



Pierre Fabre

CODE OF CONDUCT

TACKLING CORRUPTION
PREVENTING CONFLICT OF INTERESTS

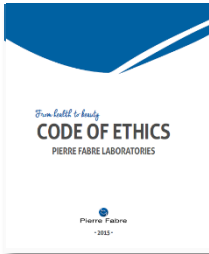
May 2021

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INTRODUCTION



In March 2015, the Pierre Fabre Group adopted a Code of Ethics covering all of its activities and the areas in which it operates

This Code was developed to clarify the rules each employee must follow to ensure that they act and make decisions responsibly when performing their day-to-day tasks and activities.

As such, beyond merely complying with legislation and applicable regulations, this Code of Ethics should help each person use good judgement and adopt the expected appropriate ethical behavior, a reflection of the Pierre Fabre Group's vision and values as part of an on-going quest for sustainable development.

In particular, the Code serves as a reminder that the Pierre Fabre Group strictly condemns any form of Corruption and has included preventing conflicts of interest among its good governance aims.

WHY THIS CODE OF CONDUCT?

The purpose of this Code of Conduct is, on the one hand to help employees in the Pierre Fabre Group identify various types of behavior that should be prohibited, and which are likely to be seen as Corruption or influence-peddling or attempts to corrupt by applying international agreements or applicable national legislation, and, on the other hand to prevent conflicts of

Interest which may result in Corruption. This Code sets out to enable employees to behave and make decisions in ways that are in compliance with the stipulations detailed in the Code of Ethics. It helps them to apply it in practical terms, so that Corruption and influence-peddling may be avoided and conflicts of interest prevented.

WHO IS IT AIMED AT?

Role of the 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.

This Code is incorporated into the internal regulations of each of the Group's entities

in France, as well as into those of countries which have similar regulations. It must be implemented at local level by the Group's various entities, in their respective territories in which they are located. As such, any act of Corruption committed by an employee of the Pierre Fabre Group would expose him or her to disciplinary measures.

Role of managers

Designed for all of the Group's employees, this Code is especially aimed at the managers upon whom the Code of Ethics confers particular responsibility as far as compliance with the Group's ethical principles is concerned – given their roles as line managers.

As far as tackling Corruption, tackling influence-peddling and preventing conflicts of interest in particular are

concerned, in addition to the exemplary behavior that they must demonstrate on a day-to-day basis in this regard, managers must be fully attentive to their employees' concerns and provide them with the support they need in situations which may sometimes be delicate to manage, drawing on this Code in order to do so.

Specific local applications

Finally, as an instrument of the Code of Ethics, it must be implemented at local level by the Group's various entities, in their respective territories in which they are located.

However, regarding compliance with national anti-Corruption and influence-

peddling legislation, each entity is free to implement this Code and supplement it with special measures designed to tackle Corruption and influence-peddling at local level. Doing so does not entitle it to omit any of the provisions from this Code.

HOW TO USE THIS CODE OF CONDUCT?

What use?

Each employee is invited to keep a copy of the Code of Conduct for himself as a reference document in order to find answers to their daily questions.

This Code should enable everyone to ask

themselves what attitude to adopt in delicate situations that may arise in both internal and external relations.

What are the limits?

This Code of Conduct is not designed to provide solutions to all examples of Corruption, Corruption attempts, influence-peddling and potential conflicts of interest that Pierre Fabre employees may have to tackle within the course of their work.

Its purpose is to help employees get into the right habits so that they can conduct themselves with integrity – as the Code of Ethics requires - and so prevent Corruption or influence-peddling across the Pierre Fabre Group.



WHO TO CONTACT?

Pierre Fabre Group has provided all of its employees with an Alert System. This is an integral part of the Code of Ethics and enables employees to get help and advice for tackling all forms of Corruption or influence-peddling and for preventing conflict of interest.

All Pierre Fabre Group employees are therefore invited – whenever necessary – to use this system. They are reminded that they can also seek advice from line manager, the Human Resources Department, the appropriate Legal Department for their particular activity or even – for Group entities outside France – the Compliance Officer or the ethics and compliance referent appointed by the Group’s Ethics & Compliance Department. **The Alert System is to be used when the situation demands it.**



REMINDER

Group Internal Alert System*

- By phone: + 33 5 63 71 44 46
- By mail: compliance.pf@pierre-fabre.com

***Local alert system may also exist, please verify with local compliance officers/referents**

RULES



FIGHT AGAINST CORRUPTION

1.1. Definitions

For the purpose of this Code, the following definitions apply:

CORRUPTION

Dealings whereby a person who has been given a particular role – either public or private – solicits or accepts a Gift, an offer or a promise designed to make them carry out, postpone or omit to carry out an act which – either directly or indirectly – is connected with their responsibilities.

Corruption therefore involves a violation by the guilty party of the responsibilities with which they have been entrusted.

Corruption can be active or passive, direct or indirect.

ACTIVE CORRUPTION

A natural person or legal entity obtaining or attempting to

obtain – in exchange for Gifts – promises or advantages from a person performing a public or private role, such that they carry out or postpone an act that is connected with their role or an act that is facilitated by their role, or such that they omit to carry out the aforementioned act, the third party receiving the name of the corrupting party.

Example: Offering an employee of a national health authority a sum of money in return for having a health product registered or securing a market permit for it or speeding up the processes involved in doing so.

PASSIVE CORRUPTION

A person performing a public or

private role taking advantage of this role by soliciting or accepting Gifts, promises or advantages designed to make them carry out an act connected with their role, this person receiving the name of the corrupted party.

Example: Within the framework of an Invitation to tender, the representative of a supplier offers one of the Pierre Fabre Group's buyers a sum of money or a personal service in return for being awarded the contract. Here the passive Corruption applies to the Group's buyer.

DIRECT CORRUPTION

The corrupted or corrupting party directly soliciting or offering an advantage, without recourse to an intermediary party.

INDIRECT CORRUPTION

The corrupted or corrupting party directly soliciting or offering an advantage via an intermediary party.

Example: contacting an intermediary party – who is either remunerated or otherwise – to corrupt a public official such that they make favorable changes to the conclusions of a regulatory inspection

AVANTAGES

Direct advantages (examples: goods in kind, sums of money, granting of a loan or opening of a line of credit, performance of

a task for free, discount, etc.) or indirect advantages (examples: writing off of a debt, employment of a close friend or relative, etc.) sometimes obtained through the intervention of a third party, either in good or bad faith.

PUBLIC OFFICIAL

- Any person with a legislative, executive, administrative or judiciary mandate belonging to a state or a supranational entity, appointed or elected, on either a permanent or temporary basis, be they remunerated or non-remunerated, and irrespective of their hierarchical level.
- Any other person who performs a public function, including for a public body or a public company, or who provides a public service, such that these terms are defined under the provisions of a state's internal legal system (for example, a private practitioner undertaking work in a public health center).
- Any other person defined as a «public official» under the provisions of a state's internal legal system.

1.2. Different forms of Corruption

Corruption is not just about money! The most obvious form of Corruption is bribery, but Corruption can take a number of different forms which are prevalent to varying degrees. Below is a list of the most common forms. **They are all prohibited by the applicable regulations in force and by the Pierre Fabre Group.**

Bonus and Bribe

Any Gift or sum of money offered to a public official or an employee as remuneration for a «service» rendered to the corrupting party, in violation of their employment terms or the responsibilities with which they have been entrusted.

String-Pulling

Favor granted – in a way that is an abuse of one’s position – in return for a «service» rendered. An example might be providing the relative of a public official with employment in order to secure preferential treatment from them (e.g.: obtaining administrative authorization).

Unjustified payment for a public service

Making payment to a public official even though the task which they are being asked to carry out is supposed to be carried out free of charge in application of the law (*).

() this type of Corruption is also known as «facilitation payment» and is prohibited under the legislation of most countries. It is authorized in some countries, provided that the payments in question are routine payments made in order to speed up the performance of a particular action.*

Traffic of influence

For a public official, involves receiving Donations from a natural or legal person in exchange for granting various advantages or promising to grant various advantages.

Example: promising an advantage to an elected representative such that they will use their influence in order to obtain an administrative permit.

Toll exaction

A form of extortion. For example, a public official might demand a sum of money in return for not performing a particular act which might prevent a dossier from being processed.

1.3. Identify a case of Corruption

It is illegal to solicit, receive, accept, offer, or pay a bribe. **Even if the exchange of Gift/Invitation is a common use in commercial relationships, key factors must be analyzed in such a situation.**

The adequation

Although a Gift / Invitation may be offered or received in good faith, it can only be acceptable if it is reasonable, adequate, and usual for this type of relationship and if it makes no exception to the Gift and Invitation policy.

The third party

Regulations regarding Gifts is even stricter when the third party is a government representative or a public agent.

The perception

The impression that an inappropriate Gift gives can seriously damage the reputation of our company. The credibility of the strategic and commercial decisions that any employee takes depends on its acts.

A third party's intervention

Any employee or company that does not prevent a third party acting on their behalf from engaging himself in acts of Corruption commits an offense.

The intention

To accept a Gift or an Invitation to unduly influence a decision in a business relationship is equivalent to accepting an undue advantage.



1.4. Risks incurred

Tackling Corruption has become a priority for countries and is also the focus of a great deal of international effort. As a result, the Corruption of public national (or even foreign) officials by the application of international conventions is condemned and is being cracked down on by several national laws. This condemnation has been extended in many countries to include Corruption which might occur between individuals and private companies.

In addition to the risk of heavy judicial and administrative sanctions (fines, prison

sentences, for natural and legal persons, authorization that has been granted being revoked, having to reimburse benefits obtained, being temporarily or permanently removed from lists of public procurement providers, etc.), there are risks of damage to the company's reputation and image, resulting in confidence being lost in all of its stakeholders. This may negatively impact its growth in the country in which these acts of Corruption occur and sometimes beyond, in compliance with applicable national legislation.

As the Group's Code of Ethics confirms in paragraph 2.3:

“Corruption and unfair advantages”: «It is important to always bear in mind that behavior designed to illegally or illicitly influence the representative of any authority or partner risks damaging our image in the long term. Irrespective of the country in which they take place, such acts may also result in heavy penalties. »

Finally, any employee of the Pierre Fabre Group who is found to have committed an act of Corruption or engaged in influence-peddling will be subject to disciplinary and/or penal measures.

Pierre Fabre Group expects each employee to:

- Complies with all applicable laws and regulations regarding the fight against corruption and influence peddling,
- Never pay or accept any illicit commission, bribe or other form of remuneration or gift that could be qualified as corruption, active or passive, direct or indirect (plunger, undue retribution, tribute or toll...) or influence peddling,
- Be attentive to unusual requests and be surprised by abnormal and complex situations during a transaction,
- Record all transactions carried out with a third party in due form in the accounting books records.



PREVENTING CONFLICT OF INTERESTS

A Conflict of Interest is any situation in which the personal interests of a Pierre Fabre Group employee may come into conflict with those of the company.

A potential or real conflict of interests can therefore seriously damage the Pierre Fabre Group's reputation. Such conflicts are likely to occur when an employee finds him or herself in a situation in which their personal, social, financial, or political interests affect their judgement and no longer serve the company's interests.



2.1. Definitions

Three main criteria should be taken into consideration in order to determine whether or not a situation presents a conflict of interest:

- **The employee needs to have an interest**

This interest can be direct (another professional activity) or indirect (a spouse's professional activity), private (holding shares in a company) or public (holding political office), material (remuneration) or moral (a voluntary activity or honorary role).

- **This interest must interfere with the tasks entrusted to the employee**

The interference may be material (for example: an activity that is in direct competition with the Group's) or temporal (for example: previous interests).

- **This interference must influence or appear to influence the objective performance of the tasks entrusted to the employee who is required to act for the sole benefit of the Pierre Fabre Group**

This criterion involves examining the intensity of the interference on a case-by-case basis: there is a Conflict of Interest when there is enough interference to raise reasonable doubts about the employee's ability to perform their tasks completely objectively.

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 as soon as possible the existence of a conflict of interests, even if only potential, to their superior or the Human Resources Department, or Legal Department or Compliance Officer or Ethics and Compliance Department,
- 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 their objectivity.

2.2. Management of actual or potential Conflict of Interests

However, if there is a conflict of interest, it is not necessarily insurmountable. The important thing is to always inform one's line manager in order to determine whether or not it is possible to remedy the situation such that a conflict of interests is prevented or stopped.

The process of management and prevention of actual or potential conflicts of interest has been defined and detailed in the procedure "**Prevent and manage Conflicts of Interest**".

Available on [Ethics and Compliance Portal](#)

Therefore:

- Ethics and Compliance Department (DEC) organize a regular campaign to identify conflicts of interest in accordance with the principles set out in the procedure.
- All employee, meeting selection criteria, shall report such a situation, even if only potential, to our superior and refrain from acting until the problem is settled, by signing the sworn statement (see Appendix – Sworn statement) and returning it to Ethics & Compliance department.
- A decision should be made as to whether a person needs to be taken off a particular project or negotiation or whether – on the contrary – they may be allowed to continue with their work, subject to taking certain precautions or making certain changes, including the employee's interest being given up.

Pierre Fabre employees are reminded that if they have the slightest doubt, in order to ensure that they act discerningly and behave appropriately, they can consult their line managers and/or people who have expertise in compliance (Human Resources Department, Legal Department, Group's Ethics & Compliance Department, Local Compliance Officer, Ethics and Compliance referent), or even use the above-mentioned Alert system.



POLICY ON GIFTS, INVITATIONS, DONATIONS, SUBVENTIONS AND SPONSORING

Gifts and Invitations are ordinary acts of business life. Most of them are offered or accepted as a courtesy or for commercial purposes (maintaining business relations or seeking to develop a clientele) and as such do not constitute acts of Corruption.

In certain circumstances, Gifts and Invitations may be offered or received by the organization itself or by one of its employees and may take various forms, such as Invitations to restaurants, professional congresses, sporting, or cultural events, etc.

3.1. Definitions

GIFTS

Present, object given to someone in order to please them.

INVITATIONS

Act of inviting someone to a meal, a reception, a sporting or cultural event.

Gifts and Invitations are qualified as lavish when they exceed the maximum amount authorized per category as defined by the Pierre Fabre Group.

GRANTS & DONATIONS

Non-promotional and philanthropic corporate activities that support Pierre Fabre's role and reputation as a key player in the health environments and communities in which it operates.

SPONSORING

Activity that materializes the support of the Pierre Fabre company to an event organized by a third party in exchange for a service or benefit granted at its fair market value.



3.2. Simple question that employees should ask themselves

In certain circumstances, the offer or acceptance of a Gift or Invitation may constitute an act of Corruption. For example, **when it is intended to influence the performance or non-performance of an act by a third-party**, in breach of his or her legal, contractual or professional obligations, or **when the solicitation or acceptance of such a Gift by a third-party is intended as consideration for his or her action or abstention**.

Consequently, it constitutes a risk that must be identified and, where appropriate, managed and this by asking oneself a few simple questions before offering or accepting a Gift or Invitation.

- Is the situation that you currently find yourself in legal?
- Is it compliant with the provisions of Pierre Fabre's Code of Ethics?
- Is it consistent with the Group's values?
- Does it expose the Group to unacceptable or disproportionate levels of risk?
- Is it in line with the commitments that the Group has made and the guarantees it has given our stakeholders regarding its undertaking to tackle all forms of Corruption?
- How would this situation be looked upon by third parties... by your line manager, colleagues, competitors, the authorities, etc.?
- What would the consequences be for the Group if people outside the company – such as the press, competitors, or the authorities – found out about this situation?

GOOD PRACTICES

Gifts or invitations that are justified by a professional reason related to the third party's activity or that fall within the framework of a policy of the organization (public relations) and that allow the reasons for which they are offered or accepted to be objectified constitute low-risk situations.

Conversely, gifts or invitations offered to a close relative of the third party in charge of the business relationship or offered prior to a decision on the award or renewal of a contract represent situations with a high risk of Corruption.

Pierre Fabre employees are reminded that if they have the slightest doubt, in order to ensure that they act discerningly and behave appropriately, they can consult their line managers and/or people who have expertise in compliance (Human Resources Department, Legal Department, Group's Ethics & Compliance Department, Local Compliance Officer, Ethics and Compliance referent), or even use the above-mentioned Alert system.



3.3. Policy on Gifts and Invitations

Associated to this Code of Conduct, the Group's Policy on Gifts and Invitations is available on the Group's Ethics and Compliance Portal.

Governing rules are defined there:

- Third parties authorized to receive or offer Gifts or Invitations from/to Group employees,
- The maximum allowed values for Gifts or Invitations,
- The authorized annual frequencies for Gifts or Invitations,
- Approbation process and rules, if any.

Global gifts and entertainment policy

	To Third Parties (including non-Fabre stakeholders)		To Fabre Employees	
	Gifts	Invitations	Gifts	Invitations
Advertising, marketing gifts, promotional gifts or "improvised" media items and events	<ul style="list-style-type: none"> Business-to-B2B: reasonable value • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Business-to-B2B: reasonable value (Promotional & Transfer include) • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Low value giveaway • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Each gift reasonable value • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates)
Employment gifts in the context of a job promotion, awards, family anniversary	<ul style="list-style-type: none"> Business-to-B2B: reasonable value (Promotional & Transfer include) • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Business-to-B2B: reasonable value (Promotional & Transfer include) • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 		
Marketing gifts	<ul style="list-style-type: none"> Business-to-B2B: reasonable value • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Business-to-B2B: reasonable value (Promotional & Transfer include) • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 		
Local gifts	<ul style="list-style-type: none"> Business-to-B2B: reasonable value • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 	<ul style="list-style-type: none"> Business-to-B2B: reasonable value (Promotional & Transfer include) • Below 100 euros or local currency equivalent • max 10 Fabre employees (with 40% including potential 10 gift value marks on dates) 		

Legend

- Green: 100% approved
- Yellow: 100% approved at Group & in all countries where the product is sold
- Orange: 100% approved at local & regional level (with local compliance review) (a CC Local or local Ethics Portal (L-EP))
- Red: 100% approved at Global, Regional, and Compliance Department
- Dark Red: 100% approved at local & regional level (with local compliance review) (a CC Local or local Ethics Portal (L-EP))

Giving and accepting Gifts is prohibited. However, provided that several conditions are met, symbolic Gifts may be allowed. The gesture must be modest, reasonable and exceptional, 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 favorable decision towards the giver.

- ❖ Group's Code of Conduct and Group's Policy on Gifts and Invitations apply to **all Gifts and Invitations received**, regardless of the activity or third party involved.

Gifts and Invitations received	
GENERAL FRAMEWORK Third Party	HEALTHCARE FRAMEWORK Healthcare Stakeholders
No national specific regulation	<p>Code of Conduct & Policy " Prevent ethical risks related to Gifts and Invitations "</p> <p>And/or</p> <p>Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations</p>
Existing national specific regulations	

Available on [Ethics and Compliance Portal](#)

GOOD PRACTICES

When a gift received does not meet the Group's requirements, it must be returned. In certain cases, and with the approval of the Ethics and Compliance Department, it may also be considered to donate it to charity (computer equipment, etc.) or to share it among the employees of a department (box of chocolates, etc.).

- ❖ **Processes of Gifts & Invitations’ approval and management** have been defined and detailed in Group procedures as follows:

Gifts and Invitations offered			
GENERAL FRAMEWORK Third Party		HEALTHCARE FRAMEWORK Healthcare Stakeholders	
		For Healthcare Pharmaceutical Activities <i>Involving a Healthcare Stakeholder and directly or indirectly related to a drug or medical device.</i>	For Healthcare Non-Pharmaceutical Activities <i>Involving a Healthcare Stakeholder and directly or indirectly related to a dermo-cosmetic product or a product of a status other than drug or medical device</i>
Existing national specific regulations	Code of Conduct & Procedure "Prevent ethical risks related to Gifts and Invitations"	Policy "Hospitality & provided items policy for Healthcare Stakeholders in the context of pharmaceuticals activities "	Policy "Hospitality, Gifts & provided items policy for Healthcare Stakeholders OUT OF the context of pharmaceuticals activities "
	Code of Conduct & Procedure "Prevent ethical risks related to Gifts and Invitations" And/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations	Policy "Hospitality & provided items policy for Healthcare Stakeholders in the context of pharmaceuticals activities " And/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations	Policy "Hospitality, Gifts & provided items policy for Healthcare Stakeholders OUT OF the context of pharmaceuticals activities " And/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations
No national specific regulation	Code of Conduct & Procedure "Prevent ethical risks related to Gifts and Invitations"	Policy "Hospitality & provided items policy for Healthcare Stakeholders in the context of pharmaceuticals activities "	Policy "Hospitality, Gifts & provided items policy for Healthcare Stakeholders OUT OF the context of pharmaceuticals activities "
	Code of Conduct & Procedure "Prevent ethical risks related to Gifts and Invitations"	Policy "Hospitality & provided items policy for Healthcare Stakeholders in the context of pharmaceuticals activities "	Policy "Hospitality, Gifts & provided items policy for Healthcare Stakeholders OUT OF the context of pharmaceuticals activities "

General Framework’s documentation available on [Ethics and Compliance Portal](#)
 Documentation on Healthcare framework for relations with Healthcare Stakeholders **out of** the scope of pharmaceutical activities available on [Ethics and Compliance Portal](#)
 Documentation on Healthcare framework for relations with Healthcare Stakeholders **in the** framework of pharmaceutical activities available on [Ethics and Compliance Portal](#)

Pierre Fabre Group expects each employee to:

- Respect the principles laid in Code of Conduct in terms of gifts and invitations,
- Make sure all gifts to third parties remain exceptional,
- Gifts and invitations received or granted within these limits must be received or granted in circumstances such that they could not be considered as creating a relationship of compromise, influence peddling or 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,
- Comply with all applicable legislation and regulations in vigour and verify the legality of offering any gifts or invitations, even of low value, and in particular to public officials,
- Consult his hierarchy in case of doubt.



3.4. Policy on Donations, Subventions and Sponsorship

All requests for the granting of Donations, Grants or Sponsorships must be submitted for prior approval. Grants, Sponsorships and Donations may only be granted if they are documented in writing, approved by an approval committee, and on the basis of a written contract signed by a duly authorized Pierre Fabre employee and by the persons authorized to represent the requestor, signed before the grant or donation is awarded.

The process of submission and approval of Donations, Grants and Sponsorships of the Pierre Fabre Group is managed by rules that have been defined and detailed in the procedures "*Preventing the ethical risk related to Donations, Subventions and Sponsorship*" and "*Ensuring the ethics and compliance of Grants and Donations in the context of interaction with Healthcare Stakeholders*".

The operational implementation of the management of the process of submission and approval of Donations, Subsidiaries and Sponsoring, for each perimeter or Group company, is the responsibility of the Ethics & Compliance Department, the Compliance Officer and/or the local Ethics & Compliance Officer.

Available on [Ethics and Compliance Portal](#)

Pierre Fabre Group expects each employee to:

- Respect the principles stipulated in the Code of Conduct in terms of donations, subventions and sponsoring,
- Always remember to ask themselves whether or not certain donations, subventions and sponsoring, no matter how small, are acceptable, and always consult their superior in case of doubts,
- Comply with all applicable legislation and regulations and verify the legality of offering any hospitality and in particular to public officials.

Donations and Sponsorships received are de facto prohibited by the Code of Conduct. Subventions received are authorized only if they are granted by public bodies and are intended for the financing of specific projects.

Donations, Grants, and Sponsorships made in the name of Pierre Fabre Group to charitable organizations or associations must comply and satisfy:

- the requirements of all applicable laws, regulations, and codes,
- as well as to all Pierre Fabre's internal policies, procedures, and ethical standards, as follows:

Donations, Subventions (Grants) and Sponsorships offered			
GENERAL FRAMEWORK		HEALTHCARE FRAMEWORK	
Third Party		Healthcare Stakeholders	
		For Healthcare Pharmaceutical Activities <i>Involving a Healthcare Stakeholder and directly or indirectly related to a drug or medical device.</i>	For Healthcare Non-Pharmaceutical Activities <i>Involving a Healthcare Stakeholder and directly or indirectly related to a dermo-cosmetic product or a product of a status other than drug or medical device</i>
Grants & Donations	Code of Conduct & Grants & Donations' policy & Procedure "Ensure ethics and compliance with regard to Donations, subventions and sponsoring"	Grants & Donations' policy & Procedure «Ensure ethics and compliance of Grants and Donations_Healthstakeholders interactions» and/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations	
		Policy "Congresses & Sponsorships policy Healthcare Stakeholders in the context of Pharmaceuticals activities " & Procedure "Ensure ethics and compliance for Interactions with Health Stakeholders in the frame of pharmaceuticals activities" and/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations	Policy "Congresses & Sponsorships policy with Healthcare Stakeholders OUT OF the context of pharmaceuticals activities " and/or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations
Sponsorships	And / Or Other, more stringent, internal procedures developed locally, in particular to ensure compliance with local regulations		

DOCUMENTS OF REFERENCE

Opentalk



Who to contact?

Ethics & Compliance Department, compliance.pf@pierre-fabre.com



What are the documents of reference?

Procedure « Manage and prevent the Conflict of Interests »

Procedure « Prevent ethical risks related to Gifts and Invitations »

Policy “Hospitality & provided items policy for Healthcare Stakeholders in the context of pharmaceuticals activities”

Policy “Hospitality, Gifts & provided items policy for Healthcare Stakeholders OUT OF the context of non-pharmaceuticals activities”

Policy “Grants & Subventions”

Procedure « Ensure ethics and compliance with regard to Donations subventions and sponsoring »

Procedure « Ensure ethics and compliance of Grants and Donations_Healthstakeholders interactions »



Where to find the documents of reference?

[Ethics and Compliance portal](#)



Pierre Fabre

May 2021

Ethics and Compliance Department



Ethics & Compliance

Reminder of Group Internal Alert System

+ 33 5 63 71 44 46

compliance.pf@pierre-fabre.com