



Babilou  
Family

# CHARTER OF ETHICS



## A WORD FROM THE CHAIRMAN AND CEO



“ Because the trust that families give to Babilou Family is essential to carry out our mission of supporting children in co-education with his parents, it is our shared responsibility to show us worthy of this trust by being irreproachable on a daily basis in matters of honesty, integrity and ethics.

Such conduct involves knowing and complying with all applicable internal rules and legal provisions.

The role of this Code of Ethics is to promote (correct) behaviour tailored to our care profession, respectful of our partners and online with our Grandir Ensemble project by providing a guideline for our work. We hope that the commitments made in this Charter will be of valuable assistance on a daily basis.

If there is any doubt as to the attitude to be taken in certain situations, you should seek advice and assistance from a competent person, first from your line manager, Human Resources contact or Compliance Officer by sending an e-mail to [marievictoire.barsi@babilou-family.com](mailto:marievictoire.barsi@babilou-family.com) or [marievictoire.barsi@babilou-family.com](mailto:marievictoire.barsi@babilou-family.com).

Failure to comply with this code of ethics can cause considerable harm, not only to our company, but also to ourselves as an employee. It is up to everyone to become familiar with their content, integrate it into their own behaviour and comply with them when making decisions.

We therefore encourage you to read it carefully and know how to count on you so that Babilou Family is a reference in terms of integrity.

”

**Xavier Ouvrard**  
Chairman and CEO

Founded in France in 2003 by the two brothers Rodolphe and Edouard Carle to address the lack of childcare solutions, Babilou Family has gradually grown to become a major player in the 0-12 education sector.

Today, Babilou Family welcomes over 50,000 families in 12 countries. Its 1,100 establishments and 12,000 employees make it a leading operator worldwide.





# TABLE OF CONTENTS

<b>6</b>	<b>A WORD FROM VP PEOPLE &amp; CULTURE</b>	<b>12</b>	<b>I. OUR COMMITMENTS</b>
<b>7</b>	<b>A WORD FROM CHIEF FINANCIAL OFFICER</b>		<b>Fair relationships with our customers, suppliers and other partners 12</b>
<b>8</b>	<b>A WORD FROM THE VP EDUCATION, QUALITY &amp; SUSTAINABLY</b>		Compliance with Competition Law <b>13</b>
<b>9</b>	<b>A WORD FROM THE CHIEF DIGITAL OFFICER</b>		Prohibition of acts of corruption and facilitation payments <b>15</b>
<b>10</b>	<b>PREAMBULE</b>		Gifts and invitations <b>16</b>
<b>10</b>	<b>Who is subject to this charter?</b>		Ethical or not ? <b>17</b>
<b>11</b>	<b>What is the role of everyone?</b>		Conflits d'intérêts <b>18</b>
<b>11</b>	Role of employees		Protection of sensitive/ confidential information <b>19</b>
<b>11</b>	Role of managers		Protection of personal data <b>20</b>
<b>11</b>	Role of buyers and sales people		Representing The Group <b>20</b>
			Protection of The Group's assets <b>21</b>
			Accuracy of Information - Money Laundering <b>21</b>
			Fraud prevention <b>22</b>
			<b>Babilou Family as employer 23</b>



# TABLE OF CONTENTS

- 24 Prohibition of any form of harassment**
- 25 Prohibition of all forms of discrimination and principle of equal treatment**
- 25 Well-being of children in Babilou Family's care and prohibition of abuse**
- 25** Babilou Family will not tolerate any form of abuse or mistreatment of a child.
- 26** Social Responsibility - Sustainable Development

## **27**

### **II. BABILOU FAMILY AND ITS SUPPLIERS**

- 27** Human Rights and Working Conditions
- 28** Respect for the Environment
- 28** Mutual commitment to our supplier/customer relationships

## **29**

### **III. OUR WHISTLEBLOWING PROCEDURE**

Reporting of violations of the Code of Ethics **29**



## A WORD FROM THE VP PEOPLE & CULTURE

“ *As a major player in the early childhood sector, Babilou Family places its employees at the heart of its activities.*

*We support the development of our employees by providing them with a framework and guidance that allows them to grow and achieve and thus contribute to the sustainable growth of our company.*

*The code of ethics is an integral part of our value system in that it allows us to give meaning and prioritise our actions within each geography in a conscious and thoughtful manner.*

*We are committed to respecting the principles of this code of ethics and to supporting our teams in this endeavour.*

”



**Caroline de L'Espinay**  
VP People & Culture



## A WORD FROM THE CHIEF FINANCIAL OFFICER



“ *Babilou Family is a leader in its early childhood care market, this role is accompanied by responsibilities that we are dear and values we want to share with our entire ecosystem.*

*As such, we are judged on how well we select and treat our contractual partners, how well we establish a transparent accounting framework, how well we carry out external growth operations worldwide in full awareness and responsibility of the ethical challenges of our time, and how well we manage our cash flows.*

*More generally, compliance with laws and regulations is an absolute priority when it comes to guaranteeing that all internal and external stakeholders can commit to the Group with confidence.*

*Indeed, we consider all our employees and partners to be full members of our Babilou Family and we do our utmost to develop solid and long-lasting relationships with them, in order to move forward together and achieve common goals.*

*We believe that our development and success can only be achieved with the support of partners engaged in the same ethical approach as Babilou Family, with the same level of demand and the same environmental and social ambitions. As such, we ensure that our partners comply with the highest standards of human rights, fundamental freedoms, human health and safety, environmental protection and the fight against corruption.* ”

**Damien Martin**  
Chief Financial Officer



# A WORD FROM THE VP EDUCATION, QUALITY & SUSTAINABILITY



“ Every day in our nurseries, we see the faces of the future in the children we host. This small glimpse of the world we will create for future citizens is motivation enough for us to do the right thing at Babilou Family. Every day, in every action, we must strive to take the right decisions and do good, for that is how we will create a better world for the children we care for. The code of ethics is a useful guide to help each of us at Babilou Family to strive for excellence and to ensure that we are doing the right thing.

We are committed to supporting each employee in this process and are available to guide you so that our approach becomes our common voice of action.

Babilou Family's code of ethics sets out clear guidelines and directions to enable each Babilou Family employee to do the right thing. Always.

”

**Sridevi Raghavan**  
VP Education, Quality & Sustainability



## A WORD FROM THE CHIEF DIGITAL OFFICER



“ *At Babilou Family, the well-being of families and employees is at the core of our daily work. We maintain a relationship of trust with more than 50,000 families welcomed every day and more than 12,000 employees, and we owe them absolute transparency and reliability.*

*Today, Digital is disrupting companies and their organization, as well as human relationships with their customers, employees and partners. We are convinced that Digital allows us to innovate in order to offer high quality education and services for the common good. And we have to define the framework to maintain total transparency towards our interlocutors and to protect them from any deviance. Data protection, privacy and the right to be forgotten are fundamental in a world where we collect and manage a multitude of personal and confidential data.*

*At Babilou Family, we demand the highest standards in terms of ethics, anti-corruption and RGPD compliance for the peace of mind of families and employees.*

”

**Benoit Lamezec**  
Chief Digital Officer



# PREAMBULE

## WHO IS SUBJECT TO THIS CHARTER?

The Ethics Charter applies to all employees, employees and directors of the The Group, whether they work in France or in its foreign subsidiaries.

It is also intended to formalise our principles, values, demands and mutual responsibilities vis-à-vis our suppliers, service providers, intermediaries and, in general, all Babilou Family co-contractors (hereinafter «Business Partners»). This Code of Ethics should guide us in our daily relations with our Business Partners. As such, it applies to the latter and specifies our demands and aspirations in the conduct of our business, selection and relationships with our suppliers.

Since there are multiple scenarios, this document cannot claim to be exhaustive. It is therefore up to each of us to show responsibility and honesty and, where appropriate, to refer them to our hierarchy when we face a new or complex situation.

Whenever you think you are faced with an ethical issue, ask yourself the following questions:

-  Does this comply with the Charter of Ethics?
-  Is this legal?
-  What would be the impact of my actions on our stakeholders and could I justify my decision or action?
-  Would I be comfortable if my decision was made public internally and externally?
-  Am I prepared to take my action or decision transparently?
-  Can this line of conduct damage the reputation of the Group?

If there is any doubt, you should seek advice from the relevant persons: managers, Human Resources Division, Legal Division, Compliance Officer.

In accordance with the internal rules, breaches of the principles set out below may expose you as an employee and/or manager to disciplinary penalties up to and including dismissal.

The Group also expects its Business Partners to adopt ethical conduct consistent with the spirit of this Charter, particularly in the field of human rights and working conditions, in application of the international texts in force.

## WHAT IS THE ROLE OF EVERYONE?

### Role of employees

Each Babilou Family employee must familiarise him or herself with this Policy and undertake to comply with it in the course of his/her activities. In addition, he or she must comply with all applicable international and local laws and regulations in the framework of his/her duties. Everyone must be able to anticipate the risks associated with their role and responsibilities.

Furthermore, this Charter must allow everyone to question the attitude to be taken in sensitive situations that may be encountered in both internal and external relationships.

For advice on its content and implementation, please contact the Compliance Officer.

The Group has set up a whistleblowing system available to its employees, which can be accessed via Babilou Family's ethical whistleblowing Portal:

**<https://babilou.alertcenter-ikarian.eu>**

This whistleblowing system allows all employees to make reports concerning any violation of this code of ethics as well as any obvious violation of a national and/or international law or regulation to which the present code refers, of a unilateral act of an international organisation taken on the basis of such a commitment or of a threat or serious harm to the general interest, of which it has had personal knowledge.

### Role of managers

Because of their responsibilities and their hierarchical role, each manager must be exemplary by ensuring that all of his decisions comply with the Policy.

Each manager must give an example of responsible conduct through their actions and behaviours, both internally and externally.

Each manager must also develop within their teams the culture of ethics. Any ethical issue must be able to be addressed without any difficulty. The manager must listen to the concerns of the employees and relay these concerns to the data subjects.

### Role of buyers and sales people

As Babilou Family is one of the leaders in its childcare market, this role comes with responsibilities that we hold dear and values that we wish to share with all our contractual partners. We are also judged on how we select and treat our customers and suppliers

These responsibilities concern not only the entire community of Babilou Family buyers and sales representatives worldwide, but also all employees who participate in the search for customers or the selection of suppliers.





# I. OUR COMMITMENTS

## FAIR RELATIONSHIPS WITH OUR CUSTOMERS, SUPPLIERS AND OTHER PARTNERS

Our contractual partners must be selected exclusively on the basis of objective criteria and in full transparency. In this respect, no contractual partner can be dismissed for discriminatory reasons (race, religion, etc.) or favoured for personal reasons based on family relations or friendship.

Our relationships are based on principles of impartiality, fairness and loyalty. We must ensure that our contractual partners are committed to respecting our ethical principles, regardless of the country in which they are located.

Continuing to work with contractors who do not comply with our ethical principles, particularly in relation to Human Rights and/or the fight against corruption is not tolerated.

### **We therefore undertake to:**

- › Paying our suppliers on the agreed dates and terms, in accordance with the applicable legal framework, unless there are legitimate reasons for not doing so, such as the non-delivery of the goods or services ordered;
- › Protecting the confidential data that our contractual partners have entrusted to us;
- › Ensure that our contractual partners comply with the highest standards of ethics, anti-corruption, respect for human rights and fundamental freedoms, human health and safety and environmental protection, regardless of the country in which they are located;
- › treating our contractual partners objectively and fairly in our business relationships, excluding any form of favouritism or discrimination and always giving priority to the best value for money;
- › Comply with the contractual commitments entered into with our Business Partners.

### **We must not:**

- › Imposing unbalanced conditions (particularly with regard to payments, deadlines, contractual penalties, etc.) on our contractual partners;
- › Place them in a situation of economic dependence on our Group;
- › Continuing to work with a contractual partner, whether a customer or supplier, that repeatedly fails to meet our expectations or respect our ethical principles, particularly with regard to human rights, fundamental freedoms, health and safety, environmental protection and the fight against corruption.

## Compliance with Competition Law

We conduct our business in a fair and competitive manner. We respect all stakeholders in our professional environment, including our competitors, because it is in our interest to work in a market where business practices are implemented fairly.



### We therefore undertake to:

- › Comply with national, European and international competition rules;
- › Regardless of the country in which we operate, we will never break these rules and promise to respect our customers, our Business Partners, as well as our competitors;
- › Avoid any exchange of sensitive information - that is to say all recent, confidential and strategic information of a company, including information concerning its financial data, price structure, contractual conditions, customers, suppliers, channels and distribution methods, development and strategy, ongoing and planned calls for tenders, etc. - with our competitors;
- › Not denigrate our competitors;
- › Draw up or have a report drawn up at any meeting with our competitors, even in the framework of professional organisations or trade shows;
- › Leave any meeting with our competitors during which sensitive information concerning Babilou Family and/or our competitors would be exchanged and have this departure recorded in the minutes of the meeting;
- › Promptly notify our supervisor if we have sought, received or used, intentionally or accidentally, sensitive information about a competitor and of which it or third parties are the legitimate owners;
- › Promptly notify our line managers if we have shared sensitive information about Babilou Family with a competitor or if a competitor has sought sensitive information about Babilou Family;
- › Contact the Legal Department in case of doubt about practices encountered or suspected or for any competition law matters.

**We may not:**

- Seek and receive any sensitive information concerning our competitors, except through legal competitive intelligence;
- Engage in exchanges, in any form whatsoever (email, letter, formal or informal discussions, telephone exchanges, etc.) with competitors regarding sensitive information concerning Babilou Family and/or its competitors;
- Force our customers or suppliers to terminate any contracts they may have with our competitors by illegal practices;
- Deprive or threatening to deprive a competitor of a source of supply or commercial outlets, for example by encouraging the boycott of a competitor or by encouraging one of our suppliers to break its commitments with a competitor;
- Denigrate our competitors by any means whatsoever (declaration, rumour, etc.)
- To the extent possible, create or promote a situation of dependency (whether or not appropriate) with our suppliers and customers;
- Act on the pricing policy of our customers.

**We remind you that a violation of competition law may result in severe penalties for Babilou Family, as well as the employee who caused the prohibited act.**



## Prohibition of acts of corruption and facilitation payments

We invite all Babilou Family employees, managers, suppliers, customers and other business partners to read and refer to the Babilou Family Anti-Bribery Code of Conduct available on the website [www.babiliou-family.com](http://www.babiliou-family.com)

Corruption is unacceptable and is not compatible with The Group's values, both in relations with public authorities and in private relations with our various Business Partners. It is a criminal offence.

As a result, it is prohibited to give or receive any advantage, in the form, for example, of an unlawful payment or the payment of money in order to obtain an undue advantage.

It is important for each employee to understand that acts aimed at legitimately or illegitimately influencing a public official, or a private company or person may sustainably damage our image.

We prohibit any act of corruption done directly or through an intermediary such as a sales agent or supplier. We could be subject to action even if The Group has not given the order.

## This course of action therefore requires us to:

- Not to accept or solicit money, or any other advantage whatsoever (gifts, invitations, etc.), which may be perceived as influencing a commercial relationship, or our relations with the public administration;
- Not use intermediaries to do what we do not have the right to do or what we do directly;
- Carefully select our Business Partners;
- Closely monitor our relations with public administrations ;
- Ensure that they are informed of our values and undertake to respect them in particular when they are led to represent us in countries where there is a high risk of corruption.



## Gifts and invitations

While offering a gift or making an invitation of low value can be considered as an act of courtesy in certain situations, such an act may cause confusion and be considered a wrongful act constituting corruption. In addition, these practices may create conflicts between personal interests and professional obligations.

It is strictly prohibited to offer a gift or any advantage or to make an invitation to a person in order to obtain an undue advantage or to exercise in an unjustified manner any influence on his or her actions or those of a third party.

Each territory is therefore asked to organise a centralised process for keeping a gift register recording the nature, amount and date of receipt of all gifts and invitations from third parties.



### Thus, it is, in any event, formally prohibited to:

- Paying or offering to pay a sum of money to a Public Official or a Babilou Family Commercial Partner or receiving a sum of money from a Commercial Partner;
- Giving a gift to a Public Official ;
- Offering a gift or invitation to a person for the purpose of obtaining, improperly, a consideration or influencing his or her decision or that of a third party (an administrative authorisation on behalf of Babilou Family, etc.);
- Requesting or accepting a gift or invitation as consideration, reward or motivation to award a contract or select a Babilou Family Business Partner;
- Offering or receiving a gift or invitation during a tender phase or during the negotiation of a contract;
- Offering a cash gift or gift certificate.

However, and in accordance with the above, gifts and invitations of nominal value may be offered or received, up to a maximum annual amount of 150 euros per Employee.

As soon as you receive or offer gifts or invitations, you must bear in mind these three simple rules: be transparent to your supervisor by informing him immediately of any gift or invitation received, stay within reasonable limits and wonder how the gift you receive could be perceived from outside.

**Thus, to be acceptable, gifts and invitations received or given on behalf of the Group:**

- Comply with the laws and regulations in force, including known policies of the company benefiting therefrom;
- Must be exceptional and in accordance with current commercial practice (occasional invitations to lunches or business receptions);
- Must be of reasonable and symbolic value and must not be given frequently to the same person;
- Must not be in cash or gift vouchers.

**Ethical or not ?**

This non-exhaustive table summarises in concrete terms what Babilou Family considers ethical or not:

TYPE OF GIFT OR INVITATION	CHARACTERISTICS	RULES
Advertising object	Bearing the trade mark or name of the supplier who addresses them visibly and unambiguously	Permitted if the object has a non-significant or symbolic value
Non-advertising object	Without any distinctive sign of the supplier, sometimes sent via a distribution company	Permitted if the object has a non-significant or symbolic value
Invitation to a business meal	Whatever the restaurant	The prior agreement of your line manager is required if the amount exceeds €150 per person At reasonable frequency
Invitation to a study trip	France or abroad	Prior approval of the Legal Department or the Compliance Officer. Obligation to pay personal expenses
Invitation to an event	On the occasion of a sporting or cultural event	Prior approval of the required hierarchy Obligation to pay personal expenses
Invitation to an accommodation trip	France or abroad	Prohibited
Cash or purchase vouchers exchangeable for cash	France or abroad	Prohibited

## Conflicts of interest

Whether in your professional or private life, none of your actions should conflict with your professional responsibilities within Babilou Family. The mere appearance of a conflict of interest could damage the reputation of The Group and its employees and Business Partners.

A conflict of interest exists when a personal interest interferes with the function performed within Babilou Family and such interference is likely to affect the correct performance of the duties performed on behalf of Babilou Family.

Such conflicts may arise when an employee is in a situation where his or her personal, social, financial or political interests alter their judgment by no longer objectively serving the interests of The Group.

### For example, the following is considered a potential conflict of interest:

- › Engaging in commercial transactions with a supplier or subcontractor on their own behalf or on behalf of third parties (family, friends, etc.);
- › Investing directly or indirectly in the capital or debt of a supplier or subcontractor;
- › Participating in the selection of a supplier when there is a conflict of interest;
- › Holding a second job. If this is permitted by the employment contract with the company, this activity must always be authorised in advance by the line manager.

Conflicts of interest alter judgment. As an employee, you must avoid any situation that creates or may create a conflict between your personal interests (or those of your family members) and those of The Group.

### All Employees undertake to:

- › Prioritise Babilou's interests by refraining from highlighting any personal, financial or family interest that could raise doubts as to their integrity;
- › Inform their line managers and, where applicable, the Legal Department and the Compliance Officer as soon as possible and in writing in the event of potential or proven conflicts of interest;
- › Refrain from participating in the tasks and duties entrusted to them and likely to give rise to the conflict of interest, if any.

The occurrence of a conflict of interest is not necessarily insurmountable, since it is important to inform one's line manager to see if it is possible or not to remedy this situation. The line manager should decide whether it is necessary to remove an employee from an ongoing file or whether it is possible to authorise him or her to continue his/her activity subject to certain precautions or adaptations.



## Protection of sensitive/confidential information

Anyone working in the Group may have access to information that is classified as confidential, that is, information that has not yet been made public and which may be of very high value.

Regardless of the nature of this information (commercial information, information covered by professional secrecy, etc.) and the medium used, each employee must be aware of the consequences of voluntary disclosure of such data for The Group, our employees and our Business Partners. We are therefore all responsible for protecting this information.

Before passing on this information or revealing its content to colleagues or third parties, the status of such information, its strategic nature or not, the degree of sensitivity and legitimacy of an employee or third party to receive it should be questioned.

### For this, there are a few simple rules to follow:

- Only disseminate sensitive information to persons with a legitimate need to know it in the framework of their professional activity;
- Securely store all confidential information (suppliers, customers, etc.) held in paper or electronic format;
- Keep in mind during your discussions with people outside The Group (family, press, social media) that internal information is not intended to be disseminated;
- Do not transfer sensitive or confidential information to personal media (telephone, computer) or to personal email addresses;
- Do not keep internal information (including any copies), in the event of departure from the Babilou Group;
- Refrain from using sensitive or confidential information outside Babilou Family.

Those of us who have, in addition, access to confidential information received in the course of negotiations with Business Partners have the same obligation to protect it from disclosure.

In the performance of your duties, you may be faced with extortion attempts. If you are not sure whether you can disclose information or use information in your possession, seek advice from your supervisor or legal department.



## Protection of personal data

Babilou Family also undertakes to protect all personal data that The Group processes, in accordance with the General Data Protection Regulation. For more information on how The Group may process your personal data, please see The Group's personal data policy at [www.babilou-family.com](http://www.babilou-family.com).

## Representing The Group

You represent The Group vis-à-vis the outside world and must be aware of the image you are conveying. Your behaviour must therefore be professional and reflect the values of the Babilou Group. The Group's reputation depends on the behaviour of each of us.

## In this respect, we must:

- Ensure that there is no possible confusion between our personal opinion or interests and those of The Group;
- Always identify ourselves as Group employees when we use social media in the framework of our professional activities;
- Act by keeping in mind that we convey The Group's values in our professional language and behaviour;
- Do not use Group resources (headed paper, business email address) for our personal affairs or to express our personal views.

The Group is required to express itself in the media or to be requested by them to discuss its strategy, performance, future projects...

## We must not:

- Speak or write or make any commitment on behalf of the Group. Only persons authorised by the General Management are authorised to do so.
- Speak or write on subjects outside our scope of expertise.



## Protection of The Group's assets

The Group's assets are not only physical or tangible elements (goods, supplies, computers, etc.), they also include:

- Intangible assets such as ideas, concepts or know-how that you develop throughout your professional activity within The Group;
- Customer or supplier databases and any information you have access to perform your function.

### In this respect, we undertake to:

- Preserve and protect the resources of The Group in order to prevent it being damaged, used for illegal or unlawful purposes, transferred or disposed of without authorisation;
- Preserve and respect the intellectual property of others. It is only possible to use resources belonging to third parties after ensuring that The Group has the right to do so.

### We must not:

- Use The Group's resources for personal purposes. The personal use of communication tools such as e-mail, telephone, internet, etc. may be tolerated as long as it is limited, does not result in unreasonable costs and does not encroach on professional activity.
- Improper use of information systems, electronic mail and the Internet.
- Use resources belonging to third parties without being assured that The Group has the right to do so.

## Accuracy of Information - Money Laundering

We all have an obligation to ensure that the information contained in our financial documents is accurate.

In particular, it is essential to provide our shareholders with accurate and reliable information in compliance with the accounting, financial and stock market standards and regulations in force.

Money laundering is a crime which consists of facilitating the false evidence of the origin of the property or income of a crime or offence or contributing to a transaction involving the placement, concealment or conversion of the direct or indirect proceeds of a crime or crime.



### **We must:**

- Keep financial and professional documents secure and comply with archiving instructions;
- Cooperate with internal and/or external auditors;
- Exercise due diligence to ensure that we work with Business Partners with legitimate activities and whose funds have no criminal or tortious origin;
- Reject cash transactions. If no other possibility is possible and only within the limit of legally authorised amounts, these transactions must be expressly authorised by the General Management and be properly recorded and documented in The Group's accounts.

If any item of a proposed transaction appears to be inadequate or likely to violate applicable laws or regulations, inform your line manager who will contact The Group Legal Department.

### **Fraud prevention**

All Babilou Family employees and managers shall refrain from committing any act that could constitute a form of fraud. Fraud includes deliberately deceiving others to obtain some sort of benefit, illegitimately or illegally, or to evade a contractual or legal obligation.

#### **In particular, it is prohibited to:**

- Misappropriate sums, products or equipment belonging to The Group for personal use or use other than that made by Babilou Family;
- Falsify any document, especially accounting, administrative or financial documents (e.g. financial statements or invoices);
- Make a false statement, whether mandatory or voluntary, to a private entity or public authority that requires it by law or contract;
- Destroy supporting documents;
- Commit any other action that could be considered fraud, such as impersonating another person (e.g., forging a signature).

Employees undertake to keep proof of the financial operations carried out, and to transcribe these operations faithfully into Babilou's accounting system.



## BABILOU FAMILY AS EMPLOYER

Babilou Family wants to guarantee all its employees a pleasant and respectful working environment for the personal realm. Three main principles guide Babilou Family in its role as employer:

- **Benevolence:** Babilou Family asks all of its employees to work together with respect, benevolence, solidarity and trust. All forms of discrimination, harassment or disparagement are intolerable and contrary to Babilou Family's ethics.
- **Respect for human rights:** we undertake not only to respect but also to promote respect for human rights.
- **Compliance with laws and customs:** Babilou Family is present in several countries and must comply with both international and local legislation and customs. If laws or customs are stricter than the Charter of Ethics, then they must apply. If this is not the case, it is the Charter of Ethics that must apply unless this represents illegal conduct. The standards will be articulated in compliance with the local laws concerned.



### More specifically, Babilou Family undertakes to:

- Guarantee respect for human rights and fundamental freedoms
- Ensure compliance with national and international regulations and laws
- Guarantee the prohibition of forced labour or modern slavery
- Guarantee compliance with the 1989 International Convention on the Rights of the Child
- Ensure compliance with the provisions of the International Labour Organisation (ILO)
- Promote a free working environment of all forms of harassment and an anonymous whistleblowing system
- Promote non-discrimination, diversity and equal opportunities
- Ensure a working environment and conditions that promote well-being at work and a balance between personal and professional life
- Guarantee the protection of employees' personal data
- Prohibit child labour in compliance with ILO provisions
- Respect the freedom of association of our employees and the possibility of conducting collective bargaining in compliance with the applicable local laws
- Guarantee the health (physical and mental) and safety of our employees by providing them with the equipment and protections necessary for the performance of their duties

## Prohibition of any form of harassment

Babilou Family undertakes to promote a healthy working environment without any form of sexual and/or moral harassment. For their part, Babilou Family's employees are committed to ensuring the maintenance of working relationships guided by respect for the other by adopting appropriate managerial practices, behaviour and communication.

### Moral Harassment

Respect for others is a fundamental value within Babilou Family.

Each of us has the right to respect and human dignity.

Any conduct or action that violates these principles, and in particular, any form of moral harassment is unacceptable.

Babilou Family complies with national laws on moral harassment and does not tolerate any injuring conduct or behaviour that could create a hostile situation within the working environment, or any attitude that may be similar to moral harassment.

To this end, we ask all our employees to:

- Work and communicate with their contacts (internal or external) in a respectful manner with listening and caring; and
- To report any situation resembling moral harassment to their line management, to the Human Resources Department or to the platform dedicated to whistle-blowers (<https://babilou.alertcenter-ikarian.eu>) any situation equating to moral harassment,

it being understood that any behaviour similar to moral harassment may give rise to disciplinary action up to and including dismissal.

### Sexual harassment

Respect for others is a fundamental value within Babilou Family.

Each of us has the right to respect and human dignity.

Any conduct or action that violates these principles, and in particular, any form of sexual harassment is unacceptable.

Babilou Family complies with national laws on sexual harassment and does not tolerate any conduct or behaviour that would create an intimidating or offensive situation within the working environment that could be similar to sexual harassment.

To this end, we ask our employees to:

- Refrain from any conduct that may be similar to sexual harassment both internally and vis-à-vis third parties with whom they are in professional contact, and
- To report to their line manager, the HR department or the ethical whistleblowing platform (<https://babilou.alertcenter-ikarian.eu>) any situation equated to sexual harassment,

it being understood that any behaviour similar to sexual harassment may give rise to disciplinary action up to and including dismissal.

## PROHIBITION OF ALL FORMS OF DISCRIMINATION AND PRINCIPLE OF EQUAL TREATMENT

Babilou Family applies an egalitarian human resources policy and ensures that its employees (particularly managers) respect the principle of equal treatment between employees.

The principle of equal pay for men and women and, more generally, for employees in the same situation is fundamental at Babilou Family.

In this respect, Babilou Family ensures that differences in treatment between employees in the same situation are based on objective, relevant and materially verifiable grounds.

Finally, Babilou Family's principle is not to discriminate on any illegal grounds such as origin, gender, sexual orientation, age, morals, real or supposed membership of a particular ethnic group or nation, state of health, disability, religion, political beliefs or trade union activities, as well as all illegal grounds defined by law.

## WELL-BEING OF CHILDREN IN BABILOU FAMILY'S CARE AND PROHIBITION OF ABUSE

The care, well-being and development of children greeted within Babilou Family structures is at the heart of Babilou Family's priorities.

As a result, we ask our employees to adopt:

- Behaviour conducive to fostering the development of each child,
- A positive attitude and method of communication in all respects towards the fostered children but also to their parents.

Any aggressive, violent and/or inappropriate conduct taken against a child and/or a parent is unacceptable and may result in disciplinary action up to and including termination of employment.

### **Babilou Family will not tolerate any form of abuse or mistreatment of a child.**

- Abuse is defined in accordance with applicable local rules. Subject to local provisions that are more protective of children, Babilou Family considers that any act that harms the emotional, physical or sexual integrity of a child constitutes abuse.
- Child abuse is defined as any form of abuse or neglect of children under the age of 18. It includes all types of physical and/or emotional abuse, sexual abuse, neglect, and commercial or other exploitation that result in actual or potential harm to the health, survival, development or dignity of the child in the context of a relationship of responsibility, trust or power.

## Social Responsibility - Sustainable Development

Being an eco citizen and promoting sustainable development is a combination of environmental protection, economic development and social ethics.

We ensure equal opportunities: employment of seniors, non-discrimination (multicultural teams), integration of people with disabilities. We also attach great importance to the environment of the crèche and to reflect the social diversity of its territory of establishment.

### We therefore undertake to:

- Contribute to Babilou Family's environmental initiatives;
- Promote the use of recyclable materials and the development of biodegradable packaging;
- Take measures necessary to prevent violations of environmental directives
- Take into account Babilou Family's environmental protection rules
- Care for each child, apart from any stereotype related to sex, health status, physical appearance, skin colour, culture...





## II. BABILOU FAMILY AND ITS SUPPLIERS

Suppliers occupy a strategic place in the Babilou Family ecosystem; the quality of the relationship we have with them is therefore essential to our success.

The selection process of our suppliers is at the heart of our concerns to ensure that our Business Partners are in line with our values and responsibilities.

As a leading childcare company, we also have a duty to support them in a sustainable improvement process without interference with their business.

As such, in a joint process of building strong and lasting relationships, our suppliers undertake to comply with the anti-corruption code of conduct and this Ethics Charter and in particular the requirements described in the following section.

### Human Rights and Working Conditions

#### **Babilou Family's suppliers undertake to:**

- Guarantee respect for human rights and fundamental freedoms
- Ensure compliance with the provisions of national and international regulations and laws
- Guarantee the prohibition of forced labour or modern slavery
- Guarantee compliance with the 1989 International Convention on the Rights of the Child
- To ensure compliance with the provisions of the International Labour Organisation (ILO)
- Promote a free working environment of all forms of harassment and an anonymous signage system
- Promote non-discrimination, diversity and equal opportunities
- Ensure a working environment and conditions that promote well-being at work and a balance between personal and professional life
- Guarantee the protection of employees' personal data
- Prohibit child labour in compliance with ILO provisions
- To respect the freedom of association and trade union freedom of our employees as well as the possibility of collective bargaining in accordance with applicable local laws
- To respect the right to strike of our employees, when exercised in accordance with applicable local regulations
- Guarantee the health (physical and mental) and safety of our employees by providing them with the equipment and protections necessary for the performance of their duties

Babilou Family's responsible approach is also expressed in the social dialogue that the Management maintains with the staff representative bodies, where appropriate and in compliance with the independence and pluralism of the trade unions in accordance with the applicable local regulations.

## Respect for the Environment

When selecting its Business Partners, Babilou Family pays special attention to suppliers who engage in a sustainable approach to respect for the environment; in this respect, our suppliers must undertake to carry out the actions necessary to reduce their environmental impact.

### This commitment must be envisaged:

- › Upstream, during the design phases, in the selection of raw materials and in the selection of suppliers
- › During the production and provision processes of goods or services to customers
- › Downstream, in the treatment of residual waste or recycling generated by the good or service

### The supplier must engage in the following steps:

- › Reducing energy consumption and sustainable energy choices
- › Reducing water consumption
- › Choice of sustainable raw materials and local priority
- › Reduction of CO2 emissions throughout its value chain
- › Use of raw materials not involved in deforestation

## Mutual commitment to our supplier/ customer relationships

### Babilou Family and its suppliers mutually undertake to respect and enforce with all their Business Partners:

- › The independence of their companies in the conduct of their business, without interference. This should not, however, prevent the search for new common requirements, particularly with regard to the quality of goods and services
- › Confidentiality of data, decisions and projects
- › The absence of conflicts of interest by alerting the Business Partner (s) likely to be in a sensitive situation so they can take appropriate measures and decisions
- › Fair competition with each stakeholder's treatment in accordance with applicable law
- › Fairness and transparency in our relations and in the conduct of our projects and negotiations
- › Not to promote the creation of reciprocal dependence





## III. OUR WHISTLEBLOWING PROCEDURE

### Reporting of violations of the Code of Ethics

The Babilou Family Group encourages dialogue and promotes discussion. It is therefore important for all our employees to report unacceptable behaviours that are a barrier to the economic and social performance of the company.

The best way to address such concerns is to contact your direct line manager. However, if you feel that informing your direct line manager may present difficulties or that the issue to be reported may not be followed up appropriately, you can contact your Human Resources contact, staff representatives and, as a last resort, the Babilou Family Ethical whistleblowing Portal: <https://babilou.alertcenter-ikarian.eu>

Exceptionally, during the transitional period the e-mail address [alerte@babilou.com](mailto:alerte@babilou.com) may also be used.

