

Human Rights Position Statement

July 2025

Our commitment to human rights

Respecting human rights is foundational to responsible business. Sanofi has a responsibility to respect human rights through our engagements with patients, our employees, our suppliers, and the communities in which we operate. As a multinational organization with global reach, we seek to prevent and mitigate adverse human rights impacts in our global operations and those of our business partners and remediate any adverse impacts we may inadvertently cause or contribute to.

We are committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises throughout our activities and those of our business partners. Our commitment embraces all internationally recognized human rights defined in the International Bill of Human Rights, including, among others, the Universal Declaration of Human Rights (UDHR) and the International Labor Organization's (ILO) Core Labor Rights Conventions. As member of the United Nations Global Compact, Sanofi is committed to its 10 principles.

We comply with national law wherever we operate. There may be instances when the specific application of above-mentioned international standards varies, depending on local laws or regulations. In cases where international standards set forth higher requirements than those set in local laws or regulations, the application of international standards must prevail. Where local laws or regulations impose higher requirements than those set in the international standards, local laws and regulations must prevail. Where they conflict, we strive to uphold the principles of international standards.

Our commitment to human rights is embedded in our Code of Conduct, our Supplier Code of Conduct, our principles, procedures, and practices.

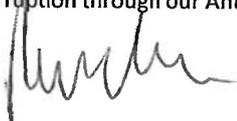
We expect our employees and business partners—including our suppliers and customers—to share our commitment to respecting human rights. All suppliers shall comply with our Supplier Code of Conduct, which sets forth our expectations on their own business practices.

We are committed to taking a partnership approach, working with others who have the mandate, competence and capacity to facilitate change where we can. We are an active member of the Pharmaceutical Supply Chain Initiative (PSCI) and *Entreprises pour les Droits de l'Homme* (EDH).

Our priority areas of focus, based on what we consider to be our salient human rights issues are the following:

- Right to health including providing access to medicine to patients, ensuring safety in clinical trials, ensuring product quality and fighting against falsified medicines.
- Labor rights including prohibition of child and forced labor, human trafficking, discrimination and harassment, respect for freedom of association and collective bargaining, just and favorable working conditions and ensuring a safe workplace.
- Rights of communities including protecting their environment and their fundamental rights.
- Human rights and innovation including respecting data privacy, bioethics and artificial intelligence.

We also recognize that bribery and corruption may lead to negative impacts on human rights and we strictly prohibit all forms of bribery and corruption through our Anti-Bribery Policy.



Paul Hudson
CEO



Sandrine Bouttier-Stref
Global Head of Corporate Social Responsibility

Governance

Responsibilities & accountability

This position statement was approved by the Sanofi Executive Committee. Overall accountability for the implementation of our human rights commitments sits with Sanofi's Global Head of Corporate Social Responsibility (CSR), who reports to our executive Vice President, Corporate Affairs, who in turn reports to our CEO.

We have set out effective cross-organizational and collaborative efforts to fulfil our commitment to respect human rights. A dedicated Human Rights and Diligence Global Lead within the CSR department is responsible for operationalization of Sanofi's human rights strategy and works closely with Procurement, People & Culture, Ethics and Business Integrity, Internal Audit, Environment Health and Safety, and Security.

Our executives, our managers, our employees, our suppliers, and our business partners bear a responsibility to act in a way that prevents adverse impacts to human rights as outlined in this statement.

Integration of human rights in our management systems

We are committed to regularly reviewing this statement and our company codes, principles and procedures on human rights to ensure they remain in line with international regulations and best practice, as well as the evolving expectations of our patients, employees, and communities. Furthermore, we seek to embed our commitments on human rights in our overall business management system to ensure human rights are taken into account in the way we conduct business. Key documents governing human rights include, but are not limited to:

- Code of Conduct.
- Supplier Code of Conduct.
- Internal relevant Global Operating Procedures including fundamental human rights considerations.
- Internal Corrective and/or Disciplinary Actions Management Standard setting out our zero-tolerance for harassment and discrimination.
- Global Reporting and Investigations Management (whistle-blowing system).

Due diligence

We have due diligence processes and management systems in place across our business to identify and address human rights risks and impacts. Since 2013, we have assessed and mapped our risks to human rights, including those of our suppliers. Prioritizing on our most salient risks, we integrate and act on the findings by implementing prevention and mitigation measures where needed. We recognize that human rights due diligence is a process of continuous improvement, and we review and refine our approach on an ongoing basis.

We seek to engage with internal and external stakeholders as well as rightsholders (e.g. employees, workers in the supply chain, patients, communities) with a particular focus on vulnerable groups such as women, persons with disabilities or LGBTI+ people to collect their views, concerns, and recommendations.

Prevention through capability building

Every Sanofi employee has a role to play in delivering on our commitment to respect human rights. All new and current employees are required to complete annual Code of Conduct training, which covers human rights themes. In addition, we provide in-depth human rights trainings to key functions who are responsible and play an active role in respecting human rights.

Sanofi collaborates with the Pharmaceutical Supply Chain Initiative (PSCI) to train our key suppliers.

Alert mechanism & remediation

Any employee or external stakeholder who is victim or witness of a violation of human rights can report the issue using a secure Helpline or report violations to management or identified internal stakeholders. The Helpline is a safe channel operated by a third-party vendor and overseen by the Ethics and Business Integrity department. Reports to the Helpline can be made through a web-form or via a toll-free number available in multiple languages 24 hours a day, 7 days a week. The system allows reporters to report anonymously if they wish, check and follow-up on their reports and to also check if responses, updates, or requests to provide further details or information have been posted.

Reporters will not be disciplined or penalized as a result of using the Helpline provided they acted in good faith without malicious intent, even if the report turns out to be inaccurate or no further measures are taken.

Alongside the global Helpline, Sanofi has specific mechanisms in place for patients to flag up issues and give early warnings about drug safety.

We are committed to providing effective resolution where we have caused or contributed to adverse human rights impacts. Where we find adverse human rights impacts directly linked to our business relationships, we use our influence to encourage our suppliers or business partners to prevent, mitigate and remediate those impacts. We aim to engage in activities to confirm supplier conformance to our human rights expectations and conformance to our Supplier Code of Conduct and may disqualify any potential supplier or terminate any relationship with a current supplier that has failed to conform.

Reporting and disclosure

We regularly report on our progress on human rights activities and outcomes across the business through internal reports and externally through our Annual Report on our Duty of Vigilance, integration of human rights dimensions into our declaration of Extra Financial performance (ESG report) and legislation required reports, such as Modern Slavery reports.

Right to health

Access to medicine

Sanofi strives to provide better health and access to quality medicines and vaccines for patients and populations who need them around the world. The company shares this responsibility with the actors of local healthcare systems and is committed to playing its part. Sanofi adopts an approach adapted to the specifics of both healthcare systems and local needs, through different access models. Sanofi's approach to access to healthcare is applicable to all Global Business Units and countries where the company operates. Further information on our position for access to medicine can be found in the Chapter 4 of our Universal Registration Document.

Clinical trials

Sanofi adheres to the highest ethical standards and commits to conducting clinical trials in accordance with international human rights standards designed to protect patient rights and safety, including the Declaration of Helsinki and Good Clinical Practices. In addition to those international standards, Sanofi complies with all applicable national and international rules and laws.

We ensure that all participants enrolled in clinical trials (or their legal representatives) give their free, prior and informed consent based on clear, complete information, approved by competent Institutional Review Boards / ethics committees, that is expressed in an understandable, non-technical style, especially for trial participants who may be vulnerable for any reason such as age, literacy and other factors. Our clinical trials are diversely informed by patient and medical communities to ensure they reflect relevant health related outcomes, reduce the barriers and burden of participation to the greatest extent possible.

We provide healthcare professionals conducting our clinical trials, patients and relevant legal stakeholders with relevant information as part of the awareness, education and consent process so that they can make informed clinical trial and associated medical decisions. This applies not just to information provided in advance and during clinical trials, but also to the sharing of the data generated by those trials. Sanofi commits to transparency requirements, timely posting on relevant websites the synopses of the studies and their results.

As a signatory to the Guiding Principles on Access to Healthcare, our practice is to perform clinical studies in countries where we intend to make the product available. To ensure that the products are tested in the population that will benefit from the treatment under development, we developed a Minority Diversity in Human Clinical Trials Policy. Sanofi has also committed to the Pharmaceutical Research and Manufacturers of America (PhRMA) Principles on Clinical Trial Diversity. In addition, Sanofi R&D has created a Clinical Trials Inclusion & Diversity Program (CT-IDP) which is working to identify ways to reduce barriers to participation and improve access that enables clinical trial participation. All clinical trials have US diversity goals established and we commit to annual public reporting on our progress towards meeting the goals.

Further information on our positions, principles and management systems governing clinical trials can be found in our Medical Ethics & Bioethics factsheet.

Product quality and falsified medicines

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

- Protect patient health by monitoring the safety of our medicines and constantly assessing the benefit/risk profile of our products.
- Supply physicians, healthcare professionals and patients with full and up-to-date safety information, including potential risks associated with a product.
- Report to the regulatory authorities on a timely basis, in accordance with international and local regulatory requirements and our own Global Quality Standards and
- Set up a dedicated and holistic approach to fight against falsified medicine and illicit trafficking, to protect patients and preserve trust in the supply chain.

Further information can be found in our Product Quality Management System factsheet and the Chapter 4 of our Universal Registration Document.

Intellectual property protection

Sanofi believes that patents are a fundamental incentive for driving innovation in the pharmaceutical sector. The development of new medicines and vaccines is a risky, costly, and lengthy process. Patents should not be an obstacle to access to healthcare, and Sanofi believes that being transparent and flexible with our patents can help in responding to urgent health challenges in developing countries. Since December 2019, Sanofi has publicly disclosed the patent status of its essential medicines and vaccines in developing countries. Sanofi's disclosure was updated in 2023, in line with the new List of Essential Medicines published by the WHO in 2023. We have also confirmed that it will not file or enforce patents in Least Developed Countries (LDCs) or Low-Income Countries (LICs). This also applies to some lower-middle and upper-middle income countries. The disclosures are provided in full in the Document Center on www.sanofi.com. Further information on our position on intellectual property can be found in our R&D for unmet needs & patent management factsheet.

Labor rights

Child labor

We support the right of children to a childhood free of work responsibilities. We prohibit the employment of young persons (under the age of 18) anywhere in our business or those of our business partners, other than in compliance with ILO Conventions 138 and 182 and all applicable laws and regulations concerning age, hours, compensation, health and safety. For example, any of the following situations is strictly forbidden for young workers under 18: working at night, working excessive overtime or being exposed to chemicals, pesticides, machines or tools, dust or excessive cold, heat or noise. Workers under the age of 18 are subject to an appropriate risk assessment and regular monitoring of their health and working conditions.

Forced labor, modern slavery and human trafficking

We strictly prohibit all forms of forced, bonded, indentured, or compulsory labor in our operations and those of our supply chain in accordance with ILO Conventions 29 and 105. Workers must not be required to lodge original identification papers or monetary deposits on starting work. They must be able to leave their employer after reasonable notice, the period of which should be agreed upon engagement, and should receive all owed salary.

Modern slavery is a critical issue for a range of industries, including those we source from, and in almost all countries. We recognize that the risks of modern slavery are particularly likely where our business partners rely upon migrant workers and other workers who are particularly vulnerable to exploitation.

Freedom of association and collective bargaining

All our employees and workers of our supply chain must be free to establish and join associations and/or labor unions for the promotion and defense of their interests in accordance with ILO Conventions 87 and 98. We respect each worker's right to make an informed decision about membership in these associations without fear of reprisal or discrimination. Sanofi and our business partners are required to bargain in good faith with these associations.

Non-discrimination and equal treatment, no harassment

We prohibit discrimination and harassment in the workplace and seek to create a diverse, equitable and inclusive environment that treats all employees with dignity and respect in accordance with ILO Conventions 100 and 111. All employment decisions are based on merit, considering qualifications, skills and achievements. We have zero tolerance for harassment (e.g. physical, sexual, psychological, verbal, or of any other form) and discrimination in hiring or employment practices - including remuneration - 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.

At Sanofi we believe in paying equitably for similar work. Any differences in salary should be clearly explainable in line with Sanofi's pay policies (grade, job profiles, location, skills, etc.). Where disparities exist, we seek opportunities to allocate specific budgets to address pay gaps in one or multiple steps.

Sanofi is committed to speaking out against discrimination, confronting conscious and unconscious bias, and leading courageous conversations with colleagues and with those in our communities so that we can make a meaningful impact. Further information can be found in our Code of Conduct.

We have established a Global Corrective and Disciplinary actions Management Framework which sets out clear expectations and procedures triggered in case of proven discrimination or harassment.

Just and favorable working conditions – living wage

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 in accordance with ILO Conventions 1, 14, 30, 95, 106 and 131. Overtime work is voluntary with recognition of business needs and due care for the health and safety of workers.

Sanofi is committed to paying all employees a 'living wage' which enables them and their families to meet their basic needs.

Safe workplace

At Sanofi, we are committed to the health and well-being of our employees in accordance with ILO Conventions 155, 161 and 187. We create and promote a safe and healthy workplace throughout our operations and require our third parties to implement rigorous health and safety standards. Our commitment is outlined in our Corporate Health, Safety and Environment Policy which is supported by a range of global health and safety standards that detail the requirements to evaluate risks, implement controls, and comply with legal requirements to safeguard the health and safety of those involved in our operations. Beyond safe practices, we know that we must prioritize the development and well-being of our employees, so we work to protect and improve the health of our workforce, focusing on physical and psychological safety. Further information can be found in our Health and Safety in the Workplace factsheet.

Respect for our communities

Rights of our neighboring communities

We respect the human rights of our neighboring communities in areas where we operate or have manufacturing and distribution facilities. Where appropriate, we engage in dialogue with local community representatives on human rights issues to ensure that we consider their views as we conduct business. We acknowledge that some community rightsholders may be more vulnerable to impacts and that targeted consultation of vulnerable groups —identified on a case-by-case basis—is necessary to obtain their free and prior informed consent.

We aim to produce sustainable results and positive community impact through our local content practices and employee volunteering. We seek to limit the environmental footprint of our sites and adopt circular solutions to preserve natural resources and protect and foster biodiversity local communities may rely upon.

Right to a healthy environment

Negative impacts to the environment can have direct consequences on human rights to life, health and well-being, access to clean water and sanitation, and livelihoods among other rights. In 2022, the United Nations specifically adopted a resolution recognizing the human right to a clean, healthy, and sustainable environment.

At Sanofi, we acknowledge that environmental impacts can affect communities globally and commit to assess and minimize the environmental impacts of our operations and products over their lifecycle. We set ambitious objectives and are implementing dedicated action plans in our direct and indirect activities. We expect our suppliers to do the same through our Supplier Code of Conduct to address issues including but not limited to climate change, pollution, water, waste and pharmaceuticals in the environment.

Further information on our ambitions and work to reduce environmental impact can be found in the Chapter 4 of our Universal Registration Document.

Human rights and innovation

Data privacy

For Sanofi, it is of utmost importance that we protect the privacy of our employees and of patients, clinical trial participants, healthcare professionals and other partners with whom we interact. We protect personal data entrusted to us by handling it properly, using it only for the intended and legitimate purposes, and considering the full rights of the individual at all times as stipulated by applicable law. This is especially important in light of current developments in information and communication technologies.

Our global approach to the processing of personal data is set out in two policies: the Sanofi Global External Privacy and Data Protection Policy, and the Sanofi Global Internal Privacy and Data Protection Policy. The commitments set out in the policies are without prejudice to the application of and compliance with the privacy laws and/or local culture of each country where we process personal data. We also apply our policy requirements contractually to third parties processing personal data on behalf of Sanofi (such as consultants, service providers, vendors or other partners), for example by asking them to sign data transfer agreements.

Bioethics

Sanofi's Bioethics Committee, chaired by our Chief Medical Officer, ensures that we conduct our scientific and medical activities with the highest ethical standards. Sanofi regularly reviews and adapts the governance of Bioethics to consider the changing expectations of stakeholders, strengthen patient centricity and ensure greater transparency. On a regular basis, we consult external bioethicists and review our bioethical framework.

Our Bioethics Committee also takes a close interest in the ethical use of new technologies in our scientific and medical activities. For example, we have published a Policy on Gene Editing and Gene Therapy Technologies, which describes the opportunities for those technologies but also sets limits on their use.

We support fair and equitable access and benefit sharing, as set out in the Convention on Biological Diversity (Nagoya Protocol). A key objective of this agreement is to ensure that countries providing genetic resources that are covered by the protocol also benefit from their use. We have common standards and processes in place to systematically assess and deal with instances of access and benefit sharing.

Artificial Intelligence

Artificial Intelligence (AI) systems promise to bring significant economic and social benefits to the pharmaceutical industry such as faster and safer drug discovery, through to improved engagement with our stakeholders. However, these benefits are coupled with ethical and legal challenges. Sanofi's position on Responsible AI is grounded in five pillars: Accountable to Outcomes, Fair & Ethical, Robust & Safe, Transparent & Explainable, and Eco-Sustainable. Each of these pillars have stances underpinning them to "bring to life" what they mean from a practical perspective. To enable the stances, a set of controls were defined across governance, process, technology, and training, that are intended to be set in place to manage the risk of the AI System in line with binding rules, AI ethical principles of the International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), and the Organization for Economic Co-operation, and Development (OECD) AI Principles. Controls are applied as an outcome of a risk-based approach to managing responsible AI.

Based on this intent, we have issued Guiding Principles for Artificial Intelligence at Sanofi, which applies to the entire AI System Lifecycle including third party AI systems and generative AI.

References

General

[Annual Vigilance Plan](#)

[Sustainability Statement \(Chapter 3 of Universal Registration Document\)](#)

[Code of Conduct](#)

Access to Medicine

[R&D for Unmet Needs & Patent Management](#)

Product Quality

[Global Quality Policy](#)

[Product Quality Management System factsheet](#)

[Global Quality Manual](#)

Bioethics

[Medical Ethics and Bioethics](#)

[Bioethics Policies](#)

Labor Rights

[Supplier Code of Conduct](#)

[Health, Safety and Environment Global Policy](#)

Alert Mechanism

[Speak Up](#)

Artificial Intelligence

[Responsible AI Guiding Principles](#)

Anti-Bribery

[Principles on Anti-Bribery and Anti-Corruption](#)