

CODE OF **ETHICS**

OF THE **GUARANTEE FUND**

FOR VICTIMS

MAY 2020



CODE OF ETHICS

OF THE GUARANTEE FUND FOR VICTIMS

The values of the Guarantee Fund for Victims — **solidarity, respect, professionalism, and innovation** — are a commitment in its relationships with victims and other stakeholders (see appendix). They guide the behaviour of each employee. Every employee of the company undertakes to respect them.

The purpose of this code is to provide the Fund's employees with a guide to help them put the company's values into practice in the performance of their duties.

This general code is the cornerstone of the Guarantee Fund for Victims' commitments in terms of ethics. The rules and commitments set out are given more specifically in the following documents :

- Victim's Charter
- Charter for Lawyers of the Guarantee Fund for Victims
- Charter for the Medical Advisors of the Guarantee Fund for Victims
- Recovery Doctrine of the Guarantee Fund for Victims
- Investment Charter
- IT Charter

THE GUARANTEE FUND FOR VICTIMS UNDERTAKES TO...

REGARDING THE VICTIMS WHO HAVE RECEIVED COMPENSATION AND OTHER CONTACTS

Respect for victims is at the heart of the Guarantee Fund for Victims' actions. It continually improves its practices in order to better take into account their expectations and needs and to make the most of new technologies to improve the service provided.

The Fund strictly complies with **applicable laws**.

The Guarantee Fund for Victims ensures that its **procedures are transparent and based on high-quality written and oral exchanges**, enabling victims to obtain clear, reasoned, and non-judgemental explanations.

To this end, the Guarantee Fund for Victims relies on **competent and motivated staff** and provides them with ongoing training in order to maintain a high level of standards in the performance of the missions entrusted to them.

The Guarantee Fund for Victims also uses a **network of agents**, medical experts, and specialist lawyers, all applying the same values.

REGARDING ITS EMPLOYEES

The Guarantee Fund for Victims ensures the **well-being of employees**. It ensures good working, health, and safety conditions and is committed to the prevention of psycho-social risks.

It reaffirms the right to disconnect and ensures a good balance between working life and the exercise of family responsibilities by putting in place specific arrangements provided for, in particular, in the agreement on professional equality between women and men and in the teleworking agreement.

The Fund contributes to **developing its employees' professional potential** and ensures responsible career management by anticipating job changes. It ensures, by means of appropriate continuing training of staff, that the employability of employees and social advancement within the company are reinforced and strengthened.

The Guarantee Fund for Victims is committed to promoting **diversity in the company and the integration of people with disabilities**.

The Guarantee Fund for Victims preserves and encourages the quality of **social dialogue** with social partners through regular and constructive exchanges.

The Guarantee Fund for Victims provides support to employees who consider themselves faced with a moral or ethical question, particularly for the implementation of this code. The latter may turn to their superior or, if they consider it necessary, to the **Ethics Officer of the Guarantee Fund for Victims**, who ensures a consistent approach between departments. The latter reports directly to the Director-General and is bound by confidentiality requirements.

Employees are informed of the duties and procedures for referring matters to the ethics officer.

REGARDING ITS EXTERNAL CONTACTS, PARTICULARLY IN TERMS OF ITS SOCIAL RESPONSIBILITY

The Guarantee Fund for Victims assumes its social and environmental responsibilities. These concern, in particular, victims, victim support partners, employees, and all stakeholders of the Guarantee Fund for Victims. As a long-term and public interest investor, the Guarantee Fund for Victims also implements a **responsible investment policy**.

As part of its social responsibility, the Fund contributes to **social risk research and prevention actions** (combating non-insurance, etc.). To this end, the Fund may provide relevant public players and researchers with certain duly anonymised statistical data.

The Guarantee Fund for Victims ensures **systematic competitive tendering among service providers** for orders involving significant sums. It selects them according to objective competitiveness criteria, after comparing prices, performance and equipment quality, and the suitability of the products or services offered vis-à-vis its previously defined needs.

THE EMPLOYEES OF THE GUARANTEE FUND FOR VICTIMS ARE COMMITTED TO

RESPECT AND CARING

- to ensure that victims and all external contacts are always treated with **respect and dignity**.
- To refrain from any behaviour that is **intolerant, discriminating, or violent, including emotional abuse**.
- to favour, in their professional relationships, listening, dialogue, trust, and team spirit.

SOLIDARITY

- **to provide compassionate support to victims** throughout the compensation procedure within the limits of involvement of the Guarantee Fund for Victims.
- to ensure victims are **treated equally** — particularly as regards claims of single victims and those of victims represented by an agent.

PROFESSIONNALISM

- to respect professional secrecy and, as such:
 - ensure the confidentiality of personal information contained in the claims they are asked to process in the course of their duties, particularly victims' medical data.
- This confidentiality is also required internally. However, this does not prevent an employee, who has access to personal data in the course of their duties, from mentioning some of this information to a colleague if necessary for professional reasons.
- determine, after consultation with their superior, if necessary, what information can be given over the telephone or by post.

- not disclose information outside the Guarantee Fund for Victims relating to its activity and operation, except for information which is included in a communication intended for the public (e.g. activity report).

Relationships with journalists are the sole responsibility of General Management and the communications department.

This professional discretion does not, however, prevent the communication of targeted information by Fund employees who participate in external activities as part of the Company's outreach activities, as long as relevant management staff were notified in advance.

- to ensure the **protection and conservation of personal data** processed by the Guarantee Fund for Victims in the context of its missions in accordance with applicable rules.
- to ensure, in exercising their right of expression, that they do not damage the reputation and credibility of the Guarantee Fund for Victims.
- to be sure to avoid any **conflicts of interest** by immediately reporting to their superior any factors, and, in particular, any personal connections they may have with a person, whether victim or at-fault, which are liable to affect their assessment of a claim entrusted to them and in which they are involved. The superior shall take such action as they deem appropriate to remedy the situation.

If the claim is managed by a colleague, the employee refrains from interfering in its management.

The same rules shall apply in the case of helping to select a service provider with which a member of their family or a close relative holds a position of authority.

As a matter of principle, **employees shall refuse all gifts**, other benefits, or tokens of hospitality (such as tickets to sporting or cultural events, meals in restaurants, trips, etc.) regardless of the party who has offered this generosity (victim, service provider, lawyer, etc.). This may give the impression that their integrity or objectivity in the scope of their work is compromised and that they feel indebted to the donor.

A gift or token of hospitality of a modest value, not exceeding €50, may be acceptable if it is a customary courtesy (e.g. an invitation to lunch), if it is as an exception, and is outside any tendering procedure or negotiation phase with the Fund.

Any gift with an apparent value greater than €50 must systematically be returned to the sender, explaining the company's ethical rules.

When in doubt, the employee in question refers the matter to their superior to find out whether to refuse the gift or accept it for personal or collective use, or ultimately turns to the company's Ethics Officer.

INNOVATION

- to adopt **eco-friendly practices** : recycling, using paper and electricity sparingly.
- to participate in **the identification of best practices** and in their development, as part of the continuous improvement of the **quality of service to victims**.

This general code of ethics must be respected by all employees.

APPENDIX

THE VALUES OF THE GUARANTEE FUND FOR VICTIMS

The Guarantee Fund for Victims is vested with a public interest mission: the compensation, in the name of national solidarity, of the victims of acts of terrorism, common law offences, or traffic accidents caused by uninsured persons or persons who have fled. It also helps victims of crimes who are not eligible for compensation before the Crime Victims Compensation Board (CIVI) to recover the damages awarded to them. Finally, it pursues recourse against the at-fault parties in traffic offences or accidents.

In order to carry out its missions, the Guarantee Fund wished to include in a code of ethics the values and ethical rules that underpin its action and which must be reflected in the practices of its staff, whether in their relationships with victims, with any other external party, or with their colleagues. These values extend to all the Guarantee Fund's agents, particularly doctors and lawyers.

Solidarity is the *raison d'être* of the Guarantee Fund for Victims, as it is responsible for ensuring full reparation to victims on behalf of the national community and through contributions provided for under the law. Solidarity is at the heart of the motivation and daily commitment of its employees, for all victims.

Solidarity is also expressed through good cooperation between the Guarantee Fund for Victims and all partners in public policy for the assistance of victims. Within the teams of the Guarantee Fund for Victims, there is also a spirit of cooperation and mutual aid that contributes to providing the best possible service to victims while promoting the well-being of employees at work.

Respect, above all, means respecting the dignity and rights of victims, which is at the heart of the Guarantee Fund for Victim's compensation and support mission. Respect goes hand in hand with a caring attitude.

Respect and caring must also guide the working relationships between employees, particularly in the context of hierarchical relationships. They are the guarantee of the professional fulfilment of each individual and the efficiency of collective work.

The Guarantee Fund for Victims must ensure, for all stakeholders, including the perpetrators of offences within the framework of its collection mission, to strictly comply with both the legal and ethical rules set out by the company.

The **professionalism** of the Guarantee Fund for Victims' staff is an assurance of the trust that victims, and all the Fund's contacts, place in it. It is the condition for effective and responsive action.

It is based on a high level of ethics and professional skills, maintained through demanding continuous training for all employees.

Finally, the spirit of **innovation** inspires the work of the Guarantee Fund for Victims and its employees, in order to continuously optimise support for victims according to their expectations and the emergence of new needs and new solutions, particularly in terms of technology.

Employee initiative is encouraged throughout the Fund's professions.

The Guarantee Fund for Victims collectively reflects on how to improve assistance to victims. It encourages innovation and supports research.

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