



Code of Ethics

Providers/stakeholders

The INTER MUTUELLES ASSISTANCE Group is mandated by its members and customers to implement guarantees or services which their beneficiaries may claim under their contract of insurance (assistance), services or asset management.

Within this context, the purpose of this charter is to create a dynamic establishing a common desire (between the Inter Mutuelles Assistance Group and its network of providers/stakeholders) to provide services for beneficiaries, in compliance with national, European and international regulations, as well as with respect for the rules of professional ethics.

Manpower

The IMA Group undertakes to comply with labour law regulations.

Therefore, IMA Group requires providers/stakeholders to adhere to the following principles:

- **Compliance with labour law**

Providers/stakeholders agree to comply with the normative and regulatory framework relating to labour law. They must not, under any circumstances, resort to undeclared or illegal labour.

Providers/stakeholders ensure that their own business partners (e.g. subcontractors when authorised) comply with the regulations in force.

Providers/stakeholders must provide the IMA Group with all documents providing proof of compliance with this obligation (in particular vigilance certificates or the commitment not to use illegal labour).

- **Seconded worker**

Providers/stakeholders must provide the IMA Group with all documents demonstrating that they have legally declared the use of seconded employees to the competent authorities.



- **Subcontracting use**

Providers/stakeholders must inform the IMA Group of any use of subcontracting and demonstrate that they have complied with their reporting obligations (obligations described in the service agreement). When authorised, providers/stakeholders must ensure that their own subcontractors comply with the regulations in force.

- **Prohibition of the use of child labour**

Providers/stakeholders agree not to use child labour (principles of the Global Pact drawn up by the International Labour Organization).

Health and safety

The IMA Group is committed to improving the protection of its employees' health and safety in all of its activities.

The IMA Group requires providers/stakeholders to comply with laws, regulations and standards in health and safety. Therefore, they must ensure that their activities do not endanger the health and safety of their staff and the surrounding population.

Environment

The IMA Group has adopted a CSR approach in order to comply with environmental laws and regulations, to continuously improve and limit the negative impact of its activities on the environment.

The IMA Group requires providers/stakeholders to comply with all environmental laws, regulations and standards. When authorised, providers/stakeholders must ensure that their own subcontractors also comply with the regulations in force.


Business ethics, the fight against corruption, conflict of interest and fraud

The IMA Group promotes integrity and business ethics in all aspects of its activities and undertakes to comply with all legal and regulatory measures, particularly with regard to corruption.

To this end, the IMA Group has integrated into its policies and procedures, the guidelines of the Sapin II law of 9 December 2016 on transparency, anti-corruption and modernisation of economic life.

Given its activities, international dimension and the different nationalities that compose it, the IMA Group has defined the common base of rules intended to prevent breaches of the Sapin II law throughout its production chain, including at its French and foreign providers/stakeholders.

In addition, the IMA Group is committed to being loyal and transparent in order to establish and maintain lasting relationships of trust with its partners. They must conduct their activities in accordance with the principles of honesty, fairness and the ban on corruption in commercial relations.



Providers/stakeholders must refrain from offering their contacts any money or benefit in kind that may influence business decisions.

In addition, providers/stakeholders must demonstrate the lawfulness of their activity as well as the authenticity of the documents providing proof of the legality of their activity, and comply with the internal audit system implemented by the IMA Group.

Privacy and data protection

The IMA Group undertakes to comply with the regulations concerning the protection of privacy of its insured customers/beneficiaries and providers/stakeholders.

The IMA Group provides providers/stakeholders with personal data of lawful origin and ensures that the data subjects are informed and their consent is obtained.

To this end, providers/stakeholders must implement all technical, physical and organisational measures to guarantee the privacy and protection of the data entrusted to them for the execution of their duties.

Providers/stakeholders agree not to use for purposes other than the provision of services, not to disclose and not to alter the personal data entrusted to them.

Personal data cannot be transferred free of charge or against payment.

Personal data must not be used for commercial purposes.

Ethics towards customers

Providers/stakeholders undertake to ensure compliance with the principles of integrity, impartiality, honesty, transparency, mutual aid towards insured customers/beneficiaries:

- Providers/stakeholders undertake to support customers, advise them faithfully and not to influence their decision-making or exercise undue influence,
- Providers/stakeholders must act without any form of discrimination, to provide human and material assistance and moral support.

Responsibilities

The IMA Group reserves the right to ensure that providers/stakeholders comply with the charter by means of self-assessment questionnaires, and any document-based or on-site audits.

Providers/stakeholders must ensure that their partners (their own providers, subcontractors) comply with the above principles.

Should the service provider/stakeholder find any breach of these principles (unethical behaviour, conflict of interest, etc.) in the exercise of its assistance tasks on behalf of the IMA Group, it may report



it by sending a declaration to the following address warning_deontology@ima.eu. The IMA Group undertakes to deal with this alert in the strictest confidence and in complete impartiality.