

Ethics Charter

March 2011

Cegedim's fundamental values are **fairness, respect for others, preservation of the environment and economic efficiency**. One of our major challenges is to provide the highest added value to our customers, partners, shareholders and employees.

The purpose of this Charter is to serve as a reminder of the Group objectives in these areas and the associated rules of good conduct. The Charter is a reference for all employees to guide behavior and delineate responsibilities. The rules here listed are not exhaustive.

Our Ethics

- Conduct all Business activities according to the applicable laws and regulations in force in each country where the Group operates.
- Ensure that we conduct our business with a positive contribution in each country.
- Put Cegedim's employees at the center of the Group development strategy and offer each one the potential for reward and career advancement based on performance, accomplishments and contributions to the success of the company.
- Apply and respect the **12 commitments of the Cegedim Compact**.
 - Eliminate all forms of forced and compulsory labor
 - Condemn work by children under the age of 15, except for training
 - Eliminate all unlawful discrimination with respect to hiring and job performance
 - Promote individual success
 - Ensure a favorable working environment at all company sites
 - Promote local employment and respect local laws
 - Take initiatives in favor of more responsible environmental practices
 - Fight corruption in all forms
 - Guarantee the security of the Group's assets and those of its clients
 - Ensure the confidentiality of client information
 - Respect Data Privacy Laws at the global level
 - Control travel
- Conduct our business, in all countries, according to the highest standards of honesty, integrity and equality, in accordance with the principles of our Cegedim Compact.
- Offer to our suppliers, partners and subcontractors opportunities for success, within a competitive, open and fair environment but also in a spirit of collaboration, partnership and mutual benefit.
- Communicate with an open and transparent approach towards our shareholders, investors and the financial community, ensuring the pertinence of the information provided.

Our values

In fulfilling their missions, the employees of Cegedim shall endeavor to comply with the following rules of conduct:

- Protect confidentiality of information and access to data according to their missions and responsibilities.
- Ensure that gifts and invitations received or offered have a symbolic value in accordance with acceptable local practices, regulations and customs.
- Use all available and/or assigned office equipment and material, toward the completion of individual work and Company objectives.
- Apply Cegedim communication rules when communicating on behalf of the Group, particularly in relation to journalists and analysts.
- Make no public statements that contradict with the Group's stated objectives and operating philosophy.
- Inform his/her management of potential conflicts of interest that may give the impression of influence over his/her judgment and acts.
- Refrain (1) from occupying another position or function, (2) from holding financial interests in an organization that would be a competitor, client, supplier or commercial partner of the Cegedim Group, where by the said position or interests would interfere with the performance of obligations owed to Cegedim or have an influence or appear to have an influence on the relationship with Cegedim. Such position or interests may only occur whilst buying a portfolio of securities in compliance with the rules prohibiting the use of privileged information.
- Ensure not to sell, transfer or assign any asset belonging to the Cegedim Group without proper authorization and the necessary documents.
- Protect information and privileged data which an employee may access because of his/her professional activity, using them only as part of his/her functions, and respecting the obligation of confidentiality towards third parties.

Ethic Committee

The Cegedim Group Direction is accountable to its customers and employees as to the respect of values and principles set out in the Cegedim Groups' Business Charter, under the guidance and assistance of an independent Ethics Committee.

The Ethics Committee has the possibility of issuing a recommendation proposing to change or modify the Charter, which will reflect any evolution of laws, regulations or Cegedim Group values (where appropriate, after working council's opinion).

Charter distribution

This charter is delivered to each Cegedim employee and future employees to take acknowledgement of.

Its presentation to employees engages their commitment to be permanently attentive to Cegedim's values and to scrupulously respect the aforementioned ethics.