

# CODE OF *ethics*



Pierre Fabre



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01

**ETHICS**  
*at Pierre Fabre*





## Our mission

"Taking care, living better"

Day after day, we research, innovate, and collaborate with healthcare professionals to develop innovative solutions to promote the well-being of everyone. For us, healthcare professionals are our valued and trusted partners. We believe in the combination of the best medicine and nature to drive the ethics that characterized our Founder, whilst taking a holistic approach to well-being and care, from health to beauty.

Today, we shine throughout the world from a region that is close to our heart: Occitania, particularly the Tarn region where the Pierre Fabre Group was founded and has been located ever since. We act with an original business model: Pierre Fabre Group is majority owned by the Pierre Fabre Foundation, recognized as in the public interest, and partly owned by its employees. With several medical and dermo-cosmetic franchises – including Pierre Fabre Oncology, Pierre Fabre Dermatology, Pierre Fabre Health Care, Pierre Fabre Oral Care, Eau Thermale Avène, Ducray, A-Derma, Klorane and René Furterer – today we are the world's second largest dermo-cosmetic laboratory, the leader in over-the-counter products sold in pharmacies in France and a global player in two major areas of care: oncology and dermatology.

**Every time  
we innovate to help  
each person live  
better,**

**Every time  
we repay nature  
for her treasures,**

**Every time  
we share the fruit  
of our efforts  
with those working  
and living beside us,**

**Every time  
the Pierre Fabre  
Foundations  
improves access  
to health care  
for those the most  
in need,**

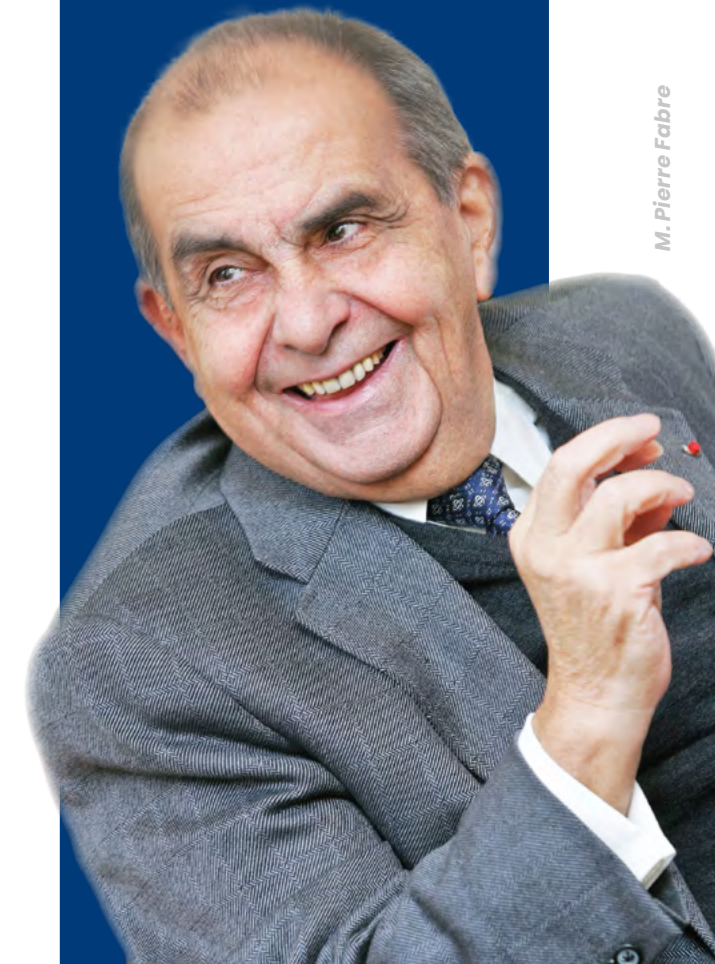
**Every time  
we care for  
a single person,**

**we make the whole  
world better.**

## Our purpose

We seek to meet the needs of patients and consumers, supporting healthcare professionals, and taking part in the economic, social and cultural development of the regions in which we are located. What drives our employees every day is working to fulfill the Pierre Fabre Group's missions in the public interest.

**In fact, this is the very foundation of our purpose:**



M. Pierre Fabre



## Message from management



Pierre Fabre Group stands out for its strong culture developed by its founder, Mr. Pierre Fabre, based on the outset on the values of rigor, 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 continuing mission established by the company's founder is respected.

The Pierre Fabre Foundation must ensure the Group upholds these values daily 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, formalizing 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.



### **Eric Ducournau**

Chief Executive Officer.



### **Roch Doliveux**

Chairman.

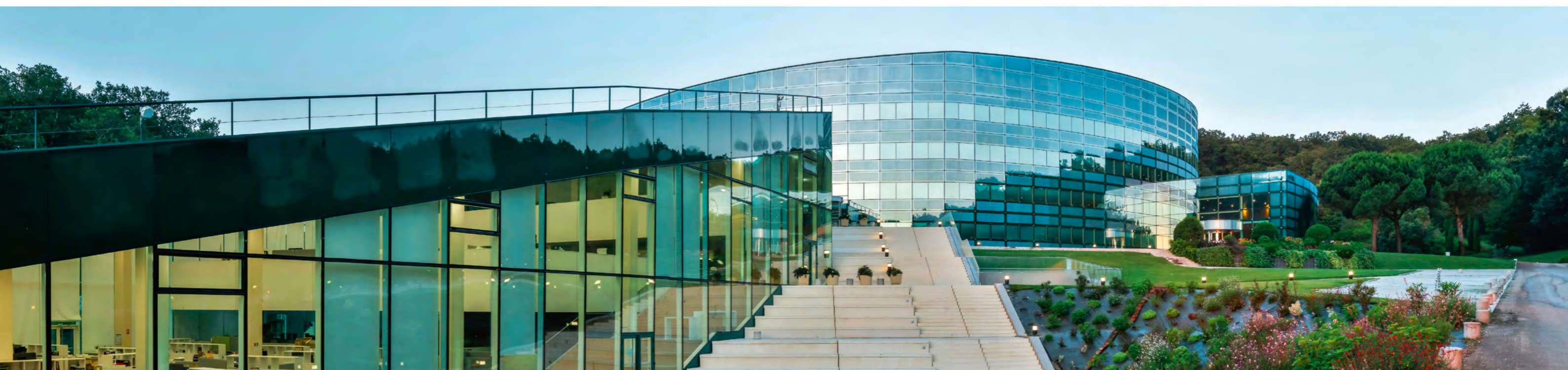
Dear colleagues,

The Pierre Fabre Group, as part of its transformation plan initiated in 2019, has chosen to distinguish itself, in its competitive world, through a modern and acute practice of transparency. This seems essential to us at a time when increased dialogue with patients and consumers has become essential in the health care professions, which characterize our medical and dermo-cosmetic activities. We have demonstrated this publicly with the first integrated report in 2020, with the implementation of the Green Impact Index as well as the transparency we showed towards our suppliers, customers, and employees during a cyber-attack suffered in early 2021.

This transparency must be based on a strict and respected ethical framework that leaves no room for doubt in the minds of our patients, consumers, and stakeholders.

In this code, seasoned employees will find a reminder of our rules, and newcomers will discover them. We hope you make them your own.

Let us never forget that these rules are even more important to us since our majority shareholder is a public interest foundation and our irrefutable reputation depends on it.





## 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 us to conduct research focused purely on anticipating new solutions in both the medical and cosmetics fields.

We want to best serve the interests of everyone, particularly patients and consumers of our products, so we develop and provide quality products and services that respect best practices and the environment. Pierre Fabre Group complies with the ethical principles applicable to the conduct of its business and behaves in a socially responsible way towards all stakeholders\* and employees. With this Code of Ethics, Pierre Fabre Group looks to formalize our commitments and unite all our employees in France and abroad through our values.

This Code of Ethics was developed to clarify the rules each employee or partner\*\* 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 behave in the expected and appropriately ethical way as a reflection of our vision and values as part of our on-going quest for sustainable development.

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

(\*\*) *suppliers, distributors, service providers, health professionals.*

### 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 missions, protect our image and reputation and allow Pierre Fabre Group to continue to grow safely.

Pierre Fabre Group also expects our partners to behave in an ethical way 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 carrying out their activities and comply with the laws and regulations that apply to their role.

Ethics is everyone's responsibility, and this Code should help all employees act with integrity and guide and support them in their daily choices. Everyone must anticipate the risks associated with their role and responsibilities.

### Role of managers

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

Each manager must also foster a culture of ethics within their teams. They must therefore ensure that each employee they supervise has been trained in the applicable procedures and regulations as well as this Code. They must promote compliance with the rules set out in the Code and encourage open communication regarding any concerns employees may have about 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.



## How to use the code of ethics?

Each employee is invited to keep a copy of the Code of Ethics for themselves as a reference document to find answers to their daily questions. However, Pierre Fabre Group recognizes that some situations are difficult to manage. Making ethical decisions sometimes seems difficult because it involves much more than simply complying with a set of rules. This Code should help everyone to ask how they should approach delicate situations that may arise in both internal and external relations.

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

- Do I respect all the rules in force (laws, internal procedures and codes)?
- Can I justify my actions and decisions?
- How will my actions be perceived by the company or by our partners?

If the answer to any of these questions is negative or if doubts remain, the golden rule is to contact the appropriate people and discuss it openly before taking action.

## Who to contact?

Pierre Fabre Group encourages dialogue and an open culture where employees can express and defend their point of view, share their concerns, report suspicious situations or be accompanied if they face challenges.

### Experts

Business experts (see the « *Open Talk* » section for each of the rules of conduct) are the first point of contact who can provide you with information and help relieve your doubts and concerns.

### Alert system

Pierre Fabre Group has an Alert System that is described below, available to all employees, which allows you to report any suspicion of violation of the provisions contained in this Code for investigation. Employees can also get 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 requires it.**







02

**INTERNAL**  
*alert system*



## Internal alert system

Any Pierre Fabre Group employee and any external and temporary employee who is aware of a situation or an act likely to violate the principles and rules of conduct set out in the Code of Ethics may freely report this suspected violation in any language to the Group Director of Ethics: Employees are requested not to act anonymously to prevent any misuse of the alert system and to protect the whistleblower.



### Group Internal Alert System\*

• By phone:  
+ 33 5 63 71 44 46

• By mail:  
compliance.pf@pierre-fabre.com

\* A local alert system may also exist; please verify with local compliance officers/referents.

**This system is also available to any Group employee who needs help and advice regarding the content of the Code of Ethics and its implementation procedures.**

The whistleblower shall directly send the Director of Ethics all the facts, information and documents they have to support their report, regardless of their form and medium, in order to allow an exchange with the Director of Ethics.

Via this mailbox, the Director of Ethics will acknowledge receipt of the information sent within a period not exceeding seventy-two (72) hours and shall inform the whistleblower that an examination of the admissibility of the report shall be conducted within a maximum period of fifteen (15) calendar days.

Following the examination of the admissibility of the alert, the Director of Ethics shall notify the whistleblower of the follow-up given to the report via the mailbox.

The reports will be treated confidentially according to the procedures in force within the Group by the Director of Ethics, who shall investigate the facts referred to by the report with the help, if necessary, of other functions such as Audit and Internal Control, which shall also be bound by a strict obligation of confidentiality.

After the implementation of precautionary measures where appropriate, the persons concerned by the report shall be notified by the Director of Ethics; they shall have the right to access and rectify information concerning them in case of error, without it being possible for them to find out the identity of the whistleblower.

Following the admissibility procedure and the verification of the report and when no follow-up has been given to the report, the information in the file that could be used to identify the author of the report and that of the persons concerned by it shall be destroyed within a maximum period of two (2) months, according to the procedures in force within the Group. The Director of Ethics shall inform the author of the report and the persons concerned by it in writing about this closure via the mailbox.

The Pierre Fabre Group commits to taking all disciplinary measures and to initiate any legal proceedings to prevent or stop any act that breaches the provisions of the Code of Ethics.

If, after investigation, the reported facts are found not to violate the provisions of the Code of Ethics, and if the Group employee who raised the alert acted in good faith and without intent to harm, no disciplinary action may be taken against them.





03

# OUR RULES

*of conduct*



We place considerable importance on respecting the laws and regulations that govern our international activities.

At all times, each employee must 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.

Thus, the stipulations of this Code do not exempt them from any of these other provisions.

As such, if local laws or codes of conduct of professional associations that govern our activities impose standards that are more restrictive than those laid out in the Code of Conduct, then those provisions must prevail.

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

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# 1. Our ethics as a health stakeholder



## Objective:

Meet all our product users' needs, from health to beauty

*We take care of people in all their sizes and diversity. To do this, we design 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 actions.*

## 1.1 Patients and consumers at the heart of our concerns

### 1.1.a Product safety and quality – User protection

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 legislation, regulations and standards applicable to the research, development, manufacturing, promotion and marketing of the products we sell.

- Thus, for all our products, our research and development activities utilise innovative scientific methods, often derived from the work of our own researchers. Our research projects are subject to robust ethical and scientific examination. Information obtained from clinical research is recorded and stored in accordance with applicable regulations.
- From manufacture to distribution, we ensure all our products, whatever their status, are safe and effective in strict compliance with quality and inspection standards applicable in the various countries of sale.

### Pierre Fabre Group expects each employee to:

**Comply** with all legislation and regulations governing the design, development, manufacture, distribution and promotion of our products, specifically clinical best practices, laboratory best practices, manufacturing and distribution practices and drug monitoring best practices.

**Ensure** the tolerance of our products is monitored and supervised during clinical trials and throughout their marketing while complying with legal obligations in terms of vigilance and general product safety.

**Communicate** any information concerning the safety of our products to the Group's relevant departments in accordance with applicable internal procedures.

**React** quickly and take all comments and complaints about product quality on board in our quest for continuous improvement and to ensure the complete satisfaction of our customers, partners, patients and consumers.



**QUESTIONS/ANSWERS,**  
complying 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?*

YES... Any Pierre Fabre Group employee, whatever their role, may receive information about the safe use of a Pierre Fabre drug, whether in their professional or personal lives. This information is must be sent to the Group Drug Monitoring Department. We are all drug monitors in some way!

*I am a production line operator and I have detected defective products that do not meet Pierre Fabre Group's quality standards. What should I do?*

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



## Opentalk

### Which department should you contact?

#### IN FRANCE :

For drug monitoring, material monitoring and nutrition monitoring :

- Immediately and at most **24 hours** after having been made aware.

✉ • By email to [HQ.pharmacovigilance@pierre-fabre.com](mailto:HQ.pharmacovigilance@pierre-fabre.com)

☎ • By phone to +33.1.49.10.96.18  
(24 hours a day, 7 days a week)

#### For Cosmetics monitoring:

- Immediately and at most **24 hours** after having been made aware.

✉ • By email to [Cosmetovigilance.france@pierre-fabre.com](mailto:Cosmetovigilance.france@pierre-fabre.com)

☎ • By phone to +33.5.62.87.01.74

#### In other subsidiaries:

Refer to the procedures provided by the local monitoring department.

### What are the reference documents?

- Drug monitoring card.

### Where can you find the reference documents?

- Pierre Fabre Intranet.



## 1.1.b A 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 other products.

- We ensure transparent, complete and up-to-date information on the safety and quality of products through their labeling according to applicable regulations.
- We respect the independence of patient organizations and build honest and transparent relationships with them.

### Pierre Fabre Group expects each employee to:

Only **provide** information to the public that is authorized 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 authorized by the relevant authorities when required by regulations.

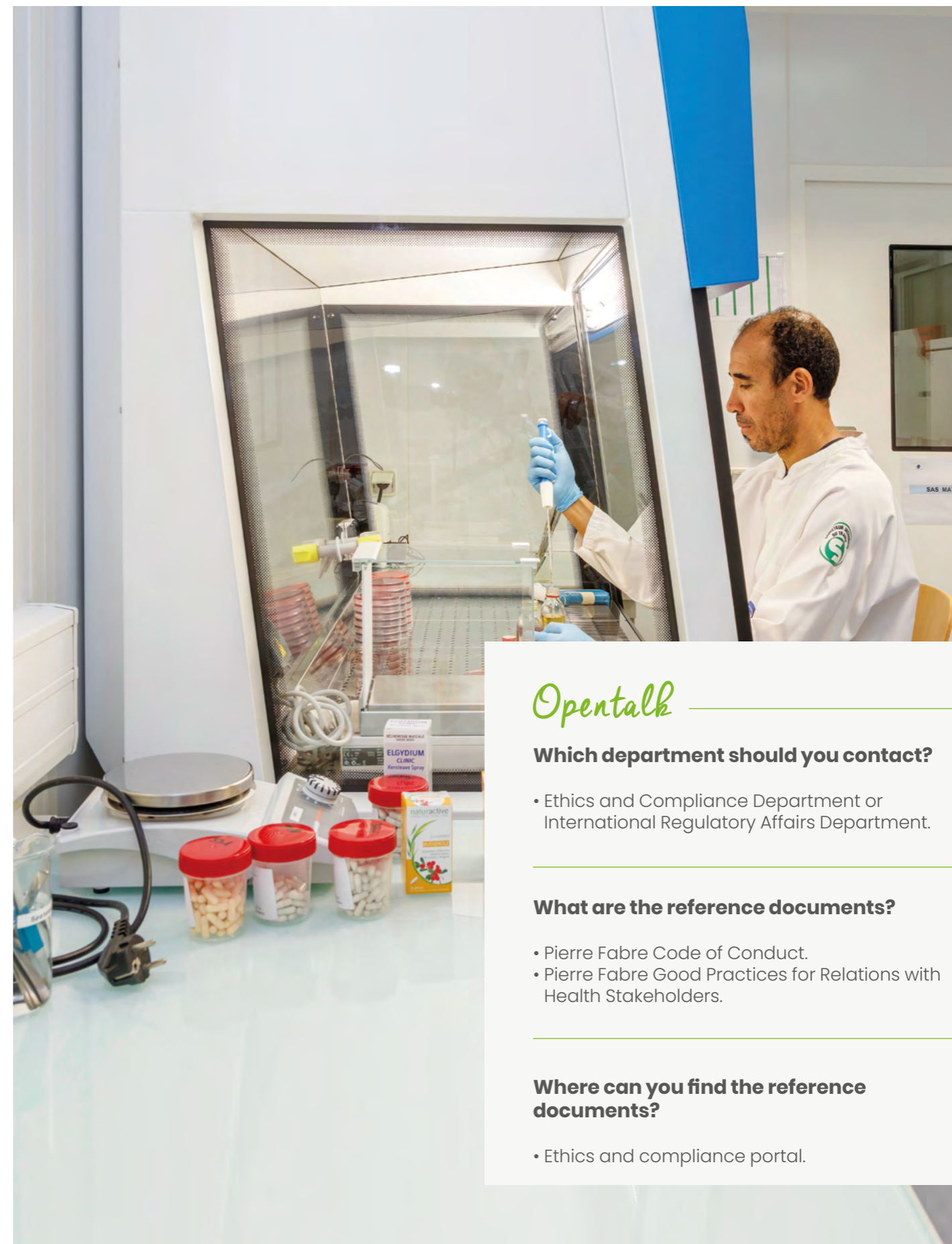
### QUESTIONS/ANSWERS, complying with the code in practice:

*I discovered some information mentioned on our product that was not updated following the latest modifications made (notice, package, etc.). Should I report it?*

Yes, report it to your supervisor who will forward it to the relevant department. It is important that the information about our products is always correct, precise, and up to date.

*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 documents made available to you have been approved according to internal procedures and / or authorized by the competent authorities when required to by regulations. You may not in any way modify or obscure the content of any documents that have been approved for use. No individual initiative in this direction is allowed. Any modifications must be approved by the competent service before use in the field.



## Opentalk

### Which department should you contact?

- Ethics and Compliance Department or International Regulatory Affairs Department.

### What are the reference documents?

- Pierre Fabre Code of Conduct.
- Pierre Fabre Good Practices for Relations with Health Stakeholders.

### Where can you find the reference documents?

- Ethics and compliance portal.





### 1.1.c Social network

Taking part in online conversations can be an opportunity for employees. We encourage and support this opportunity to open up to the world around us.

Social networks allow us to share our Pierre Fabre experience, to illustrate the diversity of our businesses and to exchange on all the topics that are at the heart of our concerns. Our contributions are therefore appreciated and judged from both a personal and professional point of view. The individual reputation of each employee influences the company's reputation and vice versa.

Here are a few keys to contributing effectively to one's own e-reputation and that of the Group:

#### Pierre Fabre Group expects each employee to:

**Publish reliable information:** beforehand, it is necessary to check the sources, make sure you own the copyright and image rights and, if necessary, contact the Communication Department.

**Be civil and polite:** social networks are not a boxing ring where disagreements are settled with shocking soundbites or insults. If a controversy arises, do not hesitate to ask the Communication Department for advice.

**Protect your privacy:** everyone can choose what access they give to published information; this is called privacy settings. Thus, a distinction is made between so-called "open" profiles, which are accessible and visible to all Internet users, and "closed" profiles, to which access is limited to family and friends.

**Be careful** and beware of opinions or beliefs expressed on social networks.

**Do not publish compromising photos:** photos and images must not in any way harm the company, and backgrounds must not reveal confidential information.

**Do not comment** on the publications of your professional counterparts: before any publication, ask the person concerned for their agreement and, in case of doubt, do not quote anyone without their agreement.

**Be loyal** to the group's strategy, its employees, and the competition. Criticism is reserved for the private sphere, and everyone remains responsible for what they publish.

**Do not publish any confidential information.** Keep in mind that all publications are just a few clicks away from a competitor, activist or journalist. More generally speaking, never take part in a public controversy on a subject related to the Group's activities or environment (distribution network, product composition, effectiveness and price of medicines, etc.).

**Respect the law:** defamation, denigration, insults, and threats are prohibited by law and are punishable under criminal law. Comments published online are no exception to this rule, and the person who publishes them is fully responsible for them.

If you wish, **share** the official content published on Group's or brands' social networks.



**QUESTIONS/ANSWERS,**  
complying with  
the code in practice:

*My mother recently took a Pierre Fabre medication that seems to be working, and I would like to share this good news with my friends via social networks. Can I do that?*

Activities to promote the pharmaceutical industries are supervised by local health agencies. As an employee of a pharmaceutical industry, and as a precautionary measure, you MUST not directly or indirectly promote a drug or a medical device. In particular, for drugs, you must not quote the name of a drug or its active ingredients, publish a photo where a drug appears, provide information relating to a drugs in development and prior to obtaining Marketing Authorisation (you MUST not comment on any results of clinical studies, or share any related press articles.).

*Pierre Fabre Group communicates via various external media (social networks, national and international press, etc.) about obtaining marketing authorization (MA) for its new oncology drug. Can I share this information on my own accounts and social networks?*

Yes, BUT ONLY if local legislation allows it. If your local Code and policies allow Pierre Fabre Group external communications can be relayed on your own social networks provided no content is modified and no benefits are exaggerated.

*November is the month without tobacco. Can I relay information about a Pierre Fabre medication authorized for smoking cessation on social networks?*

If local legislation allows it and if the Pierre Fabre Group has already communicated the information externally, you can relay it on your own social networks without modifying its content or exaggerating any benefits.

## Opentalk

### Which department should you contact?

- Communication department.

### What are the reference documents?

- Social network guidelines.

### Where can you find the reference documents?

- Pierre Fabre Intranet.





## 1.2 Ethics in our relations with healthcare professionals

### 1.2.a Transparency and ethics in our relations



#### Objective:

Develop a sustainable, trustworthy relationship with and ethical behavior towards all stakeholders

*Our company's ambition is to support the demand for care using a holistic approach that ranges from health to beauty. 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.*

We interact with healthcare professionals with honesty, ethics and integrity, respecting the law and their independence in carrying out their profession.

We seek the expertise and experience of healthcare professionals when the need is legitimate and ensure that compensation is fair and commensurate with its fair value.

Pierre Fabre Group commits to comply with national and international regulations concerning publication of its shared interests 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** anything of monetary value to a healthcare professional or association of healthcare 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 and internal procedures likely to apply.

#### QUESTIONS/ANSWERS, complying with the code in practice:

*In the interest of maintaining good relations with our experts, can I offer them lunch in a Michelin-starred restaurant to thank them for participating in a conference?*

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.

#### Opentalk

##### Which department should you contact?

- Ethics & Compliance Department.

##### What are the reference documents?

- Pierre Fabre's Code of Conduct.
- Code of Best Practices for Relationships in the Healthcare sector Pierre Fabre.

##### Where can you find the reference documents?

- Ethics and Compliance Portal.



## 1.2.b Good promotional practices

Pierre Fabre Group reaffirms its commitment to respect the most demanding standards in promoting our products, whatever their status.

We always undertake to promote our drugs in accordance with their marketing authorization. We prohibit any promotion of our products outside their approved indications or uses.

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.

To promote 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 networks apply the appropriate national regulations.



### Pierre Fabre Group expects each employee to:

**Only disseminate** clear, rigorous, clinically honest and scientifically substantiated promotional material drawn up in accordance with local regulations and validated according to the internal procedures in force.

**Comply with current promotional** best practices, particularly regarding promotional items given to health professionals.

**Comply with current regulations** on providing medical samples or samples of other products.

**Refrain** from stereotyping and always respect the dignity of everyone.

### QUESTIONS/ANSWERS, complying with the code in practice:

*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?*

NO...The messages developed in this document have been validated and selected in line with the product's characteristics and are capable of substantiation.. You must never modify these documents or remove certain information contained in them, since it is all important, nor may 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 manager and suggest the changes you feel need to be made based on your experience. They can then put these forward to the relevant persons to make any necessary changes.

### Opentalk

#### Which department should you contact?

- Ethics & Compliance department.

#### What are the reference documents?

- Pierre Fabre's Code of Conduct.
- Pierre Fabre Good Practices for Relations with Health Stakeholders.

#### Where can you find the reference documents?

- Ethics and Compliance Portal.



## 1.2.c Hospitality

When we offer hospitality in the context of scientific or commercial events, whether organized or sponsored, or during consulting services with healthcare professionals, it must always respect a punctual and professional character and only aim at supporting professional discussions during these events.

Any hospitality must be modest, reasonable and secondary to the main purpose of the meeting.

### Pierre Fabre Group expects each employee to:

**Respect** the principles laid out in the Code of Conduct and the policy on hospitality and promotional items in the context of pharmaceutical activities.

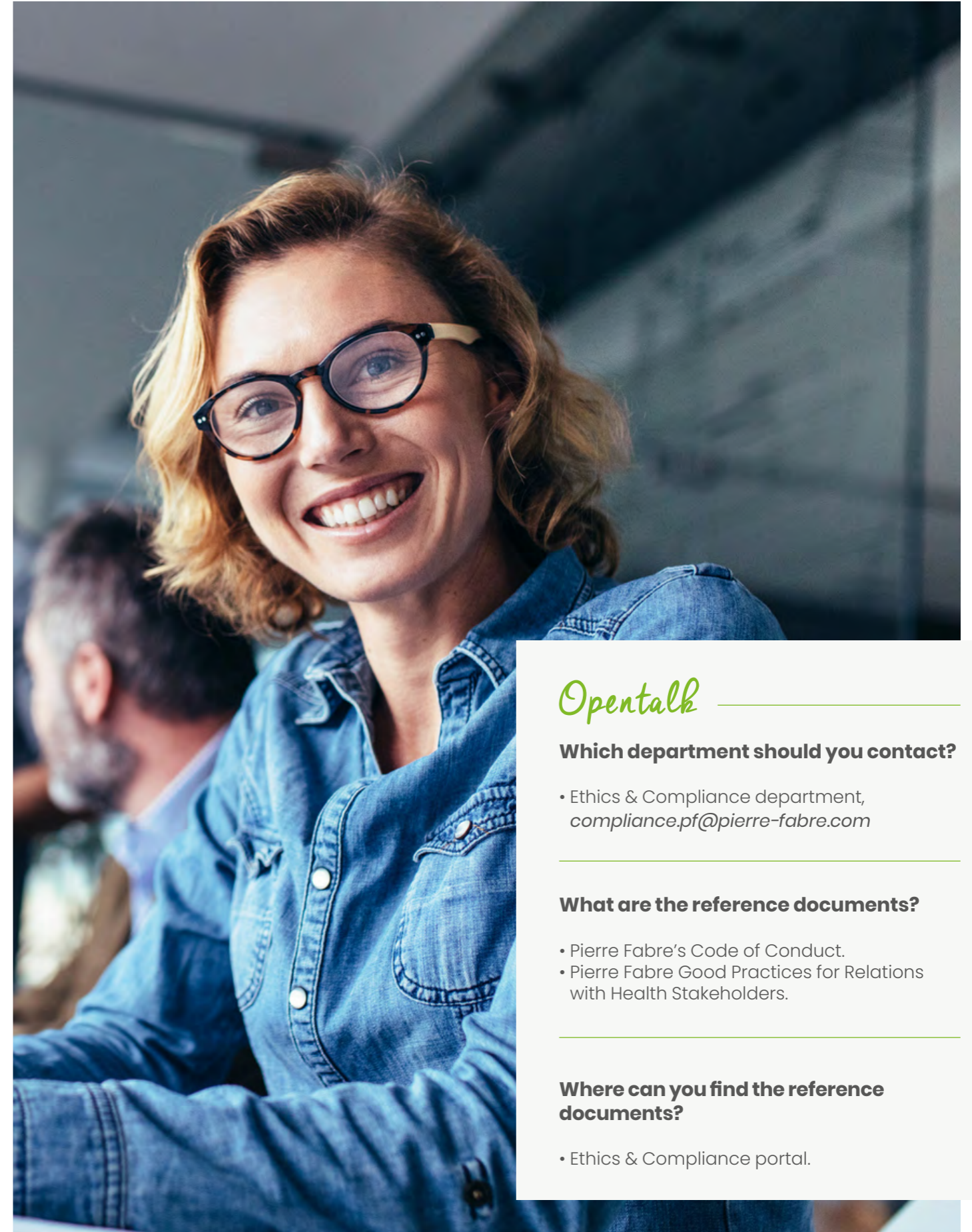
**Always remember to ask themselves** whether certain invitations, no matter how small, are acceptable, and always consult their superior in case of doubts.

**Comply** with all applicable national legislation and regulations.

### QUESTIONS/ANSWERS, complying with the code in practice:

*I am a pharmaceutical representative. A doctor asks me to subsidize 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-in-kind that could benefit the healthcare professional personally. Providing such an item with a non-negligible value could be seen as a gift that could interfere with the healthcare professional's independence. This practice is therefore NOT permitted.



## Opentalk

### Which department should you contact?

- Ethics & Compliance department,  
[compliance.pf@pierre-fabre.com](mailto:compliance.pf@pierre-fabre.com)

### What are the reference documents?

- Pierre Fabre's Code of Conduct.
- Pierre Fabre Good Practices for Relations with Health Stakeholders.

### Where can you find the reference documents?

- Ethics & Compliance portal.



## 2. Our ethics as an economic player



### Objective:

Act ethically  
with all  
stakeholders

*We act ethically, fairly  
and professionally in our relationships  
with all actors present on the market.*

### 2.1 Respect for our partners

In addition to our interactions with healthcare professionals, and more generally with all stakeholders, Pierre Fabre Group endeavors to respect all its partners. We strive to always act ethically and professionally in our business relations by establishing a coherent and constructive dialogue.

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

#### With particular regards to our suppliers:

- 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 ask them to commit to respecting the ethical standards contained in our Code of Ethics as well as all laws, regulations, and codes that apply to our activities and to accept being audited to ensure respect of these principles is assessed and continuously improved.
- We protect our partners' confidential information as if it were our own.

#### Pierre Fabre Group expects each employee to:

**Respect** the Pierre Fabre Purchasing Code which lays out 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 favoritism or discrimination and always applying the best value for money principle.

**Respect** the contractual commitments concluded 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.





**QUESTIONS/ANSWERS,**  
complying with  
the code in practice:

*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 endeavors 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 Group's Legal Department is available to draft and validate such agreements for you.

## Opentalk

### Which department should you contact?

- Purchasing department.
- Legal Department.

### What are the reference documents?

- Pierre Fabre Purchasing code.
- Pierre Fabre general terms and conditions.
- Pierre Fabre 3P Code.

### Where can you find the reference documents?

- Pierre Fabre institutional website.



## 2.2 Relations with the public authorities and associations

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.

In addition to complying with several regulatory and legal requirements, both general and specific to the health products industry, Pierre Fabre Group is a member of French (LEEM, FEBEA, SNITEM, SYNADIET, UDA) and European (Cosmetics Europe, EFPIA) professional health and beauty organizations and adheres to all codes and guidelines issued by these organizations.

### 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.

**Share** their experience with any working groups in which the Pierre Fabre Group is involved with for any associations of which they are a member.

### QUESTIONS/ANSWERS, complying 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 document must be deliberately eluded or destroyed. We must always act with the utmost transparency with the public authorities.

*I want to take an active part in the electoral campaign 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.

*During my daily assignments, I was faced with ethical issues in terms of promotion. Am I allowed to share this experience with peers working for other laboratories?*

As a member of pharmaceutical and cosmetic industry associations, we participate in the working groups organized by these associations to enhance continuous improvement of our practices through experience sharing. As a representative of Pierre Fabre in these working groups, your contribution will be as valuable as that of your counterparts. If you do not participate directly in these working groups, do not hesitate to share this experience with your manager who will be able to relay your feedback.

## Opentalk

### Which department should you contact?

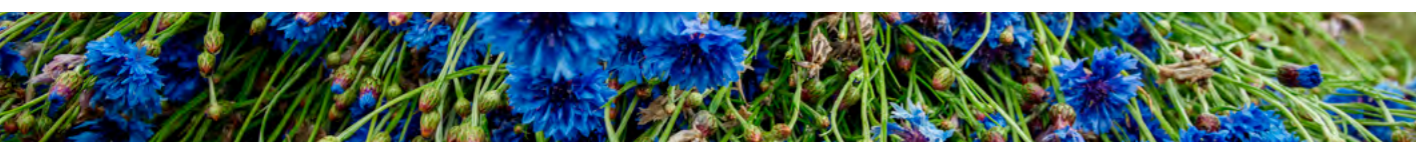
- Group legal department.

### What are the reference documents?

- Code of Best Practices for Relationships in the Healthcare sector Pierre Fabre.

### Where can you find the reference documents?

- Pierre Fabre institutional website.
- Ethics & Compliance portal.





## 2.3 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 (research and development, manufacturers and sellers, suppliers, healthcare professionals, patient groups).

- It is therefore forbidden to give or receive any unfair advantage, bribe or monetary payment.
- Cash payments are forbidden.
- It is important to always bear in mind that behavior aimed at illegally or illicitly influencing 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 actions may also result in heavy penalties.

### Pierre Fabre Group expects each employee to:

**Comply** with all applicable legislation and regulations on corruption.

**Never give or accept** bribes.

**Record** all transactions carried out with a third party in due form in the accounting records.

### QUESTIONS/ANSWERS, complying with the code in practice:

*A local government inspector inspects the company's facilities (abroad). The inspector tells you that he or she will only issue a certificate of compliance with local regulations if you pay a cash amount. What should I do?*

In principle, cash payments are forbidden. In practice, using other forms of payment may be limited in certain regions. In this case, remember that any official amount that is to be paid must be justified by an invoice or receipt from the civil servant. In other words, you must ensure that you receive tangible proof of the payment and the reason for it.



## Opentalk

### Which department should you contact?

- Ethics and compliance department, [compliance.pf@pierre-fabre.com](mailto:compliance.pf@pierre-fabre.com)

### What are the reference documents?

- Code of Conduct.

### Where can you find the reference documents?

- Ethics & Compliance portal.



## 2.4 Gifts and invitations

Giving and accepting gifts is prohibited. However, provided a few conditions are met, symbolic gifts may be tolerated.

### The gesture must:

- be modest, reasonable and exceptional,
- comply with both local regulations and the standards imposed by the main countries in which we do business,
- be made transparently,
- and not influence the receiver to make a favorable decision towards the giver or be considered as creating a relationship of compromise, influence peddling, or corruption.

Any person working in the name of or on behalf of Pierre Fabre Group must scrupulously abide by these rules whatever their role or place of work.

As a reminder, interactions with healthcare professionals and their associations, patients and patient associations are governed by self-regulatory schemes or specific national regulations on gifts and invitations. If, in a given country, no self-regulation system or specific national regulations exist, and only for pharmaceutical activities, interactions with such third parties will be governed by the codes of best practices adopted by the Group. With respect to interactions with such third parties and for non-pharmaceutical activities, the Group's Code of Conduct applies.

### Pierre Fabre Group expects each employee to:

**Respect** the principles laid out in the Code of Conduct in terms of gifts and invitations.

**Make sure** all gifts to third parties remain exceptional.

**Never give or accept** gifts to obtain or agree on preferential treatment or retain certain contracts.

**Always remember** to ask themselves whether 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 force and verify the legality of offering any gifts or invitations, even of low value, and in particular to public officials.

### QUESTIONS/ANSWERS, complying with the code in practice:

*At the signing of a contract, one of our partners wanted to offer me a gift of considerable value. I don't want to risk compromising the good relationship we have established. What should I 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 manager who will decide on how you should act. They may decide it is acceptable to share the gift with all the employees or to give it to a charity.

*One of the group's major suppliers is holding a reception for the opening of its new factory. Businesspeople, 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 manager about this invitation and obtained their prior agreement to attend.

## Opentalk

### Which department should you contact?

- Ethics and compliance department, [compliance.pf@pierre-fabre.com](mailto:compliance.pf@pierre-fabre.com)

### What are the reference documents?

- Code of conduct.
- "Prevent ethical risks related to gifts and invitations" policy.

### Where can you find the reference documents?

- Ethics & Compliance portal.





## 2.5 Grants, Donations and Sponsorship

All requests for donations, grants, or sponsorships must be submitted for prior approval. Grants, sponsorships, and donations may only be approved if they are documented in writing, approved by an approval committee, and based on 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.

Donations and sponsorships received are de facto prohibited by the Code of Conduct. Subsidies received are allowed only if they are granted by public bodies and are intended to fund specific projects.

Donations, grants, and sponsorships made in the name of Pierre Fabre Group to charitable organizations or associations must comply with the laws and regulations in force.

If, in a given country, national regulations or professional self-regulations prove to be stricter than the provisions of the policy on donations, subsidies and sponsorship specified in the Code of Conduct, the latter will not prevail.

### Pierre Fabre Group expects each employee to:

**Respect** the principles stipulated in the Code of Conduct in terms of donations, subsidies and sponsorships.

**Ensure** that key rules on soliciting and allowing donations, subsidies and sponsorships offered are respected.

**Always remember** to ask themselves whether certain donations, subsidies and sponsorships, no matter how small, are acceptable, and always consult their manager in case of any doubts.

### QUESTIONS/ANSWERS, complying with the code in practice:

*Following the occurrence of a natural disaster or an epidemic, I wish to make individual donations in favor of healthcare professionals who are on the front line, whereas pharmaceutical*

*regulations prohibit me from doing so. Given the particular context encountered and that this action would be in line with the Pierre Fabre Group's historical support for healthcare professionals, what can I do?*

The context you describe requires that you contact the Group's Ethics & Compliance Department to guide you to finding an acceptable regulatory solution.



## Opentalk

### Which department should you contact?

- Ethics and compliance department, [compliance.pf@pierre-fabre.com](mailto:compliance.pf@pierre-fabre.com)

### What are the reference documents?

- Code of Conduct
- "Preventing ethical risks with regard to donations, subsidies, and sponsorships" policy.
- "Ethics and compliance in subsidies and donations, Healthcare professionals" procedure.

### Where can you find the reference documents?

- Ethics & Compliance portal.



## 2.6 Conflicts of interest

A conflict of interest, 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, 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 authorized by the employment contract with the company, this activity must always be reported to their manager 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 allow them to continue their activity, provided they respect certain precautions or adjustments.

- 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.
- All employees meeting the selection criteria have a duty to formally report any personal situation that causes a real or potential conflict of interest, by signing the sworn statement.



### Pierre Fabre Group expects each employee to:

**Avoid** any situation that could place them or a third party in a conflict of interest.

**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 their professional objectivity.

### QUESTIONS/ANSWERS, complying with the code in practice:

*My brother has just started a 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 management?*

Whether or not this may be considered a good offer, it is important to always point out any conflict of interest, 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, favorable 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.

## Opentalk

### Which department should you contact?

- Ethics and compliance department, [compliance.pf@pierre-fabre.com](mailto:compliance.pf@pierre-fabre.com)

### What are the reference documents?

- Code of conduct.
- Policy "Prevent and manage conflict of interests".

### Where can you find the reference documents?

- Ethics & Compliance portal.



## 2.7 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. They 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 break these laws and to respect our competitors as we would like them to respect us. We are convinced of our ability to stand out on the market through the quality of our products, so we act fairly, honestly and with integrity towards the competition.
- We never seek to obtain information on our competitors illegally.
- We avoid all informal contact that could lead to reprehensible actions that could damage our reputation.
- We remember that violating competition laws can lead to heavy penalties for both the Group and the employee who carried out the offence.

### Pierre Fabre Group expects each employee to:

**Respect** competition laws and regulations.

**Avoid** 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.

**Contact** the Legal Department concerning any doubts they may have about suspected or encountered practices or any question relating to competition law.

**Report** any known act of unfair competition that is likely to affect Pierre Fabre Group.

### QUESTIONS/ANSWERS, complying 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 our direct competitors illicitly. Indeed, such acts are often reprehensible in the eyes of the law and could damage our reputation.

## Opentalk

### Which department should you contact?

- Group Legal Department.

### What are the reference documents?

- Policy "Defending intellectual property rights and free competition".

### Where can you find the reference documents?

- Internal Control portal.
- My Legal portal.





## 2.8 Financial documents

Pierre Fabre Group commits to ensuring 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 rigor.

### 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 of which they are aware is duly recorded in the accounting records and books.

### QUESTIONS/ANSWERS, complying 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 it be confirmed.

### Opentalk

#### Which department should you contact?

- Group Finance department.

#### What are the reference documents?

- Internal control book.

#### Where can you find the reference documents?

- Internal Control portal.

## 2.9 Protection of sensitive/confidential information



**Objective:**  
Protect  
our assets  
to guarantee  
our company's  
long-term  
success

*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.*



Any person working for our Group can gain access to 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 medium used, each employee must be aware of the detrimental effects that a 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.



#### 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 best practices in place within the Group and electronic communication best practices.

#### QUESTIONS/ANSWERS, complying with the code in practice:

*During lunch at a restaurant, one of my colleagues discusses a yet unpublished 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.

### Opentalk

#### Which department should you contact?

- Group legal department.

#### What are the reference documents?

- Policy "Pierre Fabre Insider Trading".
- Confidentiality booklet.

#### Where can you find the reference documents?

- Internal Control portal.
- My Legal portal.



## 2.10 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.

### 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 contact the Legal and Intellectual Property Department if necessary.

**Refrain from using or installing** software that has not been approved by the IT Department or for which we do not hold a user license.

### QUESTIONS/ANSWERS, complying with the code in practice:

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

You should always contact 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 rights. 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 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.

## Opentalk

### Which department should you contact?

- Group legal department/Intellectual Property Department.

### What are the reference documents?

- Policy "Defending intellectual property rights and free competition".

### Where can you find the reference documents?

- Internal Control portal.
- My Legal portal.





## 2.11 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 authorization.

- 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 behavior 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.

### Pierre Fabre Group expects each employee to:

**Refrain from speaking** on the company's behalf without its authorization.

**Refrain from disparaging** an employee, a Group representative, the company or one of its products on social networks or any other media.

**Avoid commenting** on the official statements 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.

### QUESTIONS/ANSWERS, complying with the code in practice:

*I am proud to have participated in the creation of a Pierre Fabre product, and I would like to promote its benefits on my personal blog which has many followers.  
Can I do this?*

Where possible, you must therefore avoid indulging in such activities. As an employee of a pharmaceutical industry, and as a precautionary measure, make sure not to directly promote a drug or medical device.

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.

## Opentalk

### Which department should you contact?

- Communication department.

### What are the reference documents?

- Code of Ethics.
- Social network guidelines.
- Confidentiality booklet.

### Where can you find the reference documents?

- Pierre Fabre Intranet.





## 3. Our ethics as an employer



**Objective:**  
Recognize the importance of our employees who play a crucial role in the success of our development and commitments

*It is our 10,500 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.*

### 3.1 Respect for people

Pierre Fabre Group wants to ensure the well-being of its employees and complies with all applicable labor laws, social standards, and the major international legislation like the International Labor 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 orientation, physical appearance, state of health or disability.

Each 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 behavior 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 favor 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 behavior, 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, rigor 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.



### Pierre Fabre Group expects each employee to:

**Behave in a respectful way** 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.

### QUESTIONS/ANSWERS, complying 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.



### Opentalk

#### Which department should you contact?

- Human Resources department.

#### What are the reference documents?

- HR Golden rules.
- Internal control guide.

#### Where can you find the reference documents?

- Internal Control portal.



### 3.2 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. Unauthorized 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 authorized 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, processing, use, sharing 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.

#### 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 unauthorized 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 unauthorized disclosure of personal data.

#### QUESTIONS/ANSWERS, complying 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.

### Opentalk

#### Which department should you contact?

- Quality, Compliance and Risk department, ([dpo@pierre-fabre.com](mailto:dpo@pierre-fabre.com))
- \*A local extension may also exist, please check with local Data Protection Officers (DPOs) in charge of data protection.

#### What are the reference documents?

- (Contact local DPO for more information).

#### Where can you find the reference documents?

- (Contact local DPO for more information).





### 3.3 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 being impaired by alcohol or drugs 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.

#### 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.

**Refrain from carrying out any task** that poses a potential risk for which they have not received appropriate training.

**Refrain from entering areas** for which they do not have the appropriate authorization.

**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.



#### QUESTIONS/ANSWERS, complying 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 authorized 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 organize your meetings to leave you enough travel time.

### Opentalk

#### Which department should you contact?

- Health, Safety, Security department.

#### What are the reference documents?

- Health, Security & Environment policy.
- Policy "Draw up and update the roles and responsibilities".
- Policy "Manage and declare serious the events and work accidents".
- Policy "Preventing the road risk at work".
- Policy "Implement the requirements related to fire risk".

#### Where can you find the reference documents?

- Internal Control portal.



### 3.4 Using the company's assets

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 endeavor 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 endeavor to protect it and preserve its integrity.
- We must never damage, lose, use to our advantage or waste the company's goods and resources.



#### 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 authorization.

**Not use** any unauthorized device to work on information or documents belonging to Pierre Fabre Group without prior authorization 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, loss or theft of equipment, to their manager.

#### QUESTIONS/ANSWERS, complying with the code in practice:

*One of my friends, who has just started 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, under exceptional circumstances to help in an emergency situation, such use may be permitted, although this is not the case here.

#### Opentalk

##### Which department should you contact?

- Health, Safety, Security department.

##### What are the reference documents?

- Site internal regulations.

##### Where can you find the reference documents?

- Pierre Fabre Intranet.



## 4. Our ethics as a responsible corporate citizen



**Objective:**  
Be a socially responsible company committed to preserving the environment

*At each stage in our product's life cycle, we seek out ways to limit the environmental impact of our activities by marrying economic performance with environmental preservation. We design and develop innovative solutions by drawing on a never-ending source of inspiration from nature and plants.*

### 4.1 Limit our environmental impact

Environmental protection is a major concern for Pierre Fabre Group in all its activities and locations and we strive to always comply with all applicable environmental standards and legislation. We want to go even further in innovating sustainably and reducing our environmental footprint throughout the life cycle of our products and in our everyday conduct in all our fields of expertise. We have therefore set ambitious objectives between now and 2025 concerning the climate strategy to comply with the Paris Agreements +2°.

**To achieve this, we:**

- Encourage energy and water saving,
- Try to use renewable energies,
- 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 behavior through our codes of best practice and by educating our staff,
- Encourage integrated farming and organic farming,
- Ensure the sustainability of the natural resources we use,
- Prefer short circuits for our product's 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 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).



### 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 authorized to deal with the matter.

**Promote** the importance of abiding by environmental protection rules among suppliers and partners.

### QUESTIONS/ANSWERS, complying 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 the environmental impact that results 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.



## Opentalk

### Which department should you contact?

- Green Mission.

### What are the reference documents?

- DPEF.
- Integrated report.
- Green Mission Pierre Fabre annual report.

### Where can you find the reference documents?

- Green Mission Pierre Fabre.
- Pierre Fabre Institutional website.



## 4.2 Promote the good use of natural resources

We are convinced of both the therapeutic and cosmetic potential of plants and the need to preserve them, so our company has implemented an approach that ensures the responsible development of innovative, safe and effective plant active ingredients.

This approach includes a rating system that indicates that the active ingredient is part of the Green Mission commitment of Pierre Fabre Laboratories, assessed by Ecocert 26000 at the Excellence level.

It is based on **five issues** : **innovate, preserve, respect, guarantee** and **commit**.

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. We value crops that are organic or without phytosanitary treatment. We ensure that plant harvesting is non-destructive or associated with a reasoned management plan. We develop agroforestry and High Environmental Value certification projects. We evaluate all our suppliers on their CSR approach.

### 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.

### QUESTIONS/ANSWERS, complying with the code in practice:

*Having been informed of Pierre Fabre Group's actions on the preservation of natural resources, I have nonetheless heard rumors 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 97% of the plants the Group uses has no impact on the sustainability of the resources and 70% 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 in 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.

## Opentalk

### Which department should you contact?

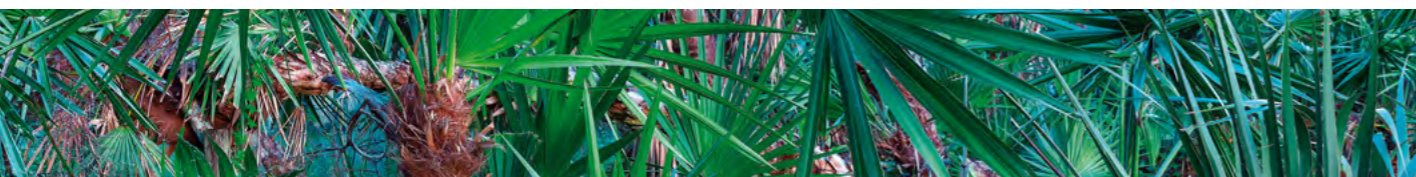
- Green Mission.

### What are the reference documents?

- Green Mission Pierre Fabre annual report.

### Where can you find the reference documents?

- Green Mission Pierre Fabre.





### 4.3 Our commitments to our partners



**Objective:**  
Strengthening  
our social  
and societal  
responsibility

*Respect for human rights  
is a collective and individual  
requirement.*

The Code of Ethics has been made public to all our external stakeholders. We respect all our commitments to our partners and expect the same rigor, loyalty and ethical commitment from them.

- Because we cannot work with partners whose principles or methods would be incompatible with ours, we encourage them to respect our principles and values with the same vigilance as we do, to contribute together to spreading good business practices and fostering ethical business relations.
- We ask our partners to be attentive to compliance with standards and procedures regarding human rights and the working conditions of their employees (prohibition of child labor and forced labor, respect for freedom of association, promotion of diversity, women's rights, respect for the right of peoples to dispose of their natural resources and the right to health).

#### Pierre Fabre Group expects each employee to:

**Remind and disseminate** our principles and values to our partners.

**Report** to hierarchy any practice of a partner that appears contrary to our principles and values.

#### QUESTIONS/ANSWERS, complying with the code in practice:

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

Whether in France or abroad, the search for an optimal quality/price ratio for Pierre Fabre Group must not be made to the detriment of compliance with the various applicable labor laws. Talk about it openly with them, clearly explain our Group's policy on this matter. If no change in its operating mode appears, it is then clear that no further business relationship can be conducted with this partner.

## Opentalk

### Which department should you contact?

- Quality, Compliance and Risk department.

### What are the reference documents?

- 3P Code.
- Integrated report.
- Green Mission Pierre Fabre annual report.

### Where can you find the reference documents?

- Ethics & Compliance portal.
- Green mission Pierre Fabre.
- Pierre Fabre Institutional website.



## 4.4 Responsible marketing

Pierre Fabre Laboratories is committed to offering quality products whose intrinsic performance is recognized by consumers, as a guarantee of trust and loyalty. However, we remain carefully attentive to changes in society, to the improvement of the life's quality, and to the respect the expectations of customers and stakeholders. We attach as much significance to the content of our communication as to the way we deliver it.

### Pierre Fabre Group expects each employee to:

**Ensure** that we give a fair, accurate and precise description of our products and their effects, that we do not offend human dignity, that we do not present degrading stereotypes about different religious, ethnic, cultural, or social groups.

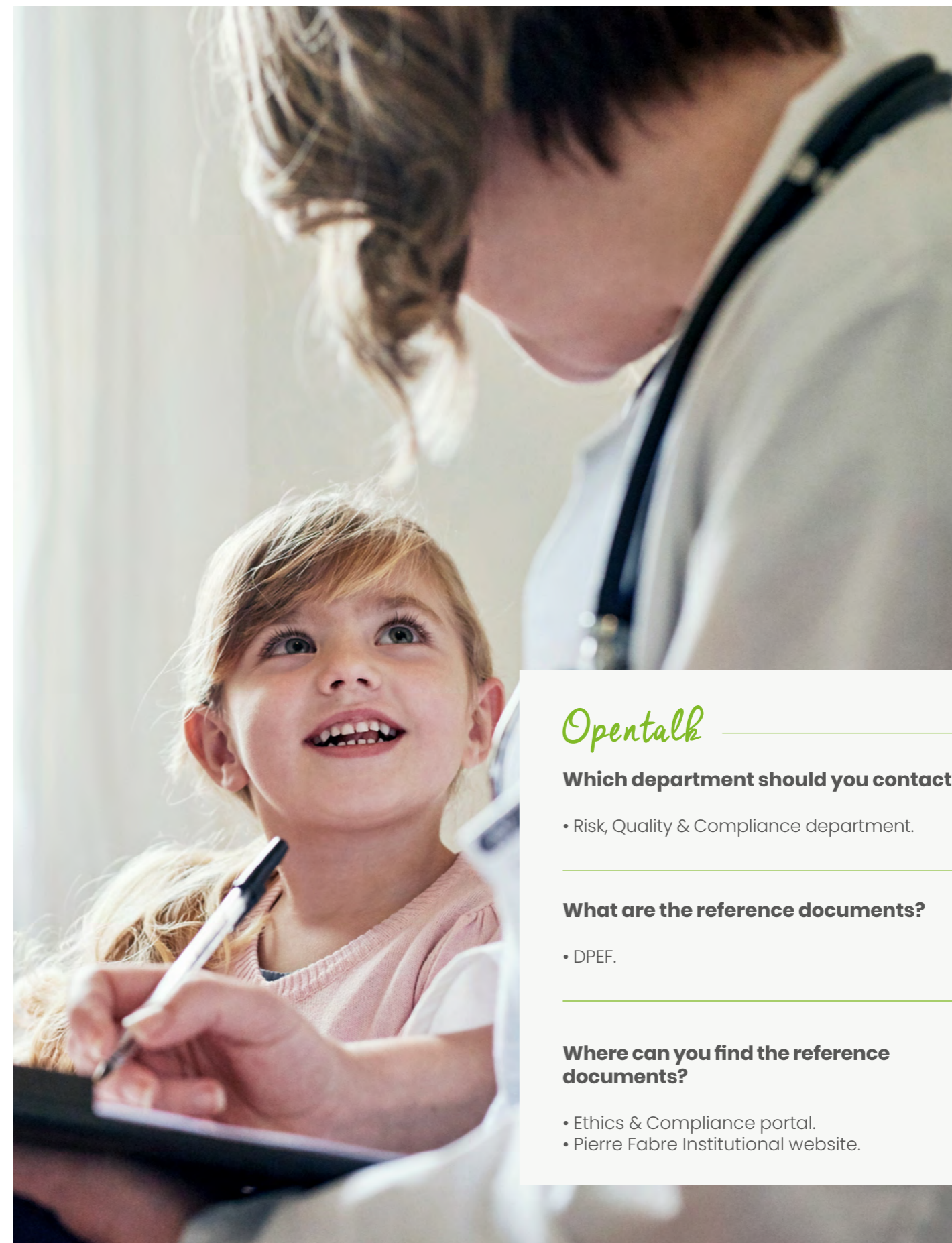
**Ensure** that our brands highlight all types of beauties.

**Promote** the authenticity of messages, transparency of communication processes, respect for stakeholders and the role of communication in promoting a certain vision of society.

### QUESTIONS/ANSWERS, complying with the code in practice:

*I am surprised by the new promotional materials received by my colleagues in the marketing department showing an extremely thin young model. I find this inappropriate and think that it could encourage young women to put their health at risk in order to achieve a comparable physique. What should I do?*

*You should share your concerns with your colleagues and encourage them to reconsider their analysis. You can also contact your supervisor or your compliance officer to express your concern. We act in accordance with the Charter and Guiding Principles for Responsible Advertising and Communication of Cosmetics Europe and make sure the message that our advertising conveys or appears to convey reflects our values and principles. Failure to consider the concerns of health authorities and society with regards to eating disorders or the image of women in our advertising could be considered a mistake and harm the reputation of the Group.*



## Opentalk

### Which department should you contact?

- Risk, Quality & Compliance department.

### What are the reference documents?

- DPEF.

### Where can you find the reference documents?

- Ethics & Compliance portal.
- Pierre Fabre Institutional website.





Pierre Fabre

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