

From health to beauty

CODE OF ETHICS

PIERRE FABRE LABORATORIES



Pierre Fabre

- 2015 -

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INTRODUCTION

OUR MISSION



WE TAKE CARE OF PEOPLE IN ALL THEIR DIMENSIONS AND ALL THEIR DIVERSITY. IN ORDER TO DO THIS, WE DESIGN AND DEVELOP INNOVATIVE SOLUTIONS THAT CONTRIBUTE TO PEOPLE'S WELL-BEING FROM HEALTH TO BEAUTY.

WE ACHIEVE THIS BY COOPERATING WITH HEALTH-CARE PROFESSIONALS, OUR TRUSTED PARTNERS WORLDWIDE, BY DRAWING RELENTLESS INSPIRATION FROM NATURE AND PLANTS, AND BY PLACING PHARMACEUTICAL ETHICS AT THE VERY HEART OF OUR OPERATIONS.



MR. PIERRE FABRE

OUR VALUES

The story of Laboratoires Pierre Fabre is the story of a man and his values; it is the story of an independent business, uniqueness and a culture. Pierre Fabre's culture is founded on strong values shared by all members of the company.

INDEPENDENCE

Independence has always been a priority for the company's founder, and to preserve this independence, Pierre Fabre transferred all his shares from the company to a government-recognised public-interest foundation bearing his name. The Pierre Fabre Foundation, through holding company Pierre Fabre Participations, of which it has 100% control, ensures the continuity mission established by its founder is respected and develops a programme that provides access to quality medical care and drugs in least developed countries.

PHARMACEUTICAL PRECISION

The Pierre Fabre Group enjoys long-lasting partnerships with health care professionals. A culture of providing evidence, a sense of detail and strict safety requirements are the heart of our quality culture.

COHESION

The Pierre Fabre Group bases their approach on the complementarity of their activity fields : drugs, health products and dermo-cosmetic products. They respect and value the plurality of skills and capabilities in each function.

A HUMANIST APPROACH

The Pierre Fabre Group combines a social and economic project. They pay particular attention to the social standing of their employees and have developed several forms of welfare commitments.

INNOVATION

The Pierre Fabre innovation constitutes an exercise in transforming science into a marketable product. Our competitive advantage is the speed with which we interpret our scientific, technical and commercial expertise into products and services that meet the expectations of our customers.

ENVIRONMENTAL FRIENDLINESS

The Pierre Fabre Group takes into account the impact of their activities on the environment and has adopted a socially responsible approach. Their botanical expertise is fully integrated into the company's mission.

ATTENTIVENESS IN THE FIELD

The Pierre Fabre Group is relentlessly "customer-oriented". Attentiveness translates into a pragmatic way of solving problems and organizing work.

ENTHUSIASTIC ENTREPRENEURSHIP

The Pierre Fabre Group undertakes ambitious development projects. Management promotes creativity and contributes to developing employees' initiative in performing their roles.

PERFORMANCE RECOGNITION

The Pierre Fabre Group makes use of management method focused on the evaluation of individual and collective result. This performance culture is based on the development of professional skills and the affirmation of the autonomy of its employees.

MESSAGE FROM



Pierre Fabre Group stands out for its strong culture developed by its founder, Mr. Pierre Fabre, based from the outset on the values of rigour, integrity, accountability, citizenship, and respect for people and the environment.

Its majority shareholder, the Pierre Fabre Foundation, holds all shares in the Group's holding company, Pierre Fabre Participations, which is responsible for ensuring the continuity mission established by the company's founder is respected. The Pierre Fabre Foundation must ensure the Group upholds these values on a daily basis in all its activities and across all its sites.

The Group's adoption of a Code of Ethics is a natural continuation of this approach, formalising simple yet fundamental and indispensable rules of conduct.

The Code of Ethics is therefore critical to Pierre Fabre Group's reputation.

Pierre-Yves REVOL
Chairman of the Pierre Fabre Foundation

Dear colleagues,

In an ever-changing world, every day we all make decisions that can impact our Group's reputation. Therefore, these decisions must be made in accordance with the values that have guided the Group since its creation.

It is therefore essential that each of us, wherever we are and whatever our position, always treats our partners and colleagues with integrity, responsibility and respect.

This enables us to maintain our stakeholders' trust and sustainably develop our activities at all our worldwide locations, while striving for operational performance at every turn.

Establishing a culture of ethics and compliance is a strategic objective for our Group.

An expression of our concept of business ethics, this Code formalises all the rules of conduct we set for ourselves and gives us a framework to guide us in the choices we make and attitudes we take using good judgement.

We know we can count on each and every one of you to ensure our Code of Ethics is followed to the letter.

Jean-Jacques BERTRAND
Chairman

Bertrand PARMENTIER
Chief Executive Officer

MANAGEMENT

MANAGEMENT COMMITTEE



* Left to right on the picture :

Michael DANON
Senior Vice-President Legal,
Pharmaceutical & Public Affairs

Luc PÉLIGRY
Senior Vice-President
Finance & Operations

Eric DUCOURNAU
Dermo-Cosmetics Division CEO

Frédéric DUCHESNE
Pharmaceuticals Division CEO

Marc ALIAS
Director
Corporate Communications

Thierry DENJEAN
Senior Vice-President
Human Resources

Bertrand PARMENTIER
Group CEO

WHY A CODE OF ETHICS?

Pierre Fabre Group's ambition is to support the demand for care using a holistic approach that ranges from health to beauty. This has led it to conduct research focused purely on anticipating new solutions in both the medical and cosmetics fields.

Keen to best serve the interests of everyone, and patients and consumers of its products in particular, by developing and supplying quality products and services while respecting the environment, Pierre Fabre Group must comply with the ethical principles applicable to the conduct of its business and adopt socially responsible behaviour towards all stakeholders (*) and employees.

With this Code of Ethics, Pierre Fabre Group wishes to formalise its commitment and unite all its employees in both France and abroad through its values.

This Code of Ethics was developed to clarify the rules each employee must follow to ensure they act and make responsible decisions in their daily tasks and activities.

As such, beyond merely complying with legislation, this Code should help each person use good judgement and adopt the expected appropriate ethical behaviour, a reflection of our vision and values as part of our on-going quest for sustainable development.

() suppliers, service providers, competitors, health professionals, patients and consumers, State representatives and officials.*

TO WHOM DOES THE CODE OF ETHICS APPLY?

This Code of Ethics applies to all associates, employees and managers, in all the countries where Pierre Fabre Group is present, in compliance with international standards and local legislation and regulations. Involving everyone in promoting respect for our values and ethical principles will allow us to better achieve our mission, guarantee our image and reputation and enable Pierre Fabre Group to pursue its development safely.

Pierre Fabre Group also expects its partners to adopt ethical behaviour in keeping with the spirit of this Code, particularly in the areas of human rights and working conditions, by applying any international legislation in force.

ROLE OF EMPLOYEES

Each employee must learn this Code, commit to adhering to it in the exercise of their activities and comply with the laws and regulations in force associated with their position. Ethics is everyone's responsibility, and this Code should help each employee to act with integrity as well as guide and support them in their daily choices. Everyone must anticipate the risks associated with their role and responsibilities. This Code should enable everyone to question themselves on the attitude to adopt in the delicate situations they may face in both internal and external relations.

Faced with an ethical issue, employees must always ask themselves:

- Are the laws and regulations in force being applied?
- Are the internal procedures being implemented?
- Is the Code of Ethics being adhered to?
- Do I need to consult my manager?

Pierre Fabre Group has an Alert System described below, accessible to all employees, which allows any suspicion of violation of the provisions contained in this Code to be reported and investigated and where they can obtain help and advice regarding the Code's content and implementation methods. This system does not replace any other existing channels of communication employees may wish to use, such as discussing matters with their manager, contacting human resources and in certain countries their staff representatives. The Alert System is to be used when the situation demands it.

ROLE OF MANAGERS

Given their individual responsibilities and the hierarchical role they play, each manager must set an example by ensuring all their decisions comply with the provisions of this Code.

Each manager must also develop the culture of ethics within their teams. They must therefore ensure that each employee they supervise has been trained in the applicable procedures, regulations and this Code. They must promote compliance with the rules set out in the Code and encourage open communication on any concerns employees may have regarding the implementation of this Code. Any ethical issue, no matter how complex, must be addressed.

Each manager must also ensure the objectives they set for their employees are attainable while complying with this Code.

OUR RULES OF CONDUCT

We attach considerable importance to respecting the laws and regulations that govern our international activities.

Each employee must at all times ensure that their initiatives and actions are carried out in compliance with not only:

- these laws and regulations, but also
- the codes of conduct and good practices of the professional associations and federations to which Pierre Fabre Group belongs.

The stipulations of this Code do not therefore entitle them to depart from any of these other provisions. As such, if applying the principles set out in this Code would result in conduct or an action leading to non-compliance with these provisions, then these provisions must prevail.

It is further specified that the provisions set out in other Group codes or charters specific to certain activities cannot depart from the stipulations of this Code of Ethics.

I. MEET ALL OUR PRODUCT USERS' NEEDS, FROM HEALTH TO BEAUTY

Pierre Fabre Group expects each employee to:

- Comply with all legislation and regulations governing the design, development, manufacture and distribution of our products, specifically: Good Clinical Practices, Good Laboratory Practices, and Good Manufacturing and Distribution Practices.
- Ensure the tolerance of our products is monitored and supervised during clinical trials and throughout their marketing, while complying with legal obligations regarding Pharmacovigilance, Medical Devices Vigilance, Cosmetovigilance, Nutrivigilance and general product safety.
- Communicate to the Group's relevant departments, in accordance with applicable internal procedures, any information concerning the safety of our products.
- React quickly and take all comments about quality and all product complaints on board, in our quest for continuous improvement and to ensure the complete satisfaction of our customers and consumer patients.



We take care of people in all their dimensions and all their diversity. In order to do this, we design of and develop innovative solutions that contribute to people's well-being from health to beauty, by placing pharmaceutical ethics at the very heart of our operations.

1.1 DEVELOPMENT OF OUR PRODUCTS / PROTECTION OF USERS / PRODUCT SAFETY AND QUALITY

The safety and quality of our products are top priorities for us.

During all stages in their life cycle, we commit to complying with all the legislation, regulations and standards applicable to the research, development, manufacturing and marketing of the products we sell.

- Thus for all our products, our research and development activities implement innovative scientific methods sometimes derived from the work of our own researchers. All our research projects are duly validated before we commit to them, following an ethical and scientific examination. The information obtained from clinical research is recorded and stored in accordance with applicable regulations.
- From the manufacture to the distribution of our drugs and medical devices, we comply with the main European and international product quality and process guarantee standards.
- We market dermo-cosmetic products and food supplements whose safety and efficacy are guaranteed by rigorous tests that comply with the quality and control standards applicable in the different countries in which we market them in.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

My wife has suffered from nausea and digestive problems since using a new Pierre Fabre drug. Should I report it?

Regardless of how you hear about it and even though these symptoms may not necessarily be due to our product, you should always report knowledge of any side effects to our Pharmacovigilance Department immediately. Patient health and safety is our top priority, it is our duty to always react quickly.

I am a production line operative and I detect defective products that do not meet Pierre Fabre Group's quality standards. What should I do?

You must immediately inform your superior who will work with our Quality Assurance Department to resolve the problem by taking the appropriate measures.

1.2 DUTY TO PROVIDE RESPONSIBLE INFORMATION AND COMMUNICATIONS

Pierre Fabre Group commits to provide all stakeholders with clear and transparent information and to comply with the strictest ethical standards when communicating information on drugs or any of its other products.

- We insist on transparency in the safety and quality information we provide on our products.
- We make sure all information useful to patients and consumers features on our product labelling and packaging and endeavour to ensure our drug and product leaflets are clear and legible so they can be easily understood by everyone in each country.

For each of our brands, we strictly adhere to the principles of responsible communication and ensure our products are promoted ethically and, where appropriate, in line with the product's authorised use.

- Irrespective of the means of communication used, we want the information communicated to be accurate, objective, honest, transparent, justified and comprehensive enough to allow consumers to understand the purpose and quality of the product and how to use it correctly.
- We respect the independence of patient organisations and build honest and open relationships with them.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

I discovered some information contained on our product that was not updated following the latest modifications made [leaflet, package, etc.]. Should I report it?

Yes, report it to your superior who will forward the matter to the relevant department. It is important that the information on our products is always accurate, precise and up-to-date, a sign of exemplary rigour and impeccable quality.

As part of a new communication campaign for a sunscreen in France, a colleague suggests excluding any information message about staying safe in the sun. What should I do?

The communication campaign must be revised to include mandatory prevention messages for consumers. Indeed, our communications must comply with the recommendations of the European Commission and the advertising self-regulation authorities on the promotion and marketing of sunscreens.

Pierre Fabre Group expects each employee to:

- Only distribute to the public information authorised in accordance with the applicable regulations and recommendations.
- Only use communication media on our products that have been approved in accordance with internal procedures and authorised by the relevant authorities when required by regulations.



II. DEVELOP A TRUSTWORTHY RELATIONSHIP WITH HEALTH PROFESSIONALS

Pierre Fabre Group expects each employee to:

- Act honestly and with integrity in compliance with applicable regulations and with respect for the complete independence of health professionals in carrying out their profession.
- Never propose or offer any form of monetary incentive to a health professional or association of health professionals to influence their decision to recommend or prescribe our products.
- Always ensure hospitality in collaborations or at scientific events remains reasonable, in accordance with any local regulations likely to apply.



Our company's ambition is to support the demand for care using a holistic approach that ranges from health to beauty. This has led it to carry out research focused purely on anticipating new solutions in both the medical and cosmetics fields. To accomplish this mission, we forge close, trustworthy partnerships all over the world with health professionals who are in the best position to prescribe or recommend our products, specifically pharmacists and doctors. They know their patients' needs better than anyone.

2.1 TRANSPARENCY AND ETHICS IN OUR RELATIONS

When we work with health professionals, we attach great importance to acting ethically, honestly and with integrity, while complying with applicable laws and respecting their independence in carrying out their profession.

Whether when entering into partnerships for consultancy services, or when working with health professionals during expert meetings, conferences or symposiums, our relationships always have the goal of improving our treatments, patient well-being or the effective use of our products.

We call on the services of a health professional only when there is a legitimate need and the expertise is justified, and we ensure the payment is reasonable and at the market price.

Pierre Fabre Group commits to comply with national and international regulations concerning publication of its shared interests with health professionals.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

I recently learned that one of our competitors had offered a health professional and their wife plane tickets after the health professional agreed to prescribe one of their products. Can I do the same thing?

No, you cannot offer a health professional anything that might affect their objectivity and result in a conflict of interest. We believe solely in using the quality of our products to convince health professionals to prescribe them. Such practices would be unworthy of the trust our customers and patients place in us.

2.2 GOOD PROMOTIONAL PRACTICES (COMMUNICATION, PROMOTION, SAMPLES)

Pierre Fabre Group promotes its products and communicates with health professionals in an ethical manner in accordance with applicable regulations. We strive to promote our products in line with their validated use.

We take the greatest care to always provide up-to-date, accurate and objective information backed by solid, reliable and sufficiently complete proof to ensure our products are used correctly.

For our drugs, we therefore have a medical business structure adapted to changes in the pharmaceutical market and its products, which also meets the regulatory authorities' quality requirements.

- Our French networks are therefore certified by AFAQ-AFNOR, according to the Charte de la Visite Médicale standard established by the French Haute Autorité de Santé.
- All our networks in France and our international subsidiaries apply the applicable national regulations as well as our Code of Good Promotional Practices.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

I am a Pierre Fabre pharmaceutical representative in France. A doctor asks me to subsidise the purchase of tablet computers for all the professionals at his surgery so he can better explain the pathologies to his patients, show them information useful to their treatment or get them to fill in forms to monitor their symptoms. Given the benefit this new equipment could represent for both doctor and patient, can I agree to this request?

Although this equipment could make the medical exercise easier and be beneficial to the patients, funding of this type would constitute conferring a benefit which, in France in particular, is not authorised for a company that sells reimbursable drugs. You must therefore refuse this request.

I am a pharmaceutical representative and the document I have to present to health professionals on our new product seems too long and complex to me. Can I change it to adapt it to the message I want to deliver during my visit?

The promotional documents available to you to communicate information to health professionals on our products have been drawn up in accordance with current regulations and applicable internal procedures. The messages developed have been validated and selected in line with the product's characteristics and are backed by solid proof. You must never modify these documents or remove certain information contained in them, since it is all important, nor must you use your own slide shows to provide information to health professionals.

If you believe a document is not or no longer appropriate for communication, discuss it with your superior and suggest the changes you feel need to be made based on your experience. He or she can then put these forward to the people responsible for producing and validating the promotional documents in accordance with the applicable procedures and regulatory provisions.

Pierre Fabre Group expects each employee to:

- Only disseminate clear, unambiguous, rigorous, balanced and substantiated promotional material drawn up in accordance with local regulations and validated according to the internal procedures in force.
- Comply with good promotional practices in force, particularly regarding promotional items given to health professionals.
- Comply with current regulations on providing medical samples or samples of other products.



III. ACT ETHICALLY WITH THE PUBLIC AUTHORITIES AND ALL STAKEHOLDERS

Pierre Fabre Group expects each employee to:

- Cooperate fully with the public authorities by providing them with precise, accurate and complete information.
- Report any irregularity in one of the Group's documents to their superior.
- Store the Group's documents according to the applicable procedure.
- Never make facilitation payments to a public official or reserve them any form of direct or indirect benefit, which could in any way influence the way in which they carry out their business.



We act ethically, fairly and professionally in our relationships with all actors present on the market whether they are the public authorities, our partners or the competition.

3.1 RELATIONS WITH THE PUBLIC AUTHORITIES

In most countries where we operate, the public authorities play a major role and are essential to the development of our activity. The way we work with and maintain transparent relationships with these authorities reflects our integrity and ensures our credibility in the eyes of the public.

Pierre Fabre Group complies with the decisions and regulations of the various local, national, European and international authorities.

- As regards controls and investigations, we must always provide these authorities with complete, precise and accurate information.
- We respect all product safety reporting obligations with the relevant authorities.
- We refuse any assimilation or association with a political party regardless of their stance and we neither support nor finance any public entity.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

An administrative investigation will soon be taking place in my department, do I need to refrain from communicating certain documents which I feel do not fully meet the legal obligations?

No, you must always cooperate with the authorities by providing all the requested documents. No documents must be deliberately evaded or destroyed. We must always act with the utmost transparency with the public authorities.

I want to take an active part in the electoral company of a candidate whose ideas I share. Can I do this?

Yes, provided you act exclusively on your own behalf without associating Pierre Fabre Group either directly or indirectly.

3.2 RESPECT FOR OUR PARTNERS

In addition to health professionals, Pierre Fabre Group endeavours to respect all of its partners. We strive to always act ethically and professionally in our business relations by establishing coherent and constructive dialogue.

We work to develop business relations that are profitable for everyone and can bring our partners lasting benefits. We strive to always be fair and honest in our business transactions.

- We implement a responsible purchasing policy by integrating requirements concerning environmental protection, social progress and mutual economic development with our suppliers. We select our suppliers objectively by treating them fairly and respecting tender procedures for all significantly large purchases.
- We protect our partners' confidential information as if it were our own.
- We respect all our commitments to our partners and expect the same rigour, loyalty and ethical commitment from them.
- Because we cannot work with partners whose principles or methods would be incompatible with our own, we encourage them to respect our principles and values with the same vigilance as us, and to contribute together to disseminating good business practices and developing ethics in business relations.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

A potential foreign partner who has responded to a call for tenders refuses to comply with applicable labour law legislation under the pretext of providing products/ services that are cheaper than the competition. What should I do?

Whether in France or abroad, the quest to obtain the best value for money for Pierre Fabre Group must not be to the detriment of complying with the various applicable labour law legislation. Talk to them openly about it, clearly explaining our Group's policy on the matter. Unless they change the way they operate, it is clear that no business relationship can be entered into with this partner.

As part of a call for tenders, it is likely the bidders will communicate confidential information belonging to them which has significant monetary and/or strategic value, what should I do?

Pierre Fabre Group endeavours to respect its partners and establish fair and honest relationships with them; you should suggest signing a confidentiality agreement with them before any confidential information is communicated. The Legal Department of the Group or Branch to which you belong can draft and validate such agreements for you.

Pierre Fabre Group expects each employee to:

- Respect the Pierre Fabre Purchasing Function's code which defines the ethical rules and guides our buyers' conduct by governing relationships with our suppliers.
- Treat suppliers objectively and fairly in tender procedures, by avoiding any form of favouritism or discrimination and always applying the best value for money principle.
- Respect the contractual commitments entered into with our partners.
- Never hesitate to remind our partners of and disseminate our principles and values.
- Report any practices carried out by a partner that conflict with our principles and values to their superior.



Pierre Fabre Group expects each employee to:

- Respect competition laws and regulations.
- Refrain from disparaging the competition.
- Avoid any confidential discussion or discussions on illegal matters with the competition, particularly at professional events, except in precisely defined situations governed by appropriate procedures.
- Not hesitate to contact the Legal Department concerning any doubts they may have about practices encountered or suspected or any question relating to competition law.
- Report any known act of unfair competition that is likely to affect Pierre Fabre Group.



3.3 RESPECT FOR FREE COMPETITION

Many countries and regions have set up legal or regulatory measures aimed at ensuring free trade on the market and preventing or sanctioning a number of practices that would prevent, obstruct or distort competition. These practices can take various forms. It could concern the abuse of a dominant position, vertical agreements with suppliers or customers or even horizontal agreements with the competition (agreements on prices or market sharing for example).

- Irrespective of the country in which we are located, we strive to never infringe these laws and to respect our competitors as we would like them to respect us. Convinced of our ability to stand out on the market through the quality of our products, we act fairly, honestly and with integrity with the competition.
- We never seek to obtain information on our competitors illicitly.
- We avoid all informal contact likely to lead to reprehensible actions that could damage our reputation.
- We remember that violating the competition law can lead to heavy penalties for both the Group and the employee who carried out the offence.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

During a conference, one of our competitors suggested that we reach an agreement over the sharing of certain markets. What should I do?

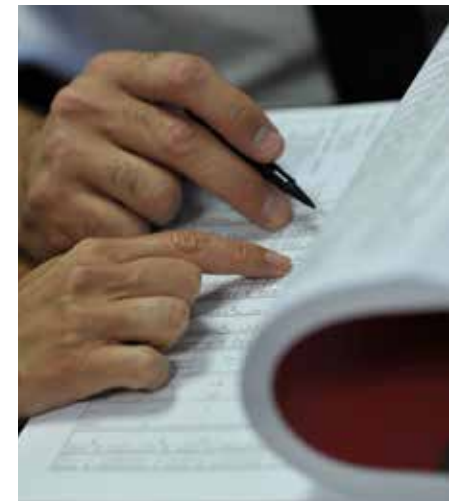
Whether in professional meetings or outside of your work, you must never discuss subjects or information that could be interpreted as or could lead to violation of free competition laws. If you find yourself in such a situation, withdraw yourself from the discussion and if minutes are being taken on the meeting you are attending, ask that your withdrawal be recorded in these minutes. Do not hesitate to consult the Legal Department to find out the applicable laws and regulations on this matter.

A new employee has joined my team after being employed by a direct competitor. Can I ask them to provide me with strategic information on their former employer?

No, Pierre Fabre Group is prohibited from obtaining strategic information on its direct competitors illicitly. Indeed, such acts are often reprehensible in the eyes of the law and could damage its reputation.

Pierre Fabre Group expects each employee to:

- Comply with all applicable legislation and regulations on corruption.
- Never give or accept gifts to obtain or agree on preferential treatment or retain certain contracts.
- Always remember to ask themselves whether or not certain gifts, no matter how small, are acceptable, and always consult their superior in case of doubt.
- Never give or accept bribes.
- Record all transactions carried out with a third party in due form in the accounting records.



Pierre Fabre Group expects each employee to:

- Comply with all applicable legislation and regulations concerning accounting and the publication of accounts.
- Ensure that every transaction they are aware of is duly recorded in the accounting records and books.

3.4 CORRUPTION AND UNFAIR ADVANTAGE

Whether direct or indirect (through a third party), active or passive, Pierre Fabre Group strongly condemns any form of corruption, both in our relationships with the public authorities and in our private relationships with our different partners (suppliers, health professionals, patient groups). It is therefore forbidden to give or receive any unfair advantage, bribe or monetary payment.

- Giving and accepting gifts is prohibited. However, provided a number of conditions are met, symbolic gifts may be allowed. In addition to being modest, the gesture must comply with both local regulations and the standards imposed by the main countries in which we develop our activities, be made transparently and not influence the receiver to make a favourable decision towards the giver. Any person working in the name of or on behalf of Pierre Fabre Group must scrupulously abide by these rules.
- It is important to always bear in mind that behaviour aimed at illegally or illicitly influencing the representative of any authority or partner, risks damaging our image long term. Irrespective of the country in which they take place, such gestures may also result in heavy penalties.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

At the signing of a contract, one of our partners wanted to offer me a gift of considerable value. Not wanting to risk compromising the good relationship we have established, I am wondering what I should do in such a situation?

In principle, you should politely refuse this type of gift, explaining the Group's policy on the matter. However, with certain countries and customs refusing such a gift can sometimes be tricky. In this case, inform your superior who will decide on the right behaviour to adopt. They may

decide it is acceptable to share the gift with all the employees or give it to a charity.

One of the group's major suppliers is holding a reception for the opening of its new factory. Business people, politicians and officials are all invited to this reception. Can I accept the invitation I received as one of the Group's representatives?

Yes, provided you have told your superior about this invitation and obtained their prior agreement to attend.

3.5 FINANCIAL DOCUMENTS

Pierre Fabre Group commits to ensure that all the financial information it communicates in any form (annual reports, financial reports, press releases, public presentations) in connection with its activities is accurate, true and relevant.

We keep all our accounting documents in accordance with applicable legislation, all payments and movements of income we make are recorded appropriately and clearly in our accounts and we fulfil our tax obligations with the utmost rigour.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

While consolidating sales reports for presentation to the auditors in respect of the year-end closing of accounts, I notice an error in the figures. What should I do?

Any financial inaccuracy that affects the regularity and accuracy of our accounts must be brought to the attention of your superior or chief financial officer so it can be corrected immediately, should confirmation be necessary.

Pierre Fabre Group expects each employee to:

- Comply with all environmental rules and procedures.
- Develop a sense of responsibility by actively contributing to improve and reduce the environmental impact of their daily activity.
- Report any problem that could pose a risk to the environment by informing their superior or any other person authorised to deal with the matter.
- Promote with suppliers and partners the importance of abiding by environmental protection rules.



IV. BE A SOCIALLY RESPONSIBLE COMPANY COMMITTED TO PRESERVING THE ENVIRONMENT

At each stage in our industrial process, we seek out ways to limit the environmental impact of our activities by marrying economic performance with environmental preservation. We conceive of and develop innovative solutions by drawing a never-ending source of inspiration from nature and plants.

4.1 LIMIT OUR ENVIRONMENTAL IMPACTS

Environmental protection is a major concern for Pierre Fabre Group in all its activities and locations and it strives to always comply with all environmental standards and legislation that apply to it. We endeavour to reduce our environmental footprint throughout the life cycle of our products and in our everyday conduct in all our fields of expertise.

To achieve this we:

- To achieve this we:
 - Encourage energy and water saving
 - Try to use renewable energies and materials
 - Reduce our waste as much as possible
 - Encourage water and waste recycling
 - Limit all forms of pollution whether water, air or land
- Adopt the principles of green chemistry in the manufacture of our active ingredients to reduce the environmental footprint of our manufacturing processes
- Promote environmentally-friendly behaviour through our codes of good practice and by educating our staff
- Encourage integrated farming and organic farming
- Ensure the sustainability of the natural resources we use
- Favour short circuits for our product production by using local suppliers as much as possible
- Communicate on all our environmental commitments and actions
- Strive to identify, limit and control environmental risks as quickly as possible in order to adopt the appropriate measures without delay.
- Make eco-design a priority in the development of our formulas and packaging. We work to reduce and recycle our packaging and to develop eco-designed formulas. Our concern for the environment in our product development does not, however, compromise their safety and effectiveness, as required by our pharmaceutical culture.
- Demonstrate our achievements by obtaining certifications or undergoing regular assessments with independent bodies (ISO certifications, AFAQ 26000 assessment).

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

I sometimes have to travel to attend business meetings where my physical presence is not really necessary. What are the alternatives to attending these meetings?

When you need to meet with more than one person in a meeting and a telephone conversation or e-mail is not therefore an option, you could use videoconferencing. As well as saving you precious time, this solution avoids needless travel and helps reduce our environmental impact resulting directly from our activities.

Every day as a Pierre Fabre employee in France, I have to travel a considerable distance to journey to and from my place of work. I am aware of the environmental impact this has and would like to know if there are any alternatives.

Many employees make the same journeys every day. To reduce the cost of this travel for each person and help limit our environmental impacts, in France we have set up a user-friendly car sharing service to help you quickly find people at Pierre Fabre with whom you can car share. Visit the <https://www.covoituragepierrefabre.com/> website to find out more.



Pierre Fabre Group expects each employee to:

- Always comply with applicable national and international standards on the protection of natural resources.
- Report to their superior any act or event within the Group that could be detrimental to the preservation of natural resources.

4.2 PROMOTE GOOD USE OF NATURAL RESOURCES

Convinced of both the therapeutic and cosmetological potential of plants and the need to preserve them, our company implements an approach that ensures the responsible development of innovative, safe and effective plant active ingredients. This approach called "Botanical Expertise Pierre Fabre" recognised by the European EFQM label, is based upon four principles: Innovating, Preserving, Respecting and Guaranteeing.

The preservation of biodiversity is not only a common concern of humankind, but a priority for Pierre Fabre Group, which strives to never lose sight of this objective.

- We respect the Rio Convention on Biodiversity, the Nagoya Protocol on Access to Genetic Resources and the Fair and Equitable Sharing of Benefits Arising from their Utilization and the Washington Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).
- We are developing biodiversity projects with reforestation actions in Madagascar, actions to protect endangered plants, the plantation of desert date palms in the Sub-Saharan belt and the restoration or set-up of botanical conservatories.
- When we use plant substances in our products, we use reasonable procurement methods, that respect the local populations and environments.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

Having been informed of Pierre Fabre Group's actions on the preservation of natural resources, I have nonetheless heard rumours suggesting that some of the plants used by the Group were cultivated with GMO products. Is this possible? Should I report it?

Pierre Fabre Group is prohibited from using GMO plants in its cultivation. Moreover, the supply of 99% of the plants the Group uses has no impact on the sustainability of the resources and 90% of the plants it uses are cultivated without the use of chemical pesticides or in accordance with organic farming standards. We are incredibly strict about preserving the environment and plant heritage, but if despite this you receive information to the contrary, tell your superior who will inform the control staff.

During my holidays to the Caribbean, I came across a plant that appeared to have interesting properties and whose virtues are renowned by the local population. Can I bring back samples and seeds to study in my laboratory?

There are international conventions like the CITES Convention governing plant imports and exports, and certain plants are listed and protected in this Convention. Moreover, even in countries that have no specific regulations of their own, there are international provisions in place that may impose strict rules concerning access to these resources, the traceability of their use and sharing the benefits derived from them with the local communities. This is the outcome of the Nagoya Protocol that recently came into force in Europe and which applies to around fifty other signatory countries. It is therefore essential to take these provisions into account and comply with them when a biological resource is sampled in any country (including French territories and French overseas departments and territories) with a view to being used by the company, even for research purposes.

V. RECOGNISE THE IMPORTANCE OF OUR EMPLOYEES WHO PLAY A CRUCIAL ROLE IN THE SUCCESS OF OUR DEVELOPMENT AND COMMITMENTS

Pierre Fabre Group expects each employee to:

- Adopt respectful behaviour that displays no form of discrimination or harassment towards an employee or third party.
- Show open-mindedness, courtesy and consideration.
- Treat the people around them the way they would like to be treated.
- In line with their training and potential, look after their own health and safety and that of their colleagues and inform human resources of any situation that is not up to standard, whether they are a victim or witness of it, relying on firm evidence that can be objectively verified.
- Acknowledge the work of each of their colleagues purely at fair value based on its quality and the results achieved.



It is our 10,000 employees spread across more than 45 countries who uphold our values in practice and develop our activity day-to-day. Recruiting, developing, training, providing a working environment conducive to well-being, inspiring loyalty: the Human Resources Department supports the growth of both the company and its employees in their current and future challenges.

5.1 RESPECT FOR PEOPLE

Keen to ensure the well-being of its employees, Pierre Fabre Group complies with all applicable labour law social standards and the major international legislation like the International Labour Organization conventions.

We are convinced that a pleasant working environment that respects individuals benefits everyone and generates greater efficiency and productivity for Pierre Fabre Group.

We work to ensure that every employee can flourish in their work without suffering discrimination, whether relating to their gender, race, religion, origins, age, political persuasion, sexual preference, physical appearance, state of health or disability.

Each and every one of us is entitled to respect and dignity and we condemn any form of psychological or sexual harassment. We therefore remind all staff that any behaviour aimed at or having the effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment is unacceptable.

- We prohibit any form of harassment and any form of discrimination other than that which could aim to re-establish a balance in favour of a minority in accordance with the law, and we stress the importance of mutual respect, loyalty, solidarity and trust among employees.
- When an employee becomes aware of or is a victim of this type of treatment, they must raise the matter immediately and contact their superior or Human Resources Department.

In addition to prohibiting this behaviour, we believe in the importance of cultivating each person's range of talents and skills and more than anything it is our wish to develop our employees' capabilities. The employability of our employees is a major component of our human resources policy. Pierre Fabre Group wishes to promote the human dimension of each of its areas of expertise. Open-mindedness, rigour and a results-driven approach are qualities we hope to find in all our employees.

- We guarantee equal opportunities and treat every employee fairly and with respect in their prospective career development and extend this treatment to any person wishing to join us.
- We commit to supporting the development of all our employees with an ambitious training policy.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

A colleague in my department receives constant inappropriate criticism from our superior yet she produces quality work. What should I do?

A superior must always direct, manage and motivate their team. They must not, however, abuse their authority and act maliciously by using hurtful remarks. We want every employee to be able to work in a pleasant environment where respect is a given. If you believe your superior is going beyond his or her prerogatives and is creating an unpleasant working environment, try to discuss it openly with them. Failing this, inform the Human Resources Department.

When selecting an applicant to replace an employee on maternity leave, I was implicitly asked to avoid recruiting a disabled person who was likely to be less efficient than an able-bodied person. Should I conform to this request?

No, Pierre Fabre Group condemns any form of discrimination whether in the applicant selection process or in the exercise of employees' work itself. Applicants must be selected based purely on objective criteria relating to their skills and qualities. It is therefore strictly forbidden to take such considerations into account.



5.2 RESPECT FOR PRIVATE LIFE

A growing global concern is the protection of people's private lives, particularly their personal data. The notion of personal data must be understood as any information given to Pierre Fabre Group in connection with an identifiable individual, whether this is an employee, patient, customer or partner.

Pierre Fabre Group takes this responsibility seriously and ensures all its employees exercise caution and take all necessary precautions regarding the protection and use of this information. Unauthorised disclosure or transmission of this information to people outside the company is strictly prohibited. Equally, distribution of this data to an employee must be limited to the people who have a legitimate need to know this information. Use of this information must also comply with its authorised or declared use.

- We never hold information on people in conditions that could be considered unlawful.
- We clearly explain to the people whose personal data we hold how this information may be used. Everyone has the individual right of control over the collection, treatment, use, dissemination and storage of their data, in accordance with applicable legislation and regulations. We undertake to only use this information for a specific and legitimate purpose and never store it for longer than necessary.
- More generally, Pierre Fabre Group is committed to respecting the intimacy and private lives of all its employees and any third parties we have dealings with.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

One of my colleagues recently had an operation. I wanted to send him a message to wish him well in his recovery, but I was not allowed to obtain his address. What can I do?

It is important to remember that every employee is entitled to have their private life respected and may not necessarily want their address to be accessible to and freely known by everyone. Speak to Human Resources who may agree to pass on your message without giving out your colleague's address directly.

Pierre Fabre Group expects each employee to:

- Comply with all legislation and regulations on personal data protection including those concerning data collection, files, personal data processing and the transfer of such data to another country.
- Protect personal data to prevent any accidental unauthorised disclosure.
- Allow the people whose information we hold to access and modify it in accordance with their rights.
- Never collect more personal information than necessary, nor store it for longer than necessary.
- Report any theft, loss or unauthorised disclosure of personal data.

Pierre Fabre Group expects each employee to:

- Comply with local legislation and regulations and all health and safety procedures and instructions established by Pierre Fabre Group.
- Keep abreast of any changes or updates to the safety rules.
- Not carry out any task that poses a potential risk for which they have not received appropriate training.
- Not enter areas for which they do not have the appropriate authorisation.
- Never be under the influence of alcohol or drugs in their place of work.
- Report any incident or hazard to their superior as soon as possible.
- Contribute actively to risk reduction by sharing their ideas.



5.3 COMPLIANCE WITH HEALTH AND SAFETY LEGISLATION

The company's mission, which is to provide safe and effective responses to customer and patient expectations regarding health and well-being, means that safety will always be a central concern. It is therefore only logical that Pierre Fabre Group commits to providing a safe and healthy working environment with measures to prevent accidents in the workplace and occupational injuries and diseases.

All employees must be able to work in an environment that poses no threat to their health or safety.

- We strive to protect everyone by disseminating and constantly developing a culture of safety within our teams. This approach involves awareness raising and continuous training for our employees.
- We assess and identify both physical and chemical risks so we can put appropriate prevention measures in place. If a risk arises, we commit to acting efficiently and quickly to put the required corrective measures in place without delay.
- We remind our employees that alcohol consumption is regulated according to the applicable legislation and regulations.
- We encourage each of our employees to raise any concerns they have to improve safety within Pierre Fabre Group as much as possible. Our employees must never hesitate to report any problem or event likely to pose a danger to either their own safety or that of their colleagues.

QUESTION / ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

When required to attend meetings between different Pierre Fabre sites, I have sometimes found it difficult to arrive on time without exceeding the authorised speed limits. Should I flout these rules and put my business meetings first?

No, employee safety is one of our major concerns, punctuality can never justify violating road safety rules. As much as possible, try to organise your meetings to leave you enough travel time.

Pierre Fabre Group expects each employee to:

- Avoid any situation that could place them or a third party in a conflict of interest situation.
- Report the existence of a conflict of interests, even if only potential, to their superior as soon as possible.
- Never allow their personal interests or those of their friends and family to take precedence over those of Pierre Fabre Group.
- Not take advantage of their position within Pierre Fabre Group to procure for themselves or allow third parties to benefit from unfair advantages.
- Not use confidential information acquired in their line of work for personal purposes or to assist their friends or family in any way.
- Politely refuse any advantage, good or service from a partner, supplier or customer that could affect the objectivity of their professional decisions.



5.4 CONFLICTS OF INTEREST

A conflict of interests, whether potential or real, can seriously damage Pierre Fabre Group's reputation. Such conflicts are likely to happen when an employee finds themselves in a situation where their personal, social, financial or political interests affect their judgement and they can no longer objectively serve the company's interests.

The notion of personal interest should be understood in its broad sense and cover diverse and varied situations. Relationships with close friends or family members are often the cause of such situations, particularly when it concerns hiring or entering into a contract with one of these people. Moreover, any financial interest, whether it concerns investments or personal transactions and whether with a competitor, supplier or customer may result in a conflict of interests. Lastly, when a person has or wants to take a second job, if this is authorised by the employment contract with the company, this activity must always be reported to their superior beforehand.

A conflict of interests, therefore, is not necessarily insurmountable; the important thing is that employees must always inform their superior to see if a solution can be found for this situation. It will then be necessary to decide whether a person should be taken off a case or negotiation or if it is possible to authorise them to continue their activity provided they respect certain precautions or adaptations.

- We must ensure the decisions we make are not influenced by our own interests, but are made solely in the interests of Pierre Fabre Group.
- We all have a duty to report such a situation, even if only potential, to our superior and refrain from acting until the problem is settled.

QUESTION / ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

My brother has just launched his business and wants to offer his services to Pierre Fabre Group. He is offering very attractive rates compared with the competition. Can I recommend him to the Management?

Whether or not this may be considered a good offer, it is important to always point out any conflict of interests, even potential, such as a family connection as soon as possible. Your

brother's offer will not be excluded and will be examined objectively like all the others. This kind of family connection will have no bearing on the company's decision, favourable or otherwise. It goes without saying that you must refrain from taking part in any decision-making process remotely connected with your brother's business.

VI. PROTECT OUR ASSETS TO GUARANTEE OUR COMPANY'S LONG-TERM SUCCESS

Pierre Fabre Group expects each employee to:

- Avoid using the company's goods and resources for personal use.
- Remove any of the company's goods from the premises without authorisation.
- Not use any unauthorised device to work on information or documents belonging to Pierre Fabre Group without prior authorisation from their superior.
- Take care of the equipment entrusted to them as if it were their own.
- Respect the company premises and their workplace.
- Report any damage to, loss or theft of equipment to their superior.



Whether it concerns the company's physical assets, sensitive data, intellectual property rights or simply the company's image, our assets enable us to ensure our future economic development. Protecting our assets means first and foremost guaranteeing our future.

6.1 USE OF THE COMPANY'S GOODS

We provide our employees with access to various tools and equipment so they can carry out their professional activities in the best possible conditions.

- Each employee must endeavour to use these resources correctly and for strictly professional purposes that serve the interests of Pierre Fabre Group.
- However, in exceptional circumstances we do allow employees to use certain tools like e-mail for personal use provided it does not affect the employee's work or the smooth running of the information system and it poses no threat to the company's image.
- We must all take care of the company's equipment and endeavour to protect it and preserve its integrity.
- We must never damage, lose, use to our advantage or waste the company's goods and resources.

QUESTION / ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

One of my friends, who has just launched his business, has asked me to print his posters because he does not have a printer of his own yet. Can I help him by using the office printer outside my work hours?

The goods and resources made available to Pierre Fabre employees are intended exclusively for professional use that must serve

Pierre Fabre Group's interests. Whether for your own needs or to help a friend or family member, these goods can under no circumstances be used for personal purposes, even outside your work hours. However, in exceptional circumstances to help in an emergency situation, such use may be permitted, although this is not the case here.

6.2 PROTECTION OF SENSITIVE/CONFIDENTIAL INFORMATION

Any person working for our Group can gain access a degree of confidential information, i.e. information that has not yet been made public which may be of considerable value. This information may concern acquisitions, financial results, marketing and commercial operations or even the results of clinical trials, for instance.

Whatever the nature of this information or the media used, each employee must be aware of the detrimental effects voluntary or accidental disclosure of such data would have on the company.

When this non-public information concerns or involves some of our partners and is likely to affect the value of their listed securities, the employee in possession of this information has insider status. Caution and discretion are essential in such situations if we do not want to be the cause of insider trading, which could have sizeable penalties for the company and the insider employee.

Consequently:

- We protect the Group's sensitive information by conscientiously abiding by the storage, distribution, reproduction and destruction rules applicable to this data.
- We preserve the confidentiality of the confidential information we are given by third parties, which we protect as if it were our own information, and we only use it for the purposes for which it was given to us.



QUESTION / ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

During lunch at a restaurant, one of my colleagues discusses an as yet unpublicised important research project, is this careless of him?

It is crucial to always be as discrete and cautious as possible when bringing up confidential subjects in a public place like a

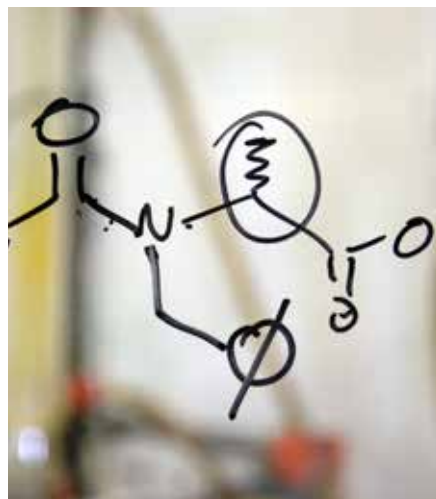
train station, airport, restaurant, hotel or on public transport. Whether during a business meal or outside of work, the company's confidential information must always be protected, everyone must avoid accidentally disclosing such information, which could be detrimental to the Group.

Pierre Fabre Group expects each employee to:

- Protect and prevent any disclosure of confidential information belonging to the Group or third parties.
- Limit the communication of confidential information to only those people who need to know it.
- Be extra diligent with confidential information when they are in a public place.
- Apply the confidentiality management good practices disseminated within the Group and electronic communication good practices.

Pierre Fabre Group expects each employee to:

- Strive to protect the company's intellectual property rights by refraining from communicating on our research and development work or projects in progress unless they are certain patent applications have been made or other rights put in place enabling the company to conserve exclusive rights to them.
- Take particular care to comply with the Group's procedures on the registration of research and development data and publication.
- Strive to protect the company's intellectual property rights by reporting any fraudulent or inappropriate use they are aware of.
- Respect the intellectual property rights of third parties and not hesitate to contact the Legal and Intellectual Property Department if necessary.
- Not use or install software that has not been approved by the IT Department or for which we do not hold a user licence.



6.3 PROTECTION OF INTELLECTUAL PROPERTY

Because research and innovation are the keys to our success, Pierre Fabre Group's intellectual property rights represent intangible assets, an essential part of its heritage which everyone has a duty to protect and use appropriately. These assets include all patents, designs, brands, domain names, copyrights and other scientific knowledge belonging to our company and which represent precious competitive advantages.

- We respect the intellectual property rights of third parties by refraining from any action or practice likely to be detrimental to our competitors' or partners' intangible rights.
- We encourage the development of a legal and regulatory framework that guarantees the effective protection of intellectual property and are committed to preventing the growing problem of counterfeit products that pose a considerable risk to the health and safety of our patients and customers.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

I am currently working on a research project that is in the process of being finalised and which I will soon have to present at a conference. Should I take specific precautions?

It is essential to always make enquiries with the Intellectual Property Department to find out if protection is necessary and whether it has been put in place. Failure to do so could compromise all the investment efforts made and Pierre Fabre Group could lose its exclusive exploitation right. In light of these consequences, you should always be very careful about discussing Pierre Fabre projects at a professional event.

I work in the department that deals with promotional items. At a show, I saw a bag design that would really suit the upcoming campaign I am working on, my manager really liked the photo I took with my phone, but told me it is too expensive. Can I get one of our current sub-contractors to make it who will surely make it at a better price?

Designs of leather goods are very often protected by their designer and copying them therefore infringes their rights. It is therefore necessary to obtain this designer's written agreement before reproducing their design. We would face legal action if we had this item manufactured by a subcontractor without this agreement.

6.4 PROTECTION OF THE CORPORATE IMAGE

Pierre Fabre Group protects its reputation and asks each of its employees to refrain from speaking on the company's behalf without its prior authorisation.

- We are well aware of the importance of developing online social networks and fully respect the right of all employees to express themselves and share their ideas and opinions. Nonetheless, we remind our employees to always be discreet and avoid any situation that could lead people to believe that the opinions expressed by an employee represent those of Pierre Fabre Group.
- We must all bear in mind that our Group's image depends directly on the behaviour of each and every one of our employees. We want to maintain this image and ensure each employee can feel proud to belong to Pierre Fabre Group.

QUESTION ANSWER

COMPLIANCE WITH THE CODE IN PRACTICE:

Proud to have participated in the creation of a Pierre Fabre product, I would like to praise its virtues on my personal blog which has many followers. Can I do this?

While your intentions may be good, we recommend you exercise the greatest caution when discussing your work or a Pierre Fabre product. The promotion of Pierre Fabre's

products is a job reserved for employees who have been specifically trained in communication. Moreover, the dissemination of seemingly inoffensive information can sometimes cause many problems for our Group. Where possible you must therefore avoid indulging in such activities.

Pierre Fabre Group expects each employee to:

- Not speak on the company's behalf without its authorisation.
- Not disparage an employee, a Group representative, the company or one of its products on social networks or any other media.
- Avoid commenting on the official declarations of Pierre Fabre Group or its partners.
- Respect the Group's image and values.
- Report any action or remark that could damage the Group's reputation.



ALERT SYSTEM

- Each employee faced with a situation likely to violate the principles set out in this Code is free to report their suspicion to the Group's Ethics Division.
- Therefore, each Pierre Fabre Group employee who is aware of a situation or behaviour that violates or is likely to violate in particular the accounting, financial, internal control, competition, corruption prevention, discrimination prevention or harassment at work rules, or the hygiene, health, safety and environmental protection rules is asked to report it to the Group's Ethics Division based at the head office in France:
 - By telephone: + 33 5 63 71 44 46
 - By e-mail: compliance.pf@pierre-fabre.com

This system is also available to any employee needing help or advice regarding the Code's content or its application methods.

- Reporting a violation is a duty, however, an employee cannot be criticized for not doing so.
- Employees are asked to not act anonymously to avoid any abuse in the use of the alert system and to protect the employee who reported the issue.
- Reported incidents will be treated in strict confidentiality and with the greatest of care by the Group's Ethics Division which will investigate the facts in the report case with the help of any other department deemed necessary, specifically the Internal Audit Department.
- The information collected will be stored until the conclusion of any potential disciplinary proceedings or litigation. In the absence of proceedings, the information will be stored for a period of two months from the date the report was made.
- If after investigation the facts reported are shown not to violate the provisions set out in the Code of Ethics and the employee who reported the issue did so in good faith without harmful intent, no disciplinary measure can be taken against them.
- After the potential implementation of precautionary measures, particularly to prevent proof relating to an alert from being destroyed, the employees targeted by the report made will be notified and they are entitled to access and rectify the information held about them in the event of an error, without them being able to discover the identity of the person who reported the issue.
- Pierre Fabre Group agrees to take appropriate disciplinary measures and undertake any necessary judicial proceedings to prevent or stop any event that constitutes a violation of the provisions of the Code of Ethics.



Pierre Fabre