



# *Lobbying*

**GRI Standards:**

2-23: Policy commitments

415: Public policy

## **EXECUTIVE SUMMARY**

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

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# 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 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:

- *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. 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 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

Below is a list of main industry specific trade associations that Sanofi adheres and/or contributed to at the Global level in 2022:

**International Federation of Pharmaceutical Manufacturers and Associations: CHF 750,000**

**IFPMA AMR Industry Alliance: CHF 18,000**

**Global Self-Care Federation: CHF 265,500**

## 3. United States: Disclosures

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

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

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

**2019 Sanofi US Lobbying Expenditures: \$5,117,000**

**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 the following [database](#).

**2022 Sanofi Memberships: \$28,453,132**

- > Pharmaceutical Research and Manufacturing Association: \$27,427,896
- > Biotechnology Innovation Organization: \$1,030,236

**2021 Sanofi Memberships: \$24,758,902**

**2020 Sanofi Memberships: \$30,820,601**

**2019 Sanofi Memberships: \$25,728,497**

**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.

**2022 Corporate Political Contributions: \$83,250**

**2021 Corporate Political Contributions: \$10,000**

**2020 Corporate Political Contributions: \$99,933**

**2019 Corporate Political Contributions: \$116,250**

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

**2022 Sanofi US PAC Spend: \$337,800**

**2021 Sanofi US PAC Spend: \$254,625**

**2020 Sanofi US PAC Spend: \$368,000**

**2019 Sanofi US PAC Spend: \$449,300**

**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.

*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 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;
- the financial year 2019: €1,000,000 – €1,249,999;
- 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](#).*

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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.

## 5. Financial contributions to European sector organizations

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

- **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;
- **Les entreprises du médicament (LEEM):** French Pharmaceutical Companies Association;
- **ABPI:** The Association of the British Pharmaceutical Industry;
- **Verband Forschender Arzneimittelhersteller (Vfa)** – German Association of Research-Based Pharmaceutical Companies;
- **Farmaindustria:** National Trade Association of the Spanish based pharmaceutical industry; and
- **Farindustria:** National Trade Association of the Italian based pharmaceutical industry.

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**
**Sanofi's Contributions in:**

	2016	2017	2018	2019	2020	2021	2022
<b>European Organizations</b>							
<b>EFPIA**</b>	Sanofi: €620,000 Genzyme: €202,000	€582,000	€619,000	€784,560	€881,122	€877,674	€967,428
<b>EFPIA / Vaccines Europe**</b>	Sanofi Pasteur: €133,000	€133,000	€133,000	€132,925	€149,000	€166.741	€183.415
<b>EUCOPE</b>	-	-	-	-	-	€33,000	€18,000
<b>AESGP</b>	€60,000	€60,000	€60,000	€70,000	€70,000	€80,000	€80,000
<b>EuropaBio</b>	Genzyme: €60,000	€100,000	€103,000	€104,599	€111,000	€114,530 €	€114,530
<b>French organization</b>							
<b>LEEM</b>	€2,150,000	€2,150,000	€2,150,000	€2,150,000	€2,150,000	€2,150,000	€2,150,000
<b>German Organization</b>							
<b>Vfa</b>	€997,000	€939,000	€975,000	€1,190,000	€1,165,000	€1,222,843.38	€1.350.505,78
<b>Italian Organization</b>							
<b>Farindustria</b>	€538,301	€526,306	€539,212	€480,439	€507,521	€461.115	€517.707,00
<b>Spanish Organization</b>							
<b>Farindustria</b>	€417,026	€425,890	€503,943	€708,079	€533,895	€435,035.15	€428,913
<b>UK Organization</b>							
<b>ABPI</b>	£952,800.10	£900,776.97	£987,030.35	£949,515.29	£963,345.08	£706,450.94	£818,856

\*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.