

COLISEE

**Vigilance plan**

# Introduction

## Context

Law no. 2017-399 of 27 March 2017 relating to the duty of vigilance of parent companies and contracting companies.

« Art. L. 225-102-4.-I.- Any company which, at the end of two consecutive financial years, employs at least five thousand employees in its own company and in its direct or indirect subsidiaries whose registered office is located in France, or at least ten thousand employees in its own company and in its direct or indirect subsidiaries whose registered office is located in France or abroad, shall draw up and effectively implement a vigilance plan.

Subsidiaries or controlled companies that exceed the thresholds mentioned in the first paragraph are deemed to comply with the obligations set out in this article as soon as the company that controls them, within the meaning of article L. 233-3, draws up and implements a vigilance plan relating to the activity of the company and of all the subsidiaries or companies that it controls.

The plan includes vigilance measures to identify risks and prevent serious violations of human rights and fundamental freedoms, health and safety of people and to the environment, resulting from the activities of the company and those of the companies it controls within the meaning of II of Article L. 233-16, directly or indirectly, as well as from the activities of subcontractors or suppliers with which it has an established commercial relationship, when these activities are linked to this relationship. The plan is intended to be drawn up in association with the company's stakeholders, where appropriate as part of multi-stakeholder initiatives within industries or at local level. It includes the following measures:

1. Risk mapping to identify, analyse and prioritise risks;
2. Procedures for regularly assessing the situation of subsidiaries, subcontractors and suppliers with whom we have an established commercial relationship, with regard to risk mapping;
3. Appropriate action to mitigate risks or prevent serious harm;
4. A mechanism for alerting and collecting reports on the existence or occurrence of risks, established in consultation with the trade unions representing the company;
5. A system for monitoring the measures implemented and evaluating their effectiveness. »

This vigilance plan provides an overview of current measures and identified areas for improvement. To illustrate the measures, we have chosen one or more best practices per subsidiary, without aiming to be exhaustive.

## Colisée

As a leader in elderly care in Europe, Colisée upholds an engaged and innovative vision of support for elderly people, based on listening to each individual and showing them respect. Colisée offers a complete and complementary range of services to meet the challenges posed by population ageing, including nursing homes, service flats, rehabilitation clinics and home care services. By fostering a people-centered approach, Colisée delivers an inspiring response to the complex challenge of ageing. Colisée became a mission-led company in March 2021, with the purpose: "Fostering positive ageing to drive society forward".

## Key figures (2022)

- 371 facilities
- More than 55,000 elderly people cared for
- More than 20,400 employees

## Perimeter

The vigilance plan assesses the existing risks for employees, clients and the company as a whole within the scope of the head offices, Colisée facilities, as well as in the supply chains linked to direct and indirect purchases. The vigilance plan reports on the actions implemented in the four main countries where Colisée operates: France, Belgium, Spain and Italy.

## Drawing up the vigilance plan

The following bodies contributed to the drafting of this document:

- Executive Committee
- ESG Department
- Medical Department
- Operational Control Department
- IT Department
- Human Resources Departments
- Legal Department
- Operational Departments
- Procurement departments

These bodies were involved from the definition of risks to the implementation of action plans.

# 1. Risk mapping

It is Colisée's responsibility to identify and minimise the impact of its activities on society. In 2022, Colisée updates the mapping of risks likely to occur within the perimeter of its head offices and facilities, towards its clients and employees. As part of the vigilance plan, an analysis of the challenges facing the sector helped to refine this assessment of social and environmental issues. The mapping of purchasing risks is distinct from that of the major risks of Colisée's activities, due to the specific nature of the methodologies used for each.

## Major risks associated with Colisée's activities

Issues	Risks	Description of the risk
<b>Human rights and fundamental freedoms</b>	Non-compliance with the eight fundamental conventions of the International Labour Organisation	Risk of non-compliance with the eight fundamental conventions of the International Labour Organisation: Freedom of Association and Protection of the Right to Organise Convention, Right to Organise and Collective Bargaining Convention, Forced Labour Convention, Abolition of Forced Labour Convention, Minimum Age Convention, Worst Forms of Child Labour Convention, Equal Remuneration Convention, Discrimination (Employment and Occupation) Convention, etc.
	Offense to clients' dignity	Risk of mistreatment of clients: violence, undernutrition, abuse of physical restraints, theft of personal belongings, discrimination, etc.
	Defects in the quality of care	Risk of accident and unexpected exit of a resident, risk of medication errors
	Professional risks	Health and safety risk linked to employees' working conditions: psychosocial risk and physical risk
	Shortage of medical staff	Risk of deterioration in quality of service and working conditions due to difficulties in recruiting and retaining medical staff
	Epidemics and pandemics	Risk of a new strain of Covid or the outbreak of epidemics/pandemics
<b>Health and safety</b>	Food contamination and water quality	Risk of food or water contamination affecting clients, employees and visitors
	Insecurity of facilities	Risk of damage to facilities, exposing the safety of clients, employees and visitors
	Violation of data confidentiality regulations	Risk of data privacy breach
	Cyber-attack	Risk of intrusion by third parties into infrastructures and systems, leading to: unavailability of IT services, disrupting operations; loss, theft or disclosure of personal data; risk of data corruption and ransom demands.
	Corruption	Risk that an employee or third party acting on behalf of a Colisée entity solicits or accepts bribes or other benefits in exchange for favours, risk that a stakeholder changes information in an inspection report.
<b>Environment</b>	Environmental impact of Colisée's activities	Risks to the environment generated by Colisée's activities: over-consumption of resources by buildings (energy, water), pollution (water, air, soil)

## **Purchasing risks**

The purchasing risk mapping identifies ESG issues relating to products and services purchased from Colisée's supply chains.

Colisée analyses the following purchasing categories: Energy, Utilities and equipment, Pharmaceuticals and medical procedures, Medical devices, Food and beverages, Linen and workwear, Cleaning, Water, Small supplies and furniture, Transport, Waste management, IT maintenance and services, Services and subcontracting.

Each purchasing category is analysed on the basis of the ISO 26 000 stakes:

- Human rights: civil and political rights, economic, social and cultural rights, fundamental labour rights
- Workers: working conditions and social security, labour relations and unionisation, health and safety in buildings
- Environment: pollution, sustainable use of resources, climate change, protecting biodiversity
- Communities: education and culture, job and wealth creation for the community, health promotion, social links
- Ethical practices: corruption, responsible political commitment, legal competition, property rights and patents

For example, the major risks identified for the Food and beverages category are as follows:

- Human rights: risk of child labour, risk of forced labour
- Workers: health and safety risk for farmers with the use of pesticides and chemical fertilisers, risk of non-compliance with fundamental ILO conventions, risk of undeclared work for seasonal workers, etc.
- Environment: risk of air, water and soil contamination, damage to biodiversity through the use of fertilisers, machinery and soil processing. Food processing and transport are also responsible for greenhouse gas emissions.

Actions to mitigate procurement-related risks are described in section 3.13 of this document.

## 2. Assessment procedures

To ensure compliance with regulations and ethical practices, Colisée carries out inspections in all facilities. These checks enable any malfunctions to be identified and action plans to be put in place accordingly. Inspections take several forms, as detailed below.

### Self-assessment by the facility

Self-assessments are carried out by the management committee of each facility, every six months. They cover Care, Human Resources, Building Safety, Food Safety and Maintenance & Hygiene. The results of these self-assessments, put in place in 2022, are reported to the Regional Director and the Operations Director. They trigger audits by the subsidiary's support departments if necessary.

### Specific audits by the subsidiary's regional support departments

For each of the topics below, the subsidiary's regional support departments carry out specific audits. The results are presented to site directors, regional directors and operations directors for action plan follow-up.

These audits are triggered by specific criteria (e.g. results of self-assessment, takeover of a facility, complaint or claim, satisfaction survey). An audit takes place at least once a year in each facility.

Themes	Examples of subjects audited
Care	Quality of care for residents and patients, Drugs circuit
Human Resources	Compliance with the Labour Code, Compliance with current regulations, Compliance with established contracts
Building security	Checking boilers and air conditioning systems, Maintenance and safety, Legionellosis' disease
Food safety	Catering quality, Surface treatment, Quantity of food, Hygiene of production tools
Maintenance & Hygiene	Quality of maintenance

### Internal controls by the Operational Control Director

Internal controls are carried out by Colisée's Operational Control Director, who reports to the President. 22 controls are carried out in the second half of 2022 in the French facilities. These controls are used to identify areas for operational improvement. In 2023, operational control visits are organised in the four countries where Colisée operates.

### Control by public authorities

In addition to internal inspections, public authority inspections are also carried out. In 2022, Colisée had 339 inspections (*see page 27 of the 2022 Mission Committee report*).

### Independent certifications

The Spanish and Italian subsidiaries are ISO 9001 certified. This standard defines the principles of quality management, on customer focus, management motivation and commitment, the process approach and continuous improvement.

### 3. Risk mitigation and prevention measures

Appropriate measures are put in place for each of the risks identified in the risk mapping.

In order to prevent some of the risks identified, Colisée commits to a Code of ethics, shared to all employees. It defines the fundamental rules and principles that subsidiaries, employees and stakeholders must respect in their professional relations. It applies to all Colisée employees, regardless of the nature of their collaboration (corporate officers, senior executives, temporary staff or third parties acting on behalf of Colisée).

Colisée's Code of ethics provides for the respect of fundamental principles in terms of social and environmental rights:

- Compliance with quality standards and vigilance procedures for residents
- Loyalty and integrity in professional relations
- Protection of personal data
- Employee dignity and well-being, prohibiting all forms of harassment and promoting diversity and inclusion
- Preserving Colisée's resources and the environment
- Provision of an alert mechanism

#### 3.1 Non-compliance with the eight Fundamental Conventions of the International Labour Organisation

In addition to the application of the Code of ethics by all employees, other actions have been taken within Colisée to ensure compliance with the Fundamental Conventions of the International Labour Organisation, in particular :

##### Guaranteeing trade union freedom

Trade union delegates and local representatives are present in all subsidiaries to ensure day-to-day social dialogue. In 2022, a special negotiation group, made up of twelve members of trade union delegations representing the four European countries where Colisée operates, defines the contours of the future European Works Council.

##### Ensuring that our practices comply with the Labour Code

Colisée is taking steps to ensure that its practices comply with the national Labour Codes.

In France, audits carried out by site directors and regional Human Resources managers ensure compliance. The Social Affairs department carries out communication and prevention initiatives on request of site directors, such as training in employment law.

##### Combating discrimination

Specific initiatives have been put in place by subsidiaries to combat all forms of discrimination. To ensure gender equality, Colisée measures the gender equality index in the four main countries where it operates (94, in 2022).

In France, since 2022, a partnership with MadeinTH has provided support for employees with disabilities. A communication line has been set up to help them with administrative formalities, such as applying for funding to adapt their workstations or dealing with AGEFIPH.

In Spain, an equality plan is drawn up and approved by employee representatives. This plan sets out the equality measures implemented in the areas of training, career development, pay, prevention of harassment, and health and safety at work. In addition to this equality plan, Colisée Spain collaborates with employment and integration associations, in particular for disability (Adecco Foundation, Red Cross, Novaterra), social exclusion (Novaterra, Accem, Red Cross, SEPE), youth (training centres) and refugees (YMCA).

##### 3.2 Offense to clients' dignity

In order to limit the risk of offending the dignity of clients, all employees are committed, through the Code of ethics, to complying with the quality standards and vigilance procedures put in place for residents. A complaints management process is in place to prevent risk situations (*see 4. Alert and complaints mechanisms*). Colisée also implements a variety of actions.

### **The personalised support plan**

The Personal Support Plan guarantees each resident attention and care adapted to their age, needs, wishes and pathology. It is drawn up with the resident, support staff and family in the month following the resident's entry into the facility and is updated at least every six months. In addition to guaranteeing the quality of care for each resident, the plan encourages exchanges with families and helps to defuse risky situations. In 2022, 80% of residents has an updated personalised support plan.

### **Mini nutritional assessment (MNA®)**

In addition, Colisée has introduced the Mini nutritional assessment (MNA®) to help prevent and anticipate undernutrition of residents. The MNA® is an internationally recognised standard that provides a simple, regular assessment of a person's nutritional status.

### **Reducing physical restraint**

In line with Colisée's philosophy of preserving autonomy, the teams reduce physical restraint as much as possible, which means adapting protocols. Each subsidiary draws up an action plan with alternative practices. The proportion of residents without physical restraint is 79% in 2022.

### **Reducing the use of psychoactive drugs**

The policy of reducing the use of psychoactive drugs helps to preserve the physical and cognitive abilities of each resident. New approaches are used to treat and relieve some symptoms. In 2022, the proportion of residents not taking psychoactive medication is 46%.

### **Training on well-treatment**

Colisée offers compulsory training on well-treatment in each subsidiary.

### **3.3 Defects in the quality of care**

Quality policies are implemented by the subsidiaries' medical directors and quality directors, coordinated by the head office Medical director. At facility level, the Head nurse, the coordinating doctor and the facility director are responsible for ensuring the quality of care. In addition to audits carried out by the facility and the subsidiaries' support departments, checks by the public authorities (see 2. *assessment procedures*) and training given to care staff, Colisée uses IT tools to ensure that care acts can be traced. Specific actions are taken at the level of each subsidiary.

#### **Traceability of care procedures**

Colisée has equipped itself with IT tools to ensure the traceability of care procedures and the dispensing of medication. These tools, which bring together all the information relating to a resident (medical file, Personal Support Plan, MNA®), make it possible to ensure staff coordination.

#### **Specific actions carried out in each subsidiary**

In France, a medical report is drawn up annually by the coordinating doctor in each facility and sent to the regional healthcare institutional body (Agence Régionale de Santé). Presented to the facility's teams, it proposes measures to improve overall care and the approach to medication. In addition, the risks for each resident are assessed (aggressiveness, pain assessment, risk of unexpected exit, etc.) and the actions and presence are adapted.

In Belgium, each facility draws up a quality plan in the first quarter. This is based on all inspection reports, audits, client opinions and, in particular, an annual quality audit. A list of fourteen key controls is drawn up to ensure the quality of care. These points are analysed on a daily, weekly or monthly basis by the care teams (completion of the medication monitoring tool, falls/weight/infection reports, care plans, etc.). Particular attention is also paid to hygiene care. A monitoring form provides a detailed description of the care provided to residents.

### 3.4 Professional risks

Colisée puts in place processes to identify professional risks, as well as measures to prevent psychological and physical risks. In each subsidiary, a health and safety department draws up a prevention action plan. As a result, the measures taken over several years to reduce the number of accidents in the workplace are bearing fruit, with a falling incidence rate and a stable level of seriousness. The frequency rate of work accidents is 29 in 2022 and the work accident severity rate is 1.5 (see page 30 of the 2022 Mission Committee report).

#### Identifying professional risks

- Through internal and external audits

In Belgium, the health and safety director and support provider (Securex) review the company's various functions annually, and identify the occupational risks for each of them.

In Italy, each site undergoes a risk assessment through annual audits drawn up by the health and safety department, a doctor and employee representatives. The issues assessed cover employee health protection, the availability of protective equipment in the workplace, instructions for using medical equipment, etc. The audit reports are consulted by the Italian vigilance body. This body meets every six months to assess the management of the facilities.

- Through satisfaction surveys and staff representatives

Colisée conducts employee satisfaction surveys twice a year. This secure questionnaire assesses employees' experience on various topics (see page 12 of the 2022 Mission Committee report). Some occupational risks are identified through this channel. In France, a satisfaction survey dedicated to quality of life at work is carried out twice a year among all employees.

In addition, feedback from employee representatives helps to prevent psychosocial and physical risks.

#### Prevention of psychological risks

- Raising awareness

Various forms of awareness-raising are carried out in the subsidiaries.

In France, a discussion group for facility directors facilitates the exchange of best practices and difficulties encountered. Led by a coach, the sessions take place every quarter on a voluntary basis. In Belgium, employees have access to e-learning to reduce stress and improve quality of life at work. In Spain, information campaigns on employee health are conducted on a regular basis.

- Audits

Psycho-social audits are carried out in France by the regional human resources manager or an external consultancy, triggered by certain factors (tense social climate, suspected cases of harassment, takeover of a facility). As part of an audit, 100% of the facility's employees are interviewed. The regional director and the site director are responsible for reporting back to the teams and implementing the action plan.

- Psychological support

Psychological support is available via the PsyFrance hotline, which is displayed in all French facilities. In case of major events (industrial action, fire), facilities can arrange for PsyFrance to intervene on site.

In Belgium, Securex manages two schemes for employees: a psychological support hotline and consultations with psychologists.

#### Prevention of physical risks

- Risk of Musculoskeletal Disorders (MSD)

To combat accidents in the workplace, Colisée provides training against Musculoskeletal Disorders. This training is part of the annual training plan. Investments are made in equipment to reduce the risk of MSDs. In France, the rooms are equipped with transfer rails (modules that facilitate lifting). The Belgian subsidiary has set itself the target of installing this equipment in 100% of rooms in conventional units by the end of 2025.



- Risks of exposure to hazardous substances

All Colisée medical and paramedical staff have access to the appropriate personal protective equipment (masks, gloves, gowns). Staff are trained in the handling of harmful products and the correct use of personal protective equipment.

In Belgium, risk assessments are carried out on exposure to hazardous substances, leading to recommendations for less harmful alternatives where possible.

### **3.5 Shortage of medical staff**

The shortage of trained medical staff and the lack of appeal of these professions are the main causes of the shortage. Colisée is working in three areas to remedy this situation and guarantee the presence of competent staff: enabling staff to access training, diversifying recruitment channels and ensuring continuity of care.

#### **Employee training**

Employee training is a major area of development. Colisée adapts to local requirements to offer training courses leading to qualifications or diplomas. The proportion of employees taking training leading to a qualification or diploma is 11.2% in 2022.

In Italy, for example, a training programme has been set up to train paramedical staff. The OSS Academy offers a six-month training course in the profession of care assistant. It is based around courses and placements in medical facilities, and leads to a state-recognised diploma.

In France, a digital training course, é-Clore, is being offered to all Colisée service and hospitality personnel in addition to the existing courses. This training guarantees the professionalisation of service and hospitality personnel and is the first step in the training pathway for care assistants. Structured around 80 hours of distance learning, é-Clore aims to develop and strengthen the skills of the service and hospitality personnel, enabling them to provide support to residents and patients. End of 2022, more than 600 people are enrolled in the programme, 40% of whom have successfully completed their training and wish to continue on to a qualification course. The aim is for every service and hospitality personnel to benefit from this training in the future.

#### **Diversification of recruitment channels**

In Belgium, collaboration with medical universities enables to broaden the recruitment channels (facilitating internships, visibility through courses given). In Spain, specialist agencies are used to recruit medical staff from Spanish-speaking countries.

#### **Continuity of care**

In France, an "intervention team" capable of travelling on request in the event of staff shortages has been set up in 2022 to ensure continuity of care in facilities. Coordinated by the regional director, it can be dispatched on request. The team is made up of all functions: head nurse, doctor, site director, chef. An "essential mode" action plan is also triggered in the event of a staff shortage. This allows tasks to be reorganised according to the number of missing staff.

In addition, the French subsidiary is developing telemedicine and remote medical coordination to combat medical deserts.

### **3.6 Epidemics and pandemics**

Colisée has a procedure for dealing with epidemics and pandemics. The aim is to contain the spread of epidemics and pandemics while maintaining the clients' quality of life.

The epidemic management process is defined and regularly updated by Colisée headquarters, before being adapted at national level in accordance with the regulations in force. A COVID epidemic management procedure has been specifically implemented by Colisée. A common digital process to all facilities makes it possible to monitor the development of epidemic waves in "real time" in order to allocate the necessary resources.

Vaccination campaigns against influenza and COVID are carried out at Colisée headquarters on a weekly basis. Health nurses and doctors are responsible for raising employee awareness, and vaccination schemes are facilitated to increase the coverage rate.

In addition, each site ensures that it has a sufficient stock of personal protective equipment (PPE). Data is reported to the subsidiaries and headquarters on a weekly basis.

Minimum PPE stocks are specified in Colisée France's « Plan Bleu » (a document setting out all crisis management procedures: extreme cold, flooding, heatwave, terrorist attack, etc.).

### **3.7 Food contamination and water quality**

#### **Food contamination**

Colisée is subject to European health and safety regulations. In order to meet these requirements, HACCP (Hazard Analysis Critical Control Point) procedures and a health management plan are implemented in each facility. External laboratories ensure that they are properly applied by checking the compliance of processes and premises, and by carrying out microbiological analyses of products and surfaces.

In addition, annual food safety audits are carried out internally (see 2. *Assessment procedures*). Cooks receive annual training in food handling, allergens and analysis to limit the risk of food contamination.

In Belgium, in addition to the compulsory controls carried out by the Federal Agency for the Safety of the Food Chain, some facilities are SMILEY certified for a period of 3 years, guaranteeing maximum food safety. The "SMILEY" is a sticker certifying that the company has set up a credible, validated and certified self-checking system.

#### **Water quality**

To guarantee the quality and potability of the water, analyses are carried out at least once a year by an external laboratory in all our facilities. Any anomaly is reported within 24 hours and dealt with using technical processes and action plans specific to the facility concerned. A systematic counter-analysis confirms that the anomaly has been rectified.

A major risk arising from water in facilities is the risk of legionellosis. In order to manage this risk, all facilities carry out the following actions:

- Water analyses carried out by an external laboratory several times a year
- Regular replacement of hoses and aerators, at least once a year or disinfection every 6 months
- Water temperature control in closed circuits
- Weekly draining of hot water tanks to prevent stagnation

### **3.8 Insecurity of facilities**

#### **Regulatory controls**

In line with legal obligations, all Colisée facilities are inspected annually to certify the safety of the buildings. In the event of non-compliance, remedial action plans are put in place.

In France, facilities comply with regulatory controls:

- Specific audits, carried out by external service providers on: electricity, gas, kitchen (annual); fire-fighting system (every three years); lifts (every five years);
- The External Safety Commission meets every 3 years to renew the safety authorisation required to open the facility. This commission brings together the prefecture, the fire brigade and the site director.

#### **Internal controls**

Building security is overseen by a maintenance officer at each of the sites.

With regard to fire safety in buildings, evacuation drills are carried out in all our facilities. New employees receive fire safety training and a safety booklet.

In addition, maintenance contracts with specialist companies ensure optimum levels of safety. Equipment inspections are also carried out (boilers, air conditioning systems, fire extinguishers, etc.).

### **3.9 Violation of data confidentiality regulations**

In order to comply with the General Data Protection Regulation, Colisée has implemented specific policies in each subsidiary. A contact person at Colisée's headquarters ensures that Colisée is compliant in its entirety. National policies are managed by national delegates trained in data protection. These delegates manage all requests (right to deletion, breaches, etc.) and ensure that procedures are applied. Data breaches (destruction, loss or unauthorised disclosure of personal data) are monitored monthly by each subsidiary.

Employees sign an IT charter incorporating the GDPR requirements to be complied with when they join Colisée. In addition, two awareness campaigns have been carried out:

- a campaign aimed at managers,
- an ongoing campaign aimed at other employees via department meetings, on-site training and an e-learning platform.

In 2022 :

% of managers trained in GDPR	% of employees trained in GDPR
France: 50%	France: 50%
Belgium: 100%	Belgium: 10%
Spain: 100%	Spain: 92%
Italy: 100%	Italy: 81%

The risk of a breach of data confidentiality regulations also depends on the parties involved, particularly suppliers. To ensure compliance, all suppliers involved in the collection, processing and storage of personal data must sign a GDPR charter. Data storage is managed by servers hosted by certified "health data accreditation" outsourcers.

Between 2021 and 2022, Colisée worked with a firm of experts to upgrade its compliance, governance, processes and subsidiary documentation.

### 3.10 Cyber-attack

A formalised IT security policy is rolled out in 2022. The security system is being strengthened with an external security operations centre (SOC) to supervise data flows, detect suspicious traffic and block attempted remote attacks.

Other actions to prevent and remedy the risk of cyber-attack have been put in place, including ongoing technical security updates, password changes, event reviews with the outsourcer, etc. Annual cyber audits are also carried out by external service providers in all subsidiaries.

To limit the risk of cyber-attack, Colisée has set requirements for its IT suppliers. In order to ensure good practice, a Cybersecurity Charter is included in contracts. In some cases, an improvement plan can be agreed with the supplier to enable them to meet Colisée's requirements. 100% of the IT suppliers who process Colisée's sensitive data are signatories to the charter.

### 3.11 Corruption

To limit the risk of corruption, Colisée has drawn up a code of ethics that applies to all its subsidiaries.

A Colisée France anti-corruption policy was formalised in May 2022. It describes the values and fundamental principles that Colisée and its stakeholders undertake to respect in the fight against corruption and influence peddling. It identifies areas of risk with regard to the specific nature of Colisée's business and provides tools for determining the behaviour to adopt in order to preserve Colisée's values, image and reputation. The anti-corruption policy is attached to the internal regulations posted in each facility.

In addition, an e-learning programme on the subject of corruption is followed in 2022 by the employees most at risk, in particular the executive committee, the real estate department, regional directors and site directors.

In Italy, an anti-corruption policy is in force since 2018. It sets out the relevant values and principles that guide the company's activity, in compliance with Italian Legislative Decree no. 231/2001. To comply with Italian law, Colisée Italy is implementing the following actions:

- Risk mapping of possible offences
- Clauses in contracts with external parties
- An Italian code of ethics stipulating the rules applicable to external and internal parties to avoid corruption (distinct from the Colisée Code of ethics, also applied in Italy)
- A whistleblowing procedure
- Internal procedures to limit crime
- A procedure to guarantee the safety and security of employees

### 3.12 Environmental impact of Colisée's activities

To reduce its environmental impact, Colisée is deploying a low-carbon strategy in line with the Paris Agreement. Colisée defines targeted actions through an annual assessment of its carbon footprint. This assessment, carried out since 2020, covers scopes 1, 2 and 3. Greenhouse gas (GHG) emissions amount to 178 kt eq. CO<sub>2</sub>, of which 14.4% come from Scope 1, 4.3% from Scope 2 and 81.3% from Scope 3. The trajectory for reducing greenhouse gas emissions by 2030 is validated by the Science Based Target Initiative in 2022.

#### Impact of food

Food is one of the main sources of greenhouse gas emissions, accounting for around a third of the company's carbon footprint.

Whenever possible, priority is given to local (<100 km), seasonal and labelled products. Meals are 'home-cooked' in each facility, which makes it possible to control where the food comes from and how it is processed, as well as promoting energy-efficient cooking methods. In 2022, the proportion of food served in catering facilities that comes from responsible products (local, organic, labelled) has risen to 62% of total catering expenditure.

In France, efforts are made to reduce meat consumption by promoting vegetarian alternatives, while still providing essential nutrients. Actions are taken to reduce the carbon footprint associated with the transport of food purchases (e.g. weekly deliveries, optimisation of logistics flows).

In Spain, the "Control Cook" tool makes stock management more fluid and helps to develop menus, quantities and nutritional intakes based on the needs of residents. The tool helps to minimise food waste.

#### Impact of energy consumption

The second largest source of emissions is energy, which accounts for around 20% of Colisée's greenhouse gas emissions. Colisée's teams have worked on implementing specific actions to limit and guide consumption choices.

The first lever for action is the type of energy used. Colisée has set itself the target of using 100% green electricity by 2023. By 2022, the proportion of green electricity is 75%.

Since summer 2022, the majority of French facilities have also been supplied with biogas, with lower emissions than fossil gas.

In addition, the second lever for action involves improving the energy efficiency of buildings. A campaign of energy audits carried out by expert firms is helping to identify ways of increasing the energy efficiency of buildings.

The third lever for action is to work on the amount of energy consumed. Raising awareness among staff and residents is crucial to creating a collective commitment to eco-responsible behaviour. For example, a sobriety plan is in place in France to reduce energy consumption. The plan involves energy savings in laundry, lighting and lowering the temperature in facilities.

#### Impact of mobility

A third area is employee travel, which accounts for around 10% of Colisée's carbon footprint in 2022. As a result, Colisée has implemented the following action plans:

- Conversion of the vehicle fleet to electric models
- Installation of recharging points in facilities
- Facilitating the use of bicycles: installation of bicycle parks in some facilities, facilitating bicycle hire in Italy, etc.

#### Impact of waste

The waste generated at Colisée represents around 10% of the carbon footprint. Generally speaking, waste is managed by the facilities in accordance with established procedures and local regulations. Colisée is taking a number of steps to reduce food and medical waste, among other things.

- Food waste  
As part of the EGALIM law, Colisée France has set itself the target of reducing food waste by 50% by 2030. To achieve this, training is provided to teams. In France and Belgium, a partnership with TooGoodToGo is helping to further reduce food waste by offering surplus cooked meals at reduced prices.

In addition, some facilities have set up a food waste recovery system, using a service provider for methanisation. Other facilities have installed composters:

- Waste from care activities involving infectious risks

The management of waste from care activities with infectious risks represents a real challenge in terms of reducing the environmental impact of Colisée's activities. The carbon impact of treating medical waste is three times greater than that of household waste. In order to raise awareness among employees, training and awareness-raising sessions are held in the facilities.

In France, the tonnage of infectious waste in December 2022 compared with spring 2022 has been reduced by a factor of three. In Belgium, the reduction is around one tonne of infectious waste between 2020 and 2022 (19.7T in 2020 compared with 18.8T in 2022).

### **Impact on water**

- Water consumption

Colisée is working to reduce its environmental footprint by cutting water consumption in its buildings. Connected water meters are installed in the majority of facilities in order to continuously monitor water consumption and identify potential leaks. Rainwater collectors have also been installed in the facilities. The recovered water is used to maintain green spaces and, in the case of Belgium, for sanitary facilities.

- Water pollution

Polluted water is treated before being returned to the water circuits. Backflow prevention devices and non-return valves are installed to guarantee the quality of the water discharged into the facilities.

Colisée complies with the legal requirement to carry out an annual analysis of wastewater from wells and treatment plants. The aim is to ensure that the composition of the water complies with regulatory levels before it is released into the environment. Additional analyses are carried out internally and by specialist companies to ensure the quality of the water discharged.

### **Impact on biodiversity**

In order to limit the impact of its activities on biodiversity caused by the land artificialisation required for the construction of new buildings, impact studies are systematically carried out prior to any construction project.

Some very local initiatives are carried out to preserve biodiversity on Colisée sites. This is the case in France with a facility that has obtained the Eco-jardin label (certification of the ecological management of green spaces).

### **3.13 Purchasing risks**

As part of its purchasing policy, Colisée is committed to making its entire sphere of influence responsible, by involving its subsidiaries and partners. To this end, Colisée has formalised its commitments and expectations of its suppliers in a Responsible Purchasing Supplier Charter. It is systematically attached to call for tenders and to framework contracts. At the end of 2022, 91% of the volume of purchases was made from suppliers who had signed up to the charter in France. In Belgium, in the case of suppliers working with subcontractors, a similar document specific to subcontracting is signed by the supplier.

One major focus is reducing the carbon footprint of purchasing. For example, in 2022 Colisée France is working with a number of suppliers to draw up carbon footprint reduction plans in three categories: cleaning products, medical devices and energy.

In Belgium, visits are made to the main food suppliers to check that the actions communicated are being properly applied and to identify areas for improvement to minimise their impact.

The reduction in the carbon footprint of the main emission sources is described in section 3.9.

## 4. Alert and complaints mechanisms

Alert and complaints mechanisms are available to all Colisée residents and employees, in all facilities. Alerts and complaints are reported either directly or anonymously.

### Direct alert and complaints mechanism

A complaint may be written or oral, by a resident, a relative or an employee.

- In person: for residents and relatives via employees / facility directors,... for employees via the staff representative / management
- By telephone: using telephone numbers visible to everyone to alert headquarters, a site or an employee representative
- By email: via the email addresses and contact page on the website
- Paper form: via a form available at the facility reception desk
- Verified reviews: via the verified review system set up by Colisée
- Subsidiary-specific systems: for example in France (mediator, Social life councils, psychologist platform), in Belgium (Securex psychological support provider)

All complaints must be declared on an IT tool using a form so that they can be monitored, processed and closed. The director of the facility is informed of every complaint concerning his facility. He manages them with the support of the resources he deems necessary (site management committee, regional management, legal department, quality department). He is responsible for the response given to the person who submitted a complaint.

### Verified opinions, a listening system based on continuous improvement

Over the last three years, Colisée has developed and strengthened the system that is used to listen to our clients, who are regularly asked to give their feedback on the quality of the services and areas of improvement. A trusted third party handles the entire ISO-certified process (ISO 20488). The secure questionnaire, which comprises a dozen questions, assesses the experience of residents and their family members through a series of themes. Colisée asks clients how likely they would be to recommend a set of services or a facility. This information is used to calculate the Net Promoter Score (NPS). The questionnaire also gathers comments by asking open-ended questions and then closely analyzing the answers. To do this, Colisée has teamed up with Better World, whose artificial intelligence solution performs a semantic analysis to categorize feedback from clients and family members.

The teams at Colisée facilities undertake to respond to comments left by relatives within 72 hours, whether the opinion is positive or negative. Ratings and comments are published in full transparency on Colisée websites. The same process has been deployed for Colisée employees, respecting their anonymity.

### Serious undesirable event procedures

In France, depending on the type of complaint, it may be reported as an undesirable event or a serious undesirable event. The main aim of this procedure is to implement a risk management approach. It also involves the continuous improvement of professional practices and the organisation of training on topics that are regularly the subject of undesirable events.

Each event is reported using a form that is kept for internal processing before being anonymised and sent to the regional healthcare institutional body (Agence Régionale de Santé) and the Departmental Council. The facility's risk management committee assesses the criticality of the reported undesirable event and identifies the causes in order to define an action plan aimed at eliminating the risk of recurrence. Managers are appointed to ensure that corrective action is taken within set deadlines. Statistical monitoring of these events enables the frequency, type, development and causes of reports to be analysed.

### **Anonymous alert and complaints mechanism**

Internal platforms or procedures allow residents, relatives or employees to submit comments anonymously.

In France, the professional whistleblowing system « Integrity Line », introduced in 2022, enables any stakeholder (resident, relative, employee) to anonymously report abuse by passing on the information. On a dedicated platform, the report takes the form of a simplified form to collect the facts that are essential for handling the alert. The system guarantees the confidentiality of the whistleblower's identity. The types of reports concerned are:

- A felony or misdemeanour
- A serious and manifest breach of the law or a regulation
- A serious and manifest breach of an international commitment duly ratified or approved by France
- A serious and manifest breach of a unilateral act of an international organisation taken on the basis of a duly ratified international commitment, or a serious threat or injury to the public interest.

A committee is responsible for receiving, processing and archiving alerts received. All alerts must be acknowledged within 48 hours, and the whistleblower must be kept informed of progress at every stage.

In Belgium, Spain and Italy, anonymous alerts are sent by post, telephone or online.

### **Communication of mechanisms**

The mechanisms are clearly communicated to residents, relatives and staff through a number of channels:

- Onboarding contracts and manuals
- Notice boards in each facility
- Information meetings
- Website
- Information by e-mail

## 5. Monitoring the measures implemented and evaluating their effectiveness

### **Governance**

All the bodies involved in drawing up the plan are also involved in steering the vigilance plan.

Our aim is to update this plan in function of changes in risks and associated prevention measures.

### **Monitoring indicators**

In order to monitor the measures implemented and evaluate their effectiveness, Colisée relies in particular on indicators established as part of its extra-financial reporting.

A selection of indicators is published in Colisée's annual Mission Committee Report: [Mission Committee Report 2022](#)

These indicators are reviewed by an independent third-party organisation.



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