

D CHARTER T A



introduction/

Pierre Fabre Group stands out for its strong culture developed by its founder, Mr. Pierre Fabre, based, from the beginning, on the values of rigour, integrity, accountability, citizenship, and respect for people, and placing ethics at the heart of its operations. Thus, the activities of the Pierre Fabre Group (“Pierre Fabre”) are based particularly on its commitment to strictly respect the ethical standards contained in its Ethics Charter and to comply with all applicable laws, regulations and codes.

As part of its digital transformation, Pierre Fabre is aiming for a **data-driven approach, to make the right decisions systematically, responsibly and rationally** by making use of this shared asset that is the company's data.

The term “Data” firstly refers to any structured or unstructured information, consisting of a measured, observed or calculated value and secondly to the information that describes it, also called “metadata” (*see Annex for definitions and examples*).

This transformation implies combining compliance with obligations and with the most extensive possible use of data in all areas of the company.

Consequently, to provide itself with an ethical framework and to participate in the development of a responsible Data economy, **Pierre Fabre expects its employees to comply with the various internal rules** set out below and covered by this Charter.

This Charter is supplemented by the Operational Data governance and management rules. Together, they form an inseparable whole. The Charter does not replace the discipline that every employee must apply to the use of the Data they have access to, but rather provides a framework for it. **Properly managed, Data will become a strategic asset for the company in the same way that patents, formulas, buildings and resources can be.**

Why this charter?

This Data Charter is an extension of the Ethics Charter, specifying the expected behaviour of Pierre Fabre employees regarding access to Data and its uses in all of Pierre Fabre's activities and operational processes.

The challenges are twofold:

- **Develop** responsible data usage, in order to **guarantee and strengthen all stakeholders trust** (employees, patients, consumers, partners, authorities) and to preserve the company's image, etc.
- **Make responsible decisions**, based on quality facts and analysis.

Considering that each employee, to perform their tasks and for the benefit of the company, must have easy and informed access to as much Data as possible, therefore this right of access must be accompanied by a set of duties and responsibilities.



Information assets

Each employee is committed to creating value, i.e. enriching the company's Data assets by:



Producing relevant Data and metadata aligned with the company's quality level requirements,

Producing value using all accessible Data compatible with their role's need,

Sharing the produced data and metadata with any potentially relevant staff,

Providing the necessary assistance to any employee, to correctly understand and use the Data produced, and thus **contributing** to the continuous improvement of knowledge.

Professional integrity

In processing the Data that an employee may have access to under the defined governance rules, an employee must ensure that their activity of producing, modifying, disseminating, using and communicating Data (or what is learnt from it) is justified in regard with the company's activities and complies with the laws, regulations and professional or internal codes applicable to the areas to which the Data relates to.



Privacy and data protection

All employees must:

- Use the Data, particularly the ones identified by the company as confidential and/or proprietary, in conditions that guarantee the protection of companies rights, as well as the rights of, employees, consumers, patients and, more generally, third parties, and to comply with applicable laws, regulations and codes,
- Not disclose Data of any kind or content externally without prior authorisation,
- Take all measures to prevent the loss, misuse, theft, inappropriate access, disclosure or alteration of such Data, particularly by strictly complying with the security rules defined by the company,
- Maintain the confidentiality and security of personal information and data,
- Protect the Data by conscientiously respecting the rules of conservation, dissemination, reproduction or destruction applicable to them.



Intellectual property rights



All employees must:

- Ensure that the company's intellectual property rights **are** protected as intangible and essential elements of its assets. These assets include all patents, designs, brands, domain names, copyrights and other scientific knowledge belonging to our company.
- Pay particular attention to the company's procedures for recording and publishing research and development data, whether raw or transformed (such as analytical results).
- Respect the intellectual property rights of third parties by refraining from any actions or practices that may prejudice the company's third-party partners intangible rights and by reporting any fraudulent or inappropriate use they are aware of.



Advice and assistance

All Pierre Fabre employees are invited to seek advice and assistance from their superiors for the implementation of the present Charter and to report any activity contrary to its provisions, including by using the Pierre Fabre Alert System.

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Definitions/

The following definitions are intended to define and determine the concerned information scope as clearly as possible.



Data

“ *Facts, figures and statistics collected together for reference or analysis.* ”

(GxP Data Integrity Guidance and Definitions, 2018)

“ *...Original Record (Data) which can be described as the first capture of information, whether recorded on paper or electronically...* ”

(GxP Data Integrity Guidance and Definitions, 2018)

Behind this general definition of data, there are various types of data that need to be clarified:

Data can be raw or transformed:

- **Raw data** is the result of a measurement or observation, without any reasoning, assumption, finding, probability, calculation or interpretation.

E.g. the weight measured on a scale.

- In contrast, **transformed data** is data that is the result of a calculation, interpretation, reasoning, supposition, etc., based on other data (raw or calculated).

E.g. Body Mass Index, calculated according to weight and height.



Data can be structured or unstructured:

- **Structured**, when the data (words, signs, numbers, etc.) is controlled by reference systems and presented in boxes (the fields of a database) that allow it to be interpreted and processed by machines.

Eg: the age of a person, in numeric format (2-digit integer).

- **Unstructured**, when the data is not organised in a database, i.e. office documents, email, images, videos, etc.

Eg: X-ray images from a clinical trial, stored in an electronic document management system.

Data can be produced by a company resource (so-called internal data) or acquired by the company from a third party, either free of charge or for a fee (so-called external data).



Metadata

“ *Metadata are data that describe the attributes of other data and provide context and meaning. Typically, these are data that describe the structure, data elements, inter-relationships and other characteristics of data e.g. audit trail. Metadata also permit data to be attributable to an individual (or if automatically generated, to the original data source), electronically...*

(GxP Data Integrity Guidance and Definitions, 2018)



Metadata is data used to define or describe another piece of data, regardless of its medium (paper or electronic). It is possible to define the context of a structured or unstructured data from its metadata set.

E.g. the weight unit, the date of the measurement and the name of the operator are the metadata characterising the result of a weighing (structured raw data).

E.g. The date and GPS coordinates of a shot are a photograph metadata (unstructured raw data).





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