

Lobbying

GRI Standards:

103: Management approach

415: Public policy

EXECUTIVE SUMMARY

This factsheet presents Sanofi's activities in terms of policy influence.

TABLE OF CONTENTS

- 1. Background 3*
- 2. Global Trade Associations: Disclosures 4*
- 3. United States: Disclosures 4*
- 4. European Union: Transparency Register 5*
- 5. Financial contributions in European sector organizations and in key markets..... 6*
- Annex 1. Additional list of organizations Sanofi contributes to in key markets*

1. Background

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 internal Global Policy on Lobbying, which was updated in 2018 and in March 2024. 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:

- they remain compliant with all applicable laws and regulations;
- lobbying must be done with the purpose of advancing Sanofi's interests;
- they remain honest and transparent concerning whom, and for what, they are lobbying;
- they shall provide no gifts;
- 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
- 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. Our internal 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 Conduct, 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.

Sanofi lobbying activities and political engagements aim to promote the interest of our business and shareholder value, which are governed by robust internal procedures and standards and aligned with our public policy priorities that impact our business and our patients. Our lobbying activities are coordinated and driven by our employees working in Public or Government Affairs in the countries where we operate, with clear accountabilities to the executive level. Our lobbying activities are mainly focused on innovation, healthcare, access to healthcare, environment and climate change, and diversity, equity and inclusion.

Sanofi believes in the importance of the intersection between the environment and health (our full position is available in Sanofi.com). We believe that we need less, better, and greener resources along the lifecycle of medicines and vaccines. Sanofi has a positive track record in minimizing the impact of our activities and products on the environment, in line with our commitment to the Paris Agreements. We believe that innovation contributes to reducing environmental impact in our healthcare systems by decarbonizing the patient care pathway, while striving to develop medicines and addressing new healthcare challenges caused by rising environmental challenges.

Trade Association Memberships

Sanofi is involved in several industry and trade groups that represent the pharmaceutical sector and our business interests. Sanofi closely monitors our engagement with trade association through our representatives, who are authorized Sanofi employees or consultants. We have established clear accountability for key priority topics that are being driven by our executive-level representatives in trade association boards and committees.

We engage in topics that are relevant to our business and we recognize that these organizations can engage on a broader range of topics that may be beyond the priorities of our company. We understand that our participation as a member in these associations might mean that we may not always be aligned with the positions of the broader organization and/or its members. In case of any misalignments with our own position, Sanofi representatives who serve on boards and committees convey our concern as appropriate and offer solutions to address this accordingly.

For more information, see:

- [Sanofi's Code of Conduct in our Document Center](#)
- [The OECD's ten principles](#)

2. Global Trade Associations: Disclosures

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, or local currency) to the industry specific trade associations.

Below is a list of main industry specific associations that Sanofi adheres and/or contributes to at the Global level:

Organization	Sanofi's contributions in:	
	2022	2023
Business at OECD*		€ 20,000
Global Self-Care Federation	CHF 265,500	CHF 265,194
International Federation of Pharmaceutical Manufacturers and Associations, IFPMA	CHF 787,000	CHF 787,000
IFPMA AMR Industry Alliance	CHF 18,000	CHF 18,000
International Diabetes Federation*		€ 200,000
International Probiotics Association*		€ 40,580
Union for International Cancer Control	\$ 200,000	\$ 100,000

*As part of Sanofi's commitment to expand our transparency on lobbying, we have included this organization in the list. This is the first year we are reporting on these figures.

3. United States: Disclosures

2023 Sanofi US Lobbying Expenditures: \$5,380,000

2022 Sanofi US Lobbying Expenditures: \$4,770,000

2021 Sanofi US Lobbying Expenditures: \$4,580,000

2020 Sanofi US Lobbying Expenditures: \$4,610,000

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 the following [database](#).

2023 Sanofi Memberships: \$32,255,203

2022 Sanofi Memberships: \$28,453,132

2021 Sanofi Memberships: \$24,758,902

2020 Sanofi Memberships: \$30,820,601

Sanofi retains membership in over 150 external groups representing various stakeholders in the healthcare sector and economy at large (See Annex 1). 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.

2023 Corporate Political Contributions: \$56,500

2022 Corporate Political Contributions: \$83,250

2021 Corporate Political Contributions: \$10,000

2020 Corporate Political Contributions: \$99,933

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. At the federal level, and in some states, corporate contributions are prohibited.

2023 Sanofi US PAC Spend: \$362,100

2022 Sanofi US PAC Spend: \$337,800

2021 Sanofi US PAC Spend: \$254,625

2020 Sanofi US PAC Spend: \$368,000

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.

For more information, see [Sanofi's federal contributions disclosures](#).

4. 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 2023: €1,000,000 – €1,249,999;**
- **the financial year 2022: €1,000,000 – €1,249,999;**
- **the financial year 2021: €1,000,000 – €1,249,999;**
- **the financial year 2020: €1,000,000 – €1,249,999;**

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

5. Financial contributions in European sector organizations and in key markets

Below is a list of main industry specific trade associations that Sanofi adheres and/or contributes to at the European level*:

- **The European Federation of Pharmaceutical Industries and Associations (EFPIA):** gathers 36

European national pharmaceutical industry associations as well as 39 leading companies undertaking research, development and the manufacture in Europe of medicinal products for human use;

- **Vaccines Europe:** a specialized vaccines group within the European Federation of Pharmaceutical Industries and Associations (EFPIA);
- **EUCOPE:** European Confederation of Pharmaceutical Entrepreneurs;
- **AESGP:** Association of the European Self-Care Industry;
- **EuropaBio:** European Association for Bio-industries

Organization	Sanofi's contribution in:			
	2020	2021	2022	2023
EFPIA	€ 881,122	€ 877,674	€ 967,428	€ 979,364
EFPIA / Vaccines Europe	€ 149,000	€ 166,741	€ 183,415	€ 187,093
EUCOPE		€ 33,000	€ 18,000	€ 18,000
AESGP	€ 70,000	€ 80,000	€ 80,000	€ 82,400
EuropaBio	€ 111,000	€ 114,530	€ 114,530	
European Brands Association**				€ 12,405
Food Supplements Europe**				€ 21,320

*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 full contributions.

** First year of reporting

Below is a list of Sanofi's contributions made to trade associations in Key Markets that we adhere and/or contribute to and that conduct policy advocacy activities. Refer to Annex 1 for additional list of organizations:

Organization	Sanofi's contribution in:			
	2020	2021	2022	2023
Austria				
Total*				€ 229,453
Finland				
Pharma Industry Finland*				€ 55,728.19
France**				
Les Entreprises du Médicament	€ 2,150,000	€ 2,150,000	€ 2,150,000	€ 2,150,000
Other organizations*				€ 676,000
Germany				
Verband Forschender Arzneimittelhersteller	€ 1,165,000	€ 1,222,843.38	€ 1,350,505.78	€ 1,462,816.14
Italy				
Farmaindustria	€ 507,521	€ 461.115	€ 517,707	€ 552,388
Other organizations*				€ 42,913
Ireland				
Irish Pharmaceutical Healthcare Association*				€ 36,568
Japan				
Total*				JPY 44,971,677
The Netherlands				
Total*				€ 335,791
Norway				

Total*				NOK 1,212,496
Spain				
Farmaindustria	€ 533,895	€ 435,035.15	€ 428,913	€ 445,280
Other organizations*				€ 80,000
Sweden				
Läkemedelsindustriföreningen				SEK 1.538.691
Switzerland				
Total*				CHF 186,073.29
United Kingdom				
The Association of the British Pharmaceutical Industry, ABPI	£ 963,345.08	£ 706,450.94	£ 818,856	£ 827,188
Other organizations*				£ 84,598

*As part of Sanofi's commitment to expand our transparency on lobbying, we have included this organization in the list. This is the first year we are reporting on these figures. **Please refer to full figures on lobbying activities in France via the French Transparency Registry (HATVP)

Annex 1. Additional list of organizations Sanofi contributes to in key markets

Austria

- Society for Transplantation, Transfusion and Genetics, Autotransplant
- Chambre de Commerce Franco-Autrichienne, CCFA
- Forum der forschenden pharmazeutischen Industrie, FOPI
- Industriellenvereinigung (Federation of Austrian Industries), IV
- Pharma Marketing Club Austria, PMCA
- Österreichische Public Affairs Vereinigung (Austrian Public Affairs Association), ÖPAV
- Österreichische Verband der Impfstoffhersteller (Austrian Association of Vaccine Manufacturers), ÖVIH
- Pharmig Verband der pharmazeutischen Industrie Österreich
- Verein zur Förderung von Wissenschaft und Forschung (Association for the promotion of science and research), Vfwf
- Wirtschaftskammer Wien (Austrian Chamber of Commerce)
- Public Relation Verband Österreich (Public Relations Association Austria)
- Austrian Self-Care Association, IGEPHA
- Austrian Qualified Persons Association
- Middle European Society for Regulatory Affairs

France

- France Chimie
- NERES
- Association Française des Entreprises Privées
- G5 Santé
- France Biotech
- France Industrie
- Confrontation Europe
- Institut de l'Entreprise
- Union des Marques

Italy

- Federchimica
- Assobiotech

Japan

- Japan Pharmaceutical Manufacturing Association
- EFPIA – Japan
- Keidanren
- Japan Association of Vaccine Industry
- PhRMA Japan Vaccines Committee

The Netherlands

- Vereniging Innovatieve Geneesmiddelen
- Hollandbio

Norway

- Legemiddelindustrien
- Confederation of Norewegian Enterprise, NHO
- NHO Geneo

Spain

- Confederación Española de Organizaciones Empresariales (Spanish Confederation of Business Organizations) CEOE
- Asociación Española de laboratorios Huerfanos y Ultrahuérfanos, AELMHU
- Spanish Association of Biosimilars, BIOSIM
- Asociación Española Empresas Biotecnología (Spanish Bioindustry Association) AseBiO

Switzerland

- Interpharma
- ScienceIndustries

United Kingdom

- The European Medicines Group
- Ethical Medicines Industry Group
- BioIndustry Association

United States

- Adult Vaccine Access Coalition
- AIM Associated Industries of Massachusetts, Inc.
- Aimed Alliance
- Alliance for a Stronger FDA
- Alliance for Patient Access
- Alliance for Regenerative Medicine
- America's Physician Groups
- American Academy of Pediatrics
- American Academy of Physician Associates
- American College of Cardiology Foundation
- American College of Toxicology
- American Diabetes Association
- American Heart Association, Inc.
- American Immunization Registry Association
- American Medical Association Foundation
- American Medical Women's Association
- American Pharmacists Association
- American Society for Nephrology
- American Society for Transplantation and Cellular Therapy
- American Society for Consultant Pharmacists
- American Society for Transplantation
- AMGA
- AMGA Foundation Inc
- Arthritis Foundation Inc
- Asian Indian Chamber of Commerce
- Association of Corporate Citizenship Professionals
- Association of Diabetes Care & Education Specialists
- Association of Immunization Managers
- Association of Military Surgeons of the United States
- Association of Washington Business
- Bio Nebraska Life Sciences Association
- Biocom California
- Bioethics International
- BioFlorida, Inc.
- BIONJ INC
- Biotechnology Innovation Organization
- Boston College Center for Corporate Citizenship
- Boston College Trustees
- Business Council of Alabama
- California Life Sciences Association
- California Pharmacists Association
- Cambridge Chamber of Commerce
- Central Florida Health Care Coalition
- Chief Executives for Corporate Purpose dba CECP
- Chronic Disease Coalition
- Coalition Against Childhood Cancer
- Coalition of State Rheumatology Organizations
- Coalition to Stop Flu
- College Diabetes Network Inc
- Colorado BioScience Association
- Connecticut United for Research Excellence
- Controlled Release Society, Inc
- Council of New Jersey Grantmakers Inc
- Council of the Americas Inc.
- Critical Path Institute
- Crohn's & Colitis Foundation
- Dallas Fort Worth Business Group on Health
- Diabetes Leadership Council
- Diabetes Patient Advocacy Coalition
- DiabetesSisters
- Digital Therapeutics Alliance

- Disability:IN
- Diversity Alliance for Science, Inc.
- Endocrine Society
- Evidence for Healthcare Improvement
- Florida Chamber of Commerce, Inc.
- Foundation for the National Institutes of Health, Inc.
- Global Business Alliance
- Global Women's Innovation Network
- Greater Boston Chamber of Commerce
- Greater LV Chamber of Commerce
- Health and Environmental Health Institute
- Health Care Institute of NJ Inc.
- Healthcare Businesswomen's Association
- Healthcare Distribution Alliance
- HealthCareTN
- HUBZone Contractors National Council, Inc.
- Illinois Biotechnology Innovation Organization
- Illinois Manufacturer's Association
- Immunize.org
- Indiana Chamber of Commerce
- Industry Pharmacogenomics Working Group
- International Society for Medical Publication Professionals
- International Society for Pharmacoeconomics and Outcome Research
- Iowa Biotechnology Association
- JDRF International
- Kendall Square Association
- Kentucky Chamber of Commerce
- Leadership Council on Legal Diversity
- Life Science Cares Inc
- Life Sciences Pennsylvania
- Lupus Research Alliance
- Maryland Chamber of Commerce
- Massachusetts Biotechnology Council
- Massachusetts Institute of Technology
- MetroWest Chamber of Commerce
- Michigan Biosciences Industry Association
- Michigan Chamber of Commerce
- Midwest Business Group on Health
- Milken Institute
- Museum of Science
- National Alliance for Caregiving
- National Alopecia Areata Foundation
- National Association of ACOs
- National Association of Chain Drug Stores
- National Association of Country and City Health Officials
- National Association of Directors of Nursing Administration in Long Term Care
- National Association of Manufacturers
- National Association of Pediatric Nurse Practitioners
- National Black Caucus of State Legislators
- National Coalition for Infant Health
- National Committee for Quality Assurance
- National Comprehensive Cancer Network
- National Council of Negro Women
- National Foundation for Celiac Awareness (Beyond Celiac)
- National Foundation for Infectious Diseases
- National Governors Association
- National Health Council
- National Hispanic Health Foundation
- National Lt. Governors Association
- National Minority Quality Forum
- National Minority Supplier Development Council
- National Multiple Sclerosis Society

- National Organization of Black Elected Legislative Women
- National Quality Forum
- NaVOBA – National Veteran Owned Business Association
- NCSL Foundation for State Legislatures
- New Jersey Association of Health Plans
- New Jersey Health Care Quality Institute
- New York & New Jersey Minority Supplier Development Council
- Ohio Chamber of Commerce
- Oregon Bioscience Association
- Partnership for DSCSA Governance, Inc.
- Partnership to Advance Cardiovascular Health
- Patients Rising Now
- Peter Cohen Foundation
- Pharmaceutical Compliance Forum
- Pharmaceutical Research and Manufacturers of America
- Pocono Chamber of Commerce
- PQA, Inc
- Preventive Cardiovascular Nurses Association
- Rare Access Project Inc
- Renal Physicians Association
- Research!America
- Society of Toxicology
- Somerset County Business Partnership
- Somerset Health Care Foundation
- South Carolina Alliance of Health Plans
- State Access to Innovative Medicines Coalition
- Statewide Hispanic Chamber of Commerce of New Jersey
- Tanenbaum Center for Interreligious Understanding
- Technology Council of Maryland Inc
- Tennessee Chamber of Commerce & Industry
- Texas Association of Manufacturers
- Texas Healthcare and Bioscience Institute
- The 495/MetroWest Partnership
- The Antibody Society, Inc.
- The Brigham and Women’s Hospital, Inc.
- The Conference Board
- The Foundation for Post-Acute & Long-Term Care Medicine
- The Gerontological Society of America
- The Greater Scranton Chamber of Commerce
- The Kansas Chamber of Commerce & Industry
- The Massachusetts LGBT Chamber of Commerce, Inc.
- The Oklahoma State Chamber of Commerce and Associated Industries
- The Partnership for Quality Medical Donations
- The Ripon Society
- The Texas Association of Business
- Unity Consortium
- Virginia Bio
- Virginia Center for Health Innovation
- Waltham Chamber of Commerce
- WBEC Metro NY and Greater DMV Inc.
- WEConnect International, Inc
- Western Governors’ Foundation
- Wisconsin Collaborative for Healthcare Quality Inc
- Women in Government Foundation, Inc
- Women of Color in Pharma
- Women’s Business Enterprise National Council