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Principles on anti- bribery and anti- corruption

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Contents

<i>1. Purpose</i>	3
<i>2. Sanofi's commitments to combating bribery and corruption</i>	4
2.1 Key Principles	4
2.2 Sanofi Anti-Corruption Program	5
2.2.1 Preventive Measures:	5
2.2.2 Detection Measures:	6
2.2.3 Remediation Measures:	6
<i>3. Main corruption risk areas and activities</i>	7
3.1 Transfer of values with healthcare communities	7
3.2 Gifts and invitations	9
3.3 Samples and other promotional items	11
3.4 Donations and other contributions	12
3.5 Conflicts of Interest	13
3.6 Market Access activities & pricing strategies including interactions with legislators, government agencies and/or regulatory agencies	14
3.7 Marketing, sales and operational practices	15
3.8 Medical governance, patient support and diagnostic initiatives	16
3.9 Lobbying and other external affairs activities	17
3.10 Interacting with Business Partners	18
3.11 Procurement or Tendering	19
<i>4. Definitions</i>	20

1. Purpose

This document defines and illustrates *the various types of prohibited conduct that could constitute bribery, corruption or influencing to prescribe schemes*, aiming to equip Sanofi employees and any third-party providers who works for or on behalf of Sanofi [such as contractors and business partners] with the knowledge to identify and mitigate corruption risks. Complementing the Code of Conduct principles, it serves as a guide to uphold adherence to anti-corruption and anti-bribery laws and strengthen a culture of integrity. The intention is to safeguard Patient trust and Sanofi's integrity and prevent the legal financial and reputational consequences that arise from corrupt activities.

2. Sanofi's commitments to combating bribery and corruption

2.1 Key Principles

Sanofi stands firmly against bribery and corruption in all their forms. *We are committed* to conducting our business with the *highest ethical standards and in compliance with all applicable laws and regulations*. This commitment is anchored in our core values and principles as expressed into the Sanofi Code of Conduct.

We recognize that the active participation and strong commitment from all of Sanofi's employees are essential in the fight against corruption. Sanofi's dedication to maintaining a culture of integrity and transparency is further embodied in our Code of Conduct, which all employees are expected to follow. In addition, our leadership upholds and communicates this commitment clearly and consistently throughout the organization.

This document also aims to *protect Sanofi and Sanofi Employees' reputations and to avoid potential civil and criminal fines*.

Sanofi, Sanofi Employees and Third Parties are prohibited from giving, promising to give or offering to give Anything of Value, to any Person for the purpose of influencing any act or decision of the Person, and/or the entity the Person represents, in order to secure an improper advantage or to otherwise obtain or retain business for Sanofi. As a pharmaceutical company, such principles apply also to influencing to prescribe schemes toward HCPs as we do not give, promise nor offer anything of value in exchange of prescriptions.

In accordance with all relevant rules, regulations and internal procedures, Sanofi requires that *all books, records, and accounts are kept in reasonable detail* to accurately and fairly reflect all transactions and dispositions of assets and that adequate internal controls are maintained to provide reasonable assurance that management is aware of, and directing, all transactions ethically and in compliance with applicable Sanofi procedures.

Sanofi prohibits Facilitating Payments, even when legally permitted.

Violations of Anti-corruption and Anti-bribery Laws and Regulations may result in civil and criminal penalties for Sanofi and Sanofi Employees, in addition to disciplinary actions against Sanofi Employees according to the corrective and/or disciplinary actions procedure.

2.2 Sanofi Anti-Corruption Program

The Sanofi Anti-Corruption Program is a comprehensive framework embedded into the compliance program designed to prevent, detect, and respond effectively to any potential instances of corruption or bribery. Our program encompasses a wide array of preventive, detection, and remediation measures to reinforce our unwavering stance against unethical practices.

2.2.1 Preventive Measures:

- ✓ **Code of Conduct:** A set of principles and guidelines that all Sanofi employees and third parties are required to adhere to, promoting ethical decision-making and behavior and the application of thoughtful risk taking in the decision-making process.
- ✓ **Ethics and Business Integrity Committees:** The establishment of an EBI Committee is mandatory in each country or Multi-Country Organization (MCO) as well as at global level in each GBU. The EBI Committee's mission is to ensure that at all levels within the organization, a culture where the instinct to do the right things, to act with integrity, to comply with the law and Sanofi policies is truly embedded across the organization.
- ✓ **Ethics & Business Integrity Risk assessment:** Regular Ethics & Business Integrity risk assessments conducted at country level and consolidated at global level.
- ✓ **Procedures:** A set of detailed procedures that govern various aspects of our operations, as well as our interactions with third parties.
- ✓ **Learning Program:** Regular training sessions to ensure employees are aware of their responsibilities and the legal implications of their actions.
- ✓ **Third-Party Due Diligences:** Rigorous risk-based assessments of third-party partners to ensure their commitment to our ethical standards.
- ✓ **Anti-Fraud & Corruption controls embedded into the Internal Control Manual:** Controls that mitigate the risk of fraud and corruption are flagged into the Internal Control Manual thus allowing to either prevent or detect the risk of fraud & corruption
- ✓ **Conflict of Interest end-to-end process and dedicated tool:** Disclosing, detecting, and mitigating Conflicts of Interest effectively allows Sanofi Employees to perform their duties in a fair and unbiased way, protecting the interests of the Company, Sanofi stakeholders, and the patients that we serve.

2.2.2 Detection Measures:

- ✓ **Alert Reporting System:** A secure and confidential channel for employees and external partners to report any suspicious activities.
- ✓ **Investigations, Monitoring and Auditing:** A robust process for investigating reported issues, implementing and monitoring the effective implementation of anti-corruption controls on key risk-areas. Live monitoring conducted on events. Independent internal audit function.
- ✓ **AI used in pattern detection / predictive analytics:** Leveraging on AI capabilities such as Travel & Expenses approved by AI or the monitoring of virtual events in order to identify potential anomalies.

2.2.3 Remediation Measures:

- ✓ **Corrective Actions / Programmatic Enhancement:** Steps taken to address any identified issues promptly and effectively.
- ✓ **Disciplinary Actions and Sanctions:** Enforcement of appropriate disciplinary measures against individuals who violate our anti-corruption policies.

Through these efforts, Sanofi maintains a proactive approach to managing risks associated with corruption and bribery, fostering a culture of integrity and transparency and ensuring that we remain a trusted and responsible organization in the healthcare industry.

3. Main corruption risk areas and activities

This section outlines the key areas where corruption risks may arise and provides guidance on encouraged and prohibited conduct within these areas. It uses definitions from corresponding Sanofi procedures.

Remember: *If you are unsure about any activity or interaction, consult the Legal and Ethics & Business Integrity Department for guidance. If you suspect that the Code of Conduct or any principle set in this document may have been / are about to be breached, report it to the Sanofi Speak Up helpline (speakup-sanofi.com).*

3.1 Transfer of values with healthcare communities

Any transfer of value (sponsorships to congresses, speaker, consulting engagements, contributions or invitations) to healthcare community members, *should be motivated by a genuine business and medical need and should be duly approved and documented.*

Acceptable Conduct	Prohibited Conduct
- Conduct transactions in compliance with Anti-corruption and Anti-bribery Laws.	- Engaging in transactions that could create conflicts of interest or perception of improper influence.
- Maintain transparency on the rationale / purpose and proper documentation for all transfers of value.	- Direct engagements with HCPs for services without prior approval.
- Obtain prior approval from the Medical or R&D function for any engagement or sponsorship involving HCPs.	- Selecting an HCP for speaking engagements in exchange for product prescriptions.
- Disclose contributions to third-party events as per company procedures.	- Offering any form of service or undue advantage to HCPs to influence their prescription practices.

Examples of high-risk situations that may be considered as a corruption / bribery scheme (e.g. influencing to prescribe schemes):

- ✓ A sales representative engages an HCP for a speaker event to reward them for their number of prescriptions / new patients achieved over the last quarter.
- ✓ A doctor suggests to a sales representative that they would prescribe our products if Sanofi sponsors their registration at an international congress together with hospitality costs.
- ✓ Marketing team selects the HCPs to be sponsored for international conferences based on their prescribing habits.
- ✓ An employee arranges a consulting agreement with an HCP who is known to influence formulary decisions, without going through proper channels or ensuring fair market value compensation.
- ✓ Organizing unnecessary advisory boards for a commercial objective, for example on an old molecule that would not require more/new insights, with the sole objective of remunerating HCPs and therefore inducing prescription.
- ✓ An employee organizes an event and artificially increases the number of targeted HCPs in order to bypass the hospitality thresholds or use the extra budget for other improper activities.

Other red flags may include:

- Recurring sponsorships to attend events at which the recipient only passively learns and does not present or speak;
- Instances in which the fees paid seem disproportionate to the work/services provided;
- Inappropriate or unjustified deviation from the Fair Market Value process;
- Conferences with a disproportionate amount of the travel budget dedicated to entertainment activities.

3.2 Accepting or providing gifts and invitations

A Gift or an invitation can be a sign of courtesy that contributes to the maintenance and development of a good business relationship. However, *accepting or providing Gifts or invitations from / to Third Parties may create a Conflict of Interest or the perception of a Conflict of Interest that could negatively impact both the Third Party and Sanofi.*

In addition, *it may be interpreted* under Anti-corruption and Antibribery Laws and Regulations *as being an attempt to corrupt a Sanofi Employee.* It may also create an appearance of impropriety that may harm the reputation of both the Third-Party and Sanofi.

Gifts and invitations must be aligned with ethical standards, internal procedures and the Code of Conduct. Gifts and invitations can only be offered / accepted provided they are compliance with local laws and regulations and international standards and should not be intended to influence any decision or action regarding current or future business with or on behalf of Sanofi.

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Only occasional Token gifts can be accepted - Invitations to professional meals or social activities can be accepted when the frequency and cost are equivalent to what the employee would be authorized to spend on a professional meal. 	<ul style="list-style-type: none"> - Offering or accepting gifts that could be perceived as bribes or improper payments.
<ul style="list-style-type: none"> - Politely decline and return non-compliant gifts. 	<ul style="list-style-type: none"> - Accepting cash or cash equivalents from third parties.
<ul style="list-style-type: none"> - Donate non-returnable gifts to charity or use them for the company's benefit. 	<ul style="list-style-type: none"> - Providing gifts to individuals involved in prescription decision-making.
<ul style="list-style-type: none"> - Disclose accepted gifts as per Conflict of Interest Policy. 	<ul style="list-style-type: none"> - Soliciting gifts or invitations that could influence business decisions.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ An employee accepts a high-value watch or bottle of wine from a vendor after finalizing a large purchase order for the company.
- ✓ A manager purchases expensive liquor / wine (through appropriate delegation of authority) and provides the bottles to HCPs at Sanofi organized events as a “thanks” for the support.
- ✓ During a promotional event, a marketing team member offers a set of expensive golf clubs to a doctor who has the potential to refer a high number of patients for the company's products.
- ✓ A manager invites an important HCP or government official to a prestigious sports event with the hope of facilitating a marketing approval for a Sanofi product.

3.3 Samples and other promotional items

The distribution of samples and free of charge items to HCPs or Distributors is a sensitive area that requires adherence to regulatory guidelines and internal policies to ensure that these practices benefit the patient and support education.

While samples can help educate doctors about newly developed drug therapy options for use with their patients, they can also be seen as unduly influence doctors’ prescribing habits.

Provision of samples must be in line with local Codes, state legislation and regulations. Samples must not be given as an inducement to recommend, prescribe, purchase, supply, sell or administer our products.

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Ensure samples and other items are distributed to HCPs strictly for the benefit of the patient and to support education. 	<ul style="list-style-type: none"> - Distributing samples or items as an inducement for prescribing, recommending, or purchasing products.
<ul style="list-style-type: none"> - Follow all regulatory guidelines and internal procedure regarding sample distribution for example, as applicable, applying a cap on the number of samples permitted to be provided to an HCP. 	<ul style="list-style-type: none"> - Providing samples or items in violation of laws or regulations.
<ul style="list-style-type: none"> - Maintain accurate documentation for tracking and auditing purposes. 	<ul style="list-style-type: none"> - Exchanging samples for personal, non-patient-related benefits.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ A sales associate provides excessive product samples to a doctor who has agreed to increase the number of prescriptions. Doctor collects samples and sells them out of their offices to patients or pharmacists.
- ✓ Sales representative provides samples to HCPs / Pharmacists, in return for them prescribing or dispensing our product instead of competitor’s.

3.4 Donations and other contributions

Donations and other contributions in the healthcare industry present a risk of unethical conduct that could influence business decisions or gain unfair advantage. This risk activity includes the use of donations and contributions to improperly influence healthcare professionals (HCPs), healthcare organizations (HCOs), or other stakeholders.

These contributions cannot be made for a commercial or promotional purpose and shall not be intended to reward or influence the prescribing, purchasing, formulary placement, or other decisions regarding our products.

The company must ensure that all donations and sponsorships are aligned with ethical standards, are transparent, and made for legitimate purposes.

Acceptable Conduct	Prohibited Conduct
- Ensure donations and other contributions are made transparently and in accordance with company procedures and ethical standards.	- Making donations to individuals or organizations to improperly influence business decisions.
- Document all contributions and obtain necessary approvals.	- Providing contributions or donations in exchange for prescribing or purchasing products or for accelerating the registration of a product.
- Align healthcare contributions with the therapeutic areas where Sanofi operates.	- Failing to comply with transparency reporting requirements for donations and contributions.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ A manager proposes to provide a charitable donation to an association whose president is also a key decision maker in the Ministry of Health, with the objective of influencing their decision to register one of Sanofi's products.
- ✓ An employee approves a donation / contribution to a healthcare organization and then informally suggests that this should lead to the company receiving preferential treatment in procurement processes.

3.5 Conflicts of Interest

Conflicts of interest arise when personal interests potentially interfere with professional obligations, leading to biased decision-making that can harm the company's interests. Employees must be vigilant in identifying, disclosing, and managing conflicts of interest to maintain the integrity of business decisions and actions.

Acceptable Conduct	Prohibited Conduct
- Disclose any potential or actual conflicts of interest in accordance with company procedure.	- Failing to disclose potential conflicts of interest.
- Take appropriate steps to mitigate any conflicts that arise.	- Engaging in business activities that compete with the company.
- Avoid situations that may lead to a conflict of interest or perception of a conflict of interest	- Using company resources or information for personal gain.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ An employee fails to disclose a significant financial interest in a competing company while being involved in decision-making that could affect both businesses.
- ✓ A procurement manager influences the vendor selection process to benefit a company owned by a family member, compromising the integrity of the procurement process.
- ✓ An employee who's relative is the owner of one of the distributors working for Sanofi.

3.6 Market Access activities & pricing strategies including interactions with legislators, government agencies and/or regulatory agencies

Market access activities and pricing strategies involve engagements with government entities, which are subject to stringent regulations to prevent undue influence and corruption. *Employees must act transparently and ethically, ensuring that all interactions are compliant and that pricing strategies are fair and justified.*

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Engage with government entities transparently and in compliance with all applicable laws and regulations. 	<ul style="list-style-type: none"> - Offering or accepting bribes to influence pricing, reimbursement, or market access decisions.
<ul style="list-style-type: none"> - Ensure pricing strategies are fair, justified, and properly documented. 	<ul style="list-style-type: none"> - Proposing gifts or invitations to an official in order to accelerate a pricing or reimbursement decision.
<ul style="list-style-type: none"> - Provide accurate and truthful information during interactions with legislators and agencies. 	<ul style="list-style-type: none"> - Providing funding / contributing to patients / patient associations in exchange their exerting pressure on the authorities for the reimbursement of a particular product.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ Attempting to sway a legislator's vote on healthcare policy by implying future employment opportunities or other personal benefits.
- ✓ Offering a gift to a relative of a public official to use their influence to obtain a favorable decision, such as an accelerating a market authorization;
- ✓ Accept the solicitation of an illegal payment by a government official threatening to delay the registration process or to favor competitors.

3.7 Marketing, sales and operational practices

Marketing, sales, and operational practices must adhere to ethical standards and regulatory requirements to ensure that product promotion is truthful and non-deceptive. *Employees should focus on providing accurate product information and engaging in fair competition.*

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Uphold integrity by ensuring that all marketing and sales activities are transparent, truthful, and comply with international and local regulations. 	<ul style="list-style-type: none"> - Do not engage in practices that distort or misrepresent product information to manipulate customer decisions or to gain an unfair competitive advantage.
<ul style="list-style-type: none"> - Maintain a commitment to fairness by engaging only in practices that support honest competition and by avoiding any actions that could undermine market integrity. 	<ul style="list-style-type: none"> - Avoid conflicts of interest or any activity that could be perceived as a bribe or improper influence in sales or marketing decisions.
<ul style="list-style-type: none"> - Promote continuous education and training for sales, marketing, and operational teams to foster a deep understanding of the Code of Conduct and conducting ethical business practices 	

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ While using an approved promotional brochure, Sanofi employee provides misleading information regarding the safety and efficacy of a medicine to influence HCPs prescribing habits and encouraging off-label, unlicensed use to increase sales.
- ✓ Sales employee selects an HCP to be speaker to reward the HCP for prescribing a Sanofi product in off-label use and influencing other HCPs to use the product in off-label.
- ✓ Product manager instructs an event coordinator to purchase gift vouchers for HCPs and invoiced them as "decor" for tables at a Sanofi event.

3.8 Medical governance, patient support and diagnostic initiatives

Medical governance, patient support, and diagnostic initiatives should be conducted with a focus on patient outcomes and without commercial bias.

The company must ensure that these activities support patient care and are not used to inappropriately influence product usage.

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Ensure patient support programs are compliant with legal requirements and support patient access to care. 	<ul style="list-style-type: none"> - Using patient support programs to inappropriately influence the use of products. - Conditioning the availability of Sanofi medicines on the willingness of patients, patient advocates or patient associations to engage or interact with Sanofi.
<ul style="list-style-type: none"> - Maintain the independence of medical governance activities from commercial influence. 	<ul style="list-style-type: none"> - Manipulating diagnostic initiatives to favor a specific product or therapy.
<ul style="list-style-type: none"> - Focus on improving patient outcomes through support and educational initiatives. 	<ul style="list-style-type: none"> - Offering incentives to HCPs to encourage the use of specific diagnostic tools or services.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ Designing a patient support program that subtly pressures patients to choose the company's branded drugs over generics or competitors' options.
- ✓ Sales representatives presenting Sanofi's diagnostic testing program or patient support / assistance programs to HCPs as a sales tool to influence them to prescribe Sanofi product(s).
- ✓ Medical teams sharing with commercial teams detailed information regarding the diagnostic testing program and test results, this information being then used to influence the HCPs in their choice of treatment.

3.9 Lobbying and other external affairs activities

Sanofi’s interactions with governments and society are necessary to promote our mission and position as a key partner in discovering, developing, and delivering health care solutions to people around the world.

Information shared by or on behalf of Sanofi with our stakeholders must be objective, balanced, reliable, accurate, truthful and up-to-date and supported by evidence that does not misrepresent facts.

Lobbying and external affairs activities must be conducted ethically and in compliance with legal requirements to ensure that the company's interests are represented without engaging in corrupt practices. Transparency and adherence to lobbying laws are essential.

Acceptable Conduct	Prohibited Conduct
<ul style="list-style-type: none"> - Conduct lobbying activities in a transparent and ethical manner, in line with company procedures and legal obligations. 	<ul style="list-style-type: none"> - Lobbying activities are performed without proper authorization or in violation of lobbying laws. - Non authorized and untrained employees dedicates a significant amount of time to lobbying activities. - Lobbying services paid for without ensuring that there is a documented proof of service. - Disguising lobbying activities through a consulting contract and without proper disclosure.
<ul style="list-style-type: none"> - Keep accurate records of all lobbying contacts and expenditures. 	<ul style="list-style-type: none"> - Providing false or misleading information to officials during lobbying activities.
<ul style="list-style-type: none"> - Ensure that all Public / Government affairs activities are consistent with the company's values and public commitments. 	<ul style="list-style-type: none"> - Using company funds for political contributions without proper approval or in a non-transparent manner.

Examples of high-risk situations that may constitute a corruption / bribery scheme:

- ✓ A Sanofi representative disguising an unreported payment for a legislator's travel to a conference as a scholarship, to circumvent lobbying disclosure rules.
- ✓ Sanofi lobbyist offered undisclosed financial incentives to government officials in exchange for favorable policy decisions related to drug pricing regulation.

3.10 Interacting with Business Partners

Interactions with business partners must be based on objective criteria to ensure fair and ethical business practices. The company must conduct due diligence and maintain high standards of integrity in its business relationships.

Acceptable Conduct	Prohibited Conduct
- Select business partners based on objective criteria such as quality, reliability, and integrity.	- Forming business relationships that pose a risk of corruption or conflict of interest.
- Conduct due diligence and regular reviews of business partners to ensure compliance with ethical standards.	- Ignoring red flags or warnings of unethical behavior by business partners.
- Clearly communicate expectations regarding ethical behavior and compliance to all partners that aligns to our Code of Conduct.	- Failing to address or rectify known compliance issues with business partners.

Examples of high-risk situations that may result in or constitute a corruption / bribery scheme:

- ✓ Providing inflated, above-market discounts to third-party distributors that enable the distributors to make improper payments to HCPs.
- ✓ Continuing a partnership with a vendor known to engage in corrupt practices without taking corrective actions.
- ✓ Entering into an alliance / partnership with a third-party without having conducted proper background checks or due diligence on the partner.
- ✓ Choosing a supplier solely based on personal relationships, ignoring the supplier's poor track record in quality and compliance.

3.11 Procurement or Tendering

Procurement or tendering processes must be undertaken with the highest level of integrity and fairness. The company is committed to avoiding any actions that may compromise the transparency or ethical conduct expected in tendering activities.

Corruption can occur in all stages of the procurement process: pre-bidding stage, bidding stage and post-bidding stage.

Acceptable Conduct	Prohibited Conduct
- Engage in procurement and tendering with integrity.	- Attempting to improperly influence the outcome of a tender.
- Refrain from actions that could be perceived as corrupt.	- Engaging in any form of bid rigging or collusion with other bidders.
- Maintain accurate records of all tender-related documents and interactions.	- Offering or accepting any form of bribe or kickback.

Examples of High risk situations that are may constitute a corruption / bribery scheme:

- ✓ Influencing the specifications of a tender, so that only a predetermined company can win, making it appear as if the tender was awarded on the basis of merit without technically violating any rule or procedure.
- ✓ Accepting a payment, gift or extravagant invitation from a potential supplier in return for confidential information about the tendering process.

The above guidelines provide clarity on acceptable and unacceptable practices within Sanofi, ensuring that all employees understand and adhere to the company's commitment to ethical conduct and compliance with anti-corruption laws.

4. Definitions

Anti-corruption and Anti-bribery Laws and Regulations: Legal frameworks designed to prevent, detect, and punish bribery and corruption. This includes both national legislation, such as the French Law of December 9th 2017 on Transparency, the Fight Against Corruption and the Modernization of the Economy (Sapin 2 Law), the U.S. Foreign Corrupt Practices Act (FCPA), and the U.K. Bribery Act (UKBA), and international conventions like the Organization for Economic Co-operation and Development Anti-Bribery Convention and the United Nations Convention against Corruption.

Anything of Value: An inclusive term covering all goods, services, privileges, advantages, or items that can be used to influence a decision or obtain an improper advantage. This may involve tangible or intangible assets, including but not limited to cash, gifts, entertainment, meals, travel, employment offers, loans, donations, or any other benefit.

Bribery: A corrupt practice entailing the offer, promise, provision, request, or acceptance of any item of value with the intent to influence the actions or decisions of individuals in positions of authority or trust in an illegal, unethical, or breach of trust manner.

Conflict of Interest: Situations where there is a risk that Sanofi Employee's Personal Interest will interfere with, or has the appearance of interfering with, Sanofi's legitimate business interests.

Facilitating Payments: Small payments or fees requested or paid to expedite or facilitate routine and non-discretionary government actions. Although they may be legal in some jurisdictions, such payments are prohibited by Sanofi.

Government Official: A person who holds a legislative, administrative, or judicial position of any kind, whether appointed or elected, of a country or territory. They can also be any person exercising a public function, including for a public agency or public enterprise, or represents a political party or is a candidate for political office.

Government or Government Organization: Any part of a national, regional, or local government, including but not limited to departments, agencies, or entities controlled by the government, as well as public international organizations.

Improper Influencing (aka Influence peddling): influence peddling is a form of bribery and usually involves three people: 1) A target person or body with decision-making power (public authority or administration), 2) An intermediary, public official or private person, who uses their position, and 3) A beneficiary. It is defined as *"The direct or indirect request or acceptance without right and at any time of offers, promises, donations, gifts or advantages for oneself or others, when done by a person holding public authority or discharging a public service"*

mission, or by a person holding a public electoral mandate: to carry out or abstain from carrying out an act relating to his office, duty, or mandate, or facilitated by his office, duty or mandate; or to abuse his real or alleged influence with a view to obtaining from any public body or administration any distinction, employment, contract or any other favorable decision."

Lobbying: occurs when an individual, or an organization, communicates through oral or written communication directly (Sanofi authorized employee or Consultant) or indirectly through third parties in attempt to influence the design, implementation, execution and evaluation of public policies and regulations administered by executive or legislative Public Officials at the local, regional, national and global levels.

Token Gift: Items of minimal value, usually less than 5 Euros or local equivalent.