

Code of Conduct



Legal Disclaimer:

This document is an English translation of the original French document titled "Règlement intérieur 12 24". All references to the French Labour Code (Code du travail) are provided for informational purposes only. In case of any discrepancy or legal dispute, only the French text shall prevail

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0. PURPOSE & SCOPE OF APPLICATION (*Objet & Champ d'application*)

ARTICLE 1: PURPOSE

In accordance with the provisions of the French Labour Code, in particular Articles L.1321-1 and following, this internal regulation aims to:

- establish, in matters of health and safety, the implementation measures of the regulations as defined by law or by the National Collective Bargaining Agreement for Cancer Centres dated January 1, 1999 (hereinafter, the "Collective Agreement");
- recall the conditions under which the persons referred to in Article 2 below may be required, at the request of Institut Gustave Roussy (hereinafter "Gustave Roussy"),
- to participate in the restoration of working conditions that protect their health and safety, whenever such conditions appear to be compromised;
- define the general and permanent rules relating to discipline, applicable to the same individuals;
set the nature and scale of disciplinary sanctions;
- state the provisions relating to the right of defence, as provided in Articles L.1332-1 to L.1332-3 of the Labour Code or in the Collective Agreement;
- reiterate the provisions regarding abuse of authority in matters of a sexual nature, as well as the provisions prohibiting any form of moral (psychological) or sexual harassment.

This internal regulation may be supplemented by internal memos, provided they contain general and permanent prescriptions in these areas.

ARTICLE 2: SCOPE OF APPLICATION

This internal regulation applies to all individuals bound to Gustave Roussy by an employment contract (hereinafter, "employees").

It also applies—with the exception of the provisions relating to disciplinary sanctions—to the following individuals, for all provisions concerning hygiene, safety, and sexual or moral harassment:

- individuals assigned to Gustave Roussy by a temporary employment agency or an external legal entity (company, association, administration, etc.);
- interns;
- medical residents (internes);
- teaching staff affiliated with a French or foreign university;
- external company personnel working on Gustave Roussy premises;

- agents of the National Institute of Health and Medical Research (INSERM) and personnel from the National Centre for Scientific Research (CNRS) working on the premises of Gustave Roussy.

All the above-mentioned individuals are hereinafter referred to, for the purposes of this internal regulation, as “Personnel” or “Personnel member.”

This regulation applies to all Gustave Roussy premises (workplace, staff cafeteria, parking lots, etc.) across all sites.

1. SAFETY & SECURITY (*Sûreté et sécurité*)

Prevention of occupational accidents and illnesses is a top priority at Gustave Roussy. It requires all Personnel to strictly comply with all hygiene and safety regulations.

To this end, general and specific safety instructions currently in force at Gustave Roussy are posted and must be strictly observed by all Personnel.

Specific memos define the instructions whenever necessary; they supplement, as needed, the provisions outlined below, which apply in all circumstances.

ARTICLE 3: RIGHT TO ALERT AND WITHDRAWAL IN CASE OF SERIOUS AND IMMINENT DANGER

Right to withdrawal

Any employee who has reasonable grounds to believe that a work situation or a malfunction in a protective system presents a serious and imminent danger to their life or health may withdraw from that situation, provided they do not create a new serious and imminent danger for others. They must immediately inform the Management or their representative by any means, in accordance with the provisions of the Labor Code.

Any employee who withdraws from a work situation while knowing that it presents no actual serious and imminent danger may be subject to one of the disciplinary sanctions provided for in this internal regulation.

Right to alert through a CSE representative

Any employee who has reasonable grounds to believe that a work situation or a malfunction in a protective system presents a serious and imminent danger must immediately inform Management or its representative.

Any member of the Social and Economic Committee (CSE) who becomes aware of a serious and imminent danger, particularly via an employee, must immediately alert Management or its representative, or, where applicable, the Security Service, and must record all information

related to the danger in the "Serious and Imminent Danger" register. Management or its representative will immediately conduct an investigation with the CSE representative who reported the danger, take the necessary measures, and give instructions to remedy the situation.

ARTICLE 4: SAFETY AND SECURITY INSTRUCTIONS

The promotion and management of the safety of persons and property is the responsibility of Management, in collaboration with Gustave Roussy's employee representative bodies. It is therefore up to Management to provide the means—including appropriate training—necessary to ensure compliance with current safety regulations.

It is the role of supervisory staff at Gustave Roussy to implement and enforce hygiene and safety regulations and to improve prevention measures for the Personnel under their authority. Personnel must follow all safety instructions, including verbal ones, issued by Management or their direct supervisor. They must also, based on their safety training and capabilities, take care of their own safety and health, as well as that of others who may be affected by their actions or omissions at work.

Gustave Roussy may ask Personnel to help restore safe and healthy working conditions if these appear to be compromised.

Employees on fixed-term contracts assigned to tasks involving specific risks must receive tailored information and onboarding, and must complete enhanced training.

ARTICLE 5: USE OF PROTECTIVE EQUIPMENT

Personnel are required to use all personal or collective protective equipment made available to them and to strictly follow specific instructions regarding their use. Any malfunction must be immediately reported to their direct supervisor.

It is particularly noted that damaging or disabling a protective device without justification may constitute serious misconduct.

ARTICLE 6: USE OF PREMISES AND EQUIPMENT

Personnel must use the equipment provided by Gustave Roussy in accordance with its intended use. It is forbidden to use it for personal purposes.

Personnel must also maintain the equipment in good condition and report any failure to their supervisor.

Intentional damage to Gustave Roussy's premises or equipment may result in disciplinary action and a claim for compensation.

Before leaving Gustave Roussy permanently, Personnel must return all equipment and documents (in paper or electronic format) entrusted to them during their employment.

If required for safety reasons or in the event of repeated thefts, Management may verify the personal belongings of Personnel, in compliance with legal conditions protecting privacy and

dignity. Personnel may request the presence of a witness (another staff member or staff representative) during such checks. They also have the right to refuse the check. In such cases, Management may contact a police officer. Otherwise, checks will be conducted with a third-party employee present, ensuring maximum discretion.

Personnel must comply with the "Information System User Charter" and the "Information System Administrator Charter."

These charters are annexed to this internal regulation and are available on Gustave Roussy's intranet.

ARTICLE 7: INTERVENTION ON EQUIPMENT OR DEVICES

Personnel are strictly prohibited from intervening on any equipment or devices maintained by certified professionals on their own initiative.

This does not apply to regular maintenance or minor repairs included in user manuals.

ARTICLE 8: MOVEMENT AND PARKING

Personnel must circulate cautiously in Gustave Roussy's parking areas and comply with all traffic signage and, in general, the French Highway Code.

Vehicles must only be parked in designated areas. Management reserves the right to remove any vehicle improperly or dangerously parked.

ARTICLE 9: WORKPLACE OR COMMUTING ACCIDENTS

Any accident occurring during work or while commuting between the workplace and home must be reported the same day—or within 24 hours at the latest, except in case of force majeure—to the HR department, Gustave Roussy's emergency department, or the on-call nursing supervisor.

ARTICLE 10: BEHAVIOR

Management may take any preventive measure against Personnel whose behavior could endanger the safety of persons or property.

ARTICLE 11: SAFETY RULES RELATED TO HIGH-RISE BUILDINGS

Occupants of Gustave Roussy's high-rise buildings may not make any changes to the organization of rooms, annexes, or corridors without considering applicable safety regulations. In particular, it is forbidden to:

- Furnish or arrange offices without the Security Service's approval regarding fire load, especially in terms of furniture materials.

- Bring in, store, or use solid, liquid, or gaseous fuels or liquefied hydrocarbons except as allowed by current regulations.
- Place any objects or equipment in circulation areas.

ARTICLE 12: SECURITY AND SURVEILLANCE MEASURES

A video surveillance system is in place to ensure the safety of people and property within Gustave Roussy premises, including indoor and outdoor parking areas.

Personnel must visibly wear their identification badges for their own safety and to secure the facilities when moving within Gustave Roussy.

In accordance with applicable regulations, images are stored for a maximum of one month and may be viewed in the event of an incident by the Unified Security Department and law enforcement authorities.

To exercise their right to access recorded images or request more information, Personnel may contact the Head of the Unified Security Department or Gustave Roussy's Data Protection Officer.

2. HYGIENE (*Hygiène*)

ARTICLE 13: PROHIBITION OF SMOKING AND VAPING

In accordance with applicable regulations, smoking and vaping are prohibited in all enclosed and covered areas that are open to the public or constitute workplaces within healthcare institutions.

Therefore, it is strictly forbidden to smoke or vape in any individual or shared spaces at Gustave Roussy, such as offices, break and dining areas, meeting rooms, restrooms, hallways, reception areas, etc.

Failure to comply with these provisions may result in one of the disciplinary sanctions outlined in this internal regulation, including possible dismissal for misconduct, as well as criminal penalties (fines provided for by applicable regulations).

Furthermore, as part of its commitment to the "Tobacco-Free Health Facility" (Lieu de Santé Sans Tabac – LSST) initiative led by the Regional Health Agency and supported by the Ministry of Solidarity and Health, Gustave Roussy also prohibits smoking and vaping in all outdoor areas of the facility, including building forecourts, ambulance entrances, lawns, parking lots, etc.

An addiction consultation is available to Gustave Roussy Personnel by appointment through the DISSPO (Interdisciplinary Department for Supportive Care in Onco-Hematology).

ARTICLE 14: CHANGING ROOMS

Lockers or individual wardrobes provided to Personnel for clothing and personal belongings must be kept clean and used solely for their intended purpose. It is forbidden to store perishable goods and/or hazardous substances in them. For hygiene or safety reasons, Management reserves the right to open the locker or wardrobe, preferably in the presence of the employee or, in their absence, in the presence of a person of their choosing.

ARTICLE 15: SHOWERS – WASHBASINS

Personnel may not use showers, washbasins, or changing rooms reserved for patients without authorization, unless required for specific hygiene needs.

ARTICLE 16: MEALS

Meals must be taken in designated areas, unless otherwise authorized by Management. Access to the staff restaurant is only permitted during designated meal times.

ARTICLE 17: DRESS CODE

Personnel concerned must wear the office professional attire as outlined in recommendations by Gustave Roussy's hygiene team.

Professional attire must not be used to display religious, political or philosophical beliefs in an ostentatious manner.

Hairnets or head coverings are not permitted outside the areas where their use is mandated by hygiene protocols.

ARTICLE 18: ALCOHOLIC BEVERAGES AND DRUGS

It is forbidden to enter the premises or be present while intoxicated or under the influence of drugs.

It is also prohibited to bring in, distribute, or consume alcoholic beverages or drugs within Gustave Roussy's work premises.

In accordance with the employer's obligation to ensure workplace safety, Management may require breathalyzer testing for healthcare, technical-medical, and clinical staff, as well as security personnel, those performing certain tasks or missions, or operating specific equipment or vehicles—where alcohol intoxication may pose a direct or indirect danger to the individual or others.

The Personnel concerned may request the assistance of a third party and the right to a second opinion by a physician of their choice.

Similarly, Management may conduct saliva drug tests for healthcare, medical-technical, and

clinical staff, security personnel, or those in roles where drug use could present a safety risk. Testing must be conducted discreetly by a trained individual in the presence of a witness, to ensure objectivity and respect for dignity and the right to a defense.

Test results are confidential.

Before the test, the individual must be informed of their right to refuse it, to request the presence of a third party from Gustave Roussy, and to seek a counter-expertise from a laboratory of their choice, which must be carried out promptly.

Refusing to undergo a breathalyzer or saliva drug test may result in one of the disciplinary sanctions provided in this regulation, including dismissal for misconduct.

ARTICLE 19: MEDICAL MONITORING

No one may be hired without undergoing a medical information and prevention visit, the vaccinations required under Articles L.3111-1 and following of the Public Health Code, and any additional examinations required by Gustave Roussy's Occupational Health Department. Under current regulations, Personnel are required to attend all medical check-ups and occupational health assessments, including initial and periodic examinations, return-to-work visits, and special medical surveillance, as well as tests required under specific legislation (e.g., food handling, ionizing radiation, biological risks).

No employee may refuse the medical examinations required to:

- Determine their fitness for the job,
- Detect occupational diseases,
- Identify any condition that may endanger patients or coworkers.

These examinations are mandatory. Refusal to undergo them may lead to disciplinary measures, including possible dismissal for misconduct.

3. DISCIPLINE (*Discipline*)

ARTICLE 21: WORKING HOURS AND SCHEDULES

Employees must comply with the posted working hours as well as with the time recording procedures in place.

Working time does not include the lunch break. This break is set at one hour and must take place, with the agreement of the Department Head, between 11:30 a.m. and 2:30 p.m. Exceptionally, and for operational reasons, this break may be shortened with the approval of Management.

Employees performing duties that require continuous presence must remain at their post until they are effectively replaced.

Failure to comply with the work schedule constitutes a breach of work discipline and may result in one of the sanctions provided for in these internal regulations.

ARTICLE 22: LATENESS AND ABSENCES

Any unauthorized lateness must be justified to the immediate supervisor. Repeated and unjustified lateness may result in one of the disciplinary sanctions provided for in these regulations.

Except in cases of force majeure, any absence must be authorized in advance by Management or its duly authorized representative, within the required time frame (and in any case, no less than eight days unless a longer period is stipulated by law or the Collective Agreement).

Unauthorized absence constitutes an irregular absence which, if repeated, may lead to one of the disciplinary sanctions outlined in these regulations.

Any unavailability due to illness or accident must, except in cases of force majeure, be reported and justified with a medical certificate indicating the expected duration of the absence, immediately and no later than within 72 hours. Any extensions of sick leave must be reported to Management no later than the day before the originally scheduled return date; the supporting medical certificate must be submitted within 72 hours.

In accordance with the Collective Agreement, for employees subject to it, Management must be informed of the employee's place of residence.

The dates set for the start and end of annual leave must be strictly observed by employees.

Compensatory rest days for overtime, public holidays, on-call duties, or exceptional leave granted by Gustave Roussy may not be taken or modified without the prior approval of the immediate supervisor.

ARTICLE 23: CONDUCT

Employees must demonstrate appropriate dress, behavior, and attitudes in the performance of their duties, respecting the freedom and dignity of others. They are expected to observe basic standards of conduct in a shared work environment.

Employees must show respect and courtesy toward other Gustave Roussy staff, patients, and their families. In particular, they must refrain from making any remarks in the presence of patients or visitors that could disturb the calm atmosphere essential in a hospital setting.

Any fighting, verbal abuse, insults, aggressive behavior, or incivility is strictly prohibited within Gustave Roussy, especially when such behavior may be subject to criminal penalties. The same applies to any racist, xenophobic, sexist, and/or discriminatory behavior as defined by the provisions of the Labor Code and the Penal Code.

Furthermore, no employee may retain money or valuables belonging to patients under the care of Gustave Roussy. Such items must be handed over to the Medical-Administrative Relations Department (SRMA) at the relevant site, through the person authorized by Gustave Roussy for this purpose.

Any breach of these provisions may result in one of the disciplinary sanctions provided for in these internal regulations.

ARTICLE 24: PRINCIPLES OF NEUTRALITY AND SECULARISM

The principles of neutrality and secularism in public service apply to all public services, including those provided by private law entities.

These principles therefore apply to the staff of Gustave Roussy, a Private Health Establishment of Collective Interest carrying out public service missions.

They require employees to treat all individuals equally and without distinction, regardless of their philosophical or religious beliefs, by demonstrating strict neutrality and refraining from showing any preference or giving the appearance of preferential or discriminatory behavior—particularly through the expression of religious, political, or philosophical beliefs while performing their duties.

Consequently, any ostentatious display of religious, political, or philosophical beliefs—whether through visible signs such as clothing, or through actions or speech—is prohibited for Gustave Roussy staff.

The display of religious symbols or emblems within Gustave Roussy premises, except in areas designated for worship, is also prohibited.

Any breach of these provisions may result in one of the disciplinary sanctions outlined in these internal regulations.

ARTICLE 25: HARASSMENT AND SEXIST BEHAVIOR

Sexual Harassment

In accordance with Articles L.1153-1 et seq. of the French Labor Code, no employee shall be subjected to:

1. Sexual harassment, defined as repeated comments or behavior with a sexual connotation that either undermine their dignity due to their degrading or humiliating nature, or create an intimidating, hostile, or offensive environment;
2. Conduct considered equivalent to sexual harassment, consisting of any form of serious pressure, even if not repeated, exerted with the real or apparent aim of obtaining a sexual act, whether for the benefit of the perpetrator or a third party.

No employee, trainee, intern, or job applicant may be sanctioned, dismissed, or subjected to any discriminatory measure—direct or indirect—particularly regarding pay, training,

reassignment, assignment, qualification, classification, promotion, transfer, or contract renewal, for having been subjected to or for refusing to submit to acts of sexual harassment.

Likewise, no employee, trainee, or intern may be sanctioned, dismissed, or discriminated against for having reported or testified to acts of sexual harassment.

Any provision or act contrary to Articles L.1153-1 to L.1153-3 is null and void.

The employer shall take all necessary measures to prevent, stop, and sanction acts of sexual harassment.

Conversely, any employee who engages in such behavior in the course of their duties may be subject to disciplinary action, up to and including dismissal for gross misconduct.

Sexist Behavior

In accordance with Article L.1142-2-1 of the French Labor Code, no one shall be subjected to sexist behavior, defined as any conduct related to a person's sex that has the purpose or effect of undermining their dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.

Any employee who engages in such behavior in the course of their duties may be subject to disciplinary action, up to and including dismissal for gross misconduct.

In accordance with current regulations, a CSE (Social and Economic Committee) representative and an employer-designated representative responsible for addressing sexual harassment and sexist behavior are appointed within Gustave Roussy.

Moral Harassment

In accordance with Articles L.1152-1 et seq. of the French Labor Code, no employee shall be subjected to repeated acts of moral harassment that have the purpose or effect of degrading their working conditions in a way that may infringe on their rights and dignity, affect their physical or mental health, or jeopardize their professional future.

No employee, trainee, or intern may be sanctioned, dismissed, or discriminated against—directly or indirectly—particularly in terms of pay, training, reassignment, assignment, qualification, classification, promotion, transfer, or contract renewal, for having been subjected to or for refusing to submit to repeated acts of moral harassment, or for having reported or testified to such acts.

Any resulting termination of the employment contract, or any provision or act contrary to these rules, is automatically null and void.

The employer shall take all necessary measures to prevent acts of moral harassment.

A mediation procedure may be initiated by any person who believes they are a victim of moral harassment.

Conversely, any employee who engages in such behavior in the course of their duties may be subject to disciplinary action, up to and including dismissal for gross misconduct

ARTICLE 26: DUTY OF DISCRETION AND PROFESSIONAL CONFIDENTIALITY

Employees are bound by professional confidentiality in accordance with the provisions of the Penal Code.

In addition to legal confidentiality obligations, employees are also subject to a duty of discretion, depending on their role and responsibilities, and in accordance with applicable regulations, regarding any information they become aware of in the course of their duties.

Medical information (such as diagnoses or updates on a patient's condition) may only be communicated by Gustave Roussy physicians, under the conditions defined by the Code of Medical Ethics and the Public Health Code, and only in the absence of prior and explicit objection from the individuals concerned.

Routine updates on a patient's condition may be provided by care supervisors to close relatives.

All provisions of this article apply to employees without time limitation, even after the end of their professional activity at Gustave Roussy, regardless of the reason for their departure.

No confidential information concerning individuals working at Gustave Roussy may be disclosed to third parties, except through legal procedures.

ARTICLE 27: PROFESSIONAL AND PERSONAL PHONE USE – EMAIL – CORRESPONDENCE

The use of professional phones for personal calls within mainland France must remain exceptional. Personal calls to or from overseas territories (DROM-COM) and foreign countries are generally prohibited, except in emergencies. In such cases, the employee must go through the switchboard, provide their full name, and cover the cost of the call.

The use of personal mobile phones during working hours must remain reasonable and must not cause any risk, disruption, or delay in the employee's work. It should be limited to emergencies and kept to a reasonable duration.

Occasional and reasonable personal use of Gustave Roussy's professional email system is tolerated. In such cases, private messages must be clearly identifiable and stored in a dedicated folder.

Subject to the rights granted to employee representatives, employees must not have personal mail or packages delivered to Gustave Roussy.

It is strictly prohibited to use Gustave Roussy letterhead for non-professional correspondence or to send such correspondence at the institution's expense.

4. SANCTIONS AND DISCIPLINARY MEASURES – RIGHT TO DEFENSE (*Sanctions et mesures disciplinaires – Droit de la défense*)

ARTICLE 28: NATURE AND SCALE OF SANCTIONS

In the event of non-compliance with the Labor Code, these internal regulations, the charters annexed to these regulations, or service memos containing disciplinary, hygiene, or safety instructions—as well as in cases of failure to perform or poor performance of duties—Gustave Roussy may impose, depending on the seriousness of the breach, one of the following sanctions:

- A reprimand
- A written warning
- Disciplinary suspension without pay, up to a maximum of 5 working days
- Demotion or disciplinary transfer
- Dismissal

ARTICLE 29: RIGHT TO DEFENSE AND DISCIPLINARY PROCEDURES

Right to Defense

No sanction may be imposed on an employee of Gustave Roussy without first informing them in writing of the allegations made against them.

No sanction may be imposed without following the disciplinary procedure set out in the French Labor Code, particularly Articles L.1332-1 et seq., or in the case of dismissal, Articles L.1232-1 et seq.

If the alleged misconduct requires an immediate precautionary suspension, no final sanction may be imposed without complying with the procedure outlined in Article L.1332-2.

Disciplinary Procedures

Sanctions are imposed by Management, and where applicable, at the written and justified request of a supervisor with authority over the employee concerned.

If the intended sanction is a reprimand or a warning, it must be communicated in writing to the employee, specifying the reasons for the decision.

If a sanction other than a reprimand or warning is considered, the procedures outlined in Articles L.1332-2 et seq. of the Labor Code, and L.1232-1 et seq. in the case of dismissal, must be followed.

Management will summon the employee to a preliminary meeting. The summons, sent by registered letter with acknowledgment of receipt or delivered by hand, must state the purpose

and location of the meeting. It must also inform the employee of their right to be assisted by a colleague from Gustave Roussy.

During the meeting, Management or its representative will present the allegations and hear the employee's explanations.

If a sanction is decided, it will be notified to the employee by registered letter with acknowledgment of receipt no earlier than two working days after the scheduled date of the preliminary meeting. If this deadline falls on a Saturday, Sunday, public holiday, or non-working day, it is extended accordingly.

These procedures do not apply to precautionary suspensions with immediate effect (pending a final decision), when the employee's conduct makes such a measure necessary.

ARTICLE 30: TIME LIMITS FOR DISCIPLINARY ACTION

No sanctionable act may give rise to disciplinary proceedings more than two months after the date on which Management became aware of it, unless legal proceedings were initiated within that same period.

However, a breach that occurred more than two months earlier may be cited when imposing a sanction in the event of a new offense.

No disciplinary sanction imposed more than three years prior to the initiation of new proceedings may be used to justify a new sanction.

ARTICLE 31: EMPLOYEE ASSISTANCE

During the implementation of any procedure referred to in Article 29 of these internal regulations, the employee may be assisted during the interview by either a member of a trade union or another employee of Gustave Roussy of their choosing.

Similarly, any employee may submit complaints to Management through their staff representatives.

5. ADVERTISING AND OTHER MISCELLANEOUS PROVISIONS

(Publicité et autres dispositions diverses)

ARTICLE 32: FORMALITIES AND FILING

In accordance with the applicable regulations, this internal regulation is:

- submitted for consultation to the members of the Social and Economic Committee (CSE),
- sent in duplicate to the Labour Inspectorate responsible for Gustave Roussy, along with the opinion issued by the CSE members,
- filed with the registry of the Labour Court (Conseil de Prud'hommes) of Créteil (Val-de-Marne).

ARTICLE 33: AMENDMENT

Any subsequent modification, addition, or removal to this internal regulation shall be subject to the same procedure, in accordance with the provisions of Article L. 1321-4 of the French Labour Code.

Any clause that becomes contrary to applicable legal, regulatory, or contractual provisions due to changes in such provisions shall be deemed null and void by operation of law.

ARTICLE 34: ENTRY INTO FORCE

This internal regulation shall enter into force on January 1, 2021, i.e., one month after the completion of the latest of the filing and publicity formalities.

It is posted in the designated areas within Gustave Roussy.