODE

There are several options available to you for internally reporting an issue or situation you believe does not comply with this Code of Conduct:

- You can make your report anonymously using the whistleblowing system on the **Whispli platform**. 
- A case manager working for the Foundation will get in touch with you rapidly via the platform to process your report without learning your identity.
- You can also contact your Country/Regional Representative or a senior Manager in any way you choose, together with the Legal & Compliance Department by e-mail at this address: **compliance@fondation-merieux.org**
- Finally, you can choose to contact the Legal & Compliance Department only. In this case, your request is not anonymous but will be treated with the necessary discretion.

In any event, we encourage you to confide in us anonymously or confidentially, rather than remaining silent.

IF I CHOOSE NOT TO REMAIN ANONYMOUS, COULD MY REPORT CAUSE ME HARM?

Employees in any country who share information in good faith and without direct financial compensation about a crime, misdemeanor, threat or harm to the public interest, a violation or attempted concealment of a violation of the law, are protected by the law and by the Foundation.

Any retaliation against these employees is prohibited by law and the Foundation is committed to doing everything in its power to protect them.

Managers can never discourage an employee from raising a concern or complaint through the appropriate channels.

Furthermore, these employees will not incur criminal or civil liability for reporting in good faith and without financial compensation.



During our activities, we may be exposed to various situations that are considered high-risk in that they constitute criminal offences and/or breaches of ethics and probity.

We must learn to spot these situations in order to avoid them: **ZERO tolerance** of these violations is essential and must be the objective of every one of us.

In this Code, you will find information on **the various risks to be avoided**. These risks may arise in different situations with different people.

2.

HIGH-RISK SITUATIONS:

Bribery and other offences relating to ethics and probity

➔ Risks to avoid, a few definitions


FAVORITISM, OR THE OFFENCE OF GRANTING UNDUE ADVANTAGES

➔ What is favoritism?

Favoritism is an offence. In principle, it only concerns civil servants and elected officials, but a member of the Foundation's staff could be a complicit to this offence.

Favoritism occurs when a civil servant or elected official (e.g. a person working in a ministry, or a mayor) gives or tries to give an improper advantage to a candidate in a call for tender, in violation of the laws guaranteeing freedom of access and equality to candidates in public procurement.

The French criminal penalties are severe: a prison sentence of 2 years and a fine of €200,000.

 Note that any favored candidate is also exposed to sanctions, as they are a complicit and a receiver.

Most of the countries in which we work also sanction this offence in their national laws, with prison sentences and heavy fines.


ILLEGAL TAKING OF INTEREST

➔ What is illegal taking of interest?

This is also an offence. Again, it only concerns civil servants and elected officials, but a member of the Foundation's staff could be a complicit to this offence.

Illegal taking of interest occurs when a civil servant or elected official makes a decision in an operation or enterprise, and this decision favors their interests by compromising their objectivity, impartiality or independence in this operation or enterprise.

In cases of unlawful taking of interest, the persons concerned are liable to penalties of up to five years' imprisonment and a fine of up to €500,000.

 Again, note that the beneficiaries of such illegal taking of interest are also liable to sanctions as complicit and receivers.

CORRUPTION

➔ What is corruption?

Active corruption is the act of offering a gift, donation or any other advantage to a natural or legal person, with the objective of causing them to perform an act or refrain from performing an act that is within the scope of their mission. The briber then obtains an undue advantage from the bribe-taker (without the act of bribery, they would not have obtained the advantage).

EXAMPLE Mr AABBC, an employee of the Mérieux Foundation, invites the mayor and his wife to a gourmet restaurant, as he would like the mayor to quickly sign the building permit for the building he is in charge of constructing for the Foundation. Mr AABBC receives the signed permit four days after this dinner.

Passive corruption is the act of accepting a gift, donation, or any other advantage from a natural or legal person, to perform an act or refrain from performing an act within the scope of their

mission. The bribe-taker then obtains an undue advantage for the briber (without the act of bribery, they would not have obtained the advantage).


EXAMPLE Mr AABBC, a Mérieux Foundation employee, and his wife have been invited to a gourmet restaurant by the mayor. During the dinner, the mayor asks if Mr AABBC could give him funding to pay for the new boiler at the school. Mr AABBC agrees.

Bribery takes two forms, active and passive. In both cases, it is a serious offence.

In the public sector in France, a penalty of **10 years' imprisonment and a fine of €1,000,000 (€2,000,000 if part of an organized group) is the sentence for the civil servant or elected official who has accepted the gift, donation or advantage, either to:**

- Perform or refrain from performing an act in the course of their office, mission or mandate or facilitated by their office, mission or mandate;
- Or to abuse their actual or supposed influence to obtain distinctions, jobs, contracts or any other favorable decisions from a public authority or administration.

In the private sector in France, the penalties are **five years' imprisonment and a fine of €500,000 for individuals and €1,000,000 for legal entities.**

 It should be noted that bribery is a punishable offence in many countries. Some countries, such as the United States, have even established extensive connecting factors to ensure that their national laws apply beyond their national borders (e.g. the use of the dollar in a transaction makes American law on bribery applicable).

EXAMPLE The use of the dollar in a transaction makes the U.S. Bribery Act applicable.

Bribery is a crime whether it occurs in the public or private sector, but the penalties are different.

INFLUENCE PEDDLING

This is a form of corruption, and it is also a crime, which can be passive or active.

Passive influence peddling is when a person allows themselves to be bought to use their influence.

Active influence peddling consists of paying someone to use their influence.

Influence peddling is subject to 10 years' imprisonment and a fine of €1,000,000 when it involves an intermediary who is a civil servant or elected official, or five years' imprisonment and a fine of €500,000 when it involves an intermediary who is a private individual.

CONFLICTS OF INTEREST

A conflict of interest is any situation of interference between a public interest and a public or private interests that is likely to influence or appear to influence the independent, impartial and objective exercise of a function.

Conflicts of interest originally existed in the public sector, but the concept has been extended to include the private sector.

In the private sector, a conflict of interest does not constitute an offence as such, but it can degenerate

and contribute to criminal offences of which legal or natural persons can be accused.

In general, any relationship or personal interest that might prevent an employee from making a fair and impartial decision constitutes a conflict of interest and should be avoided.

Employees should refuse or avoid any situation in which a friendly or family relationship may impair the objectivity of their judgment.



In any case, please comply with the applicable Conflicts of Interests Procedure.

If an employee believes that they are in a situation in which there is a conflict of interest, they should inform their line manager and the Legal & Compliance Department immediately in writing,

→ by sending an email to this address: compliance@fondation-merieux.org

→ or anonymously via the Whispli platform. →



↘ Situations exposed to risks

INTERACTIONS WITH OUR FUNDERS

Many of the Foundation's projects receive various types of funding (refer to section 3: How we comply with the rules) from public or private funders.

Ethics and compliance apply to our relations with our funders.

- We must comply with our funders' allocation processes and ensure transparency in our interactions with them, and our decision-making processes must remain fully independent and objective.
- We must be exemplary in the management of these funds and be able to account for their use at any time. Rigorous checks can be carried out on the management of funds from our funders. Any surplus amounts must be returned or reassigned in accordance with the funder's instructions.

We must be exemplary in the management of these funds and be able to account for their use at any time.

How to identify risks?



Case n°1

You are working on a project financed by a public funder. You need to pay for a service as part of this project. This service turns out to be less expensive than budgeted. You use the money you saved to make purchases for another project.

RISK Some of the funds are not used for their original purpose, so you divert them. You are at risk of misappropriation of public funds as well as favoritism.

BEST PRACTICE Ask the funder to agree to the reallocation of the remainder and sign an amendment to the original contract.



Case n°2

A public funder contacts you to ask you to take on a one-off assignment in an area that is outside the Foundation's activities. You tell them that you're not very interested, but the funder tells you that they are going to issue several large tenders that will fully align with the Foundation's missions and make it possible to finance several jobs over three years. They tell you that the Foundation is the best candidate for these future projects, but that they really need you for this initial assignment. Should you accept the one-off assignment in the hope of getting the projects the Foundation is interested in?

RISK By accepting preferential treatment in being selected for future calls for tender from this funder, you become an accomplice to the crime of favouritism committed by the public funder.

BEST PRACTICE Confirm the Foundation's interest in major bids in the future and ask your Senior Manager to politely decline the assignment that is outside the Foundation's corporate purpose.



Main points to remember

→ Keep documents provided in response to calls for tender

→ Use a Go/No Go form to ensure the project's alignment with the Foundation's corporate purpose and strategy

→ Ensure you have a contract to formalize the receipt of funds allocated by any funder

INTERACTIONS
WITH OUR PARTNERS

➔ In the context of relations with Governments, Public Entities, public officials, and elected representatives

To carry out its activities, the Foundation is obliged to interact with the competent local authorities (such as the Ministry of Health, the Ministry of Education, etc.) and to respond to any local needs that are expressed and identified.

During these interactions, no tolerance of unjustified solicitations from Governments and Public Entities to obtain a favor, protection, right or any undue advantage will be accepted.

We must always adopt an appropriate behavior to the circumstances and limited to what can be justified by adapting these rules.

No tolerance
of unjustified
solicitations from
Governments
and Public Entities
will be accepted.

How to identify risks?



Case n°1

The funder who is financing a project asks you to formalize the implementation of the project with the Ministry of Health in the country concerned. To facilitate negotiations for an agreement with the ministry, you invite a ministry official to introduce you and support you in your approach. This official asks you to appoint his son for the project.

RISK You might appear to be using someone's influence to obtain a favor. You may have to pay the intermediary to influence the funder. This could constitute influence peddling and attempted passive indirect bribery. By accepting his request, you become a briber and may be held liable, along with the Foundation.



Case n°2

Having been given the green light from senior management to launch a strategic project in a country, you approach the Prime Minister of that country to implement the project. You propose a scheme involving the local associations that you have identified. The prime minister gives you the contact details of another association and strongly recommends it. You then learn that the prime minister's brother is the president of the recommended association. You express your misgivings to the Prime Minister, who tells you that the project, although fundamental to local public health, will not go ahead without his brother, who is an experienced and trusted person. You agree to approach the association in question as part of your consultation. The Prime Minister's office shows its appreciation by inviting you to a prestigious restaurant.

RISK The Prime Minister is in a situation of conflict of interest by putting his brother's association forward; he is also committing an offence of favoritism by trying to disqualify 'competing' associations. You are complicit in the offences committed by the prime minister. In addition, his invitation can be seen as an attempt at active bribery, putting additional pressure on you to choose his brother's association at the end of your consultation. By accepting this invitation, you are committing the offence of passive bribery.

BEST PRACTICE Choose your partners based on their skills and other objective criteria and document your choice. Do not give in to pressure from public authorities. Ask your Senior Manager to intervene. Inform the Legal & Compliance Department.

◀ In the context of relations with private entities

To implement our projects, we often act in partnership with organizations such as associations, foundations, NGOs, etc.

These partnerships must be formalized by the preparation and signature of an agreement detailing the terms and purposes of the partnership.

We must remain strictly independent and comply with our rules and values in all cases. The Mérieux Foundation's contributions (in cash or in kind), as well as its corporate name "Mérieux Foundation", must not be used for commercial purposes or taken out of the context or purpose of the partnership.



Any failings observed among our private partners (conduct contrary to probity, discrimination, child labor, etc.) must be reported immediately by any means:

→ **anonymously via the Whispli platform or**



→ **to the Legal & Compliance Department: compliance@fondation-merieux.org**

We must ensure that our private partners adhere to our ethical rules and operate in accordance with these rules.

INTERACTIONS WITH OUR SUPPLIERS AND OUR SERVICE PROVIDERS

We aim to work with suppliers and service providers who share our ethical beliefs. We expect them to subscribe to our values of prevention and ethics as well as respect for the law. To this end, the Foundation has developed a supplier evaluation procedure and a screening tool for third parties.

Employees must respect:

- The Evaluation procedure for third parties;
- The Contracts procedure for requesting a contract with a supplier, where required under the terms of the Contracts procedure;
- The Procurement procedure for placing the order then requesting payment of the supplier's invoice.

◀ Selection of suppliers

When considering contracting out a service to a third party or purchasing materials from a supplier, employees must always ensure there is

competition between suppliers who can provide the goods or service, in accordance with the rules of the procurement procedure (of the Foundation or the funder).

◀ Signing contracts

Employees must refer to the Legal Department in all cases provided for in the Contracts procedure.

◀ Purchase orders and payment for services

Employees must respect their authorization thresholds and approval channels.

Under no circumstances may project managers or any other employees split an order into several orders or stagger an order with the sole aim of reducing the amount and thus falling below the authorization thresholds (whether by means of several separate estimates or by means of successive invoices).



The Administration and Finance Managers in each office and the Financial Affairs Division ensure that these rules are respected.

We must ensure that our projects meet the highest standards of quality – for ourselves, our funders and our beneficiaries.

◀ Control of the execution of services and receipt of services

We must ensure that our projects meet the highest standards of quality – for ourselves, our funders and our beneficiaries.

The products and services ordered must be checked on delivery. Confirmation of receipt of purchases is required before payment of the balance.

The employees in charge of receiving an order must ensure that the order is complete and of the expected quality.

Please remember that the receipt of services must be carried out in compliance with the rules set out in the purchasing procedure.

Receipt constitutes acceptance by the signatory, on behalf of the Mérieux Foundation, of the existence and quality of the service or products delivered.

How to identify risks?

Case n°1

You have been approached by a new equipment supplier. He suggested that you replace your quarterly orders from your usual supplier with a single annual order to cut your costs by two thirds! A colleague told you that this supplier has a very bad reputation. You decide nevertheless to take advantage of this opportunity so that you still have a budget left for other items. You sign a contract to seal this attractive deal.

RISK You did not put this supply contract out to tender and only took price into account when making your choice. You also signed a contract without asking the Legal Department and without informing them of the possible bad reputation of this new supplier.

BEST PRACTICE Inform the Legal Department of this supplier's poor reputation so that they can carry out due diligence on the supplier. If the Legal & Compliance Department tells you that the supplier does not present any particular risk, organize a call to tender with other suppliers. You must then follow the procedure for validating contracts and the authorization thresholds for signing contracts.

Case n°2


The Foundation is in charge of organizing training for laboratory staff as part of a project in a new country. Our only contact, a civil servant in the Ministry of Health, recommends a company that offers quality training. You ask this company for a quote and your contact thanks you for the order you are going to place. You find out that he is a shareholder in this company.

RISK by placing the order, you become an accomplice in the unlawful taking of interest. Depending on the nature of the thanks you are given, you may also be at risk of passive bribery.

BEST PRACTICE Make every effort to obtain quotes from several suppliers. If only one supplier exists, document this fact. If you have any doubts about a conflict of interest, alert your Senior management. Only accept gifts and invitations within the limits of the Gifts procedure.

INTERACTIONS WITH OUR INTERMEDIARIES

The Mérieux Foundation may use the services of intermediaries. For the purposes of this Code, intermediaries are natural or legal persons who are entrusted with the task of acting on behalf of the Foundation to obtain administrative authorizations, formalities, customs clearances, and licenses.

 Our service providers and consultants sometimes play the role of intermediary themselves as part of their tasks, but in some cases this role is entrusted to separate persons by way of a mandate (express or tacit).

We must carefully document the services provided to the Foundation by intermediaries such as consultants, advisors or service providers. Intermediaries commissioned by us must expressly undertake to exclude any bribery, granting of unfair advantages or any other unethical act. Any remuneration paid to intermediaries must be related to the services provided and must be documented.

Any remuneration for services which may be thought to be used to finance bribes or which have no real result is prohibited.

The remuneration of these third parties must be carefully defined to correspond perfectly to the services rendered and must be duly recorded in our accounting books.

Best practices

- Any use of intermediaries must be communicated in advance to the Legal & Compliance Department by e-mail at this address:
→ legal@fondation-merieux.org
- Relationships with intermediaries should be formalized through contracts and documented.
- In the event of any doubt about the actual activity of the intermediary, an alert should be sent to the Legal & Compliance Department:
→ by e-mail at this address:
compliance@fondation-merieux.org
- or by using the Whispli alert system



INTERACTIONS WITH
OUR BENEFICIARIES

The Foundation acts for the benefit of fragile populations in countries where the situation may be precarious in terms of security and safety, respect for human rights, in particular women's and children's rights, and the fight against terrorism and criminal organizations of all kinds.

We must therefore be particularly careful to ensure that our ethical and compliance principles are respected in these territories.

Employees involved in projects with an international dimension must act in accordance with the laws, regulations and restrictions that apply to imports, exports, boycotts and embargoes.

Beneficiaries' reports on the use of funds paid by the Mérieux Foundation for the project and, if necessary, the exercise of our right to audit, make it possible to ensure the proper use of the funds allocated.



If you have any doubts about the feasibility of a project in a particular territory, in view of these principles, you can contact the Finance Department and the Legal & Compliance Department.

We must be particularly careful to ensure that our ethical and compliance principles are respected in these territories.

How to identify risks?



Case n°1

The Foundation provides a grant of €100,000 to a beneficiary to carry out a project. At the end of the project, the financial reports indicate and justify the use of €80,000.

RISK The surplus of €20,000 might have been used for purposes outside the project.

BEST PRACTICE In conjunction with the Finance Department and the Legal & Compliance Department, conduct an audit on the beneficiary's use of the grant and, if necessary, request the reimbursement of the balance.



Case n°2

At the inauguration of a laboratory, the Foundation's delegation noted the absence of certain equipment, even though it had been financed. The activity report states that all equipment has been installed.

RISK Missing equipment may have been resold or diverted from its intended purpose. The veracity of their purchase is also questionable. This situation presents a risk of misappropriation of funds, financing of illegal activities, fraud, bribery, etc.

BEST PRACTICE In conjunction with the Finance Department and the Legal & Compliance Department, conduct an audit on the beneficiary's use of the grant. The appropriate measures will be determined with the Legal & Compliance Department.



We have established a framework to be respected so that we can ensure our projects and activities are as safe and secure as possible, and limit the risks outlined before.

For each of the risks described (bribery, unlawful taking of interest, favouritism, influence peddling , conflicts of interest or other breaches of probity), the following rules can significantly reduce the impacts and potential liabilities incurred and are a guarantee of our commitment to comply with legislation and ethics in all our actions.

Respect for these rules is our best means of risk prevention and potentially our best means of defense.

3.

HOW WE COMPLY WITH THE RULES

↘ Fundings

INWARD FUNDING

The Foundation may receive various kinds of funding to finance its activities.

◀ SPONSORSHIP RECEIVED

For the purposes of this Code, sponsorship received is defined as financial support for an event organized by the Foundation granted by commercial entities or pharmaceutical laboratories with a view to obtaining an advantage (such as visibility or an invitation to the sponsored event).

It can only be accepted if the sponsor does not demand any disproportionate consideration from the Foundation, which is the beneficiary.

We may grant the sponsor an offer of visibility at the sponsored event, but we may not allow any intervention or influence over the content of the event. Under no circumstances may the sponsorship have the purpose, even if not exclusive, of obtaining connections or confidential information from the beneficiary, such as the list of participants in the event, the list of other sponsors or partners, etc.



Best practices

All sponsorship activities must be formally authorized in advance by executive management. No employee may make any commitment on behalf of the Foundation without such prior authorization.

Sponsorships received must be subject to a prior agreement, which must be drawn up with the Legal & Compliance Department, in accordance with the procedure for validating contracts.

◀ DONATIONS RECEIVED

For the purposes of this Code, donations received relate to material, financial or technical support granted to the Foundation by a disinterested third party.

◀ GRANT ALLOCATION

For the purposes of this Code, donations relate to material, financial or technical support granted by the Foundation, without any direct or indirect compensation on the part of the beneficiary, to a person or organization for the exercise of activities in the public interest.

Donations and sponsorship allocated as part of the Foundation's corporate purpose contribute towards the funding of causes in the public interest. Nevertheless, they may present a risk of corruption if they are used to finance organizations in which representatives or relatives of governments or decision-makers have an interest, or if these organizations are fictitious and are used to conceal a form of corruption.

Donations of materials, equipment, buildings, and funding allocations must be formally authorized in advance by executive management. No employee may make any commitment on behalf of the Foundation without such prior authorization.

Outside this framework, it is strictly forbidden for any employee to make any donation in kind or in cash on behalf of the Foundation. Any employee who, in a private and personal capacity, makes any donation to a political party or governmental organization is prohibited from making any reference to a link with the Foundation.

The donation does not imply any direct or indirect compensation on the part of the Foundation. The donation may not be used as a means of accrediting the image of the sponsor by binding the Foundation's image to its own, nor as a lever for obtaining any direct or indirect benefit.



Best practices

The Secretary General of the Foundation must be informed of all planned donations to the Foundation.

Donations received must be subject to a prior agreement, which must be drawn up with the Legal & Compliance Department and the Financial Affairs Department.

OUTWARD FUNDING

As part of its activities, the Foundation may finance certain actions or projects through different ways.



Donations and funding must be subject to a prior agreement, which must be communicated to the Legal & Compliance Department by e-mail at this address:

→ legal@fondation-merieux.org so that they can ensure its traceability.

◀ SPONSORSHIP

For the purposes of this Code, sponsorship relates to material, financial or technical support provided by the Foundation (the sponsor) to an event, person, organization, or product. The Foundation's image is therefore associated with the sponsorship operation.

Sponsorship operations are therefore the sole responsibility of executive management, and no other employee should undertake such actions.

To be valid, sponsorship must be a support and a vehicle for the integration of the Foundation into local health policies or support for vulnerable populations.

On the other hand, sponsorship cannot be used for political gain of any kind by local authorities. Similarly, sponsorship may not be used to impose service providers or other constraints of any kind.



Any suspicion of any kind whatsoever must be reported to the Legal & Compliance Department by e-mail at this address:

→ compliance@fondation-merieux.org so that the traceability of the measures taken in response to the detected risk can be ensured.

Sponsorship must be subject to a prior agreement, which must be communicated to the Legal & Compliance Department by e-mail at this address:

→ legal@fondation-merieux.org so that they can ensure its traceability.



Lobbying

By definition, lobbying is a strategy to promote certain ideas and interests to decision-makers. The action therefore aims to influence or generate changes that depend on the decision-makers concerned.

Lobbying is regulated by a number of provisions, particularly in France, where the High Authority for Transparency in Public Life has introduced registers and control, and in Europe. Certain international authorities such as Transparency International also have their own initiatives.

Your actions could fall within the scope of these laws and controls. In addition, lobbying could be considered to be influence peddling if it is not exercised within the mandatory legislative and regulatory framework. Consequently, lobbying actions are the sole responsibility of executive management, and no other employee should engage in lobbying actions or take initiatives in this respect without having been expressly authorized by executive management beforehand. Executive management may then define the purpose, conditions and limits that must be respected.

No employee should engage in lobbying actions or take initiatives in this respect without having been expressly authorized by executive management beforehand.

↘ Gifts and invitations

GIFTS AND INVITATIONS RECEIVED


↳ GIFTS

Gifts are benefits of any kind, given by someone as a sign of gratitude or friendship, without expecting anything in return.

These gifts may therefore help to maintain good relations, but they should not be considered as a means of influencing a decision and in particular of favoring a company or a public or private person.

The gifts must be of reasonable value and adapted to the circumstances and the nationality of the person offering the gift, up to the limit fixed in the Gifts and Invitations procedure.

If possible, the gift should be used with the members of the department concerned. If it is a material gift, it must be kept on the Foundation's premises.

 *Under no circumstances should the acceptance of a gift be such as to cast doubt on the honesty of the funder or the impartiality of the recipient. In all circumstances, gifts must be declared and recorded in a register kept by Legal & Compliance Department.*

↳ INVITATIONS & ACTS OF COURTESY

The invitation is a public relations operation and has the sole purpose of sharing a pleasant professional experience or event with the beneficiary. It should therefore remain purely professional and may not involve any member of the family or non-professional circle. The act of receiving a gift or invitation may look like or be perceived as a corrupt act, or it may raise doubts about subsequent impartiality and independence.

Invitations to restaurants, accommodation, entertainment, or even an upgrade in transport or accommodation, are considered as act of courtesy.

Great care should be taken to ensure that acts of courtesy do not create a conflict of interest or compel any return or favor or compromise the impartial and independent exercise of a function.

The invitation is a public relations operation, (...) it should therefore remain purely professional and may not involve any member of the family or non-professional circle.

GIFTS AND INVITATIONS OFFERED

In view of the legislation and the prudence that we must maintain in all our relations, and to ensure that our behavior is not misinterpreted, we must act with restraint and discernment to avoid having any influence on decision making. To exclude any kind of influence, we must adhere to the following rules:


- Gifts may be given to a supplier, a beneficiary or any current or potential partner according to the limitations set in the Gifts and Invitations procedure.
- Invitations to events or meals are subject to the same rules.

Benefits granted in the form of gifts or invitations exceeding the amounts set in the procedure must be authorized in advance by the executive management and the Legal & Compliance Department.

- In the same way, we respect the requirements and policies of our beneficiaries, funders or prescribing practitioners and our suppliers in this respect.
- Gifts and invitations must be sent exclusively via the respective addresses of the entities and in no case from or to the homes of natural persons.

→ No donations, whether in the form of cash, vouchers, or bank transfers, can be accepted.

We must not, directly or indirectly, offer a benefit including a gift, entertainment or travel to a beneficiary (or potential beneficiary) or government official with the intention of influencing a decision in any way, or in circumstances that could be perceived as influencing a decision. Many national laws restrict or prohibit the giving of meals, receptions or gifts to clients or government officials.

 Don't forget that appearances matter. Any gesture of thanks can be seen as undue remuneration, regardless of your real intention. We must avoid at all costs anything that could be construed as bribery or influence.



- **Comply with applicable laws and the managing Gifts and Invitations procedure regarding interactions with governments and medical providers.**
- **Refuse to participate in or allow any favors or indulgences of any kind.**
- **Ensure that our third parties are aware of our ethical principles on bribery, and that they comply with them.**
- **Inform the Legal & Compliance Department by e-mail at this address: compliance@fondation-merieux.org if you suspect any form of corruption.**

◀ **FACILITATION PAYMENTS**

Facilitation payments consisting of unofficial payments to public or private officials for the purpose of facilitating, obtaining or expediting the performance of administrative formalities are not allowed. Facilitation payments are considered to be bribery in many countries.

EXAMPLE *The granting of a permit, license, authorization, public or private order.*

In the event of a request from a public official, you must politely refuse, explaining that international rules and French law prohibit such practices. You should also inform your Senior management and the Legal & Compliance Department about the request or report it anonymously via Whispli. →



How to identify risks?



You are having trouble obtaining permission from the local authorities. The partner you work with has introduced you to a local contact who is used to solving this kind of problem. He has to travel, so he asks you to pay for his travel expenses. You organize his travel and charge the costs to your expense account.

RISK You are granting an advantage to obtain the expected decision more rapidly. Some laws consider this practice to constitute bribery.

BEST PRACTICE Ask your line manager to intervene with the manager of your reluctant contact person.

Compliance with the rules of the purchasing procedure

Where purchases can be made by mutual agreement, the purchasing procedure must be strictly followed.

Two rules are particularly effective in terms of the risk of breaching probity: respecting authorizations to place orders according to their nature or amount, and prior authorizations together with the procedures for issuing calls to tender according to the nature or amount.

No restriction of competition. discriminatory practices or practices aimed at imposing exorbitant conditions through the Foundation's strong position in the contractual relationship will be tolerated.

Careful attention should also be paid to the rules for receiving the item ordered, depending on authorizations and contractual clauses. The person who receives the order (service, product, etc.) must validate the quality and quantity, which involves making a commitment on behalf of the Foundation.

We do not tolerate restriction of competition, discriminatory practices or practices aimed at imposing exorbitant conditions through the Foundation's strong position in the contractual relationship.

How to identify risks?

Case n°1

You always work with the same provider. You renew their contract every year for a budget of €10,000 per year. It's a bit more expensive, but you get on well with them. They regularly invite you out to lunch.

RISK You are not respecting the purchasing procedure and you are not asking for quotes from different providers. Your choice is not based on objective criteria. Moreover, by accepting their regular lunch invitations, you are putting yourself in a situation of passive bribery.

BEST PRACTICE You should ask for three quotes from three different service providers and make your choice based on objective criteria. You should not accept an invitation to lunch from a provider during the tendering process if this provider is responding to your call for tender.

Case n°2

During your last tender process, you selected the cheapest company. You were not satisfied with them as they did not respect the schedule or the budget. You therefore decided to split the work for your new project and place three separate orders so that you would be beneath the threshold requiring approval.

RISK You are not following the rules for placing orders.

BEST PRACTICE Consult at least three different companies for all the services you need, without splitting them up.

↘ Financial integrity and anti-money laundering

WHAT IS MONEY LAUNDERING?

Money laundering is the process consisting in concealing and disguising the nature and source of financial amounts derived from criminal activities (such as corruption, drug trafficking, pimping, arms sales, tax evasion, fraud, etc.) in order to reinvest them into legal economic channels.

As in most countries, money laundering is a punishable offence in France:

→ For natural persons: five years’ imprisonment with the possibility of pretrial detention, a fine of €750,000 or more (when the sums involved in the laundering exceed this amount, Article 324-3 of the Criminal Code authorizes a fine equal to half of the sums involved), confiscation of the convicted person's property, etc.

→ For legal entities such as the Mérieux Foundation: a fine of €3,750,000, as well as numerous additional penalties, such as dissolution or prohibition from business activity, exclusion from public contracts, etc., in addition to the impact on our reputation.

WHAT IS PROHIBITED?

- Facilitating the false justification of the origin of assets or income belonging to the perpetrator of a crime or offence from which this perpetrator has profited directly or indirectly is prohibited. Assistance may consist of supplying false accounting documents or invoices.
- Assisting in an operation to “clean dirty money” by helping to reinvest the direct or indirect proceeds of a crime discreetly into the legal economy is prohibited.

WHAT DOES THIS HAVE TO DO WITH THE MÉRIEUX FOUNDATION? AND WHAT DOES THIS HAVE TO DO WITH ME?

- Before carrying out its projects, the Mérieux Foundation receives funding from external funders. This funding must not be derived from illegal activities.
- To carry out its missions and projects, the Foundation must pay out funds or give goods to beneficiaries for a specific use. Funds paid and goods donated must not be diverted from their intended purpose.

PLEASE NOTE

- The perpetrator of the money laundering offence does not carry out the transactions himself, he or she merely assists. This is a form of complicity that has been made an offence in its own right.
- The fact that the person assisting did not make a personal profit from the transaction is irrelevant.



Best practices

Employees of the Mérieux Foundation, particularly those in contact with beneficiaries, must be vigilant about the use of the funds paid and the goods donated and report any doubts they may have.

Employees of the Mérieux Foundation, particularly those in contact with private or institutional funders, must be vigilant as to the origin of funds received and report any doubts they may have by informing the Legal & Compliance Department or by using the Whispli platform.



The criminal penalties for simple money laundering are very severe, for both natural and legal persons.

We must ensure that our donations in cash or kind, such as the installations/products/machinery we deliver, are not diverted from their purpose and use.

We must maintain a maximum level of vigilance, because the risk of money laundering and/or funding terrorism is very high.

We need to ensure that our financial transactions are properly recorded in accordance with applicable accounting standards. We have financial policies and procedures in place to comply with these standards, as well as with legislation and regulations.

The Foundation prohibits any participation in money laundering operations.



If any irregularity is detected in the funds received, or in the destination of the funds or goods donated, this should be reported internally to executive management and to the Legal & Compliance Department by e-mail at this address:

→ *compliance@fondation-merieux.org who will lead an investigation.*



Main points to remember

- **The identity of funders must be known; the use of shell companies must immediately put employees in charge of relations with funders on alert and be reported to the Legal & Compliance Department by email at compliance@fondation-merieux.org**
- **Incoming financial flows ("inward funding") must be validated in writing by senior management and governed by agreements signed as part of the contract approval procedure.**
- **The identity of the beneficiaries of our funding and donations of equipment and other materials must be known precisely.**
- **Outgoing financial flows ("outward funding") and donations of equipment must be approved in writing by executive management and governed by agreements signed as part of the contract approval procedure.**
- **The creation of suppliers is carried out in accordance with the procedures in force, under the responsibility of the Financial Affairs Department.**
- **Any modification of a supplier's bank details is the responsibility of the Financial Affairs Department and must be strictly and automatically controlled from the top.**



Confidentiality

We are committed to preserving the confidentiality of information about the Foundation's activities and practices, as well as the data of third parties, partners, beneficiaries, funders, contractors, or suppliers. Information, confidential documents, and professional knowledge must not be passed on to third parties under any circumstances.

In this context, the security requirements for the classification and handling of all information (public, commercial, confidential, secret) must be strictly observed. The regulations for guaranteeing professional confidentiality remain valid even after termination of the employment contract.



Any discussion or contact with a third party that may involve the communication of confidential information must be the subject of a confidentiality agreement drawn up with the Legal & Compliance Department.

↘ Appropriate use of the IT system

The Foundation's IT system is essential for our daily activities and contains confidential data; its protection is of paramount importance to all.

Each user of our system must be aware of the best practices set out in the IT Charter and must have read the Foundation's Information Systems Security Policy (ISSP) in order to contribute actively to its security.



Each user is obliged to report any attempted violation of their account and, in general, any anomaly they may observe to the IT Department at this address:

→ it@fondation-merieux.org

Each user of our system must be aware of the best practices set out in the IT Charter and the ISSP.



Main points to remember

- Do not use any account other than your own.
- Keep access codes to our IT system safe, including passwords and badges, and never share them with anyone.
- Only connect the Foundation's own computer equipment to the Foundation's network, unless otherwise agreed by the IT department or using previously authorized remote connections.
- Do not introduce pirated or unapproved software into the Foundation's IT system.
- Only send or store confidential information outside the Foundation's network in a manner that complies with the confidentiality rules.
- Never use the Foundation's IT system to acquire or transmit information or documents contrary to local laws and regulations.
- Never lend your laptop to unauthorized user(s) nor let it be used in your absence and without your control.



One of the pillars of the anti-corruption approach is risk management. In this context, the AFA* mentions risk detection as an important component of the approach, which is materialized by the internal control and audit systems.

**The French Anti-corruption Agency
(Agence française anticorruption)*

4.

CORRECT APPLICATION OF THE RULES

↘ Internal control (accounting and financial)

An internal control system must be in place to ensure compliance with the rules relating to probity.

This system must make it possible to assess the effectiveness of the risk prevention methods, as well as employees' respect for the application of the rules defined in this Code of Conduct.

In particular, internal control may cover:

- Compliance with authorization levels;
- Compliance with commitment limits and permits;
- Evaluation of the acceptance procedure for ordered/purchased services, products and equipment;
- Respect for the terms of contracts;
- Fulfillment of the selection process for service providers and suppliers;
- Use of funds received (inward funding);

- Use of allocated funds (outward funding);
- Evaluation of internal control processes.

An internal control system must be in place to ensure compliance with the rules relating to probity.

↘ Audit of partners, service providers and beneficiaries

The Foundation's right to audit should apply to all third parties with whom it carries out its projects.

The right to audit, when implemented, allows the verification of:

- The origin of the funds or goods received (combating money laundering);

- The use of funds;

- The final destination of donated funds and goods (combating the misappropriation of funds and the financing of illicit activities).

The right to audit is provided for in our contracts with our funders, partners, service providers or in the general terms and conditions of the service providers or suppliers.



- The creation of suppliers, partners and service providers is carried out in accordance with the procedures in force. This may only be authorized by the Financial Affairs Department.
- Any modification of a supplier's or service provider's bank details is the responsibility of the Financial Affairs Department and must be strictly and automatically controlled from the top.
- Strict control of authorizations and access rights is in force.
- Report any irregularity to the Financial Affairs Department at this address: comptabilite@fondation-merieux.org



The Foundation is committed to several international laws and conventions, including the 1948 Universal Declaration of Human Rights and the 2011 United Nations Guiding Principles on Business and Human Rights. Since 2003, the Foundation has ratified the United Nations Global Compact, the world's largest corporate sustainability initiative, which encourages companies to align their strategies and operations with universal principles relating to human rights, labor, the environment, and anti-corruption.

Furthermore, we are committed to respecting the core conventions of the International Labor Organization and their provisions to ban child and forced labor, to respect freedom of association, to promote diversity and to ensure respect for women's rights, the right of peoples to freely dispose of their natural resources and the right to health.

5.

FUNDAMENTAL STANDARDS

HEALTH AND SAFETY AT WORK

All of us have the right to a safe and healthy working environment. Each employee must take reasonable precautions to prevent personal injury. To do this, they must comply with health, safety and environmental requirements and must report to their line manager if they notice that their workplace is not safe.

USE OF ILLEGAL SUBSTANCES

All employees shall refrain from using any substances whose use, misuse and/or abuse could affect their judgment. Employees must also comply with local regulations on the handling and storage of such substances to prevent their diversion for illegal purposes.

PROHIBITION OF VIOLENCE IN THE WORKPLACE

The safety of employees is a clear priority for us. The Foundation strictly prohibits the use of threats or violence against any employee or partner of the Foundation. Any act or threat of violence in the workplace, by or against an employee, is strictly prohibited.

Under no circumstances should employees bring weapons or any other potentially dangerous objects or products into the workplace.



Compliance with fundamental standards

DIVERSITY, NON-DISCRIMINATION, AND HARASSMENT

The Foundation is committed to the same recruitment and career management practices for all individuals, considering only the required qualifications and behavioral competencies for the performance of their duties. Respect for diversity implies, among other things, making reasonable accommodations to help employees with specific needs (disability, special situation, etc.).

The Foundation prohibits any discrimination against an employee based on any of the following criteria:

Gender – morals – sexual orientation – gender identity (the gender with which a person identifies, whether or not it corresponds to the sex indicated in the civil registry) – age – family situation or pregnancy



- Make sure your actions, words, or omissions do not present a danger to yourself or others.
- Be familiar with and follow the laws and procedures in areas subject to safety and environmental regulations.
- Try to listen to your colleagues and be aware of any noticeable change in behavior (specific situations of stress or anxiety). Report them to your manager if you are concerned about them.
- Report immediately any unsafe working conditions and any threats to health, safety or the environment to the Human Resources Department:
- by email: ressources.humaines@fondation-merieux.org
- anonymously via Whispli.
- You can also report anonymously any act or threat of violence, any unusual situation or any situation that seems abnormal to you via the Whispli platform.



– genetic characteristics – membership or non-membership, real or assumed, of an ethnic group, nation, alleged race or specific religion – political opinions – trade union or cooperative activities – the exercise of an elective mandate – religious beliefs – physical appearance – surname – place of residence or bank account – state of health or disability – particular vulnerability resulting from the economic situation of the person concerned, apparent or known to the author of the decision – loss of autonomy – ability to express oneself in a language other than French – bank account information.

All aspects of the employment relationship, such as recruitment, work assignments, promotions, remuneration, discipline and termination of the employment contract, are carried out without taking these characteristics into account. Similarly, the Foundation prohibits any discrimination against the beneficiaries of the Foundation's projects.

The Foundation is committed to providing a working environment free from any form of harassment. In particular, the Foundation prohibits all forms of harassment and bullying, whether verbal, physical or sexual, including unwanted sexual advances, requests for sexual favors, sexist behavior and any physical or verbal conduct that discriminates against women.

No form of harassment may be exercised by an employee against other employees, the beneficiaries of the Foundation's projects, partners, or any other people the Foundation deals with. No

staff member is allowed to enter into a relationship with a beneficiary that could be based on exploitation of the beneficiary's vulnerability

EXAMPLE Sexual advances by a beneficiary in exchange for favors from a staff member.

The Foundation has a zero-tolerance policy when it comes to physical and sexual abuse and exploitation.



- Do not show any discriminatory attitude or exercise any form of harassment towards any person, whether they are employees, partners, or beneficiaries of the Foundation's activities.
- Do not engage in or tolerate any discriminatory behavior.

FORCED LABOR, CHILD PROTECTION, STANDARDS AND PRINCIPLES OF DEVELOPMENT AID

As a signatory of the United Nations Global Compact since 2003, the Foundation is committed to promoting and respecting international human rights law.

As part of its commitment, the Foundation ensures compliance with international labor standards, including the prohibition of all forms of forced or compulsory labor, child labor and exploitation and all forms of discrimination. The Foundation complies with the laws on the prohibition of slavery, trafficking and smuggling of human beings. The Foundation ensures that none of its partners, providers, funders, or beneficiaries acts in a way that is inconsistent with these principles and international standards.

The Foundation complies with provisions for child protection. Having adopted its own [internal child protection policy](#) in January 2020, the Foundation and all its employees are committed to respecting and highlighting the seven principles of its policy:

- Do not engage in any form of harassment or bullying, whether verbal, physical or sexual.
- No project or transaction of the Foundation can be linked to sexual favors.
- Do not threaten or use violence against any person, whether they are an employee, partner or beneficiary.
- Report immediately to the Human Resources Department (ressources.humaines@fondation-merieux.org) any discrimination, any form of harassment, any unusual situation or any situation that seems abnormal to you.
- You can also report anonymously any discrimination, any form of harassment, any unusual situation or any situation that seems abnormal to you via the Whispli platform.

Principle 1**Zero tolerance of any act of child exploitation and abuse**

- The Foundation prohibits all acts and behavior of child exploitation and abuse, including sexual abuse or exploitation, sexual violence, any act of physical or verbal violence against children, armed violence, child trafficking and smuggling, forced child labor, gender-based violence, forced and child marriage, corporal punishment, child pornography, or any other form of abusive, violent, and exploitative practice.

Principle 2**Preserving the best interests of the child**

- In all the Foundation's activities, the best interests of children are taken into account and children's interests take precedence over all other considerations.

Principle 3**Analysis and reduction of risks**

- The Foundation ensures the prior analysis and prevention of any risk of harm to children during its activities.

Principle 4**Respect for confidentiality**

- The Foundation complies with the protection of information about beneficiaries who are minors. No information about a minor will be disclosed unless it is in the best interest of the child, and in accordance with the principles of confidentiality (sharing of information strictly necessary for the performance of the activity).

Principle 5**Responsibility**

- The Foundation is committed to promoting a working environment that excludes any form of abuse, exploitation or violence against children, and ensures that mechanisms are in place to prevent such acts.

Principle 6**Procedural fairness**

- The Foundation respects the principle of procedural fairness in its internal procedures.
- The principle of procedural fairness requires that any decision must protect the rights and interests of all persons, including those of children.

Principle 7**Duty of care and shared responsibility**

- The Foundation believes that everyone has an obligation to protect children from all forms of abuse, violence and exploitation, and to make decisions in the children's best interests.
- In accordance with this principle, all employees and partners of the Foundation undertake not to engage in any activity that may be harmful to children, intentionally or otherwise.

As a member of the [CHS Alliance](#), the Foundation is committed to carrying out all activities and actions in accordance with Core Humanitarian Standards (CHS).

The Foundation and its staff are committed to carrying out their work in accordance with the following nine standards:

Standard 1

Humanitarian response and development aid are appropriate and relevant.

Standard 2

Humanitarian response and development aid are effective and timely.

Standard 3

Humanitarian response and development aid strengthen local capacities and avoid negative effects.

Standard 4

Humanitarian response and development aid are based on communication, participation and feedback.

Standard 5

Complaints are welcomed and addressed.

Standard 6

Humanitarian response and development aid are coordinated and complementary.

Standard 7

Humanitarian and development actors continuously learn and improve.

Standard 8


The Foundation's staff are supported to do their job effectively and are treated fairly and equitably.

Standard 9

Resources are managed and used responsibly for their intended purpose.

The Foundation thus ensures that its development aid work is carried out in accordance with the humanitarian and development aid principles of impartiality, neutrality, independence and humanity.



- Ensure compliance with the international and national standards set out in labor law.
 - Support and encourage the Foundation's commitment to inclusion, diversity, and the respect of basic rights and human rights.
 - Do not show any discriminatory attitude or exercise any form of harassment towards any person, whether they are employees, partners or beneficiaries of the Foundation's activities.
 - Do not threaten or use violence against any person, whether they are an employee, partner or beneficiary.
 - Ensure compliance with child protection and be vigilant about compliance with the principles of the Foundation's internal child protection policy.
- Ensure that you carry out your duties in accordance with the standards and principles of development aid and humanitarian action.
 - Report to the Legal & Compliance Department any form of behavior that contravenes the principles, rules of conduct and international standards to which the Foundation is committed to:
 - *by email: compliance@fondation-merieux.org*
 - *anonymously via the Whispli platform.*
- 



Conception : Alteriade • Pictures : Fondation Mérieux

Notes



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