


Pierre Fabre

3P CODE



1. INTRODUCTION

Pierre Fabre Group stands out for its strong culture developed by its founder, Mr. Pierre Fabre, based from the outset on the values of rigor, integrity, accountability, citizenship, and respect for people and the environment, **placing ethics at the very heart of its operations**. The activities of Pierre Fabre Group (“Pierre Fabre”) stand solidly on the foundation of its commitment to the ethical standards contained in its Code of Ethics and with all laws, regulations and codes that apply to its business.

To uphold these standards, Pierre Fabre expects the same engagement from its business partners and is determined to work only with third-party companies that share these values and commitments.

2. COMPLIANCE WITH THIS 3P CODE

The **scope** of this code (“3P Code”) includes all the third-party organizations and individuals it contracts with, such as, but not limited to, suppliers, distributors, wholesalers, consultants, agents, service providers, outsourcing partners, joint ventures and promotion partners, staffing agencies, research or licensing partners (“3Ps”). The 3P’s ability to comply with this 3P Code is a selection requirement in Pierre Fabre selection processes, including Pierre Fabre procurement process.

Pierre Fabre expects its 3Ps to adopt and apply the 3P Code in **all activities related to Pierre Fabre** and to implement all necessary policies, procedures, systems, education, issue-reporting and control mechanisms to ensure the 3P Code is applied effectively and corresponds to genuine business reality (see section on Compliance Programs). 3Ps are free to determine how to meet and demonstrate compliance with the principles and standards of this 3P Code.

This 3P Code is an integral **part of the relevant agreement** between Pierre Fabre and any 3P but it is not intended to replace it or supersede it. Even after transactions have started, Pierre Fabre will determine whether or not to continue the relation with the 3P based partly on the compliance with this 3P Code. Breach of any of the provisions of this 3P Code is considered as a significant breach of the related contractual obligation and may engender consequences, up to potential termination of the contractual relationship, and in line with the applicable laws, regulations and codes.

Pierre Fabre may revise the contents of this 3P Code and will publish the revised 3P Code on the Pierre Fabre website and inform its 3Ps of the same. The obligations of 3Ps continue to exist after the **revision** of this 3P Code, and the 3Ps are therefore requested to continue to comply with the revised 3P Code.

At the time when a 3P becomes aware of any **violation** of this 3P Code, it must promptly inform Pierre Fabre. If any violation is established, the 3P must devise a plan to remediate such violation and conduct suitable corrective/preventative measures, as well as reporting the status of such correction to Pierre Fabre.

Pierre Fabre may **audit** its 3Ps to verify compliance of their Pierre Fabre-related activities with this 3P Code and other relevant contractual obligations. Upon receiving a request from Pierre Fabre, 3Ps must answer questionnaire surveys, accept on-site inspections, submit related materials and records, and otherwise meet Pierre Fabre’s requests, so as to enable Pierre Fabre to confirm the compliance with this Code.

Pierre Fabre expects that all its 3Ps request their **subcontractors** involved in any activities related to Pierre Fabre to comply with the standards contained in this 3P Code. 3Ps must apply the principles and standards outlined in this document when selecting their own third-parties. 3Ps must have or put in place systems and processes to monitor their subcontractor compliance.



Pierre Fabre has set up a **helpline** for 3Ps workers to report concerns and potential breaches of the 3P Code compliance.pf@pierre-fabre.com. All reports will be treated with confidentiality and professionalism. 3Ps workers will be provided anonymity, if requested and to the extent possible in a specific situation. PF ensures a non-retaliation policy for all reports made in good faith.

Pierre Fabre 3P Help line: +33 5 63 71 44 46
compliance.pf@pierre-fabre.com

3. ENVIRONMENT

3Ps must recognize the importance of preserving the environment and strive to preserve biodiversity, control greenhouse gas emissions, reduce waste materials and drainage, save resources, recycle, and prevent pollution. They must operate through an environmentally responsible, sustainable and efficient business management to proactively respect the environment and minimize any adverse impact on it. They must comply with all applicable laws, regulations and codes related to environment protection.

- 3Ps must obtain all necessary **permits**, licenses, registrations and must implement all reporting and operational systems and processes to ensure full compliance.
- 3Ps must not waste energy and **natural resources** and have systems in place to quantify the amount of water used, energy consumed, and greenhouse gases emitted by their operations.
- 3Ps must avoid the use of **hazardous materials** wherever possible and must implement and employ processes to reuse and recycle materials.
- 3Ps must have systems and processes in place to ensure the safe handling, movement, storage, recycling, reuse, or management of **waste, air emissions and wastewater discharges**. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health must be appropriately managed, controlled, tested and treated prior to release into the environment.
- 3Ps must have systems and processes in place to prevent and mitigate **catastrophic releases** and **accidental spills** and releases of fuels, raw materials, biologicals, chemicals, intermediates, products, and other hazardous materials to the environment.

4. LABOR AND HUMAN RIGHTS

3Ps must fully and proactively respect the human and labor rights of their workers and must comply with all applicable human rights and labor-related laws, regulations and codes.

- 3Ps must **not discriminate** against, under any circumstances, as relates to recruitment, remuneration, promotion, termination, and any other employment conditions, on any basis, including, without limitation, race, color, religion, nationality, citizenship status, language, age, sex, physical or mental disability, physical appearance, medical or personal condition, pregnancy, parenthood, marital status, genetic information, gender identity or expression, sexual orientation, political persuasion, financial status, trade union activities, veteran/military status or any other additional characteristics protected by law.
- 3Ps must provide a workplace that is **free of any human rights abuses and harassment**, including sexual harassment, sexual abuse, corporal punishment, excessive force, psychological, physical or economic coercion, and verbal abuse, or threats of such actions.
- 3Ps must not cause workers to engage in any labor which may have significant physically, psychologically, socially or morally **adverse effects** on them.
- 3Ps must not be involved, under any circumstances, in any forced labor, including labor under conditions of **slavery**, labor with physical or psychological constraint, and human trafficking.



- 3Ps must pay **fair wages** complying with the minimum wage required by local laws, regulations and codes and in any circumstances at a level needed for workers and their family members to live with human dignity. 3Ps must not require workers to work to repay a debt owed to them or to a third party. Wage deductions must not be used as disciplinary measures.
- 3Ps must remunerate overtime work and must ensure that the number of **working hours** and rest time, including vacation time, is humane and complies with the applicable laws, regulations and codes.
- Workers of 3Ps must be provided with a **written work document or contract**, in a language they understand, that contains the key terms and conditions of their work and the respect for human rights, so that they can freely accept and conduct work. It also includes the methods of calculation of their wage and leave time.
- 3Ps must allow their workers to **freely accept or leave** their work, in line with applicable laws, regulations and codes and must not impose advance payments or fees.
- 3Ps must **not confiscate or destroy passports**, driving licenses, immigration documents, other identity papers or the work permits of their workers.
- 3Ps must respect the right of their workers to **communicate openly with management** on their working conditions, without fear of retaliation, harassment or intimidation.
- 3Ps must respect the right of their workers to form **labor unions**, to join or not join labor unions, to participate in their activities, and to engage in collective bargaining.
- 3Ps must **not employ or contract children** who have not yet reached the highest age among (i) 16 years of age; (ii) the age for completing compulsory education; and (iii) the minimum working age stipulated in local laws, regulations or codes. Any work which is hazardous or likely to negatively impact children's physical, mental or moral health, safety or morals must not be done by anyone under the age of 18.
- 3Ps that engage in manufacturing or are in Pierre Fabre's direct materials supply chain must maintain processes and procedures to ensure the **responsible sourcing of minerals**. They must avoid the purchase of minerals that directly or indirectly finance or benefit armed groups or perpetrators of serious human rights abuses. When requested by Pierre Fabre, 3Ps must provide information that shows the source and origin of minerals used by the partner.
- 3Ps must treat **migrant workers** in the same way as local workers.
- 3Ps must respect the land rights, customs, culture, and religion of **indigenous people** in the areas where they operate.

5. HEALTH & SAFETY

3Ps must provide a safe and healthy working environment for their workers and must comply with all applicable health and safety laws, regulations and codes.

- 3Ps must construct, responsibly maintain and continuously improve **workplaces designed to respect the health and safety** of their workers.
- 3Ps must **maintain hygiene** in the workplace and must provide their workers with, as a minimum, toilets and safe drinking water.
- 3Ps must protect workers from overexposure to chemical, biological, and physical **hazards** in the workplace and deliver preventive education accordingly.
- 3Ps must implement systems and processes to **avoid accident risks** when operating machinery, and must provide their workers with necessary protective wear, and preventive education on safety measures, in order to avoid any occurrence of work-related injuries and illnesses.
- 3Ps must make available **safety information** relating to hazardous materials, to educate, train, and protect workers from serious hazards.
- 3Ps must identify and assess **emergency situations and risks** in the workplace, including fires and natural disasters, and must implement emergency plans, emergency routes, and response procedures to protect workers and ensure business continuity.
- The above standards also apply in any 3P-provided living quarters.



6. QUALITY

3Ps must demonstrate commitment to a culture of quality and regulatory compliance for the services and goods they offer, and they must comply with all applicable laws, regulations and codes on quality standards.

- 3Ps involved in pre-clinical studies must comply with **good laboratory practices** and all applicable laws, and codes on the **treatment of animals**. Animal testing may be performed only after serious consideration to replace animals with alternatives. Alternatives must be used wherever these are scientifically valid and acceptable to regulators. When animal testing is absolutely necessary and legal, 3Ps must limit the number of animals used to the strict necessary and must implement systems and processes so that animals are treated humanely, with pain and distress minimized.
- 3Ps must collect and review all safety data in compliance with good **vigilance** practices from research studies, throughout the development process, and during the entire life cycle of a product.
- 3Ps involved in the supply, manufacturing, packaging, testing, storage and distribution of materials/products on behalf of Pierre Fabre, must comply with the **good manufacturing practices, good distribution practices**, and requirements applicable to their activities and to the relevant status of material/product.
- 3Ps involved in clinical trials on behalf of Pierre Fabre must ensure compliance with all applicable regulatory requirements. 3Ps must comply with the Good Clinical Practice guidance and they must follow the ethical principles of the Declaration of Helsinki. Clinical trial 3Ps must provide full visibility to Pierre Fabre of any subcontracted clinical trial activities.
- 3Ps must implement systems and processes to ensure full **traceability** of the products and services they provide, including of ingredients and raw materials.
- 3Ps must not make any **changes in specification**, part design, material, manufacturing process, manufacturing location, or registration status, for any goods that PF will purchase, without prior written approval from Pierre Fabre according to the terms of the Quality agreements
- 3Ps must ensure **on-time delivery** in accordance with Pierre Fabre requirements.
- 3Ps must have a **quality system** and product registrations that comply with all applicable government regulations in the countries in which their products are produced and/or distributed.
- 3Ps must monitor product **quality performance** and demonstrate continuous improvement measured by decreased internal defects, customer complaints and defects shipped. Third parties should have the capability to respond in a timely manner to all complaints issued by Pierre Fabre.
- 3Ps must be opened to receive quality assessment (questionnaire) or quality audits and must complete CAPA plan when requested. 3Ps must not sub-contract without information to Pierre-Fabre.

7. CONFIDENTIALITY, DATA PROTECTION AND IP RIGHTS

3Ps must safeguard and make proper use of confidential and proprietary information to ensure that company, employee, consumer and patient and more generally any third-party privacy rights are protected. They must comply with data (including personal) protection and intellectual property laws, regulations and codes.

- 3Ps must not communicate externally about Pierre Fabre's prospects, performance or policies, or disclose **confidential information** related to Pierre Fabre.
- 3Ps must protect any data or information, stored or processed for or from Pierre Fabre, and act to prevent its **loss, misuse, theft, improper access, disclosure or alteration**.
- 3Ps must protect the confidentiality and security of the **personal data and information** of their workers, and of any other personal information that they become aware of as data controller or data processor as a result of their work with Pierre Fabre, by ensuring implementation of appropriate systems and processes, in accordance with the applicable laws, regulations and codes.
- 3Ps must respect any Pierre Fabre's and third-parties' information protected by patents, trademarks, copyright, trade secret or other **intellectual property** rights, in compliance with all applicable laws, regulations and codes.



3Ps must foster a culture of compliance and ethics within their organizations. They must conduct their business with high ethical standards and must comply with all integrity-related laws, regulations and codes.

- When engaged with healthcare professionals, healthcare organizations, patients or patient organizations, 3Ps must comply with industry standards of conduct that apply to them, such as the European Federation of Pharmaceutical Industries & Associations (EFPIA), the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), the Pharmaceutical Research and Manufacturers of America (PhRMA), and other local codes of self-regulation.
- 3Ps must not engage in **corruption**, extortion, influence peddling and embezzlement. 3Ps must not pay or accept bribes, kickbacks, illegal gratuities, or participate in other illegal inducements, in any business or government relationships. 3Ps must implement and maintain specific rigorous systems and processes to promptly prevent, detect and address corrupt activities.
- When required by laws, regulations and code, 3Ps must disclose **transfers of value** to healthcare professionals, healthcare organizations, patient groups or any covered recipient, in the context of Pierre Fabre-related activities.
- 3Ps must conduct their activities consistent with **fair competition**, in compliance with applicable competition and antitrust laws and with fair business practices. This includes not engaging in abuse of dominant position, concerted practices or other unlawful agreements with competitors and distributors or suppliers.
- All 3Ps marketing and promotional materials and activities related to Pierre Fabre must conform to high ethical, medical, and scientific standards, and comply with all applicable laws, regulations and codes. 3P's promotion and advertising must be **fair, balanced, substantiated, accurate and truthful** and must be limited to the claims, indications and conditions of use approved by Pierre Fabre and by the relevant authorities or permitted by applicable laws, regulations and codes, as applicable.
- 3Ps must conduct their activities related to Pierre Fabre without **conflict of interest**. They make every effort to prevent the occurrence of situations that create a conflict of interest. If any actual, potential, perceived or apparent conflict of interest arises, this must be communicated immediately to Pierre Fabre for an effective and prompt remediation.
- 3Ps must not give **gifts** or provide **entertainment** to Pierre Fabre employees, except for courtesy gifts, modest in scope and value, given openly and transparently, which are customary in the industry, comply with laws, regulations and codes and are in no way capable of influencing any business decision by the Pierre Fabre employees.
- 3Ps must comply with all applicable customs, import and export controls, sanctions, and other **trade compliance** laws.
- 3Ps must never be involved in masking the true origin of money or assets that are connected to a criminal activity. 3Ps commit to taking all appropriate measures to prevent their activities from being used as vehicles for **money-laundering**.
- 3Ps are committed to fighting **counterfeiting**.
- 3Ps must preserve the reputation of Pierre Fabre and be extremely attentive to their **public statements** involving Pierre Fabre, particularly on the Internet and in social media. Any such statements must be agreed by Pierre Fabre in advance.

3Ps must implement and use adequate and effective compliance programs that help ensure compliance with this 3P Code, and their own legal and ethical obligations. They must allocate appropriate resources to this effect.

- 3Ps must implement the necessary **risk assessment** concerning the key risks impacting their Pierre Fabre-related activities and proactively manage the related risks via an effective **risk governance**.
- 3Ps must implement the necessary **policies, procedures, processes and systems** aimed at complying with this 3P Code.
- 3Ps must regularly **train their workers** on the expectations of this 3P Code.
- 3Ps must have control mechanisms to **monitor** and manage risks in all areas addressed by this 3P Code.
- All 3P workers should be encouraged to **report concerns** or potential illegal and unethical activities in the workplace without fear of retaliation, through open reporting lines or helplines by the 3P. 3Ps must investigate and take appropriate corrective action, as needed.
- 3Ps must **continuously improve** their internal control environment by establishing objectives, implementing plans and taking appropriate corrective actions for any deficiencies identified by internal or external assessments, inspections, or management reviews.
- 3Ps must maintain **books and records** in accordance with international accounting principles. Records must be complete and accurate in all material respects. Records must be legible, transparent and reflect actual transactions and payments. 3Ps must not use any “off the books” or similar funds.
- 3Ps must **maintain documentation** that demonstrates compliance with this 3P Code and applicable laws, regulations and codes. They must make such documentation available to Pierre Fabre or any external authority upon request.
- 3Ps must develop and implement appropriate **business continuity** and **crisis management** plans for operations supporting Pierre Fabre business. These plans should be designed and kept current to promptly recover and restore partially or completely interrupted critical functions to minimize disruption to Pierre Fabre business and protect Pierre Fabre reputation.
- 3Ps must cooperate with investigating **government agencies** charged with enforcing compliance as and to the extent required by the applicable laws, regulations and codes.