

# THE IPSEN WAY

CODE FOR ETHICAL CONDUCT

# ETHICS

**D**uring your daily activities, please always remember the word ETHICS to make the right decisions to help Ipsen reinforce all stakeholders' trust, including:

- Patients and Patients Associations
- Employees
- Healthcare Professionals
- Customers
- Public entities
- Media
- Suppliers
- Partners
- Competitors
- Investors
- Shareholders

Dear Colleagues,

**O**ur dedication to improve the health and quality of life of our patients demands the highest ethical standards. Ethics govern our actions and behavior, not only when it comes to providing better care, but throughout all areas of company life. We ensure we act in an ethical way with patients, health professionals, public institutions, competitors, partners, shareholders and our colleagues.

Ipsen is committed to promote a culture of ethics and compliance across the organization.

As a company with global operations and professionals from different cultures and with different languages, it is important that we share the same vision of ethics.

Because we are a pharmaceutical company, I believe we have to go further and ensure that the way we conduct business and promote our products is performed in a truly ethical manner.

The adherence of Ipsen employees, and of other professionals working for Ipsen, to the Ipsen Way is a guarantee of our genuine contribution to improvements in patient health and, ultimately, to the sustainable growth of our company.

Marc de Garidel

# EQUITY

At Ipsen, we believe that equity of employees is the cornerstone of our success: ensuring that employees and applicants are treated in a fair way. The success of our company can only be achieved by upholding Labour and Human Rights.

## **Employment Equity**

Building on employee differences creates a productive and collaborative workplace. We are committed to promoting diversity in our recruitment and not discriminate based on personal characteristics such as nationality, gender, age, religion, ethnicity or disability.

## **Equity in your Relationship: Respect for People**

Lack of mutual respect fosters a hostile and offensive workplace. We aim to create an environment free of verbal or physical harassment by encouraging our employees to engage with colleagues, regardless of their personal background or characteristics, beliefs or positions in the company.

## **Professional Equity**

We drive employees' engagement by setting-up a positive framework:

- fostering employee development by providing access to training and mobility and with ongoing dialogue about employees' needs and motivations,
- promoting a managerial excellence culture,
- involving each and every one of our employees in a continuous improvement approach, with a fair and competitive remuneration policy,
- evaluating the performance of our employees against key business objectives and expected behaviours.



# TRANSPARENCY

At Ipsen, we believe that transparency is key to ensure the safety of our patients, and reinforces the trust of our stakeholders.

## **Product Transparency**

We are committed to being transparent about our products and to disclosing to health authorities any required information, fully respecting international, regional or local laws and regulations.

Results of our clinical studies are disclosed publicly on line in accordance with applicable regulations.

Additionally, we are accountable for giving fully transparent, fair and balanced information in all promotional, educational and commercial activities, and our scientific and medical community is committed to addressing promptly and in such manner all inquiries from health care professionals. In all countries, the promotion of our products, through our interactions with healthcare professionals and our advertising materials, is strictly limited to the indications and conditions of use described in the Prescribing Information approved by the relevant authorities.

## **Healthcare Professionals, Healthcare Organisations and Patient Groups Transparency**

We are accountable for ensuring that all interactions with healthcare professionals, organisations and patient groups are fair and justified by legitimate needs. To achieve this, we are fully committed to disclosing information publicly about our interaction with these stakeholders as required by international or local regulations.

## **Financial Transparency**

We are accountable for maintaining, on a timely basis, accurate and reliable records on which Ipsen's public disclosures are based. These disclosures include among others: financial statements, annual reports and similar publications as well as any information made public by any means (including press releases, press conferences, analyst conferences, public presentations, etc...).

# HEALTH DEDICATED

At Ipsen, improving the lives of patients is what drives us. The search for innovative solutions to disabling conditions is at the heart of everything we do. Increased life expectancy is making the pursuit of our inspiring vocation more vital than ever: finding safe and effective therapeutic solutions to cure diseases, relieve suffering and bring value to the community.

In addition, we strive to protect the health of our employees and the general environment.

## Patient Health

To reach our commitment of providing products of the highest quality, we comply with the highest standards, in all the steps of our products' life cycles, including but not limited to:

### ■ Good Pharmacovigilance Practices (GVP)

Pharmacovigilance (Drug Safety) has been defined by the World Health Organization (WHO) as the science and activities relating to the detection, assessment, understanding and prevention of adverse effects or any other medicine-related problem.

Ipsen's safety culture is one of integrated safety sciences. We ensure that safety data are collected and reviewed in an integrated manner from research studies, throughout the development process and continues in life cycle management once a product reaches the market place.

### ■ Good Manufacturing Practices (GMP)

We ensure that our products are consistently manufactured and controlled against the quality standards appropriate to their intended use and as required by the marketing authorization.

### ■ Good Distribution Practices (GDP)

We ensure that the level of quality is maintained throughout the distribution network, in order to distribute medicines to customers without any alteration of their properties.

### ■ Good Clinical Practices (GCP)

We ensure the safety of the patients who take part in our clinical trials, and we uphold the highest ethical, scientific and clinical standards in all of our research initiatives worldwide.

### ■ Good Laboratory Practice (GLP)

We ensure the generation of high quality and reliable test data related to the safety of industrial chemical and biological substances.

## Health of Employees and Healthy Environment

Through our comprehensive Environment, Health and Safety (EHS) program, we are committed to avoiding risks to employee health and safety in the workplace, including psychosocial risks, and to the implementation of a strategy which is respectful of the environment.

## Animal Welfare

We implement the 'Three Rs' principle of Refinement, Reduction and Replacement of laboratory animals used in our research and development activities.



# INTEGRITY

At Ipsen, we are convinced that our business integrity is key to maintain the highest level of performance and the trust of our stakeholders.

## Anti-bribery Practices

The legal definition of bribery varies from one country to another, but it always means: “The act of offering something in order to obtain an undue interest or advantage”.

Because bribery distorts fair trade, hinders economic development and imposes multiple costs on society at large, we do not tolerate any form of bribery or corruption.

## Conflict of Interest

Our employees shall not put themselves in a situation where there is an actual, apparent or perceived conflict of interest between their role within Ipsen and their own financial and personal situation, which could influence their ability to act in the best interest of Ipsen.

## Relationships with Competitors

The aim of antitrust laws is to secure free competition between companies in a market place for the benefit of customers. We comply with competition laws.

- No discussion shall be held with competitors relating to prices, conditions of sales, market share, profit, production facilities or capabilities with respect to any Ipsen products or competitors' products, unless it is permitted by laws and regulations and it is held in a lawful manner.
- No agreement (whether written or oral, implicit or explicit) shall be made with competitors relating to any sharing or allocation of markets, territories or customers.

## Intellectual Property Rights Confidentiality • Data Protection

Ipsen's confidential information is a valuable asset. Our employees shall properly use, at all times, Ipsen's resources, assets and information in an ethical manner and in accordance with the business objectives pursued. Our employees should always ensure that their actions prevent, or do not facilitate theft, damage, misappropriation or misuse of Ipsen's resources, assets and information.

Our confidential information includes, for example, product architectures, source codes, product plans and road maps, names and lists of customers, healthcare professionals and employees, and financial information. This information is the property of Ipsen and may be protected by patent, trademark, copyright and trade secret laws. All confidential information must be used for Ipsen's business purposes only.

# COMPLIANCE

Ipsen complies with all laws, regulations and industry codes applicable to its activities.

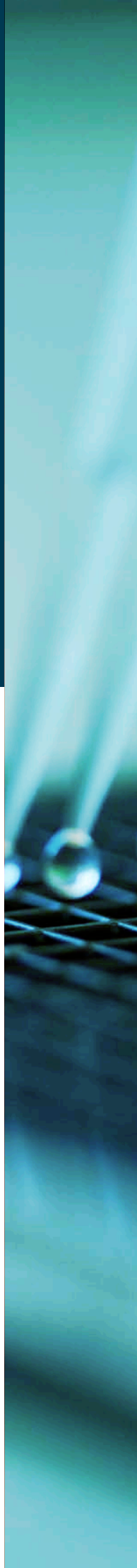
The employees also comply with Ipsen policies and procedures that apply to their business and their role.

## SPEAK UP

At Ipsen there are many channels to address Ethics & Compliance inquiries or issues:

- your manager,
- the Human Resources department,
- the Ethics & Compliance department.

To report any potential misconduct in one of the following domains: accounting, finance, anti-corruption, uncompetitive practices, an employee may also refer to the Alert Procedure behind.



# ALERT PROCEDURE

- IF AN EMPLOYEE IS AWARE OR SUSPECTS, in good faith, ANY MALPRACTICE OR VIOLATION of this Code regarding accounting, finance, anti-corruption or uncompetitive practices, HE/SHE IS STRONGLY ENCOURAGED TO REPORT IT TO IPSEN ETHICS HOTLINE. This procedure is NOT AN OBLIGATION and there will be no consequence with respect to employees in the event of non-use.

Please write to:

**[Ipsen.Ethics.Hotline@ipsen.com](mailto:Ipsen.Ethics.Hotline@ipsen.com)**

or contact the Chief Ethics and Compliance Officer.

- Employees are invited to identify themselves, to limit the dangers of false accusation, to allow the protection of the author against possible reprisals and a better treatment of the alert.
- Ipsen will treat all reports with sensitivity and ensure confidentiality as far as possible.
- When disciplinary measures or legal proceedings are engaged, data is kept until the closing of the procedures. This data is preserved up to two months if there is no follow-up concerning the alert.
- At any time, employees can ask to access the data which concerns them and/or the modification of such data in case of error. For the avoidance of doubt the person against whom the alert has been activated, even if this person also has a right of access and rectification concerning the data which concern her/him, cannot obtain the identity of the employee who started the Alert Procedure.
- If an employee genuinely believes that there is some form of malpractice or violation of this Code raised in accordance with this Alert Procedure, Ipsen will ensure that this employee will not suffer any consequences as a result of speaking up. However, if an employee raises a concern which he or she knows to be false or raises a concern solely out of malice, disciplinary action may be taken.