

CODE OF CONDUCT

1. INTRODUCTION

- 1.1 This Policy reaffirms the general business principles that govern how Servier Laboratories Ltd and Servier Research and Development Ltd, “the Company”, conducts its affairs and provides a Code of Conduct which must be followed without exception. While it is impossible to anticipate or provide for every situation that may arise, the Code is a brief statement of the standards of business conduct which should guide your everyday decisions. You are expected to make judgements about what is right and proper and will be held accountable for your judgements.
- 1.2 The Company has as its core values: mutual trust and support; ethical behaviour; the highest quality (in all that we do); knowledge and learning; innovation and progress; and a strong work ethic. These underlying corporate values, together with the Company’s mission and vision, describe the behaviour expected of every worker in the Company.
- 1.3 The Company recognises that maintaining the trust, confidence and respect of workers, employees, customers and the communities in which the Company works, is crucial to the Company’s continued growth and success.
- 1.4 We intend to merit this trust by conducting ourselves according to the standards set out below and in accordance with the Company Values.
- 1.5 The rules contained within this Policy are designed to promote high standards of conduct, fairness, consistency and order within the Company. The Code of Conduct does not refer to every situation which may arise; instead it is intended to provide a number of important examples which reflect the standards of behaviour required by the Company. It is therefore important that you read and understand them in order to appreciate the general standard of conduct which is required.
- 1.6 If you have any doubt about the meaning of a rule or the application or interpretation of this policy, you must ask for clarification during your induction training or from your Line Manager at any time.

2. SCOPE

- 2.1 This Code of Conduct will apply to all employees employed by the Company, including all temporary employees and all associated persons such as contractors, and consultants who work under a contract for services (collectively, the “workers” for the purposes of this Code).

- 2.2 The Code of Conduct applies to you whilst on site and off site and whilst representing the Company during or outside working hours.
- 2.3 You should consider yourself an ambassador of the Company and should behave in an ethical manner, creating a positive image to fellow colleagues, patients, healthcare professionals and the pharmaceutical and scientific communities.

3. RESPONSIBILITY

- 3.1 All those persons referred to within the scope of this policy are required to adhere to its terms and conditions. An employee's failure to comply may result in disciplinary action being taken which may lead to dismissal. You are expected to report any infringement of the Code of Conduct to your Line Manager or Servier contact at the earliest opportunity.

4. ATTENDANCE

- 4.1 You should work in accordance with the terms and conditions contained in your contract of employment or contract for services. You should ensure that you are familiar with the rules concerning the granting of leave and the notification of sickness absence, and follow these at all times.
- 4.2 Failure to attend work can cause serious disruption and places unnecessary and unreasonable burden on colleagues who have to provide cover.

5. RELATIONSHIPS WITH OTHERS

- 5.1 The Company follows and encourages fair and non-discriminatory employment practices and offers equal opportunities to all workers. All of us must work and relate with each other in a professional manner on the basis of mutual trust, respect, cooperation and individual dignity. We must avoid actions and words that could be considered discriminatory, hostile, improper or offensive in any situation.

6. WORK PERFORMANCE

- 6.1 In order to inspire you to fulfil your potential, the Company believes that you have the right to know what is expected with regard to work performance and key objectives, and to have regular feedback on how well you are doing. The Company also has a strong commitment to training, to provide you with appropriate knowledge and skills and to develop your potential.
- 6.2 You are expected to work to your agreed job description and performance objectives and in accordance with prescribed standards and procedures. Flexibility is required which may require you to vary your duties and responsibilities from time to time within the scope of your contract of employment or contract for services. You should not refuse to carry out a reasonable instruction from your Line Manager to carry out specific tasks. Failure to carry out reasonable instructions may lead to disciplinary action.

- 6.3 You are expected to work in accordance with the Company's SOPs, regulations and policies, including external guidelines that the Company subscribes to such as, but not limited to, the ABPI Code of Practice and Good Clinical Practice. You must ensure that the following points are adhered to (NB. this is not an exhaustive list):
- 6.3.1 Field based employees must refrain from email correspondence with healthcare professionals with any promotional claims (reference to a Servier product is promotional) or any discussion of competitor products.
 - 6.3.2 Only materials that have been approved through the regulatory process can be used. Requests for approval of materials that are product specific should be sent to your line manager for forwarding through Sales Management to the Medical and Scientific Information Department.
 - 6.3.3 All contact with healthcare professionals must be code compliant. Participation in any event with no educational content is unacceptable.
 - 6.3.4 Requests for medical information on Servier products or therapy areas should be forwarded, using the appropriate request form, to: medical.information@uk.netgrs.com.
- 6.4 You are invited to submit ideas to increase efficiency, reduce costs, increase output and raise quality and safety standards to enable the Company to realise its vision of becoming the most productive, professional and progressive company within the Servier Research Group and a net contributor of talent, ideas and inspiration to the global Servier family.

7. HEALTH AND SAFETY

- 7.1 The Company is committed to ensuring the health, safety and welfare at work of all our workers and others who come into contact with the Company. Health and Safety procedures have been put in place and you have a duty of care to operate these to the highest standard. These procedures are available from the Human Resources Department.

8. CONFIDENTIALITY

- 8.1 During the course of work you may come into possession of confidential information concerning the intellectual property of the Company. This is privileged information which you are under a duty to protect. You should maintain absolute confidentiality regarding Company information, records or data collected and used in the course of your employment or engagement with the Company.
- 8.2 You must not publish literature, or make any communication to the press, radio, television, internet, social networks or any other media, relating to the business or any other matters in which the business is concerned unless this is with the authority of the Chief Executive Officer.

9. DRESS AND APPEARANCE

- 9.1 You are expected to dress in an appropriate manner that will not cause unnecessary offence to customers, other workers or any other business contacts. You should also give attention to your overall grooming and ensure that clothing, hair and accessories are neat, clean, tidy and relevant to the work being done.

10. COMPANY PROPERTY

- 10.1 You must not use the Company property, or any other property on the Company's premises, for any purpose other than that for which it was intended and for which you have authorization. Also, you must not remove any article or articles which are Company property, or any other individual's property kept on Company premises, without authorisation from your Line Manager. Upon termination of employment, you must ensure that you return all property belonging to the Company in accordance with your contract of employment or contract for services.
- 10.2 All property belonging to the Company, workers, visitors and customers should be treated with respect at all times. Any deliberate or wilful damage to Company property, or the property of others on Company premises or whilst on Company business, will be treated seriously in accordance with the Company's Disciplinary Policy and may constitute gross misconduct.

11. GENERAL NEGLIGENCE

- 11.1 You are expected to undertake your work with due regard for the health and safety, well-being and property of other workers, business contacts and members of the public. Any worker who is found to be generally negligent of their duty of care or who disregards laid down standards, policies and procedures resulting in a threat to the health, well-being or property of others, may be subject to disciplinary action in accordance with the Company's Disciplinary Procedure.

12. GENERAL FITNESS FOR DUTY

- 12.1 In order to discharge responsibilities safely, efficiently and effectively, you are expected to be fit for work and to commence work at the designated time. You must not report for duty under the influence of alcohol, drugs or other substances to the extent that it may affect your own performance or safety, or the safety of others.

At any Company events, both inside and outside working hours, you are expected to follow this Code of Conduct as such events form part of your working life with the Company. Where alcohol is available at Company events, you must not allow yourself to become under the influence of alcohol to the extent that you affect your own health and well-being, and that of others, or behave in a manner that could be viewed by others as inappropriate, hostile, improper or offensive. You are reminded that at all times you should behave in a manner that promotes respect and individual dignity. You must ensure that you are fit for work and that you are able to drive your vehicle safely and legally.

Inappropriate behaviour or poor performance resulting from consumption of alcohol, drugs or other substances will result in disciplinary action being taken in accordance with the Company's Disciplinary Procedure and may result in dismissal.

13. ANTI-BRIBERY AND CORRUPTION POLICY

The Company is committed to ensuring adherence to the highest legal and ethical standards and will apply a "zero tolerance" approach to acts of bribery and corruption by any employee or business partner. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and incline them to act dishonestly. Whether the payee or recipient of the act of bribery or corruption works in the public or private sector is irrelevant.

The Company has developed a specific Anti-bribery and Corruption Policy to which you should refer for more information and on which the employees are trained.

Any breach of the Anti-bribery and Corruption Policy will be regarded as a serious matter by the Company and is likely to result in disciplinary action in accordance with the Company's Disciplinary Procedure and which may result in dismissal, or a termination of the business relationship.

13.1 Gifts and Hospitality

No gifts should be given to customers apart from promotional items authorised by the Company. Similarly, accepting gifts, favours or other benefits from customers/suppliers or potential customers/suppliers is not allowed, unless what is offered is of nominal value and not connected in any way with performance of duties nor a bribe or inducement in connection with business. If in any doubt, you should seek the advice of your Line Manager, Director of Compliance or the Human Resources Department.

Financial inducements (e.g. payment for room hire) must not be used to generate access with healthcare professionals.

Non-approved promotional aids (including confectionary, biscuits, flowers etc) must not be used for access with receptionists.

Please refer to the Anti-Bribery and Corruption Policy for more information.

14. CRIMINAL OFFENCES

14.1 A criminal offence, whether committed during working time or outside working hours, will be treated very seriously. It is important that the reputation of the Company, and general safety and well-being of staff and the general public are protected at all times. You are required to inform the Company if you are charged or convicted of a criminal offence that is relevant to your employment with the Company, excluding an offence under the road traffic legislation for which you are not banned from driving for any period or sentenced to any term of imprisonment whether immediate or suspended. Any allegations of a criminal

offence, whether or not it results in conviction, will be investigated and action taken, which may mean dismissal, should it be considered that the offence is one that is relevant to your employment with the Company.

Any incident of theft or deliberate attempt to defraud or deceive the Company, other members of staff, public or customers, during the course of work activities, may constitute gross misconduct. This could result in summary dismissal, in addition to criminal proceedings being taken against that member of staff.

15. REPORTING CONCERNS

- 15.1 You are expected to report promptly any breach of law, regulation, or Servier UK policy, or any fraudulent activity that comes to your attention. This includes any concerns you may have about the activities of fellow employees, consultants and contract or temporary workers. You should raise your concerns before problems develop.

As a first step, you should normally raise concerns with your immediate manager or their superior, who would then report it to the Responsible Officer. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that management is involved you should approach the Head of Human Resources, or the Chief Executive Officer, whoever you deem appropriate for the nature of the concern.

All concerns will be treated in confidence and the Company will keep your identity secret if you so wish. It must be appreciated that the investigation process may reveal the source of the information and a statement by you may be required as part of the evidence. At the appropriate time you may need to come forward as a witness. The Reporting of Concerns policy encourages you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Company.

More details can be found in the Reporting of Concerns Policy and Procedure.

16. USE OF SOCIAL NETWORKING WEBSITES POLICY

- 16.1 You are expected to use social media in a responsible and ethical manner. The possibility of reacting or contributing to information or opinions expressed on the Internet may encourage Company employees to post on collaborative sites on their own initiative, either in a professional capacity or in a personal capacity. Any comments or opinions expressed on such sites could potentially be detrimental to the Company's interests, or even pose risks in terms of public health when they concern medicinal products.

Please refer to the Use of Social Networking Websites Policy for more information.

Any breach of this policy will be regarded as a serious matter by the Company

and is likely to result in disciplinary action in accordance with the Company's Disciplinary Procedure and which may result in dismissal.

17. PHARMACOVIGILANCE REPORTING REQUIREMENTS

- 17.1 The timely communication of PV information received by any UK Servier personnel to the person responsible for PV in the UK ICTR is essential in order to facilitate compliance with regulatory reporting timelines.

More details can be found in the SOP entitled 'Communication of Spontaneous Reports of Pharmacovigilance Information to Pharmacovigilance'.

Any breach of the Company's reporting requirements will be regarded as a serious matter by the Company and is likely to result in disciplinary action in accordance with the Company's Disciplinary Procedure and which may result in dismissal.