

An abstract graphic on the left side of the page, composed of numerous thin, light green lines that curve and sweep across the dark blue background, creating a sense of motion and depth.

2019

STATEMENT OF NON-FINANCIAL PERFORMANCE

2019 Cegedim Group



Summary

SNFP for 2019 Cegedim Group

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6.1 Cegedim Group overview and core values

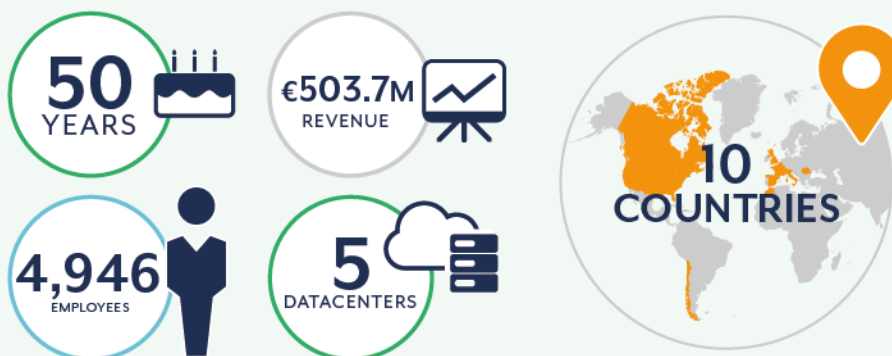
About us

Founded in 1969, Cegedim is an innovative technology and services company in the field of digital data flow management for healthcare ecosystems and B2B, and a business software publisher for healthcare and insurance professionals.

The Group is also active in human resources management and digitization services for all types of industries.

In 2019, Cegedim celebrated its 50th anniversary with a series of in-house gatherings for Group employees and an evening event for customers with a speech by the winner of the 2014 Nobel prize for economics on "Health economics and the pursuit of the common good". The last 50 years have been full of rich, fruitful relationships with our partners, customers, and employees; and packed with technological ventures prompted by society's digital transformation. Throughout that time we have constantly been driven by the pleasure we take in designing and creating new products and services.

Key figures

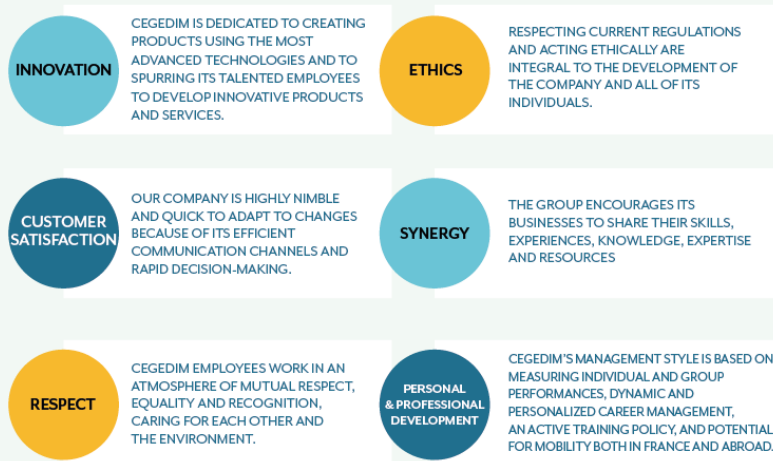


Our values

Cegedim Group's growth strategy is based on a high standard of innovation, quality, and investment, and strong core values. Our values start with the men and women who contribute to the Group's corporate ecosystem. They are based on equality, respect for others, environmental conservation, and economic efficiency.

These values help us achieve one of our top goals—delivering strong added value to our clients, partners, shareholders, and employees.

These values unite all our stakeholders.



6.2 Business models, business activities, and value chain

A nimble organization designed to foster innovation and a team mentality

Business model

Cegedim Group is organized into business units comprised of companies led by responsible entrepreneurs who successfully convey and promote their products' technological excellence in sectors with strong growth potential.

We aim to provide clients with a one-stop service offering, which means our companies need a high degree of industry knowledge and specialization. Our technical teams work on a product from the innovation stage all the way to the production stage, and our product development teams always know exactly what our clients need and what we can offer them.

Value creation: the Cegedim ecosystem

Our ecosystem is structured around our clients in the healthcare industry—doctors, allied health professionals, pharmacists, insurers, and public health authorities—and how they interact with patients. It is a unique platform that provides these clients with the tools they need to deliver excellent services when solving healthcare sector challenges. The strength of this business model lies in the fact that all these companies co-exist within the Cegedim ecosystem, communicating and interacting around our products and services.

Two other types of offering round out our business model: SRH human resources management solutions, and SY by Cegedim digitalization solutions. Their products and services are designed for companies in all industries, both inside and outside the health sector.

Our strategy: transform to strengthen our competitive advantages

The outlook for Cegedim's market is one of solid growth despite short-term uncertainty. Key growth drivers are:

- French government reforms with significant regulatory changes that benefit our activities (health, payroll, data flow digitization, etc.);
- The fact that healthcare systems are increasingly complex and need to be made more efficient;
- An aging population and the growing prevalence of chronic diseases;
- The shortage of doctors in rural areas;
- The push to boost patient engagement.
- All these factors are feeding the need for more innovation and technology—including SaaS, the Cloud and artificial intelligence—and more health data. Cegedim invests heavily in innovation. For example, in 2019, it devoted 12.3% of its revenue to paying its R&D staff.

The need to digitize the economy, services and the health sector (patient medical records, prescription and diagnosis aids, remote consultations, and third-party payment, to name but the most visible issues), and the need for health data (for example to aid the diagnosis of rare diseases), are all factors that will ensure the Group's future profitable growth. At the same time, there is a growing need for outsourcing—for both outsourced payroll and human resources management, and outsourced health insurance management services.

Cegedim, which operates in constantly evolving markets and has refocused on its strategic activities, has solid fundamentals, a balanced portfolio of complementary services, a diversified customer base, wide geographic coverage, the clout that comes from being an integrated Group, and operational and financial discipline. All this should enable us to carry on growing as we did in 2019, maintaining a robust, lasting, and profitable performance (See Chapter 3 "Management discussion and analysis of the financial year", Point 3.6 "Outlook", and Chapter 7 "Risk management" and notably "Covid-19 epidemic related to the coronavirus").

Strategy and transformation

In 2019, Cegedim Group continued to transform its business model—a process we kicked off in 2015 with the sale of our CRM activities. We have now successfully refocused on activities in Europe and restored lasting growth. We also once again have the funds to make cutting-edge technological investments, and therefore acquired several tech gems in 2019: successively Ximantix in Germany, BSV and Cosytec in France, and NetEDI in the UK.

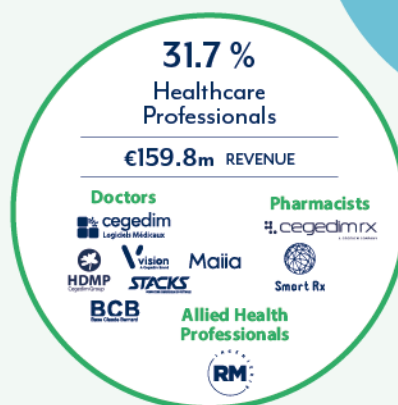
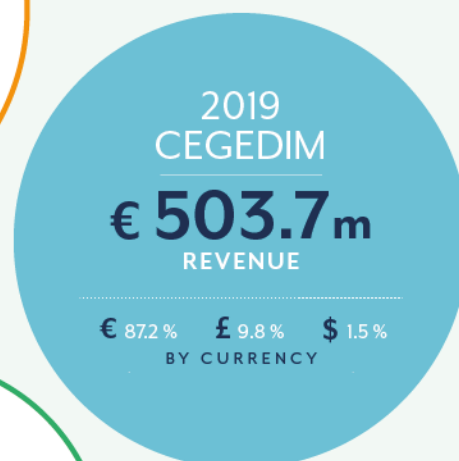
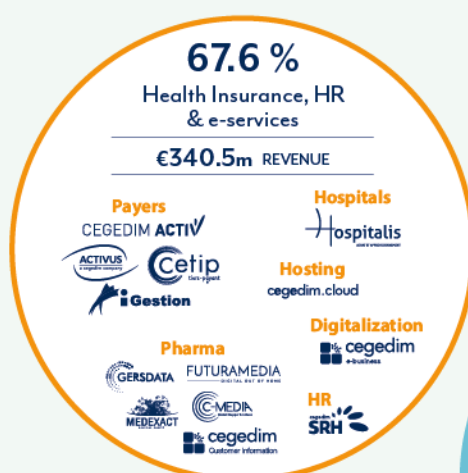
Cloud, SaaS, and digital technologies are the focus the Group's transformation and have also helped drive our investments in data and business process outsourcing services (BPO). As a result of constantly evolving, complex regulations, we must continuously innovate and create new tools to deliver the indispensable solutions our clients need to meet the new requirements. These growth areas are the bedrock of our development strategy in France and abroad for the years ahead.

Our strategic priorities are therefore the synergies generated by our comprehensive offerings and the innovative tools with which we help clients navigate their digital transformation. This digital transformation is a major opportunity for the healthcare sector, because it cuts costs and improves the quality and accessibility of care. Our strategy will benefit society since it contributes to the overall improvement in everyone's health, well-being, and quality of life.

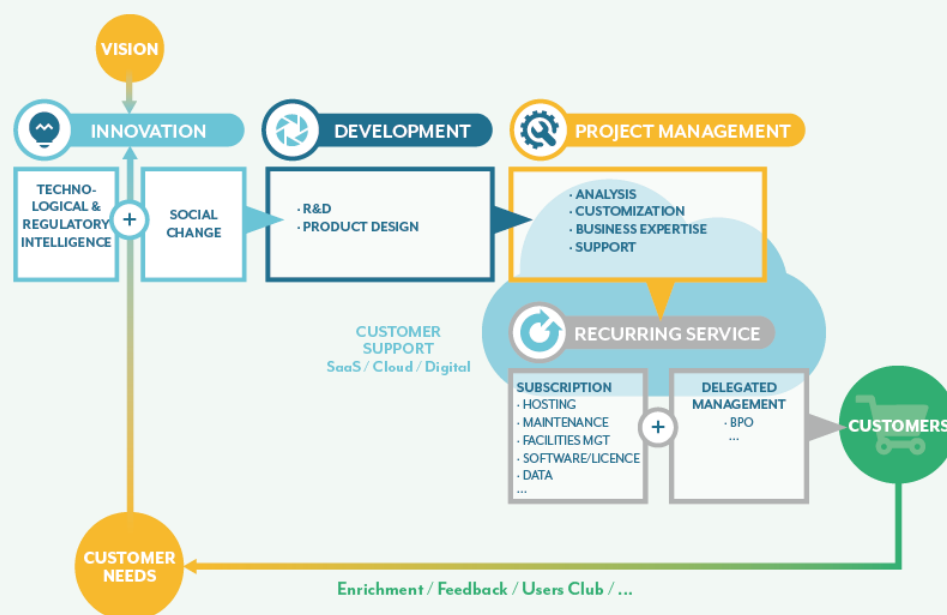
Our activities

Our two main operating divisions share:

- A healthcare ecosystem,
- Strict regulatory frameworks,
- Aspirations of market leadership.



Value chain








Value is created differently in each of the operating divisions.

Value is created differently in each of the operating divisions

To offer a diverse portfolio of suitable products and solutions, this division's business model is based on:





- tailored products and services for large corporate clients,
- a project-by-project approach that requires lead time to design and execute solutions suited to the complexity of each client's needs,
- the option of SaaS or hosted management formats, plus BPO.

Product	Solutions	Key figures
 Insurance	+ Software + Digital Solutions + BPO + Third-party payment management	• 43 million persons managed • 3 billion healthcare invoices handled / year
 Digital and Data	+ E-promotion + Digital communication + Data & sales statistics for pharmaceutical & HABA products	• Network of 7,000 screens in pharmacies in France
 HR	+ SaaS platform for HR management + BPO	• for all industries • 8 million payslips / year
 e-business	+ SaaS platform for electronic data exchange including payment and process digitalization platforms	• for all industries • 900 million flows
 Other services	+ Outsourced services	-

Value creation: The Healthcare professionals division

To offer a diverse portfolio of suitable products and solutions, this division's business model is based on:

- packaged product and service offerings for professionals, clinics, and pharmacy chains,
- management software designed for use in individual practice or clinics,
- client support based on a dense nationwide network of local representatives, a helpline, and maintenance services.

Product	Solutions	Key figures
 Pharmacy software	+ Integrated software for pharmacies + Web solutions for patient monitoring and third-party payment	- 36% market share in the UK - 720 million prescriptions managed / year in the UK
 Doctor software	+ Practice Management Software + Electronic patient record management, billing solution, Revenue Cycle Management SaaS/ mobile solutions	- #1 France, Italy, Spain - #3 United Kingdom
 Paramedical software	+ Practice management software + Integrated mobility solutions	- 49,000 healthcare practitioners used RMI in France in 2019
 Medication database	+ Medication database + Apps and web portals providing access to the database	- Used by healthcare professionals in 5 countries - Approved by the «Haute Autorité de Santé» since 2008

6.3 Group CSR challenges and goals

Workforce-related, Social, Environmental, and Ethical Responsibilities

Identifying and assessing CSR risks

We refer to the following:

- The 43 provisions of the Grenelle II Act as laid out in Article L225-102-1 of the French Commercial Code,
- The 17 United Nations Sustainable Development Goals,
- The ten principles of the United Nations Global Compact,
- The new requirements of the 2014/95/EU Non-financial Reporting Directive transposed into national law, notably anti-corruption and tax evasion measures,
- The provisions of the Sapin II Act and the Cegedim Group Ethics Charter,
- The risks listed and detailed in the Group's Annual Registration Documents/ Universal Registration Document

CSR risks and challenges

Looking at the Group as a whole, and at its two main business models, we have identified and analyzed material non-financial CSR-related risks, taking into account their workforce-related, environmental, social, and ethical aspects. This exercise was conducted collectively and led by the Chief Compliance & Risk Officer. The approach and results were approved by the governing bodies.

We identified five priority risks:

- Loss of top talent and the inability to retain employees;
- Damage to infrastructures or data;
- Negative environmental impact of our activities;
- Damage to our reputation;
- Unethical behavior.

We have taken these five risks as the starting point for this statement. In it we describe the mitigation policies we have implemented and their outcomes, all of which are based on meeting the following five challenges:

- Attracting and retaining suitable human resources
- Protecting stakeholder data
- Limiting our environmental footprint
- Upholding the Group's reputation
- Behaving ethically

Our objectives

To meet these challenges in a meaningful way, Cegedim Group implements policies and due diligence that help improve its non-financial performance and achieve its objectives in these areas. These goals are grouped into key themes, which allows us to take a comprehensive approach to risk while also providing detailed responses based on the Group's actions. We monitor and measure our performance in these areas by looking at the results and relevant key performance indicators presented in this report.

6.4 Attracting, training, and retaining competent, qualified personnel

HR policy

In 2019, Cegedim's human resources policy helped advance its business activities. The policy fosters an environment in which employees can cultivate their skills to the fullest while also actively contributing to the company's performance. Cegedim adapts its compensation policy to motivate talented individuals and ensure training and recruitment, while at the same time keeping growth in payroll to a reasonable level.

Social equality

Cegedim Group's human resources policy reflects its keen interest in social equality. Our human-sized HR teams focus on communicating, imparting skills, and sharing experiences, which are critical ingredients for continuous personal development. We also have a proximity management policy which fosters rapid, efficient decision-making and nimble responses. Employees are appraised regularly and receive training and advancement opportunities. This allows them to enrich their skills and personal experience, giving them the prospect of taking on new responsibilities. Experience gained at Cegedim Group, a benchmark employer, boosts their employability.

Recruitment

Workforce

The Group is committed to strengthening its human capital, which it considers a prime asset. As a result, one of our key ongoing concerns is recruiting qualified personnel suited to our needs. This is a critical issue for Cegedim Group as a B2B company, because applicants and future employees may not have access to or know about our corporate communication and products. Our strong presence on professional social media sites gives us a high profile in France, and we actively use these sites to recruit.

Recruitment

To ensure we have the personnel needed for our business development, every year Cegedim recruits:

- Several hundred employees in France, with a growing focus on promoting diversity in the workforce and providing employment for persons with disabilities,
- A growing number of interns and young people under work-study contracts,
- Internationally, via the Group's operations in over ten countries.

To this end, at our Boulogne-Billancourt, Morocco, and Romania offices, we have created an area dubbed RecrutLab, with rooms specifically designed for recruitment efforts and applicant interviews.

Recent graduates

Most of our employees have a scientific or business educational background. The Group makes a concerted effort to recruit graduates through work-study programs in partnership with higher education establishments and universities.

Cegedim offers students and recent graduates internships in France and abroad. These internships put participants on a fast track to employment and often turn into permanent positions with Group companies. Some of our subsidiaries have annual internship programs to help students prepare research projects for their master's thesis and encourage young graduates to join the company.

In France, Cegedim participates in job fairs and a variety of student forums. We also have one position at our Spanish R&D subsidiary in Barcelona for young people on the V.I.E French international internship program.

University partnerships

Cegedim Group has several partnerships with higher education establishments: Group employees work with students at the University of Poitiers, the Sorbonne, and Simphon, an IT school in Paris. Cegedim is also the proud sponsor of France's first master's degree in HRIS (human resources information systems), which admitted its first students at the University of Paris I Sorbonne in September 2018 and is taught by Cegedim employees. We also promote work-study programs by offering the students apprenticeships with the Group's teams.

Speed-interviewing

We hold regular speed interviewing sessions at our French sites for applicants responding to Group ads or selected by recruiters. The sessions consist of a series of rapid interviews of around ten candidates by HR teams and relevant managers, who may then offer jobs to some candidates. Events like these complement traditional job ads and are promoted at schools in regions where Cegedim is looking to recruit. They generate around one-third of all hires and are mainly used to recruit HRIS consultants, sales and R&D staff.

Onboarding

New hires at French sites are onboarded in groups of roughly ten employees. On their first day, they are welcomed by the HR team, given a company presentation, and complete various administrative formalities. The welcome program, designed specifically by the Human Resources teams at corporate headquarters and the business units (BU), includes a number of job-specific training modules of varying durations: School SRH, insurance industry track, media or e-business, sales academy. Some of the BUs periodically hold "job swap" style programs to deepen the onboarding experience and assign mentors or buddies to the new hires. Some jobs may require more specialized training on arrival because of the nature of the business (e.g. drug safety).

Prior to a new recruit's arrival, the HR department goes over a checklist with their future manager to make sure everything is ready for day one. The onboarding process ends with an end-of-trial-period review with the manager.

Employee referral program

Cegedim Group created its employee referral program in France in 2011 and expanded it in 2018. The program rewards employees who refer job candidates whose skills match the Group's operational needs and who share our values. The group issued a reminder of the program's eligibility criteria in 2019 and imposed restrictions on the involvement of all managerial staff in the recruitment process, including top management and HR management.

Cegedim holds in-house events for referring employees and their referrals to give Group managers a chance to meet the candidates informally at themed gatherings.

Compensation policy

The Group's compensation policy aims to recognize talent by rewarding both individual and group-wide performance. Individual performance is primarily rewarded through variable compensation based on individual goals. Each year, Cegedim Group line managers meet with their team members one on one for a performance appraisal and review of annual targets. Every year, we use remuneration studies to verify that our compensation policy is in line with the market.

The Remuneration Committee is composed of three directors. The Appointments Committee is also composed of three directors. The chief tasks of these committees are to set the policy for awarding free shares and variable compensation and to create a succession plan for corporate officers in the event of an unplanned vacancy.

Work organization and quality of life

Employer brand

The Group has an active HR policy in support of its employer brand, detailed through this chapter, and in 2018 redoubled its efforts to build employee loyalty. There is generally a higher employee turnover rate among account managers in some of our specialized activities, which is typical of these professions.

Internal communication

In 2013, the Group set up an intranet that provides internal news and communication, notably a newcomer's guide, country-specific company information, in-house newsletters, the style guide, and local information per office location. Individual Group entities have also taken a variety of local initiatives. For example, around 20 screens were installed at the three Boulogne-Billancourt sites to display Group news; labor, legal, and industry updates; e-learning courses, and so on. The Group has installed the screens, which can also display information tailored to each BU and entity, at all sites with 50-plus employees in France.

In France, the BUs hold regular "Feel HR" meetings to bring their teams together and convey the latest company news. The Managing Director gives an annual presentation on the year's activity and highlights to employees in the Paris region. Employees in other locations can view the presentation over the Group intranet. When travelling abroad for roadshows, the Chief Investment Officer & Head of Investor Relations takes the opportunity to visit local subsidiaries and present the Group's annual results to employees.

Forging ties between employees

Joint after-work events for several BUs help create ties and build links between employees from different departments working at the same location, for example in Lyon or Nantes. Each entity organizes get-togethers at important times of the year or to mark important occasions (year-end party, team meals, etc.) and organizes retreats for teams or specific units as and when necessary.

Cafeterias and break rooms are also available at some sites, so employees can meet for business discussions in an informal setting over the weekly fruit baskets.

Cegedim Group celebrated its 50th anniversary at an iconic Paris stadium where the Paris teams gathered for a cocktail party and musical evening. Similar events were held at the other sites in and outside France as all our employees came together to mark this special date.

The right to disconnect

The Labor Act of January 1, 2017, enshrined the right to disconnect. However, we have not implemented any measures to block IT communication. This is because we cannot shut down servers or other IT infrastructure equipment during non-working hours, owing to continuity of service requirements and the resulting need for staff to be on duty. Cegedim meets the law's requirements by using tools to report time off and by creating an HR hotline that employees can call if they require a meeting to discuss their workload. Their situation is then analyzed and a remediation action plan drawn up with their manager.

Employee social and assistance committees

We cannot provide a detailed review of the activities of all the Group's works councils in this report. We can, however, note that they provide numerous employee perks, in keeping with local practices, for example housing benefit, discounts on leisure activities (sports, entertainment, culture, travel, and CESU home help vouchers), support with year-end holidays (gift vouchers, Christmas trees, etc.), school holidays (vacation vouchers), and other significant life events.

Healthcare coverage

At Cegedim, all employees have supplemental health insurance to cover their medical costs. We also offer optional supplemental insurance plans. In France, all employees have supplemental death, incapacity, and invalidity coverage and former employees can continue their supplemental health coverage. The Group is endeavoring to gradually expand this kind of health and protection benefit to countries where it is not required by law. In fact, nearly all the Group's employees have been offered health insurance and a supplemental pension plan. In 2019, we started installing defibrillators at sites with more than 100 employees across the Group.

Sport and wellness

In early 2019, we launched Cegedim Heroes, our own sport and wellness program and app. All Group employees can use it—they join their local team, based on their workplace location, and are encouraged to transform their daily life through exercise. They can take part in regular challenges and contests and are awarded health points for each physical activity they do. The program's aim is to improve personal well-being in the workplace. All sports count: walking, running, cycling, swimming, team sports, skiing, working out, etc. There are regular team contests as well as weekly individual challenges.

In 2019, we organized sports fundraisers in March, July, and November:

- the "eco-challenge" to plant 160 trees and save 160 trees with Eco-tree,
- the "vitamin-rich challenge" for the weekly delivery of fruit platters to the workplace,
- the challenge named " Ensemble pour la recherche contre le cancer des enfants" (Together for childhood cancer research), which raised funds for the Institut Gustave Roussy.

An advent-calendar themed challenge also took place in December, with daily surprises.

The program has been so popular with employees, that it will be continued in 2020.

Fighting discrimination

The Group does not discriminate when hiring and assigning positions. Job offers provide for wages without discrimination and raises are based on each employee's performance and experience. Any person who is a victim of or witness to discrimination has several means of reporting it. They may contact the Group Ethics Committee or an employee representative body, both of which will act with complete independence.

Disabled workers

Cegedim Group aims to facilitate the integration of workers with disabilities and combat all forms of discrimination. We are endeavoring to improve access to our buildings for the disabled. The Group complies with local regulations governing the employment of people with disabilities in all the countries where it operates.

Cegedim expanded its disability unit in 2018 to better assist employees known to have disabilities, regularly monitor their administrative paperwork, and make any necessary accommodations to their workstation and schedule. In 2019, the unit's remit was enlarged and bolstered—an external six-month assessment including over thirty interviews with a representative sample of employees was conducted in partnership with the Association de gestion du fonds pour l'insertion des personnes handicapées (AGEFIPH, a French non-profit that promotes the employment of people with disabilities). As a result of this initiative, we implemented an action plan that reflects our desire to see concrete results in this area.

In France, Cegedim grants employees with disabilities five days extra paid leave to attend to their medical and administrative formalities, as well as priority access to parking spaces and to the company's childcare services.

Organization of working hours

The working hours of employees in France—67% of the Group's total workforce—are based on a statutory annual total of 216 working days or 1,607 hours, and a contractual working week of 37 hours and 10 minutes. Any overtime entitles employees to RTT days off ("Réduction du Temps de Travail" or reduced working hours). Outside of France, local working hour legislation is observed in each country. We observe the International Labor Organization conventions in all the countries where we operate. Cegedim implemented remote working, both regular and periodic, in 2018. These arrangements give employees real flexibility to manage their time and travel. A collective bargaining agreement for mobile workers was also rolled out in 2018 and 2019. It accounts for the particular circumstances of employees who travel a lot for work, and classifies travel time as working time for roughly 500 mobile workers.

Since 2018, employees in France are also offered spots in the company nursery, which is operated in partnership with a leading provider. In 2019, the number of spots increased 24%, compared with a 70% rise in requests. The huge success of the 2019 campaign and the fact that we kept last year's spots, meant we were able to satisfy most of the new requests.

Leave sharing

Cegedim has introduced the leave sharing program for all employees in France so employees may help colleagues experiencing personal challenges. A collective bargaining agreement was concluded so that as many people as possible can benefit from this initiative and to allow donations to be supplemented by a contribution from the employer.

Collective bargaining agreements

Numerous collective bargaining agreements apply to the French subsidiaries and the Group as a whole. We cannot provide a detailed review of them all here. To date, none of the agreements reached in France has been opposed by employee or union representatives, which illustrates the success of the social dialogue.

In 2019 in France, negotiations related to collective agreements notably covered:

- Gender parity in the workplace,
- Leave donation,
- Remote working,
- Mobile working,

and supplemental health insurance cover for medical costs, profit sharing, employee savings plans, and compensation.

Regular exchanges regarding Quality of Work Life or QWL continue. These major advances build on the Group's ongoing efforts to accommodate work times and help employees achieve a better work-life balance.

Managing qualifications and skills

Skills

We operate in a variety of businesses and can help our employees enrich their skills and gain new experiences so they can take on new responsibilities. The Group's HR policy is based on training and internal mobility, because we believe that professional development is a major factor in motivating employees to achieve success. Joining Cegedim means seizing the opportunity to work in a high-tech environment where teams tackle a variety of interesting and challenging projects, all while continuously developing professionally.

Training

Training is a cornerstone of Cegedim's strategy, and we devote more resources than we are legally obligated to so that employees can realize their fullest potential. The Group's training policy combines a focus on individual progress, skills development, and company performance in order to keep pace with strategic projects and changes in the healthcare profession. In addition to the standard internal, external, inter- and intra-company training programs, the entities also provide continuous specialized training for some of the Group's very specific professions. As well as professional training, we provide first-aid courses.

e-learning

Cegedim has created an e-learning platform so employees can complete a series of courses during work hours by selecting from a wide range of training programs. This platform was used extensively in 2019 for both Group-wide training programs and specialized training courses for specific entity activities and professions.

Similarly, we have launched an external digital platform so our Research & Development staff can update their knowledge of new technologies in their field.

Skills sharing

Skills sharing is a key challenge for Cegedim Group that ensures our teams have the necessary knowledge and expertise. Our business units set up tailored training sessions by calling upon resources within their own teams. These initiatives allow us to meet the specific needs of our business lines, impart our culture, and pass on our expertise. Mentoring arrangements—which are required for vocational training, or work-study contracts—are also used in some subsidiaries to foster the internal employee mobility and integrate new recruits. The mentees are taught what they need to know for a given position (processes, procedures, tools, organization, etc.) or shown the skills required for specific jobs within the Group.

Some subsidiaries also offer close managerial monitoring for junior employees and mentoring schemes with more senior colleagues, and appoint advisors for employees who need assistance. A pilot mentoring scheme launched in the SRH subsidiary will be replicated across the Group's entities.

Internal mobility




Cegedim believes that professional development is a major factor in motivating employees to achieve success. When a vacancy arises, priority is given to internal recruitment. Internal mobility opportunities, with moves to different geographic regions, allow employees to develop their skills and knowledge of the business and also help the Group ensure the transfer of knowledge between its entities. To this end, we have an international mobility service for managers, salespeople, and technicians to handle requests for expatriate postings. These typically involve three-year assignments, transfers and short-term assignments from France to another country, from an international office to France, or between different international locations outside of France. Certain entities have a mobility commission with representatives from Group HR, local HR, and local management whose purpose is to review, twice a year, mobility requests for moves within the Group to France.

Results

Headcount	Employer brand and university partnerships	Training
2019 2018	2019 2018	2019 2018
4,946 4,562 Total headcount	24 17 Speed interview sessions (1)	17,067 24,245 Hours of training in France
3,364 3,051 Headcount France	16 2 Job fairs (2)	870 1,024 Employees trained in France
1,582 1,511 Headcount International	18 3 Student recruitment events (3)	103 - Group e-learning training sessions
1,465 1,508 New hires	23 56 Hires from (1), (2) and (3)*	4,482 - Employees signed up for Group e-learning sessions
1,067 1,152 New hires on permanent contracts	47 41 Work-study contracts	3,886 - Hours of e-learning, Group-wide
3,398 356 New hires on temporary contracts	28 16 Apprenticeships	372 - Internal mobility transfers in France*
1,182 1,268 Departures	15% 16% Work-study contracts and internships converted to permanent contracts	* Job changes and transfers between entities
4,682 4,382 Employees on permanent contracts	49 49 Internships	
264 180 Employees on temporary contracts	* The calculation method was adjusted in 2019—now it is based only on signed contracts, whereas previously it included all firm job offers made following the event.	
39.7 39.7 Average age		

Group gender equality 2019 2018	Health and safety in France 2019 2018	Quality of work life 2019 2018
45% 45% of employees are female	61 54 workplace accidents	417 271 French employees regularly work from home
55% 55% of employees are male	38,548 34,351 days of absenteeism	12.4% 8.9% of the French workforce
40% - female board members	11,5 11,3 average number of days of absenteeism excluding overtime rights (RTT) and paid leave	230 188 part-time Group employees
60% - male board members		4.6% 4.1% of the workforce
		1,770 - Employees participating in Cegedim Heroes

OBJECTIVES AND KEY PERFORMANCE INDICATORS

	Percentage of confirmed permanent contracts	2019 2018 76% 81%	Attract employees Employees on permanent contracts in 2018 whose trial periods were confirmed by December 31; does not include employees still on trial period at that date. A formal interview is conducted at the end of the trial period, and HR analyzes the results and takes corrective actions if needed.	Objective Maintain at ≥ 75%
	Confirmed employee referral hires in France	2019 2018 109 125	Promote employee referrals The criteria for employee referrals were tightened in 2019 to exclude certain cases, as detailed in this chapter.	Objective Maintain at ≥ 100 employee referral hires a year
	Recruiting events	2019 2018 48 22	Maintain a visible presence through recruiting events These events consist of speed interviews, job fairs, and student recruitment events. We also hold employee referral events that are not counted here. The number refers to events held in France.	Objective Maintain at ≥ 1.5 events per month

6.5 Securing stakeholder data

Security is a key priority

Cegedim Group supplies technology and services related to information and databases, so one of our top priorities is ensuring that our clients and partners are entirely comfortable with the level of data and system security. Cegedim's businesses process sensitive data, notably personal health records. For Cegedim and its employees to be successful, it is vital that we respect current regulations and strictly follow our code of ethics. For the Group to grow and remain in business, we also need to develop the right products at the right time and anticipate the services consumers want and the technological innovations the industry needs.

Information system security

A secure, resilient, durable infrastructure

Cegedim strives to build robust security for its sites and its datacenters. Security is an ongoing, vital concern, and the Group does all it can to limit the impact of events that might damage its assets, products, and infrastructure. Its on-site risk-control policy covers fire, flooding, or other natural disasters, as well as power outages and cyberattacks, such as malware or penetration.

System and data security

The Information System Security Policy developed by the Group covers system and data security and is supplemented by an Information System Security Charter included in every employee's job contract, as well as a guide to data security available on the Group intranet. Specific clauses have been added to the job contracts of employees whose responsibilities expose them to data, confidentiality, and intellectual property issues.

Data protection

The policy and charter rules and recommendations aim to protect data in all its forms—spoken, paper, or electronic—and respect its confidentiality, integrity, availability, and non-repudiation. They cover not only the Group's information systems (networks, computers, software, data, and communication and copying resources), but also information shared orally or in writing, and physical protection both on and off the company's premises. Cegedim Group subsidiaries set out and clarify the rules governing IT policy in a body of documentation covering security within the scope of their business activities. The Group IS Security Policy serves as a mandatory baseline for which rules to apply.

Business and service continuity

The Group spreads out its IT centers geographically and uses state-of-the-art information technologies to execute its business and service continuity strategies. It also has appropriate insurance policies covering certain industrial risks.

A dedicated security team with experience in critical data hosting oversees operating security, in conjunction with a 24/7 Security Operations Center (SOC). Each Cegedim Group subsidiary has its own internal security organization.

Internal awareness

Anyone who uses the Cegedim Group information system is regularly informed of security best practices and the regulations that apply to their business activities. Information sessions devoted to security may take place in person or remotely, for example via an e-learning course or webinar. Subsidiaries are free to raise awareness of issues specific to their activities, in addition to the actions carried out at the Group level.

Secure data collection

Personal data

In the course of our business activities, we collect individuals' personal data. Cegedim implements state-of-the-art security measures to ensure an adequate level of protection. We collect data in a manner consistent with all the legal and regulatory requirements that apply in each country in which the Group operates, and with the contractual specifications agreed upon with our partners and clients. Cegedim Group has always made sure it complies with all applicable laws and regulations in the area of personal data protection. As soon as the General Data Protection Regulation (EU) 2016/679 was made public, Cegedim began the work needed to ensure compliance from the moment the regulation took effect.

Healthcare: a sensitive industry

The Group is well aware that it operates in a sensitive sector—healthcare—and does everything necessary to:

- minimize and/or anonymize the data it collects, particularly health data,
- host this data securely, and
- ensure that studies are conducted according to ethical standards that are frequently monitored by its clients.

High availability architecture

The Group has substantial expertise in managed services, and in the management of financial flows and digitalized documents. The highly strategic and sensitive nature of these activities led the Group's IT teams to design and build equipment and architecture with a very high degree of availability. These resources meet demanding security requirements, notably for hosting personal health data. For example, we offer our clients a comprehensive private cloud service, available in either PaaS (Platform as a Service) or SaaS (Software as a Service) mode. To do so, we draw on our hosting capacities and implement Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP).

Data accuracy and quality

Data accuracy and quality are indispensable if Cegedim Group wants to continue to deliver tools and services that meet our clients' needs, thereby contributing to the healthcare systems of the countries in which it operates. The Group's GERS Data subsidiary supplies anonymized data and analysis made possible by a unique mass data collection system covering almost seven years. The data's representativeness is achieved by collecting from a variety of sector players. The R&D teams dedicated to this activity make it possible to collect, structure, and generate databases that can be used immediately, contain quality data, and comply with all personal data protection regulatory requirements. Apart from the quality of the data, Cegedim Group is also keenly aware of its societal value, given that its databases are used by healthcare professionals to help them diagnose patients and provide them with the correct medicines.

Databases

The Group's real-life patient and prescription databases, which have been chosen by the French and UK health authorities, contain anonymized data collected by a permanent network of nearly 3,000 private practitioners, primary care physicians, and specialists. The databases have a European structure and record over a billion medical procedures: patient and prescriber profiles, diagnoses and illnesses, prescriptions and treatment plans, reimbursements, and results of certain tests. The Claude Bernard Database of medicine and healthcare products helps make the entire medication chain to the point of fulfillment safer, and it allows users to offer patients high quality advice. The database is used daily by healthcare professionals in France and around the world.

Data protection

Data protection

Protecting personal data has always been a key concern for Cegedim Group. Our data protection policy reflects the Group's commitment to respecting these principles, and we regularly raise employee awareness of the issue through:

- training sessions on data protection and security delivered by e-learning, webex, or in person depending upon the subject matter and the employees' needs,
- the Information Systems Security Charter,
- the Group Ethics Charter.

Cegedim sets rules and devotes adequate resources to ensure that equipment and information are handled in a manner consistent with their level of sensitivity. For example, equipment used to host confidential data is subject to heightened security measures, such as restricted access and data encryption. All users must apply the security rules that correspond to the category of information—published or not—that they handle as part of their job.

HDS (medical records hosting) certification

Cegedim Group has earned HDS (medical records hosting) certification from the government's digital health agency, ASIP Santé.

- Cegedim SA is certified to host the personal health data collected via the personal health data management applications supplied by its clients. This service allows patients direct access to hosted apps. This certification covers the production site and the backup site, which are the HDS units of the relevant datacenters.
- Cegedim.Cloud is HDS-certified for "Physical Infrastructure Hosting" and "Managed Services Hosting" activities, i.e. all activities 1 through 6 of the HDS reference guide.

End of life of equipment

The Group has specific measures governing equipment disposal to ensure that data cannot be recovered. These measures also apply to any equipment that might contain confidential information. Old equipment that is not going to be physically destroyed must undergo high security formatting before it is reused or returned. Paper documents that are confidential or classified for internal use only are shredded.

Copyright laws and Intellectual property rights

Our internal procedures aim to ensure that the Group and its employees do not break any laws regarding the copyrights of other companies, organizations, or individuals (patents, licenses, copyrights, trademarks, etc.). These measures also ensure respect for data confidentiality and integrity.

Management of intellectual property rights is governed by the IS Security Policy, contracts, and the security charter. Cegedim regularly informs its information system users about the rules that apply to intellectual property, notably via in-person and e-learning training sessions. Licenses are monitored as part of the configuration management process.

Personal data protection policy

The personal data protection policy was updated in 2018 when the GDPR came into force. It describes the general measures Cegedim Group takes to ensure adequate protection of the personal data it processes, either directly or through its outsourcing activities.

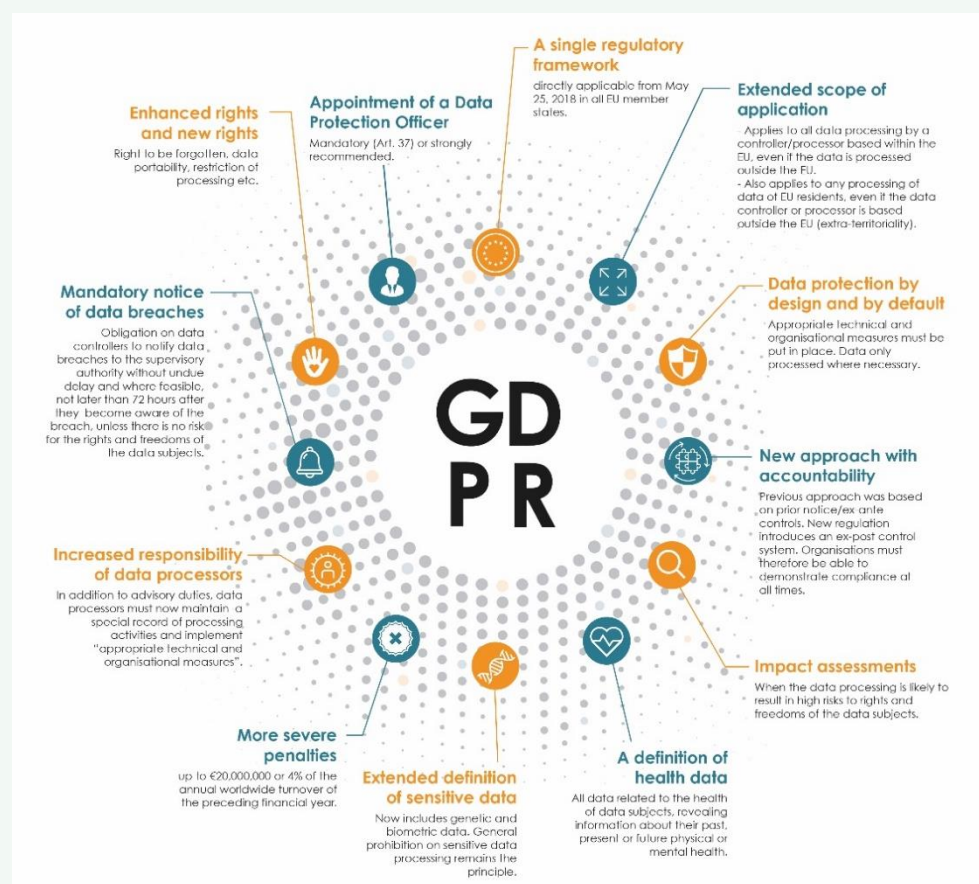
The policy applies to all Group subsidiaries in France and internationally, and to all data processing activities in which it engages. It lays out the guiding principles with respect to data processing: adhering to stated goals, proportionality and fairness, relevance and minimization, storage, security, accountability, rights of access and correction, respecting the legal data processing regulations.

Before the GDPR took effect in May 2018, the Group trained all its employees using an e-learning module and then tested them on what they had learned.

We have an e-learning program on specific data protection topics to supplement the initial training.

Considering the diversity of its business activities, Cegedim Group has decided to appoint Data Protection Officers (DPO) for every entity and business unit. They inform and advise the individual or subcontractor responsible for data processing and any employees involved in data processing. They also monitor compliance with the GDPR and bylaws, guide the actions of the head of processing, provide advice when asked about impact analyses and verify that these are conducted. DPOs also act as the point of contact for and cooperate with the National Commission for Computing and Civil Liberties (CNIL), France's GDPR supervisory authority.

GDPR in twelve points



RESULTS

Data

2019 | 2018

36,011 | 35,257

gigabytes⁽¹⁾ of health data processed⁽²⁾

(1) A significant technological change made to one platform reduced the amount of storage space needed by c.1,700 GB.

(2) Data is processed in accordance with applicable regulations, notably those covering personal data and health data, and as defined by the GDPR.

OBJECTIVES AND KEY PERFORMANCE INDICATORS



Completion of the security checklist

2019 | 2018
100% | 100%

Securing our information systems

We completed all of the items on the security checklist below.

Objective

maintain at 100%

Cegedim.cloud systems security checklist	2019
Raise awareness (training, e-learning, anti-phishing campaigns, etc.)	<input checked="" type="checkbox"/>
Regular security committee meetings	<input checked="" type="checkbox"/>
Internal audits	<input checked="" type="checkbox"/>
External audits	<input checked="" type="checkbox"/>
Risk analysis	<input checked="" type="checkbox"/>
Vulnerability audits	<input checked="" type="checkbox"/>
Penetration tests	<input checked="" type="checkbox"/>
DRP tests	<input checked="" type="checkbox"/>
Information System Security Policy review	<input checked="" type="checkbox"/>
Information System Security Charter signed by new employees	<input checked="" type="checkbox"/>



Increase in the volume of hosted data⁽³⁾

(3) Hosted data refers to the data stored in our datacenters and may include both processed data and raw, unprocessed data

2019 | 2018
+52% | +39%

French and US datacenters

Data volumes grew because existing clients experienced organic growth and because we acquired new clients.

Objective

Contain the growth in volumes relative to growth in the amount of data.

6.6 Limiting our environmental footprint

Corporate citizenship

At Cegedim, the tangible outcomes of our citizenship efforts reflect our ongoing desire to ensure that innovation benefits our stakeholders.

. Reducing our environmental footprint

Carbon footprint

We measure our greenhouse gas footprint in terms of the electricity we need to run our businesses efficiently. The Group's datacenters in France account for a significant share of its electricity consumption. Since 2018, the Group has been able to measure the carbon footprint of its hosting centers.

As providers of services for health professionals and the pharmaceutical industry, our activities are office-based. Our CO2 emissions are commensurate with those of standard office activities. Our primary carbon footprint is generated by company cars and air-conditioning systems, while our secondary carbon footprint mostly stems from energy consumption and business travel.

Fleet management

Our company car policy specifies what type of cars our employees may use and who is eligible for one. Fleet management takes into consideration vehicle age and changes in pollution standards, and respects official and industry recommendations. In France, Cegedim also has a code of conduct for company car users. Our fleet consists of hybrid vehicles and when employees replace their cars, they are strongly encouraged to choose the most carbon-friendly categories. The WLTP standard for calculating CO2 emissions, whose adoption has been postponed until March 2020, affects the criteria used to manage the vehicle fleet and its impact will be visible in the 2020 indicators.

Some sites encourage the use of alternative energies and transport methods, for example with EV-only parking spaces with charging stations, bicycle parking with charging stations for e-bikes, and solar-powered parking lot lighting.

Limit business travel

We are particularly careful about business travel because it is a large source of carbon emissions. The travel policy we implemented as early as 2008 includes specific rules and best practices for meetings and related business travel and encourages employees to cut back on their travel and use alternative, less polluting solutions without reducing the quality of the services offered to customers. Travelling to attend in-house meetings is restricted and any exemption requires prior approval by two management levels.

We introduced remote work technology as early as 2007 and encouraged our employees to reduce short-distance travel and instead use videoconferencing, telephone conferencing, instant messaging, and document exchange platforms. As well as improving quality of life, working from home also reduces the daily journeys made by our employees.

When employees from multiple sites need to attend a meeting that is nearby or in the same region, they are encouraged to travel by bus or carpool.

Waste management

Cegedim Group has no industrial activities and does not produce toxic waste. Paper, cardboard and computer equipment make up the bulk of our waste. The only hazardous and dangerous substances we use are:

- IT hardware (screens, batteries, printers, and photocopier ink cartridges),
- Car equipment (batteries, engine oil),
- Cleaning products.

Several of our subsidiaries have already introduced recycling programs for printers, photocopier ink cartridges, and computer hardware.

When computer equipment in our data centers reaches the end of its life, it is disposed of in an eco-friendly way. This type of waste is usually collected by the supplier providing the new replacement hardware. Otherwise, it is given to a specialized recycling company. We also sometimes decide to keep some equipment for spare parts, thus optimizing the life cycle of certain components which are recycled on-site.

In France, Cegedim outsources the management of all its waste electrical and electronic equipment (WEEE) to ensure that the materials are recycled, and the toxic components are correctly disposed of.

The only wastewater produced by our activities is domestic.

Using less resources

Less printing

Reducing the number of documents printed by employees is also an important goal for the Group. In all countries, teams are routinely encouraged to consider whether they truly need to print their documents or whether there are simple alternatives at their disposal (e.g. projecting information for a meeting on a screen rather than printing it out, only printing out emails when necessary, two-sided printing, etc.). There are fewer individual printers being used by employees, who instead send their documents to a shared printing station. This reduces printing simply for convenience's sake and helps save consumables by encouraging black-and-white printing over color printouts. We also have a modern, efficient in-house print and copy center that handles bulk printing for our Boulogne-Billancourt sites.

In addition, in 2018, the Group made the switch from paper to electronic greeting cards.

Printed distribution of mandatory regulatory information

In 2007, we decided to distribute our mandatory regulatory information electronically. Between 2009 and 2017, we also reduced the number of printed copies of our Registration Document, cutting the French version more than tenfold and halving the number of English copies. Now, we only print 100 copies in each language. For the last ten years, the Registration Document / Universal Registration Document has been printed on 100%-recycled, European Ecolabel-certified paper.

Digitized administrative processes

We decided early on to digitize administrative processes for new recruits in France and no longer send out mass mailings of paper documents in France. All contractual documents (letter of appointment, work contract, bylaws and charters, mutual health and personal protection insurance policies, etc.) are sent by email and signed electronically by both parties. We have also introduced meal cards, which avoids printing and handling meal vouchers.

Digital vault

In a bid to reduce printing, we also offer our employees in France a secure digital vault service where they can store private, sensitive e-documents, which limits the need for paper copies. For example, in France, employees can have their monthly payslip deposited automatically in a digital vault for storage.

Energy in the workplace

We have introduced simple ways of reducing energy costs on a case-by-case basis. For example, we encourage car-pooling and the use of shuttle services, we have installed time switches that automatically turn off the lights and air conditioning after hours, coffee machines with inline water filters, electronic timers, automated hand-driers, water fountains, etc.

We also have maintenance contracts for our air-conditioning systems to ensure optimum performance. Most systems can shut off automatically if windows or loading dock doors are opened.

Management of IT equipment

For over thirty years, Cegedim has designed, built, and run its data centers and technological platforms with a focus on maximum energy efficiency. This approach makes both financial—it's a highly competitive market—and environmental sense. Environmental, energy, and financial concerns are factored in at every stage of a data center's creation—in its design, deployment, and operation. These issues are incorporated into every aspect of information systems hosting.

Constantly improving our IT hosting services' energy-efficiency

Several years ago, Cegedim launched a program to continuously improve energy reduction for its IT hosting services. Efforts focus on three main areas.

Virtualization to ensure optimal use of IT resources: this process continues to significantly boost efficiency. In 2019, the number of physical servers stabilized, while the number of virtual machines (which have much higher per-unit efficiency rates) grew. The use of oversized servers also increases the ratio of shared services and optimizes energy consumption during periods of low activity.

Reducing server and IT equipment energy consumption: after updating our main computer hardware and then simplifying our computer network topology, in 2019, we maintained our performance and energy-efficiency. The overall standard of our services has not been affected, and data security and secure access remain top priorities.

Optimizing the efficiency of data center air conditioning systems: we successfully installed more environmentally-friendly air conditioning systems in all our data centers. In 2019, we continued to install cold aisle containment solutions in our data centers in France, and the expected improvement is still being felt. The installation of free cooling—a cost-effective method that uses the temperature difference between the air leaving the computer hardware and the ambient air—has helped reduce air-conditioning energy use in one of the French data centers since 2017. The Toulouse-Labège site collects rainwater.

Green IT and Datacenters

The 2019 roadmap for Cegedim Group's Green IT and Datacenter program aims at improving energy efficiency and reducing environmental impact. It included a partial update of the cooling system for one of the French datacenters that cut its electricity consumption by around 12%. The 2020 plan includes, notably, the creation of a solar farm; installation of heat pumps and waste heat recovery; and management of heat exchangers, fan-coil units, and chilled water distribution, all aimed at obtaining C2E (Energy Savings Certificates) via ADEME (Agency for the Environment and Energy Management).

Contributing to regional development

Corporate social responsibility

Cegedim's activities are to some extent inherently socially responsible. We provide services for health and insurance professionals who in turn work for the welfare of their patients and the best interests of their policyholders. Our corporate services (HR and e-services) also have a social purpose, notably by reducing paper usage and by hosting and supplying information. The context in which we operate is currently one of rising health expenses, growing patient expectations, challenging technological transformation, and changing regulations.

Local impact

We monitor the local impact of our activities, in terms of both employment and regional development. We have operations in more than ten countries. New employees are typically hired locally, which helps to boost the local economy.

Local jobs

Cegedim's compensation policy is fair and equitable and we aim to offer a competitive wage in line with labor market practices in all the countries where we operate. Employees are typically hired locally, and we make sure that our operations make a positive contribution to the countries where we are present. We also comply with all local legislation, including laws governing compensation, and respect ILO conventions 100 and 131. The Human Resources department ensures that this principle is applied in each country.

Our international mobility policy ensures that employees retain their health and personal protection benefits while on assignment abroad and includes the necessary provisions for their return or repatriation.

Subcontracting

In France, subcontracting is regulated by centralized agreements, while in other countries, subcontracting agreements are managed locally. Cegedim also subcontracts part of its activities to its own subsidiaries, to ensure that the quality and safety standards it requires are applied. For example, some specific IT support or back-office services are provided by its subsidiaries in Morocco and Romania.

Digitalization and regional development

Some services offered by Cegedim in France also help solve regional development—or desertification—issues and, what is more, digitization is an eco-friendly solution. The Sesam-Vitale data transmission tools, where Cegedim is the leader in France; the development of Docavenue/Maiia's remote medical consultations, enabled by regulatory changes in 2018; the digitization of patient medical records for preventive health care; the European strategy for convergent and integrated healthcare: all these measures reduce our customers' environmental footprint and are designed to improve coverage of territories with a low number of doctors per capita. It is estimated that in France over 5 million people no longer have access to medical treatment close to home. Physician density has shrunk about 10% on average in the last ten years, and by over 20% in a dozen French departments. This is a critical social issue and Cegedim intends to be one of the major players providing suitable, high-quality solutions for the French government's healthcare system reform, dubbed MaSanté 2022.

Giving back to the community




We encourage giving back to our local communities in all the countries we operate in. Cegedim subsidiaries organize initiatives at their discretion. For example:

- Galerie d'Aguesseau, the art gallery in our head office building in Boulogne-Billancourt, exhibits the work of about ten artists a year and regularly promotes local artists;
- Since 2016, Cegedim Insurance Solutions has sponsored "Les Foulées de l'Assurance", charitable races (5 and 10 km runs or an 8 km walk) which raise funds for the prevention of cardiovascular diseases;
- Several subsidiaries have supported charitable organizations, contributing to food drives to support the victims of natural disasters (floods, etc.) and supporting local cultural and sports nonprofits;
- Futuramedia and C-Media helped Établissement français du sang (EFS), the French blood agency, and Restos du Cœur, which delivers meals to the needy, broadcast their digital campaigns in 2019. They ran digital ads free of charge on their vast network of over 7,000 screens and more than 800 digital window displays in over 1,800 pharmacies and health and wellness stores throughout France;
- Cegedim joined the fight against cancer in 2017 when it partnered with the Institut Gustave Roussy. In 2019, it supported the Gustave Roussy Foundation's "Cure childhood cancer in the 21st century" campaign, and C-Media ran an "United against cancer" ad campaign in pharmacies;
- Since 2014, Cegedim Outsourcing is a partner with the city of Meudon of the First Lego League annual robotics challenge for kids aged 9 to 16. This event aims to get youngsters interested in science and technology: computer programming for sustainability, animal protection, or renewable energies;
- Cegedim Insurance Solutions is a partner of Nos Quartiers ont des Talents, a nonprofit which helps young graduates find jobs or internships through a network of companies committed to promoting equal opportunities and youth employability. University graduates under the age of 30 from humble backgrounds or priority neighborhoods are mentored by experienced working managers, and even senior executives.

RESULTS

Greenhouse gas emissions 2019 2018	Use of resources 2019 2018	Community measures 2019 2018
1,365 1,777 metric tons of CO2 equivalent generated by our electricity consumption	13,753 15,584 of electricity consumed in kWh	10 11 Number of countries where Cegedim is present
303 360 metric tons of CO2 equivalent generated by our gas consumption	1,246 1,478 of gas consumed in kWh	69 71 Number of sites where the Group is present
896 856 metric tons of CO2 equivalent generated by air travel in France		57 53 Number of local sites in France
2.35 2.40 is the average age of our French car fleet		12 18 Number local offices outside France
€0 €0 Provisions and guarantees for environmental risks		481 416 Number of mobile workers in France

OBJECTIVES AND KEY PERFORMANCE INDICATORS

	% vehicles emitting <120g CO2	2019 2018 79% 79%	Company car fleet in France The fleet of passenger vehicles is being updated with newer cars, fewer diesel engines and more gasoline-powered cars and electric hybrids.	Objective Maintain at ≥ 75%
	% vehicles emitting <140g CO2	2019 2018 92% 93%	Company car fleet in France Several large utility vehicles were replaced in 2019, which had an impact on the category's overall performance.	Objective Maintain at ≥ 90%
	Increase in number of virtual servers	2019 2018 +11% +12%	Server virtualization We continued to replace physical servers with virtual machines in 2018, and now have 15 virtual servers for every 1 physical server.	Objective Maintain continuous growth

6.7 Upholding our reputation

Our goals

We aim to provide our customers with the added value they require at the right price. We react fast and adapt to change easily because we keep our teams relatively small so they can communicate, pass on expertise and share experiences easily. We function with efficient, responsive, motivated teams; short communication channels; and rapid decision-making.

Certified expertise

Security management

Cegedim has obtained certifications guaranteeing the quality of its security management expertise and upgrades. Cegedim IT, a Cegedim group subsidiary that houses all the Group's IT resources (both human and material resources), rolled out and operates an ISO 27001-certified data security management system for our data centers in France, our data and app hosting activities, and our managed services.

Quality and internal control – ISAE 3402

Since 2012, Cegedim has employed quality and internal control procedures in accordance with the ISAE 3402 (International Standard on Assurance Engagements) Type II standard, which is reviewed annually. This standard, which stemmed from the United States' Sarbanes-Oxley Act (SOX), requires the suppliers of companies applying it to be audited for financial risks too. The examination is carried out annually by a third-party auditor recognized by the Auditing Standards Board of the American Institute of Certified Public Accountants. The following companies and activities have earned the ISAE 3402 Type II standard:

- Cegedim.cloud for all its activities,
- Cegedim Activ' for its SaaS, managed services, and technical hosting activities,
- Cegedim SRH for all its activities,
- CETIP for all its activities,
- IGestion for all its activities.

Standards and certification ISO 27001

Cegedim also applies several international standards, like ISO 27001, the information security standard; ISO 20000/ ITIL, the IT service management standard; ISO 9001, the quality management standard; and CMMI, the project management and software development program. The following companies and activities earned certifications:

- ISO 2700, 20000, ISO 270171, ISO 27018 for Cegedim.cloud's hosting and managed services at the data centers based in France,
- ISO 27001 and ISO 20000 for Cegedim Activ's SaaS, managed services, and technical hosting activities (France),
- ISO 27001 for pharmacy IT supply, support, and maintenance services at Cegedim RX (UK),
- ISO 27001 for healthcare industry IT supply, support, and maintenance services at INPS (UK).

HDS accreditation and certification

Cegedim has obtained the following certifications to host personal health records:

- HDS certification to host personal health records (I) in France.

Aiming for operational excellence

Research and development

Cegedim devotes a large share of its resources to innovation and Research & Development. Our efforts in this area represent a significant—and growing—share of both revenue and human resources. This proactive policy allows us to offer our stakeholders products and infrastructures that meet the latest quality, security, and environmental standards and requirements.

We have set up a virtual pharmacy at one of the Boulogne-Billancourt sites to showcase Group products and innovation to both our clients and employees.

OPEX (Operational Excellence)

The OPEX (Operational Excellence) department is responsible for the information systems security policy. Every year, it defines the general security objectives for the Group and its subsidiaries, in agreement with senior management. It monitors the implementation of measures required to meet the security objectives at monthly Group security committee meetings.

Product certification

Cegedim Group products enjoy a variety of certifications and accreditations specific to the countries, regions, and industries in which they are sold. In France, these include SesamVitale, HAS, DMP, LAP, TlSi, and e-santé (CDS/MSP); in Belgium, EHealth / CIN; in the UK, NHS, EMIS, TPP, MHRA, NMVS, and Research Ethics; and in the US, Rx and DEA. These certifications and accreditations—which are regularly renewed—demonstrate that our high-quality products and solutions meet the strictest standards.

Project management

We account for security right from the start of every type of project (data processing, business, or software development). We identify security requirements when projects are initiated. If these requirements are not formally defined in writing by the customer, or in the project specifications, we apply the standard security requirements of the subsidiary or organization concerned.

Technological developments

We verify our technological developments using a process security policy, change control procedures, a technical review of applications after the changes, tests and recipes. Our environments undergo security and engineering checks that meet the highest standards.

Information systems security audits

Cegedim regularly audits the security of its information systems. Independent assessments of information security are carried out regularly within the group: internal and external audits, certification and customer audits, and vulnerability checks. These audits are conducted in such a way as to safeguard the independence of both the auditors and their findings.

Synergies and internal optimization

We manage our workforce using our own human resources and skills management tools and services. Our SRH subsidiary, which specializes in outsourced HR management, offers a range of solutions and services, from payroll management to employee management, with its Smart RH offer. Its TeamsRH platform is a complete, modular tool with a wide range of functions that meet the needs of every organization: payroll and personnel administration, HR portal, HR monitoring and decision-making, career and skills management, time management, etc.

Reputation and external communication

We care deeply about our image and reputation. Only employees with delegated authority may communicate on the Group's behalf about its activities, products, partners, and suppliers. This applies to both traditional media (press, websites, radio stations, etc.) and social media. This issue is covered in full in the Ethics Charter, which also informs our employees about the need to use social media responsibly and respectfully.

Practicing continuous improvement

Service Management System

Providing top quality products and services to our clients and partners is a cornerstone of our strategy. To maintain this level of excellence, Cegedim Group is committed to a continuous improvement policy.

To maintain its high quality standards, Cegedim.cloud takes a process-based approach using a Service Management System. This approach is based on the ISO 20000 standard, which is in turn based on the ITIL best practice framework. It also includes Capability Maturity Model Integration (CMMI) principles for engineering and project management. This system is applied to data and application hosting, and infrastructure management services, and is run according to the principle of continuous improvement.

Risk assessment

The risk assessment conducted by Cegedim IT and Cegedim Activ' as part of the ISO/IEC 27001: 2013 certification process is based on the EBIOS 2010 method of France's cybersecurity agency, Agence Nationale de Sécurité des Systèmes d'Information (ANSSI). It identifies and rates the security risks to the availability, integrity, confidentiality, and auditability of the subsidiary's information and draws up a risk treatment plan, if required. Security risk assessments are also conducted for projects in our subsidiaries. The level of detail and the methods employed in these assessments depend on the project's sensitivity and the security requirements expressed at its onset.

Managing suppliers

The IT supplier management process is part of Cegedim IT's Service Management System. It guides relations with suppliers and monitors their performance for the duration of the relationship. Suppliers are assessed according to the quality, innovation, security, and cost of the service they provide.

In compliance with current regulations, we also assess our non-IT suppliers. The Group Procurement department conducts annual reviews of critical suppliers, which include both central and Group entity suppliers.

Continuous improvement

As part of its policy of continuously improving information systems security, Cegedim pledges to investigate any weakness in the system reported by employees, clients, or third parties via the dedicated email address: security@cegedim.com.

Because the Group's business is growing, there has been a significant increase in the amount of data hosted and processed, which has inflated volumes and increased the need for storage capacity. Apart from financial considerations, the Group's R&D efforts focus on how it can responsibly manage this growth while minimizing its resource usage and environmental impact. As a result, while the amount of data hosting and processing will increase, growth in data volumes can be expected to slow as the Group finds ways to better compress and manage these volumes. If successful, these efforts will be reflected in the indicators and results reported on this topic.

RESULTS

Certifications	Continuous improvement
2019 2018	2019 2018
77 79 Group products with certifications	336 - R&D e-learning licenses
	2,687 - Hours of R&D e-learning

OBJECTIVES AND KEY PERFORMANCE INDICATORS

	R&D effort relative to revenues	2019 2018 12.3% 12.5%	Group research and development The R&D effort refers to payroll expenses for R&D staff as a percentage of revenues over the past 12 months. This percentage, while not a targeted figure, was stable compared with previous years.
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6.8 Behaving ethically

Our commitment

Cegedim has committed to respecting the ten principles of the UN Global Compact, the principles of the 1948 Universal Declaration of Human Rights, and the International Labor Organization's fundamental conventions. Cegedim complies with business laws and regulations and conducts all its activities honestly and fairly, in accordance with the highest ethical standards.

Jean-Claude Labrune, Chairman and CEO of Cegedim, has said that for sustainable growth and harmonious development to work, everyone must commit to behaving ethically.

Embracing the Ethics Charter

Our principals

For us, complying with the law goes beyond observing regulatory requirements and avoiding legal sanctions—it is an ethical issue. Ethics is a matter that concerns the behavior of all our employees worldwide, at all levels of the company, with no exceptions. It also concerns the behavior of all corporate officers and members of the executive and management committees of Cegedim Group and its subsidiaries worldwide.

The Ethics Committee

The Ethics Committee comprises five permanent members: Aude Labrune (Director of Group Communications and Chairman of the Committee), Anne-Louise Senne (Director of Group Human Resources), Sandrine Debroise (Chief Financial Officer of the Group), Christelle Vivet (General Counsel), Jan Eryk Umiastowski (Chief Investment Officer & Head of Investor Relations). The Ethics Committee meets as often as necessary. In 2019 it met twice, on May 9 and June 28. Its work focused on making the alert line more efficient and formalizing the procedure, and on the e-learning program for the Ethics Charter, notably with respect to topics related to the Sapin II Act.

Group employees may report any concerns regarding Group practices to the Ethics Committee. In 2019, the Ethics Committee received a tip that it investigated and dealt with, although the tip did not lead to an alert.

The Ethics Charter

The Group's Ethics Charter was updated at the end of 2017. It is available in the Group's seven spoken languages: French, English, Spanish, Romanian, Dutch, German, and Italian. It reaffirms our ethical commitment and factors in new laws and regulations on business conduct. The new version is hands-on and instructive and includes concrete examples. The Charter aims to inform and protect Cegedim's employees by setting out the Group's ethical standards and related codes of conduct. It is also available to the general public on the Group's website.

The Ethics Charter is given to all new recruits. When it is updated, the latest version in French and English is emailed to every employee and a hard copy is sent to Cegedim Group's Business Directors, board members, and senior executives. These people promote the values and commitments of this Charter among their employees and ensure that they are upheld.

An e-learning program was created with specific modules for training employees on the Ethics Charter. The first module, launched in 2019 for employees in France, covers topics from the Sapin II Act—confidential information and equal treatment of suppliers. The international launch will take place in early 2020. All new hires take this e-learning course as part of their onboarding process.

Human rights

Cegedim is present in many different countries and keeps an eye on local conditions, particularly regarding respect for human rights and corruption. We pay close attention to the reports published by organizations like Transparency International and Human Rights Watch, so we can identify risks and potentially sensitive issues. We also endeavor to defend and respect fundamental human rights, and all charters and policies pertaining to those rights are respected on our premises. We also comply with the laws of our host countries. All Group employees, including those in countries most at risk, may use the ethics hotline to confidentially report any difficulties, both inside and outside the company.

Fighting corruption

We are committed to fighting corruption in all its forms and actively apply the relevant portions of France's Sapin II Act. Bribery is forbidden in all the countries where we operate, and extra precaution is used when representatives of public authorities are involved. We have a zero-tolerance policy on corruption, and this includes facilitating payments, i.e. payments made to complete or expedite certain administrative formalities.

Fighting tax evasion

Cegedim faithfully reflects its operations in its accounts and communicates independently and completely transparently about its performance. Cegedim is committed to ensuring the simultaneous, effective, and complete dissemination of financial information that is relevant, accurate, detailed, and truthful in a manner that is timely and consistent with previous publications. We have implemented internal procedures to ensure that our employees work for clients with lawful activities and no financial links to criminal or illegal activities. We also hire a French tax specialist that systematically verifies sensitive operations, and our OECD-compliant price transfer and margin rate policy, to ensure that we respect best practices and current French tax regulations. Cegedim Group does not have any legal entities (companies, subsidiaries, or representative offices) in countries on the list of Non-Cooperative States.

Being a responsible company

A responsible company

Cegedim applies local laws in all the countries where it operates and has taken steps to ensure that it complies with their requirements, particularly regarding corporate social responsibility. In all its host countries, Cegedim respects the principles of the International Labor Organization's conventions (nos. 29, 100, 105, 131, 111 & 138). Management applies these principles and the Human Resources department teams enforce them.

Fair trade practice

We place great importance on choosing our suppliers fairly. They must comply with the principles stipulated in our Ethics Charter and make sure they respect the same principles with their own suppliers and subcontractors. If they do not, Cegedim reserves the right to re-examine and possibly terminate the relationship, in accordance with the law.

Our employee ethics training and awareness raising program includes an e-learning module on issues pertaining to competition law and the fair treatment of third parties in our commercial relationships. These issues are part of the e-learning course developed by our Legal Department, which continued to roll it out in 2019.

Digitalization

Some of Cegedim Group's products and services serve a social purpose. These notably include the digitization of management documents, since our efforts help companies automate processes from ordering to payment, including invoicing. Cegedim e-business (SY), a process automation and digitalization specialist since 1989, designs, develops, and markets invoice digitization, probative value filing, and EDI offers in Europe and the rest of the world. These offers are supplemented with electronic signature and business process digitization tools, as well as a digital vault which enables electronic documents to be stored with probative value.

Sustainable procurement and consumption

Office supplies

We encourage our employees to purchase eco-friendly office supplies, as long as the price is reasonable. We prefer to use "Ecolabel" recycled paper or paper from sustainably managed forests, especially for bulk printouts. We have streamlined our purchases and prefer to source our office materials from referenced suppliers who offer a catalogue of selected supplies. These suppliers must meet ISO certification standards and respect our ethical, environmental, and traceability standards.

Sourcing

We take care to buy our promotional items and branded merchandise from suppliers that are also committed to sustainable sourcing and work with certified companies and manufacturers, particularly for clothing items. The company that prints the invitations for our 50-year anniversary events and our main supplier of promotional items are both social enterprises that employ disabled people.

Telephone policy

Our telephone policy also factors in sustainability concerns. We purchase double-SIM mobile phones—so our employees can use the same device for both personal and professional purposes—with low SARs. We also plan to replace our landlines with VoIP solutions. All our telephones are recycled at the end of their lives. As part of a wider effort to streamline our sourcing, the mobile devices we offer our clients in package deals are the same ones we offer our employees.

Food waste

We only purchase food for our meeting rooms and do so occasionally and in very small quantities. We avoid food waste by consistently ordering limited amounts (of water and food) in individual portions and by carefully managing our stocks.

Waste management and Recycling

Certain sites have adopted waste prevention and management practices, notably for paper, cardboard, plastic bottles, and coffee pods. Cegedim Group is currently working to standardize best practices, notably for sorting and collecting recyclables from offices, and has set a target of adopting them Group-wide in 2020.

Local teams responsible for site services also encourage more responsible behavior and initiatives. For example, ink cartridges, batteries, and light bulbs are widely recycled throughout the Group and many of our subsidiaries increasingly choose to recycle their paper waste. Drink dispensers use recyclable cups, and new hires receive a reusable mug when they arrive. Filtered water fountains are increasingly common at Group sites, which helps employees limit their use of disposable containers.

RESULTS

Sustainable procurement	Digitalization
2019 2018	2019 2018
100% 100% All the paper and envelope products listed in the Group catalog in France, office supplies, Copy center and mandatory regulatory information are eco-certified	81% 78% of employees in France receive digital payslips

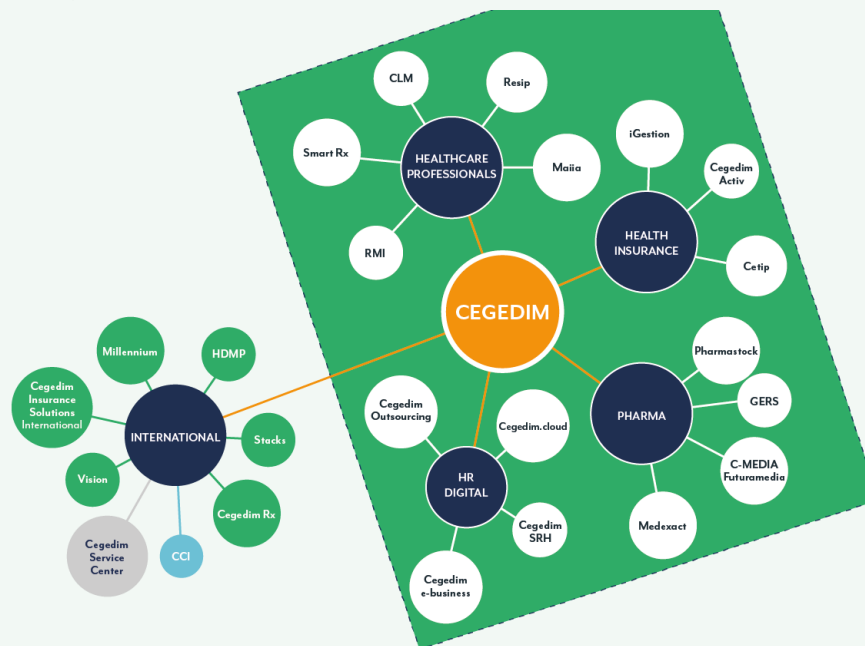
OBJECTIVES AND KEY PERFORMANCE INDICATORS

	Number of Ethics Committee meetings	2019 2018 2 2	Ethics Committee The Ethics Committee met twice in 2019, in May and in June. No incidents were reported to the alert line.	Objective Although meeting frequency depends on the topics on the agenda, the aim is to meet at least once every six months.
	Share of eco-friendly purchases	2019 2018 49% 48%	Office supply purchases Purchases of office supplies in France are centralized in a Group catalog that highlights eco-friendly products from a supplier with a sustainability policy.	Objective Over 50% of purchases should be eco-friendly moving forward.

6.9 Methodological note

Scope of consolidation

The information contained in this report concerns the whole of Cegedim Group, i.e. the parent company and all its fully consolidated subsidiaries, unless a different scope is expressly stipulated. In general, the comments are more detailed and the illustrations more numerous for the French companies, which represent 68% of the total Group workforce. Unless otherwise specified, the human resources figures are for all the fully consolidated companies worldwide, i.e. 70 companies.



Information sources

In order to ensure the consistency and reliability of the indicators monitored in all its entities, the Group has developed shared human resources and environmental reporting tools. They include methodological instructions and definitions to ensure that the questions are clear and the answers comparable.

The human resources figures were collected using the TeamsRH worldwide database developed by the Group. This database enables workforce data as well as other human resources information to be monitored in each country. It meets the security and confidentiality requirements and is compliant with the data collection and processing laws of each country, which are strictly observed. It is updated daily by the Human Resources teams in the Group's various subsidiaries.

The other quantitative data is collected via a questionnaire that is included in the annual consolidation package and is completed by each of the consolidated subsidiaries.

Data relating to external suppliers is also used, notably statistics from travel agencies relating to CO2 emissions, and invoices and annual reviews prepared by energy suppliers that show the energy consumption in kilowatt hours.

The qualitative information in this report is based on interviews with the managers from the relevant departments, both at the Group's head office and in the subsidiaries (notably in the Human Resources, Information Technology, Operational Excellence and Finance departments).

A questionnaire is sent to each country in which the Group operates and completed under the local Financial Director's responsibility in the consolidation software. It can be completed—one questionnaire per country—until the closure of annual accounts. The survey's purpose is to assess how much is known about the Group charters and whether their measures are applied. It is also used to provide qualitative information on foreign subsidiaries' best practices and initiatives regarding human resources, environmental, and social issues. If need be, additional interviews may be conducted based on the responses.

Reporting period	<p>The information in this report covers a 12-month period from January to December 2019. The only exceptions are the energy consumption indicator, which is based on a rolling 12-month period with a maximum difference of two months on the previous fiscal year.</p>
Methodological explanations and limitations	<p>The methods used for some of the indicators may have limitations due to:</p> <ul style="list-style-type: none"> – The lack of nationally and/or internationally recognized definitions (for example, for the different types of employment contract); – The need to use estimates, the representativeness of the measurements, the limited availability of external data needed for the calculations; – The practical and legal methods of collecting and entering data (for example, storing information about employees' age or gender may be forbidden in some countries). <p>Where necessary, the reporting scope and completeness of the measurements for some indicators were adjusted. This is indicated in the report. Notably:</p> <ul style="list-style-type: none"> – The information needed to calculate the frequency and severity of work-related accidents could not be collected across the Group. The number of work accidents is nonetheless provided; – CO2 emissions only relate to business travel by airplane in 2019 of French entities; – Electricity and gas consumption in kilowatt-hours refers to the entities established in France, Morocco, Romania and UK. These countries represent more than 94% of the Group workforce. It also includes establishments for which the data is available (Chile and Germany). A marginal number of premises are excluded since their utility costs are included in the rent and do not significantly affect the published information. – Because the 2019 update to ADEME's guidelines was not available when this document was written, we used the 2018 formula to convert electricity and natural gas usage into their CO2 equivalents. <p>The Group intends to continue to gradually expand the scope of these indicators to a larger number of countries and to other sources of emissions.</p>
Non-applicable indicators	<p>Given the Group's activities, the following indicators are not considered to be applicable:</p> <ul style="list-style-type: none"> – Food waste; – The fight against food insecurity, respect for animal welfare, and ensuring fair, responsible, and sustainable food sources.
Consolidation and internal controls	<p>The data are consolidated under the responsibility of the Human Resources and Internal Control departments at the head office of the consolidating entity. An initial validation of the data is carried out by the persons responsible for collecting it. Consistency checks are then carried out by the Human Resources and Internal Control departments when consolidation takes place. These checks include comparisons with data from previous fiscal years. Any differences considered to be significant are analyzed. Checks also include ratio analysis when data can be related to the workforce, to a business activity, or to another relevant indicator used to compare entities.</p>
External controls	<p>In order to obtain an external opinion on the reliability of the data and the soundness of the reporting process, an independent third party was asked to attest to the Declaration's conformity with the provisions of article R. 225-105.1 of the French Commercial Code and issue an opinion as to the accuracy of the information provided, i.e. policies, actions, and results, including key performance indicators relating to the main risks. Therefore, specific checks were conducted regarding the information in the report, as key indicators of the Group's Statement of non-financial performance. The independent third-party Assurance Report explaining the verification procedure, together with the auditor's comments and conclusions, is included in this statement and in the Group's Registration Document / Universal Registration Document.</p>

6.10 Report by an independent third party, on the consolidated non-financial statement included in the Group management report of CEGEDIM

This is a free translation into English of the independent third-party report issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

For the year ended December 31, 2019.

To the shareholders,

In our capacity as independent third party accredited by COFRAC (accreditation number 3-1058; requirements available at www.cofrac.fr), member of the Mazars network, and the Cegedim Group's Statutory Auditors, we hereby report to you on the consolidated non-financial statement for the year ended December 31, 2019 (hereinafter the "Statement"). This Statement is included in the Group management report pursuant to the legal and regulatory provisions of articles L. 225 102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (Code de commerce).

The entity's responsibility

Pursuant to legal and regulatory requirements, the Board of Directors is responsible for preparing the Statement, including a presentation of the business model, a description of the principal non-financial risks, a presentation of the policies implemented in respect of those risks, and the outcomes of said policies, including key performance indicators.

The Statement has been prepared in accordance with the entity's procedures (hereinafter the "Guidelines"), the main elements of which are presented in this statement or available on request from the entity's head office.

Independence and quality control

Our independence is defined by the provisions of article L. 822-11-3 of the French Commercial Code and the Code of Ethics (Code de déontologie) of our profession. In addition, we have implemented a system of quality control that includes documented policies and procedures designed to ensure compliance with ethics rules, French professional guidelines, and applicable legal and regulatory requirements.

Responsibility of the independent third-party auditor

On the basis of our work, our responsibility is to provide a report expressing a limited assurance conclusion on:

- the compliance of the Statement with the provisions of article R. 225-105 of the French Commercial Code;
- the accuracy of the information provided in accordance with point 3° of article R. 225 105, paragraphs I and II of the French Commercial Code, i.e., the outcomes, including key performance indicators, and the measures implemented with respect to the principal risks (hereinafter the "Information").

However, it is not our responsibility to comment on:

- the entity's compliance with other applicable legal and regulatory provisions, in particular the French duty of care law and anti-corruption and tax evasion legislation;
- nor on the compliance of products and services with applicable regulations.

Nature and scope of our work

The work described below was performed in accordance with the provisions of articles A. 225-1 et seq. of the French Commercial Code, with the professional guidelines of the French Institute of Statutory Auditors ("CNCC") applicable to such engagements, and as well as with ISAE 3000¹.

- we obtained an understanding of all the consolidated entities' activities and the description of the main risks;
- we assessed the suitability of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, with due consideration of industry best practices, where appropriate;
- we verified that the Statement includes each category of social and environmental information set out in article L. 225 102 1 III as well as information regarding compliance with human rights and anti-corruption and tax evasion legislation;
- we verified that the Statement provides the principal risks required under article R. 225-105 II and includes, if relevant, an explanation for the absence of the information required under article L. 225- 102- III, 2;
- we verified that the Statement presents the business model and the principal risks associated with all the consolidated entities' activities, including where relevant and proportionate, the risks associated with their business relationships, their products or services, as well as their policies, measures and the outcomes thereof, including key performance indicators related to the main risks;
- we referred to documentary sources and conducted interviews to corroborate
 - o the consistency of the outcomes and the key performance indicators used with respect to the principal risks and policies presented;
 - o the qualitative information (measures and outcomes) that we considered to be the most important presented in Annex 1. Our work concerning all the risks presented in this Statement was conducted at the parent company level.
- we verified that the Statement covers the scope of consolidation, i.e. all the entities included in the scope of consolidation in accordance with article L. 233-16 within the limitations set out in the Statement's "Methodological note";
- we became acquainted with the internal control and risk management procedures implemented by the entity and assessed the collection process designed to ensure the completeness and truthfulness of all information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important, we implemented and presented in Annex 1:
 - o analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data,
 - o substantive tests, using sampling techniques, in order to verify the proper application of the definitions and procedures and reconcile the data with the supporting documents. This work was carried out on a selection of contributing entities² and covers between 68% and 100% of the consolidated data relating for these tests;
- we assessed the overall consistency of the Statement based on our knowledge of all the consolidated entities;

We believe that the work carried out, based on our professional judgement, is sufficient to provide a basis for our limited assurance conclusion; a higher level of assurance would have required us to carry out more extensive procedures.

Means and resources

Our work was carried out by a team of three people between November 2019 and March 2020 and took a total of two weeks. We & Compliance, Human Resources and IT departments.

Conclusion

¹ ISAE 3000: Assurance engagements other than audits or reviews of historical financial information.

² French entities of the Cegedim Group.

Based on our work, nothing has come to our attention that causes us to believe that the non-financial statement is not in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

Paris La Défense, March 19, 2019/20

MAZARS SAS

Jean-Philippe Mathorez

Partner

Edwige Rey

CSR & Sustainable Development Partner

Annex 1: Information deemed to be the most important

Qualitative information (actions and outcomes) concerning the following principal risks:

- Inability to retain top talent and employees;
- Damage to infrastructures and data;
- Negative environmental impact of our activities;
- Inability to maintain high standards;
- Unethical behavior.

Quantitative indicators including key performance indicators

- Percentage of confirmed permanent contracts;
- Number of confirmed employee referral hires;
- Number of recruiting events;
- % of completion of the security checklist;
- Increase in the volume of hosted data;
- % of vehicles emitting < 120g CO2 a < 140g CO2 ;
- Increase in the number of virtual servers;
- R&D effort relative to revenues;
- Share of eco-friendly supplies listed in the Group catalog in France;
- Number of Ethics Committee meetings



www.cegedim.com/finance

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on iOS and Android
and follow us on

