

# LOBBYING

**GRI Standards: 103 : Management approach  
415 : Public policy**

Lobbying practices can give rise to controversy, and at times may challenge public trust. We wanted to go beyond compliance with international codes and standards governing this activity, and in November 2013 Sanofi implemented its Global Policy on Lobbying which was updated in February 2018. Accordingly, only authorized Sanofi employees and hired Consultant Lobbyists may engage in discussions on Sanofi's behalf concerning legislation and rulemaking activity without prior, expressed, and written Sanofi approval. Per Sanofi Lobbying Policy, all Sanofi Authorized Employees and Consultant Lobbyists must ensure that:

1. They remain compliant with all applicable laws and regulations;
2. Lobbying must be done with the purpose of advancing Sanofi's interests;
3. They remain honest and transparent concerning whom, and for what, they are lobbying;
4. Provision of gifts, entertainment, or hospitality must be made in strict compliance with applicable anti-corruption laws and regulations, Sanofi policies, and regulations and other regulations and codes (e.g., internal policies of the lawmaker); and,
5. Any contract with a Consultant Lobbyist must include a detailed quotation of services, anti-bribery provisions, audit rights of Sanofi, and the Consultant Lobbyist's commitment to comply with local regulations.

The Organization for Economic Co-operation and Development (OECD) Principles for Transparency and Integrity in Lobbying were also used as a reference in developing our responsible Lobbying policy. The policy stipulates that Sanofi must perform lobbying with the highest ethical standards and commitment to the patient. In addition to compliance with Sanofi's Code of Ethics, and with the applicable lobbying and advocacy laws and regulations where Sanofi does business, the key principles of the policy include (but are not limited to): the quality of information circulated by Sanofi; support for initiatives that aim to increase transparency in public and business life; and only personnel who are registered lobbyists or have prior approval from Sanofi management can engage in lobbying on behalf of Sanofi.

For more information, see:

- [Sanofi's Code of Ethics in the download center;](#)
- [The OECD's ten principles](#)

## I. EUROPEAN UNION: TRANSPARENCY REGISTER

In 2009 Sanofi joined the European Union's Transparency Register, which provides European citizens with direct access to information about which organizations are engaged in activities aimed at influencing the European Union's decision-making process, as well as the resources invested in these activities.

Registrants are required to provide information about their lobbying and advocacy activities and sign the Transparency Register Code of Conduct.

Estimate of the Sanofi annual costs related to activities covered by the register for:

- the financial year 2018: €1,000,000 - €1,249,999
- the financial year 2017: €1,000,000 - €1,249,999
- the financial year 2016: €700,000-799,000, Genzyme: €400,000-500,000.

For more information, visit the [Transparency Register](#).

## II. UNITED STATES: DISCLOSURES

**2018 Sanofi US Lobbying Expenditures: \$4,680,000**

**2017 Sanofi US Lobbying Expenditures: \$4,500,000**

**2016 Sanofi US Lobbying Expenditures: \$3,749,000**

In compliance with the U.S. federal law, Sanofi discloses all expenditures related to federal lobbying on a quarterly basis. To access Sanofi's lobbying reports, please reference: <http://disclosures.house.gov/ld/ldsearch.aspx>.

**2018 Sanofi Memberships: \$27,829,879**

**2017 Sanofi Memberships: \$29,156,497**

**2016 Sanofi Memberships: \$27,048,969**

Sanofi retains membership in over 50 external groups representing various stakeholders in the healthcare sector and economy at large. These organizations include trade associations (representing both pharmaceutical manufacturers and manufacturers at large, respectively), think tanks, and local business groups. Many of the trade associations lobby on behalf of Sanofi.

**2018 Corporate Political Contributions: \$76,700**

**2017 Corporate Political Contributions: \$674,100**

**2016 Corporate Political Contributions: \$41,200**

A Sanofi corporate contribution consists of finances directly from the company. In the political arena, these contributions help foster dialogue with individual candidates seeking to champion our issues and groups of elected officials who understand our unique role in the healthcare sector (e.g., National Governors' Association). At the federal level, and in some states, corporate contributions are prohibited.

**2018 Sanofi US PAC Spend: \$512,350**

**2017 Sanofi US PAC Spend: \$756,500**

**2016 Sanofi US PAC Spend: \$692,400<sup>1</sup>**

The Sanofi US Employee's Political Action Committee (Sanofi US PAC) is a voluntary group of Sanofi employees with the mission to increase Sanofi's voice in the political arena. Sanofi US PAC supports federal and state candidates, on a nonpartisan basis, who champion Sanofi and its diverse portfolio. Additionally, Sanofi US PAC seeks to educate candidates not fully aware of Sanofi's portfolio but seeking to learn and subsequently champion our issues. Sanofi US PAC is governed by the PAC Board of Directors, a group of Sanofi employees covering a broad range of company functions and responsibilities. The Board decides which candidates to support, after incorporating important factors: positions on core industry issues and prevalence of Sanofi US employees or facilities in the state or district at hand.

To access Sanofi's federal contributions disclosures, please reference: <http://disclosures.house.gov/lc/lcsearch.aspx>.

## III. PUBLICATION OF EUROPEAN FINANCIAL CONTRIBUTIONS TO SECTOR ORGANIZATIONS

Below is a list of industry specific trade associations Sanofi adheres and/or contributes to in Europe:

- The **European Federation of Pharmaceutical Industries and Associations (EFPIA)**: gathers 33 European national pharmaceutical industry associations as well as 40 leading companies undertaking research, development and the manufacture in Europe of medicinal products for human use;
- The **European Generic medicine Association (EGA)**: European generic and biosimilar pharmaceutical industries;

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<sup>1</sup> Total includes Sanofi Pasteur and Genzyme PACs. These PACs were merged with Sanofi US Employees' PAC by the end of 2016.

- **European Biopharmaceutical Enterprises (EBE)**: European trade association that represents biopharmaceutical companies of all sizes operating in Europe;
- **EuropaBio**: European Association for Bio industries;
- **Les entreprises du médicament (LEEM)**: French Pharmaceutical Companies Association.

In line with our commitment to transparency, Sanofi publishes the following information about our financial contributions (all contributions and expenditure are rounded to the nearest 10,000 EUR, USD) to the industry specific trade associations.

Organization	Group contribution in 2016	Group contribution in 2017*	Group contribution in 2018
<b>European organizations</b>			
<b>EFPIA**</b>	Sanofi: €620,000 Genzyme: €202,000	Sanofi: €582,000	Sanofi : €619,000
<b>EFPIA/Vaccines Europe**</b>	Sanofi Pasteur: €133,000	Sanofi Pasteur: €133,000	Sanofi Pasteur: €133,000
<b>Medicines for Europe (formely EGA)</b>	€100,000	€88,000	-
<b>EBE</b>	Genzyme: €20,000	Sanofi: €24,000	Sanofi: €24,000
<b>EuropaBio</b>	Genzyme: €60,000	Sanofi: €100,000	Sanofi: €103,000
<b>French organization</b>			
<b>LEEM</b>	€2,150,000	€2,150,000	€2,150,000

\*As from 2017, Genzyme is part of Sanofi figures.

\*\* In accordance with the Transparency Register Compliance Guidelines, published June 23, 2011, full membership fees, contributions, and participation costs in trade or professional associations, think tanks, and special events organized by third parties should not be taken into account for those organizations that have voluntarily registered. Despite the fact that these organizations voluntarily registered, we agreed, for the sake of transparency, to disclose our contributions.