

Code of ethics  
& good conduct

# ETHICS

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let's create our difference

Committed inspired humane



# To whom does the code of ethics and good conduct apply?

Any person working for the Ethypharm Group (including its subsidiaries and affiliates), whether directors, managers or ordinary employees, part-time or full-time, temporary or in training, in France or in one of our subsidiaries abroad, must be aware of, apply and respect the present code, and comply with all laws and regulations of the countries in which Ethypharm works or carries on activity.

Ethypharm is counting on each of us to act with full integrity. It is better to let go of business than to break the law or the rules. Your personal commitment to the following is essential for everyone.

- Learn the values, principles and legislation, and act in accordance with them.
- Take on board your own responsibilities and make others aware of theirs.
- If you have any doubts or questions, do not hesitate to approach your manager to discuss the problems and ask for advice from the Compliance Officer or the Legal Department.
- Tell your manager or the Compliance Officer if you have any concerns.
- At all times, act transparently and ethically.

Ethypharm also expects that its suppliers and distributors and other people working with it will show exemplary behaviour in this field. They are therefore asked to respect the laws and regulations applicable to their activity and in the country in which they are working. This can be achieved through a contract but the onus is on each of us to remind our partners, when we interact with them, of the principles that govern our business and which are recalled in the present code of ethics and good conduct.



## Remember!



- Acting with integrity and with respect for the present code is the responsibility of EACH and EVERY person, regardless of their position within Ethypharm.



# Respect for others

Respect, communication, wellbeing and personal development are the keys to working effectively together within a pleasant and positive environment.

## DIVERSITY, A SOURCE OF CREATIVITY AND INNOVATION

Ethypharm is proud of those who work with it, and proud of their skills, their daily involvement and their diversity.

Thanks to this diversity of talents, energies, cultures and skills, Ethypharm has built itself up over the years and continues to reinforce its innovation, image and competitiveness.

For this reason, Ethypharm undertakes and commits itself to:

- Enhance and develop the motivation and performance of those working with it.
- Favour exchanges and the birth of new ideas.
- Cultivate a spirit of initiative.
- Develop communication and transparency.

## EQUAL OPPORTUNITIES

Ethypharm has a number of systems aimed at helping each person to develop to the full, such as:

- Professional fairness between men and women.
- The inter-generational contract for jobs and skills (GIPEC).
- A balance between working life and private life.
- Employment of disabled people.

Ethypharm has a culture of giving each worker or applicant a fair chance and taking account only of skills, experiences or professional aptitudes, whether:

- During recruitment.
- When given access to training.
- With regard to payment.
- Concerning social protection.
- In terms of internal mobility. Or:
- In terms of career development.
- 

All forms of discrimination are prohibited, be they based on:

- Race
- Colour
- Ethnic origin
- [Religious] Beliefs
- Ancestry
- Gender
- Sexual orientation
- Age
- Identity
- Origin
- Disability situation
- Trade union affiliation
- Pregnancy
- Military service
- State of health
- or any other characteristic protected by current laws.

## RESPECT, BENEVOLENCE AND COURTESY

Respect, fairness and consideration for everybody form part of our daily life. Maintaining benevolent and courteous relations with our colleagues is vital both for us and for others and forms an integral part of feeling good and developing in an environment that is pleasant and conducive to good working relations. Any behaviour that undermines personal dignity, creates an environment that is intimidating, hostile or offensive, or interferes unfairly with the personal performance of an individual, and in particular harassment in any form, is prohibited.



## Remember!



- Equal opportunities, non-discrimination, respect, benevolence and courtesy are essential.

## Question & Answer



Q

One of your colleagues suggests taking on an applicant who he thinks satisfies all of your selection criteria. He has only sent you that person's curriculum vitae with no photo. When faced with the applicant, you realise that he has a particular sexual orientation. Although the interview is a success, you decide not to appoint the applicant purely because in your opinion, the other workers in your department could react negatively. Have you made the right decision?

A

No: each person has the right to an opportunity provided they fulfil the professional criteria that you have set yourself. The onus is on you to remind your team of the rules of non-discrimination and equal opportunities prevailing in the business and of the requirement to respect this code of ethics and good conduct.



# Confidentiality and protection of sensitive information

Today, in both our private life and at work, we have access to innumerable items of information. Some of these items concern our colleagues, our company and its products, strategy and assets, and those of other companies with which we interact.

While we are free to obtain information from public sources (websites, published articles, advertisements, brochures, presentations...), we must ensure that the business's unpublished assets, information and resources are protected, even if there is no formal confidentiality obligation.

## WHAT IS SENSITIVE AND CONFIDENTIAL INFORMATION?

Sensitive and confidential information is information that is of great value to the business and could, if disclosed even accidentally or unintentionally, adversely affect its future. All information that is not public is by nature secret and must therefore be protected.

Ethypharm's competitiveness is therefore based on the protection of its sensitive and confidential information of a scientific, technical or commercial nature unknown to its competitors.

The term "sensitive and confidential information" also applies to information that relates in particular to:

- Financial results
- Acquisition or disinvestment projects
- Results of studies (clinical or others)
- Issues of authorisations for a new product (marketing authorisations, prices or others)
- Loss or gain of a contract
- Analyses concerning industrial property
- Ongoing proceedings and litigation
- Agreements signed with third parties

Maintaining secrecy prevents fraudulent use, damages, misappropriation, abuse of trust, malicious actions or unfair competition, and actions such as counterfeiting and industrial espionage.

Any situation in which you are planning to distribute information internally and especially outside the business, even if you are acting in the context of business relations already established with a third party, must be carefully examined.

Ask yourself the question: how is the information defined, what use would circulating it be, in what context is it being circulated, and to what extent is the circulation of the information protected (confidentiality agreement, contract, prohibition without prior authorisation...). If there is any doubt, contact the company's legal department. Authorised communication must be strictly limited to persons required to know the confidential information.

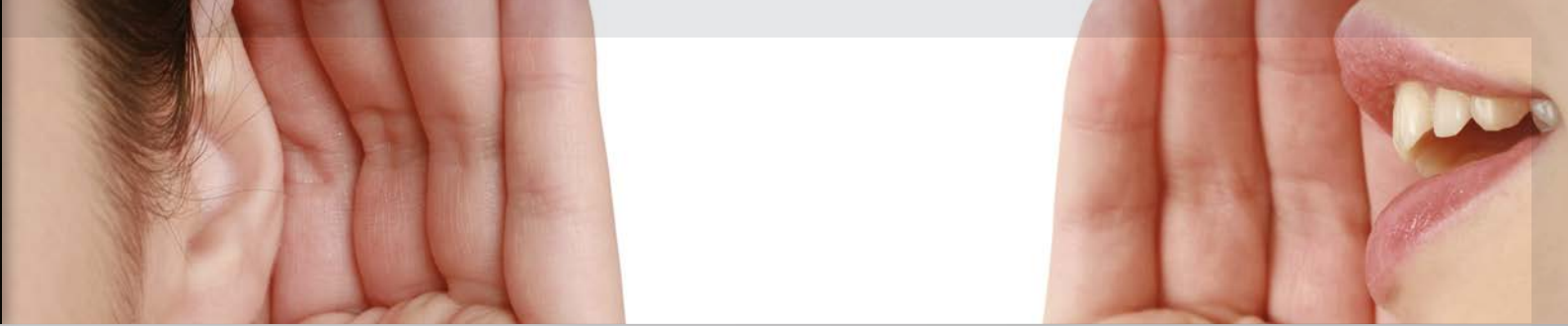
Information obtained from other businesses may only be used ethically and in accordance with confidentiality laws and obligations.

Do not look for, or ask a third party to use, illicit or unethical means (false declarations, theft, corruption, espionage, fraud) of obtaining information, whether for your benefit or for that of the company.

Similarly, be suspicious of any informal request from outside persons that you may receive by e-mail or telephone, and watch carefully all information shared electronically and the way in which you share that information.

When you travel, eat away from the company, and more generally do not discuss confidential information in any public place.

Remember, these confidentiality obligations remain in force even after an employee has ceased working for Ethypharm.



## Remember!



- Take care not to circulate confidential information internally or externally without a prior authorisation.
- Be vigilant during conversations, or when consulting documents, in public places.
- Take advice from the Legal Department if there is any doubt about confidentiality of information.
- Respect the charter for the use of computers, available on our Intranet.

## Question & Answer



Q

While you are in charge of logistics, you take a direct call from someone claiming to be an intermediary whose client is very interested in the latest product that you have just launched. He asks you if the product is available for France and where the raw material originates from. What answer should you give?

A

Ask for the name and number of the person contacting you and answer that you are not qualified in this subject but will send his request to the relevant department, which will call him straight back. Immediately inform the business development and legal departments of this unusual request; it may be an attempt at obtaining information unfairly.



# Conflicts of interest and political support

The professional interests of an employee, and those of any individual person or legal entity in their circle of acquaintances, may sometimes be in conflict with the company with which the employee works. This is known as a conflict of interest.

In order to prevent problems arising and the company's reputation from being undermined, each of us must always take care not to generate, or find ourselves in a situation that could lead us to lose our objectivity in taking professional decisions.

In this kind of situation, one of your relatives may have private interests linked to Ethypharm's activity. The onus is on you, once this link is identified, and in order to prevent the objectivity of the decision taken by the company to enter into relations with your relative from being disputed, to inform your manager of this link before any decision is taken, and to refrain from involvement in the decision-making process.

You are also reminded that you have undertaken to work only for the company. Should you wish to carry out any ancillary activities, this must be subject to the prior formal agreement of the company.

If you wish to invest in a competitor, client or supplier (unless acquiring shares in a listed company), you must inform the Human Resources Department straight away in order to prevent this situation from altering your objectivity when you commit the company.

Refuse politely but firmly the offer of any gift, invitation or other non-symbolic benefit (as defined in the company's "gifts" policy) that may be offered to you

and give you a sense of owing something, and thus lead you to lose objectivity in your future decisions.

Similarly, any political support activity or political demonstration must be carried on outside the context and working hours of the company. Moreover, employees are formally prohibited from committing the company by using its equipment, premises, funds, resources, name and image for personal political activity.

In addition, Ethypharm does not authorise its employees or representatives to commit it directly or indirectly to use its name and image for support purposes or within the framework of political activity. Similarly, the company's financial resources may not be used to support either directly or indirectly a political party, candidate or activity at any level in France or abroad, unless the CEO and Chairman of the management Board expressly authorises it.





## Remember!



Avoid conflicts of interest or situations likely to place you at odds, so that your objectivity in decision-making processes can be preserved.

## Question & Answer



Q

Your spouse has a graphic design company and is seeking new clients. You know that your company wishes to redesign the advertising documents for a product whose promotion you are responsible for. You therefore inform your spouse, who decides to make a bid, without disclosing her familial relationship with you. What should you do in such a case?

A

It is preferable for you to inform the decision-making person in your company of your familial link so that this business relationship cannot be contested. If the terms of your spouse's bid meet the company's criteria, it may be accepted according to the procedure in place, and completely objectively.



# Free competition and competition law

Free competition between businesses is protected by a whole series of competition laws which, if violated, could give rise to sanctions that vary, according to country, from fines to damages payments to prison sentences.

This may involve illegal arrangements to fix prices, conditions of sale or distribution of contracts, exchanges of information between competitors, discrimination or boycotting of suppliers.

A dominant position on the market requires us not to seek to exclude our competitors or exploit our clients.

The following are thus prohibited:

- Agreements and contracts with competitors relating to, among other things, prices, conditions of sale, product information, contracts, financial information, competition or agreements with third parties (clients or suppliers).
- Exchanges aimed at boycotting clients or suppliers, limiting business, or excluding competitors.

Particular caution should be taken during meetings between partners or industrial concerns, even if these are organised for legitimate or useful purposes. You may be required to discuss problems of common interest and possibly cross the yellow line of non-compliance with the obligations of competition laws.



## Remember!



Ensure that you do not conclude agreements, or make contacts with clients, which could be construed as anti-competition or discriminatory.

## Question & Answer



Q

You are involved in an international trade fair abroad, and in it you meet one of your competitors with whom you are in litigation over an issue concerning patents. The competitor proposes stopping the current proceedings and reaching an agreement aimed at delaying your product's appearance on the market. To do that, he proposes paying you a total equal to the anticipated turnover for the period during which you make no sales. Can you accept this offer?

A

This type of agreement, by which you delay the appearance of a competitor's product on the market, is strictly prohibited under anti-competition laws. You are therefore advised not to accept.



# Anti-corruption

The practice of certain companies and individual persons with the aim of offering or obtaining unfair advantages, have for several years now led to reinforcement of national and international regulations aimed at preventing or punishing bribes and corruption.

These regulations have arisen from international conventions (United Nations Convention, OECD Anti-Corruption Convention) and from national legislations (US Foreign Corrupt Practices Act (FCPA), UK Bribery Act, DMOS Law, Bertrand Law) and apply within the framework of professional, commercial and private relations. The term "corruption" covers all forms of behaviour that are unethical or unlawful. The payment of bribes or other illicit favours is a form of corruption that involves the offering, promotion, giving, acceptance or begging, either directly or indirectly, of an unfair and illegal advantage.

Ethypharm expects that its employees will not practice the following in any circumstances, either directly or through a third party acting for and on behalf of companies or individual persons:

**1. Active corruption**, which involves offering or promoting to:

- A Public agent
- A Civil servant
- Health professionals
- Politicians or political parties
- Or any other individual or legal entity

any money, gift, service or other undue advantage in order to incite these persons to carry out (or not carry out), within their duties, an act that could be facilitated because of their position.

**2. Passive corruption**, which involves for these same individuals or companies, begging or obtaining offers or promises of money, gifts, services or any other unfair advantage with the aim of carrying out or not carrying out an act within the framework of their duties or likely to be facilitated because of their position.

Do not forget that criminal or civil sentences can be passed both on individual persons and on businesses. Corruption, or allowing oneself to be corrupted, can lead to the imposition of severe fines, and, in some countries, prison sentences.

Acts of corruption committed within an Ethypharm Group subsidiary, or in a country other than France with which we have business relations, may also result in a sentence being passed in France, where our head office is located, and also in the country in which our subsidiary is located, as well as in the country in which we have acted.

In addition to fines and prison sentences, corruption can have a serious negative impact on a commercial level and seriously damage the image and reputation of our company.



## Remember!



- Do not accept or offer any unfair advantages in order to obtain any improper business advantages.
- Do not do business that compromises your integrity.
- You are the guarantor for Ethypharm's reputation.
- Inappropriate conduct could lead to severe sanctions both for the company and for you.

## Question & Answer



Q

To express thanks to an official who has diligently examined our file and obtained the authorisations necessary for marketing our product, can I encourage Ethypharm to take on the son of this official for paid training in Paris?

A

Acting in this way will lead to risks for both the company and yourself. The link between obtaining the authorisations and the presence of this official's son within the company may be known and denounced before the official's superiors. In this kind of case, Ethypharm's activity may be called into question and its reputation damaged. Ethypharm (and yourself in some cases) may be subject to sanctions locally or in France because of application of international conventions that allow acts committed abroad to be pursued in your country.



# Relations with health professionals in China

In the context of our activity, we call on health professionals (companies or individual persons) in China with the aim of obtaining their expertise and advices, which we need to improve our medical knowledge and develop new medical products, as well as for carrying out clinical or other studies.

All these relations help us to progress in our activity in the interests of patients. The services required from these professionals must be legitimate and paid for at a reasonable market price. China has recently introduced specific laws governing our relations with health professionals.

These include:

- 1.** The Chinese Anti-Bribery and Anti-Corruption Laws prohibits anyone with a connection to a healthcare professional from corruptly offering, paying, giving, promising to pay or authorizing the payment of, directly or indirectly through another, anything of high value, in order to obtain, retain or develop drugs prescriptions.
- 2.** The Provisions of Anti-Bribery and Anti-Corruption Laws in the Pharmaceutical sector” concerning transparency of relations, require that fees must be stated into a contract, be reasonable and according fair market value. Fees must be declared and related income tax pay to competent authority..

The terms “health professional” and “health organisation” cover a wide range of individual persons, companies or associations working in the field of health; a list of these is set out in the laws.

In addition, the term “relations with health organisations” covers congresses, seminars, meetings, symposiums, gatherings of experts, written or spoken communications, mission contracts or provision of service or research.

For further information on these regulations and their scope, please send an e-mail to: [compliance@ethypharm.com](mailto:compliance@ethypharm.com).



## Remember!



- Please respect the procedures introduced by Ethypharm under the DMOS law on transparency in your relations with health professionals.

## Question & Answer



Q

During a meeting aimed at presenting our products to a doctor, the doctor mentioned that he could prescribe them as a matter of priority if we invite his wife to the next congress, organised by our company, to which he is invited. How should I follow up this suggestion?

A

The doctor's wife cannot be invited as the aim of her trip is not professional; this could be construed as an unfair advantage offered to the prescribing doctor.

# image and communication



## 1. USE OF MEANS OF COMMUNICATION

Nowadays, everyone has access, either professionally or personally, to a large number of new communication tools. These tools may be internal to the company or open to everyone via the internet.

These tools include the social networks Facebook, LinkedIn, Twitter, YouTube, Flickr and forums or Wikis. For some of these networks or forums the content can be altered and made accessible to anybody, in any place and at any time.

It is therefore essential, in the interest both of Ethypharm and of individual people, to use these social media responsibly, checking carefully what we include in them, even in a private situation. The wording may not contain anything insulting or be political, religious, sexual or racist in content, and nothing may be said about your colleagues' opinions of the company or its partners or competitors.

Each of us may be held liable for what we publish on social media. In addition, what we say may be attributed to the company and have negative repercussions on the reputation and image of Ethypharm.

When using computer systems, you must respect the Ethypharm Computer Charter, which can be consulted on our Intranet.

## 2. INSTITUTIONAL COMMUNICATION

Only the company's communications department and certain duly authorised employees are authorised to report for the company on its activities.

Any unsupervised communication could be damaging to the future of the company (for example, announcing a new contract when it has not been signed, speaking of a potential acquisition especially when one of the company is listed on the stock exchange, expressing an opinion on a conflict or accident, commenting on a health authority visit...).

Please refer all requests for information or interviews to the communications department ([communication@ethypharm.com](mailto:communication@ethypharm.com)) and inform your immediate manager.





## Remember!



- Use means of communication and social media responsibly.
- Do not report on the company or its activities without prior authorisation.
- Refer all requests for communication to the appropriate department.

## Question & Answer



Q

At the company Christmas dinner, we took some photos of colleagues. Some of these are highly amusing and I want to post them on my Facebook profile. Have I the right to do that?

A

You are advised not to proceed without previously obtaining the consent of the people shown on the photos. If you have any doubts, refer to the company's Computer Charter or consult the Compliance Officer.



# Relations with outside service providers

Before entering into commercial relations with an outside service provider, it is advisable to find out about this service provider's reputation and ensure that he, she or it complies with the legal and conventional provisions and behaves ethically.

The service provider will also be asked to:

- Respect current laws and regulations in the field of health, safety and the environment in order to guarantee protection of its employees, the quality of the sites on which it pursues its activity, and therefore the quality and compliance of the services that it provides to us.
- Respect all the specific laws and regulations applicable to our industry during the manufacture of products or realisation of services that it provides to us.
- Respect the fundamental principles of the Work Organisation Convention by not, among other things, using child labour or forced labour and by ensuring equality of treatment and opportunities for every staff member.
- Informing Ethypharm of any conflict of interest likely to affect our relations before entering into a task or service with us.
- Respect current anti-corruption laws in its country applicable to its work, and confirm this undertaking by agreeing to insert ad hoc clauses into the contracts signed with our company.

The onus is on you to carry out an assessment of all new service providers prior to any undertaking and to verify periodically that the current service providers are complying with the laws, codes and procedures.

The onus is also on you to inform our service providers of, and make available to them, the full range of our company's internal charters and procedural documents with which we expect our service providers to comply.



## Remember!



- Do not enter into business relations without carrying out certain prior checks and complying with current company procedure.
- Inform your service providers of Ethypharm's commitments and the need to abide by them.

## Question & Answer



Q

You wish to purchase one of our basic products from a supplier that offers you a highly competitive price. This supplier has all the administrative authorisations required for exporting the product to our factory but you learn that not only does it not provide the working conditions required under local legislation but also employs children. Can you confirm your orders?

A

To confirm your orders in these circumstances would contravene the principles of this present code and also those of the International Convention on Labour Organisation. You must advise your service provider that until it becomes compliant with the legislation and regulations, you cannot do business with it.



# Protection of privacy and personal data

Ethypharm undertakes to respect protection of privacy and personal data in accordance with the laws of the company in which it operates.

This protection is offered not only to all its employees but to workers with whom Ethypharm deals on a daily basis. Each of us is also required to ensure the protection of personal data processed by us, with respect for the laws and for the present code.

## WHAT ARE PERSONAL DATA?

Personal data are items of information that allow an individual to be directly or indirectly identified. They may include, for example, that person's name, address, date of birth and photograph.

These data may be collected, processed, used, circulated or stored by any means.

## WHO IS INVOLVED?

Personal data collected may belong to our employees, to doctors, specialists and patients involved in clinical studies, or to other service providers.

## HOW ARE THESE DATA USED?

Personal data must be used for a precise purpose and fairly, and must not be stored beyond the period strictly necessary for the intended goal.

Transfer of data from one country to another, especially from a European state to a non-European state, is regulated. Compliance with current rules should therefore be verified before any transfer is made.

In France, the processing of personal data is subject to respect for the "Information and Liberties" law, dated 6 January 1978 and modified in 2004.

This law allows all persons whose personal data are used the right of access to and amendment of any information relating to them and disclosed.



## Remember!



- All personal information collected must be obtained for a precise purpose and be the subject of confidential processing in accordance with laws applicable in the matter.
- Every person has the right to have their data amended and deleted.

## Question & Answer



Q

Your daughter is writing a thesis in medicine on the treatment of lung cancer. It turns out that your company is developing a new anti-cancer drug, and that it has held clinical trials on the efficacy of this product, among others, on lung cancer. The raw data from these studies, which have not been published, would be very useful to your daughter. They indicate, in detail, the gender, age and address of the patients treated. Can you give her a copy of this data, asking her not to reproduce it as such in her thesis ?

A

The information concerned is personal in nature, collected for a particular purpose. It cannot therefore be circulated without the prior consent of the persons concerned. Although in this case the names of the people are not indicated, the information available may allow the identification of patients.



## Health, safety and the environment

Ethypharm works to determine, limit and control the short, medium and long term impact that its activities may have on the environment, the health and safety of its employees, and the wellbeing of all persons visiting or working on its sites and of the population living around its production sites.

For this reason, Ethypharm undertakes to:

- Ensure the safety of its employees
- Protect their health;
- Optimise safety on its sites;
- Respect the environment;
- Ask its service providers to respect these same rules.

To achieve this, Ethypharm needs each of us to be aware of the physical, chemical and biochemical risks inherent to its work and likely to lead to accidents. Each of us must manage these risks responsibly and with caution, and must react rapidly to ensure that all corrective action can be taken without delay.

Any situation likely to pose a risk to health, safety or the environment must be reported as soon as possible to the hierarchy or to the HSE Manager.

The environmental effect of our activities can be improved all the time through responsible behaviour on a daily basis. This can be achieved by avoiding unnecessary trips and by participating in energy saving programmes.

A more detailed description of the health, safety and environment rules applicable within the business and to be respected by everybody in the course of their work, can be found in the internal rules of procedure that can be consulted on the Intranet.

## Remember!



- It is in your interest and that of the company and the patients to respect all the health, safety and environment rules applicable within Ethypharm.
- Limit the effects of your activity on the environment every day.

## Question & Answer



Q

You are using an active product that is hazardous to health. Today, you arrived late and did not take time to put on your mask and gloves to transfer the product from drum to the coating pan. Your supervisor notices and reprimands you. Is he right to do so?

A

Violation of applicable safety rules may have serious consequences for your health and therefore on the company which is responsible for your safety at work. Your employer cannot therefore tolerate this type of negligence whatever the reason.



# Respect for good practice

Allowing patients to benefit from medicines means that at each stage in the life of a product, namely its development, manufacture, storage and distribution. We must respect all the internal and external standards applicable for ensuring the quality and efficacy of the product.

Apart from the laws and regulations applicable in the matter, our industry is also governed, among others, by:

- Good Laboratory Practice
- Good Clinical Practice
- Good Manufacturing Practice
- Good Promotion and Distribution Practice.

Our collective responsibility involves providing patients with medicines that are ever more effective.

It also involves promoting them and communicating on their advantages and the risks inherent in taking them, as comprehensively, objectively, reliably and accurately as possible in order to allow both prescriber and patient to appreciate the quality of the product and use it both wisely and correctly.

To achieve this, all information, documents and promotional supports must be backed up by an argument based on an indisputable, essential scientific reference, and the circulation and transmission of promotional documents and samples must comply with the rules applicable in the matter.

Respect for the principles and rules of development, manufacture and promotion of medicines and for applicable local or international codes and laws is a commitment of Ethypharm, thanks to the cooperation of all of its employees in this regard.





## Remember!



- We are all a patient at some point
- Respect good practices, procedures, laws and regulations
- Circulate only authorised documents and information duly approved in accordance with applicable company procedures.

## Question & Answer



Q

A product manager, to set a competitive advantage, wants our promotional documents to mention that the bioavailability of our product is better when it is taken without food. However, this criterion has not been validated by a clinical study. Can we put forward this argument and use a curve obtained at laboratory scale in our promotional documentation?

A

The medical information given to prescribers and patients must be both verified and accurate. This is not the case here. Competitors could argue that our promotion does not comply with good practice and accuse us of unfair competition.

# How to report one's concerns and violations of the code

Ethypharm undertakes to respect, and ensure that all of its employees respect, the national and international laws and regulations of all countries in which it is actively involved, as well as the principles that it has laid down itself with regard to compliance and ethics.

Failure to respect or to comply with the laws and regulations may have serious consequences for Ethypharm, its clients, the patients, our investors and our colleagues.

Each of us may, one day, be confronted with a situation that we consider contrary to the law, the regulations or the principles of Ethypharm.

As an employee of Ethypharm, you have the privilege and responsibility of maintaining our company's good reputation.

By raising your concerns, you are giving Ethypharm the opportunity to resolve any problems and thus protect the business.

There are different ways of sharing your doubts or concerns and or raising questions or indeed sharing your ideas. These doubts, concerns, questions and ideas will relate in particular to legal and ethical matters but may also be linked to quality and working environment.

Most problems may be resolved at local level without more generally affecting the company and other employees.

Accessibility and dialogue are essential for a compliance programme, and all managers must therefore be open to any of their colleagues wishing to discuss these matters with them.

As a general rule, the first step is to mention the subject of your concern with your immediate superior.

However, some people, even though they have good relations with their manager, may prefer to discuss the subject of their doubts or concerns by raising questions or sharing their ideas with a third party. For this reason, you may contact either:

- The higher level of management
- The manager of your operational unit.
- The Compliance Officer.
- Human Resources, at local or Group level. Or:
- The Legal Department.



In addition, if you have a doubt or suspicion over any illegal or unethical practices in finance, accounting, internal audit, competition or anti-corruption activity, you can, provided you act in good faith and without the intention of causing harm, contact the Compliance Officer as follows:

- E-mail: [compliance@ethypharm.com](mailto:compliance@ethypharm.com)
- By post or in person: Compliance Officer, 194 Bureaux de la Colline, 92213 Saint Cloud Cedex
- You can also find a section dedicated to Compliance and responses to frequently asked questions (FAQ) on the intranet.

In all cases, every effort will be made to guarantee that information relating to a reported violation remains confidential and is shared only with those persons required to know it, in case of absolute necessity.

Ethypharm will not tolerate retaliation by any employee against a person who reports any violation, and shall not take any disciplinary or discriminatory measure against that person, provided the report is made in good faith and without malicious.

After a report is made, the Compliance Officer, with the support of any other manager or competent auditor concerned, shall examine the violation suspected or observed rapidly and with complete objectivity.

The persons affected by the report shall be informed as soon as possible subject to any prior investigatory measures that may be necessary.

If the violation is found to have occurred, appropriate corrective actions shall be taken. These may include:

- Clarification on the good practices and principles of the company.
- Provision of additional training.
- Disciplinary measures.



## Remember!



- Identify and analyse, without delay, any situations and actions that seem to contravene this code of ethics and good conduct and could create difficulties for Ethypharm.
- Always act in good faith.

## Question & Answer



Q

I overhear a conversation between one of my colleagues and a third party who, clearly, does not appear to belong to our company. The discussion concerns the financial results of the company and products under development. This information has not been officially disclosed, and is therefore confidential. What should I do?

A

Report this conversation to your immediate manager or the Compliance Officer. Your colleague should be advised that his behaviour is unethical.



# Main consequences of breaching the code

The main consequences of non-compliance with and breaching the code of ethics and good conduct can be summarised as follows:

## FOR PATIENTS & OUR PARTNERS

- Efficacy and quality of products compromised
- Risk to health
- Risk to the environment
- Increased costs
- Loss of confidence in Ethypharm

## FOR ETHYPHARM

- Legal proceeding fines and other penalties
- Impact on relations with the authorities
- Loss of business and damage to asset
- Loss of image and reputation

## FOR ETHYPHARM'S EMPLOYEES

- Proceedings fines and prison sentences
- Disciplinary measures and possible termination of work contract
- Loss of personal reputation
- Injury or serious illness

## FOR OUR SHAREHOLDERS & INVESTORS

- Loss of confidence in Ethypharm and its products
- Loss of value of investments
- Loss of reputation of the company in terms of management