

CODE OF ETHICS

DISCLOSURE OF SITUATIONS OF MISCONDUCT

Luc Maurice Foundation is committed to carrying out its activities in accordance with the most rigorous standards of integrity, ethics, professionalism and respect for laws and regulations. To this end, Luc Maurice Foundation has set out principles and guidelines to be observed by all staff, which are reflected in the Employee Code of Ethics and its related policies.

It is important for Luc Maurice Foundation to provide all of its staff with the necessary means to enable the secure and confidential disclosure of any situation of misconduct.

Situations of misconduct can for example be linked to a lack of respect towards residents / visitors / employees or partners, to harassment, discrimination, abuse, physical or moral violence, disclosure of confidential or personal information, fraud, theft, accepting a bribe, lack of honesty, non-compliance with laws / regulations and people rights and freedoms, accepting a donation or an inheritance from a resident, the solicitation of residents or visitors, a situation of conflict of interest or appearance of conflict of interest.

DISCLOSURE

Luc Maurice Foundation invites anyone to promptly disclose any unacceptable behaviour from an employee or supervisor. Disclosure can be done:

- By sending an email to Luc Maurice Foundation Ethics Officer at the following email address: divulgation@legroupemaurice.com;
- By calling the Disclosure Line at (514) 331-2788 ext. 20240;
- By sending the disclosure in writing to the following address, indicating on the envelope “**Private and Confidential**”:

Disclosure / Luc Maurice Foundation
Attention of the Ethics Officer
2400 rue des Nations, Suite 137
Montreal, QC H4R 3G4

Anyone making a disclosure under this policy must act in good faith, honestly believe the statement is soundly based, and support it with facts.

CONFIDENTIALITY

Any disclosure received under this policy will be treated confidentially by Luc Maurice Foundation Ethics Officer, as will any communication with said Officer, to the extent permitted by law and taking into account the need to carry out an appropriate investigation.

Although anonymity is an option, it may limit the ability to conduct a thorough investigation. Identifying oneself can therefore be helpful, but the identity of the person will be preserved if they so desire. Any anonymous disclosure should be drafted in clear, precise terms and contain sufficient detail to allow processing, since no clarification can be obtained by the Ethics Officer.

PROCESSING OF DISCLOSURES

Subject to anonymous disclosures, Luc Maurice Foundation Ethics Officer will communicate promptly with the individual who made the disclosure.

The information provided by the individual will then be analyzed by the Ethics Officer to determine whether the disclosure appears, at first glance, to be justified. If necessary, the Ethics Officer will then refer the matter to the Disclosure Processing Committee. The Disclosure Processing Committee consists of the following individuals: Vice-President Human Resources, Vice-President Legal Affairs and Chief Financial Officer of Le Groupe Maurice. This Committee is responsible for ensuring that investigations are conducted with diligence and professionalism, taking into account the nature and complexity of the alleged facts.

Each disclosure received under this policy will be fully reviewed and appropriate action taken without delay by the Disclosure Processing Committee if the results of the investigation demonstrate that there has been a breach or misconduct with respect to the compliance with the Code of Ethics or its related or financial policies (e.g. fraud, embezzlement, abuse of power, bribe).

PROTECTION AGAINST RETALIATION

Luc Maurice Foundation protects against retaliation any person who, in good faith, raises concerns or discloses suspected or actual misconduct, or provides information or cooperation during an internal investigation. This includes reprisals, penalties in all forms and negative repercussions on employment, including any form of violence, dismissal, suspension, demotion, transfer, harassment and discrimination.