

Code of Conduct

Our code serves as the moral compass that guides us when chasing the miracles of science to improve people’s lives.

sanofi

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Message from our Chief Executive Officer



Paul Hudson
Chief Executive Officer

At Sanofi, we chase the miracles of science to improve people's lives.

This common purpose, bold yet humble, unites all Sanofi employees across the world in our ongoing quest to make life better for the people and communities we serve. It is the compass that guides us in the work we do every day.

But our purpose is more than just words; it's the actions we take to earn the trust of our stakeholders – and the way we show up for one another – that really matters. Embracing our Play to Win behaviors, sticking to a clear, long-term strategy and creating a culture that allows people to bring their whole selves to work, ignites our progress while maintaining the utmost ethical standards.

Our Code of Conduct summarizes all these elements.

> It is our *company's "constitution"* and a pre-requisite, mandatory read for all Sanofi employees and those we do business with.

It also represents a public commitment to our stakeholders – healthcare professionals, patients, scientists, investors – who are entitled to know what we as Sanofians value and how we are playing to win with integrity.

As a world leader in healthcare, we have a responsibility to be both ethical in our endeavors while also striving for change that matters. It is our mission to contribute to elevating the voice of patients, highlighting the importance of scientific innovation, and building sustainable healthcare systems with all of our stakeholders.

Just as our society continues to evolve and modernize, so must we. Whether technological, scientific or cultural, we are always adapting. The data and digital revolution has only begun to reshape healthcare systems. The mobilization for greater social justice and equity calls for quick, concrete corporate actions. The fight against climate change requires long-term planning. As a company, we must understand and mitigate the risks these evolutions can have on our operations and reputation, and, of equal importance, leverage the opportunities they can bring to help us create real, measurable impact.

Every employee has a responsibility to uphold Sanofi's values and a role to play in driving our success as a modern healthcare company. A company that is always focused on conducting business responsibly and respecting human rights. A company that takes thoughtful risks to develop breakthrough medicines and vaccines and make them accessible to people who need them as quickly as possible. A company that puts diversity, equity and inclusion, as well as health and environmental sustainability at the core of its ambitions. A company that is always focused on doing the right thing, the right way.

Message from our Chief Ethics & Business Integrity Officer



Julien Durand
Chief Ethics & Business Integrity Officer

We work in an industry whose purpose is to innovate to save *people's lives* and *preserve public health*.

Such a unique purpose comes with heightened expectations. Responsible innovation is therefore at the heart of everything we do and *this Code of Conduct supports us along that journey*.

As the world confronts tremendous change and technological innovation grows exponentially, we venture into the unknown in the pursuit of the miracles of science. Many of the decisions and challenges we will face will be less black or white, but a lot grayer. Ethics and innovation will be our compass, guiding us and allowing us to succeed in our mission to discover the extraordinary. It will differentiate us from the others: what we call Play-to-Win with Integrity.

The traditional boundaries of the company are broadening and shifting from enterprise to ecosystem. Hence our conviction that Sanofi's commitment to integrity must extend beyond our employees and business partners. This includes our engagement with patients, healthcare professionals, providers, payers, authorities, NGOs, IGOs and many more to shape a responsible healthcare ecosystem.

Improving the lives of millions of people around the world through ground-breaking health innovation requires a *culture* that is driven by *trust*, *integrity* and *thoughtful risk-taking*.

Avoiding excessive caution and carelessness allows us to find the right balance between opportunities and risks, to make bold and informed choices, always putting patients first.

Ethics-by-design, Thoughtful Risk Taking, simplified ways of working, co-design with stakeholders, sustainability and transparency are fundamental building blocks of our strategy.

Tomorrow's most valuable and enduring companies will be those that support such efforts today.

Having the courage to do the right thing, at the right time and for the right reason, by upholding our commitment to integrity every day in each act we undertake is our True North. This is rooted in organizational justice and psychological safety, including an openness to speak-up, challenge the status quo and give opinions without fear of retaliation.

This Code of Conduct covers the dimensions we believe are essential to achieving our commitment to patients and society, including our actions to maximize opportunities and mitigate risks in each of these areas of our business.

Our employees and partners have access to a variety of resources and initiatives supporting the Code of Conduct. We also recognize the rapidly changing landscape we work in and Sanofi is dedicated to continuous learning and improvement over time.

We count on all of you *to Play Your Part* and become true *ambassadors of our Code of Conduct*. That's how we will accelerate our *cultural transformation* and *pursue our noble purpose*.



To whom does this Code of Conduct apply?

To whom does this Code of Conduct apply?

Our Code applies to all Sanofi employees and anyone who works for or on behalf of Sanofi such as contractors, suppliers, direct customers and third-party sales and marketing intermediaries, strategic alliances, and joint ventures. It helps us to understand the values and expectations that guide our work. It describes the behaviors we all need to demonstrate in order to bring our values and expectations to life. Just as important, it helps us fulfil our purpose of helping people feel better and live longer. Understanding and living our Code is a condition of employment at Sanofi and a condition to doing business with Sanofi. Sanofi promotes high standards of ethical & responsible conduct with all our stakeholders, including healthcare professionals and providers, governments, research institutions, and patient organizations.

> This Code is the *foundational reference document* underlying the Sanofi standards and procedures that support *a culture of integrity* across our organization and with all those with whom we interact.

There may be instances when the specific application of the Code varies, depending on local laws or regulations. In cases where this Code sets forth higher standards of conduct than those set in local laws or regulations, our Code must prevail. Where local laws or regulations impose higher standards of conduct than those set in the Code, local laws and regulations must prevail.



Sanofi *Culture* and *Strategy*

Our purpose and ambition

We are one Sanofi, a modern healthcare company bringing together dedicated, talented people and innovative science to *transform the practice of medicine*. Today, we are driven by a unifying purpose: *we chase the miracles of science to improve people's lives.* We share a common ambition: turning the impossible into the possible for millions of people around the world.

We are committed to society, getting medicines to the people who need them most, taking better care of the planet and reflecting the diversity of the communities we serve.

Our Play to Win strategy

Our bold strategy is based on four key priorities:

- We *focus on growth,* prioritizing our portfolio to strengthen our company profile.
- We *lead with innovation,* bringing transformative therapies to our patients.
- We *accelerate efficiency,* taking decisive actions to reinvest in our pipeline.
- We *reinvent how we work,* creating an organizational culture that empowers our people and promotes accountability.

Our integrated Corporate Social Responsibility strategy

Our Corporate Social Responsibility strategy focuses on four building blocks aligned with our Play to Win core business strategy:

- We *commit to affordable access,* ensuring global access and affordability to health, while helping healthcare systems to remain sustainable
- We *are at the cutting edge of Research and Development for unmet needs,* helping people live fully.
- We *care for the Planet,* minimizing the environmental impact of our business, while strengthening our resilience to environmental changes.
- We *act in and beyond the workplace,* giving all Sanofi colleagues the chance to become a leader of change, unlocking the potential of our diverse teams.

Our employee value proposition

Our promise to our employees is to pursue progress and discover extraordinary together: better science, better medications, better outcomes. All that progress needs people. People from diverse backgrounds, in various places around the world, performing distinct roles all united by one thing: a desire to chase the miracles of science to improve people's lives.

As Sanofians, we are those people who:

- *Explore more,* sharing our purpose and our skills.
- *Chase change* and embrace innovative ideas.
- *Do right* for our business, patients, society and the planet. We are committed to making the right decision and taking action even when it is the harder thing to do.
- *Make miracles,* taking thoughtful risks to find better solutions for the people we serve.

Our culture and behaviors

We want everyone to be in a position to play to win, bringing their whole selves to work. Our purpose is enabled and activated by four key behaviors:



We stretch

we challenge ourselves to work smarter not harder, to take thoughtful risks and dare to try new things because we believe better is out there.



We take action

we make informed decisions and are proactive about delivering results. We prioritize what will have greatest impact, take personal responsibility for getting things done and look for solutions to problems.



We act for patients and customers

we ensure that we support our pipeline by using our time and money resourcefully and we take inclusive, informed decisions that will best serve our communities.



We think One Sanofi

we put our Purpose first by doing the right thing, sharing with and learning from each other, and prioritizing collective progress.



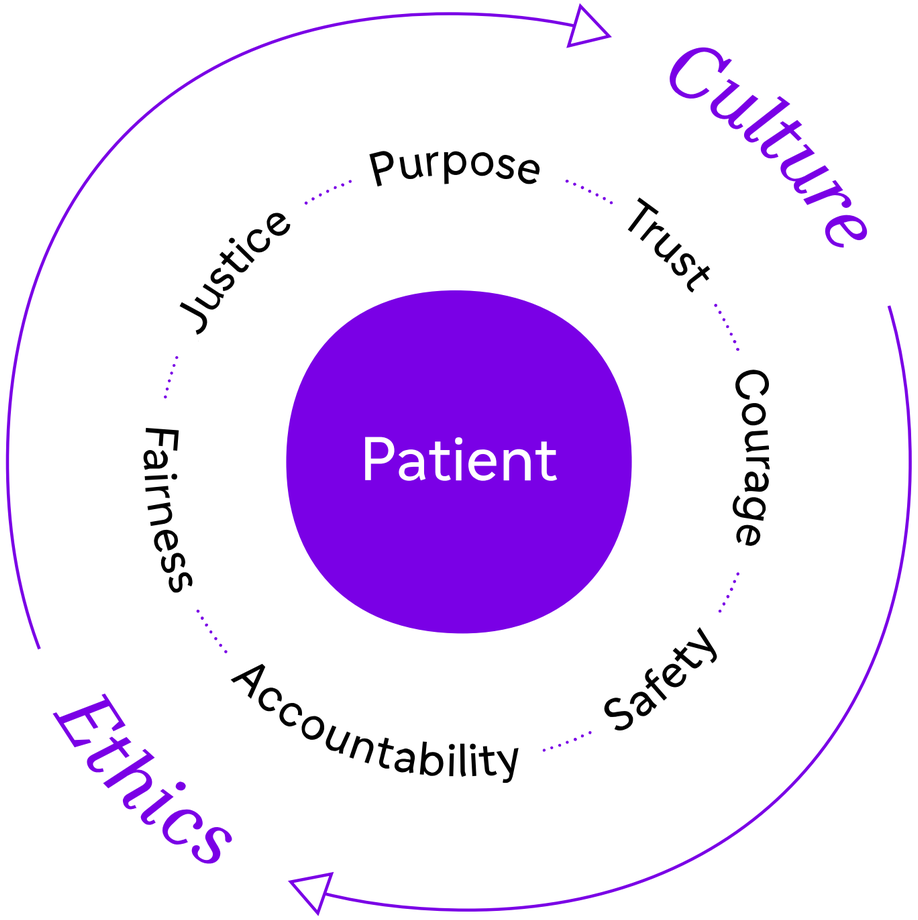
Ethics and *Risk* culture

To chase the *miracles of science*, we need a *strong moral compass*.

A bold and noble purpose like ours requires a culture that drives and is driven by ethics and business integrity. It means all of us bring our best ethical selves to work so that we make the right decisions for the people we serve.

To achieve that, our decision-making framework grounded on thoughtful risk-taking, fairness and ethical principles guides us at every level to *do the right thing*.

This means also taking responsibility for our actions to deliver the best outcome to our patients, customers, and stakeholders.



Our Culture of Ethics

When we act in line with our Code of Conduct principles, our culture and ethics feed one another, creating a "*virtuous ethical circle*."

For example, when we pursue fairness and justice, we foster an ethical and safe environment – and enable greater trust, accountability, and courage from our people to ask the right questions and challenge the status quo. All these together help us deliver on our purpose, with patients at the center of our thinking.

Our Code of Conduct defines and helps us apply our *moral compass*, guiding us to make decisions *ethically* and *fairly*.

Thoughtful Risk-Taking is how we make decisions at Sanofi

Transforming the practice of medicine is challenging. Those challenges should not cast a shadow on the exciting opportunities that lie ahead of us and the positive impact of our science on people's lives.

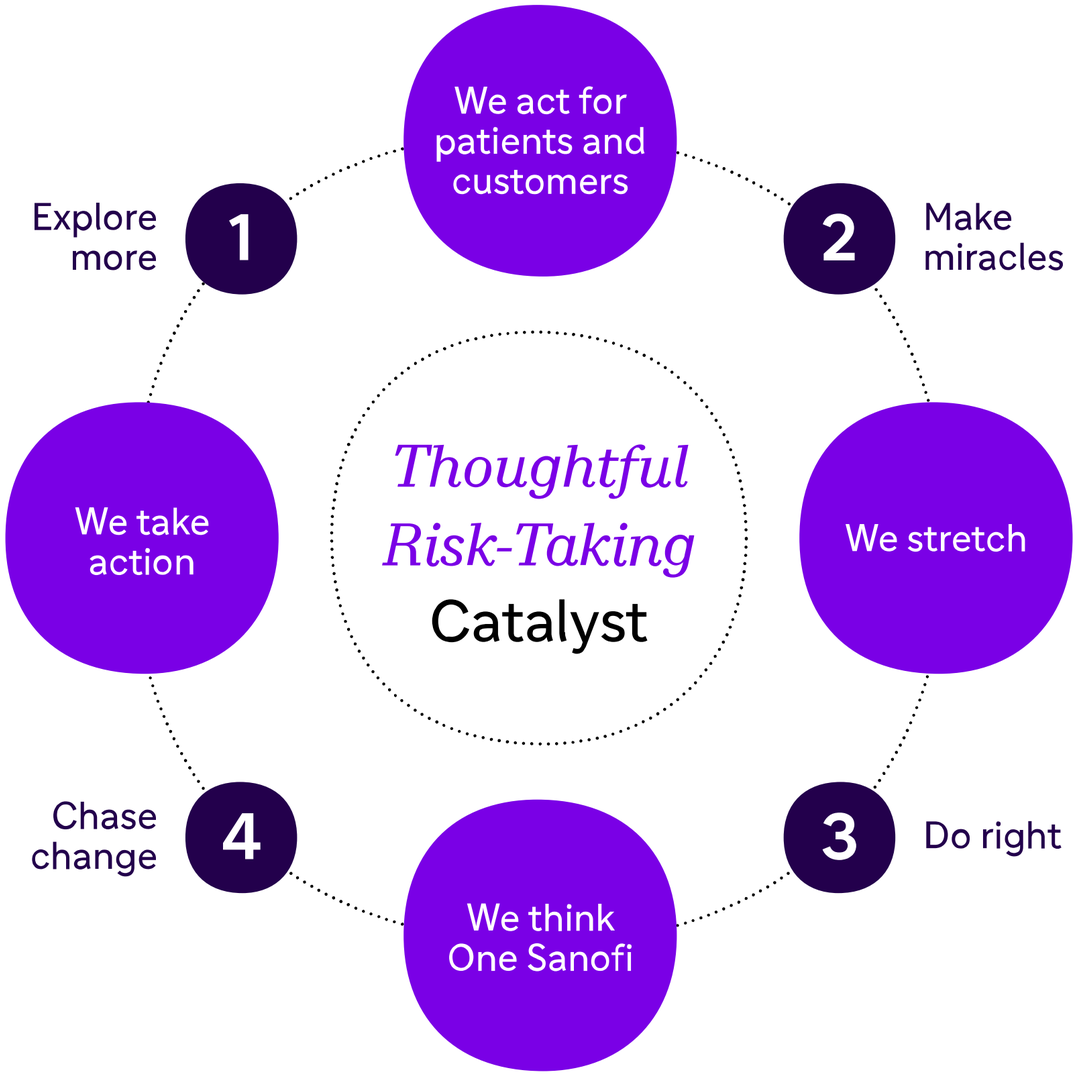
To achieve breakthroughs, we need to safely unlock our innovation potential while maintaining the highest standards of ethics and business integrity. We know that with great rewards come risks. And in the fast-moving, uncertain world of healthcare, we need to weigh the risks and opportunities involved and be transparent about our motives. To achieve this, we rely on a common decision-making framework.



What is Thoughtful Risk-Taking?

Thoughtful Risk-Taking is about making the right decisions by *maximizing opportunities* while *mastering risks* in the so-called *"The Purple Zone"*.

It requires us to find the right level of risks we can take within the risk appetite of our company, *avoiding excessive caution or carelessness,* so that we seize the opportunities at the right time and deliver the best outcome to our patients, customers, and stakeholders.



Thoughtful Risk-Taking is an enabler of our organizational culture and a catalyst of our employee value proposition and Play to Win behaviors. It reflects the way we behave, make decisions and take responsibility.

Thoughtful Risk-Taking is never reckless. We do not compromise our integrity. We do not break the law or contravene our policies. We do not put our patients, our people, or the planet at risk.

At Sanofi we are all empowered to embrace a Thoughtful Risk-Taking mindset using our *TRT* principles:

Thoughtful: We rely on the sound judgment of our people and our values to do the right thing. We involve the right stakeholders to seek diversity of views and expand our thinking. *We are ethical and inclusive.*

Risk: We balance risks and opportunities to make informed and bold choices and ensure the benefits outweigh the risks. We keep patients and customers in the center of our thinking when coming up with solutions. *We are bold and driven by a common purpose.*

Taking: We follow a pragmatic approach with clear decision-making roles. We take responsibility for our decisions, celebrate successes, and come together as One Sanofi to learn from unexpected outcomes. *We are empowered and accountable.*



How to apply thoughtful risk-taking?

A decision-making process consisting of 6 simple and practical steps has been designed to guide us when we make decisions every day, asking ourselves the right questions and applying the TRT principles:

- Step 1: Define
- Step 2: Involve
- Step 3: Evaluate
- Step 4: Decide
- Step 5: Execute
- Step 6: Learn

It is what we call "*TRT experience*".

It helps us activate the right mindset and follow a common and consistent approach to making the best decisions at every level of the organization.

And as we go through the TRT experience, we are invited to reflect on our decisions, considering what worked well and what could be improved and ensure that best practices and lessons learnt are shared to collectively grow.

Fair & ethical decision-making

Making fair decisions

Making a fair decision is about avoiding bias and ensuring transparent, objective, and equitable criteria throughout the process. This means also gathering and evaluating all relevant information, hearing from the people who will be affected by the decision and providing a clear and meaningful rationale for our decision.

Navigating the grey areas

To pursue progress, we must make complex decisions every day. These decisions aren't always binary – so how do we navigate the grey areas? And what does *doing the right thing* look like, beyond the obvious of following the laws and regulations?

To make ethical decisions, we need to understand two things: (1) the potential consequences of our actions and (2) our motivation for those actions.

This means taking responsibility for the result of our decision and relying on our well-informed judgment to do the right thing, through a *continuous self-questioning*:

- Is my decision in line with our purpose to chase the miracles of science to improve people's lives?
- Is my decision in line with Sanofi's values?
- Am I violating any laws, any Sanofi policies, procedures, or anything set out in this code?
- Am I exposing Sanofi to internal or external criminal threats?
- Am I putting collective interest before my own personal interest?
- Am I treating others in the same way I would expect to be treated?
- Would I be comfortable with the public reading about my decision online forever?

If the answer to any of these questions is "NO," ask for help.

Organizational Justice

What is Organizational Justice?

The way we behave as a company has a direct impact on our people. To make Sanofi a fair and safe workplace, we foster a culture where people feel that they have been treated fairly, their fundamental rights at work are respected and they are not afraid to speak up, ask for help or challenge what does not look, feel or seem right.

The key components driving Organizational Justice are the Code of Conduct and balanced, inclusive policies, anti-retaliation principles, fair and consistent disciplinary actions, and Speak Up.

Zero-tolerance

In its commitment to fostering a culture of ethics, business integrity and mutual respect, Sanofi prohibits any conduct that may negatively affect a person's dignity or have a damaging impact on Sanofi or its reputation.

We do not condone or support any form of fraud, harassment (e.g., physical, sexual, psychological, verbal, or of any other form), discrimination (e.g., on the grounds of gender, gender identity, age, origin, race, heritage, religion, sexual orientation, physical appearance, health, disability, trade union activity, political opinions, nationality, family situation, or on any other grounds), retaliation or violations of human rights. These behaviors are fundamentally incompatible with our core values and will be subject to a zero-tolerance approach across all our operations globally and in relation to all employees.

Non-Retaliation

Employees, contractors, business partners, suppliers, and value chain workers who report or participate in an investigation related to a suspected violation of an applicable law or principle, will not be subject to any adverse action (e.g., discrimination, retribution, or disciplinary action), unless they themselves were involved in the wrongdoing.

Sanofi does not condone and takes a zero-tolerance approach to any form of retaliation, which should result in disciplinary action for the retaliating individual, up to and including termination.



Speak Up

As Sanofians, we all have a part to play in building a healthy working culture, where we can bring the best of ourselves to work, do right and build psychological safety and trust at all levels of the organization

Our global Speak Up program empowers employees to:

- ***share constructive, focused, timely and actionable feedback*** to build high-performing teams,
- ***openly debate ideas***, share opinions and ask for input, to promote diversity of views and drive better decisions,
- ***challenge the status quo*** to empower Sanofians to drive simplification, positive change and influence results,
- ***raise concerns*** and bring problems to light to promote fairness, accountability and to keep Sanofi, our patients, partners, and ourselves safe.

Sanofi Ombuds Office

Sanofi launched its internal Ombuds Office in 2024. The Sanofi Ombuds Office is a global network of peers who have been trained to provide independent, impartial, confidential and informal support for employees to overcome disputes, conflicts and barriers that stand in the way of reaching their full potential.

The Ombuds Office does not replace the existing reporting channels, the Speak Up Helpline or internal investigations, but complements them. Through the Ombuds Office, Sanofi will be able to add additional guidance and support to address issues promptly, fairly and at the appropriate level; improve communication and dispute management skills; maintain a transparent and open corporate culture; preserve relationships and reputations; and promote an engaged and positive organization.

Bound by the Sanofi Ombuds Charter and the obligation of Ombuds-reporter confidentiality, the Ombuds will protect the identity of the individuals contacting them and the information shared, unless the Ombuds determines there is an imminent threat of serious harm to a person or property, at which point the Ombud will escalate to the appropriate resource.

Only aggregated data to report on usage and trends of the Ombuds Office will be reported to Sanofi management and the Ombuds will not disclose reporter details to any person, including to supervisors, management, leadership or external parties.



Sanofi Speak Up Helpline

How to raise a concern?

Any Sanofi employee, contractor, business partner, supplier, value chain worker, and stakeholder who has a concern and believes in good faith that a law, policy, or the Sanofi Code of Conduct has been or is about to be violated has the duty to raise it. These concerns should be reported to the Speak-up Helpline, which is a safe channel operated by a third-party vendor and overseen by the Ethics and Business Integrity department. The Speak Up Helpline is available to any Sanofi employee, contractor, business partner, supplier, value chain worker, and stakeholder, internally or externally.



speakup-sanofi.com

Reports to the Speak-Up Helpline can be made through a web-form or via a toll-free number available to all stakeholders mentioned above in multiple languages 24 hours a day, 7 days a week. Reporting can be made anonymously; however, anonymity may limit the ability to fully and thoroughly assess or investigate a concern.

The system allows reporters to check and follow-up on their reports (even if submitted anonymously) and to also check if responses, updates, or requests to provide further details or information have been posted.

In addition to the Speak-Up Helpline, Sanofi employees can raise a concern with their line manager(s), human resources, or via another channel that an employee considers to be the most appropriate. Whatever channel an employee uses to speak up, they will not be subject to discipline or discrimination, if they act in good faith and with no malicious intent, even if the facts reported prove to be inaccurate or no further action is taken.

Any Sanofi employee to whom a concern has been reported must promptly raise it to the Speak-Up Helpline or the relevant Ethics and Business Integrity Lead.

Maximize *opportunities* & minimize *risks*

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Championing Diversity, Equity and Inclusion

At Sanofi, we want to reflect the diversity of our communities, unleashing our whole selves every day to transform the practice of medicine. We want to make an impact in the world through who we are, what we do, and the way we do it, and we recognize that the only way to really do this is to do it together and by being "All In".

We believe in reflecting the diversity of our communities and providing an inclusive and equitable workplace to help the best of our whole selves to transform the practice of medicine. Diversity, Equity and Inclusion are integral to Sanofi's Play to Win strategy. They help us reinvent how we work and drive our cultural transformation through:

- Building Representative Leadership: We must build leadership teams that reflect the diversity of the communities we serve so we can leverage a wider range of perspectives and be more fully connected to our patient, employee, customer, and stakeholder needs.
- Creating a Work Environment where we can bring the best of our whole selves: Through diversity, equity and inclusion, our employees must feel able to unleash their full potential so we can foster creativity and innovation.
- Engaging With Our Diverse Communities: to change the practice of medicine, we must be citizens of the world, advocating for inclusion and diversity with our external stakeholders.

How we Maximize *Opportunities*

- By raising awareness and deepening understanding. We address diversity, equity, and inclusion in our own communication, and catalyze conversations at all levels to drive greater equity of gender, culture and origins, LGBTQ+, generations, and ability.
- By enhancing creativity and innovation. We build teams that reflect the diversity of our employees, as we believe combining the distinct identities of our people and business partners is a source of strength and a key ingredient of our success.
- By making sure our workplaces are accessible. We ensure accessibility on our sites, provide inclusive technologies, and promote ways of working that will allow all employees to be fully productive.
- By committing to better represent the diversity of patients in our clinical trials.
- By increasing the inclusion of historically under-represented groups in our sourcing processes through Sanofi's supplier diversity program

How we Minimize *Risks*

- We have zero tolerance for harassment (e.g. physical, sexual, psychological, verbal, or of any other form) and discrimination on the basis of: gender, identity, age, origin, religion, race, heritage, sexual orientation, physical appearance, health disability, trade union activity, political opinions, nationality, family situation or on any other grounds.
- We prohibit any conduct that may negatively affect a person's dignity.
- We avoid homogeneity by providing employees with the support they need to guarantee that their voices are heard.



Respecting and Upholding Human Rights at work

At Sanofi, our dedicated workforce stands at the forefront of delivering on our commitment to patients and society. Recognizing that Sanofians are our most valuable asset, we hold unwavering dedication to upholding their rights across our global operations. We expect our business partners to mirror our commitment, respecting the rights of their own employees.

We are committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and applicable International Labour Organization (ILO) Conventions*[1]* throughout our activities and those of our business partners. Our commitments, detailed in our Human Rights Policy Note, comprise the following:

- We support the right of children to a childhood free of work responsibilities. We prohibit the employment of young persons under the age of 15 and that of young persons aged 15-18 for hazardous work*[2]*.
- We strictly prohibit all forms of forced, bonded, indentured, or compulsory labor including modern slavery and human trafficking.
- We support the right to establish and join associations and/or labor unions for the promotion and defense of workers' interests. We prohibit all forms of reprisal or discrimination towards association and union members.
- We comply with all applicable laws and collective agreements including those relating to working hours, overtime, maximum hour rules, meal and rest periods and paid leave.
- We create and promote a safe and healthy workplace and implement rigorous health and safety standards.

[1] Applicable ILO Conventions are : 1, 14, 29, 30, 87, 95, 98, 105, 106, 131, 138, 155, 161, 182 and 187

[2] Hazardous work include work which exposes children to physical, psychological or sexual abuse; work underground, underwater, at dangerous heights or in confined spaces; work with dangerous machinery, equipment and tools or carrying heavy loads; exposure to hazardous substances, agents or processes, or to temperatures, noise levels or vibrations damaging to health; work for long hours, night work

How we Maximize *Opportunities*

- By having a set out effective cross-organizational and collaborative efforts to fulfil our commitment to respect human rights at work
- By fostering an environment that supports and encourages open social dialogue on labor issues
- By raising awareness among our employees and business partners on human rights, our commitments, processes to assess risks and report impacts

How we Minimize *Risks*

- We embed our standards on human rights at work in our overall business management system to ensure they are taken into account in the way we conduct business
- We have due diligence processes in place to identify and address labor rights risks and impacts in our own operations and those of our business partners



Fostering Psychological Safety and Wellbeing

As our purpose is to improve people's lives, we are committed to upholding respect for physical and psychological health, safety, and wellbeing of Sanofians.

Within Sanofi, we create an environment where everyone can feel safe and supported to bring their whole self to work. This enables innovation and creativity, so we can pursue progress for the people we serve.

We want every Sanofian to have a purposeful experience. That's why we make physical and psychological health, safety, security and wellbeing a priority. Our "All Well" approach includes:

- Healthy minds: supporting emotional and mental wellbeing;
- Healthy working culture: building a culture that is respectful, supportive and inclusive at all levels;
- Healthy financials: helping each of us manage and stay in control of our finances at all stages of life;
- Healthy body: supporting good physical health, focusing on prevention and quality healthcare and
- Healthy working conditions : Securing working conditions at the workplace and when travelling.

We understand that for Sanofians to embrace Play to Win behaviors, we need to:

- secure a foundation of physical and psychological health and safety;
- build mutual and interpersonal trust; and
- enable our employees to feel safe, speak-up, and take thoughtful risks.

These goals align with our Organizational Justice principles on speaking up and reporting concerns to promote a safe, secure, and positive working environment.

How we Maximize *Opportunities*

- By building psychological health and safety at every level of our organization through learning and development opportunities to increase engagement, performance and the motivation to take thoughtful risks to bring innovative solutions.
- By encouraging more feedback and delivering more impact by measuring and tracking levels of psychological safety through annual surveys.
- By supporting physical wellbeing and a healthy lifestyle through various initiatives such as Move Often, Eat Well, Stay Healthy, and Sanofi's quality healthcare programs, offering many practical tools, awareness campaigns and prevention programs.
- By including advice on psychological, financial, and legal topics in our Employee Assistance Program ensuring our people always have somewhere to turn to should they struggle in their personal or professional lives.
- By fostering a healthy working culture by implementing a working environment where our people feel empowered to perform, safe to raise their voice, and supported, whoever and wherever they are, through programs such as Gender-Neutral Parental Leave.
- By enabling our employees to engage in or maintain business in uncertain areas by mitigating their exposure to security.
- By supporting the education of our employees, business partners, and stakeholders as well as the dissemination of accurate and routine information to patients and stakeholders through diverse channels, we advance innovation and scientific knowledge and understanding while empowering individuals to improve human health.

How we Minimize *Risks*

- We prevent psycho-social risks through various initiatives. These include awareness programs, diagnostic tools to detect early manifestations as well as mental health education and a 24/7 global Employee Assistance support hotline.
- We provide support to minimize the impact and risk of unfortunate life events. We provide our employees with tools and resources to help them stay in control of and plan for their future.
- We facilitate a culture of speaking up without fear of retaliation. Our people should feel confident in the knowledge that a raised concern will be investigated and, if warranted, followed by actions that treat all concerned fairly and justly, in line with our organizational justice principles.
- We deploy dedicated travel, events, and sites audit programs to keep our employees secure while they operate.



Safeguarding Data Privacy and Protecting Information

Sanofi is committed to data privacy and information security at every level of our organization for the benefit of patients, our employees, and stakeholders and to ensure full compliance with regulatory obligations.

Digital transformation, AI and data democratization are strengthening how Sanofi interacts with people and organizations to achieve our purpose. Processing data, from collection to storage, is now a key component of our relationship with patients, healthcare professionals, members of the scientific community, customers and users of our products and services, and our employees and business partners. To safeguard data privacy, we have implemented a Global Privacy Governance and Risk Framework that ensures optimal protection of personal data. We have also adopted a Cybersecurity and Security Framework to maintain the security and confidentiality of our information technology systems, assets, information, and databases.

How we Maximize *Opportunities*

- By implementing and constantly enhancing best practices in data privacy and information security, Sanofi builds trust in and provides legal certainty for our vital data and sensitive information ecosystem.
- By providing expertise, guidance and support to our employees and stakeholders, we help them make the right decisions when collecting, processing, and sharing personal data, in line with our values.
- By applying a risk-based approach in designing proportionate controls to maintain operational efficiency while meeting the privacy expectations of patients, individuals and regulators.
- By enabling Sanofi's digital strategy through providing innovative tools and guidance, we implement privacy-by-design and data security as of the initial stages of each project.
- By developing a pro-active approach to data privacy, we align our objectives and foster confidence with data protection authorities and other regulatory bodies.

How we Minimize *Risks*

- We recognize the variations of regulations in the countries where we operate and we implement a Global Privacy Governance Framework and Information Protection policies, consisting of standards, procedures, templates and tools designed to ensure compliance with applicable privacy laws and security standards.
- We protect Sanofi information against the risk of loss and unauthorized disclosure using Information Classification Standards. It applies equally to information about Sanofi, its employees, its patients, and its business partners. Any person sharing confidential information without permission, will face disciplinary actions.
- We create a secure space with a high level of trust, with an Information Technology and Solutions Usage policy that states the rules that each user must adhere to when using Sanofi systems.
- We prevent security events through specific procedures as well as physical, logical, organizational, and technical measures and dedicated programs to address insider-risk and external threats.
- We actively detect and manage security and privacy events such as cyberattacks, personal data breaches and data subject rights requests, ensuring relevant parties are informed and supported.
- We ensure each project involving personal data applies privacy-by-design and transparency principles through a step-by-step compliance roadmap.
- We conduct due diligence and active monitoring to help ensure Sanofi only works with reliable business partners when transferring personal data inside or outside the company while ensuring that adequate contractual measures are implemented to safeguard all transfers.

- We appoint a network of privacy officers and champions across Sanofi to provide practical expertise and support where and when it matters and to coordinate with our stakeholders.
- We increase general awareness through education and communication to reinforce our culture of privacy and information protection, making us more resilient to security threats.



Commercialization of Products and Services

Sanofi is committed to the sustainable and long-term success of our company aligned with our strategy. In order to uphold our purpose and ambition, we work with all stakeholders to help ensure our commercialization approach promotes patient and societal welfare, complies with laws and regulations, and operates ethically and with integrity.

We develop innovative products and services that help to prevent, diagnose, and treat diseases, thus improving people's lives. Across the entire product lifecycle, we are committed to high ethical standards, earning patients' and stakeholders' trust. Chasing the miracles of science to improve people's lives requires a life sciences ecosystem that rewards innovation and ensures that all patients who need our products and services have access to them. We are committed to bringing forward new products and services with a sense of urgency and continuously improving those products and services as well as our business processes.

How we Maximize *Opportunities*

- By pursuing a commercialization approach that drives vital resources towards meeting underserved health needs, improving research and development, strengthening supply chain resilience, and expanding access for current and future patient welfare.
- By working with diverse stakeholders in order to commercialize the very best products and services possible, so that we maximize benefits for patients.

How we Minimize *Risks*

- We take a commercial approach for new products which is rooted in our *Global Access and Pricing Principles*, which take into account four criteria:
  - overall added value of the products
  - availability or anticipated availability of similar treatments
  - ability of countries to afford new medicines
  - unique factors specific to the medicine or vaccine at the time of launch
- We strive for rapid, broad and equitable access to our products and services, regardless of an individual's ability to pay.
- We are transparent in our commercialization approach, including in such areas as the information we provide about our products and the disease states they impact, the data we collect and our product supply.
- We promote our products and services ethically, with integrity and in compliance with applicable laws and regulations. We design communications about our products and services to be accurate, balanced, and not misleading.



Engaging Business Partners

At Sanofi, we engage with a variety of business partners that we expect to uphold the highest ethical standards.

Our engagement with business partners including contractors, suppliers, direct customers, third-party sales and marketing intermediaries, strategic alliances and joint ventures is rooted in trust and is crucial to our work, enabling opportunities for Sanofi to achieve its purpose. It can also present a variety of risks to our operations, finances, and reputation, particularly when a business partner does not adhere to Sanofi's Code of Conduct.

How we Maximize *Opportunities*

- By only engaging with suppliers who adhere to our Code of Conduct, we strengthen our performance, mitigate potential disruptions, and foster an ethical health ecosystem that benefits patients.
- By supporting Sanofi's employees so they can confidently collaborate with our business partners with an understanding of shared values and standards of conduct.
- By fostering the success of small and medium-sized business partners who share our values and standards of conduct, supporting their growth alongside Sanofi.
- By embracing business partners that are as diverse as the patients and communities we serve, fostering an equitable and inclusive health ecosystem that supports Sanofi's growth and creativity.
- By coordinating with our industry peers and trade associations to strengthen ethical principles among shared business partners, we foster higher standards across our business sector.

How we Minimize *Risks*

- We engage with business partners based on objective criteria, including demonstrated competence and a record of integrity consistent with our Code of Conduct, while ensuring fair and non-discriminatory procurement practices.
- Prior to their selection, we undertake risk-based due diligence on our business partners.
- We expect all business partners to comply with all applicable laws and regulations and to adhere to Sanofi's Code of Conduct, including maintaining appropriate policies and procedures for their partnership role with Sanofi. In addition, we expect our suppliers to adhere to our *Supplier Code of Conduct*.
- We utilize controls that include regular monitoring, training, auditing, and other assessments to help detect, prevent, and remediate actual or potential non-compliant activities by our business partners.
- We communicate to our business partners our requirements, which we expect them to adhere to.
- We undertake cross-functional collaboration throughout Sanofi in the lifecycle management of our business partners.
- We enable our business partners, when faced with a potential non-compliant situation in connection with Sanofi business, to report it via the Speak-Up Helpline.
- We comply with applicable import, export controls laws and regulations that govern the export or transfer of certain products, materials, technology or software, as well trade sanctions laws that restrict dealings with certain markets, entities, or individuals.



Competing Freely and Fairly

Sanofi strives to deliver better outcomes for patients, communities, and stakeholders by providing groundbreaking therapies at the right time and for the right reasons. We support a level playing field in which companies freely and fairly chase the miracles of science without undue advantage.

Sanofi supports laws promoting fair competition and trade practice, as well as a vital ecosystem of innovation. We comply with all these laws wherever we do business and never attain competitive advantage through unethical or illegal business practices. This includes our commitment to never engage or appear to engage in the disparaging of our competitors, the imposition of restrictions on suppliers or customers, or an abuse of a dominant position in the market through improper agreements or any sort of collusion with competitors.

How we Maximize *Opportunities*

- By competing freely and fairly, Sanofi upholds innovation, drives quality, and expands choice for patients, improving health outcomes and meeting the expectations of our stakeholders and society as a whole.
- By supporting and advocating for a level playing field, Sanofi helps the best treatments reach the patients who need them while supporting the sustainability of our industry.
- By advocating for and protecting intellectual property rights that are vital to upholding an ecosystem that rewards investment in innovation. Sanofi also recognizes that any dominant market position that results from such rights be respected by healthcare regulators through facilitating patient access.
- By partnering with diverse stakeholders, as well as our trade association partners and conference organizers to uphold free and fair competition.

How we Minimize *Risks*

- We rely on a strong network of experts around the world to ensure compliance with all laws and regulations upholding free and fair competition, and apply our ethical principles where laws may fall short to support a level playing field.
- We prohibit our employees and business partners from pursuing activities with our competitors, suppliers, or customers that would result in Sanofi gaining an undue advantage.
- We are committed to complying with the antitrust and competition laws of all countries in which we operate.
- We ensure that our participation in collective initiatives with competitors is consistent with competition laws and complies with our *principles* on this topic.



Fighting Bribery and Corruption

Sanofi does not tolerate any form of bribery or abuse of power for personal gain, both among our employees and business partners, as well as among stakeholders involved in chasing the miracles of science to improve patients' lives.

Such acts of bribery and corruption include providing (or receiving) anything of value to (or from) any person for the purpose of influencing any behavior or decision, particularly healthcare professionals, patient organizations, government officials, and state organizations. Corruption harms patients, erodes trust in healthcare, and can curtail investment in medicines. Corruption also fosters health inequities and deters economic development, human rights, and environmental sustainability. Our intolerance for any kind of corruption drives Sanofi to cultivate a robust culture of integrity. It also motivates us to fight corruption outside our organization wherever it may hinder our purpose.

How we Maximize *Opportunities*

- By preventing bribery and corruption, both within Sanofi and across all those that touch our sector, this enables the company to realize its purpose and ensure the sustainability of our industry by upholding innovation, driving high quality of products and services, and safeguarding public and private resources to improve health outcomes and meet society's expectations.
- *By demonstrating our trustworthiness to patients and our stakeholders through our commitment to preventing bribery and corruption internally and our determination to fight it externally.*
- By empowering our people to proactively identify, assess, and mitigate potential bribery and corruption risks and prioritize our resources to manage them.
- By engaging in joint or multi-party initiatives across the biopharmaceutical industry as well as in partnership with patients, healthcare professionals, civil society, and multi-lateral organizations to fight corruption and strengthen the resilience of health systems.

How we Minimize *Risks*

- We prohibit our employees or business partners from engaging in any act or perceived act of bribery and corruption. We require them to report any potential act of bribery and corruption while routinely training our employees to help identify and prevent such acts.
- We prohibit facilitating payments, even when legally permitted.
- We prohibit employees giving or receiving gifts from third parties.
- We safeguard processes for and eliminate barriers to an employee or business partner's ability to raise and report bribery or corruption concerns confidentially with protections against retaliation.
- We support a robust ethics and compliance function that can execute its responsibilities independently and has direct access to executive leadership.
- We utilize our experienced experts around the world to ensure adherence to all anti-bribery and anti-corruption laws and regulations, as well as to apply our ethical principles where laws may fall short of upholding the highest standards of business integrity.
- We conduct risk-based anti-bribery due diligence on our business partners, including suppliers, customers, and third-party sales and marketing intermediaries, before engaging them and periodically during our partnering. Any potential issue raised through this monitoring is reviewed and assessed in order to evaluate the need for a risk mitigation plan, including termination if required.



Protecting the Environment

Climate change is one of the most pressing challenges of our time. Sanofi's immediate and long-term success requires decisive leadership to *protect our planet*, natural resources and biodiversity that humanity depends on.

At Sanofi, our dedication to improving people's lives goes beyond innovations in healthcare. *We believe that we need less, better, and greener resources along the life cycle of medicines and vaccines.* As a global organization we also bear great responsibility to take actions that mitigate the consequences of climate change on human health today and for future generations, including food and water shortages, reduced air quality, and conditions that support the spread of diseases and allergies. These actions include minimizing the environmental impact of our products and activities as well as supporting others in similar efforts. We are also strengthening our own resilience in the face of environmental changes.

How we Maximize *Opportunities*

- By aligning decisions with the environmental expectations of the world's patients, our employees and stakeholders, including investors and governments.
- By reducing our emissions across our entire value chain towards net zero emissions by 2045 with an intermediate carbon neutrality 2030.
- By limiting our environmental footprint and adopting circular solutions that conserve energy and reduce waste, we support the conservation of resources and contribute to biodiversity protection.
- By improving the environmental profile of our products, delivering eco-innovative products and by fostering a sustainable use of medicines
- By addressing the negative impact of climate change on human health, supporting the prevention of premature death; air pollution-related illnesses such as respiratory infections, heart diseases, and lung cancers; consumption or contact with contaminated water that causes gastrointestinal illness and allergies; and climate-sensitive health outcomes such as extreme heat events, floods, droughts, and fires.
- By engaging supporting and developing employees and business partners in our environmental ambitions.
- By assessing climate change-related risks and opportunities for our business, to develop robust strategies unlocking transition potentialities.
- By partnering with external groups to develop new solutions and methodologies for the environment and support our suppliers (e.g Pharmaceutical Supply Chain Initiative).

How we Minimize *Risks*

- We prioritize environmentally conscious decision-making at all levels of the organization and incentivize behavior consciously choosing to protect the environment.
- We prevent risks to the environment through the implementation of environmental policies and practices that reflect our commitments for the planet.
- We reduce reputational risk and loss of stakeholder confidence by transparently disclosing externally our performance and progress toward our objectives, as an example through CDP disclosure.
- We prioritize environmental protection in the selection of our business partners.
- We ask our suppliers to endorse our supplier code of conduct and provide them ESG guidance (available in *Sanofi suppliers portal*).
- We assess climate change-related risks on our operations and value chain, to develop robust mitigation strategies.



Committing to Society

At Sanofi, we believe in better access to quality medicines and vaccines, particularly for the underserved population and vulnerable communities across all geographies, to foster economic growth, social inclusion, and environmental protection. **Our approach to social impact is to strengthen, reaffirm, and amplify our commitment to society and the communities we serve. Our social impact is enabled by three efforts:**

- Corporate Social Responsibility, a company-wide strategy aligned to our long-term business strategy, designed to make a difference that can be scaled and delivering positive impact that can be sustained over time. Every part of the organization has a role to play and makes a contribution with flagship initiatives spread across the company's value chain, from R&D to manufacturing to commercial operations
- Global Health Unit (GHU), a non-profit enterprise that makes essential Sanofi products available in low- and middle-income countries as well as supports local entrepreneurs scale up healthcare capacity; and
- Foundation S – The Sanofi Collective, our "Think and Do Tank" philanthropic arm that improves the lives of vulnerable populations by catalyzing community–based solutions around childhood cancer, climate action and health resilience, neglected tropical diseases, and responding to humanitarian crises by donating medicines and offering emergency aid.

How we Maximize *Opportunities*

- By recognizing that our purpose includes a fundamental commitment to all our stakeholders to improve people's health, to deliver value to customers, to invest in our employees, to deal fairly and ethically with our suppliers, to support the communities in which we work, and to generate long-term value for shareholders.
- By increasing access to and affordability of our products and services, including through patient programs and other initiatives, we strengthen communities and their healthcare systems, particularly for the most vulnerable.
- By proactively acting for the most vulnerable and underrepresented, we advance solutions that otherwise might not have been possible, including research for unmet needs.
- By empowering our employees to perform local volunteer activities, we strengthen communities where we both live and work.
- By signing up to the United Nations Global Compact, we are committed to upholding its principles for sustainable and socially responsible practices, publicly reporting on our implementation efforts since 2003.

How we Minimize *Risks*

- We ensure our commitments to society deliver tangible impact with proper measurement and public reporting.
- We value the trust that society places in Sanofi and pursue decisions at every level within our organization that aim to earn and preserve that trust, including the embedding of corporate social responsibility into our leaders' career development pathway.
- We listen to the patients, our employees, business partners, and stakeholders that comprise the communities where we operate to support improved and ethical decision-making.
- We recognize that some people are more vulnerable than others and that Sanofi has a responsibility to understand and address their needs.
- We support patient health across the world's diverse communities and do not discriminate against a community based on geographic, social, political or other factors.
- We do not undertake decisions to weaken our long-term development and our ability to deliver on our commitments sustainably.



Utilizing Social Media and Communicating Responsibly

At Sanofi, we recognize the importance of social media in connecting people and informing our stakeholders on various aspects of our company, including our science, areas of research, diseases and patients. We are committed to ensuring responsible and effective communications that reflect our core values.

Sanofi employees should always be mindful that they are representing Sanofi. Their personal social media activity, even when not directly work-related, can have consequences for the company.

When engaging in social media, whether for personal, professional or corporate use, Sanofi employees should always follow the principles below:

- ***Accuracy:*** Ensure all shared information is correct and verified.
- ***Authenticity:*** Share genuine and truthful content.
- ***Awareness:*** Stay informed and vigilant about who you interact with on social media as it could involve impersonation or fake profiles. Verify identities and be cautious of potential fraud.
- ***Compliance:*** Follow industry standards and applicable laws and regulations, including local policies related to promotional practices.
- ***Confidentiality:*** Protect sensitive, confidential and/or proprietary information.
- ***Privacy:*** Respect Global Privacy Governance Framework that ensures optimal protection of personal data.
- ***Respect***: Behave respectfully towards others when interacting on social media. Remember, your social media activity can reflect on Sanofi, even when using a personal account.
- ***Transparency:*** Disclose your affiliation with Sanofi when interacting for social media for professional and corporate use.

Our commitment to responsible communication extends across all Sanofi-affiliated social media platforms, including official company channels, accounts providing scientific information related to our therapeutic areas, and accounts of company leaders and spokespersons.

How we Maximize *Opportunities*

- By sharing values, commitments, activities, and scientific information with individuals and stakeholders around the world, Sanofi builds awareness of our purpose, inspires collaboration that drives innovation, and shares accurate, swift, and targeted information to those in need while maintaining authenticity and transparency.
- By learning from and taking stock of what we receive from individuals and stakeholders via social media and digital platforms, including recommendations to strengthen Sanofi as well as improved capturing and reporting of product complaints and adverse events ensuring compliance and accuracy.
- By promoting authenticity and respect when empowering patients and those with valuable experience or expertise regarding Sanofi's products and services to share their stories in a manner that supports human health.
- By empowering our employees and business partners to engage with, learn from, and contribute to their communities responsibly and compliantly, while upholding principles of confidentiality, privacy, and respect.

How we Minimize *Risks*

- Sanofi employees must comply with pharmacovigilance and safety obligations. While we actively monitor pharmacovigilance in our corporate use of social media, risks still exist, particularly in personal and professional contexts. It is the duty of our employees to report any adverse events or product technical complaints to adhere with worldwide safety requirements.
- When using social media, our employees or business partners must not share or comment on confidential information. We expect them to use good judgement and always reflect Sanofi's values including confidentiality, authenticity, and respect.
- We are committed to respecting user privacy, and being transparent about our use of personal data.
- We ensure our stakeholders can clearly identify information issued by Sanofi, especially when published by a business partner on our behalf, upholding transparency and authenticity.



Preserving Benefit-Risk Balance

Sanofi is committed to transparent communication about its products, while ensuring information about the efficacy, safety profile and services are routinely updated.

The safety of patients is fundamental to our purpose of improving people's lives. This starts with protecting those who participate in the clinical trials we sponsor and extends to product safety throughout our manufacturing operations and quality of supply. We guarantee a positive benefit-risk balance of our products. In addition, we safeguard patient privacy, uphold the integrity of patient data, provide information to ensure safe and effective use of our products and services, and continuously monitor and report adverse events. As Sanofi's products and services evolve and bring even greater opportunities to improve patient health, we will remain steadfast in our commitment to the preservation of patient safety in close collaboration with our stakeholders.

How we Maximize *Opportunities*

- By prioritizing patient safety, Sanofi improves health outcomes, enhances patient confidence in healthcare, and earns vital trust with stakeholders.
- By preserving a positive benefit-risk balance for all our products throughout their product lifecycle, Sanofi strengthens its patient-centered approach and is better prepared to address future safety needs, including in promising areas such as gene editing and cell therapy.

How we Minimize *Risks*

- We conform our products and services to stringent standards of quality, safety, efficacy, and risk/benefit analysis, as determined by regulatory authorities wherever we operate.
- We secure evidence that our products and services have acceptable safety profiles before they are tested on human research participants.
- We provide up-to-date relevant safety and efficacy information to support the decisions of government authorities, investigating sites, and ethics committees in approving our clinical research
- We transparently communicate and routinely update information about the safety and efficacy of our products and services throughout their lifecycle.
- We support the education of the scientific and medical community by providing accurate, timely, and balanced information about our products and services to ensure their proper use.
- We ensure that responses to medical information requests from patients and healthcare professionals are timely, truthful, evidence-based and scientifically balanced to support the informed and appropriate use of Sanofi's products.
- We protect patient privacy and inform patients about how we use their personal data, all in full compliance with applicable laws.
- We swiftly report adverse events or adverse reactions to Sanofi's products to regulatory authorities in accordance with our pharmacovigilance requirements.



Accelerating Research and Development with Scientific Integrity

At Sanofi, we are committed to conducting our research and development activities with integrity and providing relevant information transparently to facilitate the proper use of our products.

Sanofi seeks to chase the miracles of science to improve people's lives by prioritizing scientific integrity in all aspects of our work. This means conducting our research and development with the right motivations, in a manner that upholds our ethical principles, and in accordance with applicable regulatory, medical and scientific standards. Such an approach enhances our capabilities and builds trust between Sanofi and our stakeholders, positioning us to drive sustainable innovation.

How we Maximize *Opportunities*

- By embracing the highest standards of scientific integrity in our research, Sanofi attracts and maintains talent and partners that allow us to bring forward new products and services that save lives, underpin our purpose, and fuel our sustained growth.
- By committing to publicly disclosing information on our clinical trials and their results, including information written in lay language, Sanofi builds trust with patients, healthcare professionals, healthcare providers, and the scientific community.
- By utilizing Sanofi's Bioethics Committee, when needed, with additional advice from external Advisory Bioethics experts, Sanofi helps to ensure our scientific and medical activities are conducted ethically and with integrity.
- By fostering scientific and technological development, partnership, cross-fertilization and collaboration, Sanofi proactively works towards the phasing in of new approach methodologies that support the replacement, reduction, and refinement of the use of animals wherever possible.

How we Minimize *Risks*

- *We conduct* our research with a firm commitment to preserving patients' rights and adhering to the highest ethical standards, guided by major ethical frameworks such as the Declaration of Helsinki, the Council for International Organizations of Medical Sciences (CIOMS) guidelines, and the recommendations of the Belmont Report. Our practices are in strict compliance with all applicable laws regulations, and ethical guidelines, including Good Research Practices (GRP), Good Laboratory Practices (GLP), and Good Clinical Practices (GCP).
- We employ a patient-centered informed consent process where prospective clinical trial participants and/or their caregivers understand potential safety risks prior to deciding to voluntarily participate.
- We conduct our research with the intent to develop scientific knowledge that will benefit patients while advancing science and medicine.
- We conduct internal reviews of any scientific information we deliver to the scientific community, healthcare providers, and to patients, to guarantee compliance with good scientific information practices.
- We do not make false or misleading statements nor disseminate scientific information that inaccurately estimates the real value of the product or service and its role in helping the patient.
- We ensure *transparency* and accountability in the presentation of research and *publication of study results.*
- We do not undertake research or clinical trials as an inappropriate inducement for past or future sales.
- We are aware of the ethical issues raised by the use of animals and are committed to abide by a set of guiding *principles for the protection of animals*.

- We are committed to using animals only when there is a clear expectation that the results will contribute to the protection and/or the improvement of human health.
- We are committed to the welfare of animals and the protection of the environment in our research and development.
- We routinely review and update *Sanofi's Bioethics Framework* to guarantee the integrity of all our scientific and research activities.



Interacting with Stakeholders

Sanofi is committed to maintaining patient focus as well as acting with integrity, respect, legitimate intent, transparency, and accountability when interacting with stakeholders.

To fulfill Sanofi's purpose, we must interact and partner with diverse stakeholders in the health ecosystem in numerous ways. These stakeholders include patients and patient organizations, caregivers, healthcare professionals, government officials, and scientific and technological organizations, among others. These exchanges are the lifeblood of biopharmaceutical innovation and patient access to our products and services. To advance patient care, our interactions with each stakeholder must align with Sanofi's ethical principles. This includes sharing a patient and consumer focus and commitment to integrity, recognizing conflicts of interest, respecting mutual independence, embracing transparency, and holding ourselves accountable for the results of our interactions. Sanofi is also committed to productive public discourse and responsible political engagement with stakeholders on issues tied to our mission.

How we Maximize *Opportunities*

- By fostering interactions with stakeholders that are based on trust and ethical principles, and by recognizing potential conflicts of interest, we strengthen the reliability of Sanofi's performance as well as the sustainability of the health ecosystem in which we operate.
- By interacting with patients, patient organizations and caregivers, we better understand patient needs as well as the impact of our products and services, utilizing those learnings to drive continuous improvement in our work.
- By respectfully enabling connections among patients and caregivers to share their experiences and needs, we advance research and improve people's lives.
- By providing responsible scientific, educational, clinical, product, and policy information to diverse stakeholders, including patients, caregivers, healthcare professionals, and authorities, we improve patient care and support a level playing field for the innovative products and services we provide.
- By utilizing appropriate marketing for our products and services, we help maximize benefits for health systems and patients.

How we Minimize *Risks*

- We commit to proactively detecting, avoiding and/or mitigating conflicts of interest that may emerge during Sanofi's interactions with stakeholders.
- We observe clear ethical boundaries when interacting with patients and caregivers, individually and as part of patient organizations, respecting their autonomy and the voluntary nature of these interactions.
- We ensure our financial and in-kind support for patient organizations is transparent and reflected in written agreements.
- We interact with healthcare professionals in a transparent and professional manner, consistent with laws and regulations, and without offering or providing anything that could
    - (a) inappropriately influence prescribing practices or
    - (b) encourage inappropriate use of our products or services.
- We inform healthcare professionals about the benefits and risks of our products and services to help advance appropriate prescribing and use by patients.
- We organize or sponsor symposia, congresses, informational presentations, and other events for healthcare professionals and patient advocacy groups for the purpose of accurately informing them about scientific research as well as our products and services.
- We ensure there is an appropriate bona fide business purpose for any engagement of an external expert stakeholder for consulting and/or speaking services.
- We seek recommendations and advice from external experts, for example at advisory boards, and ensure they are not abused to inappropriately influence those experts.
- We fully document the nature of each donation made by Sanofi and require from the recipient full disclosure of the donation's appropriate purpose.

- We ensure that access programs are compliant with all applicable laws, regulations and codes, including those pertaining to pharmacovigilance, pricing, patient data protection, and antitrust, as well as with high integrity standards related to interactions with business partners and other stakeholders.
- We observe clear and ethical boundaries when interacting with government officials and when undertaking responsible political engagement, providing accurate and balanced information, and prohibiting inappropriate influence in public policy-setting and other decision-making processes.
- We do not engage in any activities with stakeholders that are or could be perceived as promotional prior to gaining marketing and other necessary authorizations for our products or services.
- We adhere to leading practices on stakeholder interactions reflected in the global, regional or local industry Codes, such as IFPMA Code of Practice and Notes for Guidance.



Maintaining Financial Integrity

We are committed to the integrity of Sanofi's financial activities to realize our purpose, ensuring our role as a trusted partner in serving public health needs and expanding health innovation. Financial integrity is vital to protect the patients we serve as well as our employees, stakeholders, and the financial markets.

Therefore, Sanofi's financial records are designed to ensure that we do not mislead investors, legislators, authorities and the public about financial aspects of our company.

As a publicly listed company, Sanofi has a responsibility to generate and maintain accurate books, records, and accounts as well as to file accurate financial statements that embrace transparency through the public disclosure of material information. In addition to robust internal controls and procedures for financial reporting that foster conformity with generally accepted accounting principles, our financial integrity extends to a strict prohibition on insider trading and money laundering. Sanofi complies with governing tax rules, restrictions on denied or restricted parties, and inquiries from internal and external auditors.

How we Maximize *Opportunities*

- By upholding trust and confidence in our business from the patients we serve as well as our employees, stakeholders, and the financial markets.
- By embracing transparency of accurate material information through public disclosure.
- By positioning ourselves as a preferred partner in financing and contracting activities that are foundational to our innovation and delivery of products and services for patients.
- By making better decisions based on complete, accurate, and timely information.
- By enabling the deployment of financial resources for their intended and approved purpose, strengthening our agility to meet business objectives and directing capital where it is needed.
- By positioning Sanofi as a leader in strengthening links between our world's sustainability and our financial performance.

How we Minimize *Risks*

- We maintain robust procedures to generate and maintain complete, accurate, and timely books, records, and accounts that reflect our activities.
- We maintain robust controls over financial reporting that enable Sanofi to conform to generally accepted accounting principles.
- We maintain confidentiality of material information prior to public disclosure and disclose material non-public information only to persons who need to know this information.
- We prohibit trading based on confidential information for personal profit, as well as "tipping" others so they may do so.
- We have strong policies that do not tolerate any bribe or other favor to influence a decision of another person or entity that may impact Sanofi's business.
- We provide complete, accurate, and timely responses to internal and external auditors who evaluate our financial statements.
- We conduct reviews to comply with restrictions on denied or restricted parties.
- We uphold rules and programs to prevent and combat money laundering.
- We fulfill our role as a responsible corporate organization by paying taxes in the jurisdictions in which we operate.
- We adhere to a formal contracting process in order to maintain the rights we have granted and obligations we have undertaken with persons or entities outside Sanofi.



Sustaining Good Operating Practices

At Sanofi, *we believe that excellence in manufacturing medicines contributes to better health systems and stronger economies.* We manufacture and distribute products of the highest quality worldwide to improve people's lives.

At Sanofi, we are proud of our products, and we value patient and stakeholder trust in them. To earn and sustain that trust, we manufacture and package our products according to the highest quality standards. We rely on our dedicated people who work in our factories and on cutting-edge technologies to ensure product quality throughout its lifecycle. We seek continuous improvement in our manufacturing standards and ensure alignment with all applicable regulatory requirements and current good manufacturing practices. We work closely with worldwide health authorities to maintain all necessary licenses and certificates to operate our production facilities. We regularly audit our industrial sites, suppliers, and other business partners to ensure the highest quality of our products and their components.

We foster the resilience of our people and teams to ensure that the possible disruption of our activities does not prevent our patients to access the products they need.

We apply Good Distribution Practices to ensure that our products are transported under conditions guaranteeing their security and quality.

How we Maximize *Opportunities*

- By cultivating a culture of quality to pursue continuous improvement and innovation, embrace the benefits of new technologies and optimize risk taking throughout our organization.
- By adhering to the highest quality standards in our operating practices, we help ensure the best medicines reach those who need them while safeguarding patient and stakeholder trust in our medicines.
- By routinely implementing proven technologies into our operating practices that allow Sanofi to offer new and best-in-class medicines.
- By leveraging digital solutions to improve our manufacturing, packaging, supply operations.
- By enhancing our methods to produce active ingredients.
- By maintaining a strong supply chain to ensure access to Sanofi medicines worldwide and on time.

How we Minimize *Risks*

- We systematically identify and manage health, safety, and environmental risks over the entire value chain of our products and services.
- We manufacture high-quality products that meet all regulatory requirements and pursue quality beyond compliance with regulation in both our products and processes.
- We protect patient safety by identifying, assessing, and managing any product-related risks in a timely manner.
- We are highly committed to ensure Quality in researching, developing, and providing safe and efficacious products for our patients.
- We closely engage with regulatory authorities to ensure compliance with their requirements.
- We ensure oversight of our supply chain and product deliveries and transport medicines under conditions guaranteeing their security and quality.
- We perform regular audits of Sanofi industrial sites, suppliers, and other business partners to ensure that only products that meet our high-quality standards are made and delivered.
- We deploy a business continuity and a crisis management program to respond to crisis in a consistent manner and resume critical operations.



Transforming Medicine through Digital Health

At Sanofi, we believe in emerging science and new technologies are creating new opportunities to transform the practice of medicine.

Sanofi is leveraging technology while creating a safe and ethics-by-design environment for digital solutions.

Our ambition is to be the world's leading digital healthcare platform. Using digital applications, portals, Artificial Intelligence (AI), digital biomarkers, data analytics and evolutive industrial facilities, Sanofi is creating a more agile, integrated and highly collaborative digital environment to boost performance across the entire organization. This includes digital innovation for accelerated approaches to research and development, strengthened digital engagement with healthcare professionals, and specific digital patient support solutions and robust digital tools.

How we Maximize *Opportunities*

- By accelerating our digital transformation and ways of working to be the leading digital healthcare platform, we aim to develop and deliver our products faster, to leverage data insights and engage in full digital experiences.
- By launching and refining our *Digital Accelerator*, we have an agile delivery platform to build strategic digital products such as: AI-based omnichannel engines, healthcare professional portals, digital commerce platforms, and other technologies to drive our transformation.
- By launching state-of-the-art, scalable digital applications in our research and development programs, we increase our understanding of diseases, shorten the diagnostic journey, and strengthen patient care.
- By establishing a global strategy for AI and data democratization, and by expanding our analytics capabilities through machine-learning platforms and digital biomarkers identification, we are:
  - bettering the understanding of diseases to develop new medicines,
  - accelerating, optimizing and diversifying patient recruitment for our clinical studies.
- By harnessing AI's potential responsibly, we drive innovation at-scale both internally across our organization, and externally to better serve our stakeholders and our patients in a manner that prioritizes human rights such as privacy and non-discrimination, along with principles of transparency, safety, *eco-responsibility* , and accountability.
- By launching a global digitalization strategy for our industrial manufacturing operations, we are transforming our sites into highly efficient and sustainable "Factories of the Future" where objects, infrastructure and people are interconnected, enhancing the reliability of production and customer service, and catalyzing the move towards carbon neutral production.

How we Minimize *Risks*

- We implement and routinely enhance our Digital Control Framework, which includes all controls our digital healthcare solutions have to comply with.
- We utilize a structured, end-to-end framework for digital solutions, providing a common and transparent view of digital governance and operational processes that reinforces ethics-by-design approaches.
- We take on accountability from design through deployment and use of AI systems, including those from third parties, by adhering to a comprehensive thoughtful risk-taking framework that is responsive to the changing AI regulatory landscape, and enforces proportionate governance and technology controls to manage *AI innovation responsibly*.
- We ensure close coordination with Sanofi's data privacy, IT security and cybersecurity teams to ensure personal data are used in accordance with all applicable laws.

- By implementing an ethics-by-design approach into our digital transformation, we strengthen our long-term resilience and foster a culture of transparency, fairness, trust and accountability, quality, and non-discrimination across the global ecosystem of health innovation.

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Message from Julien Durand: Christel Sasso /CAPA PICTURES

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Code of *Conduct*

Update: November 2024

www.codeofconduct.sanofi/EN
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